

PUBLIC TRANSPORTATION AGENCY SAFETY PLAN



Effective December 15, 2022

Greater Hartford Transit District
One Union Place
Hartford, CT 06103

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Section 1 – Transit Agency Information

Introduction and Applicability §673.1 (a)

The Federal Transit Administration (FTA) requires States and operators of public transportation systems to create and maintain an Agency Safety Plan (ASP) in accordance with 49 C.F.R. Part 673 the full text of which is available at <http://www.transit.dot.gov/PTASP>. To comply with this requirement, the Greater Hartford Transit District (The District) has completed this Public Transportation Agency Safety Plan (PTASP) which provides information on agency policies and practices.

The District operates more than 100 vehicles in peak revenue service, therefore this plan includes all applicable requirements and standards of Tier 1 systems by the Federal Transit Administration’s (FTA) Public Transportation Safety Program and the National Public Transportation Safety Plan (NPTASP).

Section 1 - Transit Agency Information

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

Agency	Greater Hartford Transit District
Name and Title of Accountable Executive	Vicki L. Shotland Executive Director
Name and Title of Chief Safety Officer	Miguel LeFebre Transportation & Facility Coordinator
Modes of Service Covered by this Plan	Demand-Response ADA Paratransit Services
Modes of Service Provided by Agency	Demand-Response ADA Paratransit Services

The District contracts with a third-party contractor to provide Demand-Response ADA Paratransit Services in the Greater Hartford Transit District. The agency’s service area is 516 square miles with a population of 924,859. In FY22, the District operated over 3.9 million passenger miles, providing over 407,000 unlinked passenger trips using 165 vehicles in maximum service. The District continues to operate 165 vehicles in maximum service.

Federal Transit Administration Funding Types

5307 Urbanized Area Formula Grants

5309 Capital Investment Grants

5310 Enhanced Mobility for Seniors & Individuals (administered through CTDOT)

Integrated Mobility Innovation (IMI) Grant

FTA Section 5307 funds are used to support the paratransit service through the purchase of rolling stock and miscellaneous support equipment. Operational costs are supported through state and local funding sources. Some operational costs have been funded by the CARES Act and American Rescue Plan funds.

FTA Section 5309 are used strictly for subrecipient projects where the District is the fiscal agent. FTA Section 5310 funds are used to fund the Freedom Ride Taxi Voucher Program and Accessible Vehicle purchases for local taxi companies. These funds are not related to the operation of the District's ADA Paratransit service.

Service Provision

The District does not provide transit services on behalf of any other transit agency or entity. All District services are provided under contract by a third-party contractor.

Name and Address of Entity for which Services are Provided:

Administrative Offices

Greater Hartford Transit District
One Union Place
Hartford, CT 06103

Operations and Maintenance Facility

Greater Hartford Transit District
ADA Paratransit Operations and Maintenance Facility
148 Roberts Street
East Hartford, CT 06108

Section 2 – Plan Development, Approval and Updates

§673.5 and §673.23(d) Accountable Executive and a Chief Safety Officer

Name of Entity that Drafted this Plan: Greater Hartford Transit District

Accountable Executive Vicki L. Shotland, Executive Director

Greater Hartford Transit District

- Single person who has ultimate responsibility for carrying out the PTASP and the Agency's Transit Asset Management (TAM) Plan
- Controls and directs human and capital resources needed to develop and maintain the Agency's Safety Plan and TAM Plan
- Ensures that the agency's Safety Management System (SMS) is effectively implemented and actions are taken, as necessary, to address substandard performance in the agency's SMS

Signature by the Accountable Executive



Date of Signature

12-6-2022

Chief Safety Officer Miguel Lefebre, Transportation and Facility Coordinator

Greater Hartford Transit District

- Individual with authority and responsibility for day to day implementation and operation of the SMS
- Meets the following criteria:
 - Designated by the Accountable Executive
 - Reports directly to the Accountable Executive
 - Full, part-time or contracted employee
 - May serve other functions in addition to safety such as operations and maintenance

Signature by the Chief Safety Officer



Date of Signature

12-6-2022

Safety Committee

The District developed the PTASP Safety Committee on July 15, 2022. As required by the Bipartisan Infrastructure Law, this committee was convened by a joint labor-management process and consists of an equal number of frontline employee representatives and management representatives.

The committee's responsibilities include (at a minimum):

- 1.) Identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment;
- 2.) Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and
- 3.) Identifying safety deficiencies for purposes of continuous improvement.
- 4.) Assisting in the update of the PTASP
- 5.) Review and approval of the PTASP and any updates prior to Board approval.

The District's Safety Committee is currently comprised of the following members:

Frontline

- First Transit - Technician
- First Transit - Road Supervisor
- First Transit - Driver

Management

- First Transit - Safety Manager
- First Transit - Maintenance Manager
- Greater Hartford Transit District - PTASP Chief Safety Officer

The Safety Committee approved the update of this plan on November 30, 2022.

Certification of Compliance - Plan Approval and Annual Updates §673.13

A vote approving the establishment of the Public Transportation Safety Plan (PTASP) document was taken at the District's Annual Board of Director's meeting on December 15, 2022. This vote of acceptance meets the requirements of 49 C.F.R. Part 673. The District's Board will certify compliance with PTASP regulations on an annual basis to ensure federal requirements are met including the completion of Certification and Assurances in TrAMS as completed by the Executive Director. The PTASP is intended to be a living document and as new best practices are identified, the District anticipates incorporating them into the Plan. Changes to the PTASP will be recorded as an appendix to this report.

As a result of the Bipartisan Infrastructure Bill being signed into law by President Biden on November 15, 2021, the Greater Hartford Transit District's Safety Committee will approve the PTASP and updates to the PTASP prior to approval by the District's Board of Directors.

Approval set forth by: Greater Hartford Transit District's Board of Directors

Date of PTASP Safety Committee Acceptance: November 30, 2022

Date of PTASP Board Acceptance: December 15, 2022

Date of Submission of Certification and Assurance: February 9, 2022

*Documentation of this action is included in the Board records on file at The District's offices.

Date of PTASP Board Acceptance (Original): November 19, 2020

Date of PTASP Board Acceptance (Update): November 4, 2021

Process and timeline for conducting the Annual Review

The District's Accountable Executive holds agency management and third-party contractors accountable for compliance with the processes and procedures detailed in this PTASP to ensure adequate safety performance and fulfill requirements of 49 CFR Part 673. The District's CSO and the Director of Grants, Procurement and Contract Administration will jointly coordinate the annual review of the PTASP by notifying each department of a requirement to review sections applicable to their functions to ensure that the plan aligns with their current processes. The CSO and Director of Grants, Procurement and Contract Administration will incorporate the comments and will work with the PTASP Safety Committee to update the plan in order to meet all requirements. A draft will be provided to the AE by no less than one month prior to the annual review by the agency's Safety Committee and Board of Directors. Any changes to the PTASP will be documented and the updated document will be provided to the AE for review and approval. The PTASP will be approved by the Safety Committee prior to Board approval. The AE will present the updated plan with changes for review to the Board of Directors at the agency's Board meeting.

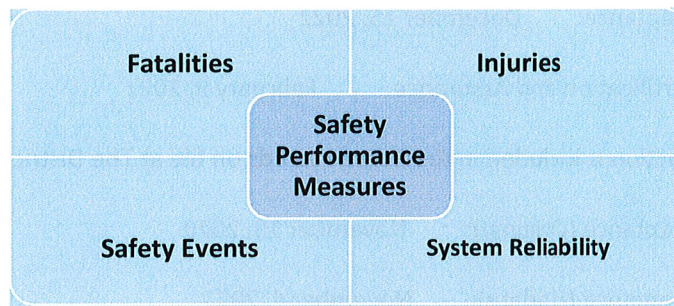
Section 3 - Safety Performance Targets §673.5

The Safety Performance Targets set forth in this section have been developed in consultation with the CTDOT and CRCOG and are derived with input from the FTA's NPTSP (January 2017). A safety performance target is a quantifiable level of performance or condition expressed as a value for the measure related to safety management activities to be achieved within a set time period (§673.5). A safety performance measure is a quantifiable indicator of performance or condition that is used to establish targets related to safety management activities and to assess progress towards meeting the established targets.

In setting target goals for safety, the District reviewed historic performance over a period of five years. The five-year average was determined to be a reasonable and attainable target goal for the District.

Safety Performance Targets (SPT)

The District has developed safety performance targets based on the safety performance measures established under the NPTSP (§673.11 (a)(4)) in four categories:



Fatalities

- Total Number of Fatalities
- Total Number of Fatalities per vehicle revenue miles

Injuries

- Total Number of Injuries
- Total Number of Injuries per vehicle revenue miles
- Total number of preventable passenger injuries
- Total number of preventable passenger injuries per vehicle revenue miles
- Total number of preventable staff injuries
- Total number of preventable staff injuries per vehicle revenue miles

Safety Events:

- Total Number of Safety Events
- Total Number of Safety Events per 1,000,000 vehicle revenue miles

System Reliability

- Mean distance between major mechanical failures by mode.

Driver Assaults

- Total Number of Driver Assaults
- Total Number of Driver Assaults per vehicle revenue miles

Accidents Involving Buses

- Total Number of Pedestrian Accidents Involving Buses
- Total Number of Vehicular Accidents Involving Buses

Safety Performance Measures

Fatalities

Safety is the top priority for the District and within that priority - preventing fatalities is of utmost importance. Staff works continuously to educate themselves and understand factors involved with fatalities. GHTD has not had a fatality over the past five years. We will continue to strive to maintain this level of safety and have identified a target goal of zero fatalities in absolute number as well as relative to vehicle revenue mileage.

Fatalities

	2017	2018	2019	2020	2021	Target Goal
Fatalities	0	0	0	0	0	0

Fatalities/Million Vehicle Revenue Miles

	2017	2018	2019	2020	2021	Target Goal
Fatalities/Million VRM	0	0	0	0	0	0

Injuries

The District is diligent about promoting safety internally throughout the system, however, at times, injuries may occur. These may be attributable to a wide range of factors. The District reviews all preventable injuries to determine if opportunities for further safety enhancement may be discovered.

To assist the District in determining the frequency of injuries, the number of injuries is compared to the number of vehicle revenue miles operated. This provides an “apples to apples” look at the frequency of injuries as they relate to the amount of service the District provides.

The District reviews data for preventable injuries. Each preventable injury is classified by category: passengers or staff. This provides insight into who had been injured and will assist the District to further refine its preventative measures. The following two tables provide an overview of injuries by passenger and staff as well as the ratio of injuries of passengers and staff as it relates to the total number of vehicle revenue miles provided.

Total Number of Preventable Injuries

	2017	2018	2019	2020	2021	Target Goal
Preventable Passenger Injuries	6	7	10	8	3	6.8
Preventable Staff Injuries	22	17	14	19	14	17.2
Total Preventable Injuries	28	24	24	27	17	24
Preventable Passenger Injuries/1M VRM	1.4	1.6	2.3	2.9	0.9	1.8
Preventable Staff Injuries/1M VRM	5.2	3.9	3.2	6.8	4.1	4.6
Total Preventable Injuries/1 M VRM	6.6	5.5	5.5	9.7	5	6.5

Safety Events

Safety Events refers to the number of preventable collisions attributable to District vehicles in the course of service. The following two tables provide information on the number of safety events and the frequency of safety events. In comparing the number of preventable collisions to the number of vehicle revenue miles, the relative safety of the system with regard to that indicator is adjusted based on the amount of services provided. In the event of every vehicle accident, District representatives make a determination as to whether or not the event was preventable. Information gathered from these events is used to refine policies and training and to develop mitigation measures to reduce the frequency and severity of events.

The National Safety Council (NSC) defines a preventable accident as: “An accident in which the driver failed to do everything that they reasonably could have done to avoid a collision.”

Total Number of Safety Events

	2017	2018	2019	2020	2021	Target Goal
Safety Events	15	15	18	13	13	14.8
Safety Events/1 M VRM	3.6	3.5	4.1	4.7	3.8	3.9

System Reliability

System reliability provides insight into the safety and condition of the system’s assets. The rate of system reliability, as defined by mean distance between major mechanical failures, is measured as

vehicle revenue miles operated divided by the total number of major mechanical failures. A major mechanical failure occurs when a vehicle is unfit to drive and is taken out of revenue service and replaced by another vehicle.

System Reliability - Mean Distance between Major Mechanical Failure

	2017	2018	2019	2020	2021	Target Goal
Mean Distance between Major Mechanical Failure	50,154	50,808	85,493	82,482	55,044	64,796.2

Driver Assaults

The District believes that one driver assault is too many, and that the safety of our workforce is a priority. For this reason, the District’s target for driver assaults is zero. We will measure this metric as the number of incidents and the number of incidents per 1,000,000 vehicle revenue miles. The District began tracking this metric to work with our third-party contractors in July 2020 to achieve this goal.

A driver assault is defined as the intentional use of unnecessary force that results, or was intended to result, in physical contact with the victim. The degree of force used is immaterial (e.g. touching, spitting, pushing or striking) and physical contact can be by any part of the assailant’s body or bodily fluid, or by the use or display of any missile or weapon. If a weapon is produced but not used, or a missile thrown but fails to make contact, this constitutes an assault. This would also include sexual assaults where physical contact is made.

Driver Assaults

	2020	2021	Target Goal
Driver Assaults	0	0	0
Driver Assaults/1,000,000 VRM	0	0	0

Driver Assaults/Million Vehicle Revenue Miles

	2017	2018	2019	2020	2021	Target Goal
Driver Assaults/Million VRM	0	0	0	0	0	0

Accidents

Safety is the top priority for the District and within that priority – preventing pedestrian and vehicular accidents with buses is of utmost importance. Staff is continuously educated and trained in safety to prevent pedestrian and vehicle accidents. GHTD has not had a single pedestrian accident involving a bus over the past five years. We will continue to strive to maintain this level of safety and have identified a target goal of zero pedestrian accidents. If this statistic changes in the future, the District will work to identify additional risk reduction measures.

Pedestrian Accidents Involving Buses

	2017	2018	2019	2020	2021	Target Goal
Pedestrian Accidents Involving Buses	0	0	0	0	0	0

Vehicular Accidents Involving Buses

	2017	2018	2019	2020	2021*	Target Goal*
Vehicular Accidents Involving Buses	15	15	18	14	-	15.5

**Data for 2021 not available yet. Target goal based on average of 4 years.*

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

Under Part §673.15, the District is required to coordinate with the regional Metropolitan Planning Organization (MPO), the Capital Region Council of Governments (CRCOG) in the selection of safety performance targets developed and used in this plan. The District has a strong working relationship with CRCOG and collaboratively develops compliance documents to program and provide public awareness of agency federal funding use as well as to plan for the future of transportation for the region.

State Coordination

On February 19, 2020, CTDOT met with Connecticut public transit districts to review the status of the PTASPs and to discuss best practices within the development of the plans. At this meeting, transit districts shared experiences developing the plans and discussed developing their individual PTASPs. CTDOT and the transit districts have continued to share relevant information over the duration of the development of this document. The District provides a draft PTASP for comment to CRCOG and CTDOT and holds discussions with relevant staff to ensure that District target goals were coordinated with partner organizations including those that program federal funds.

The District was also afforded the opportunity to review CTDOT’s PTASP which allowed the District to ensure that the documents were mutually supportive in their overall safety goals.

It is important to note that the District has a strong collaborative relationship with CRCOG and CTDOT and is a voting member of the MPO. Through CRCOG’s Transportation Committee, District staff has an opportunity to provide input into many of the regional documents including the Unified Planning Work Program (UPWP), (State) Transportation Improvement Program (TIP/STIP) and the region’s Long-Range Transportation Plan (LRTP). It should also be noted that through the TIP process, CRCOG programs the District’s federal transportation funds and plays an important role in ensuring that the agency maintains its assets in a state of good repair.

Section 4 – Safety Management Policy

Safety Management Policy Statement §673.23

The Greater Hartford Transit District is committed to the provision of safe transportation services for our passengers and to providing a safe working environment for District employees and employees of the District's third-party contractor. To achieve this goal, the District has adopted the following safety objectives:

- Knowledge and Training – The District and its third-party contractor use industry knowledge, training and best practices to identify and mitigate safety concerns.
- Openness and Communication – The District maintains an open-door policy and hosts clear and discrete forums in which employees, contractors, passengers and the public can readily report safety concerns.
- Data and Performance Management – The District uses data to track progress towards agency safety targets. Daily and monthly reports track critical safety activity and provide the District with a moving dashboard of information. Weekly meetings between District management and third-party contractors provide opportunities to review the information and address trends, discrepancies or anomalies in the reports.
- Continual Improvement – The District responds to opportunities to learn from ourselves and others to continually refine safety practices and procedures.

The District is committed to the safety and steps outlined in its Safety Management Plan. Key areas for engagement include:

Outreach – The District works with the PTASP Safety Committee and the third-party contractors to collect critical data to ensure that we measure and maintain a database of information that can assist us in reaching agency safety targets. In addition, the District uses gateways for employees to voice safety concerns in ways that provide alternative avenues of input into the safety review process.

Risk Avoidance and Risk Reduction – The District will work with the Safety Committee, employees, and contractors to identify and eliminate, as well as reduce and mitigate potential hazards. Using education, training and encouragement, the organization will empower individuals to communicate safety concerns as well as encourage them to address real time issues as they occur. The District will continue to provide oversight to complement FTA, DOT and OSHA safety and operating requirements and recommendations.

The SMS Policy Statement lays out objectives and key areas of engagement that support the District's commitment to safety and the processes used to identify and track our progress towards meeting our safety target goals.

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

The District's PTASP is an important guide for District stakeholders to use in understanding our commitment and practices with regard to safety. For this reason, the District has identified a number of measures to ensure that information contained in this PTASP is circulated to stakeholders.

- All employees will receive training in the PTASP including what their roles and responsibilities are as safety ambassadors for the District.
- New employees shall be given an overview of the PTASP and their role in safety at the agency.
- The Chief Safety Officer shall ensure that updates to the PTASP are communicated effectively to District employees and contractors as well as other key stakeholders including CTDOT and CRCOG. The CSO will instruct the contractor to communicate with contract employees using a variety of tools including:
 - Bulletin boards
 - Newsletters
 - Training
 - Hiring Practices
 - Notices in employee mailboxes
 - Verbal announcements
 - Information at driver assignment window
 - Subject matter meetings
 - Text notification (for supervisors)
- Performance regarding safety metrics will be posted in areas easily accessible to District staff, contractors and the general public.
- Quarterly Safety Committee Meetings are held to discuss any safety issues that are not easily resolved or that need to be brought to the attention of both the Contractor and District.
- A copy of the document is available for public review on the District's website at www.hartfordtransit.org

The document will also be transmitted to CRCOG and CTDOT's Bureau of Public Transportation.

Authorities, Accountabilities and Responsibilities §673.23 (d)(4)

The District has identified senior leadership who are accountable and responsible for the implementation of the SMS.

Accountable Executive: Vicki L. Shotland, Executive Director

Role and Responsibility

- Single person who has ultimate responsibility for carrying out the PTASP and District's Transit Asset Management (TAM) Plan
- Controls and directs human and capital resources needed to develop and maintain Agency Safety Plan and TAM Plan
- Ensures that the agency's Safety Management System (SMS) is effectively implemented and actions are taken, as necessary, to address substandard performance in the agency's SMS

Chief Safety Officer: Miguel Lefebre, Transportation & Facility Coordinator

Role and Responsibility

- Individual with authority and responsibility for day to day implementation and operation of the SMS

➤ Meets the following criteria:

- Designated by the Accountable Executive
- Reports directly to the Accountable Executive
- Full, part time or contracted employee
- Qualified to direct and implement safety policies and protocols within the organization
- May serve other functions in addition to safety such as operations and maintenance

At the Greater Hartford Transit District, safety is everyone’s job. All employees, regardless of position, are empowered to report issues of concern regarding workplace and operating conditions. However, in addition to the Accountable Executive and Chief Safety Officer, there are additional employees who have a leadership role in the oversight of safety at the District.

These positions include:

Agency Leadership

Accountabilities and Responsibilities

Director of ADA Paratransit Services

Oversees the District’s ADA program including the determination of eligibility of passengers for ADA compliant services.

ADA Paratransit Rider & Community Liaison

Serves as a liaison between riders, community agencies, and the general public and the ADA Paratransit operation

Director of Grants, Procurement and Contract Administration

Identifies opportunities to improve capital and operations through the strategic use of resources.

Transportation and Facilities Coordinator

Ensures that vehicles and facilities are safe and in good working condition.

GHTD service is operated through a contractual agreement with a third-party contractor. Certain employees of the third-party contractor are also critical leaders of the District’s safety oversight. These positions include:

General Manager

Senior Manager responsible for all aspects of the operation, as well as supervises day to day operations. Decision-making position that is available 24/7 to support District operations and is responsible for front line supervision. Well versed in emergency protocols.

Operations Manager	Assists the General Manager in the oversight and management of the District’s operations including emergency protocols.
Maintenance Manager	Responsible for oversight, care and maintenance of both the District’s facilities and vehicles.
Safety Manager	<p>Responsible for driver training and safety. Responsibilities include all training, the Drug and Alcohol program and certifications and compliance. Employee must be a National Safety Council Defensive Driving Instructor or have an equivalent training and certification. Responsible for conducting and/or delegating classroom and behind-the wheel training (new-hire, annual refresher, remedial and other refresher training) and evaluating drivers. Monitors accident trends and directs all retraining efforts. Responsible for reporting and generating monthly, quarterly and annual spreadsheets which include:</p> <ul style="list-style-type: none"> ▪ preventable accidents per 100,000 miles ▪ preventable accidents by employee tenure ▪ body damage repair costs ▪ all other District required reports
Road Supervisors	Provide direct “in the field” oversight of drivers. Respond to road calls including all accidents and/or emergencies. Responsible for accident investigation and documentation.

Key Staff Accountabilities and Responsibilities

In addition to leadership positions, many of the third-party contractor’s **frontline** workers are in positions which require significant attention to safety.

Drivers	Drivers are the front-line employees who are tasked with working directly with our passengers. They are responsible for picking up and dropping off passengers safely. In the case of passengers who use mobility devices, drivers will secure the mobility devices to ensure safe transport of passengers.
Mechanics	Mechanics play a fundamental role in ensuring that our vehicles are in safe operational working order. Through regular preventative maintenance and repair work on the vehicles, our mechanics ensure that vehicles are in good working order.
Maintenance Staff	Maintenance Staff at the District ensure that the facilities are kept in good working order. Spills or hazards are remedied or repaired quickly.

Safety Committee

Together, the following individuals represent the District's safety team. Working together they provide oversight and accountability in the implementation of the agency's SMS.

Frontline

- First Transit - Technician
- First Transit - Road Supervisor
- First Transit - Driver

Management

- First Transit - Safety Manager
- First Transit - Maintenance Manager
- Greater Hartford Transit District - PTASP Chief Safety Officer

Employee Safety Reporting Program §673.23(b)

The District works closely with its third-party contractors to ensure that protocols and policies are in place for employees to report safety issues at work. This process is supported by a strong on site safety team with an emphasis on personal responsibility and open communications.

Members of the District’s operations team are provided with a variety of outlets for identifying and reporting safety concerns. The District’s current third-party operating contractor has a management team that includes corporate support as well as on-site management. On-site management includes a Location General Manager (LGM) and a Location Safety Manager (LSM) who guide and oversee employee reporting as well as provide their own safety reports to District management.

- The LGM is a full-time member of the District’s team and participates in weekly meetings with management to ensure the operation is running effectively.
- The LGM is also responsible for ensuring implementation of the National Safety Program as well as the District’s PTASP.
- The LSM routinely is in contact with Operations and is responsible for ensuring their locations have the safety programs in place including the PTASP, audits local safety efforts, reviews accident and injury claims, reviews performance statistics, and coordinates corporate assets to address specific deficiencies found on the local level.

The LSM may conduct a location safety review of the District to review safety policies and protocols based on certain criteria as outlined below. This type of safety audit allows the third party contractor to systematically identify and report unsafe conditions or areas in which the District can take actions to improve safety.

Location Safety Review	
Category	Description
Scope of Safety Reviews	Locations are selected based upon risk-based criterion. Individual locations receive a review every 2-3 years
Risk-Based Selection Criterion	Locations selected based on declining 3-year reviews; sites with new location managers; high collision/injury Accident Frequency Rate (AFR); prior year failing score
Review Format	More narrow and focused audit template which includes a balance of compliance assurance as well as location-specific risks and safety performance.

Employees of the District's third-party contractor are coached on safety reporting throughout their employment beginning with the employment process. There are several ways that employees and third-party contractors report safety information.

Employee Reporting Programs

The District and the District's third-party contractors pride themselves on a strong working relationship. Part of the foundation of that relationship is a commitment to strong communications and an open-door policy, which encourages employees and contractors to informally report unsafe conditions for immediate resolution. The District, however, recognizes the need to add more formal opportunities to report and track safety concerns including the use of anonymous reporting methods. The following are a representative sample of methods that are used to report safety concerns at the District.

First Transit Near Miss and Hazard Reporting

In the interest of employee and passenger safety, each employee is issued forms to document and report safety, route, and security concerns. Drivers are also encouraged to report any near miss incidents and hazards. A sample of a hazard report used by our third-party contractor is shown on this page.

If an employee is involved in a near miss or determines something they see to be a hazard, they are encouraged to report the event to their supervisor using these forms so that the organization can follow up on it, learn from it and potentially prevent a collision or injury from occurring in the future.

For the purpose of these forms, near misses are defined as an event where no harm was caused, but there was the potential to cause injury or ill health; a dangerous occurrence. Hazards are defined as anything that may cause harm in the near future. If the safety or security hazard requires immediate attention, dispatch is notified immediately. If immediate attention is not required, the employee is encouraged to submit the information to management by the end of their workday. Third-party contract managers may follow up with drivers to initiate conversations about their observations of both safe and unsafe behaviors. These conversations provide valuable real-world input into the District's training program by providing examples of safety issues and how they can be resolved.

Threatening or Suspicious Activity

The District is observant of threatening or suspicious behavior. Anyone who sees, hears, or learns of any conduct or statement that seems threatening or suspicious, and/or any weapon(s) on company premises or in company vehicles, is encouraged to immediately report such conduct or statement, either to his/her Supervisor or Manager or to notify the police.

Furthermore, the District's third-party contractors oversee facilities and ensure that individuals do not loiter in facilities unless they have a reason for being there. Ensuring that only system users are using the facilities reduces potential illegal activities on the premises and provides passengers with a safe and welcoming space.

Suggestion Box

While the District has a no retaliation policy, to alleviate any concerns that an employee or third-party contractor might have in reporting unsafe conditions, the third-party contractor also maintains a suggestion box which provides an opportunity for contractors to submit anonymous suggestions for the company to review. The box is checked on a weekly basis and any safety concerns are discussed at a weekly operations meeting between the District and its third-party operating contractor. The suggestion box is used for those instances in which an employee or contractor may not wish to report the information in person.

Third-Party Call-In Number

Another outlet for employee reporting is a third-party number, which is available for employees to call in the event that they are aware of a safety concern that they want to report anonymously. Information reported through that line is reported to senior management at the contracting agency for review and that information is provided to the contractor and/or District management. The phone system is maintained by the corporate offices of the contractor.

Passenger/Public Input

The District also receives safety information from our riders and from the general public. Often times this refers to drivers operating unsafely or speeding. These calls provide additional information to the system and we are able to use camera systems or drive-cam data to verify if these concerns are valid or whether they may have had mitigating circumstances.

Safety Responsibility and Task Matrix

<p>Additional Accountability</p> <p>Local Staff Responsibility</p>	<p>To ensure safety responsibility and accountability throughout the organization from local operations to corporate management, the District’s third-party contractor uses the following Safety Responsibility and Task Matrix. Responsibilities are assigned at the local level to Maintenance, Operations, or Human Resources and the responsible person for each is identified.</p>																
	<p>This process ensures that the pertinent safety items are covered, and that each person knows his or her areas of responsibility.</p>																
	<p>Safety Responsibility and Task Matrix</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Responsibilities and Tasks</th> <th style="width: 10%;">OPS</th> <th style="width: 10%;">MNT</th> <th style="width: 10%;">HR</th> <th style="width: 10%;">OTHER</th> <th style="width: 10%;">Responsible Personnel</th> </tr> </thead> <tbody> <tr> <td>Establish annual safety objectives for submission to the GM at the beginning of each fiscal year</td> <td></td> <td></td> <td></td> <td style="text-align: center;">Safety</td> <td style="text-align: center;">Safety Manager</td> </tr> </tbody> </table>						Responsibilities and Tasks	OPS	MNT	HR	OTHER	Responsible Personnel	Establish annual safety objectives for submission to the GM at the beginning of each fiscal year				Safety
Responsibilities and Tasks	OPS	MNT	HR	OTHER	Responsible Personnel												
Establish annual safety objectives for submission to the GM at the beginning of each fiscal year				Safety	Safety Manager												

	Submit a report on the safety performance at the end of each fiscal period				Safety	Safety Manager
	Submit the following: period operations and safety data; accident and incident reports; and site safety review results				Safety	Safety Manager
	The LGM or their designee has the authority to direct that work or conditions have been determined to be unsafe or pose a hazard to customers, employees, contractor employees, the general public, or endangers the safe passage of buses, be suspended or restricted until the unsafe condition or hazard can be mitigated or corrected				Safety	Safety Manager
	Management of system safety, occupational health and safety, accident and incident investigation, environmental protection and monitoring the implementation of the Safety Management System (SMS) Program Plan				Safety	Safety Manager
	Review of all safety aspects of departmental procedures including: policies/instructions; Standard Operating Procedures; HR policies; safety and health policies				Safety	Safety Manager
	SMS Review and Modification				Safety	Safety Manager

	Safety Solutions Team Meetings				Safety	Safety Manager
	Daily Safety & Health Walkthrough				Safety	Safety Manager
	Safety related reports to external agencies				Safety	Safety Manager
	Near miss and route hazard report investigations				Safety	Safety Manager
	Investigation of safety related trends				Safety	Safety Manager
	Coordination with United States and State Departments of Labor and Occupational Safety and Health Administration (OSHA)				Safety	Safety Manager
	Environmental Management Oversight				Safety	Safety Manager
	Hazard Management Process				Safety	Safety Manager
	Managing Safety Validation of Change Process				Safety	Safety Manager
	Safety Data Reporting				Safety	Safety Manager
	Investigations				Safety	Safety Manager
	Advise to update SOPs, Rules, and Emergency Plans	Ops				General Manager
	Emergency Response				Safety Manager	Safety Manager
	Fire Protection				Safety Manager	Safety Manager
	Shop Safety Hazardous Tools Inspections		MNT			Maintenance Manager

	Review Vehicle Maintenance and Failure Data		MNT			Maintenance Manager
	Perform Vehicle Maintenance Inspections/Audits		MNT			Maintenance Manager
	Training, Certification, Review, and Audit				Safety Manager	Safety Manager
	Personal Protective Equipment Review				Safety Manager	Safety Manager
	Hazardous Materials Management				Safety Manager	Safety Manager
	Drug and Alcohol Abuse Program				Safety Manager	Safety Manager
	Procurement	Ops				General Manager

Anti-Retaliation Policy

In order to support employees and third-party contractors and to further encourage them to report unsafe conditions, the District has an anti-retaliation policy. This policy allows individuals to raise concerns regarding behavior, working conditions, equipment and other potential hazards without fear of harassment, retribution or retaliation. By doing so the agency is able to have more eyes and ears throughout the workplace to better identify problems and issues in the workplace in advance of them causing injury to a passenger or employee. This policy contributes to employee engagement and contributes to a positive workplace culture.

Employee Behavior Excluded from Protection

It must be noted that while the District encourages employees to share safety concerns to agency management and in doing so should not fear retribution, however, certain employee behaviors if reported may result in disciplinary actions and would not be covered by reporting protections. These behaviors include:

- Any violation of any law, rule or regulation
- Gross mismanagement
- Gross waste of funds
- Abuse of authority
- Substantial and specific danger to public health or safety

- Disclosure beyond a reasonable doubt, an illegal act, gross negligence or a deliberate or willful disregard of regulations and procedures.

In such cases as specified above, the employee is willfully and knowingly participating in an illegal or deliberate disregard for the rule of law and as such shall not be subject to standard protection language.

Section 5 – Safety Risk Management (SRM) Process §673.25 (a)

Safety Risk Identification §673.25 (b)(1) and (2)

FTA defines a hazard in 49 C.F.R. §673.5 as “any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.” These hazards have the potential, if unchecked, to cause harm or adverse effects to the District, its passengers, personnel and property.

To identify potential safety risks, the District employs a number of techniques designed to utilize both proactive and reactive measures for safety improvement. FTA and CTDOT as well as District safety personnel provide input into the identification through regulatory changes, notices and agency updates. Potential consequences of hazards are also identified as part of the notification process. This information is provided to the CSO who logs the hazards electronically in a safety folder. The CSO reviews the folder and new regulations on an annual basis to ensure that new regulations are followed for compliance. Once identified, risks are assessed and evaluated based on level of severity and likelihood of an event. Based on these criteria, safety risks are classified on a risk acceptance scale which allows the agency to make strategic decisions based on agency constraints regarding where to invest time and effort to avoid the most likely and extreme safety events.

Safety Risk Assessment §673.25 c (1) and (2)

Once they have been identified, hazards are then categorized into the severity levels ranging from catastrophic to negligible. The categorization of hazards is consistent with risk-based criteria for severity as it reflects the principle that not all hazards pose an equal amount of risk to personal safety. By developing tiered categories of risk, the agency can make judgements regarding the potential impact of a risk on the population.

Categories

Category 1 – Catastrophic: operating conditions are such that human error, design deficiencies, elements, subsystem or component failure, or procedural deficiencies may cause death or major system loss and require immediate termination of the unsafe activity or operation.

Category 2 – Critical: operating conditions are such that human error, subsystem or component failure, or procedural deficiencies may cause severe injury, severe occupational illness, or major system damage and require immediate corrective action.

Category 3 – Marginal: operating conditions are such that they may result in minor injury, occupational illness or system damage and that human error, subsystem or component failures can be counteracted or controlled.

Category 4 – Negligible: operating conditions are such that human error, subsystem, component failure or procedural deficiencies will result in less than minor injury, occupational illness, or system damage.

The next step in assessing the hazard is to determine the likelihood of it occurring. Likelihood is determined based on the analysis of transit system operating experience, evaluation of safety data, the

analysis of reliability and failure data, and/or from historical safety data from other passenger bus systems.

Likelihood Matrix

The following chart describes the likelihood of an event happening.

Likelihood of Occurrence of a Hazard			
Description	Likelihood Level	Frequency for Specific Item	Selected Frequency for Fleet or Inventory
Frequent	A	Likely to occur frequently	Continuously experienced
Probable	B	Will occur several times in the life of an item	Will occur frequently in the system
Occasional	C	Likely to occur sometime in the life of an item	Will occur several times in the system
Remote	D	Unlikely but possible to occur in the life of an item	Unlikely but can be expected to occur
Improbable	E	So improbable, it can be assumed occurrence may not be experienced	Unlikely to occur but possible

Identified hazards are placed into the following Risk Assessment Matrix to enable the decision makers to understand the amount of risk involved in accepting the hazard in relation to the cost (schedule, cost, operations) to reduce the hazard to an acceptable level.

Risk Assessment Matrix

Hazard Frequency	Severity Category 1	Severity Category 2	Severity Category 3	Severity Category 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
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Based on District policy and the analysis of historical data, the following are determinations regarding risk acceptance.

Risk Acceptance Matrix

Hazard Risk Index	Criteria by Index
1A, 1B, 1C, 2A, 2B, 3A	Unacceptable
1D, 2C, 2D, 3B, 3C	Undesirable
1E, 2E, 3D, 3E, 4A, 4B	Acceptable with Management Review
4C, 4D, 4E	Acceptable without Management Review

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

- **Unacceptable:** The hazard must be mitigated in the most expedient manner possible before normal service may resume. Interim corrective action may be required to mitigate the hazard to an acceptable level while the permanent resolution is in development.
- **Undesirable:** A hazard at this level of risk must be mitigated unless the Location General Manager and Location Safety Manager issue a documented decision to manage the hazard until resources are available for full mitigation.
- **Acceptable with review:** The Location General Manager and Location Safety Manager must determine if the hazard is adequately controlled or mitigated as is.
- **Acceptable without review:** The hazard does not need to be reviewed by the management team and does not require further mitigation or control.

Risk Mitigation and Reduction Program §673.25 (d)

Risk mitigation is the process of reducing the risk to the lowest practical level given agency constraints. The District recognizes that not all safety risks can be eliminated completely and for that reason, resolution of hazards will utilize a risk assessment and process so that the most damaging and common hazards will be prioritized.

The objectives of the risk mitigation and reduction process are to:

- Identify hazard solutions including changes to system design, installation of safety devices or development of special procedures.
 - This includes measures to reduce visibility impairments for bus operators.
- Resolve hazards that involve interfaces between two or more systems.
 - This includes measures to reduce risk of assaults against drivers or transit workers.
- Ensure system solutions do not create new hazards.

The District's third-party contractor, through oversight of the CSO, is responsible for local safety review and uses the following methodologies to assure that system safety objectives are implemented through design and operations, and that as a result, hazards are eliminated, mitigated or controlled:

Design to eliminate or minimize hazard severity	To the extent permitted by cost and practicality, identified hazards are eliminated or controlled by the design of equipment, systems and facilities
Design of protective safety features or devices	Hazards that cannot reasonably be eliminated or controlled through design are controlled to the extent practicable to an acceptable level through the use of fixed, automatic, or other protective safety design features or devices.
Training and functional checks	Provisions are made for periodic functional checks of safety devices and training for employees to ensure that system safety objectives are met.
Warning systems	When design and safety devices cannot reasonably nor effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons to the hazard.
Hazard control	Where it is impossible to reasonably eliminate or adequately control a hazard through design or the use of safety and warning devices, procedures and training are used to control the hazard.

In addition to the above risk mitigation processes, precautionary notation is standardized for clarity and consistency. For safety-critical issues requiring training and certification of personnel, the District oversees third-party contractors through its CSO oversight of contracts and during weekly contractor meetings to ensure the measures are being met.

Assaults on Transit Workers

The District began tracking driver assaults in 2020. Since that time, no driver or transit work assaults have been reported. Each paratransit vehicle comes equipped with a COVID barrier, which doubles as a risk reduction measure for protecting drivers from passengers if they were to become unruly. Additionally, this barrier would prevent unwanted access from a passenger into the driver's area.

In the event that there are driver or transit worker assaults in the future, the safety committee shall consider if a risk analysis shall be performed to determine what other measures could be taken to reduce the number and severity of assaults.

Vehicular and Pedestrian Accidents

The District is proud to report zero pedestrian accidents over the past 5 years, and very few vehicular accidents. Drivers are thoroughly (and continuously) trained to prevent accidents with pedestrians and vehicles. In the event there is a vehicular accident, the third-party contractor conducts an investigation. Part of this investigation is to determine if there were any visibility impairments reported by the driver that may have contributed to the accident.

Additionally, there are measures in place to prevent any visibility impairments prior to a driver leaving the lot. Part of the Pre-Trip Checklist is to check the vehicles for any visibility impairments. If it is determined that there may be a visibility issue, the driver is required to bring the vehicle to the maintenance bay and clean the windows, or respond to any other issue.

Infectious Disease

The District's third-party operator developed and continuously updates their infectious disease risk reduction program. The program identifies strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions. This program is consistent with guidelines of the Centers for Disease Control and Prevention and minimizes exposure to infectious diseases. Some of these policies/plans included, but are not limited to:

- Dispatch Procedures During an Infectious Disease Outbreak
- Masks
- Fare Handling
- Vehicle Cleaning
- Return to Service
- Return to Work – Employee Checklist

Safety Committee Responsibilities and Findings

Since the development of the PTASP Safety Committee in July 2022, the group has met monthly to discuss the items listed below. Moving forward, this group intends to meet quarterly starting in 2023 to keep the dialogue open with frontline workers, management and other District and operator staff.

1. Identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment.
 - The committee identified the risk of slip and falls between parked buses during the winter, when the icing can be difficult to see in the late/very early hours when it is dark. The group determined that the solution is for staff to walk the grounds and lay additional salt in these locations during the winter to minimize this risk and prevent injury.
 - The committee agreed that the safety risk assessment is comprehensive and no other changes are required at this time. No additional mitigation measures or strategies have been identified.

- There are weekly Safety Solutions Team (SST) meetings held by the third-party contractor, where safety concerns or issues can be brought up and addressed immediately.
2. Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended.
- The committee reviewed the third-party contractor's Business Continuity Plan for the Greater Hartford Transit District. This plan includes all Mission Essential Functions as guidelines for action and who is responsible for each action.
 - A subcommittee including the Assistant General Manager, dispatch, and members of the Safety Committee convened to review these plans and policies and brought comments back to the full Safety Committee.
 - The following comments were made:
 - Based on the review and comments from the subcommittee and safety committee, the Business Continuity Plan was updated by the third-party contractor.
3. Identifying safety deficiencies for purposes of continuous improvement.
- A subcommittee of the Safety Committee met and discussed safety deficiencies.
 - One safety concern that had been discussed by Greater Hartford Transit District and the third-party contractor was Employee Safety and that there may be a need for security around the exterior of the building/parking lot at the ADA Paratransit Operations and Maintenance Facility during the late night/early morning hours.
 - The District agrees that the safety of the third-party contractor's employees is of the utmost importance. In response to this risk, the District has ordered a security booth, is currently out to bid for a security contractor to monitor the lot, and is working on quotes to fit up the booth with data, electric, and security monitors. The District anticipates that the booth will be up and running and staffed with a security guard by mid to late December 2022.
 - Additional safety deficiencies that were identified all related to winter weather.
 - The subcommittee developed a risk reduction program comprised of the following measures:
 - The District is purchasing LED signs to install that will display safety messages to drivers prior to pulling out of the facility.
 - Drivers will arrive 5 minutes early to work when winter weather begins.
 - All employee contact info will be updated.
 - Emergency Staff: Road supervisors will determine what staff members are required during weather emergencies.
 - No points (or demerits) will be given to drivers if severe weather is determined to be the cause of an issue.
 - Action plans will be completed the day prior to a storm in preparation.

- Staff will make sure there is an adequate amount of salt ordered to de-ice for the duration of the winter season.
- Flashlights: staff is exploring the purchase of headlamps/flashlights for staff use for winter due to slippery conditions and less daylight.
- IVR: staff will send messages to passengers a few minutes prior to arrival so they can be ready for pick-up.
- Shoe grips will be purchased and made available to staff during the winter in an effort to reduce slips and/or falls.
- Information will be posted near the shoe grips to alert staff to whether or not they should use snow scrapers or shoe grips that day.

Section 6 - Safety Assurance §673.23

Safety assurance refers to the internal processes that allow for the collection, analysis and assessment of information as it relates to the District's PTASP. Components of the safety assurance for monitoring and measuring include:

- Assessing systems for compliance with procedures for operations and maintenance
- Monitoring to identify the effectiveness of safety risk mitigation including identification of safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended.
- Describing activities to conduct investigations of safety events including the investigation of casual factors.
- Monitoring information from internal safety reporting program.

Assessing Systems for Compliance with Procedures for Operations and Maintenance

The District and its third-party contractor provide staffing and expertise to oversee safety of the operation. In addition to a Location General Manager (LGM) and a Location Safety Manager (LSM), the District also relies on Supervisors, dispatchers and Instructors who provide oversight of daily operations and training for the agency. All safety risks are reported to the LGM and LSM.

The District also has a Safety Solutions Team which use the following methodologies to ensure a proactive approach to safety within agency operations:

- Routine hazard management
- Accident and incident investigation
- Safety data collection and analysis
- Routine internal safety audits
- Facility, equipment, systems and vehicle inspections
- Routine proficiency checks for all vehicle operators and maintenance employees
- Compliance evaluations including onsite inspections
- Regularly communicating safety and hazard data to all employees

In addition to local on-site management, the District's third-party contractor also employs corporate resources including a Regional Safety Manager, Regional Safety Director, Regional Maintenance Director and a Regional Vice President. This team brings high-level insight and experience from other locations so that the District can benefit from best practices and lessons learned regarding safety practices.

Finally, the District also receives additional oversight from executive level corporate managers including the Vice President of Safety and the Vice President of Maintenance who provide a further layer of review and expertise of the District's safety program.

Monitoring to identify the effectiveness of safety risk mitigation including identification of safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended.

The District and its third-party contractor rely on various sources of data to evaluate the effectiveness of safety risk mitigations to determine if they are effective, appropriate and being implemented as intended. One particularly relevant source of information regarding this is the use of accident reporting information. District drivers and supervisors use accident reporting forms to document conditions at all

accident sites. Included on these forms are opportunities for the reporter to note specific information regarding conditions surrounding the accident. These reports are later reviewed internally to determine if there are any patterns or casual factors which could contribute to the event.

Similarly, reviews of internal or third-party safety reviews/audits are also tapped as sources to determine the efficacy of the District's safety programs. These reports provide opportunities to analyze safety data to identify emerging safety concerns or to address existing issues.

The District also listens and follows up with input from our customers and workforce. Suggestions from drivers and system users often times can result in benefits to agency operations, as the real time observations provide insight into the improvements.

Describing activities to conduct investigations of safety events including the investigation of casual factors

The primary sources of information on the causal effects of safety events are accident and incident reporting forms and DriveCam coaching events. District drivers and supervisors use accident reporting forms to document conditions at all accident sites at the time of the event or when an incident is reported. Included on these forms are opportunities for the reporter to note specific casual information regarding conditions surrounding the accident, such as weather or road conditions. These reports are later reviewed internally to determine if there are any patterns or casual factors which could contribute to the event. All accident and incident reports are saved on site by the safety manager and trends are monitored on an ongoing basis. DriveCam incidents are stored electronically for reporting purposes. Any patterns of causal factors which may contribute to future events are reviewed through the safety risk management process. The District installed additional vehicle cameras (5 per vehicle) in 2020/2021 that record all the time, not just safety events. These videos can be wirelessly downloaded. Since that time, all new rolling stock comes equipped with 5 cameras (1 exterior, 4 interior). Vehicle orders placed in 2022 and on will have 6 cameras (2 exterior, 4 interior).

Monitoring information from internal safety reporting programs

The District tracks trends through the NTD program and through data collection in this PTASP, which shows five years of data for key safety performance metrics. This information is reviewed annually as part of the certification and assurances program and allows the District to ~~adjust the plan to better~~ conform with agency target goals.

The AE, CSO and Safety Solutions Team meet monthly and routinely review the safety information reports. The AE and CSO review safety information during weekly contractor meetings, which include all department managers from the third-party contractor team. Information can include employee safety reports, customer complaints and other safety communication channels. Safety concerns are investigated or analyzed and the results of the investigation are discussed during subsequent meetings until the issue is considered resolved.

The CSO and safety solutions team also review internal and external reviews including audits and assessments, compliance with procedures, and the effectiveness of safety risk mitigation measures. The CSO discusses relevant safety concerns with the AE to determine resolution.

Management of Change

Safety management is continually evolving and the District as an agency is working to stay on top of new challenges as they relate to safety. The District employs a centralized process to manage change with the primary vehicle to achieve this being a weekly meeting between the contractor and the District. During this time, the District and the District's third-party contractor meet to review critical aspects of operations including safety. The weekly meeting includes members of the District's leadership team including the District's CSO who attends each meeting and oversees safety issues.

The management of change includes being able to review and respond to safety issues associated with new programs or policies identified by the District for implementation. It also includes situations in which environmental safety has shifted. In the Spring of 2020, the District faced the challenge of COVID-19, a new strain of corona virus which resulted in the development of new cleaning and operational protocols to address safety needs. Since that time, the District's third-party contractor has developed numerous policies that minimize the exposure of the public, personnel, and property to hazards and unsafe conditions, which are consistent with guidelines of the Centers for Disease Control and Prevention or a State health authority.

These changes were acknowledged quickly and in collaboration with District third party operators, peer organizations and identified best practices were implemented rapidly throughout District operations. Future enhancements will also be part of an environment of change with new hazards being brought to the attention of the CSO, who will work with our team of agency experts and operational staff to develop solutions and mitigations to potential hazards.

As new programs, projects and policies are introduced at the District the CSO will continue to assess the impacts of the new development on existing operations drawing on input from available experts, data and internal sources. The CSO will then make recommendations to the AE, who in consultation with the CSO will determine a recommended course of action for the organization.

Continuous Improvement



The District's top priority is to provide transportation to passengers and employees safely. For this reason, the District and our third-party contractor continually review our operations to ensure that we improve safety measures whenever possible. Safety is a topic which is addressed on a weekly basis at the District's weekly meeting with the agency's third-party contractor. During this time, the joint team, led by the CSO, reviews relevant safety incidents, suggestions, and new safety protocols. The team uses a variety of tools to gather data for continuous improvement as shown in the preceding graphic.

In addition to these internal methods, under the direction of the Accountable Executive, the District and its third-party contractor regularly bring in new expertise through relevant training modules or new protocols. For example, during the corona virus pandemic the District sought out industry experts and instituted best practices in cleaning, operations, and PPE usage to improve passenger and driver safety.

Assessing Safety Performance

The District and its third-party contractor use a number of tools to assess the safety performance of its operations. One of these tools is ongoing data trends. The agency looks at past performance in terms of key performance indicators such as accidents and injuries, miles between failures, etc. to determine if the agency is performing within acceptable safety standards.

An additional assessment tool employed by the agency's third-party contractor is its comparison against other properties that it operates. The third-party contractor also conducts audits by internal corporate auditors to ensure that the site location is adhering to the practices identified in the District's contracts and company's policies. In addition, third party external auditors are also used to assess safety performance of the third-party contractor.

Process to Address Identified Safety Deficiencies

Under the direction of the Safety Committee, the AE, the District and its third-party contractor employ several tools to address identified safety deficiencies. As noted in the previous section, the agency's third-party contractor compares performance of each of the properties it oversees. If a particular property is not performing at the same level as other properties, the contractor's main office sends in specialists to assist in remedying the situation. This peer assessment coverage helps all properties within the corporate structure learn best practices from one another and raise safety across the industry. The PTASP Safety Committee has recently been developed and will meet quarterly throughout the year to keep an ongoing discussion about safety, risks, improvements, etc. Additionally, the third-party contractor meets monthly to keep an open dialogue about safety incidents, deficiencies, mitigation strategies, etc.

Section 7 - Safety Promotion – Training and Communication §673.29(a)

The District is proud of its safety record. To meet its objective of continuous improvement, the District's third-party contractor maintains a robust training program both for new hires as well as continuing safety education and training for more seasoned third-party contractor employees. Training, coupled with a wide range of safety communication tools, keeps safety at the forefront of our employees and third-party contractors' minds on a daily basis.

New employees of the District's third-party contractor receive initial (new hire) training which extends over the period of employment. Refresher training is provided on a periodic basis to emphasize new areas of focus or to target specific actions for a driver, such as in the case of an accident or mishap.

Third-party contractor services have implemented a new training regimen to include changes to Classroom Training and Skills Course Training (formerly called Closed Course training). (See Training Matrix in Appendix A). The new training regimen is called Professional Operator Development Program (PODP for short). This training includes more vocal communication between the third-party trainee and trainer. Classroom training will also include more participation from both the Trainee and the Trainer to ensure a better understanding of what is to be expected from the trainee when their training has been completed. A 50-question test is administered at the end of their classroom training, which must be passed in order to continue on in the training. All classroom training is logged in the trainee workbooks. A trainee, while on the Skills Course training, must successfully complete an exercise at least 3 times correctly before they will be considered "Competent". The trainee must be Competent in all areas of the Skills Course Training in order to move on to the road training. Each exercise is scored and recorded in the trainee workbooks.

Third-party contractor drivers also receive initial training following the Transportation Safety Institute (TSI) Vehicle Operations Program and the National Safety Council (NSC) training which provides extensive safety training in the following areas:

- Bus Inspections
- Bus Maneuvers
- Intermediate Bus Maneuvers
- Service Stops
- Special Conditions
- Operating on Expressways and Freeways
- Special Driving Problems
- Defensive Driving
- Accident Follow Up
- Report Writing
- Transit Security - See Something/Say Something
- The Operator and Safety
- De-escalation training

New hires and experienced employees also receive training on reporting hazards. The District's third-party contractor provides employees with reporting materials so that hazards may be addressed

promptly. Drivers report a hazard and the reports are distributed to the appropriate person for resolution.

The District's third-party contractor has a Location Safety Manager (LSM) who oversees compliance with training programs and who ensures that the District is following their safety programs including aspects of this PTASP. The LSM works closely with the District's CSO and performs a number of critical tasks within the PTASP including:

- Auditing operational safety efforts
- Reviewing accident and injury claims
- Tracking and assessing performance statistics.

The LSM has the authority to request additional contracted resources from the contractors corporate resources to address any specific deficiencies found on the local level.

Third-party contractors also tap additional training resources as necessary including:

- American Red Cross - Bloodborne pathogen training
- Emergency Management Training
- CONN-OSHA – Housekeeping and Storage Training

Maintenance Personnel

All District third-party contractors performing maintenance functions receive safety training on use of equipment, personnel protective equipment (PPE) and any additional areas such as handling of hazardous materials training from their supervisor prior to performing the function.

Dispatchers

Dispatchers are required to attend classroom training which includes all safety policies and procedures relative to the dispatch function. In addition, dispatchers spend additional classroom time learning customer service techniques and Safe Work Methods.

For dispatchers who have access to a company vehicle, additional training includes the Smith System training and emergency management system. They would also be required to complete road training which would include Skills course training (10 hours), BTW Training (24 hours) and Cadet Training (24 hours) and a final evaluation (1 hour).

Road Supervisors

Road Supervisors go through the same training as an Operator which includes Classroom Training (32 hours), Skills Course (10 hours), BTW Training (24 hours), Cadet Training (24 hours) and a final evaluation (1 hour).

In addition, Road Supervisors must complete numerous training segments in First University related to roles of a Supervisor to ensure their preparedness for the job as well as a hands-on training program overseen by the third-party Safety Manager.

All documents necessary for road supervisors to complete their job are kept in a binder with instructions specifying the proper way to fill out the documents.

New Managers

The third-party contractor provides all new managers with Policies and Procedures and requires them to complete a curriculum in the vendors in-house training program called "First University."

All Employees

Upon hire, all employees are shown Safety Protocols that are specific to the District location, such as the maintenance shop, yard, building and parking lot area.

Training Needs Assessment

The District and its third-party contractors use a variety of tools to assess safety training. The primary tool that is used to assess training needs is data. The LSM in coordination with the CSO reviews safety data on key performance indicators on an ongoing basis. If trends occur, a spike of incidents occurs, or a new hazard occurs, such as the COVID 19 virus; the LSM will identify appropriate training to improve safety in this area. The LSM also provides information on District metrics so that they can be compared with peer systems operated in other locations by the contractor. If the District's data shows a need for additional training, the third-party contractor will request additional resources from its corporate offices to meet that need.

Technological enhancements such as video and DriveCam event recorders also provide additional information, which is used to assess the training needs of on the road actions of operators. Should an operator trigger too many DriveCam events such as hard stops, speed infractions, or following distance infractions, the driver can be tapped for remedial training on targeted areas. This allows the agency to identify the issue in advance of an accident or an event simply by monitoring driver behavior. Beginning in 2020, all new paratransit vehicles purchased will be equipped with 5 additional cameras that will record the interior and exterior of the vehicles at all times while operating.

The third-party contractor also meets with its insurers to assess claims. The agency pays close attention to this metric. If premiums are increasing the District recognizes that additional training may be warranted in certain claims areas such as workers comp, small strikes or collisions.

The LSM uses all of these tools to develop the program of training for enhanced safety at the District.

Safety communication §673.29(b)

Consistent with the District's policy to promote safety through communication, the District uses a wide range of methods to ensure that safety messages reach all relevant individuals in ways that are clear, consistent and a part of the District's culture.

The District currently uses the following methods to communicate safety information:

Passengers and the General Public

<i>Website</i>	On occasion, the District posts safety information for the general public on its website at https://www.hartfordtransit.org . Recently posted information includes information about enhanced safety measures taken as a result of COVID 19 as well as information of safety precautions that passengers can take to protect themselves. A copy of the District's PTASP and relevant safety information will be posted on the website for public information.
<i>Message Boards</i>	The District and its third-party contractor use various message boards to provide important messages, including messages regarding safety and at its key terminal locations. Use of this form of communication provide passengers with real-time, relevant information on safety issues.
<i>Postings</i>	On occasion, the District and its third-party contractor may post safety information in areas that are frequented by system users. These postings may be on board vehicles or in District facilities, such as Union Station.

District and Third-Party Contractor Employees

<i>Training</i>	Safety is included as part of the training for each relevant job function at the District. Information regarding safety is included throughout each of these training sessions to ensure that individuals can complete their jobs safely and without incident.
<i>Bulletin Boards</i>	The District and its third-party contractors use bulletin boards as a central messaging center to post important and relevant notices including information regarding safety. Centrally located, the bulletin boards create a known and frequented space for pertinent safety information. Bulletin boards are also a location in which results of the resolution of safety issues will be posted.
<i>Email</i>	Each employee of the District and certain members of its third-party operating company may receive safety notices through e-mail notification. Email allows the sender to quickly and easily distribute information to every individual.
<i>Mailboxes</i>	Each employee at the District as well as employees of third-party contractors have mailboxes in which the District can provide written information regarding the District's safety program. This information may include areas of special focus, new policies and procedures or information regarding the resolution of previous safety issues.
<i>Newsletters/Bulletins</i>	The District's third-party operator produces newsletters and bulletins for its employees and District staff which provide information regarding corporate and site-specific safety initiatives.

- Weekly Meetings* The District and its third-party contractor hold weekly meetings to discuss a wide variety of subject matters regarding operations and including all safety matters. Each of these meetings provides opportunities for the District to communicate its message of safety and compliance throughout the team. The meetings are attended by the District's AE and CSO as well as by key members of the District's safety leadership team.
- First Message Board* The Third Party Contractor also utilizes a message board system to provide safety information bulletins from corporate, based on industry trends as well as site specific information such as days between accidents and employee injuries. This format keeps safety in the forefront of employees' minds on a daily basis.
- Safety Solution Team Meeting Minutes* The Safety Solutions Team, which includes individuals from a variety of job functions, meets monthly to address local safety issues and discuss safety issues and resolutions. Meeting minutes are posted on site at the property.
- Monthly Safety Meetings* All employees meet monthly to discuss local and industry safety programs. This meeting reinforces safety and time is provided to review local safety issues. These meeting often include safety pep rallies to reinforce and focus on key safety components.
- Quarterly Safety Committee Meetings* The safety committee will meet quarterly to discuss any safety issues, mitigation strategies, risk reduction, etc. This meeting reinforces safety and allows for time to review local safety issues.

This suite of communication tools provides the District's passengers, employees and third-party contractors with a multi-pronged approach to communicating safety information. The tools used by the District are simple, easy to use and access and are effective in providing safety information.

Additional Information

Supporting Documentation

The District and its contractor will maintain documentation related to the implementation of its SMS including the programs, policies and procedures used to create and implement this PTASP and the results from its SMS processes and activities for three (3) years after creation.

This documentation will be available to the Federal Transit Administration or other Federal oversight entities upon request.

Definitions

The District's Public Transportation Agency Safety Plan uses a variety of terms specific to this document including the following:

Accident	An event that involves the following: a loss of life, a report of a serious injury to a person, a collision of public transportation vehicles, a runaway train, an evacuation for safety reasons, or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
Accountable Executive	A single identifiable person who has the ultimate responsibility for carrying out the PTASP of a public transit agency; responsible for carrying out the Agency's Transit Asset Management Plan, and control of direction over the human and capital resources needed to develop and maintain both the agency's PTASP, in accordance with 49 USC 5329 (d), and the agency's Transit Asset Management Plan in accordance with 49 USC 5326.
Chief Safety Officer	An adequately trained individual who has responsibility for safety and reports directly to a transit agency's Chief Executive Officer, General Manager, President, or equivalent Officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.
Equivalent Authority	An entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under USC Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's PTASP.
Event	Any accident, incident or occurrence.
FTA	The Federal Transit Administration, an operating administration within the United States Department of 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 a public transportation system, or damage to the environment.
Incident	An event involving any of the following: a personal injury that is not a serious injury, one or more injuries requiring medical transport, or damages to facilities, equipment, rolling stock, or infrastructure that disrupts the operation of a transit agency.
Investigation	The process of determining the casual and contributing factors of an accident, incident or hazard, for the purpose of preventing reoccurrence and mitigating risk.

National Public Transportation Safety Plan	The national plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 USC 53.
Occurrence	An event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
Operator	Provider of public transportation as defined under 49 USC 5302 (14)
Performance Measure	An expression based on a quantifiable indicator, performance or condition that is used to establish targets and assess progress toward meeting the established goals.
Performance Target	A quantifiable level of performance or condition expressed as a value for the measure to be achieved within a time period required by the Federal Transit Administration.
Public Transportation Agency Safety Plan	The documented comprehensive safety plan for an agency that is required by 49 USC 5329.
Risk	The composite of predicted severity and likelihood of the potential effect of a hazard.
Risk Mitigation	A method or methods to eliminate or reduce the effects of hazards.
Safety Assurance	Processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis and assessment of information.
Safety Management Policy	A transit agency's documented commitment to safety which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees with regard to safety.
Safety Management System (SMS)	The formal, top-down organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
Safety Management System Executive	Chief Safety Officer or equivalent
Safety Performance Target	A performance target related to safety management activities.
Safety Promotion	A combination of training and communication of safety information to support the SMS as applied to the transit agency's public transportation system.
Safety Risk Assessment	The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety Risk Management	A process within a transit agency's PTASP for identifying hazards and analyzing, assessing and mitigating safety risk.
Serious Injury	Any injury which (1) Requires hospitalization for more than 48 hours, commencing from within 7 days from the date the injury was received. (2) Results in the fracture of any bone except simple fractures of fingers, toes or noses. (3) Causes severe hemorrhages, nerve, muscle or tendon damage (4) Involves any internal organ (5) Involves second or third degree burns or any burns affecting more than 5% of the body surface.

Small public transportation provider	A recipient or subrecipient of federal financial assistance under 49 USC 5307 that has 100 or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system. (Note: The District is not a small public transportation provider.)
State of Good Repair	The condition in which a capital asset is able to operate at a full level of performance.
State Safety Oversight Agency	An agency established by a state that meets the requirements and performs the functions specified by 49 USC 5329€ and the regulations set forth in 49 CFR part 674.
Transit Agency	An Operator of a public transportation system.
Transit Asset Management Plan	The strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating and replacing transit capital assets to manage their performance, risks and costs for the operation of reliable public transportation as required by 49 USC 5326 and 49 CFR Part 625.

List of Acronyms

ADA	American's with Disabilities
AE	Accountable Executive
ASP	Agency Safety Plan
CRCOG	Capital Region Council of Governments
CSO	Chief Safety Officer
CTDOT	Connecticut Department of Transportation
District	Great Hartford Transit District
FTA	Federal Transit Administration
GHTD	Greater Hartford Transit District
HR	Human Resources
LGM	Location General Manager
LSM	Location Safety Manager
L RTP	Long Range Transportation Plan
MNT	Maintenance
MPO	Metropolitan Planning Organization
NTD	National Transit Database
NPTASP	National Public Transportation Safety Plan
NSC	National Safety Council
OPS	Operations
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
PTASP	Public Transportation Agency Safety Plan
SMS	Safety Management System
SOP	Standard Operating Procedure
SPT	Safety Performance Target
SRM	Safety Risk Management
SST	Safety Solutions Team
STP	Surface Transportation Program
TAM	Transit Asset Management
TIP/STIP	(State)Transportation Improvement Program
TSI	Transportation Safety Institute

Supporting Documentation/Additional Resources

Federal Register Final Rule – <http://www.govinfo.gov/content/pkg/FR-2018-07-19/pdf/2018-15167.pdf>

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

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

APPENDIX A

Training Matrix

Training Matrix – Classroom

Unit 1 - Introduction	6.50
Welcome and Introduction	
HIPAA	
Fraud, Waste and Abuse	
Title VI Civil Rights Act 1964	
Employee Handbook	
BeSafe - Making Safety Personal	
Hazardous Communication	
Bloodborne Pathogens	
ELDT Requirements (if applicable)	
CT Harassment Training	
Unit II - Fundamentals	10.00
Safe Work Methods	
Basics of Safety	
Managing Emergencies	
Security Awareness	
Map Reading	
Communication Devices	
Navigation and Fare Policies	
Smith System	
DriveCam Orientation	

Unit III - The Operator	3.00
Drug and Alcohol Awareness	
Distracted Driving	
Fatigue and Sleep Apnea Awareness	
Unit IV - Transporting Passengers with Disabilities	10.50
Transporting Passengers with Disabilities	
Interacting with Passengers	
Diffusing Conflict / De-escalation Techniques	
Passenger Care While Loading and Unloading	
Mobility Aids and Devices	
Elder Abuse	
Unit V - Driving Fundamentals	4.00
Driving Fundamentals I	
Driving Fundamentals II	
Roadway Types	
Railroad Crossings	



Training Matrix - BTW

Skills Course	10.00	Basic Road Work	4.00
Vehicle Orientation		Smith System	
Pre-Trip Inspection		Intersections	
Seat Adjustment		Service Stops	
Mirror Adjustment		Backing	
Braking, Accelerating and Transmission			
Wheelchair Securement			
Reference Points		Advanced Road Work	10.00
Lane Position		Smith System Commentary Driving	
Right Side / Left Side		Roadways	
Backing Point		Expressway / Highway Driving	
Forward Stop		Intersections	
Pivot Points		Service Stops	
Turning Points		Final Evaluation	
Vehicle Control		Cadet Training	10.00
Straight in Lane			
Left Turn		Total Behind the Wheel Hours	34
Right Turn		Total Classroom Hours	32
Lane Changing - Moving Right or Left		Total Minimum First Transit Hours	66

APPENDIX B

Version Number and Update History

Version	Section/Page	Reason for Change	Date
1	4	Addition of Vicki L. Shotland, Executive Director as responsible party for sign off of annual Certs and Assurances and date of submission in TRAMS.	8/3/20
2	4	Process and timeline for conducting the Annual Review - The CSO and the Director of Grants, Procurement and Contract Administration will jointly review the ASP and update the PTASP safety performance targets by June 1 st of each year. Any changes to the PTASP will be documented and the updated document will be provided to the AE for review and approval. The AE will present the updated plan to the Board of Directors at the District's June Board meeting.	8/3/20
3		Chief Safety Officer changed. Updated staff titles. Updated all Safety Performance Tables to include 2020 data. Updated Safety Responsibility and Task Matrix.	11/4/21
4		Complete update to include requirements of Bipartisan Infrastructure bill	12/15/22
5			
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8			
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