# DULUTH TRANSIT AUTHORITY
# AUGUST 2023 - RESOLUTION NO. 444

Concerning the DTA's Public Transportation Agency Safety Plan:

Whereas, public transit agencies are required by the Federal Transit Administration to have a Public Transportation Agency Safety Plan; and

Whereas, the DTA Board of Directors approved the revised Plan on October 26, 2022; and

Whereas, the Plan requires a further update to include an Infectious Disease Prevention and Control provision in compliance with Federal Transit Administration requirements.

Now, therefore be it resolved, that the DTA Board of Directors hereby approves the DTA's Public Transportation Agency Safety Plan as presented herein.

PASSED AND ADOPTED THIS 30TH DAY OF AUGUST 2023 BY THE BOARD OF DIRECTORS OF THE DULUTH TRANSIT AUTHORITY.

ADOPTED,

_____

DTA Board President


# Public Transportation Agency Safety Plan

Drafted by the Duluth Transit Authority
Safety and Training Department

CREATED: March 30, 2020
LAST UPDATED: August 1, 2023

**PUBLIC TRANSPORTATION AGENCY SAFETY PLAN for**

# DULUTH TRANSIT AUTHORITY

## TRANSIT AGENCY INFORMATION

| | | | |
|---|---|---|---|
| **Transit Agency** | **Name** | | **Address** |
| | Duluth Transit Authority | | 2402 West Michigan Street, Duluth, MN 55806 |
| **Accountable Executive** | **Name** | | **Title** |
| | Rod Fournier | | General Manager |
| **Chief Safety Officer** | **Name** | | **Title** |
| | Mike Ahlin | | Director of Safety and Security |
| **Mode(s) of Service Covered by This Plan:** | | **List All FTA Funding Types (e.g., 5307, 5337, 5339):** | |
| Fixed Route Bus | | 5307,5339 | |
| Paratransit | | | |
| **Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)** | | | |
| Fixed route bus – Directly Operated | | | |
| Paratransit – Directly Operated | | | |
| **Does the agency provide transit services on behalf of another transit agency or entity?** | **Yes** | **No** | **Description of Arrangement(s)** |
| | | **X** | Not Applicable |
| **Transit Agency(ies) or Entity(ies) for Which Service Is Provided** | **Name** | | **Address** |
| | Not Applicable | | |
| | | | |

## PLAN DEVELOPMENT, APPROVAL, UPDATES AND CERTIFICATION

| | | |
|---|---|---|
| **Signature by the Accountable Executive** | **Name** | **Date of Signature** |
| | Rod Fournier | |
| | **Signature** | |
| | | 10/5/2022 |
| **Approval by Board of Directors (or Equivalent)** | **Approving Entity** | **Date of Approval** |
| | Duluth Transit Authority Board of Directors | |
| | **Signature of Chairperson** | |
| | | 10/5/2022 |

## ACTIVITY LOG

8

| **Version Number and Updates**<br>*Complete history of successive versions of this plan* | | | |
|---|---|---|---|
| **Version No.** | **Section/Pages Affected** | **Reason for Change** | **Date Issued** |
| 001 | All | New Document | 5/27/2020 |
| 002 | All | Updated | 10/5/2022 |
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# SAFETY PERFORMANCE TARGETS

**Safety Performance Targets**
*Performance Targets are based on safety performance measures established under the National Public Transportation Safety Plan.*

Targets below are based on the previous 5 years of Duluth Transit Authority's safety performance data.

| Mode Of Transit Service | Fatalities (Total) | Fatalities (Per 100,000 VRM) | Injuries (Total) | Injuries (Per 100,000 VRM) | Safety Events (Total) | Safety Events (Per 100,000 VRM) | System Reliability (VRM/ Failures) |
|---|---|---|---|---|---|---|---|
| **Fixed Route Bus** | 0 | 0 | 3.5 | 0.18 | 5 | 0.26 | 9,200 |
| **ADA/Paratransit** | 0 | 0 | 0.5 | 0.19 | 1 | 0.38 | 188,000 |

**Safety Performance Target Coordination**

Duluth Transit Authority's Accountable Executive shares our ASP, including safety performance targets, with the Metropolitan Interstate Council each year after its formal adoption by the Board of Directors. DTA's Accountable Executive also provides a copy of our formally adopted plan to the Minnesota Department of Transportation. DTA personnel are available to coordinate with Minnesota DOT and the Metropolitan Interstate Council in the selection of Safety Performance Targets upon request.

| | | |
|---|---|---|
| **Targets Transmitted to State** | **State Entity Name** | **Date Targets Transmitted** |
| | Mn Dept of Transportation | 5/28/2020 |
| **Targets Transmitted to Metropolitan Planning Organization** | **Metropolitan Planning Organization Name** | **Date Targets Transmitted** |
| | Metropolitan Interstate Council | 4/20/2020 |

# CONTENTS

Appendix F – Prioritized Safety Risk Log
Appendix G – Safety Performance Matrix

# DEFINITIONS AND ACRONYMS

The following definitions may be used throughout this document and correspond to the definitions provided in 49 CFR 673.5.

**Accident** means an "event", as defined below, that involves any of the following:

1. A loss of life,
2. A report of a serious injury to a person,
3. A collision of public transportation vehicles, or
4. An evacuation for life safety reasons,

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

**Chief Safety Officer** means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

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

**Event** means an "accident", as defined above, or "incident" or "occurrence" (each as defined below).

**FTA** means the Federal Transit Administration, an agency within the United States Department of Transportation.

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

**Incident** means an "event" (as defined above), that involves any of the following:

1. A personal injury that is not a serious injury,
2. One or more injuries requiring medical transport, or
3. Damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

**Investigation** means the process of determining the causal and contributing factors of an "accident", "incident", or "hazard" (each as defined here), for the purpose of preventing recurrence and mitigating risk.

**Metropolitan Interstate Council (MIC)** is the Metropolitan Planning Organization that cooperatively guides transit planning and spending for the Duluth Transit Authority.

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

**Occurrence** means an "event" (as defined above), without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

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

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

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

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

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

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

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

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

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

**Safety performance target** means a Performance Target related to safety management activities.

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

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

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

**Serious injury** means any injury which:

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

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

**State** means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

**State of good repair** means the condition in which a capital asset is able to operate at a full level of performance.

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

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

| | | |
|---|---|---|
| CFR | - | Code of Federal Regulations |
| CSO | - | Chief safety officer |
| FTA | - | Federal Transit Administration |
| MAP-21 | - | Moving Ahead for Progress in the 21st Century |
| NTD | - | National Transit Database |
| PTASP | - | Public transportation agency safety plan |
| SGR | - | State of good repair |
| SMS | - | Safety management system |
| SOP | - | Standard operating procedure |
| TAM | - | Transit asset management |
| U.S.C. | - | United States Code |

# BACKGROUND

The Moving Ahead for Progress in the 21st Century (MAP-21) Act grants the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive regulatory framework to oversee the safety of public transportation throughout the United States. As a component of this safety oversight framework, MAP-21 requires certain recipients of FTA Chapter 53 funding to develop and implement a Public Transportation Agency Safety Plan (PTASP).

In addition to greater safety oversight responsibilities, MAP-21's grant of expanded regulatory authority puts FTA in a position to provide guidance to transit agencies that strengthens the use of safety data to support management decisions, improves the commitment of transit leadership to safety, and fosters a culture of safety that promotes awareness and responsiveness to safety risks. The framework to this approach is called a safety management system (SMS), which moves the transit industry towards a more holistic, performance-based approach to safety. The SMS framework has been adopted by FTA in its National Public Transportation Safety Plan.

The PTASP for Duluth Transit Authority supports and is consistent with an SMS approach to safety risk management. SMS is an integrated collection of policies, processes, and behaviors meant to ensure a formalized, proactive, and data-driven approach to safety risk management. The aim of an SMS is to increase the safety performance of transit systems by proactively identifying, assessing, and controlling safety risks. The approach is meant to be flexible and scalable, so that transit agencies of all types and sizes can efficiently meet the basic requirements of MAP-21. The PTASP for Duluth Transit Authority addresses the following elements, outlined in Table 1 (below):

| | |
|---|---|
| ☐ **Safety Management Policy Statement:** | A policy statement establishing senior management commitment to continual safety improvement, signed by the executive accountable for the operation of the agency and the board of directors. |
| ☐ **Document Control:** | A description of the regular annual process used to review and update the plan including a timeline for implementation of the process. |
| ☐ **Core Safety Responsibilities:** | A description of the responsibilities, accountabilities, and authority of the accountable executive, the key safety officers, and key members of the safety management team. |
| ☐ **Safety Training Program:** | A description of the comprehensive safety training program for agency staff that ensures that staff are trained and competent to perform their safety duties. |
| ☐ **Safety Risk Management:** | A description of the formal processes the agency uses to identify hazards, analyze and assess safety risks, and develop, implement and evaluate risk controls. |
| ☐ **Safety Risks:** | A description of the most serious safety risks to the public, personnel and property. |
| ☐ **Risk Control:** | A description of the risk control strategies and actions that the agency will undertake to minimize exposure of the public, personnel and property to hazards, including a schedule for implementing the risk control strategies and the primary entity responsible for each strategy. |
| ☐ **Safety Assurance:** | A list of defined safety performance indicators for reach priority risk and associated targets the agency will use to determine if it is achieving the specified safety goals. |
| ☐ **Desired Safety Outcomes:** | A description of desired safety outcomes for each risk using the measurable safety performance indicators established. |

***Table 1: Elements of a Public Transportation Agency Safety Plan (PTASP)***

The Duluth Transit Authority PTASP addresses all applicable requirements and standards set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.

# 1 SAFETY POLICIES AND PROCEDURES

## 1.1 COMMITMENT TO SAFETY

Duluth Transit Authority recognizes that the management of safety is a core value of our business. The management team at Duluth Transit Authority will embrace the Safety Management System (SMS) and is committed to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our employees, customers, and the general public. All levels of management and frontline employees are committed to safety and understand that safety is the primary responsibility of all employees.

Duluth Transit Authority is committed to:

- Communicating the purpose and benefits of the SMS to all staff, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization by way of initial and annual trainings, bi-annual safety meetings, employee newsletters, weekly posters on monitors, and daily safety messages.
- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.
- Ensuring that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.
- Establishing safety performance targets that are realistic, measurable, and data driven.
- Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.

## 1.2 ANNUAL PTASP REVIEW AND UPDATE

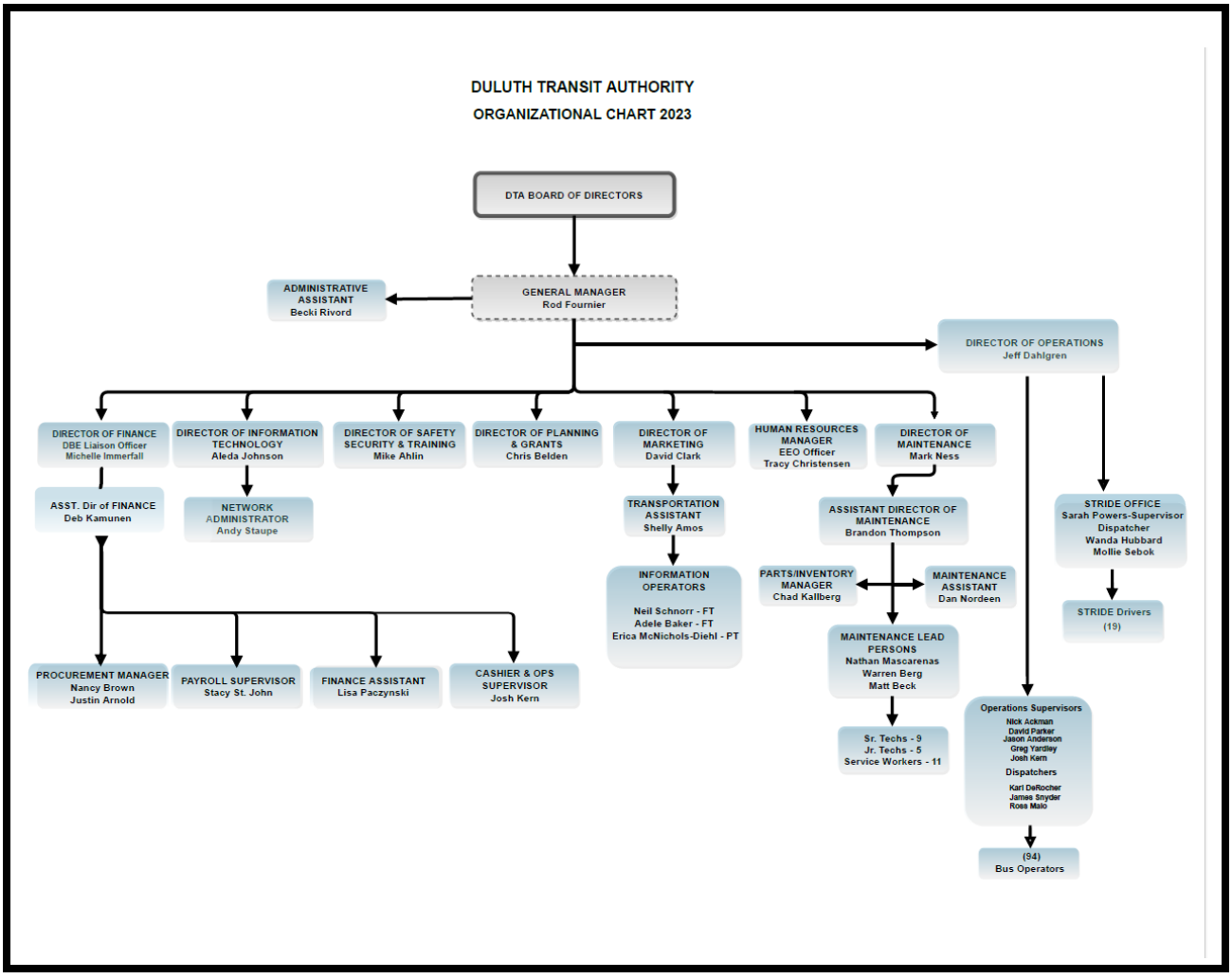
Duluth Transit Authority management will review the PTASP annually, update the document as necessary, and implement the changes within a timeframe that will allow the agency to timely submit to any annual or other periodic reviews, including its annual self-certification of compliance. At minimum, annual self-certification will consist of both the Accountable Executive and Board of Directors signing and dating this document.

An annual review of the PTASP will be conducted by Duluth Transit Authority. Necessary updates outside the annual update window may be handled as PTASP addenda. Reviews of the PTASP and any subsequent updates, addenda, adoption, and distribution activities will be documented in the Activity Log at the beginning of this document.

## 1.3 Organization Structure and System Safety Responsibilities

While the Accountable Executive has the ultimate responsibility for Duluth Transit Authority's implementation of its PTASP, Duluth Transit Authority's executive management has the overall responsibility of safe and secure operations of Duluth Transit Authority and. Each employee is required to carry out specific system safety responsibilities, depending on the employee's position, in compliance with the PTASP.

The information provided in the **Staff Safety Roles and Responsibilities table (Appendix A)** describes each position and general system safety responsibilities, and the agency's reporting structure.



# 2 SAFETY RISK MANAGEMENT

## 2.1 HAZARD IDENTIFICATION

Establishing an effective hazard identification program is fundamental to safety management at Duluth Transit Authority. Hazard identification can be reactive or proactive in nature: safety event reporting, incident investigation, and trend monitoring are essentially reactive; other hazard identification methods proactively seek feedback through data collection, observation, and day-to-day operations analysis. Common hazard identification activities include:

- Employee reporting
- Safety assessments
- Trend monitoring
- Hazard and safety event reporting (with causal factor analysis)
- Safety surveys and audits
- Evaluating customer suggestions and complaints
- MnDOT and FTA data and bulletins

The number of near misses, known as accident precursor data, is significantly greater than the number of accidents for comparable types of events. The practice of reporting and learning from accident precursor data is a valuable complement to other hazard identification practices. To be successful, hazard identification must take place within a non-punitive and just safety culture. Duluth Transit Authority employs systematic safety improvements by discovering and learning of potential weaknesses in the system's safety.

### *2.1.1 Non-Punitive Reporting Policy*

Duluth Transit Authority is committed to the safest transit operating standards practicable. To achieve this, it is imperative that Duluth Transit Authority have uninhibited reporting of all safety events that may compromise safe operations. To this end, every employee is responsible for the communication of any information that may affect the integrity of transit safety. Such communication must be completely free of any form of reprisal.

Duluth Transit Authority will not take disciplinary action against any employee who discloses a safety event. This policy shall not apply to information received by Duluth Transit Authority from a source other than the employee, or that involves an illegal act, or a deliberate or willful disregard of rules, regulations, or agency policies or procedures.

Duluth Transit Authority's method of collection, recording, and disseminating information obtained from transit safety reports has been developed to protect, to the extent permissible by law, the identity of any employee who provides transit safety information.

All employees are encouraged to report any hazards or near-misses they encounter by utilizing the **Employee Safety Reporting Program**. This may involve talking directly to the Director of Safety

and Security, an operations Supervisor, a member of the Safety and Security Team, or completing an Employee Safety Report. The reporter may remain anonymous if they choose to do so.

## 2.2 Safety Risk Assessment

Once a hazard has been identified, Duluth Transit Authority will conduct an assessment to determine the potential consequences. Factors to be considered are the likelihood of occurrence, the severity of the consequences (should there be an occurrence), and the level of exposure to the hazard. Duluth Transit Authority will assess risks subjectively by experienced personnel using a risk assessment matrix. Results of the risk assessment process will help determine whether the risk is being appropriately managed or controlled. If the risks are acceptable, the hazard will continue to be monitored. If the risks are unacceptable, steps will be taken by Duluth Transit Authority to lower the risk to an acceptable or tolerable level, or to remove, avoid, or otherwise eliminate the hazard.

## 2.3 Safety Risk Mitigation

The assessment process may indicate that certain hazards have an acceptable level of risk, while others require mitigation to an acceptable or tolerable level. Duluth Transit Authority will further manage risk by completing a **Hazard Assessment Log (Appendix E)** that can help prioritize safety risks. The level of risk can be lowered by reducing the severity of the potential consequences, likelihood of occurrence, exposure to that risk, or by some combination.

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

1. **Physical Defenses:**
   These include objects and technologies that are engineered to discourage, or warn against, or prevent inappropriate action or mitigate the consequences of events (e.g., traffic control devices, fences, safety restraining systems, transit controls/signals, transit monitoring systems, etc.)
2. **Administrative Defenses:**
   These include procedures and practices that mitigate the likelihood of accident/incident (e.g., safety regulations, standard operating procedures, personnel proficiency, supervision inspection, training, etc.)
3. **Behavioral Defenses:**
   These include behavioral interventions through education and public awareness campaigns aimed at reducing risky and reckless behavior of motorists, passengers and pedestrians, factors outside the control of the agency.

## 2.4 Safety Risk Prioritization

Once a hazard has been identified and the risk level assessed, Duluth Transit Authority will prioritize safety risks using the **Prioritized Safety Risk Log (Appendix F).**
The Prioritized Safety Risk Log will identify:

- The priority level for safety risks
- A description of the risk
- Planned mitigation strategies to address the risk
- The outcome of the planned mitigation strategies

- Responsible staff
- A timeline of the planned mitigation strategies
- The status of the prioritized safety risk

## 2.5 Infectious Disease Prevention and Control

DTA implements strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions, and be consistent with following local, County, State Health Authority, and the Centers for Disease Control (CDC) and Prevention guidelines to minimize exposure to infectious diseases. DTA has also developed internal plans such as a Bloodborne Pathogen training program which is given to all new employees. DTA also employs strategies to mitigate infectious diseases such as bus air purification systems, driver barriers, and masking when recommended.

# 3 SAFETY ASSURANCE

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

Duluth Transit Authority begins the data gathering process with a comprehensive investigation process for all safety events. This process consists of:

- Directly reporting the event to an immediate supervisor or dispatcher.
- Completing a physical accident/incident report and turning it in to a supervisor.
- Review of the report by a dispatcher and/or supervisor for any missing information.
- An operations Supervisor collects and organizes all other related materials such as police/fire reports, photographs, video footage, witness statements, etc.
- The Director of Safety and Security then interviews the involved employee to identify potential causal factors and mitigations.

## 3.1 Defining Safety Goals and Objectives/Outcomes

Setting safety goals and objectives is part of strategic planning and establishing safety policy for Duluth Transit Authority. Clearly defining safety goals is the first part in creating a safety performance measurement system.

**Safety goals** are general descriptions of desirable long-term impacts. For example, a general safety goal might be:

> *"Foster agency-wide support for transit safety by establishing a culture where management is held accountable for safety and everyone in the organization takes an active role in securing transit safety."*

**Safety objectives or outcomes** are more specific statements that define measurable results. For example, a specific safety objective for the goal stated above might be:

> *"Establish regular transit safety meetings comprised of staff at varying levels, including executives, officers, managers, operators and maintenance personnel."*

The safety objective/outcome will then be measured by defining specific performance metrics, including a baseline and target, that Duluth Transit Authority will determine is reasonable.

## 3.2 Defining Safety Performance Measures

Performance measurement is the regular systematic collection, analysis, and reporting of data that track resources used, work produced, and whether specific outcomes were achieved. In other words, it is a tool to quantify and improve performance, and engage and communicate with Duluth Transit Authority staff and external stakeholders.

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

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

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

### *3.2.1 Metrics*

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

- Accident investigation reports (with causal factor analysis)

- Internal safety audits (or reviews)
- Safety committee meetings
- Injury reports (including occupational injury)
- Safety event reports (including accidents, incidents, and occurrences)
- System monitoring (including testing and inspection records)
- Hazard management program

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

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

- **Fatalities**
    1. Total number of reportable fatalities
    2. Rate of reportable fatalities per total vehicle revenue miles
- **Injuries**
    3. Total number of reportable injuries
    4. Rate of reportable injuries per total vehicle revenue miles
- **Safety Events**
    5. Total number of reportable safety events
    6. Rate of reportable safety events per total vehicle revenue miles
- **System Reliability**
    7. Mean distance between major mechanical failures

These safety performance measures are used to select improvement targets for these four measures and for each mode of transit, in order to encourage improvements and monitor the safety performance of delivering transit services. Targets are based on 5- year performance data, and specifically for System Reliability, guided by **DTA Maintenance Policies and Procedures**.

Duluth Transit Authority will make its safety performance measures improvement targets available to applicable state agencies and metropolitan planning organizations (MPOs), and, to the maximum extent practicable, will coordinate with both in the selection of safety performance targets. Targets will be adopted into local Transportation Improvement Plans (TIP) or TIP amendment.

Duluth Transit Authority works with the Metropolitan Interstate Council on establishing performance measures and approving them through our governing bodies. DTA performance measures are included in MIC planning activities including the Long-Range Transportation Plan and the annual Transportation Improvement Program. Targets are discussed between the agencies and approved DTA targets are submitted to the MIC for their planning work.

The safety data collected from the above sources will be analyzed for potential safety impacts. Identified areas of concern are reported to appropriate personnel in the form of specific project reports, memos, and recommendations from the safety committee.

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

## 3.3 Monitoring Performance and Evaluating Results

Once safety goals, objectives/outcomes, and measures have been defined, they can be organized into a **Safety Performance Matrix (Appendix G).** Organizing information, particularly in a matrix, will allow Duluth Transit Authority to continuously monitor safety performance and evaluate results. Duluth Transit Authority will evaluate safety performance and update documentation at least semi-annually.
Compliance with Duluth Transit Authority operations and maintenance procedures will be monitored and determined through the practice of the following:

- Ride-along evaluations
- In-field observations
- Regularly scheduled compliance reviews
- Safety Meeting feedback
- Quality Control Inspections
- Accident/Incident tracking audits
- Peer interviews

Efficacy of policies and procedures will be determined using the same tools listed above, especially Accident/Incident tracking audits and peer interviews. All policies are open to review, especially those that may create another unexpected safety issue.

Reference Appendix A to determine which Duluth Transit Authority personnel are responsible for the tasks listed above. Employees overlap of responsibilities is likely and to be expected, especially in busy times.

The **Hazard Log (Appendix E)** will be reviewed and updated quarterly, ideally one week before the Safety and Security Team meetings. The goal is to have information to report to the committee as well as identifying new potential hazards during the meeting to be added to the log. Results of any mitigations will also be posted in the operator's lounge and maintenance breakroom bulletin boards on a quarterly basis.

## 3.4 Integrating Results into Agency Decision-Making Processes

Duluth Transit Authority is committed to using the data collected and information learned to inform decision-making and instill positive change. The main objective is the continuous improvement of transit system safety. When performance goals are not met, Duluth Transit Authority will work to identify why such goals were not met and what actions can be taken to minimize the gap in achieving defined goals. However, when goals are easily achieved, action will be taken to exceed expectations and re-establish a reasonable baseline.

Uses of performance results include:

- Focus attention on performance gaps and trigger in-depth investigations of what performance problems exist
- Help make informed resource allocation decisions
- Identify needs for staff training or technical assistance
- Help motivate employees to continue making program improvements
- Support strategic planning efforts by providing baseline information for tracking progress
- Identify best practices through benchmarking
- Respond to elected officials and the public's demand for accountability

## 3.5 Sustaining a Safety Management System

In order to sustain the SMS, Duluth Transit Authority will ensure that particular processes are employed to instill an organizational foundation. Examples of actions taken to sustain the SMS include:

- **Create measurement-friendly culture:**
  All staff, including senior managers, should be actively engaged in creating measurement-friendly culture by promoting performance measurement as a means of continuous improvement. Senior managers will also lead by example and utilize performance metrics in decision making processes.
- **Build organization capacity:**
  Investment in developing skilled employee capacity is essential to sustaining an SMS. Both technical and managerial skills will be needed for data collection and analysis and setting goals. Managing staff and the governing board will commit the financial resources required for organizational capacity and maintaining an SMS on a continuous basis.
- **Reliability and transparency of performance results:**
  The SMS will be able to produce and report its results, both good and bad. Performance information should be transparent and made available to all stakeholders. Messengers should be protected to preserve the integrity of the measurement system. The focus should be on opportunities for improvement rather than allocating blame.
- **Demonstrate continuous commitment to measurement:**
  Visible commitment to using metrics is a long-term initiative. Duluth Transit Authority will demonstrate a commitment to performance measurement by establishing a formal process of reporting performance results, such as including transit safety and performance measurement as a standing agenda item at city council and county board meetings.

# 4 SAFETY PROMOTION

## 4.1 Safety Promotion, Culture, and Training

Duluth Transit Authority believes safety promotion is critical to the success of an SMS by ensuring that the entire organization fully understands and trusts its safety policies, procedures, and structure. Further, safety promotion involves establishing an organizational and workplace culture that

recognizes safety as a core value, training employees in safety principles, and allowing open communications of safety issues.

### *4.1.1 Safety Culture*

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

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

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

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

**C. A Reporting Culture**
- Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action
- When safety concerns are reported, they are analyzed, and appropriate action is taken

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

Duluth Transit Authority utilizes many methods of Safety Promotion to continually communicate and reinforce the safety culture in the organization.
These include:
- Comprehensive new employee training program which is heavily safety focused
- Biannual bus operator safety meetings that introduce new and reinforce existing safety concepts
- Quarterly Safety and Security Team (safety committee) meetings
- Semi-monthly maintenance safety meetings
- Weekly Safety Posters displayed on a monitor in the operator lounge
- Daily Safety Thoughts transmitted to each bus on the street

- Participation in the First Transit Be Safe Program, which recognizes safe behavior on the street as it is happening
- Employee of the Month program that is partly based on safe performance of job duties
- An annual Safety Breakfast that recognizes and honors safe performance with food, thanks, awards, and yearly safety pins
- Participation in the Minnesota State Bus Roadeo, which is based on safe driving for the previous year
- Enforcing safety rules for all staff, administrative included, to demonstrate management's full commitment to safety.

### *4.1.2 Training*

During the initial implementation of an SMS, specific training will be required for all employees and contract staff, to explain the agency's safety culture and describe how Duluth Transit Authority's SMS works. The Chief Safety Officer is the resource person for providing a corporate perspective on Duluth Transit Authority's approach to safety management.

All employees of the Duluth Transit Authority are expected to attend initial and ongoing safety trainings specific to their job titles and responsibilities. These include:

**A. New Bus Operator Training - Comprehensive 215-hour training program that consists of:**
   a. **Classroom Instruction** - 55 hours
      i. Entry Level Drivers Training elements
      ii. Defensive driving/Smith System techniques
      iii. Customer service skills
      iv. Emergency situation response
   b. **Behind The Wheel Training** – Instructor and Peer Led - 160 hours
      i. Basic Bus Operation
      ii. Driving range exercises
      iii. Route training

**B. New Maintenance Employee Training – Multi day training program that includes:**
   a. OSHA Training on various job-specific topics
   b. Specialized equipment training
   c. On-the-job training for specific job functions
   d. Bus operation and CDL training

**C. Regular Safety Meetings for Bus Operators, Maintenance, and Administrative Staff**
   a. Bi-Annually for Bus Operators
   b. Bi-Monthly for Maintenance
   c. At least annually for administrative staff

**D. Various safety and management trainings for Operations Supervisors and the Director of Safety and Security from the Transportation Safety Institute and National Transit Institute**

Safety Management training topics may include:

**A. Initial Safety Training for All Staff**
1. Basic principles of safety management including the integrated nature of SMS, risk management, safety culture, etc.
2. Corporate safety philosophy, safety goals and objectives, safety policy, and safety standards

3. Importance of complying with the safety policy and SMS procedures, and the approach to disciplinary actions for different safety issues
4. Organizational structure, roles, and responsibilities of staff in relation to safety
5. Transit agency's safety record, including areas of systemic weakness
6. Requirement for ongoing internal assessment of organization safety performance (e.g., employee surveys, safety audits, and assessments)
7. Reporting accidents, incidents, and perceived hazards
8. Lines of communication for safety managers
9. Feedback and communication methods for the dissemination of safety information
10. Safety promotion and information dissemination

**B. Safety Training for Operations Personnel**

1. Unique hazards facing operational personnel
2. Seasonal safety hazards and procedures (e.g., winter operations)
3. Procedures for hazard reporting
4. Procedures for reporting safety events (accidents and incidents)
5. Emergency procedures

**C. Safety Training for Management**

1. Principles of the SMS
2. Management responsibilities and accountabilities for safety
3. Legal issues (e.g., liability)

**D. Training for the Chief Safety Officer**

1. Familiarization with different transit modes, types of operation, routes, etc.
2. Understanding the role of human performance in safety event causation and prevention
3. Operation of the SMS
4. Investigating safety events
5. Crisis management and emergency response planning
6. Safety promotion
7. Communication skills
8. Performing safety audits and assessments
9. Monitoring safety performance
   National Transit Database (NTD) safety event reporting requirements

# OTHER DOCUMENT REFERENCES

- Employee Safety Reporting Program
- DTA New Bus Operator and New Maintenance Employee Training Programs
- Employee Safety Meeting Records
- Be Safe Program Documents and Records
- DTA Maintenance Policies and Procedures
- DTA Annual Incident Records/Safety Performance Data

# APPENDICES

Appendix A – Staff Safety Roles and Responsibilities
Appendix B – Safety Assessment and System Review

Appendix C – Facility Safety and Security Assessment
Appendix D – Risk Assessment Matrix
Appendix E – Hazard Identification and Risk Assessment Log
Appendix F – Prioritized Safety Risk Log
Appendix G – Safety Performance Matrix

All Duluth Transit Authority PTASP documents and records must be maintained for three (3) years after they are created and be made available upon request by the FTA or other Federal or State Safety Oversight Agencies.