

Agency Safety Plan

City of Huntsville

Department of
Parking & Public Transit



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Director

HUNTSVILLE

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Public Transportation Agency Safety Plan

Version 1

Adopted June 11, 2020

In compliance with 49 CFR Part 673

Developed by the
Alabama Department of Transportation
in conjunction with
The University of Alabama at Huntsville

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1. EXECUTIVE SUMMARY

Moving Ahead for Progress in the 21st Century (MAP-21) granted the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive framework to oversee the safety of public transportation throughout the United States. MAP-21 expanded the regulatory authority of FTA to oversee safety, providing an opportunity for FTA to assist transit agencies in moving towards a more holistic, performance-based approach in Safety Management Systems (SMS). This authority was continued through the Fixing America's Surface Transportation Act (FAST Act).

In compliance with MAP-21 and the FAST Act, FTA promulgated a Public Transportation Safety Program on August 11, 2016 that adopted SMS as the foundation for developing and implementing a Safety Program. FTA is committed to developing, implementing, and consistently improving strategies and processes to ensure that public transportation providers achieve the highest practicable level of safety. SMS helps organizations improve upon their safety performance by supporting the institutionalization of beliefs, practices, and procedures for identifying, mitigating, and monitoring safety risks.

There are several components of the national safety program including the National Public Transportation Safety Plan (NSP) that FTA published to provide guidance on managing safety risks and safety hazards. One component is the Transit Asset Management (TAM) Plan, which was developed and implemented across the industry in 2018. The Public Transportation Agency Safety Plan (PTASP) rule, 49 CFR Part 673, and guidance provided by FTA are the subject of this document.

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. All levels of management, administration and operations are responsible for the safety of their clientele and themselves. To improve public transportation safety to the highest practicable level in the State of Alabama and comply with FTA requirements, the Alabama Department of Transportation (ALDOT) has developed this Agency Safety Plan (ASP) in collaboration with the City of Huntsville (the City) and the City of Huntsville Department of Parking and Public Transit (COH DPPT).

To ensure that the necessary processes are in place to both enhance safety at the local level and contribute to the goals of the NSP, City of Huntsville will adopt this ASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP). While safety has always been a primary function at the City of Huntsville, this document lays out a process to fully implement an SMS over the next several years that complies with the PTASP final rule.

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A. Plan Adoption – 673.11(a)(1)

This Public Transit Agency Safety Plan is hereby adopted, certified as compliant, and signed by:

Tommy Brown, Parking and Public Transit Director

ACCOUNTABLE EXECUTIVE SIGNATURE

DATE

Approval of this plan by the City of Huntsville occurred on June 11, 2020 and is documented in a RESOLUTION from the City Council meeting found in Appendix B.

B. Certification of Compliance – 673.13(a)(b)

ALDOT certifies on [DATE] that this Agency Safety Plan is in full compliance with 49 CFR Part 673 and has been adopted and will be implemented by the City and COH DPPT as evidenced by the plan adoption signature and necessary Council approvals under Section 1.A of this plan.

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2. TRANSIT AGENCY INFORMATION – 673.23(D)

The COH DPPT provides two public transit options for citizens, guests, and individuals in the community. The overall transit service is now locally known as Huntsville Transit. Huntsville Transit consists of fixed route service called “Orbit Huntsville” and paratransit service call “Access Huntsville.” Huntsville Transit launched new routes and services as the result of a comprehensive study of our operations. Improvements are implemented in five phases with the first phase implemented on July 1, 2019. Phases 2-5 will improve route frequency to 30 minutes or less throughout the City’s entire transit network.

Phase 1 focused on changes to the fixed route bus network to reduce trip times and provide more direct routing with fewer transfers. This included extended hours of operation and new Saturday service.

Table 1 contains agency information, while an organizational chart for the COH DPPT is provided in Figure 1.

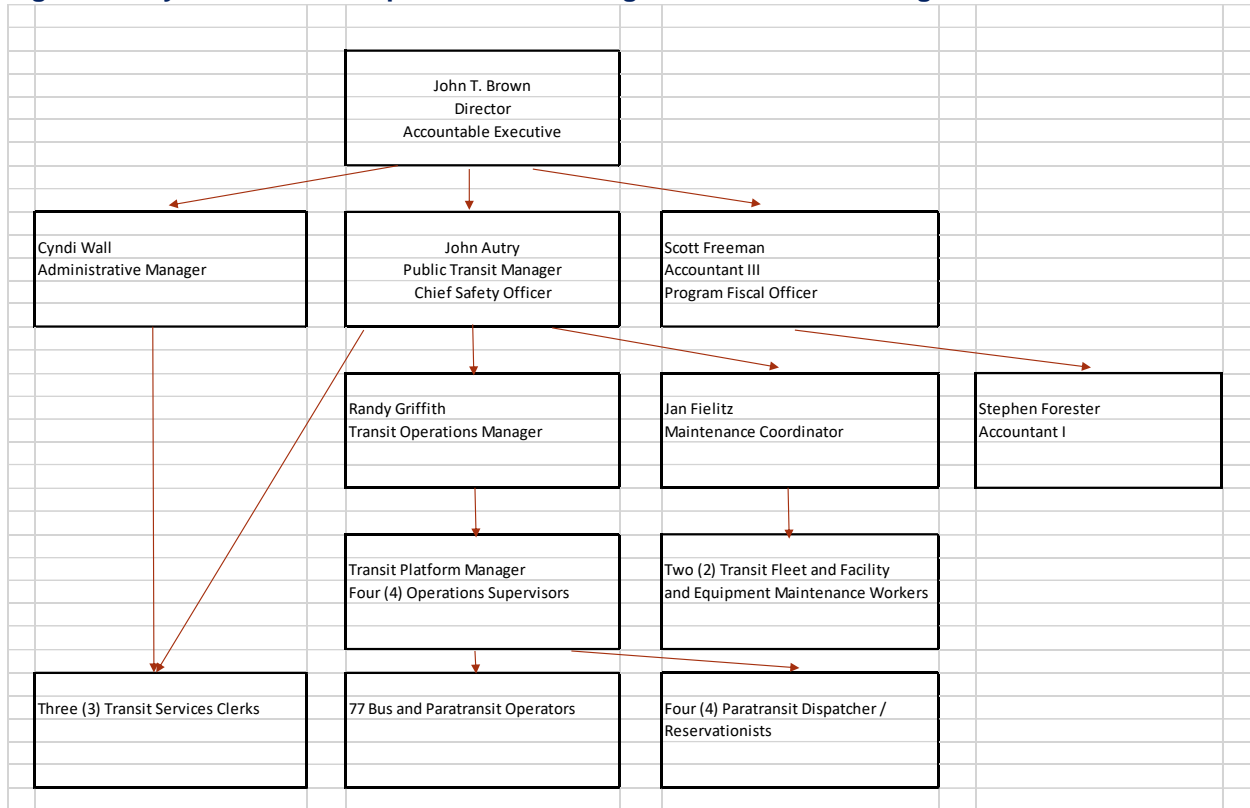
Table 1: Agency Information

Information Type	Information
Full Transit Agency Name	City of Huntsville, Department of Parking and Public Transit
Transit Agency Address	500B Church Street, Huntsville, AL 35801
Name and Title of Accountable Executive 673.23(d)(1)	Tommy Brown, Parking and Public Transit Director
Name of Chief Safety Officer or SMS Executive 673.23(d)(2)	John Autry, Public Transit Manager
Key Staff	Scott Freeman, Accountant III and Program Fiscal Officer
Mode(s) of Service Covered by This Plan 673.11(b)	Huntsville Transit consists of fixed route bus service and paratransit service
List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5310 & 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Huntsville Transit consists of fixed route bus service and paratransit service.
Number of Vehicles Operated	14 fixed route vehicles & 21 Paratransit vehicles

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Figure 1: City of Huntsville Department of Parking and Public Transit Organizational Chart



A. Authorities & Responsibilities – 673.23(d)

As stated in 49 CFR Part 673.23(d), the City and COH DPPT is establishing the necessary authority, accountabilities, and responsibilities for the management of safety amongst the key individuals within the Department of Parking and Public Transit, as those individuals relate to the development and management of our SMS. In general, the following defines the authority and responsibilities associated with our organization.

The **Accountable Executive** has ultimate responsibility for carrying out the SMS of our public transportation agency, and control or direction over the human and capital resources needed to develop and maintain both the ASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan, in accordance with 49 U.S.C. 5326. The Accountable Executive has authority and responsibility to address substandard performance in the COH DPPT SMS per 673.23(d)(1).

Agency leadership and executive management include members of our agency leadership or executive management, other than the Accountable Executive, Chief Safety Officer (CSO), or SMS Executive, who have authority or responsibility for day-to-day implementation and operation of our agency's SMS.

The **CSO** is an adequately trained individual who has the authority and responsibility as designated by the accountable executive for the day-to-day implementation and operation of the COH DPPT's SMS. As such, the CSO is able to report directly to our transit agency's chief Accountable Executive.

Key staff are staff, groups of staff, or committees to support the Accountable Executive, CSO, or SMS Executive in developing, implementing, and operating our agency's SMS.

Front line employees perform the daily tasks and activities where hazards can be readily identified so the hazards can be addressed before the hazards become adverse events. These employees are critical to SMS success through each employee's respective role in reporting safety hazards, which is where an effective SMS and a positive safety culture begins.

In addition, over the next year, the City and COH DPPT will be reviewing and modifying, if necessary, our current job descriptions to ensure the descriptions comply with 49 CFR Part 673.

3. SAFETY POLICIES AND PROCEDURES

A. Policy Statement – 673.23(a)

The City of Huntsville Department of Parking and Public Transit recognizes that the management of safety is a core value of our business. The management team at the COH DPPT will embrace the 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.

The COH DPPT 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 and all employees will receive appropriate information and SMS training.
- 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 (SPT) 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.

I. Employee Safety Reporting Program – 673.23(b)

Frontline employees are a significant source of safety data. These employees are typically the first to spot unsafe conditions that arise from unplanned conditions either on the vehicles, in the maintenance shop, or in the field during operations. For this reason, the Employee Safety Reporting Program (ESRP) is a major tenet of the PTASP Rule. Agencies must establish and implement a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.

COH DPPT will devise and implement an informal safety reporting process whereby employees are encouraged to report safety concerns to direct supervisors and senior management to be addressed at that level. If an employee's concerns are not addressed to the satisfaction of the employee through this informal process, the employee may then use a more formal process described below and set forth in detail in the City's Grievance Policy and Procedure. Retaliation by supervisors and senior management

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against employees who report safety issues will not be allowed. The Grievance Policy and Procedure provides this protection from retaliation in the formal reporting process.

The City has a policy in place called the *Grievance Policy and Procedure* as part of the *Personnel Policies and Procedures Manual* document (Appendix A, Table 8 shows the document name, file name, and date of adoption). This policy is applicable to all types of employee complaints across all City departments, and the procedure requires that employees must raise a complaint to the City of Huntsville Department of Human Resources within thirty days of the incident occurring and a resolution must be sought within fourteen days of receipt of the complaint. For passenger complaints, the City has an online form called the *Public Transportation Feedback Form* that passengers can submit. Over the next year, the City will review and modify, if necessary, our *Grievance Policy and Procedure* to ensure that the procedure complies with 49 CFR Part 673.

In general, the City's *Grievance Policy and Procedure* will ensure that all employees are encouraged to report safety conditions to senior management or their direct supervisor for elevation to senior management. The policy will include any contract employees. The policy will also spell out what protections are afforded employees who report safety related conditions and will describe employee behaviors that are not covered by those protections. The policy will also elaborate on how safety conditions that are reported will be reported back to the originator – either to the individual or groups of individuals or organization depending on the nature of the condition, or if necessary, agency wide.

To bolster the information received from frontline employees, the City will also review our current policy for how COH DPPT receives information and safety related data from employees and customers. If necessary, COH DPPT will develop additional means for receiving, investigating and reporting the results from investigations back to the initiator(s) – either to the person, groups of persons, or distributed agency-wide to ensure that future reporting is encouraged.

II. Communicating the Policy throughout the Agency – 673.23(c)

The City of Huntsville is committed to ensuring the safety of our clientele, personnel and operations. Part of that commitment is developing an SMS and agency-wide safety culture that reduces agency risk to the lowest level possible. The first step in developing a full SMS and agency-wide safety culture is communicating our SMP throughout the agency.

The SMP and safety objectives will be at the forefront of all communications. This communication strategy will include posting the policy in prominent work locations for existing employees and adding the policy statement to the on-boarding material for all new employees. In addition, the policy statement will become part of our regular safety meetings and other safety communications efforts. The policy will be signed by the Accountable Executive so that all employees know that the policy is supported by management.

B. PTASP Development – 673.11(d)

This PTASP has been developed by ALDOT, on behalf of the City and the COH DPPT in accordance with all requirements stated in 49 CFR Part 673 applicable to a small public transportation provider. ALDOT mailed a formal call for participation in a State sponsored PTASP development process to all Alabama Section 5307 small bus transit agencies on January 15, 2019 and followed that call with a series of phone calls and additional correspondence. The City provided a letter to ALDOT opting into participation on March 15, 2019 and has been an active participant in the development of this plan through sharing existing documentation and participating in communication and coordination throughout the development

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of this plan. The City and Department's documentation used in the development of this plan is presented in Table 8, in Appendix A.

In support of tracking performance on our SA and SP processes, the City and the COH DPPT conducts a yearly safety culture survey. The survey is intended to help the COH DPPT assess how well we communicate safety and safety performance information throughout our organization by gauging how safety is perceived and embraced by the COH DPPT's administrators, supervisors, staff and contractors. The survey is designed to help us assess how well we are conveying information on hazards and safety risks relevant to employees' roles and responsibilities and informing employees of safety actions taken in response to reports submitted through our ESRP. Results from our most recent survey were analyzed and incorporated into the implementation strategies contained in this ASP.

Once the documents were reviewed, an on-site interview was conducted with the COH DPPT to gain a better understanding of the agency and agency personnel. This understanding was necessary to ensure that the ASP was developed to fit the CPH DPPT's size, operational characteristics, and capabilities.

The draft ASP was delivered to the COH DPPT in January 2020 for review and comment. Once review was completed and any adjustments were made, the final was delivered to the COH DPPT for review and adoption.

C. PTASP Annual Review – 673.11(a)(5)

As part of the City's ongoing commitment to fully implementing SMS and engaging our employees in developing a robust safety culture, the City will review the ASP and all supporting documentation annually. The review will be conducted as a precursor to certifying to FTA that the ASP is fully compliant with 49 CFR Part 673 and accurately reflects the agency's current implementation status. Certification will be accomplished through the City's annual Certifications and Assurances reporting to FTA.

The annual review will include the ASP and supporting documents (Standard Operating Procedures [SOPs], Policies, Manuals, etc.) that are used to fully implement all the processes utilized to manage safety at the COH DPPT. All changes will be noted (as discussed below) and the Accountable Executive will sign and date the title page of this document and provide documentation of approval by the City, whether by signature or by reference to resolution.

The annual ASP review will follow the update activities and schedule provided below in Table 2. As processes are changed to fully implement SMS or new processes are developed, the COH DPPT will track those changes for use in the annual review.

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Table 2: ASP Annual Update Timeline






Task	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept
Review Agency Operations								
Review SMS Documentation <ul style="list-style-type: none"> • <i>Safety Policy;</i> • <i>Risk Management;</i> • <i>Safety Assurance; and</i> • <i>Safety Promotion.</i> 								
Review Previous Targets and set or Continue Targets								
Report Targets to NTD, ALDOT, Huntsville Area Metropolitan Planning Organization								
Make any necessary adjustments to PTASP								
Update Version No., Adopt & Certify Plan Compliance								★

Table 3 will be used to record final changes made to the ASP during the annual update. This will be a permanent record of the changes to the ASP over time.

Table 3: ASP Record of Changes

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Header	Text	Text	Text	Text
Header	Text	Text	Text	Text
Header	Text	Text	Text	Text

The implementation of SMS is an ongoing and iterative process, and, as such, this PTASP is a working document. A clear record of changes and adjustments is kept for the benefit of safety plan performance management and to comply with Federal statutes.

D. PTASP Maintenance – 673.11(a)(2); (c)

COH DPPT will follow the annual review process outlined above and adjust this ASP as necessary to accurately reflect current implementation status. This plan will document the processes and activities related to SMS implementation as required under 49 CFR Part 673 Subpart C and will make necessary updates to this ASP as the City continues to develop and refine our SMS implementation.

E. PTASP Documentation and Recordkeeping – 673.31

At all times, the City will maintain documents that set forth our ASP, including those related to the implementation of COH DPPT's SMS, and results from SMS processes and activities. The City will also maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that the agency uses to carry out our ASP and all iterations of those documents. These documents will be made available upon request to the FTA, other Federal entity, or ALDOT. The City will maintain these documents for a minimum of three years after they are created. These additional supporting documents are cataloged in Appendix A and the list will be kept current as a part of the annual ASP review and update.

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F. Safety Performance Measures - 673.11(a)(3)

The PTASP Final Rule, 49 CFR Part 673.11(a)(3), requires all public transportation providers that must develop an ASP, to include SPTs based on the safety performance measures established under the NSP. The safety performance measures outlined in the NSP were developed to ensure that the measures can be applied to all modes of public transportation and are based on data currently being submitted to the National Transit Database (NTD). The safety performance measures included in the NSP are fatalities, injuries, safety events, and system reliability (state of good repair as developed and tracked in the TAM Plan).

There are seven (7) SPTs that must be included in each ASP that are based on the four (4) performance measures in the NSP. These SPTs are presented in terms of total numbers reported and rate per Vehicle Revenue Mile (VRM). Each of the seven (7) is required to be reported by mode as presented in Table 4.

Table 4: NSP Safety Performance Measures

Safety Performance Measure	SPT	SPT
Fatalities	Total Number Reported	Rate Per Total VRM
Injuries	Total Number Reported	Rate Per Total VRM
Safety Events	Total Number Reported	Rate Per Total VRM
System Reliability	Mean distance between major mechanical failure	

Table 5 presents baseline numbers for each of the performance measures. COH DPPT collected the past five (5) years of reported data to develop the averages listed in the table.

Table 5: Baseline 2019 Safety Performance Measures

Mode	Fatalities	Rate of Fatalities*	Injuries	Rate of Injuries*	Safety Events	Rate of Safety Events*	Mean Distance Between Major Mechanical Failure
Fixed Route (Bus)	0	0	11	0.0000195	33	0.0000586	28,147
Demand Response	0	0	12	0.0000213	34	0.0000702	80,728

*rate = total number for the year/total revenue vehicle miles traveled

While safety has always been a major component of the COH DPPT operation, the adoption of this ASP will result in a number of changes across all aspects of the organization. The SPTs set in Table 6 and Table 7 reflect an acknowledgment that SMS implementation will produce new information that will be needed to accurately set meaningful SPTs. We set our targets at the current NTD reported five-year average as we begin the process of fully implementing our SMS and developing our targeted safety improvements. This will ensure that we do no worse than our baseline performance over the last five years.

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Table 6: Fixed Route (Bus) Safety Performance Targets

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities*	0	0
Injuries	11	11
Rate of Injuries*	0.0000195	0.0000195
Safety Events	12	12
Rate of Safety Events*	0.0000586	0.0000586
Mean Distance Between Major Mechanical Failure	28,147	28,147

*rate = total number for the year/total revenue vehicle miles traveled

Table 7: Demand Response Safety Performance Targets

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities*	0	0
Injuries	12	12
Rate of Injuries*	0.0000586	0.0000586
Safety Events	34	34
Rate of Safety Events*	0.0000702	0.0000702
Mean Distance Between Major Mechanical Failure	80,728	80,728

*rate = total number for the year/total revenue vehicle miles traveled

As part of the annual review of the ASP, COH DPPT will reevaluate our SPTs and determine if they need to be refined. As more data is collected as part of the SRM process discussed later in this plan, COH DPPT may begin developing safety performance indicators to help inform management on safety related investments.

G. Safety Performance Target Coordination - 673.15(a)(b)

COH DPPT will make our SPTs available to ALDOT and the Huntsville Area Metropolitan Planning Organization (MPO) to aid in their respective regional and long-range planning processes. To the maximum extent practicable, the COH, DPPT will coordinate with ALDOT and the Huntsville Area MPO in the selection of State and MPO SPTs as documented in the Interagency Memorandum of Understanding (MOU) to the maximum extent practicable.

Each year during the FTA Certifications and Assurances reporting process, the City of Huntsville will transmit any updates to our SPTs to both the Huntsville Area MPO and ALDOT (unless those agencies specify another time in writing).

4. SAFETY MANAGEMENT SYSTEMS – 673 SUBPART C

As noted previously, the FTA has adopted SMS as the basis for improving safety across the public transportation industry. In compliance with the National Safety Program, National Public Transportation Safety Plan, and 49 CFR Part 673, COH DPPT is adopting SMS as the basis for directing and managing safety and risk at our agency. The City has always viewed safety as a core business function. All levels of management and employees are accountable for appropriately identifying and effectively managing risk in all activities and operations in order to deliver improvements in safety and reduce risk to the lowest practical level in service delivery.

As noted in the graphic below, SMS is comprised of four basic components – SMP, SRM, SA, and SP. The SMP and SP are the enablers that provide structure and supporting activities that make SRM and SA possible and sustainable. The SRM and SA are the processes and activities for effectively managing safety as presented in Figure 2.

Figure 2: Safety Management Systems



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Implementing SMS at the COH DPPT will be a major undertaking over the next several years. This ASP is the first step to putting in place a systematic approach to managing the agency's risk. COH DPPT has already taken several steps to implement SMS, such as developing this initial ASP and designating a CSO. During the first year of implementation, COH DPPT will identify SMS roles and responsibilities, key stakeholder groups, and key staff to provide support. COH DPPT will also ensure that these key staff receive SMS training, develop a plan for implementing SMS, inform stakeholders about the ASP, and discuss our progress with the Board and planning partners.

A. Safety Risk Management – 673.25

By adopting this ASP, the COH DPPT is establishing the SRM process presented in Figure 3 for identifying hazards and analyzing, assessing and mitigating safety risk in compliance with the requirements of 49 CFR Part 673.25. The SRM processes described in this section are designed to implement the COH DPPT's SMS.

Figure 3: Safety Risk Management Process



The implementation of the SRM component of the SMS will be carried out over the course of the next year, through a program of improvement during which the SRM processes will be implemented, reviewed, evaluated, and revised, as necessary, to ensure the processes are achieving the intended safety objectives as the processes are fully incorporated into the agency's SOPs.

The SRM is focused on implementing and improving actionable strategies that the COH DPPT has undertaken to identify, assess and mitigate risk. The creation of a risk register provides an accessible resource for documenting the SRM process, tracking the identified risks, and documenting the effectiveness of mitigation strategies in meeting defined safety objectives and performance measures. The draft Risk Register is presented in Figure 4.

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Figure 4: Draft Risk Register

Hazard	Type	Likelihood	Consequence	Resolution

What is wrong?

What could happen

What could mitigate this?

As the SRM process progresses through the steps of identifying what may be wrong, what could happen as a result, and what steps the COH DPPT is taking to resolve the risk and mitigate the hazard, the CSO completes and publishes the various components of the Risk Register. These components include the use of safety hazard identification, safety risk assessment, and safety risk mitigation.

I. Safety Hazard Identification – 673.25(b)

COH DPPT's SOPs for maintenance are contained in two documents. For the Handi-Ride demand response service, the SOPs are in the *Handi-Ride Driver's Handbook Section VI Standard Operating Procedure – Maintenance*. For the Huntsville Transit fixed route service, the SOPs are in the *Operations Manual-Huntsville Shuttle, Section VIX System Safety and Emergency Procedures*. Both documents are listed in Appendix A, Table 8.

These SOPs state that the Driver is responsible for inspecting assigned vehicles in line with Pre-Trip Inspection documentation such as the *Daily Vehicle Activity Report*. To ensure compliance with 49 CFR Part 673, the COH DPPT is working to implement the following SRM.

COH DPPT's SRM process is a forward-looking effort to identify safety hazards that could potentially result in negative safety outcomes. In the SRM process, a Hazard is 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.

Hazard identification focuses on out of the norm conditions that need special attention or immediate action, new procedures, or training to resolve a condition that is unacceptable and return conditions to an acceptable level. COH DPPT uses a variety of mechanisms for identifying and documenting hazards, namely:

- Through training and reporting procedures, the COH DPPT ensures personnel are capable of identifying hazards and that each employee clearly understands that they have a responsibility to

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immediately report any safety hazards identified to their supervisors. Continued training helps employees to develop and improve the skills needed to identify hazards.

- Employee hazard training coupled with the ESRP ensures that the COH DPPT has full use of information from frontline employees for hazard identification.
- Upon receiving the hazard report, supervisors report the identified hazard to the CSO for entry into the risk register for risk assessment, classification and possible mitigation.
- Standard reporting forms (e.g. *Daily Vehicle Activity Report*) and other reports completed on a routine basis by administrative, operational and maintenance. COH DPPT's *Standard Operating Procedure – Maintenance* (Section VI of *Handi-Ride Driver's Handbook*) and *System Safety and Emergency Procedures* (Section VIX of the *Operations Manual - Huntsville Shuttle*) contains procedures for flagging and reporting hazards as a part of day-to-day operations.
- Supervisors are responsible for performing and documenting regular safety assessments, which include reporting and recommending methods to reduce identified hazards.
- The COH DPPT uses incident reports and records to determine specific areas of training that need to be covered with employees to ensure safety hazard identification is continually improved, and so that hazards are identified before an event recurrence.
- Incident reports are also analyzed by the risk management team to identify any recurring patterns or themes that would help to identify underlying hazards and root causes of the event that can be mitigated to prevent recurrence.
- If a hazard is such that an employee would be reluctant to report the information due to perceived negative consequences (e.g. disciplinary action), alternative, anonymous reporting mechanisms are available through an anonymous suggestion box or anonymous online reporting form, or other secure mechanism.
- The CSO, risk management personnel and subject matter experts are also encouraged to participate in available professional development activities and peer-to-peer exchanges as a source of expertise and information on lessons learned and best practices in hazard identification.
- Other sources for hazard identification include:
 - ESRP
 - Inspections of personnel job performance, vehicles, facilities and other data
 - Investigations of safety events
 - Safety trend analysis on data currently collected
 - Training and evaluation records
 - Internal safety audits
 - External sources of hazard information could include:
 - FTA and other federal or state authorities
 - Reports from the public
 - Safety bulletins from manufacturers or industry associations

In addition to identifying the hazard, the hazard identification process also classifies the hazard by type (organizational, technical or environmental) to assist the CSO in identifying the optimal combination of

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departmental leadership and subject matter expertise to select in assembling the safety risk assessment team.

The various hazard types can also be categorized by subcategory for each type. For example, organizational hazards can be subcategorized into resourcing, procedural, training or supervisory hazards. Each of the subcategories implies different types of mitigation strategies and potentially affect overall agency resources through varying costs for implementation. Technical hazards can be subcategorized into operational, maintenance, design and equipment. Additionally, environmental hazards can be subcategorized into weather and natural, which is always a factor for every operation.

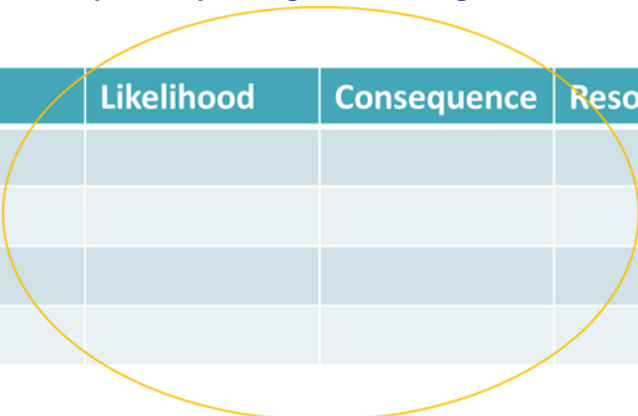
II. Safety Risk Assessment – 673.25(c)

As part of the new SRM process, the COH DPPT has established methods to assess the likelihood and severity of the consequences of identified hazards, and prioritize the hazards based on the safety risk. The process continues the use of the risk register to address the next two components.

To accurately assess a risk, COH DPPT may need to perform an investigation. COH DPPT currently investigates accidents or crashes but will need to develop a full investigation procedure to inform the SRM process. The investigation procedure can start with the *Accident Investigations* procedure in Section 15.3 of the *Personnel Policies and Procedures Manual* (Appendix A, Table 8) and will be developed to cover all risk assessment. Once fully developed the document will become the Investigation SOP. The Investigation SOP will include accident investigation procedures as well as risk investigation procedures. These procedures will be used to investigate risks identified from multiple sources including the ESRP.

Safety risk is based on an assessment of the likelihood of a potential consequence and the potential severity of the consequences in terms of resulting harm or damage. The risk assessment also takes into account any previous mitigation efforts and the effectiveness of those efforts. The results of the assessment are used to populate the third and fourth components of the Risk Register as presented in Figure 5.

Figure 5: Safety Risk Assessment Steps in Populating the Risk Register



Hazard	Type	Likelihood	Consequence	Resolution

The risk assessment is conducted by the CSO and their risk management team through the safety compliance committee supplemented by subject matter experts from the respective department or section to which the risk applies. The process employs a safety risk matrix similar to the one presented in Figure

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6, that allows the safety team to visualize the assessed likelihood and severity to help decision-makers to understand when actions are necessary to reduce or mitigate safety risk.

Figure 6: Safety Risk Assessment Matrix

RISK ASSESSMENT MATRIX				
SEVERITY LIKELIHOOD	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	High	Medium
Probable (B)	High	High	Medium	Medium
Occasional (C)	High	Medium	Medium	Low
Remote (D)	Medium	Medium	Low	Low
Improbable (E)	Medium	Low	Low	Low

Although the current version of the matrix relies heavily on the examples and samples that are listed on the PTASP Technical Assistance Center website, lessons learned from the implementation process during the coming years will be used to customize the matrix that the COH DPPT will use to address our unique operating realities and leadership guidance.

The Risk Assessment Matrix is an important tool. If a risk is assessed and falls within one of the red zones, the risk is determined to be unacceptable under existing circumstances. This determination means that management must take action to mitigate the situation. This is the point in the process when SRMs are developed. If the risk is assessed and falls within one of the yellow zones, the risk is determined to be acceptable, but monitoring is necessary. If the risk falls within one of the green zones, the risk is acceptable under the existing circumstances.

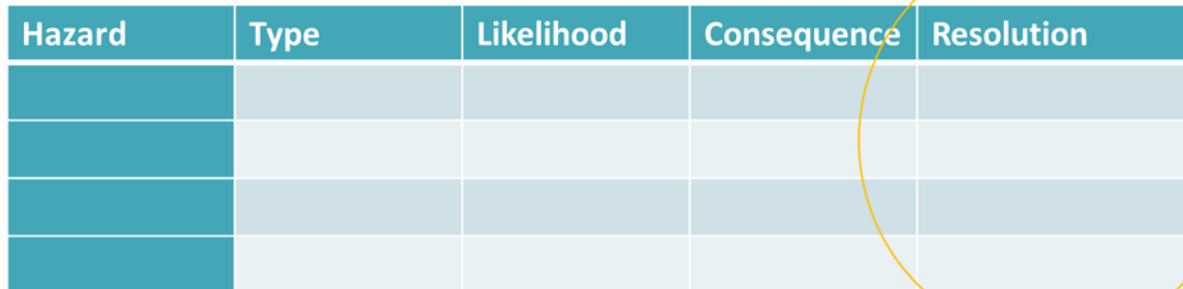
Once a hazard's likelihood and severity have been assessed, the CSO enters the hazard assessment into the risk register that is used to document the individual hazard and the type of risk it represents. This information is used to move to the next step, which is hazard mitigation.

III. Safety Risk Mitigation – 673.25(d)

Upon completion of the risk assessment, the CSO and the Safety Committee continue populating the Risk Register by identifying mitigations or strategies necessary to reduce the likelihood and/or severity of the consequences. In this step, the goal is to avoid or eliminate the hazard or, when elimination is not likely or feasible, reduce the assessed risk rating to an acceptable level (Figure 7). However, mitigations do not typically eliminate the risk entirely.

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Figure 7: Risk Register Mitigation Component



Hazard	Type	Likelihood	Consequence	Resolution

To accomplish this objective the CSO, through the safety compliance committee, works with subject matter experts from the respective department or section to which the risk applies. The risk management team then conducts a brainstorming exercise to elicit feedback from staff and supervisors with the highest level of expertise in the components of the hazard.

Documented risk resolution and hazard mitigation activities from previous risk register entries and their documented level of success at achieving the desired safety objectives may also be reviewed and considered in the process. If the hazard is external (e.g. roadway construction by an outside agency) information and input from external actors or experts may also be sought in order to take advantage of all reasonably available resources and avoid any unintended consequences.

Once a mitigation strategy is selected and adopted, the strategy is assigned to an appropriate staff member or team for implementation. The assigned personnel and their specific responsibilities are entered into the risk register. Among the responsibilities of the mitigation team leader is the documentation of the mitigation effort including whether or not the mitigation was carried out as designed and whether the intended safety objectives were achieved. This information is recorded in the appendix to the risk register for use in subsequent SA activities and to monitor the effectiveness of the SRM program.

B. Safety Assurance – 673.27 (a)

Safety Assurance means processes within COH DPPT SMS that function to ensure a) the implementation and effectiveness of safety risk mitigation, and b) to ensure that the City meets or exceeds our safety objectives through the collection, measurement, analysis and assessment of information.

SA helps to ensure early identification of potential safety issues. SA also ensures that safeguards are in place and are effective in meeting the City's critical safety objectives and contributing to SPTs.

I. Safety Performance Monitoring and Measuring - 673.27 (b)

As the first step in the City's SA program, the COH DPPT collects and monitors data on safety performance indicators through a variety of mechanisms described in the following sections. Safety performance indicators can provide early warning signs about safety risks. COH DPPT currently relies primarily on lagging indicators representing negative safety outcomes that should be avoided or mitigated in the future. But initiatives are underway to adopt a more robust set of leading indicators that monitor

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conditions that are likely to contribute to negative outcomes in the future. In addition to the day-to-day monitoring and investigation procedures detailed below the City will review and document the safety performance monitoring and measuring processes as part of the annual update of this ASP.

Monitoring Compliance and Sufficiency of Procedures – 673.27 (b)(1)

The City monitors our system for personnel compliance with operations and maintenance procedures and monitors these procedures for sufficiency in meeting safety objectives. A list of documents describing the safety related operations and maintenance procedures cited in this ASP is provided in Appendix A of this document.

Supervisors monitor employee compliance with the City's SOPs through direct observation, review of information from internal reporting systems such as the *Grievance Policy and Procedure* from employees and online *Public Transportation Feedback From* submissions from customers.

The City addresses non-compliance with standard procedures for operations and maintenance activities through a variety of actions including revision to training materials and delivery of employee and supervisor training if the non-compliance is systemic. If the non-compliance is situational, then activities may include supplemental individualized training, coaching, and heightened management oversight, among other approaches.

Sometimes personnel are fully complying with the procedures, but the operations and maintenance procedures are inadequate and pose the risk of negative safety outcomes. In this case, the cognizant person submits the deficiency or description of the inadequate procedures to the SRM process. Through the SRM process, the SRM team will then evaluate and analyze the potential organizational hazard and assign the identified hazard for mitigation and resolution, as appropriate. The SRM team will also conduct periodic self-evaluation and mitigation of any identified deficiencies in the SRM process itself.

Monitoring Operations - 673.27(b)(2)

Department heads are required to monitor investigation reports of safety events and SRM resolution reports to monitor operations and to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. If it is determined that the safety risk mitigation did not bring the risk to an acceptable level or otherwise failed to meet safety objectives, then the supervisor resubmits the safety risk/hazard to the SRM process. The CSO will work with the supervisor and subject matter experts to reanalyze the hazard and consequences and identify additional mitigation or alternative approaches to implementing the mitigation.

II. Safety Event Investigation - 673.27(b)(3)

The City currently conducts investigations of safety events as per Section 15.3 of the *Personnel Policies and Procedures Manual* (Appendix A, Table 8). From an SA perspective, the objective of the investigation is to identify causal factors of the event to identify actionable strategies that the City can employ to address any identifiable organizational, technical or environmental hazard at the root cause of the safety event.

The City's current investigation process (based on Section 15.3 of the *Personnel Policies and Procedures Manual* and current operations) meets current local, state and federal procedural guidelines and requirements, but relies heavily on existing available supporting materials (e.g. driver and witness statements, supervisor reports, police reports, camera footage and electronic device recordings and

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records, photographs, analysis reports, etc.). Over the next year, the City will begin to develop additional investigative documentation focused on systemic causal factors in order to better inform the SRM process. Once fully developed, the document will become the Investigation SOP. The SOP will include accident investigation documentation procedures as well as risk/hazard investigation procedures. These procedures will be used to investigate risks/hazards identified from multiple sources including the *Daily Vehicle Activity Report* and Pre-Trip Inspection procedures.

Hazards identified through the investigative process, including previous mitigation in place at the time of the safety event, will be submitted to the SRM process for mitigation and resolution.

Monitoring Internal Safety Reporting Programs - 673.27(b)(4)

As a primary part of the internal safety reporting program, the City monitors information reported through the ESRP. When a report originating through this process documents a safety hazard, the supervisor submits the hazards identified through the internal reporting process, including previous mitigation in place at the time of the safety event, to the SRM process to be analyzed, evaluated, and if appropriate, assigned for mitigation and resolution.

Other Safety Assurance Initiatives

Because leading indicators can be more useful for safety performance monitoring and measurement than lagging indicators, the City is undertaking efforts to implement processes to identify and monitor more leading indicators or conditions that have the potential to become or contribute to negative safety outcomes. This may include trend analysis of environmental conditions through monitoring National Weather Service data; monitoring trends toward or away from meeting the identified SPTs; or other indicators as appropriate.

C. Safety Promotion – 673.29

Management support is essential to developing and implementing SMS. SP includes all aspects of how, why, when and to whom management communicates safety related topics. SP also includes when and how training is provided. The following sections outline both the safety competencies and training that the City will implement and how safety related information will be communicated.

I. Safety Competencies and Training – 673.29(a)

The City provides comprehensive training to all employees regarding each employee's job duties and general responsibilities. This training includes safety responsibilities related to their position. In addition, regular driver safety meetings are held to ensure that safety related information is relayed.

As part of SMS implementation, the COH DPPT will be conducting the following activities:

- Conduct a thorough review of all current general staff categories (administrative, driver, supervisor, mechanic, maintenance, etc.) and their safety related responsibilities.
- Assess the training requirements spelled out in 49 CFR Part 672 and the various courses required for different positions (COH DPPT is not subject to the requirements under 49 CFR Part 672, but will review the training requirements to understand what training is being required of other larger agencies in the event they might be useful).

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- Assess the training material available on the FTA PTASP Technical Assistance Center website.
- Review other training material available from industry sources such as the Community Transportation Association of America and the American Public Transportation Association websites.
- Develop a set of competencies and training required to meet the safety related activities for each general staff category.
- Include expectations for ongoing safety training and safety meeting attendance.
- Develop a training matrix to track progress on individuals and groups within the organization.
- Adjust job notices associated with general staff categories to ensure that new personnel understand the safety related competencies and training needs and the safety related responsibilities of the job.
- Include refresher training in all trainings and apply it to agency personnel and contractors.

II. Safety Communication – 673.29(b)

COH DPPT regularly communicates safety and safety performance information throughout our agency's organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through the ESRP (noted in Section 3.A.I) or other means.

COH DPPT reports any safety related information to the City Council at their regular meetings and will begin including safety performance information. In addition, the COH DPPT holds regularly scheduled meetings with drivers to ensure that any safety related information is passed along that would affect the execution of their duties. COH DPPT also posts safety related and other pertinent information on a bulletin board in the break room for all employees.

COH DPPT will begin systematically collecting, cataloging and where appropriate, analyzing and reporting safety and performance information to all staff. To determine what information should be reported, how and to whom, COH DPPT will answer the following questions:

- What information does this individual need to do their job?
- How can we ensure the individual understands what is communicated?
- How can we ensure the individual understands what action they must take as a result of the information?
- How can we ensure the information is accurate and kept up to date?
- Are there any privacy or security concerns to consider when sharing information? If so, what should we do to address these concerns?

In addition, COH DPPT will review our current communications strategies and determine if others are needed. As part of this effort, COH DPPT has conducted, and will continue to conduct a safety culture survey to understand how safety is perceived in the workplace and what areas COH DPPT should be addressing to fully implement a safety culture at our agency.

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5. APPENDIX A

Table 8: PTASP Supporting Documents

File Name	Revision Date	Document Name	Document Owner
ADA Plan Update January 2018	1/1/2018	Americans with Disabilities Act (ADA) Complimentary Paratransit Plan January 2018 Update	City of Huntsville Department of Parking & Public Transit
Daily mileage list 5.31.19	May 2019	no title	N/A
December 2017 TAM Plan	26-Dec-17	State of Good Repair Performance Targets	City of Huntsville Department of Parking & Public Transit
EEO STATEMENT 2018	4/5/2018	City of Huntsville, Alabama EEO Policy Statement	City of Huntsville
Handi-Ride Driver's Handbook -- November 28, 2017 Update-editable vs	11/1/2017	N/A	City of Huntsville Department of Parking & Public Transit
Hsv. Shuttle Ops. Manual -- November 28, 2017 Update-editable vs	11/28/2017	Operation Manual – Huntsville Shuttle	City of Huntsville Department of Parking & Public Transit
Huntsville Transit Study - FINAL REPORT - REVISED v3	1/1/2019	Huntsville Transit Study	City of Huntsville Department of Parking & Public Transit, Nelson Nygaard
Mechanical System Failure Log FY2019	2019	Active Mechanical System Failure Log	N/A
Personnel Manual Updated March 2019	3/1/2019	City of Huntsville Personnel Policies and Procedures Manual	City of Huntsville
PM SVC Fleet Records May 2019	5/1/2019	N/A	City of Huntsville Department of Parking & Public Transit
Public Transit Division Organizational Chart 01022017	January 2017	Public Transit Division Organizational Chart	City of Huntsville Department of Parking & Public Transit
Public Transit Grant Administration Plan Aug 2018	August 2018	Grant Administration Policies, Procedures, and Processes for Federal Transit Administration Grants	City of Huntsville Department of Parking & Public Transit

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File Name	Revision Date	Document Name	Document Owner
STANDARD OPERATING PROCEDURE -- Video Surveillance System	N/A	STANDARD OPERATING PROCEDURE Video Surveillance Equipment	City of Huntsville Department of Parking & Public Transit
Vehicle Maintenance Plan Updated December 2017 Updated	December 2017	Transit Vehicle Maintenance Plan	City of Huntsville Department of Parking & Public Transit

A. Glossary of Terms

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

Accountable Executive (typically the highest executive in the agency) means a single, identifiable person who has ultimate responsibility for carrying out the SMS of a public transportation agency, 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.

Agency leadership and executive management means those members of agency leadership or executive management, other than an Accountable Executive, CSO, or SMS Executive, who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.

Chief Safety Officer (CSO) 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 CSO may not serve in other operational or maintenance capacities, unless the CSO 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.

Corrective Maintenance means specific, unscheduled maintenance typically performed to identify, isolate, and rectify a condition or fault so that the failed asset or asset component can be restored to a safe operational condition within the tolerances or limits established for in-service operations.

Equivalent Authority means an entity that carries out duties like 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, incident, or occurrence.

Federal Transit Administration (FTA) refers to an operating administration within the United States Department of Transportation.

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

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

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

Key staff means staff means groups of staff, or committees to support the Accountable Executive, Chief Safety Officer, or SMS Executive in developing, implementing, and operating the agency's SMS.

Major Mechanical Failures are failures caused by vehicle malfunctions or subpar vehicle condition which requires that it be pulled from service.

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

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

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

Passenger means a person other than an operator who is on board, boarding, or alighting from a vehicle on a public transportation system for the purpose of travel.

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).

Preventive Maintenance means regular, scheduled, and/or recurring maintenance of assets (equipment and facilities) as required by manufacturer or vendor requirements, typically for the purpose of maintaining assets in satisfactory operating condition. Preventative maintenance is conducted by providing for systematic inspection, detection, and correction of anticipated failures either before they occur or before they develop into major defects. Maintenance, including tests, measurements, adjustments, and parts replacement, performed specifically to prevent faults from occurring. The primary goal of maintenance is to avoid or mitigate the consequences of failure of equipment.

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

Rail Fixed Guideway Public Transportation System means any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration, or any such system in engineering or construction. Rail fixed guideway public transportation systems include but are not limited to rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway.

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Rail Transit Agency means any entity that provides services on a rail fixed guideway public transportation system.

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.

Road Calls means specific, unscheduled maintenance requiring either the emergency repair or service of a piece of equipment in the field or the towing of the unit to the garage or shop

Safety Assurance (SA) means the process 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 (SMP) 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 regarding safety.

Safety Management System (SMS) means the formal, top-down, data-driven, 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 (SMS) Executive means a CSO or an equivalent.

Safety Objective means a general goal or desired outcome related to safety.

Safety Performance means an organization's safety effectiveness and efficiency, as defined by safety performance indicators and targets, measured against the organization's safety objectives.

Safety Performance Indicator refers to a data-driven, quantifiable parameter used for monitoring and assessing safety performance.

Safety Performance Measure is 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.

Safety Performance Monitoring means activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.

Safety Performance Target (SPT) means a quantifiable level of performance or condition, expressed as a value for a given performance measure, achieved over a specified timeframe related to safety management activities.

Safety Promotion (SP) 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 means the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome.

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.

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Safety Risk Management (SRM) means a process within a Rail Transit Agency's Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risk.

Safety risk mitigation means the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards.

Safety Risk Probability means the likelihood that a consequence might occur, taking as reference the worst foreseeable—but credible—condition.

Safety Risk Severity means the anticipated effects of a consequence, should it materialize, taking as reference the worst foreseeable—but credible—condition.

Serious Injury means any injury which:

- Requires hospitalization for more than 48 hours, commencing within seven days from the date of the injury was received;
- Results in a fracture of any bone (except simple fractures of fingers, toes, or nose);
- Causes severe hemorrhages, nerve, muscle, or tendon damage;
- Involves any internal organ; or
- 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 can operate at a full level of performance.

State Safety Oversight Agency means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.

Transit Agency means an operator of a public transportation system.

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

Vehicle Revenue Miles (VRM) Means the miles that vehicles are scheduled to or traveled while in revenue service. Vehicle revenue miles include layover / recovery time and exclude deadhead; operator training; vehicle maintenance testing; and school bus and charter services.

B. Additional Acronyms Used

ALDOT: Alabama Department of Transportation

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ASP: Agency Safety Plan

City: City of Huntsville

COH DPPT: City of Huntsville Department of Parking and Public Transit

ESRP: Employee Safety Reporting Program

FAST Act: Fixing America's Surface Transportation Act

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

MOU: Memorandum of Understanding

MPO: Metropolitan Planning Organization

NSP: National Safety Plan

NTD: National Transit Database

PA: Project Administrator

SOP: Standard Operating Procedure

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6. APPENDIX B

A. City Council Minutes or Resolution