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**MetroWest Regional Transit Authority  
(MWRTA)**

**Safety Plan**

**Revised November 2023**

## Transit Agency Information

|  |   |  |   |
|--|---|--|---|
| <b>Transit Agency Name</b>   | MetroWest Regional Transit Authority (MWRTA)  |  |   |
| <b>Transit Agency Address</b>  | 15 Blandin Ave, Framingham MA 01702   |  |   |
| <b>Name and Title of Accountable Executive</b>   | Jim Nee, Administrator  |  |   |
| <b>Name of Chief Safety Officer or SMS Executive</b>   | Eva Willens, Deputy Administrator   |  |   |
| <b>Mode(s) of Service Covered by This Plan</b>   | Motor Bus (MB) aka Fixed Route, Demand Response (DR)  | <b>List All FTA Funding Types (e.g., 5307, 5337, 5339)</b> | 5307, 5310, 5339  |
| <b>Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)</b> | MWRTA contracts with Kiessling Transit, Inc./National Express Transit Corporation, a private transit service provider, to provide MB and DR Services. |  |   |
| <b>Does the agency provide transit services on behalf of another transit agency or entity?</b>     | Yes<br><input type="checkbox"/>   | No<br><input checked="" type="checkbox"/>                  | <b>Description of Arrangement(s)</b><br>Not Applicable. |
| <b>Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided</b>        | Not Applicable.   |  |   |

## Plan Development, Approval, and Updates

|   |   |                              |
|---|---|------------------------------|
| <b>Name of Entity That Drafted This Plan</b>  | MetroWest Regional Transit Authority (MWRTA)              |                              |
| <b>Signature by the Accountable Executive</b>   | <b>Signature of Accountable Executive</b>                 | <b>Date of Signature</b>     |
|   | Jim Nee/MWRTA Administrator                               |                              |
| <b>Approval by the Board of Directors or an Equivalent Authority</b>                    | <b>Name of Individual/Entity That Approved This Plan</b>  | <b>Date of Approval</b>      |
|   | Joe Nolan/MWRTA Advisory Board Chair                      |                              |
|   | <b>Relevant Documentation (Title and Location)</b>        |                              |
| MWRTA Advisory Board Meeting Minutes of XXXX<br>15 Blandin Avenue, Framingham, MA 01702 |   |                              |
| <b>Certification of Compliance</b>  | <b>Name of Individual/Entity That Certified This Plan</b> | <b>Date of Certification</b> |

|  |  |                                |
|--|--|--------------------------------|
|  | <i>FTA Transit Award Management System (TrAMS)</i> | <i>On or before 12/31/2023</i> |
| <b>Relevant Documentation (Title and Location)</b> |  |                                |
| <i>Certifications and Assurances / FTA TrAMS</i>   |  |                                |

| <b>Version Number and Updates</b>                                       |   |   |                    |
|---|---|---|--------------------|
| <i>Record the complete history of successive versions of this plan.</i> |   |   |                    |
| <b>Version Number</b>   | <b>Section/Pages Affected</b>             | <b>Reason for Change</b>  | <b>Date Issued</b> |
| 00  |   | Initial Release   | 08/26/2020         |
| 01  | Reformatted Safety Plan                   | FTA PTASP Rule  | 09/01/2020         |
| 02  | Benchmark Targets                         | Adjusted Targets Based on Previous Performance                            | 09/19/2021         |
| 03  | Change Accountable Exec Benchmark Targets | New MWRTA Administrator<br>Adjusted Targets Based on Previous Performance | 11/8/2022          |
| 04  | Benchmark Targets                         | Adjusted Targets  | 11/29/2023         |

| <b>Annual Review and Update of the Agency Safety Plan</b>  |
|--|
| <i>Describe the process and timeline for conducting an annual review and update of the ASP.</i>  |
| MWRTA will review and approve the Agency Safety Plan (ASP) annually within the first quarter, July 1 <sup>st</sup> – September 30 <sup>th</sup> , of the fiscal year. MWRTA will adopt any changes to FTA regulations as part of this regular review as well as modify the plan to reflect any major changes in processes or procedures to its safety plan. In addition to the annual review, MWRTA will refresh the plan if the approach documented in this plan is found to be ineffective, resources available to the SMS are changed or re-prioritized and/or significant changes are made to the organization structure. The MWRTA Safety Plan addresses all applicable requirements and standards as set forth in FTA’s Public Transportation Safety Program and the National Public Transportation Safety Plan. |

### Safety Performance Targets

| <b>Safety Performance Targets</b>   |                           |                          |                         |                        |                              |                             |                           |
|---|---------------------------|--------------------------|-------------------------|------------------------|------------------------------|-----------------------------|---------------------------|
| <i>Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.</i> |                           |                          |                         |                        |                              |                             |                           |
| <b>Mode of Transit Service</b>  | <b>Fatalities (Total)</b> | <b>Fatalities (Rate)</b> | <b>Injuries (Total)</b> | <b>Injuries (Rate)</b> | <b>Safety Events (Total)</b> | <b>Safety Events (Rate)</b> | <b>System Reliability</b> |
| MB  | 0                         | 0/100,000                | <10                     | .8/100,000             | <10                          | .8/100,000                  | 75,000 mi                 |
| DR  | 0                         | 0/100,000                | <8                      | 1/100,000              | <8                           | 1/100,000                   | 75,000 mi                 |

| <b>Safety Performance Target Coordination</b>  |  |                                 |
|--|--|---------------------------------|
| <i>Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.</i>  |  |                                 |
| <p>MWRTA's Accountable Executive will share our ASP, including safety performance targets with the Boston Area MPO and MassDOT in our service area each year after its formal adoption. MWRTA personnel are available and will make reasonable effort to coordinate with MassDOT and the Boston MPO in the selection of MassDOT and Boston MPO safety performance targets. MWRTA has established the safety targets above by reviewing historic safety data of its fleet, with the goal of operating as safely as possible, proactively addressing hazards as they are identified.</p> |  |                                 |
| <b>Targets Transmitted to the State</b>  | <b>State Entity Name</b>                       | <b>Date Targets Transmitted</b> |
|  | Massachusetts Department of Transportation     | XXX                             |
| <b>Targets Transmitted to the Metropolitan Planning Organization(s)</b>  | <b>Metropolitan Planning Organization Name</b> | <b>Date Targets Transmitted</b> |
|  | Boston MPO                                     | XXX                             |
|  |  |                                 |

# 1. Safety Management Policy

| <b>Safety Management Policy Statement</b>  |
|--|
| <i>Use the written statement of safety management policy, including safety objectives.</i>   |
| <p>Safety is a core value at the MWRTA, and managing safety is a core business function. We will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the general public. MWRTA is committed to the following safety objectives:</p> <ul style="list-style-type: none"> <li>• Communicating the purpose and benefits of the Safety Management System (SMS) to all managers, supervisors, and employees.</li> <li>• Providing a culture of open reporting of all safety concerns, ensuring that no action will be taken against any employee who discloses a safety concern through MWRTA's Employee Safety Reporting Program (ESRP), unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.</li> <li>• Providing appropriate management involvement and the necessary resources to establish an effective ESRP that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.</li> <li>• Identifying hazardous and unsafe work conditions and analyzing data from the ESRP. (After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.)</li> <li>• 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.</li> <li>• Working with our contracted transit providers to ensure that they are aware of agency safety goals and can report safety concerns in the same open manner.</li> <li>• Reviewing contractor provided safety programs and trainings to ensure alignment with the agency's safety goals published under this document.</li> </ul> |

|   |  |
|---|--|
| <p><b>Safety Management Policy Communication</b></p> <p><i>Describe how the safety management policy is communicated throughout the agency. Include dates where applicable.</i></p>   |  |
| <p>MWRTA will transmit the accepted ASP to all employees, managers, executives, contractors, and the Advisory Board via electronic mail. This safety plan will be introduced to all key stakeholders through informational meetings and will post the Safety Management Policy Statement along with information regarding the Employee Safety Reporting Program on employee communication boards located throughout the Blandin Hub. The SMS executive identified in this plan will be responsible for this distribution. MWRTA will incorporate the accepted program into new-hire training and refresher training materials. Contractors have been encouraged to report safety issues through both formal procedures and have also been provided an anonymous suggestion box to ensure that they can report issues without retaliation.</p> |  |
| <p><b>Authorities, Accountabilities, and Responsibilities</b></p> <p><i>Describe the role of the following individuals for the development and management of the transit agency's Safety Management System (SMS).</i></p>   |  |
| <p><b>Accountable Executive</b></p>   | <p>The Administrator serves as MWRTA's Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> <li>• Controls and directs human and capital resources needed to develop and maintain the ASP and SMS.</li> <li>• Designates an adequately trained Chief Safety Officer who is a direct report.</li> <li>• Chairs the MWRTA operations meetings (which is comprised of the Safety Committee).</li> <li>• Ensures that MWRTA's SMS is effectively implemented.</li> <li>• Ensures action is taken to address substandard performance in MWRTA's SMS.</li> <li>• Assumes ultimate responsibility for carrying out MWRTA's ASP and SMS.</li> <li>• Maintains responsibility for carrying out the agency's Transit Asset Management (TAM) Plan.</li> </ul>   |
| <p><b>Chief Safety Officer or SMS Executive</b></p>   | <p>The Accountable Executive designates the Deputy Administrator as MWRTA's Chief Safety Officer. The Chief Safety Officer has the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> <li>• Develops MWRTA's ASP and SMS policies and procedures.</li> <li>• Ensures and oversees day-to-day implementation and operation of MWRTA's SMS.</li> <li>• Manages MWRTA's ESRP.</li> <li>• Co-chairs the MWRTA operations meetings and <ul style="list-style-type: none"> <li>- Coordinates the activities of the members;</li> <li>- Establishes and maintains MWRTA's Safety Risk Register and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents, and accidents; and</li> <li>- Maintains minutes of operations meetings.</li> </ul> </li> <li>• Advises the Accountable Executive on SMS progress and status.</li> <li>• Identifies substandard performance in MWRTA's SMS and develops action plans for approval by the Accountable Executive.</li> <li>• Ensures MWRTA policies are consistent with MWRTA's safety objectives.</li> </ul> <p>Provides Safety Risk Management (SRM) expertise and support for other MWRTA personnel who conduct and oversee Safety Assurance activities.</p> |
| <p><b>Agency Leadership and Executive Management</b></p>  | <p>Agency Leadership and Executive Management also have authorities and responsibilities for day-to-day SMS implementation and operation of MWRTA's SMS under this plan. MWRTA Agency Leadership and Executive Management include:</p> <ul style="list-style-type: none"> <li>• Deputy Administrator</li> <li>• Facilities Director</li> <li>• Fleet Director</li> <li>• Director of Fixed Route aka Motor Bus (MB), Intermodal, and Marketing</li> </ul>  |

|  |  |
|--|--|
|  | <ul style="list-style-type: none"> <li>• Director of Human Resources and Training</li> <li>• Operations Managers and Supervisors</li> <li>• Contractor General Manager and Chief Dispatcher</li> </ul> <p>MWRTA Leadership and Executive Management personnel have the following authorities, accountabilities, and responsibilities:</p> <ul style="list-style-type: none"> <li>• Participate as members of MWRTA's operations meetings.</li> <li>• Complete training on SMS and MWRTA's ASP elements.</li> <li>• Oversee day-to-day operations of the SMS in their departments.</li> <li>• Modify policies in their departments consistent with implementation other SMS, as necessary.</li> <li>• Provide subject matter expertise to support implementation of the SMS as requested by the Accountable Executive or the Chief Safety Officer, including SRM activities, investigation of safety events, development of safety risk mitigations, and monitoring of mitigation effectiveness.</li> </ul> |
|--|--|

|                         |  |
|-------------------------|--|
| <p><b>Key Staff</b></p> | <p>MWRTA uses weekly operations meetings to discuss and support its SMS and safety programs. Supervising staff are required to discuss any hazards identified by their employees either directly or anonymously at these meetings. MWRTA SMS Executive is a part of the MWRTA Senior Staff operations meeting, contractor of the Fixed Route (aka MB) operations meeting, and the contractor the Demand Response operations meeting where all safety responsible executive management are able to discuss and review concerns. The SMS executive also has an open door policy to discuss any hazards or safety concerns on a one to one basis. Hazard self-reporting will be further encouraged at these meetings. Information discussed in these meetings will be documented.</p> <p>The Contractor's Safety Manager regularly inspects the MWRTA facility and operator's proper use of equipment. Security concerns regarding the facility are discussed immediately with MWRTA staff. Improper or unsafe operation of equipment results in operator retraining and discussion at the next appropriate operations meeting.</p> |
|-------------------------|--|

**Employee Safety Reporting Program**

*Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded from protection).*

MWRTA's ESRP encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. There are many ways employees can report safety conditions:

- Contractor may report conditions directly to the dispatcher, who will add them to the daily Operations Log.
- Contractor staff are strongly encouraged and trained to report conditions to their Safety Manager, who will then discuss during the weekly operations meeting between the contractor and MWRTA Administration.
- Report conditions anonymously via a locked comment box in both the driver area and administration area.
- Report conditions directly to any supervisor, manager, or director.

Reports received are discussed in detail during the weekly meetings and recorded in the log at that time.

Examples of information typically reported include:

- Safety concerns in the operating environment (for example, city or town road conditions or the condition of facilities or vehicles);
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection);
- Events that management might not otherwise know about (for example, near misses); and
- Information about why a safety event occurred (for example, radio communication challenges).

On a daily basis, the Chief Safety Officer reviews the dispatch daily Operations Log, checks the comment box, and documents identified safety conditions in the Safety Risk Register. MWRTA's Chief Safety Officer, supported by other MWRTA Administration Staff, as necessary, will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and resolved through MWRTA's SRM process and that reported deficiencies and non-compliance with rules or procedures are managed through MWRTA's Safety Assurance process.

MWRTA's Chief Safety Officer discusses actions taken to address reported safety conditions during the weekly MWRTA operations meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the Chief Safety Officer or designee follows up directly with the employee when MWRTA determines whether or not to take action and after any mitigation is implemented.

MWRTA encourages participation in the ESRP by protecting employees that report safety conditions in good faith (see MWRTA Employee Handbook, Standards and Expectations for Workforce Safety Section on pages 8 & 9, for more information). However, MWRTA may take disciplinary action if the report involves any of the following:

- Willful participation in illegal activity, such as assault or theft;
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended, such that people or property are put at risk; or
- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances.

Vehicle-related safety defects must be reported by the driver on the pre-trip DVIR report and will be reviewed by the MWRTA Fleet Director or Maintenance staff prior to allowing the vehicle to operate in revenue service. Defects discovered after this pre-trip DVIR must be reported immediately to dispatch who will discuss the appropriate course of action to take with maintenance. Maintenance staff will also inspect vehicles during preventive maintenance and address any safety concerns discovered.

The MWRTA facilities are inspected daily and safety defects and identified hazards are logged and will be addressed at the respective weekly meetings if not able to be addressed immediately.



## 2. Safety Risk Management

### Safety Risk Management Process

*Describe the Safety Risk Management process, including:*

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards.*
- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards.*
- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment.*

MWRTA uses the SRM process as a primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. It is a process whereby hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to MWRTA's leadership. MWRTA's SRM process allows us to carefully examine what could cause harm and determine whether we have taken sufficient precautions to minimize the harm, or if further mitigations are necessary.

MWRTA's Chief Safety Officer leads MWRTA's SRM process, working with MWRTA's operations to identify hazards and consequences, assess safety risk of potential consequences, and mitigate safety risk. The results of MWRTA's SRM process are documented in our Safety Risk Register and referenced materials.

MWRTA's SRM process applies to all elements of our system including our operations and maintenance; facilities and vehicles; and personnel recruitment, training, and supervision.

In carrying out the SRM process, MWRTA uses the following terms:

- Event – Any accident, incident, or occurrence.
- Hazard – Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure belonging to MWRTA; or damage to the environment.
- Risk – Composite of predicted severity and likelihood of the potential effect of a hazard.
- Risk Mitigation – Method(s) to eliminate or reduce the effects of hazards.
- Consequence – An effect of a hazard involving injury, illness, death, or damage to MWRTA property or the environment.

#### Safety Hazard Identification

The safety hazard identification process offers MWRTA the ability to identify hazards and potential consequences in the operation and maintenance of our system. Hazards can be identified through a variety of sources, including:

- ESRP;
- Review of vehicle camera footage;
- Review of monthly performance data and safety performance targets;
- Observations from supervisors;
- Maintenance reports;
- Comments from customers, passengers, and third parties, including MWRTA's insurance vendor and auditors;
- Operations Staff, Drivers, and MWRTA meetings;
- Results of audits and inspections of vehicles and facilities;
- Results of training assessments;
- Investigations into safety events, incidents, and occurrences; and
- Federal Transit Administration (FTA) and other oversight authorities (mandatory information source).

When a safety concern is observed by MWRTA's management or supervisory personnel, whatever the source, it is reported to MWRTA's Chief Safety Officer. Procedures for reporting hazards to MWRTA's Chief Safety Officer are reviewed during MWRTA meetings and in the operations meetings. MWRTA's Chief Safety Officer also receives employee reports from the ESRP, customer comments related to safety, and the dispatch daily Operations Log.

MWRTA's Chief Safety Officer reviews these sources for hazards and documents them in MWRTA's Safety Risk Register.

MWRTA's Chief Safety Officer also may enter hazards into the Safety Risk Register based on the review of MWRTA's operations and maintenance, the results of audits and observations, and information received from FTA and other oversight authorities, as well as the National Transportation Safety Board.

MWRTA's Chief Safety Officer may conduct further analyses of hazards and consequences entered into the Safety Risk Register, to collect information and identify additional consequences, and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, MWRTA's Chief Safety Officer may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard;
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary;
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard;
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.);
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard;
- Review any past reported hazards of a similar nature; and
- Evaluate tasks and/or processes associated with the reported hazard.

MWRTA's Chief Safety Officer will then prepare an agenda to discuss identified hazards and consequences with the staff during weekly operations meetings. This agenda may include additional background on the hazards and consequences, such as the results of trend analyses, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities.

Any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately be brought to the attention of the Accountable Executive and addressed through the SRM (with or without the full operations staff) for safety risk assessment and mitigation. This means that the Chief Safety Officer believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of Environmental Protection Agency or MWRTA environmental protection standards. Otherwise, the operations staff will prioritize hazards for further SRM activity.

**Infectious Disease Mitigations:** MWRTA will review closely guidance from the Center of Disease Control (CDC) and FTA regarding mitigation strategies to assist with reducing the possibility of and preventing the spread of infectious disease. Any policy changes regarding the use of masks or other mitigation strategies will be conveyed to contractors and customers as information becomes available.

**Safety Risk Assessment:** MWRTA assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk.

MWRTA has adopted the PTASP sample Risk Assessment Matrix:

| RISK ASSESSMENT MATRIX |                     |                 |                 |                   |
|------------------------|---------------------|-----------------|-----------------|-------------------|
| SEVERITY<br>LIKELIHOOD | Catastrophic<br>(1) | Critical<br>(2) | Marginal<br>(3) | Negligible<br>(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               |

This matrix allows the MWRTA to assign a High, Medium or Low categorization for hazards based on the severity and likelihood of the identified hazard.

The following definitions are used to identify the Severity of the event:

| Severity Categories |                   |   |
|---------------------|-------------------|---|
| Description         | Severity Category | Criteria  |
| Catastrophic        | 1                 | Could result in one or more of the following: multiple deaths, permanent total disability, irreversible significant environmental impact or monetary loss equal to or exceeding \$10M.  |
| Critical            | 2                 | Could result in one or more of the following: death, permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M. |
| Marginal            | 3                 | Could result in one or more of the following: injury or occupational illness resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100K but less than \$1M.  |
| Negligible          | 4                 | Could result in one or more of the following: injury or occupational illness not resulting in a lost workday, minimal environmental impact, or monetary loss less than \$100K.  |

*Adopted from FTA PTASP Standard Matrix*

The following definitions are used to identify the Likelihood of the event:

| Likelihood Levels |       |   |   |
|-------------------|-------|---|---|
| Description       | Level | Individual item   | System or Vehicle Fleet   |
| Frequent          | A     | Likely to occur often in the life of an item.   | Continuously experienced. Potential consequence may be experienced more than once in 500 operating hours.                                   |
| Probable          | B     | Will occur several times in the life of an item.  | Will occur frequently. Potential consequence may be experienced once between 500 and 6,000 operating hours.                                 |
| Occasional        | C     | Likely to occur sometime in the life of an item.  | Will occur several times. Potential consequence may be experienced once between 6,000 and 60,000 operating hours.                           |
| Remote            | D     | Unlikely, but possible to occur in the life of an item.                                   | Unlikely but can reasonably be expected to occur. Potential consequence may be experienced once between 60,000 and 180,000 operating hours. |
| Improbable        | E     | So unlikely, it can be assumed occurrences may not be experienced in the life of an item. | Unlikely to occur, but possible.  |

*Adopted from FTA PTASP Standard Matrix*

Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk.

The Chief Safety Officer schedules safety risk assessment activities on the weekly operations meeting agenda and prepares a Safety Risk Assessment Package. This package is distributed at least one week in advance of the operations meeting. During the meeting, the Chief Safety Officer reviews the hazard and its consequence(s) and reviews available information distributed in the Safety Risk Assessment Package on severity and likelihood. The Chief Safety Officer may request support from members of the operations staff in obtaining additional information to support the safety risk assessment.

Once sufficient information has been obtained, the Chief Safety Officer will facilitate completion of relevant sections of the Safety Risk Register, using the MWRTA Safety Risk Assessment Matrix, with the operations staff. The Chief Safety Officer will document the operation meeting's safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Safety Risk Register. The Chief Safety Officer will maintain on file operations meeting agendas, Safety Risk Assessment Packages, additional information collection, and completed Safety Risk Register sections for a period of three years from the date of generation.

## Safety Risk Mitigation

MWRTA's Accountable Executive and Chief Safety Officer review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards based on recommendations from the operations meeting. MWRTA can reduce safety risk by reducing the likelihood and/or severity of potential consequences of hazards.

Prioritization of safety risk mitigations is based on the results of safety risk assessments. MWRTA's Chief Safety Officer tracks and updates safety risk mitigation information in the Safety Risk Register and makes the Register available to the operations staff during bimonthly meetings and available upon request.

In the Safety Risk Register, MWRTA's Chief Safety Officer will also document any specific measures or activities, such as reviews, observations, or audits, that will be conducted to monitor the effectiveness of mitigations once implemented.

### 3. Safety Assurance

#### **Safety Performance Monitoring and Measurement**

*Describe activities to monitor the system for compliance with procedures for operations and maintenance.*

MWRTA has many processes in place to monitor its entire transit system for compliance with operations and maintenance procedures, including:

- Safety audits,
- Informal inspections,
- Regular review of onboard camera footage to assess drivers and specific incidents,
- Safety surveys,
- ESRP,
- Investigation of safety occurrences,
- Safety review prior to the launch or modification of any facet of service,
- Daily data gathering and monitoring of data related to the delivery of service, and
- Regular vehicle inspections and preventative maintenance.

Results from the above processes are compared against recent performance trends quarterly and annually by the Chief Safety Officer to determine where action needs to be taken. The Chief Safety Officer enters any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for reevaluation by the operations meeting.

*Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.*

MWRTA monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The Chief Safety Officer maintains a list of safety risk mitigations in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

The Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate director, manager, or supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports; conducting job performance observations; or other activities. The Chief Safety Officer will endeavor to make use of existing MWRTA processes and activities before assigning new information collection activities.

MWRTA's Chief Safety Officer review the performance of individual safety risk mitigations during weekly operations meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the operations staff will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify this proposed course of action and oversee its execution.

MWRTA's Chief Safety Officer also monitors MWRTA's operations on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by:

- Reviewing results from accident, incident, and occurrence investigations;
- Monitoring employee safety reporting;
- Reviewing results of internal safety audits and inspections; and
- Analyzing operational and safety data to identify emerging safety concerns.

The Chief Safety Officer works with the Accountable Executive to carry out and document all monitoring activities.

*Describe activities to conduct investigations of safety events, including the identification of causal factors.*

MWRTA maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event. These procedures also reflect all traffic safety reporting and investigation requirements established by the Registry of Motor Vehicles. For contractor operated vehicles, MWRTA coordinates efforts with the contractor's safety manager to investigate an accident, requiring a prompt and detailed report of the accident, contributing factors, and any casualties or injuries sustained. For non-operator vehicles and facility related events, MWRTA coordinates with the insurance vendor to investigate and provide a detailed a report.

The Chief Safety Officer maintains all documentation of MWRTA's investigation policies, processes, forms, checklists, activities, and results. Any accidents are logged in the MWRTA Safety Risk Register, including whether:

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

The Chief Safety Officer will engage and utilize MWRTA executive staff as necessary, to conduct this determination and will work with the appropriate staff on resolution if required.

*Describe activities to monitor information reported through internal safety reporting programs.*

The Chief Safety Officer routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer and operations staff ensure that the concerns are investigated or analyzed through MWRTA's SRM process.

The Chief Safety Officer also reviews internal and external reviews, including audits and assessments, with findings concerning MWRTA's safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.

## 4. Safety Promotion

### Competencies and Training

*Describe the safety training program for all agency employees and contractors directly responsible for safety.*

MWRTA's comprehensive safety training program applies to all MWRTA employees and contractors directly responsible for safety, including:

- Bus vehicle drivers,
- Dispatchers,
- Facilities personnel,
- Vehicle maintenance technicians,
- Managers and supervisors,
- Agency Leadership and Executive Management,
- Chief Safety Officer, and
- Accountable Executive.

#### Driver Training:

MWRTA oversees driver and dispatcher training conducted through the respective mode's contractor. The contractor, as part of the RFP process, must submit to the authority a detailed safety training program overview. This program is a major determining factor in awarding an operating contract to a potential vendor. Vendors who fail to submit a detailed plan or are found to have an insufficient plan in place are remediated as part of the RFP process or are disqualified from providing operating service to the Authority. MWRTA regularly audits the contractor safety program and requires that all new hires participate in and demonstrate command of the safety training, rules and regulations of the contractor. MWRTA routinely monitors safety performance of drivers and dispatchers and will require retraining of any employees found to be in violation of the submitted policies and procedures of the contractor. Repeated safety violations of a contractor could result in a demand to the contractor that the person in question not operate MWRTA owned equipment.

#### Maintenance Training:

Vehicle maintenance safety-related skill training includes the following:

- Ongoing vehicle maintenance technician skill training,
- Ongoing skill training for vehicle maintenance supervisors,
- Auto Service Excellence (ASE) training,
- Commercial Driver's License (CDL),
- Hoisting License,
- Accident investigation training for vehicle maintenance supervisors,
- Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and
- Training provided by vendors.

#### Refresher training:

All employees must undergo refresher training on policies, practices, and procedures to ensure that employees have the latest and most up to date training information and that the training is retained and reinforced. Contractors operating revenue vehicles must undergo a refresher policy training annually and undergo a skill based defensive driving program every two years. Licensure training is renewed and maintained at the required intervals for the license. For employees not directly operating revenue vehicles or hazardous equipment, reminders of the MWRTA safety program and the facilities in place to report any observed hazards are discussed on a regular basis, with at least an annual comprehensive reminder/training of the safety program, its policies and procedures.

MWRTA's Accountable Executive, Chief Safety Officer, Agency Leadership and Executive Management team must complete FTA's SMS Awareness online training.

### **Safety Communication**

*Describe processes and activities to communicate safety and safety performance information throughout the organization.*

MWRTA's Chief Safety Officer and Director of Human Resources and Training coordinate MWRTA's safety communication activities for the SMS. MWRTA's activities focus on the three categories of communication activity established in 49 CFR Part 673 (Part 673):

- Communicating safety and safety performance information throughout the agency: MWRTA communicates information on safety and safety performance in its monthly newsletter and during weekly MWRTA operations meetings. MWRTA also has requested the contractor maintain a permanent agenda item in all drivers' meetings dedicated to safety. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact MWRTA's service or safety performance, and updates regarding SMS implementation. Finally, MWRTA's Director of Human Resources posts safety bulletins and flyers on the bulletin boards located in all employee break rooms, advertising safety messages, and promoting awareness of safety issues.
- Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency: As part of new-hire training, MWRTA distributes safety policies and procedures, included in the MWRTA Employee Handbook, to all employees. MWRTA provides training on these policies and procedures and discusses them during safety talks between supervisors, bus drivers, and vehicle mechanics. For newly emerging issues or safety events at the agency, MWRTA's Chief Safety Officer issues bulletins or messages to employees that are reinforced by supervisors in one-on-one or group discussions with employees.
- Informing employees of safety actions taken in response to reports submitted through the ESRP: MWRTA provides targeted communications to inform employees of safety actions taken in response to reports submitted through the ESRP, including handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors.
- At the end of 2019, the world experienced an expanding outbreak of respiratory illness caused by a novel coronavirus (COVID-19 Pandemic). FTA encourages transit agencies to be informed and prepared. MWRTA adheres to FTA guidelines during COVID-19.

## **Additional Information**

### **Supporting Documentation**

*Include or reference documentation used to implement and carry out the ASP that are not included elsewhere in this Plan.*

MWRTA Employee Handbook

Contractor Employee Handbook

The MWRTA retains required SMS documentation for at least three years and will make this documentation available upon request to the FTA or other Federal entity, or a State Safety Oversight Agency having jurisdiction.



## Definitions of Special Terms Used in the ASP

| Term   | Definition   |
|--|--|
| Accident   | Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.  |
| Accountable Executive  | A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; 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. |
| Equivalent Authority   | An entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan   |
| Event  | Any Accident, Incident, or Occurrence.   |
| Hazard   | Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.  |
| Incident   | An event 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  | The process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.  |
| National Public Transportation Safety Plan                       | The plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.  |
| Occurrence   | An Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency. <b>Damage must be in excess of \$5,000.</b>   |
| Performance measure  | An expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.   |
| Public Transportation Agency Safety Plan (or Agency Safety Plan) | The documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.  |
| Risk   | The composite of predicted severity and likelihood of the potential effect of a hazard.  |
| Risk Mitigation  | A method or methods to eliminate or reduce the effects of hazards.   |
| Safety Assurance   | Processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.   |
| Safety Management Policy   | A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.   |
| Safety Management System   | 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  | A performance target related to safety management activities   |
| Safety Promotion   | 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   | The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.   |
| Safety Risk Management   | A process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.   |

|                                      |  |
|--------------------------------------|--|
| <p>Serious Injury</p>                | <p>Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when 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.</p> |
| <p>Transit agency</p>                | <p>An operator of a public transportation system.</p>  |
| <p>Transit Asset Management Plan</p> | <p>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.</p>  |

**List of Acronyms Used in the ASP**

| <b>Acronym</b> | <b>Word or Phrase</b>  |
|----------------|--|
| ADA            | American's with Disabilities Act of 1990                     |
| ASP            | Agency Safety Plan (also referred to as a PTASP in Part 673) |
| Authority      | MetroWest Regional Transit Authority (Agency)                |
| CFR            | Code of Federal Regulations                                  |
| ESRP           | Employee Safety Reporting Program                            |
| FTA            | Federal Transit Administration                               |
| MassDOT        | Massachusetts Department of Transportation                   |
| MPO            | Metropolitan Planning Organization                           |
| MWRTA          | MetroWest Regional Transit Authority (Agency)                |
| Part 673       | 49 CFR Part 673 (Public Transportation Agency Safety Plan)   |
| SMS            | Safety Management System                                     |
| SRM            | Safety Risk Management                                       |
| USC            | United States Code   |
| VRM            | Vehicle Revenue Miles  |