Public Transportation Agency Safety Plan

Mecklenburg County Transportation System

MTS
Mecklenburg Transportation System

June 2024

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Section 1. Transit Agency Information
General Information – Mecklenburg County Transportation

Accountable Executive: Masie Jones, Social Services Manager

Chief Safety Officer: Stephanie Wells, Social Services Program Coordinator

Address:

> DSS Main Office
> Wallace H. Kuralt Centre
> 301 Billingsley Road
> Charlotte, NC 28211

Modes of Service: Demand Response

FTA Funding Sources: FTA Section 5307

Modes of Service Directly Provided: ☒Demand Response (DR)

Brief description of services provided:

Mecklenburg Transportation System (MTS) is a service within the Mecklenburg County Department of Social Services (DSS) that provides approved non-emergency subscription route and demand response transportation to eligible consumers within Charlotte/Mecklenburg County. Some service is provided by a coordinated effort with neighboring county transportation system.

Transportation is provided seven days a week depending on the service program from 5:00a.m. until 7:00p.m., except December 25. Transportation is provided using MTS certified county drivers and vehicles. MTS also contracts with transportation vendors such as taxicab companies and private companies to transport citizens to their destinations. These vendors must meet all of the local Passenger Vehicle for Hire (PVH) guidelines. MTS has wheelchair equipped vehicles to help with specialized transportation needs. Although MTS contracts with taxicab companies, MTS services are to be used to take customers to medical appointments or other destinations approved by DSS. The transportation service provided by MTS and its contracted providers is not a taxi service.

The Agency 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.

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Section 2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Mecklenburg County Transportation	

Signature by the Accountable Executive	**Signature of Accountable Executive**	**Date of Signature**
		June 11, 2024

	Name of Individual/Entity That Approved This Plan	**Date of Approval**
Approval by the Board of Directors or an Equivalent Authority	George Dunlap- Mecklenburg County Board of Commissioners	
	Relevant Documentation (title and location)	

	Name of Individual/Entity That Certified This Plan	**Date of Certification**
Certification of Compliance		
	Relevant Documentation (title and location)	

Version Number and Updates			
Record the complete history of successive versions of this plan.			

Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	n/a	Original Document	12/01/2020
2	Pg 28 Section 4. H	Updated name of facility	06/11/2024

Annual Review and Update of the Public Transportation Agency Safety Plan

Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.

This MTS Agency Safety Plan will be jointly reviewed and updated by MTS's Accountable Executive and Chief Safety Officer by July 1st of each year. The Accountable Executive will review and approve any changes, sign the revised Agency Safety Plan (ASP), and forward to the Mecklenburg County Board of Commissioners for final review and approval.

Along with annual updates, MTS may update the plan if MTS:

• Determines is approach to mitigating safety deficiencies is ineffective.

• Makes significant changes to service delivery.

• Introduces new processes or procedures that may impact safety.

• Changes or re-prioritizes resources available to support Safety Management Systems and the Public Transportation Agency Safety Plan.

• Changes are made to facilities, equipment or rolling stock with a potential to safety.

• A change in contractors; and/or

• Significant changes to MTS's organizational structure

Revisions will be submitted to the County Board's Health and Human Service Committee with recommendations to the full Board of County Commissioners. Upon adoption by the Board, revisions will be communicated to MTS's staff and contractor employees.

Section 3. Safety Performance Targets

Mode of Transit Service	Fatalities (total	Injuries (Total / 100k VRM)	Safety Events (Total/ 100k VRM)	System Reliability (Total/ 100k VRM)	Customer Satisfaction Percentage Annually
Paratransit- DR	0	30 / .15	10 / 2.00	30 / .05	90%

Safety Performance Target Coordination		
Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection the MPO safety performance targets.
MTS's Accountable Executive shares the Agency Safety Plan, including safety performance targets, with the Charlotte Regional Transportation Planning Organization (CRTPO), the region's Metropolitan Planning Organization (MPO), each year after its formal adoption by the Mecklenburg County Board of Commissioners.

Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Charlotte Regional Transportation Planning Organization (CRTPO)	12/15/2020

Section 4. Safety Management Policy

Safety Management Policy Statement

Mecklenburg County Transportation strives to provide safe, efficient, and courteous public and specialized transportation service throughout Mecklenburg County and the surrounding community. The Agency Safety Plan (ASP) has been developed to integrate safety into all the County's transit and Department of Social Services (DSS) system operations. By using the procedures contained in the ASP, the County can continue to improve the safety and security of the County's transit operation and services.

This ASP describes the policies, procedures, and requirements to be followed by management, maintenance, and operations personnel to provide a safe environment for MTS employees, customers, and the general public. The goal of this program is to eliminate the human and fiscal cost of avoidable personal injury and vehicle accidents.

Each department has a responsibility under the ASP. The Director and supervisors shall provide the continuing support necessary to achieve the ASP objectives. A key to the success of this effort is for employees to be aware that they are accountable for safely performing the requirements of their position. The success of the program also depends on all employees actively identifying potential hazards and making a commitment to the safety of others.

The County must be aware that decisions and actions often affect the safety of those in other operations. By following the processes described in the ASP, the County's transit system will continue to improve performance and safety of the system while creating a culture of safety.

Mecklenburg County Transportation's commitment is to:

♦ Support the management of safety through the provision of appropriate resources, that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization.

♦ Integrate the management of safety among the primary responsibilities of all managers and employees.

♦ Clearly define for all staff, managers and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of our safety management system.

♦ Establish and operate hazard identification and analysis, and safety risk evaluation activities, including an employee safety reporting program as a fundamental source for safety concerns and hazard identification, in order to eliminate or mitigate the safety risks of the consequences

of hazards resulting from our operations or activities to a point which is consistent with our acceptable level of safety performance.

♦ Ensure that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

♦ Comply with, and wherever possible exceed, legislative and regulatory requirements and standards.

♦ Ensure that sufficient skilled and trained human resources are available to implement safety management processes.

♦ Ensure that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills.

♦ Establish and measure our safety performance against realistic and data-driven safety performance indicators and safety performance targets.

♦ Continually improve our safety performance through management processes that ensure that appropriate safety management action is taken and is effective, and FTA SMS Framework

♦ Ensure externally supplied systems and services to support our operations are delivered meeting our safety performance standards.

The MTS Goals for Safety are established as follows:

♦ Require all prospective drivers to have at least a Class B CDL P endorsement permit as a minimum qualification prior to consideration for employment.
♦ Provide drivers with proper safety equipment.
♦ Review accident/incident records and define where problems reside.
♦ Identify, eliminate, minimize, and/or control all safety hazards.
♦ Establish a high level of safety comparable to other transit systems.
♦ Provide appropriate action and measures to obtain necessary safety-related agreements, permits and approvals from outside agencies, where applicable
♦ Reduce the number of preventable accidents and incidents.

The objectives of the ASP are the means to achieving its goals. They also provide a method of evaluating the effectiveness of MTS's safety efforts. The ASP objectives are:

♦ Integrate safety management and hazard control practices within each transportation department and with contract providers.

- Assign responsibilities for developing, updating, complying with, and enforcing safety policies, procedures, and requirements.

- Verify compliance with MTS safety policies, procedures, and requirements through performance evaluations, accident/incident trends, and internal reviews.

- Investigate all accidents/incidents, including identifying and documenting the causes for the purpose of implementing corrective action to prevent a recurrence.

- Increase investigation and systematic documentation of near misses.

- Identify, analyze and resolve safety hazards in a timely manner.

- Ensure that system modifications do not create new hazards.

- Train employees and supervisors on the safety components of their job functions.

- Conduct oversight and safety reviews of contract service providers.

MTS takes these commitments seriously as the lives of the County's riders, employees and the general public depend on the MTS and its contractor's ability to operate in a culture of safety.

_____

Accountable Executive

_____

Date

Safety Management Policy Communication

MTS realizes the importance of ensuring its employees and riders are aware of MTS safety management policies and procedures to effectively manage the system's day to day operations. To do this, MTS relies on several forms of effective communication.

Employees: MTS is constantly evaluating existing policies and procedures to verify their effectiveness. To do this, MTS seeks input from all staff to determine if change is necessary based on trends, data analysis, operational changes, or new assets. Several methods are used to communicate policy and/or procedure changes, including:

- ♦ Employee memorandum requiring acknowledgement signature.
- ♦ Route Match messages.
- ♦ Bulletin board notices.
- ♦ Employee email notification.
- ♦ Departmental/Shift Team meetings.
- ♦ Group discussions.

MTS includes a training element for safety management policies impacting safety or service delivery and is conducted before the policy effective date. New policies and procedures are incorporated into orientation training for new employees as well.

Depending on the importance of the policy or procedure change, an acknowledgement signature is required of each employee verifying their understanding of the change.

Contractors: MTS provides oversight of all contracted service providers to ensure SMS methods are in place and followed. Through regular monthly meetings and oversight by the Contract Administrator, MTS is able to communicate changes to the ASP and the impacts with each contractor.

Riders: If a rider policy is changed or added, MTS notifies riders through the following methods:

- ♦ Notice posted on vehicle and facilities including effective date and who to contact for more information.
- ♦ Changes to digital rider guidance including schedules and ride guides as appropriate.
- ♦ Social Media
- ♦ Any services impacted by policies changes will include outreach as required by Federal Guidance.

Authorities, Accountabilities, and Responsibilities

As mentioned in the Safety Policy Statement, the ultimate authority for the success of this ASP falls to the Accountable Executive (AE). The Chief Safety Officer (CSO), the administration and management team, as well as employees fulfilling their commitment to safety on a day-to-day basis support the AE.

Accountable Executive (AE)

The Accountable Executive will determine, based on feedback from senior staff, the level of Safety Management System principals to maintain to ensure a safe work environment, rider experience and community safety. MTS's AE is committed to providing employees with the tools and training needed to be successful and safe in their roles with MTS. The AE will continually strive to create a culture of safety among the employees, and MTS expects each employee to play a role in maintaining a safe workplace.

MTS's AE is accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's public transportation system. The AE is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS. She may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the AE.

The current AE, Masie Jones, is also the Social Services Manager and has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan for the transportation department under DSS; 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.

Chief Safety Officer (CSO)

MTS has concluded that one CSO will be needed to manage the day-to-day adherence to this Plan and, while in this role, report directly to the AE. The CSO will monitor safety and security throughout the transportation system including contractors. All departments have been notified of the CSOs' role and the established reporting requirements relating to safety-related matters. The CSO has been adequately trained for this role and has the authority and responsibility for day-to-day implementation and operation of MTS's SMS. MTS's CSO is also the Training Coordinator, a position currently held by Stephanie Wells.

MTS's CSO will be responsible for the following:

- ♦ Developing and maintaining SMS documentation.
- ♦ Directing hazard identification and safety risk assessment.
- ♦ Monitoring safety risk mitigation activities.
- ♦ Providing periodic reports on safety performance.
- ♦ Briefing the Accountable Executive on SMS implementation progress; and
- ♦ Planning SMS training.

Roll of Staff to Develop and Manage Safety Management Systems (SMS)

Accountable Executive (AE)

The Accountable Executive (AE), who also serves as Executive Director, will work with the Chief Safety Officer (CSO) and administrative staff to adjust the ASP as needed based on staff feedback, trends, and data analysis. The AE is vested with the primary responsibility for the activities of the transit system and overall safety performance. The AE fulfills these responsibilities by providing the resources necessary to achieve ASP goals and objectives by exercising the approval authority for system modifications as

warranted. The AE also sets the agenda and facilitates the cooperative decision making of the management team.

Chief Safety Officer (CSO)

For purposes of managing the SMS and ASP, the CSO will report directly to the AE to determine strategy, policy, and goals for maintaining safety and security for passengers, employees, and the public. The CSO will monitor day to day operations and work with staff to identify and mitigate risk through evaluation, feedback, and data analysis.

The MTS CSO is specifically charged with the following responsibilities for the System Safety Program:

- ♦ Have full knowledge of all standard and emergency operating procedures.

- ♦ Perform safety audits of operations.

- ♦ Ensure that employees make safety a primary concern when on the job.

- ♦ Actively investigate all incidents and accidents.

- ♦ Prohibit unsafe conduct and conditions.

- ♦ Conduct safety meetings.

- ♦ Listen and act upon any safety concerns raised by employees; and

- ♦ Report to management any safety concerns or possible hazards.

Supervisors

Supervisors are responsible for the safety performance of all personnel and equipment under their supervision. They are responsible for the initial investigation of all accidents and incidents, and for reporting these accidents and incidents to the Human Resources, Risk Management and Transportation Operations Department.

Because of the close relationship with the employee and intimate knowledge of operating procedures, supervisors are the key persons regarding loss control. They serve as the point of implementation for most safety activities. Therefore, supervisors shall assume the responsibility of thoroughly instructing their personnel in safe practices to be followed in their work situations. Supervisors of each department are charged with the responsibilities of quality and quantity of production within the department, and therefore are responsible for the work conduct of same. They shall consistently enforce safety standards and requirements to the utmost of their ability and authority. Supervisors shall be proactive in eliminating any potential hazards concerning activities under their purview, and they shall set an example of good safety practice.

Supervisors are charged with daily operational oversight. Supervisors should be afforded the necessary knowledge to carry out their duties with efficiency and safety. They will receive and conduct training designed to lessen the likelihood of injury to staff or damage equipment. Supervisors will be encouraged and, in some cases, mandated to secure training or information from various sources that will sustain or increase their knowledge of the operation. It is the responsibility of the Supervisors to:

- Have a thorough knowledge of the System Safety Policy and have a working knowledge of State and Federal regulations such as DOT and ADA.

- Provide instruction and training to workers so that they conduct their job in a safe manner. (See section on Training Employees)

- Make daily inspections of MTS's area and neighboring workspace to ensure that no unsafe conditions or unsafe practices exist.

- Initiate a recommendation to Safety Coordinator for immediate corrective action where unsafe conditions or practices are found. When a capital expenditure is required to make necessary corrections, a written recommendation will be forwarded to the Safety Coordinator, Risk Management and Manager.

- Properly complete accident reports and investigate all accidents to make recommendations for final approval by the Safety Coordinator on what must be done to prevent recurrence of a similar accident.

- Be familiar with procedures that must be followed in case of an emergency; establish positive relationships with local agencies such as law enforcement, Fire and Medic.

- Enforce safety rules and regulations of the organization.

- Be aware and advise the Safety Coordinator of any new trends that result in injury to staff or damage to equipment and receive periodic updates on progress of existing trends by the Safety Coordinator.

- Set a good example for safety by working in a safe manner and encouraging others to do so.

Employees

All MTS personnel are responsible for performing their work safely and for following established safety-related rules, procedures, and work practices. This includes reporting all accidents, incidents, and hazards to their supervisor per established requirements for the protection of themselves, co-workers, customers, facilities, and equipment.

To ensure that the employee has a keen sense of safety awareness it will be the responsibility of the employee:

- To abide by the safety rules and regulations of the organization and seek clarification for abnormal circumstances.

- To regard the safety of fellow workers and the public always.

- To report any unsafe condition that has potential to result in injury to staff or damage to equipment to the Supervisor on duty.

- To contribute ideas and suggestions for improving the safety of conditions or procedures to the Supervisor.

- ♦ To use individual knowledge and influence to prevent accidents.

- ♦ To attend safety training sessions.

- ♦ To report accidents and injuries immediately.

- ♦ Wearing the prescribed uniform and employing all safety equipment necessary to perform the essential job requirements.

- ♦ Reporting, no matter how slight, all fires, accidental damage to property, hazardous material spills and other emergency occurrences to your supervisor,

- ♦ Disposing of all hazardous materials in an acceptable and lawful manner.

- ♦ Working under the influence of alcohol or illegal drugs is specifically forbidden. Use of prescription drugs, which may affect your alertness or work abilities, shall be reported to your supervisor (49 CFR parts 40, and 655)

- ♦ Taking care not to abuse tools and equipment, so these items will be in usable condition for as long as possible, as well as ensure they are in the best possible condition while being used.

Key Staff

MTS staff will be responsible for maintaining high standards of safety, customer service, and security. The Employee Safety Reporting Policies (ESRP) will define the employees' role to identify and mitigate risk through open communication to superiors including the CSO and AE. Administrative staff will be instrumental in ensuring action is taken to reduce risk and the whole system is continuously monitored to ensure actions are effective and appropriate.

County transit staff will be involved with updates, modifications, and implementation of the ASP. Each staff member brings a valued perspective to the development of policies and procedures he or she will be expected to implement. Every opportunity will be given for employees and riders to provide input to increasing safety at MTS. Those opportunities include monthly safety meetings, safety review committee meetings, shift team meetings, customer and employee surveys and an open-door policy with access to all management staff.

Employee Safety Reporting Policies (ESRP)

As stated in the Safety Management Policy Statement, MTS is determined to provide a safe working environment for its employees, riders and the general public. To ensure success, MTS has developed an ESRP to enable employees to report any risk or perceived risk to a supervisor, CSO, or member of administration.

The ESRP allows each employee to report detailed information and observations whether they are a driver in service, maintenance staff, or other on-duty employee. This program dovetails with other methods currently in place to proactively identify hazards or threats. Those methods include but are not limited to the following:

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- ♦ Pre/Post Trip Inspections
- ♦ Preventive Maintenance Inspections
- ♦ Employee Evaluations
- ♦ Facility Maintenance Plan
- ♦ Service Evaluation and Planning Program
- ♦ Training Program
- ♦ Rider and Public Complaint/Compliment Process
- ♦ Safety and Employee Meetings
- ♦ Incident/Accident Policies
- ♦ Facility and Safety Review Committees
- ♦ Anti-Retaliation Policy
- ♦ Discrimination Policy

MTS has modified its Incident Report Form to identify and provide information about hazards observed by MTS employees while on-duty. The one-page form identifies vital information to assist employees in determining an action to mitigate the threat or hazard. This form is not meant to replace accident forms currently being used, but instead used in conjunction with the accident forms. It is proactive reporting method to identify a perceived threat or hazard, potentially endangering employees, riders, or the general public. The form serves a dual role as an incident, illness, and near miss report. The form is located the Appendix of this Plan.

All hazards reported through the Employee Safety Reporting Program go straight to the Chief Safety Officer for review, assessment, investigation, mitigation and follow-up. If the hazard directly impacts the working relationship between two or more employees, the Chief Safety Officer will ensure no retaliation or hostile work environment will take place. The County DSS and its contract service providers will ensure that no action will be taken against any employee who discloses a safety concern through the respective Employee Safety Reporting Program unless the employee engaged in 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.

All transit contracted service providers will follow MTS's Employee Safety Reporting Program encouraging employees who identify safety concerns in their day-to-day duties to report them to contract management or MTS's Contract Administrator in good faith without fear of retribution.

There are many ways MTS employees can report safety conditions:

- ♦ Report conditions directly to the dispatcher, who will add them to the daily Operations Log.
- ♦ Report conditions anonymously via locked comment box in the driver area.
- ♦ Report conditions directly to any supervisor, manager, or director.

Examples of information typically reported through the ESRP include:

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- Safety concerns in the operating environment (for example, county or city 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 senior managers might not otherwise know about (for example, near misses); and
- Information about why a safety event occurred (for example, radio communication challenges).

Effective January 31, 2020, all MTS employees will receive one hour of training on the procedures associated with the updated Incident Report Form. The training will cover the following areas:

- Locations of blank Incident Report Forms
- When to use an Incident Report Form.
- Capturing critical information on the form.
- Notification process depending on the hazard.
- Proper assessment of the reported hazard.
- Levels of likelihood of repeat.
- Supervisor and CSO role in completing the form.
- Follow-up process to determine effectiveness of mitigation.

The following process is used as part of the ESRP.

Immediate Action Required

If a transit employee has identified a hazard which is perceived to be a risk to the employee, fellow employees, passengers, or the public it must be reported immediately to the on-duty supervisor/dispatcher/team leader. Once reported the employee must determine if immediate action is necessary to prevent additional risk. If so, that action must be communicated to a supervisor if time allows. Once action has been taken to mitigate the potential harm to employee, others, or property, contact the supervisor of the results of actions taken. Once able, the employee will complete the Incident Report Form with complete information and give to the on-duty supervisor.

Delayed Action Required

Once a hazard has been identified, MTS employee should assess if the hazard requires immediate action to reduce the risk or if delayed action can be taken. If the employee determines delayed action is appropriate a full report must be completed using the Incident Report Form and submitted to the on-duty supervisor.

Role of Supervisor

The on-duty supervisor is responsible for advising the employee on immediate action or delayed action to mitigate a hazard. The supervisor must then review the Incident Report Form to ensure all information is included adding additional information from their perspective. Once the form is complete it must be reviewed by the CSO to determine if additional action is necessary, investigate root cause of hazard and follow-up.
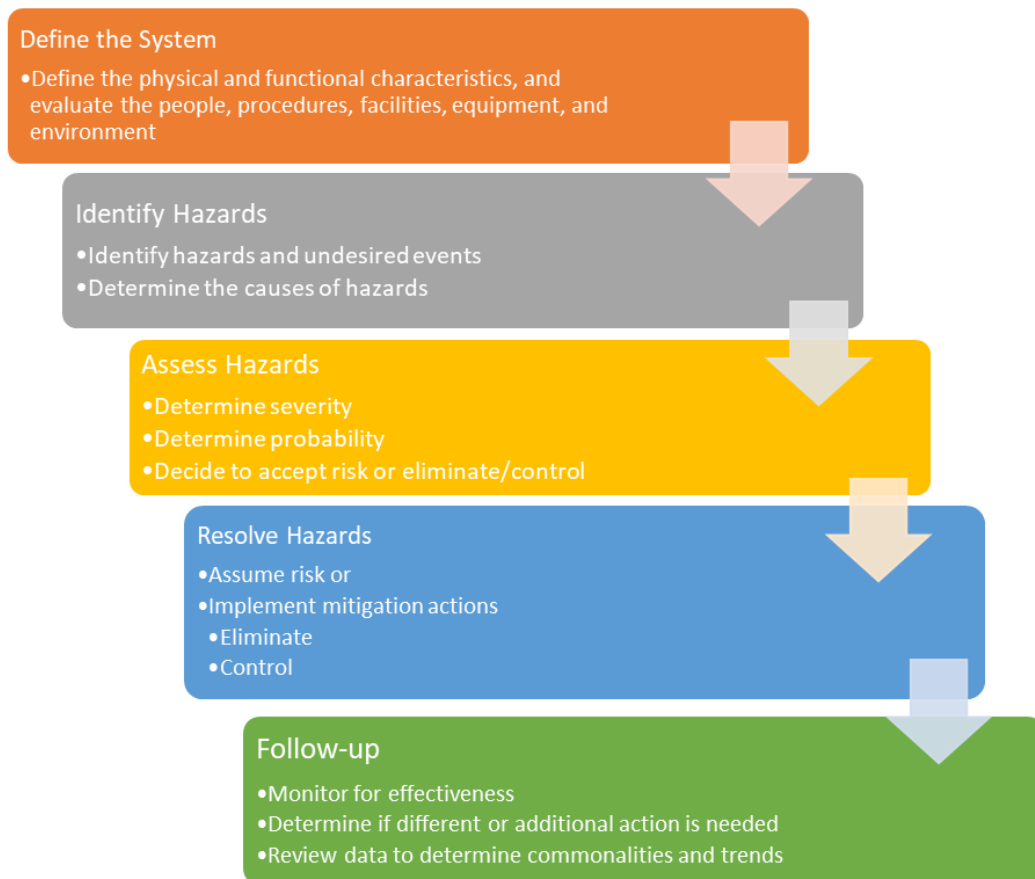
The CSO is responsible for determining the status of each hazard reported. In some cases, hazards may be identified and are not able to be resolved but actions are taken to reduce the risk of the hazard. It is MTS's goal to eliminate all identified hazards if possible. Some hazards may require continuous monitoring to ensure the hazard does not elevate to an action level.

All incident reports will be documented and integrated into current performance measures and data collection process through TransWeb, MTS's management software. The CSO will track each hazard to completion and recommend policy or procedural changes if needed as a result of the hazard mitigation.

MTS's Responsibility

MTS takes every hazard report seriously and investigates each one to determine if it's an isolated case, or emerging trend requiring evaluation of policies and procedures or service modifications. Employees reporting hazards will not face disciplinary action unless that employee contributed to the hazard. MTS wants to encourage all employees to report any hazard or threat they observe and help make MTS system as safe as possible for its employees, riders, and the general public. Employees may report the hazard to their immediate supervisor or go directly to the CSO to submit and discuss their report.

The following process chart illustrates the steps taken as part of the hazard identification process through the ESRP.

Define the System
- Define the physical and functional characteristics, and evaluate the people, procedures, facilities, equipment, and environment

Identify Hazards
- Identify hazards and undesired events
- Determine the causes of hazards

Assess Hazards
- Determine severity
- Determine probability
- Decide to accept risk or eliminate/control

Resolve Hazards
- Assume risk or
- Implement mitigation actions
  - Eliminate
  - Control

Follow-up
- Monitor for effectiveness
- Determine if different or additional action is needed
- Review data to determine commonalities and trends

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Section 5. Safety Risk Management

MTS provides training to all personnel in the identification of hazards and security threat while also providing tools to enable personnel to report these risks. Once the risk has been identified, MTS conducts an assessment of the risk to determine the necessary response and response time. The response may include further investigation or monitoring, action(s) to mitigate the hazard or security threat and follow-up assessment to ensure action taken is appropriate and effective.

Safety Hazard Identification:

Hazard and security threats are identified through different methods of monitoring the system. This includes system, employee and asset assessments conducted daily and on incremental basis. Additionally, MTS communicates with peers across the state, FTA and NCDOT to identify common hazards impacting multiple systems. MTS conducts the following periodic and random evaluations of the system in the following departments:

Personnel

Each MTS employee is evaluated annually to ensure they are performing their job to the expectations of MTS. As part of their orientation process the employee is provided training and tools to perform their job while not receiving permanent status until completing 180 days of employment. During the 180 - day period, the employee is evaluated to determine if they are properly prepared to perform their job.

Additional evaluations of the employee are conducted throughout the year through spot-checks of some aspect of their job function. If through spot-check or annual evaluation it is determined the employee's performance does not meet expectations or training standards, remedial training will be provided, and additional evaluations will take place to ensure remedial training was effective. Evaluations include ride along, follow-along and video reviews.

Assets

Rolling stock, facilities and equipment are monitored through a vigorous preventive maintenance plan aimed at identifying hazards and deficiencies as part of daily and scheduled inspections. Operations and Maintenance Departments coordinate the preventive maintenance program including daily Vehicle Inspection Reports (VIR)s, incremental and annual inspections. MTS's Maintenance Department located at the 12th Street Garage, also performs inspections of all rolling stock to further monitor for deficiencies at intervals based on the manufacturer's recommendations. All maintenance information is documented in NCDOT's Asset Works, fleet and maintenance reporting software.

MTS updates the FTA required Transit Asset Management (TAM) Plan annually with data relevant to each asset to include a condition assessment, miles (with rolling stock and non-revenue vehicles) and age as to whether the asset is in a State of Good Repair (SGR). The TAM Plan allows MTS management to plan asset replacement or rehabilitation for future years.

System

As part of MTS's safety management system monitoring, the agency uses service evaluations when planning, spot-checking, or responding to an event like an accident or incident. Demand response routes are strategically developed, with safety being the first priority, passenger access second and service

efficiency third. MTS's call intake staff and schedulers plan and test routes periodically to determine performance and safety.

All front-line staff have been trained to note any changes to service which may be considered a hazard or security threat and through the ESRP, notify their supervisors immediately or upon return to MTS depending on the severity of the hazard.

Hazard Identification Procedure

Any employee seeing something through inspection or observation they deem to be a hazard are instructed to immediately report that hazard to the immediate supervisor regardless of the perceived level of threat. Depending on the situation, either the immediate supervisor or the employee will complete a Complaint/Incident Report and submit it to the CSO.

If the hazard requires immediate mitigation, the employee will be instructed on steps to take to reduce the risk which may or may not alleviate the risk completely. Additional actions may be taken once the immediate risk mitigation has been taken. Some hazards may not pose an immediate risk but are still reported and the CSO will be responsible for risk assessment, investigation, and mitigation strategy.

In some cases, a passenger or member of the general public may call MTS with a complaint about a front-line employee which may rise to the level of hazardous behavior or actions. MTS currently documents all customer complaints/compliments and takes appropriate action to investigate any complaints. Complaints deemed hazardous will trigger immediate action by on-duty supervisors.

Incident and accident forms will be located on all vehicles along with standard safety kits for accident and incident reporting, with all Customer Service Representatives (CSR)'s, Dispatch, Operations, and Maintenance Departments. A copy of the form is located in the Appendix.

Accident and Incident forms will require the employee to briefly describe the hazard noting date, time of day, location, and other pertinent information. The form includes a section for the CSO or immediate supervisor to document immediate action taken to reduce risk, a risk assessment chart prioritizing the risk, and a section for additional follow-up action. All forms will be processed by the CSO and summarized periodically for trend analysis and include in safety performance measures. All information from the forms will be documented in TransWeb allowing multiple supervisors access and ability to update the file as each SMS step is conducted.

If an employee is injured while performing their job with MTS, supervisors will work with the employee to ensure an On-the-Job Injury Report is completed per the standards set by Mecklenburg County.

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49 CFR part 673.5

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.

Safety Risk Assessment

All County staff have been provided with training appropriate for their positions within the organization. MTS expects its employees to respond to hazards or threats with professional judgement as sometimes there might not be time to contact a supervisor to prevent an emergency event. In cases where the hazard can be reported without immediate risk, the employee will make an initial assessment of the risk as part of their report.

Once received by the CSO, the initial risk assessment may be amended requiring immediate, short, or long-term response.

Level 1 - Immediate: A deficiency, threat or hazard requiring immediate attention to mitigate risk either temporarily until further action can be taken or complete mitigation.

Level 2 - Short Term: Action is needed within seven days to mitigate an identified deficiency, threat or hazard. The deficiency, threat or hazard does not pose immediate danger but if no action is taken could elevate to an Immediate level risk.

Level 3 - Long Term: A deficiency, threat or hazard has been identified but does not pose a threat currently but could at a later time. Continued monitoring and awareness are required.
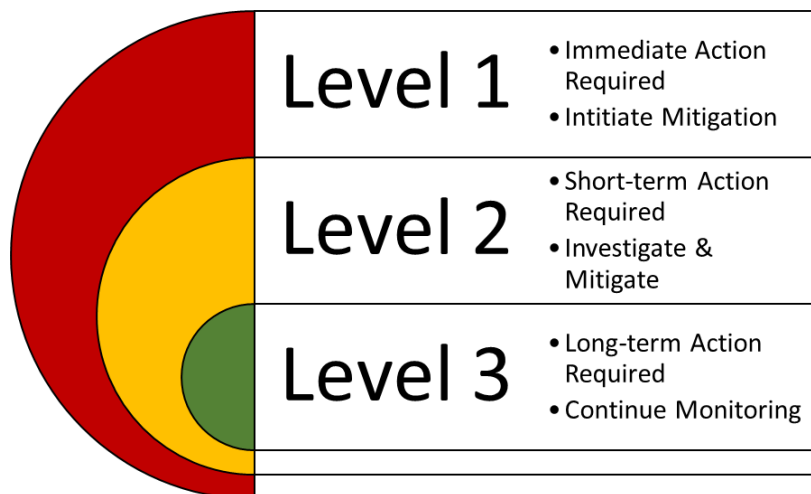
Additionally, the supervisor on-duty or the CSO will conduct an additional risk assessment to determine the level and timeline of mitigation response using the below Risk Assessment Matrix. The matrix allows MTS to further define the initial assessment as well as modify mitigation strategies as appropriate. In some cases, complete risk removal may not be achieved, but reduced to the point of safe operation with routine monitoring of the risk.

The Risk Assessment Matrix includes four levels of consequence severity and five levels of likelihood of the risk/hazard repeating. For example, broken glass at a bus stop shelter may be the result of an isolated incident with a "Occasional" chance of repeating, but the consequence of not mitigating the broken glass may have "Critical" level of severity if not mitigated resulting in a "Medium" level of response. Initial mitigation actions might include sending a notice to all passengers through web and social media outlets indicating the stop is closed until further notice; place safety tape around the stop; instruct all drivers on the route of the hazard; remove all remnants of broken glass. Additional actions would be to schedule glass repairs or shelter replacement.

Risk Assessment Matrix				
Likelihood/ Severity	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)	LOW	LOW	LOW	LOW

Safety Risk Index	Criteria by Index
HIGH	Unacceptable – Action Required: Safety risk must be mitigated or eliminated.
MEDIUM	Undesirable – Management Decision: Executive management must decide whether to accept safety risk with monitoring or require additional action.
LOW	Acceptable with Review: Safety risk is acceptable pending management review.

The CSO in coordination with staff will investigate each identified hazard, assess the risk, and take appropriate action to mitigate the risk. Additional mitigation may be needed based on follow-up monitoring to the action taken. All updates are documented through TransWeb.

Mecklenburg County Transportation System – Agency Safety Plan

Safety Risk Mitigation

In response to all identified and assessed hazards, MTS will take steps to mitigate the hazard and reduce or eliminate the risk to employees, riders, and public. Mitigation strategies will be dependent on results of investigation into the elements contributing to the risks. The investigation may include more than one department and may include interviews outside of the transit system.

Actions to mitigate risk will include all employees, riders, and public who may be impacted by either the hazard or the actions to reduce or alleviate the risk. MTS will communicate actions to appropriate staff through methods appropriate risk assessment. In some cases, immediate communication through two-way communications (dispatch system, text burst, email, or web alert) may be necessary. In other cases, bulletin board notices or memorandum posting may be appropriate.

Once a risk mitigation strategy has been implemented, MTS will monitor the actions to determine if full mitigation is possible and if not, is additional action necessary to alleviate the risk or is stepped up monitoring necessary. Some risks may not be completely mitigated but awareness to the risk will is a top priority.

All actions taken to mitigate risk will be responsibility of the CSO, documented and linked to the initial deficiency, threat, or hazard identification step.

Mecklenburg County Transportation System – Agency Safety Plan
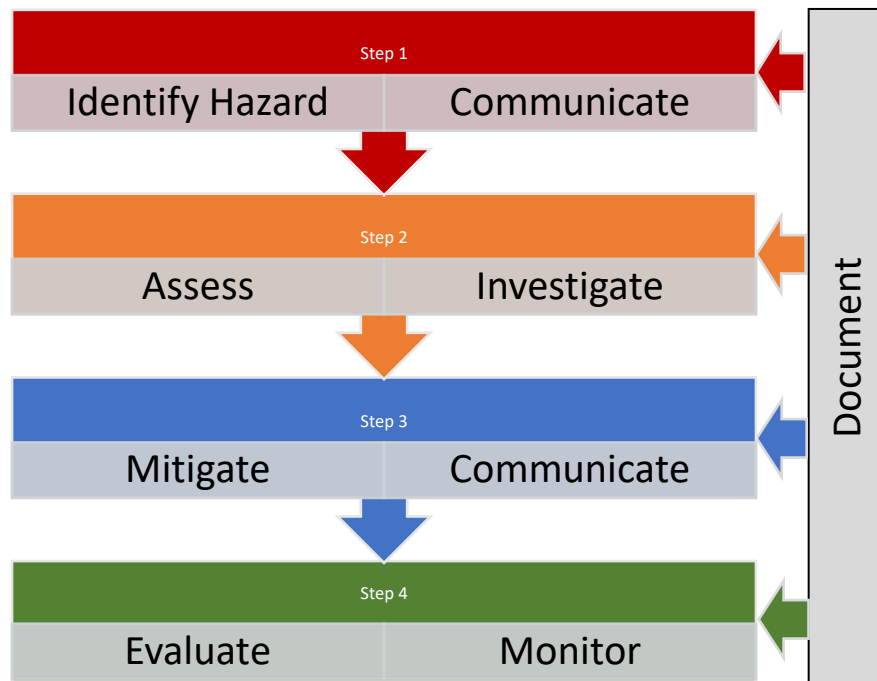
Section 6. Safety Assurance

Safety performance monitoring and measurement involves the continual monitoring of the transit agency's activities to understand safety performance. Through these efforts, MTS can determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing SMS.

MTS is constantly striving to maintain the highest level of safety through its monitoring methods to include adherence to policies and procedures, safety and maintenance plans, and system and employee evaluation processes. These methods allow MTS to determine the need to make changes to improve policies, employee training and service delivery.

The CSO will monitor operations daily through observation, data analysis, communication, and safety updates to identify mitigation strategies that may be ineffective. If mitigation actions are found to be ineffective additional strategies will be developed through key and impacted staff feedback.

Maintenance

Maintenance Standards and Procedures. Standards and procedures are included in MTS Maintenance Plan. In general, maintenance procedures are designed to ensure that the maintenance recommendations of the manufacturer are met, maximum efficiency in performance and operation is obtained, and maximum bus life and condition are maintained. Daily bus inspections, an active County Preventive Maintenance Program, contractor oversight, and careful monitoring are included in procedures to ensure the safety of buses and adequacy of the Fleet Maintenance Plan.

Operator Inspections. All operators are required to perform a pre-trip and post-trip inspection to ensure that the vehicle is safe and in good operating condition. If any defects are noted by the operator, a Defect Slip is completed and, depending on the severity and extent of the defect, the vehicle may be repaired or taken out of service until a repair can be made. In the case of a defect that develops or is noted once a vehicle is in service, the operator is required to communicate the problem to Operations, who will then notify Maintenance.

Daily Servicing and Inspections. MTS Maintenance Department inspects, and services buses used in revenue service each day. The buses are charged and washed, all fluids are checked, tires and lugs are checked, and the vehicle is inspected for any leaks or unusual noises. When a defect is noted, it is reported to the Lead Mechanic or Supervisor on shift so that evaluation and, if necessary, a repair can be conducted.

Mileage-Based Maintenance Inspections. All buses receive preventive maintenance inspections (PMI) at designated mileage intervals. Mileages are determined by vehicle and subcomponent manufacturers and real-world experience. A description of the schedule and type of inspection and service performed for each bus series is included in MTS Maintenance Plan.

Operations

Facility Monitoring

Formal facility inspections of all County transit facilities and grounds are conducted by MTS Maintenance/Safety/Facilities throughout the year, depending on the facility. The purpose of the inspections is to identify any unsafe or unhealthy conditions which may exist, and that may require maintenance or modification. Each facility is also visually inspected for compliance with OSHA and local fire codes.

Any guests to MTS's Administration office at the County DSS facility, must check in through a secured process requiring check-in and validation of visit purpose. Employees are trained on procedures for visitors in the workplace and facility access is limited through security systems.

Frequency

The Maintenance Department conducts its safety inspections as required by the Facility Maintenance Plan for each County transit facility. Mechanics and Facilities Maintenance employees look for potential hazards with equipment whenever they are using that equipment. The vehicle hoists, chain pulls, and cranes in the vehicle maintenance shop are inspected annually by contractors. Preventive maintenance of equipment and facilities is performed in accordance with the manufacturer's recommended practice. Hazards are also identified by analyzing work accident trends, through Complaint/Incident Report submitted by employees. Forms are used by employees to report safety concerns and to make safety recommendations.

Reporting

When hazards or deficiencies are noted, they are documented and reported to the director of the department in which the safety hazard is located. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor or CSO. Accident/Incident Report are routed to the department, Chief Safety Officer or director best equipped to evaluate the concern and, when necessary, propose a resolution.

Hazard Resolution

The primary purpose of facility inspections and hazard reporting is to identify conditions that could lead to accidents and losses. In view of this, it is crucial that all departments and employees be involved in the Facility Inspection and the Hazard Identification and Resolution processes. Hazard resolution is related to the severity of the hazard and the probability and severity of a negative consequence of the hazard.

Follow-up

Corrective action for a confirmed hazard that has been identified by any established process is the responsibility of the supervisor of the department area in which the hazard exists or the CSO. This includes arranging for the services of other County departments or outside parties, as necessary, to eliminate or control the hazard.

Documentation

Hazards that have been identified, proposed resolutions, and corrective actions are recorded in hard copy by the Safety Review Committee, maintained by CSO and documented in TransWeb.

All front-line personnel are responsible for monitoring safety and security as part of their respective positions. If a hazard is identified through observation or interaction with customers or the general public, it is reported to the immediate supervisor as well as following MTS's hazard reporting process.

Employee Hazard Reporting

Loss Reports

Employees can fill out an incident report which is turned into the effected department and the CSO, talk with a supervisor or the AE. They can also contact a Safety Committee member. Depending on the severity/risk of the hazard identified, immediate action may be taken, or the input will be brought to the Safety Committee for discussion. Feedback will be provided to the employee on what action, if any, will be taken. All employees follow applicable hazard reporting policies and procedures.

Service/Operations Safety

Employees can fill out an Incident Report or discuss suggestions for making the system/manifest safer. MTS encourages employees to be advocates for safety while also suggesting methods of increasing performance. Management has an open-door policy and makes clear the importance of employee feedback; positive and negative.

Safety Events

Accident and Incident Reporting Process

All accidents and loss incidents are to be investigated. MTS's safe driving standards require professional safe performance of all operators. To ensure better than average safety performance, MTS employs the National Transit Institute (NTI) guidelines to determine if a collision or onboard incident could have been prevented. All personnel operating any County transit vehicle are held to this standard.

The MTS Accident and Incident Policy includes procedures and responsibilities for accident/incident investigation. The policy establishes procedures for accident notification, response, and investigation.

Transit Operations coordinates with outside law enforcement agencies if they investigate an event. Administrative staff coordinates with outside insurance providers and provides support among County departments and independent investigation to manage County liability and claims.

Most accidents and incidents involving MTS are relatively minor in severity and are investigated by CSO. Since most accidents involve buses, this section focuses on bus accidents. However, all non-bus accidents and incidents are also investigated.

Notification

Bus Operators are to notify the operations system supervisor anytime a County transit vehicle might have been damaged, anytime a County transit vehicle and another vehicle come into contact, or anytime an instance occurs in where a customer may have been injured. An Operations Supervisor will be directed to the scene. Police and ambulance will be dispatched, if necessary.

At-Scene Procedures

Bus Operators will adhere to the following procedures defined in the MTS MTS Accident and Incident Policy:

1. Response to Any Accident

2. The operator, if physically capable, shall immediately notify the designated person in their department of any vehicle accident. The operator is required to establish voice contact with the designated person or to confirm receipt by him/her of any non-voice communication.

3. The designated employee(s) from the department will verify that the responsible law enforcement agency has been notified and emergency services, if needed, are contacted.

4. The department's designated employee(s) will respond to the accident scene to perform the following tasks:

    a. Determine the status of the County's operator, other parties, and property damage.

    b. Collect information needed to submit a "Vehicle Accident Report" to Risk Management within 24 hours of the accident. Forms are located at: https://claims.ci.charlotte.nc.us

    c. Contact the City of Charlotte Equipment Management Division (see contact phone numbers above) for all towing requests involving County owned or leased vehicles and to report any mechanical defects that may have contributed to the accident. Information concerning any mechanical failure should also be included in the report submitted to Risk Management. The County's contracted wrecker service provider is to be used for any County owned or leased vehicle that requires towing while in Mecklenburg County. The law enforcement agency investigating the accident may require the use of a rotation wrecker if the accident is outside of Mecklenburg County. Notify Equipment Management if this occurs.

    d. Inform Risk Management of any mechanical problems that may have contributed to the accident involving a rental vehicle or any other vehicle operated by an employee that is not owned by Mecklenburg County.

    e. Mecklenburg County is not responsible for the towing or storage of a personal vehicle used for County business.

    f. In addition to the "Vehicle Accident Report Form", an "On the Job Injury Report" must be completed for any County employee who is injured. An employee with a

serious injury should be transported by Emergency Medical Services (EMS) to the nearest emergency care facility. Employees requesting treatment for minor injuries that do not require EMS should be transported by the department to the nearest Urgent Care facility. Trips to the emergency room should be avoided for a minor injury provided an Urgent Care facility is open. Visit the "When to Use" link that is associated with the "On the Job Injury Report" for a list of approved Urgent Care facilities.

g. Take photographs of the accident scene and send to Risk Management along with the Vehicle Accident Report form.

h. Inform the chain of command of each involved employee so that the appropriate level of supervision can determine whether drug and alcohol tests must be completed by any employee. The appropriate supervisor will assure the completion of the necessary form(s) and will escort (or cause the escort of) the employee to the testing location (any Urgent Care location if open; otherwise, a Novant Health Presbyterian Emergency Room).

5. In the event of an accident outside of Mecklenburg County that prohibits the designated employee from responding to the scene of the accident, information concerning the accident should be collected and immediately provided to Risk Management and to Equipment Management if the accident involves a County vehicle. Risk Management may elect to send a representative to the accident scene to gather additional information and photographs.

6. Response to Vehicle Accident Involving Serious Injury or Major Property Damage - In addition to the procedures outlined in the previous section, the following procedures will be followed for any accident involving a serious injury or major property damage. These procedures will be followed even if the accident is outside of Mecklenburg County.

a. Immediately, while the vehicles are still at the accident scene, contact Risk Management with details of the accident. Risk Management will provide additional direction if the vehicles have been removed from the accident scene.

b. Avoid starting the vehicle or turning on the vehicle's ignition switch. Valuable information can be lost from the onboard computer if this occurs.

c. If directed by Risk Management, decide with Equipment Management for secure movement and storage of the County owned vehicle.

d. The law enforcement agency investigating an accident outside of Mecklenburg County may require that the County vehicle be towed to a local facility. In this case, Equipment Management will decide to have the vehicle transported to a County facility.

7. Isolation of County Vehicles - In addition to a criminal investigation conducted by law enforcement, Risk Management may elect to have a County owned vehicle involved in a serious accident isolated at a secured facility.

   a. Equipment Management's procedures for any vehicle in a secure storage status will be followed. Only those persons who are authorized by Risk Management or the County Attorney's Office will be given access to the vehicle.

   b. Vehicle testing or repairs of any kind are not permitted for a vehicle in isolation without approval from Risk Management.

   c. Risk Management must be contacted before any vehicle is released from isolation.

8. Personal Vehicles Used for County Business - Employees who drive their personal vehicles on County business must maintain the minimum liability insurance coverage required by their State of licensure. Mecklenburg County does not provide coverage for damage to personal vehicles used for County business. Employees must immediately notify their supervisor of any accident while operating their personal vehicle on County business. In addition to these requirements, employees are responsible for following the reporting requirements to their insurance carrier as outlined in their personal auto insurance policy. The department is responsible for submitting an accident report.

Operations Supervisors are responsible for conducting on-scene investigations of accidents and incidents. Depending on the severity and the nature of the event, various mechanisms will be used for preserving transient evidence. These may include digital photography, bus video, field sketches, interviews, and observations.

Investigation

An attempt is made to complete the investigation of most accidents within three days. Operations Supervisors are required to complete an Accident Report. Operators are required to complete an Accident/Incident Report. The Supervisor is required to file both reports and attach all relevant media for use by the Director of Operations and the CSO.

A Report of Injury Form must be completed if an employee suffers an injury or illness as a result of an accident or incident.

Accident Review Process

Accidents and Incidents are classified as Preventable or Non-Preventable.

Preventable accidents are defined as those accidents that could have been reasonably avoided if the operator had followed all defensive driving techniques as established by the Smith System Guidelines and/or Transit Operations Procedures and Policies.

After reviewing all related documents and evidence, the investigating Transportation Supervisor, CSO, Director of Operations makes an independent preliminary determination of whether the accident was preventable.

The final accident determination is made by the County Risk Administrator. This is done by analyzing the police report, maintenance reports, and a calculation of payout and risk to MTS. If necessary, and third party will be brought in to help aid in the decision.

Hazard Resolution
The primary purpose of the Accident Investigation process is to determine the cause(s) of accidents so that they may be prevented or mitigated in the future. To this end, it is crucial that all relevant departments be appropriately involved in the Process. A serious attempt is made to use lessons learned through the investigatory process to incorporate hazard resolutions into future procedures, designs, construction, modifications, training, and procurements.

Follow-up
Follow-up in the form of corrective actions is the responsibility of the employee's director. The responsibility may be delegated to the employee's manager, supervisor or CSO.

Any disciplinary action will be assessed using MTS of MTS Employee Handbook. Disciplinary consequences for accidents may include warnings, suspensions, and discharge.

Internal Reporting
The Director of Operations is responsible for ensuring that all accident reports are completed and filed with Human Resources, CSO. Human Resources will advise on the history of the employee if a pattern of safety events is evident.

Documentation
Transit Operations, Human Resources and CSO maintain the accident investigation documentation in both paper copies and TransWeb.

Performance Measures
Through a series of performance measures relative to operations, maintenance, and safety, MTS can monitor the system's safety by identifying trends and gaps in policies, procedures, training, and monitoring efforts. The following performance measures are on a daily, monthly, and quarterly basis.

Maintenance

♦ **Preventive Maintenance On-time Inspection Percentage** – determines the effectiveness of the maintenance department to ensure all inspections are conducted per manufacturing and County transit mileage intervals.

♦ **Vehicles Removed from Revenue Service** – tracks vehicles removed from service due to a mechanical defect developed while in service requiring immediate service either on-site of failure or once returned to the facility.

♦ **Annual Vehicle Condition Assessment** – through annual inspection, determines on a scale of 1-5 the overall condition of the asset. This performance measure is also used in annual updates of MTS's Transit Asset Management Plan.

Operations

♦ **Customer Complaints Per Month** – tracks all customer complaints to identify areas of deficiency with vehicle, driver or other County transit areas. Safety-related complaints are immediately routed to a supervisor on-duty or the CSO for investigation mitigation and response. Complaints may be a result of phone calls, website or County transit public forums.

♦ **On-time Performance** – serves as an indicator to issues with time management, environmental factors, scheduling, and vehicle and driver performance.

♦ **On-board Surveys** – conducted annually, allow MTS to receive rider feedback about bus operator performance, customer service, and vehicle safety.

Safety

♦ **Safety Performance Measure: Fatalities** (total number of reportable fatalities and rate per total vehicle revenue miles by mode)

♦ **Safety Performance Measure: Injuries** (total number of reportable injuries and rate per total vehicle revenue miles by mode)

♦ **Safety Performance Measure: Safety Events** (total number of reportable events and rate per total vehicle revenue miles by mode)

♦ **Safety Performance Measure: System Reliability** (mean distance between major mechanical failures by mode)

Section 7. Safety Promotion

Operator Selection

Hiring Practices

Selecting applicants best suited to excel at the Bus Operator job requirements is critical to safe transit operations. The transit Bus Operator is directly responsible for the safety of not only the passengers, but also the pedestrians, bicyclists, drivers, and all others who share the road with the transit vehicle. MTS's hiring process includes the following components:

Applications

Applicants are sought through postings in traditional and culturally diverse media, referrals from current employees posted on the MTS website and applications filed by prospective candidates when there are no positions available. The applications are screened by key personnel in Human Resources, Department of Social Services and Transit Operations.

Interview

After application reviews, applicants are then interviewed to evaluate a candidate's strengths in customer service, the ability to simultaneous perform tasks, conflict resolution, and the ability to perform well under temporal and interpersonal pressure.

Driving Record

To be eligible for hire, a candidate must submit an acceptable driving record dating back five years.

Licensing

To be eligible for hire, a candidate must be able to earn a CDL with a Passenger Endorsement

Criminal Background Check

To be eligible for hire, a candidate must submit to a Criminal Background Check administered by the North Carolina State Police with the Federal Bureau of Investigation. The results must meet all statutory and MTS standards for the Bus Operator position.

Drug Testing

To be eligible for hire, a candidate must produce a negative result for a pre-employment drug test.

Physical Capacities Testing

To be eligible for hire, a candidate must pass a position-specific physical capacities test.

Training

There are formal training programs for Bus Operators, Maintenance employees and Operations employees. These include training classes, manuals, Standard Operating Procedures, and on-the-job training.

Mecklenburg County Transportation System – Agency Safety Plan

The safety component of training is designed to make employees aware of the hazards associated with their jobs and the appropriate methods for controlling these hazards. The training is intended to motivate employees to work safely. Trainings fall into three main categories: (1) Initial, (2) Periodic, and (3) Remedial or Refresher.

Initial Bus Operator Training

New Bus Operators receive an intensive two-week training course that covers every aspect of their new job. Some components of the training are delivered in the classroom. The majority of learning occurs on the buses during off-route and on-route training. The training includes, but is not limited to, the following areas:

- Bloodborne Pathogens

- Passenger Assistance/ADA

- Customer Service

- Emergency Procedures

- Drug and Alcohol Policy

- MTS Orientation Curriculum and Policies

- Defensive Driving

- SMS Training

On-route training provides real service experience with an Operator Instructor on the new operator's regularly scheduled work. The time the new employee operates in revenue service is increased daily. Each day the student receives a full review and debriefing from his or her instructor. Instructors communicate among one another regarding where additional training for new operators is required.

After the initial training, new Bus Operators receive additional support and training, including:

- One week of riding with a veteran driver

- Random spot checks

- Quarterly safety meeting trainings

Annual Training for All Bus Operators

Every year, each Bus Operator receives one full day of refresher and topical training during the autumn months. The training addresses, but is not limited to, the following topics:

- Workplace Violence

- Passenger Assistance Safety and Sensitivity (PASS)

- Defensive Driving Course

- Bloodborne Pathogens

- Safety/Security Update

- Drug-Free Workplace

- Smith System

- ASP and SMS

Emergency Response Planning and Coordination

The Mecklenburg County Emergency Operations Plan includes roles and responsibilities relative to MTS's transit system. The AE or designee oversees the Transportation Service, and is responsible for providing vehicles and drivers from County resources for transporting personnel and materials required to meet the needs of the County, and for coordinating the utilization of all transportation resources made available to the County through the supporting agencies. Internal and external emergency Action plans my be activated depending on the event.

System Modification Design Review and Approval

General Process

The MTS bus system can be regularly modified in response to operational experience, the addition of new types of service, and changes in service design and levels. MTS's philosophy is to use appropriate new technologies to benefit the environment and the community it serves. The challenge is to review any proposed modification adequately before it is approved. Any proposed modification should be evaluated to ensure it is compatible with existing systems and does not introduce new hazards to the system or reduce the effectiveness of existing hazard controls.

Equipment modifications may be proposed by any employee of any department that uses the equipment. Changes may also occur from an analysis of reliability performance, historical data, and available improvements in equipment design and components.

Modification Design Review

A review of any modification in equipment design shall be made by the director and managers of the department responsible for the equipment. MTS's Department of Social Services is currently responsible for equipment adjustments in coordination with Mecklenburg County's Planning Department and Maintenance Department. It is an informal practice to include Human Resources and Operations in the review of any change that might affect safety. The impact on the safety of all designs and specifications should be identified and evaluated before the change is approved. Some of the areas to be considered include but are not limited to:

- Hazardous Materials (handling and use)

- Motor Vehicle Safety

- Human Factor

- Occupational Health and Safety

- Materials Compatibility

- Fire Protection

- Lighting

- Braking systems

- Mirrors

- Warning Devices

Modifications must not be made before it is determined how they might affect the safety of the system, or any other systems. Other departments may evaluate a proposed change to determine its compatibility with other systems (e.g., hoists, fueling systems, communications systems). The evaluation may also include a review of applicable regulations, such as the Federal Motor Vehicle Safety Standards and Regulations and the U.S. Department of Labor's Occupational Safety and Health Act.

Testing may also be performed to evaluate the safety of a proposed modification. The testing of small changes may be minimal. For substantial modifications, extensive field testing, mock-ups, and structural evaluations may be employed. Examples of modifications include pickup location changes, scheduling software updates, vehicle configurations and policy changes.

Modification Design Approval

Final approval is generally made by either the MTS's AE, or CSO. When modifications are made by a bus manufacturer, the Fleet Superintendent works with the manufacturer, and contractual changes may be made. If changes are substantial, additional training will be provided for maintenance and operation staff.

Monitoring

Once a modification is put in place, feedback from the operating department is solicited to evaluate the performance of the modification. Unsolicited input from the operating department and its employees (end users) is also encouraged. Depending on the nature of the modification, Maintenance, and the Safety Review Committee may be involved for input.

Documentation

The Maintenance Department is responsible for documenting any vehicle modifications. Facilities Services is responsible for documenting any modifications made to a facility. Documentation may involve changing diagrams, schematics, manuals, service bulletins, service intervals, standard operating procedures, and Safety Data Sheets (SDS). Maintenance Supervisors are responsible for updating SDS based on input from product manufacturers.

Section 8. Definitions of Terms Used in the Safety Plan

MTS incorporates all of FTA's definitions that are in 49 CFR § 673.5 of the Public Transportation Agency Safety Plan regulation.

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

• **Event** means any Accident, Incident, or Occurrence.

• **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.

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

• **Occurrence** means an Event 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.

• **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 FTA.

• **Public Transportation Agency Safety Plan (or Agency Safety Plan)** means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.

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

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

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

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

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

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

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

• **Serious injury** means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date 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.

• **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.

Section 9. Commonly Used Acronyms

Acronym	Word or Phrase
ADA	Americans with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as a ASP in Part 673)
CFR	Code of Federal Regulations
CT	County Transit
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
NCDOT	North Carolina Department of Transportation
MPO	Metropolitan Planning Organization
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
U.S.C.	United States Code
VRM	Vehicle Revenue Miles

Section 10. Additional Information

This ASP was developed from information in other MTS documents, policies and procedures and manuals. Those documents are listed below:

- MTS Transit Service Evaluation Form
- MTS Maintenance Plan
- MTS Loss Control Manual
- MTS Accident Report
- MTS Accident and Incident Policy

Appendix

Mecklenburg County Transportation System

SERVICE EVALUATION FORM
Date ____/_____/_____

The following service was evaluated: ☐Fixed Route #/Vehicle # _____
☐Paratransit Manifest/Vehicle # _____
☐Passenger Pickup Location _____
☐Facility _____

Elements of Evaluation:

<u>Location</u>

☐Road hazard   _____

☐Passenger access hazard   _____

☐Construction zone   _____

☐Passenger Issue   _____

☐Traffic Hazard   _____

☐Facility Hazard   _____

☐Safety Issue   _____

☐Security Issue   _____

☐Timing   _____

☐Other   _____

Provide details below of hazard: CSO Initial's _____

	Assessment Level
	☐High Priority
	☐Medium Priority
	☐Low Priority

Hazard Response Action Taken: Date of Response: _____

Follow-Up   Date: _____

What is the likelihood of this hazard happening again?   ☐High   ☐Medium   ☐Low

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INCIDENT REPORTING FORM

Reporting Employee				Report #	
Date of Report					
Time of Incident				Time Report Submitted	
Location of Incident				Route/Manifest	
Supervisor Notified					

(Check all that apply)

Type of Incident

Vehicle		Weather Related		
Passenger		Road Condition		
Facility		Security		
Employee		Near Miss		

Description of Incident

Initial Action Taken to Mitigate Incident

Initial Assessment of Incident

	Level 1 - Immediate: A deficiency, threat, or hazard requiring immediate attention to mitigate risk either temporarily until further action can be taken or complete mitigation.
	Level 2 - Short Term: Action is needed within seven days to mitigate an identified deficiency, threat, or hazard. The deficiency, threat, or hazard does not pose immediate danger, but if no action is taken could elevate to an Immediate level risk.
	Level 3 - Long Term: A deficiency, threat or hazard has been identified but does not pose a threat currently, but could at a later time. Continued monitoring and awareness are required.

Likeliness of re-occurance of this incident (1-10) | |

Received by: _____   Date/Time _____/_____

Mecklenburg County Transportation System – Agency Safety Plan

INCIDENT MITIGATION							
Investigating Supervisor				Title			
Date of Investigation				Time			
Additional Information							
Assessment Classification (Circle)			Level 1	Level 2	Level 3		
					Report #		
Mitigation Action(s) Taken							
Action(s) Designed to:		Eliminate		Control		(Circle one)	
Describe Communication of Action(s)							
Follow-up							
Date			Contact				
Status of Action Taken							
Is additional action needed?			YES		NO		
Additional Action Taken							

Mecklenburg County Transportation System – Agency Safety Plan

INCIDENT CLASSIFICATION						
				Report #		
Category of Incident						
Vehicle			**Passenger**			
Mechanical			Behavior			
Performance			Weapon			
Interior			Suspended fron svc.			
Exterior			Medical Emergency			
Towed			Injury			
Repaired on scene			Death			
Safety equipment			Mobility Devise			
Lift/Ramp/Securemt						
See Pre-Trip						
Facility			**Facility**			
Safety Equipment			Shelter			
Security Systems			Fueling			
Plumbing			Hazardous Materials			
Electrical			Fencing/Gate			
Foundation			Passenger Amenities			
Parking						
Equipment			**Employee**			
HVAC/Heat			Behavior			
Roof			Theft			
Storage			Endangering Others			
Computer/Data			Property Abuse			
Farebox/Vault			Illegal Activity			
			Chief Safety Officer Initials			

Mecklenburg County Transportation System – Agency Safety Plan

My Ride Safety Risk Assessment Register						
Identification						
Hazard	Hazard Type	Identification Date	Identification Source	Analysis Date	Worst Possible, Worst Credible, or Most Common Potential Consequence(s)	Existing Mitigation(s)

Initial Safety Risk Rating			Further Mitigation Action	Revised Safety Risk Index	
Severity of Consequences	Likelihood of Consequences	Safety Risk Index	Further Mitigation Action	Revised Safety Risk Index	Revised Safety Risk Index Date

Mitigation Owner and Implementation Date		
Department Responsible for Mitigation	Estimated Implementation Date	Contact Person