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To: Metropolitan Planning Organization Date: November 17, 2023

From: Keith Boatman, Director of Capital Projects and Planning

Re: SCTA Public Transportation Agency Safety Plan updates

The SCTA Safety Committee has made the following updates to the Safety Plan:

- Pg. 8 Update date and tables to reflect changing from CY to FY numbers.
 - Pg. 9 Remove wording regarding COVID.
 - Pg. 9 Update wording in relation to submitting the Safety Plan to the MPO instead of stating the MPO must “Approve” the Safety Plan.
 - Pg. 10 Update Table B – Safety Performance Targets FY 2024.
 - 5.4.3 Update position description from Safety Supervisor to Operations Supervisor.
Update position description from Facilities Manger to Facility Tech.
 - 5.4.4 Add Chief Safety Officer and Director of Shared Ride.
 - 6.4 Include the approved Infectious Disease Exposure verbiage as required by FTA
 - Pg. 25 Accident and Incident Review Board – change four to five and add Director of Shared Ride.
- Updated Appendix adding: Service Improvement Suggestions Form, Near Miss Form, SAFTI Standards.

If you have any questions prior to the meeting, please feel free to contact Keith Boatman, Director of Capital Projects and Planning at SCTA (kboatman@sctapa.com; 717-947-7286).

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Public Transportation Agency Safety Plan

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Introduction

The safety of passengers and employees is a top priority for the South Central Transit Authority (SCTA) and all of its stakeholders. Utilizing the principles of Safety Management System (SMS) allows SCTA to examine how organizational factors contribute to incidents, accidents, and near misses. SMS proactively identifies and analyzes contributing organizational factors before the fact, before accidents and incidents bring them to light. Organizational factors include how the Authority allocates its resources; defines and establishes operational procedures; supervise frontline personnel; selects and trains staff; monitors service delivery operations; and resolves human performance issues.

Successful management of these organizational factors requires SCTA to make wise decisions about how they identify, prioritize, and address safety concerns. SMS builds on this experience by integrating basic system safety principles into specific organizational and management processes through:

- Increasing the focus on hazard identification across the organization;
- Broadening the scope of safety data collection;
- Emphasizing the importance of managing safety risks across all areas of operations;
- Integrating data from other organizational processes into safety data analysis;
- Promoting participation and contribution of frontline personnel in the management of safety; and
- Fostering an organizational culture that encourages proactive safety reporting and safety risk management.

SMS activities proactively detect safety concerns and organizational factors and correct them using data-driven prioritization. As such, it is important for SCTA to be successful it must effectively collect, analyze, and share safety data and perform active, accurate and routine safety performance measurement.

SMS is a formal top-down, data driven, organization-wide approach to managing safety risks and assuring the effectiveness of safety risk mitigations. To be successful, SCTA ensures that senior management has access to the information necessary to strategically allocate resources based on the unique safety priorities of the Authority. SMS requires that accountability reside with the top executive of SCTA.

Definitions

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; an evacuation for life safety reasons.

Accountable Executive means the single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of the 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.

Agency or Transit Agency means South Central Transit Authority (SCTA), Berks Area Regional Transportation Authority (BARTA) and Red Rose Transit Authority (RRTA).

BARTA means the Berks Area Regional Transportation Authority.

Board of Directors means governing body of the South Central Transit Authority (SCTA).

Chief Safety Officer means the adequately trained individual who has responsibility for safety and reports directly to the Transit Agency's chief executive officer.

CFR means Code of Federal Regulations.

Event means any Accident, Incident, or Occurrence as defined by FTA in the Safety Reporting System in the National Transit Database.

FTA means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

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

MCSAP means Motor Carrier Safety Assistance Program.

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 the Transit Agency.

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

Part 673 means 49 CFR (Code of Federal Regulations) Part 673.

PennDOT means the Pennsylvania Department of Transportation.

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

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

Public Transportation Agency Safety Plan means this document, which is the documented comprehensive Agency safety plan for a Transit Agency that is required by 49 U.S.C. 5329.

PUC means Pennsylvania Public Utility Commission.

RRTA means the Red Rose Transit Authority.

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

Safety Management System (SMS) Executive means a Chief Safety Officer or equivalent.

Safety performance target (SPT) 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 (SRA) means the formal activity whereby the Transit Agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

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

Serious injury means any injury which: (1) requires hospitalization for more than 48 hours, commencing within seven days from the date 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 five percent of the body surface.

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

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.

U.S.C. means United States Code.

Section 1 Transit Agency Information

SCTA is a municipal authority formed by Berks and Lancaster Counties, in December, 2014 under the Municipal Authorities Act of 1945, to operate fixed route and demand response service in both Berks and Lancaster Counties, Pennsylvania with its headquarters located at 45 Erick Road, Lancaster, PA. The Authority was formed as a cost savings measure to consolidate the management of the Berks Area Transportation Authority (BARTA) in Reading, Pennsylvania and the Red Rose Transit Authority (RRTA) in Lancaster, Pennsylvania with SCTA being designated as the recipient for all federal and state funds for the Reading and Lancaster urbanized areas. SCTA is a recipient of Section 5307 and 5339 funds from the Federal Transit Administration (FTA) on an annual basis. SCTA does not provide transportation services on behalf of any other entity. As such, SCTA is the responsible Authority for all compliance for federal and state regulations, including the development of this Safety Plan in coordination with union representation. The Authority operates under a management agreement with BARTA and RRTA to provide administrative and supervision of services being operated at both locations. The operators and mechanics are employed respectively by BARTA or RRTA with all management employees employed by SCTA. BARTA and RRTA own all facilities and lease them to SCTA to maintain and operate. This is important since SCTA is responsible for the capital improvements needed to purchase new revenue and non-revenue vehicles and to make improvements to facilities. SCTA does purchase transportation services from Easton Coach Company (ECC) that provides all the paratransit service in Lancaster and about 20% of the service in Berks counties.

With this in mind, SCTA is responsible for developing the TAM Plan and developing the annual Transportation Improvement Program (TIP) in support of this Plan. Therefore, the Safety Plan, by SCTA has been developed to be applicable to both urbanized areas and all references in the plan apply to both urbanized areas and to SCTA, BARTA, RRTA and its contracted service with ECC.

Subsection 1.1 Accountable Executive

SCTA's Accountable Executive is the Executive Director. The Executive Director is the single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan, 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.

The Executive Director is accountable for ensuring that the Agency's Safety Management Systems (SMS) are effectively implemented throughout the Agency's public transportation system. The Executive Director is accountable for ensuring action is taken, as necessary, to address substandard performance in the Agency's SMS. The Executive Director may delegate specific responsibilities, but the ultimate accountability for the Transit Agency's safety performance cannot be delegated and always rests with the Executive Director.

Subsection 1.2 Chief Safety Officer

The Executive Director designates the SCTA Director of Administration and Human Resources as SCTA's Chief Safety Officer who has the authority and responsibility for day-to-day implementation and operation of the Agency's SMS. The Chief Safety Officer must hold a direct line of reporting to the Accountable Executive and meet the requirements of Section 673.5 and Section 673.23 (d)(2) of the FTA Safety Regulations.

The Chief Safety Officer must be adequately trained and has responsibility for safety and reports directly to the Agency's chief executive officer. For SMS to be successful and effective, the Chief Safety Officer must have a strong working relationship with the operations and asset management functions at SCTA.

Section 2 Plan Development, Approval, and Updates

Subsection 2.1 Drafting the Plan

Pursuant to 49 CFR Part 673.11, SCTA drafts and certifies this Public Transportation Agency Safety Plan. FTA will oversee compliance with the requirements of Part 673 through the existing Triennial Review processes.

Subsection 2.2 Signature by the Accountable Executive and Approval by the Board

Pursuant to 49 CFR Part 673.11 (a)(1), this Public Transportation Agency Safety Plan and subsequent updates must be signed by the Accountable Executive and approved by SCTA's Board of Directors. Documentation of Board approval is found in Appendix A.

Subsection 2.3 Certification of Compliance

Pursuant to 49 CFR Parts 673.13(a) and 673.13(b), SCTA shall certify that it has established this Public Transportation Agency Safety Plan, meeting the requirements of 49 CFR Part 673 one year after the effective date of the final rule. Each June, SCTA will certify its compliance with 49 CFR Part 673. FTA does not require this plan to be submitted to FTA on a regular basis. Instead, SCTA will certify that it has established this Safety Plan, which fulfills the requirements under Part 673, and attach such certification to this Public Transportation Agency Safety Plan. FTA annually amends and issues the list of Certifications and Assurances. SCTA will review such guidance for incorporation into the safety program as necessary. A copy of the Certification of Compliance is included in Appendix B.

Subsection 2.4 Plan Review and Updates

SCTA must update its Safety Plan at any point when information, processes or activities change within the Agency and/or when Part 673 undergoes significant changes, or annually, whichever comes sooner. As SCTA collects data through its Safety Risk Management and Safety Assurance processes, the Agency will evaluate its safety performance targets (SPTs) to determine whether they need to be changed, as well.

Specifically, SCTA will review its Safety Plan when it:

- Determines its 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 SMS;
- Significantly changes its organizational structure, and/or;
- In August each year, SCTA will update this plan.

SCTA plans in incorporating the annual review into its existing process for evaluating fixed-route and paratransit services. This process begins in February each year with the solicitation of input from all employees for concerns or suggestions for changing services, improving customer service, safety concerns, identifying areas of concern; such as on-time performance, the location of bus stops and

providing timely communications to the public. SCTA will form a review committee at both locations comprised of operators, maintenance, planning, marketing, and management staff that reviews all the feedback received. The Review Committee will then comprise a list of recommendations in March that will be presented to the Board of Directors, including a cost analysis of the recommended changes.

Depending on the magnitude of the changes and in accordance with SCTA's Title VI Plan, a public hearing will be scheduled on the proposed changes. SCTA also prepares a special brochure/notice on electronic boards for customers at the transit centers and/or placed on buses describing the proposed changes along with the date for the public hearing. This would include any recommended safety related changes to the services. The public hearing would be held in April and then the final recommendations would be presented to the Board of Directors at the April Board meeting for approval. SCTA then prepares a follow-up brochure/notice on the electronic boards, detailing all the approved changes.

As a result of these approved changes, the performance targets related to the safety plan are developed and the Plan updated for final approval at the September Board meeting. The recommended performance targets are then forwarded to the MPO's for adoption at their September meetings depending on their respective meeting schedules. The approved performance targets are then distributed to all employees after Board and MPO approval, generally by the end of September.

In the event that changes are needed to the Safety Plan outside the normal timeline, SCTA Safety Plan Committee, comprising of half management and half ATU labor union representatives, will develop the recommended changes for Board approval. Such changes may include addressing changes in the federal regulations, a significant change in services, particularly reductions in service, catastrophic events that effect services and or facilities. Such changes can occur rather quickly and would include the input from the Safety Committee and approval by the Board that meets monthly.

Section 3 Safety Performance Targets (SPTs)

Subsection 3.1 Target Development

SCTA includes SPTs in this Safety Plan. These targets are specific numerical targets and are based on the safety Performance Measures established by FTA in the National Public Transportation Safety Plan. In the most recent version, the 2017 NSP3, FTA adopted four initial safety Performance Measures: (1) Fatalities, (2) Injuries, (3) Safety Events, and (4) System Reliability.

FTA requires SCTA to coordinate with PennDOT and the Metropolitan Planning Organization (MPO) to the maximum extent practicable. Pursuant to 49 CFR Part 673.15(a), SCTA will transmit safety performance targets available to PennDOT and Metropolitan Planning Organizations to aid in the planning process upon certification of this plan. Additionally, SCTA will transmit performance data against the safety performance targets to PennDOT and the Metropolitan Planning Organization on an annual basis.

The development of the Performance Targets is based on operating data routinely collected by SCTA for the performance of services provided by RRTA and BARTA, for both fixed-route and paratransit service using reporting systems already in place. This includes the monthly reporting of accidents that include data SCTA reported in the NTD for safety occurrences, either major or minor, on the number of injuries and a determination on the preventability of the accident. These monthly reports also include data on non-preventable accidents as well as "incidents" where a safety concern or event occurred. A copy of the

monthly safety report for RRTA and BARTA is included in Appendix C. The Manager of Safety and Training is responsible for preparing the monthly safety report at each location.

In terms of measuring the reliability of the services, data is collected on roadcalls on a daily basis and summarized each month that includes major and minor roadcalls in accordance with the definitions for reporting in the National Transit Database (NTD). The Operations Departments at each location are responsible for recording each roadcall on their daily reports that are reviewed by the Director of Maintenance to record the cause and classification of each roadcall. The Directors of Maintenance at each location are tasked with preparing a monthly performance report on roadcalls and fuel usage for the vehicle fleets. For RRTA, the report is only for fixed route service, but for BARTA, the report includes fixed-route and paratransit service performance. The paratransit service in Lancaster is performed by a private operator, Easton Coach that provides monthly reports too on the number of roadcalls and whether the roadcall is a major or minor. Copies of the SCTA monthly maintenance performance reports are included in Appendix E.

In determining the targets for the performance measures, SCTA maintains a set of data on performance trends for accident data and roadcall data which is reported on a per vehicle revenue mile (VRM) basis. As shown in Table A, the trend by service type is shown, and in the case of roadcalls, SCTA benchmarks against the national averages as shown in the NTD Summary Reports. Accident related data that shows injuries and fatality rates is also benchmarked against national data derived from the NTD Summary Reports. The most recent NTD Summary Report available was for years 2012-2021 and was published in November, 2022.

TABLE A - FIXED-ROUTE BUS SERVICE TRENDS- BARTA AND RRTA COMBINED SE/BARTA ONLY INJURIES

Fiscal Year	Vehicle Revenue Miles (VRM)	Fatalities (total)	Fatalities (per 1 million VRM)	Injuries (total)	Injuries (per 1 million VRM)	Safety Events (total)	Safety Events (per 1 million VRM)	System Reliability (VRM / Failures)
16 - 17	3,056,666	0	0.00	4	1.31	11	3.60	203,778
17 - 18	3,124,119	0	0.00	10	3.20	17	5.44	115,708
18 - 19	3,138,121	0	0.00	9	2.87	14	4.46	136,440
19 - 20	3,061,992	0	0.00	14	4.57	7	2.29	145,809
20 - 21	3,152,462	0	0.00	5	1.59	5	1.59	315,246
21 - 22	3,261,988	0	0.00	8	2.45	11	3.37	171,684
22 - 23	3,248,209	0	0.00	11	3.39	10	3.08	154,677

TABLE A - DEMAND RESPONSIVE (DR/DO) SERVICE TRENDS

Fiscal Year	Vehicle Revenue Miles (VRM)	Fatalities (total)	Fatalities (per 1 million VRM)	Injuries (total)	Injuries (per 1 million VRM)	Safety Events (total)	Safety Events (per 1 million VRM)	System Reliability (VRM / Failures)
16 - 17	743,545	0	0.00	1	1.34	2	2.69	247,848
17 - 18	709,640	0	0.00	1	1.41	7	9.86	88,705
18 - 19	728,288	0	0.00	0	0.00	10	13.73	72,829
19 - 20	607,158	0	0.00	2	3.29	2	3.29	151,790
20 - 21	548,688	0	0.00	0	0.00	5	9.11	109,738
21 - 22	551,064	0	0.00	1	1.81	3	5.44	137,766
22 - 23	553,402	0	0.00	1	1.81	1	1.81	276,701

TABLE A - DEMAND RESPONSIVE (DR/PT) SERVICE TRENDS/READING AND LANCASTER COMBINED

Fiscal Year	Vehicle Revenue Miles (VRM)	Fatalities (total)	Fatalities (per 1 million VRM)	Injuries (total)	Injuries (per 1 million VRM)	Safety Events (total)	Safety Events (per 1 million VRM)	System Reliability (VRM / Failures)
16 - 17	2,358,503	0	0.00	0	0.00	4	1.70	589,626
17 - 18	2,372,086	0	0.00	1	0.42	6	2.53	338,869
18 - 19	2,402,855	1	0.42	3	1.25	5	2.08	266,984
19 - 20	1,928,371	0	0.00	1	0.52	4	2.07	385,674
20 - 21	1,328,015	0	0.00	0	0.00	3	2.26	442,672
21 - 22	1,615,347	0	0.00	1	0.62	3	1.86	403,837
22 - 23	1,711,838	0	0.00	1	0.58	3	1.75	427,960

It should be noted that SCTA did experience one fatality on its contracted demand responsive service in 2019. This fatality was the result of an elderly passenger trying to board the van without the assistance of the driver and lost their balance and fell backwards hitting their head on the pavement. The passenger was hospitalized and passed away a few days later.

The performance targets based on the actual experience and data for SCTA are shown in Table B. These targets will be evaluated throughout the year and new targets will be developed next year as noted in the plan. It should be noted that the goals for FY 2024 have decreased in comparison to CY 2023 due to the recalculation of the trend tables from calendar year to fiscal year.

Since SCTA provides service in two urbanized areas, namely, Lancaster and Reading, a copy of the original Safety Plan and Performance Targets are submitted to the MPO's in both areas.

The SCTA Safety Committee recommended for approval the Updated Plan and Performance Targets for the December Board Meeting. Simultaneously, SCTA submitted the updated Plan and Targets to the respective MPO’s for their January 2024 meetings respectively.

TABLE B - SAFETY PERFORMANCE TARGETS FOR SCTA – FY 2024

Mode	Fatalities (total)	Fatalities (per 1 million VRM)	Injuries (total)	Injuries (per 1 million VRM)	Safety Events (total)	Safety Events (per 1 million VRM)	System Reliability (VRM / Failures)
Fixed Route Bus MB/DO	0	0.00	15.0	5.0	12.0	4.0	165,000
Demand Response DR/DO	0	0.00	3.0	3.0	3.0	2.5	279,000
Demand Response DR/PT	0	0.00	3.0	3.0	5.0	2.5	429,000

Section 4 Overview of the Agency’s Safety Management Systems (SMS)

SMS are a comprehensive, collaborative approach to bring all employees together to build on the transit industry’s existing safety foundation to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully. SCTA’s SMS focus upon applying resources to risk and is based on ensuring that SCTA has the organizational infrastructure to support decision-making at all levels regarding the assignment of resources. Some key parts of SMS include:

- Defined roles and responsibilities;
- Strong executive safety leadership;
- Formal safety accountabilities and communication;
- Effective policies and procedures; and
- Active employee involvement

Furthermore, SCTA’s SMS has four distinct components, which are discussed in subsequent sections to this Safety Plan:

- Safety Policy
- Safety Risk Management
- Safety Assurance
- Safety Promotion

Section 5 Safety Management Policy

The first component of SCTA’s SMS is the Safety Policy, which is the foundation of the SCTA’s safety management system. It clearly states the organization’s safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. The Safety Policy

clearly defines management and employee responsibilities for safety throughout the organization. It also ensures the Safety Committee is actively engaged in the oversight of the system's safety performance by requiring regular review of the safety policy, budget and program by the designated Accountable Executive.

Subsection 5.1 Safety Management Policy Statement

The management of safety is one of SCTA's core business functions. SCTA is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all the transit service delivery activities take place under a balanced allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting established standards. The overall objective of SCTA is to provide safe service to the public and its employees and reduce the number of safety related incidents and/or accidents. This objective applies to not only the services provided directly by SCTA, but also the service provided by its private operator for paratransit services.

All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the Executive Director of SCTA.

SCTA's commitment for its directly operated and contract service 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 of other management systems of SCTA;
- *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 SCTA's 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 SCTA's operations or activities to a point which is consistent;
- *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 a reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;
- *Comply with, and whenever possible, exceed, legislative and regulatory requirements and standards;
- *Ensure that sufficient skilled and trained human resources are available to implement the safety management process;
- *Ensure that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated on tasks commensurate with their skills;
- *Establish and measure SCTA safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and

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

Subsection 5.2 Safety Management Policy Communication

The safety management policy will be communicated throughout the Agency, to all employees, including managers, executives, contractors, and to the Board. SCTA will post the adopted policy throughout the Authority's facilities and distribute to every employee. The responsibility for communicating the Safety Management Policy rests with SCTA's Accountable Executive and the Chief Safety Officer at the Authority as previously described. The Safety Plan is distributed to every employee managed by SCTA in hard copy after adoption by the Board of Directors. At the December board meeting the approval of the annual Performance Targets will be approved also. A copy is then forwarded to the private operator, Easton Coach Company (ECC), to post at their facilities and review with their employees.

SCTA also regularly posts Safety Measures on the bulletin boards and electronic message boards located in the employee's lunch rooms and throughout the respective transit centers. The electronic message boards have become invaluable for keeping up to date information, particularly during the COVID-19 pandemic and reminders on policy and protocol. The Executive Director, working closely with the Marketing Manager have crafted electronic messages to keep safety in the forefront for the employees and customers. Further, SCTA monthly posts the results from the Safety Review Committee of the number of incidents and accidents, plus the preventability determination of each accident. The reports are posted in the employee lunch rooms at each location.

Subsection 5.3 Employee Safety Reporting Program

A requirement of the Safety Plan is to establish and implement a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action. SCTA has developed an Employee Reporting System (ERS) within the SMS framework that hazard elimination (or mitigation) is a priority for the Authority and that the implementation of the ERS represents the Authority's commitment to the safety of all employees and passengers.

For the ERS to be successful, the process for reporting a safety related concern must be easy and accessible with well-defined procedures for collecting, investigating, and correcting reported hazards. SCTA has informally always provided the opportunity to report potential hazards through its existing route and schedule change process that solicits potential changes from all employees in several categories from bus operating times, policies, facilities, and new services through the use of a standard form distributed to all employees, see Appendix D. All suggestions received are reviewed by a group of employees that include management, operators, and support staff that make recommendations for potential changes to the services. While safety was not specifically noted on the form, many of the suggestions for changes have a safety nexus such as, moving bus stops to a safer location, adding running time to schedules to reduce lateness, operating speeds, and changes to vehicles, such as location of mirrors. These forms are permitted to be submitted anonymously or the employee may include contact information for a follow up by staff. To improve upon this, SCTA will make these forms available to all employees all the time rather than just surrounding the annual route and schedule process and the form will be modified to specifically include potential safety hazards.

As part of the update to the existing form, SCTA will include a section for the reporting of what is referred to as a "Close Call or Near Miss". This would include the following potential safety hazards:

- An incident that had the potential to result in serious injury or death.
- A potential safety incident that occurred due to an operator error.
- A rule violation or other abnormal operating event that did not result in an accident.
- A safety hazard that could have resulted in an accident.
- A near miss event that could lead to an unsafe operating environment.

The reporting of such events could lead to the identification and correction of potential hazard conditions that may exist throughout the Authority and the ability to correct before a real accident occurs where injuries or death may occur. The collection and analysis of such data may also lead to areas of training shortfalls or additions that would improve the overall safety of services provided.

Procedurally, all completed forms will be reviewed and evaluated by the CSO of SCTA to determine the urgency and severity for the potential hazard. SCTA will continue to allow reports to be submitted anonymously and/or confidentially if so desired by the employee. SCTA will post notices at all facilities for employees to be aware of the process for reporting potential hazards and identify the senior management staff that should receive and review the reports. The CSO will be responsible for providing feedback to reporters, from the initial receipt of the reports through the process, and once the hazard has been corrected, if required. The employee notification will outline the procedure to allow reporters the opportunity to challenge or appeal the outcome of the investigation or corrective action taken. Each reporter will be assured that they can remain anonymous and SCTA will protect against any potential retaliations, intimidation or discrimination of the reporter.

SCTA also extends the requirements of its Safety Plan to the private operator, ECC that provides paratransit services in Lancaster and partly in the Reading area as a supplement to services being provided by SCTA. A new five year contract was awarded at the beginning of FY 2022 to the existing carrier, Easton Coach Company (ECC) and one of the areas of emphasis in their response to the RFP was a detailed description of their safety program as shown in Appendix H. As shown in their program, the concept of SMS is apparent and followed by the management of ECC, including the ability of employees to report safety related issues in a non-punitive manner. A copy of SCTA's Safety Program is distributed to ECC to review and adopt as part of their contract.

As part of the ongoing effort to enhance safety, ECC and SCTA communicate on a daily basis on any service issues, particularly as it involves the safety of customers or the service. This includes potential issues with transporting individual clients, such as accessible pathways at the residence or destination. In some cases, SCTA will contact the destinations, such as doctor's offices or medical center to resolve service related issues to ensure the safety of all parties concerned. ECC has been very good at relaying such issues to SCTA in order to resolve quickly, rather than waiting for a formal meeting to discuss.

In developing this process of the ERS for potential hazards, it is the desire of SCTA to create:

- A reporting culture that encourages the reporting of hazards without fear of retribution.
- An informed culture that uses the collection and analysis of leading indicators of safety performance metrics to base all decision making.
- A learning culture that uses the results of informed decision making to improve policies and procedures and details all necessary changes through employee training.
- A just culture in which employees are not punished for unintentional errors, but are held accountable for deliberate or reckless actions.

It is important to note that non-punitive reporting does not mean all behavior is acceptable as long as it is reported and actual rules must be followed.

Subsection 5.4 SMS Authorities, Accountabilities, and Responsibilities

Pursuant to 49 CFR Part 673.23(d), SCTA must establish the necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following individuals within its organization, as they relate to the development and management of the Transit Agency's Safety Management System (SMS). SCTA must establish the authorities, accountabilities, and responsibilities necessary for the development and management of its SMS. The level of detail in this section of the Safety Plan reflects the size and complexity of the SCTA's operations. At a minimum, SCTA must identify the authorities, accountabilities, and responsibilities of the Accountable Executive, Chief Safety Officer, Agency leadership, executive management, and key staff who play a substantial role in safety management.

Subsection 5.4.1 Accountable Executive

SCTA's Accountable Executive is the Executive Director. The Executive Director meets all the requirements of Section 673.5 and Section 673.23(d)(1) of the FTA regulations and is accountable for ensuring that SCTA's SMS is effectively implemented throughout the Authority's public transportation system. The Executive Director is accountable for ensuring action is taken, as necessary, to address substandard performance in the SCTA's SMS. The Executive Director may delegate specific responsibilities, but the ultimate accountability for the SCTA's safety performance cannot be delegated and always rests with the Executive Director. The Executive Director is accountable for ensuring that SCTA's SMS is effectively implemented and that action is taken, as necessary, to address substandard performance in the Authority's SMS. The Accountable Executive may delegate specific responsibilities, but not accountability for the Authority's safety performance. The authorities, accountabilities, and responsibilities assigned to the Executive Director in the Safety Plan must reflect these requirements.

The Executive Director roles include, but are not necessarily limited to:

- Controlling or directing the human and capital resources needed to develop and maintain the Safety Plan and the TAM Plan.
- Decision-making about resources (e.g. people and funds) to support asset management, SMS activities, and capital investments;
- Signing SMS implementation planning documents;
- Endorsing SMS implementation team membership; and
- Other duties as assigned/necessary.

Subsection 5.4.2 Chief Safety Officer

The Chief Safety Officer at SCTA has been designated to be the Director of Administration and Human Resources, who has the authority and responsibility for day-to-day implementation and operation of the SCTA's SMS and meets the requirements of Section 673.5 and Section 673.23(d)(2) of the FTA regulations. The authorities, accountabilities, and responsibilities assigned to the Chief Safety Officer or SMS Executive in the Safety Plan must reflect this requirement.

Chief Safety Officer's Roles include:

- Decision-making about resources (e.g. people and funds) to support asset management, SMS activities, and capital investments;
- Directing hazard identification and safety risk assessment;
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and Board on SMS implementation progress;
- Planning safety management training; and
- Other duties as assigned/necessary.

Subsection 5.4.3 Agency Leadership and Executive Management

Pursuant to 49 CFR Part 673.23(d)(3), SCTA must identify those members of its leadership or executive management, other than the Accountable Executive and Chief Safety Officer, who have authorities or responsibilities for day-to-day implementation and operation of the Authority's SMS. Other members of SCTA's leadership or executive management likely have authorities and responsibilities for day-to-day implementation and operation of the Authority's SMS. These authorities, accountabilities, and responsibilities must be described in the Safety Plan. However, the following principles apply to all:

- Ensure accountability for SMS performance is at the highest level of the Authority;
- Implement SMS in a manner that meets SCTA's safety performance objectives;
- Establish the meeting or committee structure necessary to ensure that safety information moves up, down and across the Authority;
- Effectively communicate SMS roles and responsibilities to all relevant employees; and
- Ensure SMS policies and procedures have been communicated to all Authority employees.

For SCTA, it starts with the Accountable Executive, Chief Safety Officer, the Directors of Operations for RRTA and BARTA, the Director of Shared Ride Services that includes contracted services, RRTA and BARTA, the Directors of Maintenance for RRTA and BARTA, the Director of Facilities and IT, and the Managers of Safety and Training, plus the Operations Supervisors will all be directly responsible for the day-to-day implementation and operation of the Authority's Safety Plan.

The Directors of Operations at the Lancaster (RRTA) and Reading (BARTA) facilities will be responsible for monitoring the daily operations of the bus service. Both of these positions are responsible for responding to accidents along with Managers of Safety & Training, plus the Operations Supervisors at each location. They are also responsible for conducting reviews of operator performance and handling passenger issues as needed. The Manager of Safety & Training is responsible for compiling and producing the monthly safety reports on accidents/incidents for both locations for all services, fixed-route and shared ride. The Director of Shared Ride is responsible for the daily monitoring of paratransit services at both locations that include directly operated service in Reading and contracted service in Lancaster and partially in Reading. It should be noted that all telephone calls for shared ride service are handled by SCTA staff, including trips made by the private operator. This ensures that SCTA receives first-hand knowledge of any service related issues. The requirements in the contract with the private operator detail the reporting requirements, especially related to safety issues, and include the potential for fines for failure to comply.

The Directors of Maintenance are responsible for all routine maintenance and safety related issues concerning vehicles that include the fixed route buses and paratransit vans. The Directors follow the

schedule as included in SCTA TAM Plan. For the contracted paratransit service, the Directors monitor the maintenance of the paratransit vehicles that are leased to the private operator, including on-site inspections. Lancaster has a fleet of 43 buses and 72 paratransit vans while Reading has a fleet of 54 buses and 60 paratransit vans. This includes the paratransit vehicles that are leased to the private operator. The Maintenance and Operations Departments work closely together on vehicle related issues, especially in terms of safety related issues. All vehicles in both fleets are equipped with camera systems that are very useful in investigating accidents and or potential near miss/close call incidents.

The Director of Facilities & IT is directly responsible for the routine maintenance of all of SCTA's facilities at both locations. This includes the routine inspection of the facilities in accordance with SCTA's TAM Plan. The Director is supported by the Facilities Technician for routine maintenance items such as replacing lights, repairing doors, overseeing contracted cleaning of the facilities and grounds-keeping. All SCTA facilities are equipped with security cameras for monitoring and investigation of any incidents.

Subsection 5.4.4 Key Staff

Pursuant to 49 CFR Part 673.23(d)(4), SCTA may designate key staff, groups of staff, or committees to support the Accountable Executive, Chief Safety Officer, or SMS Executive in developing, implementing, and operating the Authority's SMS. SCTA may designate other individuals, including key staff, groups of staff and committees to support the development, implementation, and operation of the Authority's SMS. Their authorities, accountabilities, and responsibilities must be described in the Safety Plan.

SCTA currently utilizes an internal committee comprised of the Manger of Safety & Training as the lead, along with the Chief Safety Officer, Director of Shared Ride, Director of Maintenance and Director of Operations for the monthly review of all accidents/incidents reported by employees. This committee also receives input from the Operation Supervisors that may also be involved in the investigation of accidents/incidents.

As noted under the ERS System, the Authority has been utilizing a committee of staff, operators, and maintenance for the review of route and schedule changes that includes potential changes in policies and procedures with safety-related items often included in the reviews. This committee makes recommendations to senior management on potential changes with ultimate approval by the Board of Directors. This committee meets as needed, usually from February to May for this process.

Section 6 Safety Risk Management (SRM)

Under Part 673, SCTA is required to develop and implement an SRM process applied to all elements of its system. SCTA must conduct safety hazard identification, safety risk assessment, and safety risk mitigation activities. Once hazards are identified, other procedures must be developed under safety risk management to analyze and assess the risk resulting from these hazards, as well as to institute controls to reduce or eliminate the risks from these hazards. SCTA has implemented a Safety Risk Management process for all elements of its transportation system. The Safety Risk Management process is comprised of the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation.

Subsection 6.1 Safety Hazard Identification

Pursuant to 49 CFR Part 673.25(b)(1) and (2), SCTA must establish a process for safety hazard identification, which includes specifying sources of information about hazards and their associated

consequences. SCTA will consider the results of its asset condition assessments in its TAM Plan when performing safety hazard identification activities through its SMS. The results of the condition assessments and SRM activities will help SCTA make a determination as to whether an asset meets the state of good repair standards under 49 C.F.R. Part 625.

The following is SCTA's methods and processes to identify hazards and consequences of the hazards:

- Employee safety reporting program
- Observations of operations
- Inspections
- Internal safety investigations
- Accident reports
- Compliance programs
- Committee reviews
- Industry data
- Governmental sources (FTA, NTSB, PADOT)
- Customer and public feedback or complaints

While there are many sources for safety information and many ways to identify hazards as shown above, the key attributes that SCTA will utilize for effective hazard identification include:

- The more comprehensive the data sources and documentation, the more confident management can be that safety concerns are being identified;
- Training employees on proper identification and reporting of safety concerns increases the likelihood that hazards can be addressed;
- Focus on the collection of safety concerns while safety staff work with operations and management personnel to identify the exact hazard(s); and
- Promote and support Authority-wide safety concern reporting and hazard identification.

Subsection 6.2 Safety Risk Assessment

Pursuant to 49 CFR Part 673.25(c)(1) and (2), SCTA must establish methods or processes to assess the safety risks associated with identified safety hazards. A safety risk assessment includes an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations, and prioritization of the hazards based on the safety risk. SCTA must establish procedures for assessing the safety risk of the consequences of identified safety hazards and prioritizing the hazards based on this safety risk. SCTA must assess safety risk in terms of likelihood (the probability of a consequence occurring) and severity (the seriousness of a consequence, if it does occur).

SCTA has decided to adopt the U.S. Department of Defense Standard Practice, System Safety, MIL-STD-882E, severity categories and likelihood levels to use as a guide for its risk assessment process. To determine the appropriate severity category as defined in Table I for a given hazard at a given point in time, identify the potential for death or injury, environmental impact, or monetary loss. A given hazard may have the potential to affect one or all of these three areas. The severity categories are as follows:

Table I. Severity Categories

Description	Severity Category	Mishap Result Criteria
Catastrophic	1	Could result in one or more of the following: death, permanent total disability, Irreversible significant environment impact, or monetary loss equal to or exceeding \$1 Million.
Critical	2	Could result in one or more of the following: 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 \$500 Thousand but less than \$1 Million.
Marginal	3	Could result in one or more of the following: injury or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$50 Thousand but less than \$500 Thousand.
Negligible	4	Could result in one or more of the following: injury or occupational illness not resulting in a lost work day, minimal environmental impact, or monetary loss less than \$50 Thousand.

To determine the appropriate likelihood level as defined in Table II for a given hazard at a given point in time, assess the likelihood of occurrence of a mishap. Likelihood level F is used to document cases where the hazard is no longer present. No amount of doctrine, training, warning, caution, or Personal Protective Equipment (PPE) can move a mishap probability to level F.

Table II. Likelihood Levels

Description	Level	Specific Individual Item	Fleet or Inventory
Frequent	A	Likely to occur often in the life of an item	Continuously experienced.
Probable	B	Will occur several times in the life of an item.	Will occur frequently.
Occasional	C	Likely to occur sometime in the life of an item	Will occur several times.
Remote	D	Unlikely, but possible to occur in the life of an item.	Unlikely, but can reasonably be expected to occur
Improbable	E	So unlikely, it can be assumed occurrence may not be experienced in the life of an item	Unlikely to occur, but possible.
Eliminated	F	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.

When available, the use of appropriate and representative quantitative data that defines frequency or rate of occurrence for the hazard, is generally preferable to qualitative analysis. The Improbable level is generally considered to be less than one in a million. In the absence of such quantitative frequency or rate data, reliance upon the qualitative text descriptions in Table II is necessary and appropriate.

Assessed risks are expressed as a Risk Assessment Code (RAC) which is a combination of one severity category and one probability level. For example, a RAC of 1A is the combination of a Catastrophic severity category and a Frequent probability level. Table III assigns a risk level of High, Serious, Medium, or Low for each RAC.

Table III. Risk Assessment Matrix

Severity/ Probability	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (F)	Eliminated	Eliminated	Eliminated	Eliminated

Subsection 6.3 Safety Risk Mitigation

Pursuant to 49 CFR Part 673.25(d), SCTA, including ECC, must establish methods or processes to identify mitigations or strategies necessary as a result of the Authority’s safety risk assessment to reduce the likelihood and severity of the consequences. SCTA must establish an approach to determining when safety risk mitigation is necessary based on assessed safety risk. This may include setting criteria or thresholds for different levels of safety risk, and may involve assigning accountability to levels of management for the safety risk of operations under their control.

Mitigations may:

- Eliminate the safety risk of a hazard;
- Reduce the likelihood of the potential consequences of a hazard; and/or
- Reduce the severity of the potential consequences of a hazard.

The goal of SCTA is to always eliminate the hazard if possible. When a hazard cannot be eliminated, the associated risk should be reduced to the lowest acceptable level within the constraints of cost, schedule and performance by applying the system safety design order of precedence. Ideally, the hazard should be eliminated by selecting a design or material alternative that removes the hazard altogether. Safety risk mitigation enables the Authority to actively “manage” safety risk in a manner that is aligned with its safety performance targets, and consists of initial, ongoing, and revised mitigations.

When a hazard cannot be eliminated, SCTA will reduce the associated risk to the lowest acceptable level within the constraints of cost, schedules, and performance by applying the design order of precedence as follows:

- Eliminate hazards through design selection;
- Reduce risk through design alteration;
- Incorporate engineered features or devices;
- Provide warning devices; and
- Incorporate signage, procedures, training and personnel protective equipment.

For SCTA, the Department Directors with oversight for their services, will develop mitigations, supported by the SCTA's SRM, the Safety Committee, and SCTA's subject matter experts, as needed. Depending on the nature of the safety risk or mitigation, additional approvals may be required from the Executive Director as the Accountable Executive. Safety risk mitigations must include milestones, schedules, budget and the party(ies) responsible for implementation. Safety Committee will look to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. This activity may include the use of mitigation monitoring plans. The Department Heads or project manager that developed the mitigation will be responsible for inputting the mitigation information into SCTA's safety informational system. SCTA's SMS Committee will review the status of actions to implement mitigations and report any findings or concerns to the Executive Director. The Safety Manager will include information on the development and implementation of safety risk mitigation in quarterly reports shared throughout SCTA.

For the contracted services by ECC, the Director of Shared Ride Services, in coordination with the Safety Manager, monitors ECC's safety risk mitigation process through quarterly on-site record reviews and mitigation documentation submitted by ECC.

Subsection 6.4 Infectious Disease Exposure

SCTA shall follow the guidance of the Centers for Disease Control and Prevention (CDC) or the Commonwealth of Pennsylvania Department of Health on strategies for addressing infectious diseases.

Section 7 Safety Assurance

The third component of SCTA's SMS is Safety Assurance, which ensures the performance and effectiveness of safety risk controls established under safety risk management. Safety assurance is also designed to ensure that the Authority meets or exceeds its safety objectives through the collection, analysis, and assessment of data regarding the organization's performance. Safety assurance also includes inspection activities to support oversight and performance monitoring.

SCTA shall identify the data and information it will collect from its operations, maintenance, and public transportation services so that it may monitor the Authority's safety performance as well of the effectiveness of its SMS. SCTA will monitor its operations and maintenance protocols and procedures, and any safety risk mitigations, to ensure that it is implementing them as planned. Furthermore, SCTA will investigate safety events (as defined above) and any reports of non-compliance with applicable

regulations, standards, and legal authority. Finally, SCTA will continually monitor information reported to it through any internal safety reporting programs including the employee safety reporting program.

At present, SCTA routinely monitors the daily operation of both the fixed-route and shared-ride services through the dispatch offices, the AVL and Ecolane Systems for tracking the location and status of vehicles, and the two-way radio communications. The Directors of Operations and the Director of Shared Ride Services monitor the daily communications and respond when necessary if a safety incident or accident occurs. As previously noted, data is collected on a daily basis, as needed, and compiled into monthly reports on accident/incidents and service reliability by the maintenance departments.

Directors of Operations, Shared Ride and Maintenance Departments report on these activities monthly to the Chief Safety Officer. Each report documents, for the previous month, the results of:

- Rules compliance activities in the department, including coaching, retraining, or discipline for unsafe acts,
- Inspections of the department's equipment and infrastructure elements,
- Quality control and quality assurance assessments and reviews in the department, and
- Supervisor observations of activities performed in the department.

Data and information are analyzed to identify trends and allow monthly and annual comparisons.

Based on these reports, the Chief Safety Officer works with the managers in each department to review and investigate findings with implications for agency-wide compliance with and sufficiency of operations and maintenance procedures, and to determine the root cause and contributing factors for any issues.

The Chief Safety Officer presents the results of the reviews and investigations to the Safety Committee quarterly. The Safety Committee recommends what, if any, action is required, then the CSO directs pertinent department personnel to document and track actions taken in the agency's safety information system.

Subsection 7.1 Safety Performance Monitoring and Measurement

SCTA Safety Committee has established tasks to:

- Monitor the system for compliance with, and sufficiency, of the Authority's procedures for operations and maintenance;
- Monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- Conduct investigations of safety events to identify causal factors; and
- Conduct safety audits, studies, reviews, and inspections
- Monitor information reported through any internal safety reporting programs.

Safety performance monitoring and measurement involves the continual monitoring of the Authority's activities to understand safety performance. Through these efforts, SCTA should be able to determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it

is effectively implementing its SMS. FTA is not prescribing any specific process for investigating safety events, but notes that it is critical for transit agencies to identify and understand the causes of the Accidents, Incidents, and Occurrences in their systems so that the circumstances leading to the Events can be mitigated and prevented in the future.

In the event of a fatality, SCTA must comply with all FTA drug and alcohol requirements and 75 Pa. C.S. Section 4704. Pursuant to the Commonwealth statute, in the event a motor carrier vehicle or mass transit vehicle is involved in an accident that causes the death of the vehicle operator or another person, the motor carrier vehicle or mass transit vehicle and its equipment, load, driver and documents shall be inspected by a qualified Commonwealth employee as designated by 75 Pa. C.S. Section 4704 before the vehicle or driver will be allowed to continue operation. SCTA will contact the nearest PUC District Office to request a post-accident MCSAP bus inspection. The following table lists PUC District Offices:

PUC District Office	Manager	Telephone	Fax
Harrisburg District	Alan Taylor	717.787.7598	717.787.3114
Philadelphia District	Anthony Bianco	215.965.3721	215.965.4262
Pittsburgh District	Brian Mehus	412.423.9310	412.820.2607
Scranton District	Alan Taylor	570.963.4590	570.614.2070

Further, SCTA is a member of the Pennsylvania State Association for Transportation Insurance (SAFTI) which is a self-insured insurance pool comprised of 23 transit systems in the state. The insurance pool is managed by a Board of Directors comprised of Executives from the member agencies and employs professional risk management services. The SAFTI Pool has adopted Operating Standards for each system to comply with in terms of policies, procedures, hiring, and training requirements for operators and safety personnel at each Authority. It also includes minimum requirements for contracted services in terms of training and insurance levels. A copy of the SAFTI Standards are included in Appendix G. Statewide data is collected and reviewed by the risk management firm hired by SAFTI that also includes on-site safety inspections annually and anonymous on-board evaluations of operators. The on-going monitoring of operations and facilities is performed as follows:

Random Observations: Transportation Supervisors may conduct observations of Bus Operators for compliance with traffic laws, SCTA operating rules, and procedures. Any observed rule violations will be documented and submitted to the Director of Operations.

- **Behavior-Based Safety Observations:** Managers or technical specialists observe employees or contractors performing their assigned tasks and evaluate their actions based on SCTA’s safety policies and procedures and task-specific processes or procedures, if applicable. After each session, the manager or safety specialist discusses what they observed with the employee or contractor they observed and discusses any unsafe or potentially unsafe acts they may have observed. Sessions focus on constructively and positively reinforcing safe acts, gaining employee commitment to identify and avoid unsafe acts, and encouraging two-way communication about safety-related concerns. The manager or safety specialist performing the observations immediately addresses and acts on any observed life-threatening and unsafe behaviors.

- **Vehicle and Facility Inspections and Records Reviews:** Trained personnel from each SCTA department conduct and document monthly safety inspections at their maintenance and operations facilities for vehicles and infrastructure. These personnel also perform records reviews and trend analyses

regarding the results of vehicle and facility inspections to focus follow-up activities. Results are documented on standard SCTA departmental forms.

• **Video Monitoring:** SCTA's onboard monitoring system can be downloaded remotely when needed and when the vehicle is on property, it will download. Operations staff can review video events to ensure timely coaching, retraining, or discipline for unsafe acts in response to complaints or accidents/incidents. Coachable events are placed in the coaching queue to be addressed one-on-one with operators by training personnel. Additionally, supervisors review recordings when operators self-report non-compliance with safety rules or as a result of other employee reports. Operations staff also notify the Director of Maintenance of any events that relate to the Maintenance Department for coaching, retraining, and/or discipline. Managers of SCTA's Operations and Maintenance Departments report on these activities monthly to the Chief Safety Officer. Each report documents, for the previous month, the results of:

- Rules compliance activities in the department, including coaching, retraining, or discipline for unsafe acts,
- Inspections of the department's equipment and infrastructure elements,
- Quality control and quality assurance assessments and reviews in the department, and
- Supervisor observations of activities performed in the department.

Data and information are analyzed to identify trends and allow monthly and annual comparisons. Based on these reports, the Chief Safety Officer works with the managers in each department to review and investigate findings with implications for agency-wide compliance with and sufficiency of operations and maintenance procedures, and to determine the root cause and contributing factors for any issues.

Per contractual agreement, SCTA's Director of Shared-Ride Services, in coordination with the Chief Safety Officer, monitors the paratransit contractor's safety risk mitigation monitoring process through quarterly on-site records reviews and documentation that the contractor submits. SCTA provides post-review reports to the contractor and identifies deficiencies in the monitoring process. The contractor must submit a corrective action plan for any deficiency.

Safety Personnel ensures that SCTA carries out and documents all monitoring activities. Safety Personnel reports the results to the Chief Safety Officer and/or executive management as directed by the Accountable Executive. Specific procedures on how to carry out safety risk mitigation monitoring activities and forms to document those activities are on file in the Safety Department.

Safety Event Investigations to Identify Casual Factors

SCTA maintains documented procedures for conducting investigations of safety events (accidents, incidents, and occurrences, as defined in 49 CFR Part 673) to find causal and contributing factors and review the existing mitigations in place at the time of the safety event.

Local law enforcement also may respond to any SCTA safety event. As noted in SCTA's manual, SCTA will coordinate its investigation process with local law enforcement.

Operations and maintenance management are responsible for immediately notifying the Safety Department of any safety event that meets SCTA's thresholds. The Safety Department notifies the Accountable Executive (or designated personnel) of any events that resulted in a fatality, serious injury, or property damage to SCTA's vehicles or private vehicles that may exceed \$25,000. The Safety Department

ensures that all safety events are recorded and tracked in an electronic Safety Event Log in the safety information system.

The Safety Department also ensures compliance with reporting thresholds, requirements, and processes defined in *FTA's NTD Safety and Security Policy Manual* and with notification thresholds established by the National Transportation Safety Board and the Pennsylvania Department of Transportation.

SCTA's general safety investigation process consists of five basic phases.

- **Set up:** Assemble an investigation team with the required skills and expertise.
- **Fact gathering:** Record facts pertinent to understanding the circumstances leading to the safety event.
- **Event reconstruction:** Reconstruct the sequence of events.
- **Data analysis:** Analyze the information obtained through fact gathering and event reconstruction to assess the safety risk and provide explanations of the technical and operational factors and any underlying organizational factors and issues.
- **Establish conclusions:** Draw conclusions from the collected and analyzed information based on: Main and direct causes and contributing factors leading to the event.

Findings that point out additional hazards that have the potential to introduce safety risk but did not play a direct role in the event. Other findings that have potential to improve the safety of the transit system.

General Investigation Process

Safety Event Investigation Procedures

SCTA's safety event investigation procedures follow these steps:

- Bus Operators or Operations Supervisors notify Control Center/Dispatch of the safety event. The Operator of the affected transit vehicle follows seven basic emergency steps:
 - Stay calm.
 - Assess the situation.
 - Obtain help.
 - Protect people, then property.
 - Reassure and assist the passengers.
 - Secure the scene.
 - Gather information.
- Control Center/Dispatch immediately notifies Operations Management and the designated Safety representative.
- The investigation team is activated. This team normally consists of a trained Safety staff person and a trained Operations Supervisor or Training Instructor. The number and management level of the investigation team is based on the size and scale of the safety event.
- The investigation team arrives at the scene as soon as possible with tools to conduct the investigation. (The Safety Event Investigation Procedures manual provides a list of these tools.)
- The investigation team secures the scene and collects facts about what occurred, including interviewing the operator involved, if possible.

- The investigation team begins the technical investigative process, which includes but is not limited to the following:
 - Noting the environmental factors surrounding the safety event, such as lighting and visibility, road surface conditions, climate, and weather conditions.
 - Collecting vehicle and roadway evidence, including vehicle condition and position for all vehicles involved in the incident.
 - Recording tire marks, skid marks, tire tread prints, and yaw marks.
 - Observing braking-related factors.
 - Observing debris and vehicle fluids.
 - Observing contact and induced damage.
 - Making exterior damage assessments.
 - Photographing the scene.
 - Sketching the field.
 - Interviewing other drivers; witnesses; passengers; fire, emergency medical services, and police personnel at the scene. Interviewing maintenance personnel, if necessary, at a later date.
 - Making a drug-and-alcohol testing decision.
 - Finalizing the vehicle event and incident report form.

Identifying Causal and Contributing Factors

SCTA is committed to examining all safety events to determine causal and latent organizational factors that may have contributed to the safety event. This includes examining:

- Process;
- People/human factors;
- Management decision-making and resource support;
- Equipment, tools, and materials;
- Operating environment;
- Environmental issues;
- Existing relevant mitigations; and
- Other causes and contributing factors, as appropriate.

The investigators prepare a report based on this causal analysis and send copies to the Safety Department for immediate action (if necessary) and to the Accident and Incident Review Board for integration into their analysis of the event.

Accident and Incident Review Board

SCTA's Accident and Incident Review Board reviews information on all accidents and incidents to occur on SCTA property or involving SCTA vehicles, equipment or employees. The Accident and Incident Review Board does not review occurrences, as defined in 49 CFR § 673.5

SCTA's Accident and Incident Review Board consists of five members that include the Director of Fixed Route Operations, Director of Shared Ride, Director of Maintenance and the Manager of Safety and Training. The Chief Safety Officer chairs the board. The review board determines whether:

- The accident or incident was preventable or non-preventable

- Personnel require discipline or retraining;
- The causal factor(s) indicate(s) an unexpected or previously unconsidered operating condition or situation or an existing mitigation that may be ineffective, inappropriate, or not implemented as intended; or
- The accident or incident appears to involve underlying organizational causal factors beyond just individual employee behavior.

SCTA's Accident and Incident Review Board refers its findings to the Safety Department for further analysis and potential examination through SCTA's SRM process. Information on causal factors identified or confirmed by SCTA's Accident and Incident Review Board is filed in the CSO's office.

Per contractual agreement, the paratransit contractor must immediately notify SCTA's Director of Shared-Ride Services of any safety event that meets defined minimum thresholds. SCTA also monitors the paratransit contractor's safety investigation processes by reviewing investigation reports, causal analysis activities, and the contractor's response to investigation reports and causal analysis findings. The contractor is required to submit documentation on safety investigation activities to SCTA.

The Chief Safety Officer maintains all documentation of SCTA's investigation policies, and processes. All forms, checklists, activities, and results are found in the Safety Department.

Internal Safety Reporting Programs

The Chief Safety Officer and Safety Committee will review safety data and information captured in employee safety reports and safety meeting minutes. When necessary, the SMS Executive will ensure that the issues and concerns are investigated or analyzed through SCTA's SRM process.

The Chief Safety Officer and Safety Committee also review internal and external reviews, including audits and assessments, compliance with operations and maintenance procedures, and the effectiveness of safety risk mitigations. Then the Chief Safety Officer will discuss relevant safety issues and concerns with the Accountable Executive.

Per contractual agreement, the paratransit contractor must send quarterly reports to SCTA's Director of Shared-Ride Services documenting information reported through its internal safety reporting programs.

Subsection 7.2 – Management of Change

SCTA must establish a process for identifying and assessing changes that may introduce new hazards or impact SCTA's performance. If SCTA determines that a change may impact its safety performance, the Safety Committee will evaluate the proposed change through its Safety Risk Management process. It is important that SCTA leverage its field monitoring activities to support the identification of changes in a system that may not be planned. SCTA's management of change process is agency-wide and applies to all new and existing system elements. It includes changes identified through the SMS process as well as an active scan of changes resulting from:

- Design and implementation of new systems and other capital projects,
- Changes to existing systems or service,
- New services provided to the public,
- New operations or maintenance procedures,

- Organizational changes, including Authority Leadership and Accountable Executive changes,
- Changes in capabilities and organizational capacity,
- Procurement process changes, and
- Changes to relevant regulations, laws, policies, or other FTA's National Public Transportation Safety Plan or Safety Directives or Bulletins that may impact SCTA's safety program.

As noted previously, SCTA belongs to a statewide insurance pool that requires each member to conduct annual on-board evaluations of all operators and the Pool conducts on-site inspections of facilities to identify any safety deficiencies. The Pool sends a written report to the Authority that includes a Risk Management Score that requires the Authority to submit a plan on how any deficiencies will be corrected. This process also includes anonymous on-board evaluations of a random number of operators that includes scoring on various aspects of the operator's driving skills and customer service. All of this data is used to evaluate potential shortfalls and needs for training.

On a quarterly basis, under the direction of the Accountable Executive, the MCC requests input from SCTA departments regarding changes with the potential to impact safety performance. SCTA trains its managers on when and how to identify and report anticipated changes to the committee.

Each quarter, the MCC also reviews outputs from SCTA's configuration management process, engineering modification request process, safety certification process, rulebook update and general order system, and route planning process.

When the MCC determines a change may impact SCTA's safety performance, the committee directs the Chief Safety Officer to evaluate the change through the SRM process or to ensure another department or contractor is evaluating it through the SRM process.

The SRM process includes identifying a change's associated hazards and potential consequences, assessing safety risk, and, when necessary, creating new safety risk mitigations or modifying existing mitigations. When ST makes a change that requires new or revised mitigations, it monitors these mitigations as described in the mitigation monitoring section above.

Per contractual agreement, the paratransit contractor must have a management of change process that complies with 49 CFR Part 673 and addresses the changes specified in this section. SCTA's Director of Shared-Ride Services monitors the contractor's implementation of this process.

The Safety Department maintains policies, procedures, and documentation related to SCTA's management of change activities.

Subsection 7.3 – Continuous Improvement

SCTA must establish a process to assess its safety performance. If SCTA identifies any deficiencies as part of its safety performance assessment, the Authority must develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies. SCTA's process for assessing its safety performance includes:

- Monitoring the achievement of safety objectives and safety performance indicators and targets.
- Reviewing the effectiveness of:

- Hazard identification, safety risk assessment, safety risk mitigation development, and management of change activities;
- Operations and maintenance procedure monitoring activities;
- Safety risk mitigation monitoring activities;
- Safety investigation activities;
- Voluntary ESRP;
- Safety competencies and training efforts; and
- Safety communication.

The Chief Safety Officer with assistance from the Managers of Safety and Training, Director of Maintenance and the Directors of Operations are responsible for assessing SCTA's safety performance. Strategies for assessing safety performance and the effectiveness of SCTA's operations include, but are not limited to the following:

- Reviewing safety data, includes data related to safety objectives and safety performance indicators and targets;
- Conducting employee surveys to measure the effectiveness of the ESRP, safety training, and safety communication;
- Using audit checklists to identify how well the processes, activities, and tools within the SMS are performing;
- One-on-one and group interviews of key service delivery and support stakeholders;
- Attending safety committees and safety meetings;
- Conducting field observations;
- Auditing regulatory compliance; and
- Reviewing SMS documentation.

As noted, the monthly accident reports on the preventability of accidents is compiled on an annual basis to determine trends in preventable accident and incidents. This data is reviewed to identify potential areas for increased training and to identify potential hazards through the type and cause of accidents. The SAFTI Insurance Pool also reviews trend in accident and work related injuries to identify training needs and preventive measures that may need to be implemented. The Pool has a Safety Risk Committee comprised of several members Accountable Executives and conducts an annual Safety Risk Meeting of all members for the review of Pool data. These meetings and data are important for making on-going improvements to the Authority's safety program.

SCTA supports continuous improvement by addressing deficiencies it discovers during assessments of safety performance and SMS operations assessments. Corrective action plans, if needed, are carried out under the direction of the Chief Safety Officer who reports to the Executive Director monthly on progress.

Section 8 Safety Promotion

The fourth component of SCTA's SMS is Safety Promotion, which requires a combination of training and communication of safety information to employees to enhance the Authority's safety performance. SCTA established competencies and training for all Authority employees directly responsible for safety, and to establish and maintain the means for communicating safety performance and safety management information. This training program contains refresher training, as necessary.

SCTA must establish a comprehensive safety training program and must require employees and contractors, including the Chief Safety Officer or SMS Executive and SCTA's Board of Directors, to complete training to be able to fulfill their safety-related roles and responsibilities. SCTA also must require these individuals to complete refresher training, as necessary, to stay current with the Authority's safety practices and procedures.

Safety promotion ensures that SCTA employees and contractors are aware of policies and procedures related to the safety of Authority operations, and specifically as related to their areas of work. SCTA's comprehensive safety training program applies to all SCTA employees directly responsible for safety, including:

- Bus and paratransit van vehicle operators,
- Dispatchers
- Maintenance staff
- Managers and supervisors,
- Authority Leadership and Executive Management.
- Chief Safety Officer and Safety related personnel
- Accountable Executive.

Training has been developed for each designated position throughout the agency, appropriate to the position's individual safety-related job responsibilities and role in the SMS. This training includes instruction and testing to verify initial competency, as well as refresher training and recertification requirements to ensure employees remain current on the agency's policies and procedures. Basic training requirements for SCTA employees, including frequencies and refresher training, are documented in ST's Safety Training Matrix and the SCTA Employee Handbook.

Operations safety-related skill training includes the following:

- New hire bus operator classroom and hands-on skill training;
- Bus operator refresher training;
- Bus operator retraining (recertification or return to work);
- Skill training for bus shifters and fuelers;
- Skill training for bus cleaners;
- Skill training for painting and body-shop personnel;
- Classroom and on-the-job training for control center employees/schedulers/dispatchers at the time of external hire or internal promotion;
- Classroom and on-the-job training for operations supervisors at the time of external hire or internal promotion; and
- Safety event investigation training, including the Transportation Safety Institute (TSI) Fundamentals of Bus Collision Investigation and on-the-job training.

Vehicle maintenance safety-related skill training includes the following:

- Ongoing vehicle maintenance technician skill training;
- Ongoing skill training for vehicle maintenance supervisors;
- Safety event investigation training for vehicle maintenance supervisors;
- Ongoing hazardous material training for vehicle maintenance technicians and supervisors; and

- Training provided by vendors.

Facility maintenance safety-related skill training includes the following:

- Ongoing facility maintenance technician skill training;
- Ongoing skill training for facility maintenance supervisors;
- Ongoing hazardous material training for facility maintenance technicians and supervisors; and
- Ongoing fire prevention training for facility maintenance technicians and supervisors.

For the Safety Department, ST participates in the Voluntary Bus Safety Training Program outlined in FTA's Public Transportation Safety Certification Training Program regulation, 49 CFR Part 672. ST's designated Safety Department personnel will complete the following curricula, in accordance with the Program's specifications:

- SMS Awareness (e-Learning);
- Safety Assurance (virtual instructor-led);
- SMS Principles for Transit (classroom); and
- Transit Safety and Security Program managed by TSI: Effectively Managing Transit Emergencies,
- Transit Bus System Safety, and
- Fundamentals of Bus Collision Investigation.

Following the conclusion of this training, designated personnel will complete refresher training that includes, at a minimum, one hour of safety oversight training.

SCTA also conducts SMS initial and refresher training on basic SMS principles and the mandatory and voluntary ESRP for frontline and supervisory operations and maintenance employees

SCTA's Director of Shared Ride Services regularly monitors contractor safety skill training and SMS training, including refresher training, to ensure the contractor is supporting SCTA's safety and safety management mission and complying with SCTA's requirements. SCTA's Director of Shared-Ride Services documents monitoring activities and results in formal reports and audits

Subsection 8.1 Safety Communication

SCTA shall communicate safety and safety performance information throughout the Authority's organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through an employee safety reporting program. To provide ongoing emphasis of safety and performance, SCTA has installed video monitors in all the employee lounges, driver's room, and maintenance areas that can be programmed to display custom messages. SCTA has utilized this continually through the COVID-19 pandemic to show messages on activities of the Authority to address such items as how to properly wear a mask, effective steps for prevention, and other messages. There are also message boards in the passenger waiting areas that are used for custom messaging and will be included as part of SCTA's effort to promote safety and the adoption of the safety plan. In addition, SCTA utilizes special memos to relay information with copies placed in every employee's in-house mailbox. For staff, SCTA utilizes blast emails to relay timely information which will be utilized to promote the safety plan and to solicit feedback.

Subsection 8.2 Competencies and Training

Training of all employees with respect to their role and responsibilities as they relate to the Authority's safety performance is perhaps the most critical driver for successful SMS implementation. It also shapes employee perception of executive management's commitment to safety. Achieving appropriate levels of competency for each staff level enables the consistent application of their skills to help the transit agency achieve its safety performance objectives. Training has been developed for each designated position throughout the Authority, appropriate to the position's individual safety-related job responsibilities and role in the SMS. Operations safety-related skill training includes the following:

- New hire bus and van operator classroom and hands-on skill training;
- Bus and van operator refresher training;
- Bus and van operator retraining (return to work or post-accident)
- Skill training for Utility maintenance positions;
- Skill training for bus cleaners;
- Classroom and on-the-job training for dispatchers for new hires or promotions;
- Classroom and on-the-job training for operations supervisors at the time of hire and refresher training; and
- Safety event investigation training, including the Transportation Safety Institute (TSI) Fundamentals of Bus Collision Investigation and on-the-job training.

Vehicle maintenance safety-related skill training includes the following:

- Ongoing vehicle maintenance mechanic skill training;
- Ongoing skill training for maintenance supervisors;
- Safety event investigation training for maintenance supervisors;
- Ongoing hazardous material training for mechanics and supervisors; and
- Training provided by vendors.

Facility maintenance safety-related skill training includes the following:

- Ongoing facility maintenance skill training;
- Ongoing skill training for facility maintenance supervisors;
- Ongoing hazardous material training for facility maintenance supervisor;
- Ongoing fire prevention training for facility maintenance supervisors.

SCTA budgets a minimum of eight hours of training per year for all operators. SCTA also takes advantage of special training conducted by the insurance pool and PADOT through its RTAP Program, named PennTrain. These special trainings have included certifications in accident investigation, work related injuries, conflict avoidance, operator assault, Incident Management Systems and SMS Principles for Transit. SCTA ensures that the front-line employees that are directly responsible for the implementation of the safety program attend such trainings, including senior management. The Accountable Executive has received all of these trainings to ensure a comprehensive understanding of the needs and evaluation of the Authority's Safety Plan.

SCTA has also developed a comprehensive Operator Training and Policy Manual that is distributed to all employees that includes a detail description of the internal accident reporting system. The Authority is in

the process of updating this manual and will include the Authority's Safety Policy and the principles of SMS.

For all safety related positions, SCTA participates in the Voluntary Bus Safety Training Program outlines in FTA's Public Transportation Safety Certification Training Program regulation, 49 CFR Part 672.

SCTA's designated safety personnel will complete the following curricula, in accordance with the Program's specifications:

- SMS Awareness;
- Safety Assurance
- SMS Principles for Transit; and
- Transit Safety and Security Program managed by TSI:
 - Effectively Managing Transit Emergencies,
 - Transit Bus System Safety, and
 - Fundamentals of Bus Collision Investigation.

Following the conclusion of this training, designated personnel will complete refresher training that includes, at a minimum, one hour of safety oversight training. SCTA also conducts SMS initial and refresher training on basic SMS principles and the mandatory and voluntary ESRP for frontline and supervisory operations and maintenance employees. SCTA's Managers of Safety and Training, and the Director of Shared Ride Services regularly monitor contractor safety skill training and SMS training, including refresher training, to ensure the contractor is supporting SCTA's safety and safety management mission and complying with SCTA's requirements. All monitoring efforts are documented and results in formal reports and audits.

Section 9 Documentation

Pursuant to 49 CFR Part 673.31, SCTA shall maintain records of its documents that are developed in accordance with this policy and FTA requirements. FTA expects SCTA to maintain documents that set forth its Public Transportation Agency Safety Plan, including those related to the implementation of its SMS such as the results from SMS processes and activities. For the purpose of reviews, investigations, audits, or other purposes, this section requires the Transit Agency to make these documents available to PennDOT, FTA, and other Federal agencies as appropriate. The Agency shall maintain these documents for a minimum of three years.

SCTA and its contractor will maintain documentation related to the implementation of its SMS; the programs, policies, and procedures used to carry out this Agency Safety Plan; and the results from its SMS processes and activities for three (3) years after creation. This documentation will be available to the Federal Transit Administration or other Federal or oversight entity upon request.

RESOLUTION 26 - 2023

**RESOLUTION ADOPTING THE UPDATED SAFETY PLAN FOR SOUTH CENTRAL
TRANSIT AUTHORITY**

WHEREAS, the South Central Transit Authority (SCTA) supports 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 of other management systems of SCTA; this includes processes and procedures to implement Safety Management Systems through the SCTA established Safety Committee, which comprised of an equal number of frontline employee representatives and management representatives.

WHEREAS, SCTA will integrate the management of safety among the primary responsibilities of all managers and employees;

WHEREAS, SCTA will 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 SCTA's Safety Management System;

WHEREAS, SCTA has established a Safety Committee that will identify and recommend risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the SCTA safety risk assessment; identify mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from SCTA's operations or activities to a point which is consistent;

WHEREAS, SCTA will ensure that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program(near miss), unless disclosure indicates, beyond a reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;

WHEREAS, SCTA will comply with, and whenever possible, exceed, legislative and regulatory requirements and standards;

WHEREAS, SCTA will ensure that sufficient skilled and trained human resources are available to implement the safety management process;

WHEREAS, SCTA, through the Safety Committee, will ensure that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated on tasks commensurate with their skills;

WHEREAS, SCTA will establish and measure safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and

WHEREAS, SCTA will ensure externally supplied systems and services to support operations are delivered meeting safety performance standards.

NOW, THEREFORE BE IT RESOLVED:

The Board of SCTA hereby adopts the SCTA Safety Plan in accordance with the requirements of the Federal Transit Administration and certifies that SCTA is in compliance with 49 U.S.C. § 5329(d), and SCTA's Transit Asset Management Plan in accordance with 49 U.S.C. § 5326.

Certification

I, Gail Landis, Secretary of the Board of the South Central Transit Authority, do hereby certify that the foregoing is a true and correct copy of a resolution adopted at a regular meeting of the Board held on the 15th day of November, 2023.

Gail Landis, Secretary
SCTA Board
November 15, 2023

CERTIFICATE OF COMPLIANCE

In accordance with the requirements of 49 CFR Parts 673.13(a) the South Central Transit Authority (SCTA) as authorized in 49 CFR Parts 673.11(d), hereby certifies that it has established a Public Transportation Agency Safety Plan meeting the requirements of this part effective September 16, 2020.

*The South Central Transit Authority further certifies that on an annual basis it will certify its compliance with **49 CFR Parts 673.13 (b)** in accordance with the SCTA Safety Plan adopted by the Board of Directors on November 15, 2023.*

BY: _____ DATE: _____
Greg Downing, Executive Director
SCTA

Appendix C – Sample Monthly Safety Report

FIXED ROUTE ACCIDENT SUMMARY

	<u>JUNE</u>			<u>YEAR-TO-DATE</u>		
	<u>2019</u>	<u>2020</u>	<u>% CHG</u>	<u>2019</u>	<u>2020</u>	<u>% CHG</u>
<u>PREVENTABLE ACCIDENTS</u>						
Stationary Objects	6	4	-33%	22	23	5%
Moving Objects	0	0	#DIV/0!	1	7	600%
Pass Injury Only	0	0	#DIV/0!	2	0	-100%
Other	0	0	#DIV/0!	0	6	#DIV/0!
Sub-Total	6	4	-33%	25	36	44%
<u>NON-PREVENTABLE ACCIDENTS</u>						
Standing Collision	0	2	#DIV/0!	8	9	13%
Moving Collision	1	0	-100%	7	3	-57%
Pass Injury Only	0	0	#DIV/0!	2	2	0%
Other	0	3	#DIV/0!	2	8	300%
Sub-Total	1	5	400%	19	22	16%
<u>TOTAL ACCIDENTS</u>	7	9	29%	44	58	32%
<u>INCIDENTS</u>						
Pass Fall No Injury	0	3	#DIV/0!	15	11	-27%
Thrown Objects No Damage	1	0	-100%	4	1	-75%
Other	4	12	200%	44	63	43%
Total Incidents	5	15	200%	63	75	19%
TOTAL ACCIDENTS/INCIDENTS	12	24	100%	107	133	24%

	<u>REVENUE MILES</u>	
	<u>2019</u>	<u>2020</u>
Per Preventable Accidents	4,812	3,297
Per Non-Preventable Accidents	6,332	5,395
Per Total Accidents	2,734	2,046
Per Total Accidents & Incidents	1,124	892
TOTAL REVENUE MILES	2019	120,299
	2020	118,680
	CHG	-1.35%

SERVICE IMPROVEMENT SUGGESTIONS

In order to improve the quality and effectiveness of our services, we are providing an opportunity for all employees to submit suggestions on ways to improve service. Please indicate any suggestions you may have on this form according to each category listed.

1. SCHEDULES -Please list any suggestions for changes in the bus schedules in terms of running times, frequency of service, additions or reductions. (Attach copy of schedule, if needed)

2. ROUTES - Please list any suggestions for route changes on existing routes. (Attach route map, if needed)

3. NEW SERVICE - Please list any suggestions for new bus service.

4. OPERATING PROCEDURES/POLICIES - Please list any suggestions for changing daily operating procedures that would improve service or simplify procedures.

5. MARKETING/ADVERTISING - Please list any marketing or suggestions to increase ridership.

6. EQUIPMENT/VEHICLES - Please list any suggestions to improve the quality of service to our customers and concerning the eight new buses soon to be ordered.

7. TRANSIT CENTER - Please list any suggestions you may have concerning the transit center.

8. OTHER SUGGESTIONS – Please list any suggestions you may have concerning areas not listed above.

NAME: _____ **(Optional)**

Your cooperation and assistance is greatly appreciated.

Appendix E - SCTA Monthly Maintenance Report

PERFORMANCE ANALYSIS

MONTH: **June**

CURRENT FY 2020

PRIOR FY 2019

	MONTH	YEAR TO DATE	MONTH	YEAR TO DATE
TOTAL MILES	117,394	1,561,110	126,621	1,575,083
TOTAL FUEL	27,719	317,597	30,669	355,839
TOTAL OIL (Qt)	12	594	158	1,946
M. P. G.	4.24	4.92	4.13	4.43
M. P. / QT.	9,467	2,629	801	809
MAJOR SYSTEM FAILURES	17	183	26	240
MINOR SYSTEM FAILURES	22	214	21	266
TOTAL SYSTEM FAILURES	39	397	47	506
MILES MAJOR SYSTEMS	6,906	8,531	4,870	6,563
MILES MINOR SYSTEM	5,336	7,295	6,030	5,921
MILES TOTAL FAILURES	3,010	3,932	2,694	3,113
FIXED ROUTE MILES	118,680	1,494,180	120,005	1,363,888
GARAGE/MAINTENANCE MILES	(1,286)	66,930	6,616	211,195
SERVICE TRUCK MILES	139	6,408	896	11,192
SERVICE TRUCK FUEL	18	667	111	1,225
WRECKER MILES	0	3	0	142



Berks Area Regional Transportation Authority

1700 North 11th Street, Reading, PA 19604

Phone – 610.921.0601



Fax – 610.921.9420

www.bartabus.com



email – barta@bartabus.com

Near Miss Report Form

What's the difference between a "near miss" and an accident? A near miss is similar to an accident with the exception that **a near miss does not result in injury or property damage**. No matter how trivial they are, near misses should be reported to your supervisor just as accidents are. As an employee, you need to understand that it's just as important (and part of your responsibility) to report a near miss as it is to report an accident. Reporting near misses in a timely manner can help determine how to prevent a recurrence that could result in a serious injury.

Unsafe working conditions, unsafe employee work habits, improper use of equipment, use of malfunctioning equipment, unsafe intersections, hazardous areas along your route or any hazards on Authority property, all have the potential to cause work related injuries and property damage.

Please complete this form to assist in bringing awareness of any unsafe acts or unsafe conditions.

Date of Occurrence: _____

Location of Occurrence: _____

Department: (Circle) Admin Fixed Route Special Serv. Maintenance

Time of Occurrence: _____ a.m. / p.m.

Please check all that apply:

_____ Unsafe Act _____ Unsafe Condition

_____ Unsafe Equipment _____ Unsafe Use of Equipment

Describe the near miss occurrence in detail. Try to answer the Who, What, Where, When, Why and How questions with regard to the occurrence: (Use the other side if necessary)

Completed by (optional): _____ Date: _____

** Forward this report to the Director of Operations or the Manager of Safety & Training for review and follow-up **

Please check box if you want a copy of this form sent to the President of ATU, Local 1345.

SAFTI Standards

Required Policies

SAFTI members will have all applicable policies required by SAFTI standards.

- Administrative/Personnel Policy (includes Sexual Harassment, Family Medical Leave, and Drug Free Workplace provisions)
- Driver Management Policy
- Driver Medical Qualifications Policy
- Environment, Health, & Safety Policy
- Substance Abuse Policy
- Light Duty/Return to Work Policy
- Vehicle Maintenance Policy
- Accident Reporting & Investigation Policy

These policies will be approved by the governing board and communicated to employees and documented via policy communication sign-off.

Member policies will be reviewed periodically by SAFTI legal counsel.

All personnel will undergo Harassment Training every three years at a minimum.

Accident Investigation

SAFTI members will meet minimum standards for accident reporting and investigation.

Any supervisor visiting an accident scene and/or filling out an accident report will have completed either the T.S.I. 5-day accident investigation course or Daecher Consulting's 2-day accident investigation training.

All SAFTI members will use the approved reporting forms for vehicle and workplace accidents.

All vehicle and workplace incidents and accidents will be reported through Gallagher Bassett's Risk-Facs online system within 48 hours.

All preventable vehicle and workplace accidents will result in appropriate discipline and/or remedial training.

Vehicle and workplace accident files will be reviewed annually by Daecher Consulting Group.

Driver Hiring and Training

SAFTI members will use an approved Driver Management Policy for hiring – reasonable standards for driving experience, driving record, and criminal record.

- Bus Drivers
 - ⇒ Minimum of 3 years licensed (any class) for all drivers
 - ⇒ Minimum hiring age of 21 with additional hiring criteria as follows:
 - Additional hiring criteria for ages 21 and 22 as follows:
 - 100% clean MVR at hire
 - Pass a Personality Assessment approved by SAFTI
 - Quarterly MVR checks until age 23
 - At least one documented anonymous onboard evaluation or vehicle shadowing observation annually from date of hire until age 23
 - At least one quarterly documented random video review from date of hire until age 23 * Documentation of evaluations and observations must be completed on standard SAFTI forms and be a minimum of 15 minutes in length.
 - Additional hiring criteria for ages 23 and 24 as follows:
 - 100% clean MVR at hire
 - Pass a Personality Assessment approved by SAFTI
- Mechanics & Service Workers
 - ⇒ Minimum hiring age of 16 with additional hiring criteria as follows:
 - Additional hiring criteria for ages 16 to 17 as follows:
 - No driving of authority vehicles
 - All required workplace safety policies and procedures must be developed
 - New hire workplace safety orientation training must be developed and documented
 - Mechanics and service workers must be supervised at all times
 - Company mechanic must inspect work prior to being placed into service
 - Additional hiring criteria for ages 18 to 23 as follows:
 - 100% clean MVR at hire
 - Age 18-20 can only drive buses on authority property
 - Age 21-22 can test drive or switch out buses with no customers onboard
 - 23 and over can drive buses in revenue service

SAFTI members will develop and meet minimum training standards for:

- New Driver Training – All new driver hires will undergo new driver training through
 - PennTRAIN’s Master Trainer, TransitSCORE, or PennSCORE programs,
 - Daecher Consulting’s online modules, and/or
 - TAPTCO video training.

- Remedial Training – All preventable accidents will result in appropriate remedial training.
- Refresher Training – All drivers who have been employed for at least 12 months will complete annual refresher training.

SAFTI members will have a graduate of PennTRAIN’s Master Trainer, TransitSCORE, or PennSCORE on staff or will have access to a graduate who will supervise driver training. Training files will be reviewed annually by Daecher Consulting Group.

Supervisor Training

SAFTI members will meet minimum training standards for supervisors.

All supervisors who manage/supervise employees must complete the CTAA Certified Community Transportation Supervisor (CCTS) course through PennTRAIN.

All new supervisors should complete the CCTS web-based prerequisite course as soon as possible after their hire/promotion. They must complete the 2-day instructor-led course within 12 months from their date of their hire/promotion.

Supervisors who have more than 5 years of supervisor experience and have completed PennTRAIN’s Professional Supervisor Program (PSP) Training courses are exempt from this training requirement.

Training files will be reviewed annually by Daecher Consulting Group.

Onboard Evaluations

SAFTI members will document at least one onboard evaluation annually for each driver. A supervisor will have a face-to-face meeting annually with each driver to review his/her performance. The evaluation will result in remedial training where appropriate.

Driver files will be reviewed annually by Daecher Consulting Group.

Annual Risk Management Seminar

At least one supervisor/manager from each SAFTI member is required to attend the annual Risk Management Seminar each year.

All Transportation and Maintenance Directors are strongly encouraged to attend annually as are supervisors with Human Resource responsibilities.

****Model policies, forms, and other documents can be found on the Daecher Consulting Group SAFTI website.***

Standards unanimously approved

November 2007

Updated April 2009

Updated September 2016

Updated February 2020

Updated August 2022

Updated February 2023

Contractor Insurance Requirements

Adopted April 11, 2009

If all vehicles are provided by contractor

Prior to the start of work, contractor shall provide the Authority with evidence of insurance in form and substance acceptable to the Authority. Contractor agrees to maintain the same or equivalent insurance during the entire term of this Agreement. Minimum insurance requirements are outlined below.

1) Insurance Limits

a) Workers' Compensation Insurance

Insurance in accordance with the laws of the Commonwealth of Pennsylvania and, if applicable,

other workers' compensation type insurance (e.g. USL&H).

\$1,000,000 Employer's Liability

b) Automobile Liability Insurance

\$2,000,000 combined single limit per occurrence (Insurance Code 1 –any vehicle)

\$5,000 Personal Injury Protection limit per person

c) General Liability

\$2,000,000 per occurrence. Annual aggregate limit, if any, must be at least \$3,000,000 with at least

\$2,000,000 applying exclusively to this agreement.

These limits can be any combination of insurance such as primary \$1,000,000 combined single limit per occurrence with \$2,000,000 specific job aggregate limit plus \$1,000,000 umbrella

limit. Contractor agrees that if \$1,000,000 or more of the primary aggregate limit is exhausted by paid and/or reserve claim(s) and/or any event(s) reasonably likely to be a claim(s), contractor will purchase insurance to fully replenish the aggregate unless the aggregate is so diminished after insurance policy expiration.

2) Policy form on 'Occurrence' basis

3) Insurance company with A.M. Best's Rating or A- or higher and VI or higher

4) Federal Transit Administration, the Commonwealth of Pennsylvania, the Authority and their board members, officials, employees (AND OTHERS AS APPROPRIATE) added as Additional Insured for Automobile and General Liability as respects this Agreement.

- 5) Insurance company must provide (not just endeavor) the Authority Executive Director (change title as required) with at least thirty (30) day notice of cancellation or material change.
- 6) Policy terms (conditions, exclusions, limitations, etc.) must be acceptable to Authority
- 7) No Cross liability exclusion
- 8) Certificate of insurance must not include a Matter of Information only limitation

These are only minimum insurance requirements acceptable to the Authority. These requirements may not be adequate to fully honor the indemnification agreement or otherwise protect the interests of the Contractor.

If Contractors Drives Any Authority Vehicle

Prior to the start of work, contractor shall provide the Authority with evidence of insurance in form and substance acceptable to the Authority. Contractor agrees to maintain the same or equivalent insurance during the entire term of this Agreement. Minimum insurance requirements are:

1) Insurance Limits

a) Workers' Compensation Insurance

Insurance in accordance with the laws of the Commonwealth of Pennsylvania and, if applicable,

other workers' compensation type insurance (e.g. USL&H).

\$1,000,000 Employer's Liability

b) Automobile Liability Insurance

\$2,000,000 combined single limit per occurrence (Insurance Code 1 –any vehicle)

\$5,000 Personal Injury Protection limit per person

c) Automobile Physical Damage

Comprehensive and Collision coverage with actual cash valuation

\$2,500 or less deductible per vehicle (contractor is responsible for the deductible)

d) General Liability

\$2,000,000 per occurrence. Annual aggregate limit, if any, must be at least \$3,000,000 with at least

\$2,000,000 applying exclusively to this agreement.

These limits can be any combination of insurance such as primary \$1,000,000 combined single limit per occurrence with \$2,000,000 specific job aggregate limit plus \$1,000,000 umbrella

limit. Contractor agrees that if \$1,000,000 or more of the primary aggregate limit is exhausted by paid and/or reserve claim(s) and/or any event(s) reasonably likely to be a claim(s), contractor will purchase insurance to fully replenish the aggregate unless the aggregate is so diminished after insurance policy expiration.

- 2) Policy form on 'Occurrence' basis
- 3) Insurance company with A.M. Best's Rating or A- or higher and VI or higher
- 4) Federal Transit Administration, the Commonwealth of Pennsylvania, the Authority and their board members, officials, employees (AND OTHERS AS APPROPRIATE) added as Additional Insured for Automobile and General Liability as respects this Agreement.
- 5) Insurance company must provide (not just endeavor) the Authority Executive Director (change title as required) with at least thirty (30) day notice of cancellation or material change.
- 6) Policy terms (conditions, exclusions, limitations, etc.) must be acceptable to Authority
- 7) No Cross liability exclusion
- 8) Certificate of insurance must not include a Matter of Information only limitation

Easton Coach Company Safety Program

Easton Coach Company (“ECC”) is deeply committed to the importance of a strong safety and training program at all of our transportation locations, including our SCTA operations in Lancaster and Reading, as further described in the following sections:

- A. Safety Program Overview
- B. Safety Effectiveness
- C. Incident and Accident Reporting and Procedures/Timely Notification
- D. School Bus Safety and TAPTCO Paratransit Driver Training
- E. Lytx/DriveCam
- F. ECC Wheelchair Securement Certification Program
- G. Ongoing Driver Training and On-Road Quality Assurance
- H. Driver Recruitment, Screening, Hiring and Training
- I. Driver Training

A. Safety Program Overview

Safety is paramount to ECC and all its operations. We are committed to stringent driver qualification, initial and ongoing training, effective management, driver monitoring, innovative use of technology, and strong vehicle maintenance - all key ingredients to a strong safety program.

ECC’s safety team is overseen by Jim Barnwell, our Corporate Director of Safety and Training. Jim joined Easton Coach Company in 2023 with over 12 years’ experience in the transportation field. Prior to joining ECC Jim served as an Area Safety Manager with National Express LLC and a similar role with the United States Navy’s Strategic Weapons System. Previously, Jim served as a Master Training Specialist in the Navy and has over 6 years as a professional trainer and 6 years as a School Bus Safety Company and TAPTCO Paratransit Company driving instructor.

Jim oversees the company’s 15 Safety Managers and their teams of driver trainers. Each of ECC’s satellite operations are staffed with a Safety/Training Manager and local project manager.

ECC’s safety/training staff certifications include DriveCam, PASS trainer (CTAA) and PennScore. Curriculum in the PennScore certification includes:

1. Completion of PennScore* 100 Hour training program
 - a. 8 hours training - Customer Service
 - b. 8 hours training - Hiring Great Drivers
 - c. 16 hours training - System Safety Orientation
 - d. 16 hours training - Understanding and Avoiding Conflict
 - e. 16 hours training - Defensive Driving for the Van / Bus Operator
 - f. 16 hours training - Essential Training Skills
 - g. 20 hours training - Passenger Assistance

*PennScore is a comprehensive operator hiring and training program developed through the cooperative efforts of the Pennsylvania Public Transportation Association (PPTA), the Pennsylvania Transportation Institute at Penn State University (PennTrain), and the Pennsylvania Department of Transportation.

2. Community Transportation Association - Passenger Service and Safety (PASS) Train the Trainer (Certified)
3. "Sure-Lok" Wheelchair and Occupant Restraint Systems - Completion of the "Train the Trainer" program
4. DSI Medical Services, Inc. - Completion of the "Substance Abuse Awareness and the Manifestations and Characteristics of Behavior Impairment" (49 CFR Parts 382.603 & 655.14)
5. National Transit Institute (Rutgers University) - 6 hour Infectious Disease Awareness and Prevention "Train the Trainer" program

B. Safety Effectiveness

ECC prides itself on conducting monthly telephonic safety meetings to review new accidents and incidents (including DriveCam incidents) and any other safety matters, including the progress of safety and training initiatives such as School Bus Safety Company and TAPTCO Paratransit driver training, ride-alongs (physical and virtual), and risk management. These meetings are led by the Safety management and attended by members of the Safety Committee. The committee consists of a cross section of management and employees from various functions within the company, including our president, senior operations management, risk manager, the corporate director of safety, location safety managers and other management and driver advocacy group representatives.

C. Incident and Accident Reporting and Procedures/Timely Notification

ECC maintains a comprehensive policy and system of procedures for any vehicle accident or passenger incident. This policy includes definitions (accident, incident), driver responsibilities segregated by type and severity of accident (vehicular, slip/fall, etc.), post-accident procedures (including adoption of all FTA regulations), follow-up and emergency evacuation procedures.

Pursuant to ECC policies, all defined accidents or incidents, regardless of severity or location, must be reported to the customer immediately. Initial reports shall be made by telephone, with written reports provided to the customer within contractually-stipulated time frames.

Below please find a copy of ECC's current "Accident Procedures" policy.

**EASTON COACH COMPANY
ACCIDENT PROCEDURES**

Definition of an Accident: Any contact of your vehicle with another vehicle, fixed object, animal, or pedestrian. Completion of the 2-sided form is required.

Definition of an Incident: Includes slips, trips, and falls of your passenger. May also include a medical incident such as seizures, etc. Completion of a separate form is required for those incidents.

The driver is responsible for the completion of the appropriate report by the end of his/her shift. Completed reports may be given to the dispatcher if the safety manager is not available.

Accident involving crash with one or more vehicles:

Assess the condition of any passengers onboard.

Move vehicle from active lane of traffic if possible and shut off engine.

Evacuate if necessary, then contact dispatch.

Contact the dispatcher over the radio by declaring "Emergency" and identifying yourself.

Communicate with the dispatcher the following:

Who is involved?

What happened, what is the severity of the accident, what is the condition of any passengers, what help do you need i.e. fire, police, E.M.S., etc.?

Where are you?

Attend to your passengers (if any)

Gather information at the scene – use the appropriate report located onboard to assist you in the process.

When possible, another staff member will respond to the scene.

Take photographs of any vehicle, property damage, and surroundings.

Cooperate with all law enforcement by providing necessary documents (driver's license, insurance, registration) as well as assisting in their investigation by answering any questions.

Do not speak to any media directly. All incidents and accidents are "under investigation" and when appropriate, a statement in writing would come from the company president or vice-president.

Incident involving a slip, trip, or fall:

Assist the passenger at the time of the incident.

Assess the condition of the passenger.

Contact the dispatcher. Inform dispatch of the situation and if you need any medical attention (such as EMS).

Complete the required form.

Turn in the completed form by the end of your shift.

Post Accident Procedures

Easton Coach Company follows all FTA regulations related to post accident testing for drug abuse and alcohol misuse.

The Safety Department will investigate all accidents and will, as required, post accident test a driver meeting the criteria to test.

Following any collision, the driver's schedule is covered and the driver does not drive pending the outcome of the investigation.

Reports are filed to our insurance carrier within 24hrs.

The Safety Committee reviews all accidents on a weekly basis. A determination of whether an accident was preventable, non-preventable or non-determinable will be made. A recommendation from the safety committee will be given to the driver along with a plan for any additional training as deemed necessary.

Number of exits
 Throw radio microphone out the window
 Tell all ambulatory to assist injured and/or non-ambulatory passengers
 Remain calm, give clear, concise instructions
 Lead and Participate in the Evacuation (know your own limitations)
 Release passenger(s) from their safety belts
 Lead to the most usable exit
 Assist ambulatory passengers
 Assist non-ambulatory passengers
 Verify all passengers have been evacuated and move passengers a safe distance from the vehicle.
 Contact the Dispatcher
 Place warning devices (triangles) if possible
 Provide support to evacuated passengers

In summary, should the situation warrant evacuation:

Stop - Shut down - Evacuate - Call for Assistance

Don't worry about material things on your bus; take care of yourself and passengers first.

Below please find an excerpt from Easton Coach Company Driver Manual which outlines our "Driver Accident Procedures":

**EASTON COACH COMPANY
 DRIVER ACCIDENT PROCEDURES**

Accident involving crash with one or more vehicles:

1. Assess the condition of any passengers onboard.
2. Move vehicle from active lane of traffic if possible and shut off engine.
1. Evacuate if necessary, then contact dispatch.
2. Contact the dispatcher over the radio by declaring "Emergency" and identifying yourself.
3. Communicate with the dispatcher the following:
 - Who is involved?
 - What happened, what is the severity of the accident, what is the condition of any passengers, what help do you need i.e. fire, police, E.M.S., etc.?
 - Where are you?
4. Attend to your passengers (if any)
5. Gather information at the scene – use the appropriate report form located onboard accident report kit to assist you in the process. When possible, a safety staff member will respond to the scene.
6. Take photographs of any vehicle, property damage, and surroundings.
7. Cooperate with all law enforcement by providing necessary documents (driver's license, insurance, registration) as well as assisting in their investigation by answering any questions. When providing information to the police or exchanging information with the other parties, use Easton Coach's phone number as your phone. Do not give your personal home or cell phone number.
8. Do not admit fault or liability, even in speaking with the police.
9. Do not disclose the presence or functionality DriveCam to anyone except Easton Coach safety/management personnel.
10. Do not speak to any media directly. All incidents and accidents are "under investigation" and when appropriate, a statement in writing would come from the company president or vice-president.
11. Do not speak with another insurance company's representative.
12. Easton Coach uses the latest technology when investigating an incident

Incident involving a slip, trip, or fall, or any other medical emergency:

1. If onboard vehicle enroute, stop as soon as possible in a safe location.
2. Assist the passenger as you are able.
3. Assess the condition of the passenger.
4. Contact the dispatcher. Inform dispatch of the situation and if you need any medical attention.

0. Complete the required form.
1. Turn in the completed form by the end of your shift.

Post-accident procedures

1. Easton Coach Company follows all FTA regulations related to post accident testing for drug abuse and alcohol misuse.
2. The Safety Department will investigate all accidents and will, as required, escort the driver for post accident testing when required.
3. Following any collision, the driver's schedule is covered. Safety department personnel will be sent to the scene to investigate. The driver does not continue his/her run pending the outcome of the investigation. The driver does not leave the accident site unless released by the safety department.
4. Reports are required filed to our insurance carrier within 24 hours.
5. The insurance company will require a driver's statement in most cases. The safety department will provide the driver with the telephone number and claim number so that the driver can speak with the insurance company agent.
6. The Safety Committee reviews all accidents on a weekly basis. A determination of whether an accident was "preventable", "non-preventable" or "non-determinable" will be made. A recommendation from the safety committee will be given to the driver along with any additional training.

D. School Bus Safety and TAPTCO Paratransit Driver Training

ECC utilizes the School Bus Safety and TAPTCO Paratransit driver training programs at all locations. This system has existed for over 30 years and has become the leader in the training of professional drivers on how to avoid accidents. The LLLC program is built around Four Driving principals:

- Look Ahead** – Gathering information down the road ahead
- Look Around** – Gathering information around the vehicle
- Leave Room** – Managing space around the vehicle
- Communicate** – Communicating safely with motorists and pedestrians

These four principals to driving safety provide an easy-to-understand framework for professional defensive driving techniques.

Below is an excerpt from TAPTCO Paratransit Company website:

Bus Driver Training Courses for Transit & Paratransit Drivers, Trainers, Safety Leaders and Shop Employees

Our transit and paratransit bus driver training courses change the behavior of drivers to avoid accidents and keep every passenger safe. The courses are built around high-quality [driver and passenger safety videos](#) designed to engage the class and provide effective learning.

*For more than 30 years, the safety experts at the **Transit & Paratransit Company** have been designing [bus driver training](#) programs to reduce accidents and improve the safety of bus drivers and their passengers. Over 450 agencies and almost every major contractor use the TAPTCO training courses at their every location to improve safety efforts. Each agency or contractor has the highest standard in the industry thanks to TAPTCO.*

The [TAPTCO training courses](#) are video-based and delivered by many professional narrators. They clearly show the desired behaviors of bus drivers. There are many techniques to maintain trainee attention such as driver pop-ups, alternative views, and many stops to inspire discussion.

E. Lytx/DriveCam

DriveCam is a vital component of ECC's company-wide safety, training, and observation/virtual ride observation program. Currently, we have DriveCam in over 600 ECC-operated vehicles including many with the latest generation of DriveCam SF300.

We were one of the early adopters of DriveCam and have been using DriveCam for almost twenty years. It is a simple-to-use continuous video recorder. It constantly monitors driving activity and records unusual events such as hard braking, no seatbelts, eating while driving, excessive curve speed, crash, or collision along with offering 200 hours of continuous recordings. DriveCam now combines artificial intelligence with machine vision, in the latest version, offering real time coaching and enhanced triggers.

DriveCam can improve driving habits, reduce accidents, protect against lawsuits, and is highly regarded by insurance carriers. It is extremely valuable as the device continuously records and, as such, takes a lot of the guess work out of investigations. With the continuous recording feature, we have almost real time video for over 95% of our accidents and incidents. In our experience, DriveCam's greatest value is in identifying coachable habits of our drivers by cataloguing incidents and "near-misses" that demonstrate such habits. Insurance carriers estimate that there is one accident for every ten near misses. DriveCam captures the near misses so that we can re-train, proactively observe, and discipline (including, if severe enough, termination) offending drivers before an actual accident occurs.

This technology enhances our safety program by allowing us the opportunity to observe the driving habits of our employees through virtual observations and develop customized training programs as necessary. If required, an in-person ride-along with a member of the safety team would occur to further evaluate driving skills and re-train in areas of need. It has been a game changer to our risk management team as we evaluate exposure with real time video and are able to develop specific claim strategies expeditiously. These virtual observations can be done at any time and in real time (and could go back several weeks if warranted) so our safety team has no restrictions on when they can observe a driver's performance. The ability to perform observations virtually eliminates the possibility of a getting an inauthentic perspective of a driver who is on his "best behavior" with a live reviewer on board.

We estimate that DriveCam has reduced cell phone usage by our drivers by over 75% because every driver knows that if s/he is caught on DriveCam using a cell phone or other hand-held electronic device that severe discipline will ensue.

F. ECC Wheelchair Securement Certification Program

ECC maintains a "Wheelchair Securement Certification Program" in which all paratransit drivers must demonstrate proficiency in wheelchair securement techniques prior to completion of the training course and at regular periods thereafter. ECC drivers are certified to competence levels according to manufacturers', ADA and ECC standards. Initial certification, issued for a period of no longer than three months, allows safety and supervisory personnel to reevaluate new drivers within that period to ensure compliance with all safety procedures and policies. Driver wheelchair securement proficiency is recertified periodically (at least annually) throughout their tenure at ECC.

G. Ongoing Driver Training and On-Road Quality Assurance

ECC's Safety Program emphasizes our ongoing Driver training and quality assurance currently in place at all of our operations.

Company-wide ongoing training consists primarily of quarterly drivers' meetings, regular road observations performed in person or virtually via the DriveCam systems by our safety team (the key element of our road supervision program), and driver specific follow-up after accidents or incidents (particularly DriveCam events).

ECC holds driver meetings every three months at each of our locations that emphasize safety, customer service and customer sensitivity topics and issues. Meetings typically consist of: (1) a review of recent accident/incident information that includes actual DriveCam footage demonstrating events and driver patterns and a detailed review of five or so specific accidents and the application of the TAPTCO Four Driving principals; and (3) specific training and retraining in relevant topics including Wheelchair Securement, Passenger Assistance and/or Customer Service and Sensitivity Training. We also utilize guest speakers from third parties such as our insurance carriers and other safety-related sources and vendors. These meetings also offer drivers a forum to voice their observations, issues and concerns.

To provide ongoing consistent communication of important safety and other matters, ECC utilizes workplace mounted TV monitors using repeated visual exposure with the intent to engage, inform and motivate employees and change behavior. Content is designed by ECC or selected from thousands of available contents and displayed continuously on the TVs at select intervals.

ECC's On-Road Quality Assurance is based on our commitment to road observation and supervision, ongoing training and our safety program.

Due to safety concerns during the COVID pandemic, in 2020 ECC accelerated a transition to reduce the number of on-board, on-road observations and inspections and instead increased the use of real-time monitoring of actual trips using the Lytx/DriveCam Camera Systems. Under the latest generation of DriveCam products, ECC can immediately access "live" camera data (both forward looking and vehicle interior/driver view) from any PC at any location at any time. The DriveCam system has always constantly monitored driving activity and recorded unusual events such as hard braking, no seatbelts, eating while driving, excessive curve speed, crash, or collision; now there is real-time access to the camera views along with storing the last 200 hours of every vehicle operations. Given the ease of use of the DriveCam virtual observation system and the time-savings available by eliminating the commuting, deadhead and other non-productive in-vehicle time, we are able to perform far more frequent (and authentic and insightful) observations than were achievable under the old ride-along system.

Using this new technology, our Operations Managers and Safety/Training Managers perform virtual road supervision and ride observations of drivers. We find these virtual observations to be a good reminder to drivers that keeps them focused on the TAPTCO LLLC tenets of maintaining a safe cushion of space around their vehicles as circumstances dictate and keeping their eyes moving.

ECC's safety and operations managers will observe and evaluate Drivers and vehicles throughout the normal workday, including routine observations, virtual DriveCam observations, on-time performance, safety skills, MDT/Tablet usage, accident/incident investigations, ride and site checks and customer

service checks. Our managers also routinely visit larger centers and drop-off/pick-up points to observe drivers and formulate specific refresher and retaining regimens as necessary.

Any driver about whom we get a complaint, or who has been involved in a significant preventable accident or incident (often noted via DriveCam) will get coaching/remedial training that could include some or all of the following: (1) a remedial ride-along/skills assessment shortly after the incident in question; (2) a repeat of the BTW training for a few days and; (3) a road test. A written progressive discipline policy is in effect and followed throughout our organization.

H. Driver Recruitment, Screening, Hiring and Training

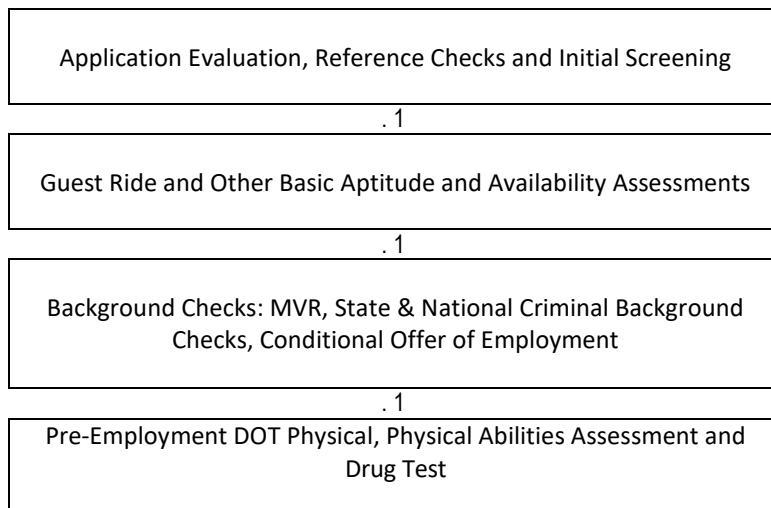
ECC is deeply committed to the importance of a strong driver recruitment, qualification and training program which are key ingredients to a strong and safe paratransit operation.

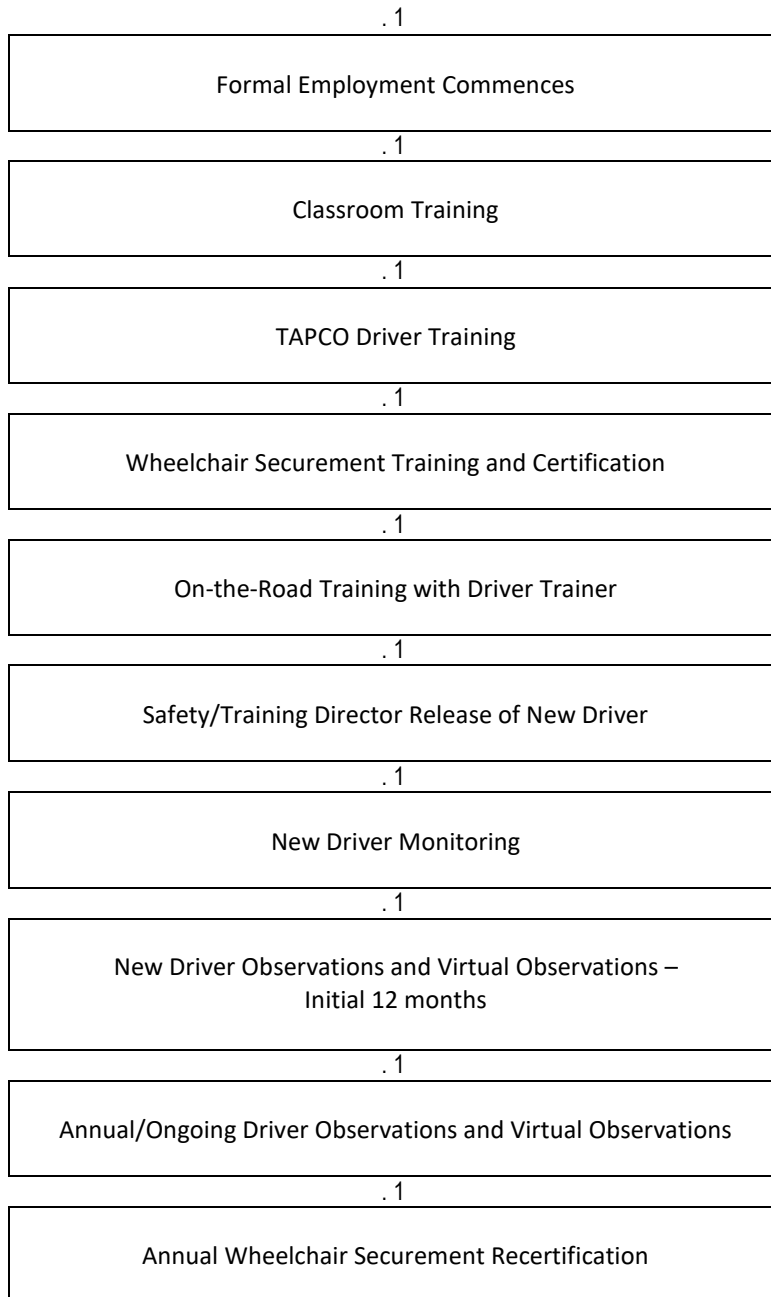
Our driver philosophy emphasizes retention of good drivers. Beginning with the hiring process and throughout a driver's tenure with ECC, we focus on identifying and keeping quality people. ECC driver retention performance is as successful as any transportation company, and we invest heavily in recruitment, selection, training, retention, and promotion. ECC offers a strong and highly competitive compensation and benefits package to all of its employees including drivers and support staff.

ECC currently hires several hundred drivers each year in Pennsylvania and New Jersey. Our driver philosophy emphasizes recruitment and retention of good drivers. Beginning with the hiring process and throughout a driver's tenure with ECC, we focus on identifying and keeping quality people. ECC driver retention performance stacks up well against any others in the paratransit business. Turnover rates typically average about 15% to 20% across our various paratransit operations.

All ECC drivers are employees of the company. No "lease" programs, Form 1099-type contractors, or other "contractual arrangements" are used by ECC to retain drivers.

Below please find an outline of the typical ECC recruitment and hiring process applied at our various operations, as well as an overview of these key driver recruitment, qualification and training steps.





I. Driver Training Program

After approval and presentation and acceptance of a job offer, the comprehensive training program begins. ECC driver training programs are customized to conform to each specific contract and customer requirements.

Typically, the ECC program includes one week on-site or “classroom” training in our local facility and up to two weeks on-the-road with an experienced driver/trainer. Generally, our training focuses on customer

service, driving skills development, safety, vehicle pre/post trip and route planning. Our classroom curriculum also includes extensive training on handling persons with specialized needs and customer service skills.

During and following the training, each ECC driver trainee undergoes an extensive evaluation with written comments and grading at several important job elements, including professionalism (appearance, punctuality, positive attitude, etiquette), customer service (passenger interactions, radio use, knowledge of codes, etc.), pre- and post-trip routines, mapping/geographical skills, paperwork traits (manifest documentation, other key forms), wheelchair lift and securement procedures, basic driving skills (speed, turns, RR crossings, lane changes, mirror use, etc.).

Each driver must also go through a defensive driving instruction program. Every ECC driver must complete the TAPCO instructional training course, widely recognized as the industry standard. DriveCam clips are another effective training tool used to demonstrate our high priority for safety.

The training session typically begins with an introduction and overview provided by an ECC Training representative and covers the Employee Handbook, Drug, Alcohol and Sexual Harassment policies and utilizes third party videos to communicate these topics.

Driver expectations are addressed during the first portion of training, including an overview of ECC's safety and training program, manifests and schedules, customer service/passenger assistance topics and job-related personal habits.

Customer service topics are thoroughly addressed, including passenger assistance, customer sensitivity and the Americans with Disabilities Act (ADA). Disability types, limitations the passenger may have and communication techniques are also covered extensively. The training material is modeled after PennSCORE programs and the CTAA's (Community Transportation Association of America) "PASS" Program.

The applicable fleet of vehicles is introduced and thoroughly covered, including exterior, dimensions, interior controls, seating, securement equipment and locations, lift operations, emergency equipment and exit procedures. Wheelchair securement is a highly-emphasized component of ECC training and includes both classroom training and on-vehicle practical experience and instruction with various types and makes of wheelchairs. Upon completion of the wheelchair training sessions and prior to a driver being released to solo duty, drivers must receive their first wheelchair securement certification.

Vehicle pre-trip and post-trip procedures are also addressed and demonstrated with instruction from ECC maintenance team members. Senior ECC maintenance staff also provides an overview of vehicle and maintenance matters including PMs, common maintenance problems, dual rear wheels, charging system, lift problems, seats and seatbelts, engine basics, transmission, brakes, vehicle clearance and the completion of the Vehicle Inspection Report (VIR).

Driving skills and philosophies are extensively addressed through ECC's adaptation of the TAPCO for paratransit operators (as further described below).

Other topics of instruction include site specific policy and procedures, dispatch roles and functions, manifests and data collection, street network, mapping and local geography, schedules, fare structures,

collections and codes, uniforms and codes of conduct, fueling, emergency procedures, blood borne pathogens, etc.

During and following the training, each ECC driver trainee typically undergoes an extensive evaluation including written comments and grading at several important job elements, including professionalism (appearance, punctuality, positive attitude, etiquette), customer service (passenger interactions, radio transmissions (use, knowledge of codes, etc.), pre- and post-trip routines, mapping/geographical skills, paperwork traits (manifest documentation, other key forms), wheelchair lift and securement procedures, basic driving skills (speed, turns, RR crossings, lane changes, mirror use, etc.)

Road tests are used to evaluate the driving skills of the trainee and identify any areas that may require any additional training. Evaluation includes a variety of routine driving conditions, roadways, signage, etc.

Finally, written reviews are utilized to evaluate a trainee's understanding of the information covered during class. If there is an area that requires additional clarification, ECC trainers will work with each trainee to convey the information and develop the skills necessary to complete the task.

ECC drivers also must demonstrate proficiency in wheelchair securement techniques prior to completion of the training course and at least annually thereafter. ECC drivers are certified to proficiency according to manufacturers', ADA and ECC standards. Initially, this certification is no longer than six months so as to allow safety and supervisory personnel to re-evaluate new drivers within that period and better ensure compliance with all safety procedures and policies. Driver wheelchair securement proficiency is recertified periodically (at least annually) throughout a person's tenure at ECC.