

RESOLUTION NO. 2020- 238

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, APPROVING THE 2020 PUBLIC TRANSPORTATION AGENCY SAFETY PLAN (PTASP) REQUIRED BY THE FEDERAL TRANSIT ADMINISTRATION; AND AUTHORIZING THE SUNSHINE BUS COMPANY TO IMPLEMENT THE PLAN.

WHEREAS, on July 19, 2018, the Federal Transit Administration (FTA) published the Public Transportation Agency Safety Plan (PTASP) Final Rule, which requires certain operators of public transportation systems that receive federal funds under FTA's Urbanized Area Formula Grants to develop safety plans that include the processes and procedures to implement Safety Management Systems (SMS), and;

WHEREAS, The FTA published a Dear Colleague letter on July 19, 2019 alerting the transit industry that in order to be compliant, operators of public transportation systems are required to create and approve an Agency Safety Plan (ASP) by July 20, 2020.

WHEREAS, in collaboration with the Sunshine Bus Company, St Johns County staff prepared the attached PTASP, using current NTD data.

NOW THEREFORE, BE IT RESOLVED by the Board of County Commissioners of St. Johns County, Florida, that:

1. The above recitals are incorporated by reference into the body of this resolution and such recitals are adopted as findings of fact.
2. The Board of County Commissioners hereby approves the Public Transportation Agency Safety Plan, and the Sunshine Bus Company is authorized to implement the plan.
3. The County Administrator or his designated representative is authorized to execute any other related documents and take any other actions necessary in connection with the submittal of the grant.
4. To the extent that there are typographical or administrative errors that do not change the tenor, or concept of this Resolution or the PTASP, then this Resolution and/or the PTASP may be revised without the subsequent approval of the Board of County Commissioners.

PASSED AND ADOPTED by the Board of County Commissioners of St. Johns County, State of Florida, this 7th day of July 2020.

**BOARD OF COUNTY COMMISSIONERS OF
ST. JOHNS COUNTY, FLORIDA**

By: _____

Jeb S. Smith
Jeb S. Smith, Chair

ATTEST: Brandon Patty, Clerk

RENDITION DATE 7/9/20

By: _____

Pam Hatterman
Deputy Clerk



**St Johns County Sunshine Bus
Public Transportation Agency
Safety Plan**

Issued July 2020

Table of Contents

1. TRANSIT AGENCY INFORMATION	2
2. PLAN DEVELOPMENT, APPROVAL, AND UPDATES	2
3. SAFETY PERFORMANCE TARGETS	3
4. SAFETY MANAGEMENT POLICY	4
5. SAFETY RISK MANAGEMENT	7
6. SAFETY ASSURANCE	10
7. SAFETY PROMOTION	12
8. ADDITIONAL INFORMATION	14
9. DEFINITIONS OF SPECIAL TERMS USED IN THE SAFETY PLAN	14
10. LIST OF ACRONYMS	17
11. ATTACHMENT A: RISK ASSESSMENT MATRIX	19
12. ATTACHMENT B: RESOLUTION	20
13. ATTACHMENT C: PUBLIC HEARING NOTICE	22

1. Transit Agency Information

Transit Agency Name	St Johns County Council on Aging, Sunshine Bus Company (SJCCOA)		
Transit Agency Address	2595 Old Moultrie Road, St Augustine, Florida 32086		
Name and Title of Accountable Executive	Rebecca Yanni, Executive Director St Johns County Council on Aging		
Name of CSO (CSO) or SMS Executive	Matthew McCord, Director of Transportation St Johns County Council on Aging, Sunshine Bus Co.		
Mode(s) of Service Covered by This Plan	Fixed Route Paratransit	List All FTA Funding Types	5307,5339,5311,5310
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Deviated Fixed Route, Paratransit; Contracted Service		
Does the agency provide transit services on behalf of another transit agency or entity?	Yes <input checked="" type="checkbox"/>	No	Description of Arrangement(s) St Johns County Council on Aging contracts with the County RFP No. 16-37 Contract: 16-MCC-STJ-07616
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	St Johns County Board of County Commissioners 500 San Sebastian View St. Augustine, Florida 32084		

2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Rachel Garvey, St Johns County Transportation Development	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	St Johns County BOCC Res. #	
	Relevant Documentation (title and location)	
	A copy of St Johns County Resolution # 2020- , approving the Agency Safety Plan is maintained on file by the County Transit Grants Specialist.	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification

		Relevant Documentation (title and location)	
Version Number and Updates			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1		New Document	

Annual Review and Update of the Public Transportation Agency Safety Plan
<p>This ASP addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.</p> <p>This Plan will be jointly reviewed and updated by the Chief Safety Officer, the Transportation Director and the Transit Grants Specialist by July 1 of each year. The Accountable Executive will review and approve any changes, signing the new or updated ASP and the Transit Grants Specialist will maintain the original record.</p>

3. Safety Performance Targets

Safety Performance Targets							
Performance targets are based on the safety performance measures established under the National Public Transportation Safety Plan. Targets are based on the average of the Sunshine Bus safety performance data for fiscal years 2017-2019.							
Mode of Service	Fatalities (total)	Fatalities (per 600k Annual VRM)	Injuries (total)	Injuries (per 100,000 VRM)	Safety Events (total)	Safety Events (per 100,000 VRM)	System Reliability (failures per 100k VRM)
Fixed Route/ Deviated Fixed Route	0	0	6	2	8	2.6	.5
ADA/ Paratransit	0	0	14	4.6	6	2	.75

Safety Performance Target Coordination

<p>St Johns County shares the Agency Safety Plan (ASP), including safety performance targets, with the North Florida Transportation Planning Organization (TPO) each year after its formal adoption by the Board of County Commissioners. The County also provides a copy of the adopted plan to the Florida Department of Transportation, District 2 Office (FDOT). County and SJCCOA personnel are available to coordinate with the FDOT and TPO in the selection of FDOT and TPO safety performance targets upon request.</p>			
Targets Transmitted to the State	State Entity Name		Date Targets Transmitted
	FDOT District 2		
Targets Transmitted to the MPO	Metropolitan Planning Organization Name		Date Targets Transmitted
	North Florida TPO		

4. Safety Management Policy

<p>Safety Management Policy Statement</p>	
<p>Safety is a core value at the SJCCOA and the management of safety is one of our core business functions. The Sunshine Bus Company is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all our 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. All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the SJCCOA Executive Director and Transportation Director. The Sunshine Bus Company is committed to the following safety objectives:</p> <ul style="list-style-type: none"> • Communicating the purpose and benefits of the Safety Management System (SMS) to all staff, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training. • Providing a culture of open reporting of all safety concerns, ensuring that no action will be taken against any employee who discloses a safety concern through the reporting program, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence or a deliberate or willful disregard of regulations or procedures. • Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team. • Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level. • Establishing safety performance targets that are realistic, measurable, and data driven. Continually improving our safety performance through management processes that ensure appropriate safety management action is taken, and is effective. 	

Rebecca Yanni, Executive Director St Johns County Council on Aging	Date

Safety Management Policy Communication

The Transportation Director, who leads SMS activities, introduced our staff to SMS principles in July 2020 at an All-Staff Meeting. The Safety Management Policy Statement was distributed to each employee in the form of a handout during this all-staff training. The COA also posts copies of the Statement on bulletin boards and in the operations and maintenance break areas of the Transit Center. The COA also has incorporated review and distribution of the Safety Management Policy Statement into new hire training and all-staff annual refresher training.

Authorities, Accountabilities, and Responsibilities

Accountable Executive	<p>The Executive Director serves as the SJCCOA Accountable Executive with the following authorities, accountabilities and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Controls and directs resources needed to develop and maintain the ASP and SMS; • Designates an adequately trained Chief Safety Officer (CSO) who is a direct report; • Ensures that the SMS is effectively implemented; • Ensures action is taken to address substandard performance in the SMS; • Assumes ultimate responsibility for carrying out the ASP and SMS; and • Maintains responsibility for carrying out the agency’s Transit Asset Management Plan.
------------------------------	---

Chief Safety Officer or SMS Executive	<p>The Accountable Executive designates the Transportation Director as the Chief Safety Officer, who has the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Develops The Sunshine Bus Co. ASP and SMS policies and procedures; • Ensures and oversees day-to-day implementation and operation of the SMS; • Manages the Employee Safety Reporting Program (ESRP); • Chairs the Safety Committee and; <ul style="list-style-type: none"> • Coordinates the activities of the committee, • Establishes and maintains the Trend Analysis Log and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents, and accidents, and • Maintains and distributes minutes of committee meetings. • Advises the Accountable Executive on SMS progress and status;
--	--

	<ul style="list-style-type: none"> • Identifies substandard performance and develops action plans for approval by the Accountable Executive; • Ensures policies are consistent with the safety objectives; • Provides SRM expertise and support for other personnel in conducting and overseeing Safety Assurance activities.
<p>Agency Leadership and Executive Management</p>	<p>Agency leadership and executive management also have authorities and responsibilities for day-to-day SMS implementation and operation of the Sunshine Bus SMS under this plan. Agency Leadership and Executive Management include:</p> <ul style="list-style-type: none"> • Transportation Director • Fleet Maintenance Manager • Human Resources Coordinator • Sunshine Bus Manager, Paratransit Manager and Supervisors • Facilities Maintenance Supervisor <p>COA Leadership and Executive Management personnel have the following authorities, accountabilities, and responsibilities:</p> <ul style="list-style-type: none"> • Participate as Members of the Safety Committee (Operations Managers and Supervisors will be rotated through the Safety Committee on a one-year term and other positions are permanent members); • Complete training on SMS and ASP elements; • Oversee day-to-day operations of the SMS in their departments; • Modify policies in their departments consistent with implementation of the SMS, as necessary; and • Provide subject matter expertise to support implementation of the SMS as requested by the Accountable Executive or the CSO, including SRM activities, investigation of safety events, development of safety risk mitigations, and monitoring of mitigation effectiveness.
<p>Key Staff</p>	<p>The Sunshine Bus Co. uses the Safety Committee, as well as the quarterly Transportation Staff Meetings, to support its SMS and safety programs.</p> <ul style="list-style-type: none"> • Safety Committee Any safety hazards reported will be jointly evaluated by the Safety Committee and the CSO during the bi-monthly meeting. The Safety Committee members include the CSO, Sunshine Bus Manager, Paratransit Bus Manager, Road Supervisor, Fleet Maintenance Supervisor, Facilities Maintenance Supervisor, a representative from Dispatch, a representative from Fixed Route, a representative from Paratransit, and a representative of Risk Management who meet bi-monthly to review issues and make recommendations to improve safety. • Drivers' Meetings A permanent agenda item in all drivers' meetings is dedicated to safety. Safety issues are discussed and documented. • Quarterly All-Staff Meetings Hazard reports and mitigations will be shared, safety topics will be brought up for open discussion, further feedback solicited, and hazard self-reporting further encouraged. Information discussed in these meetings will be documented.

Employee Safety Reporting Program

The Sunshine Bus Co. Employee Safety Reporting Program (ESRP) encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. There are several ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the daily Operations Log.
- Report conditions anonymously via a locked comment box in the driver area, or dedicated email address.
- Report conditions directly to any Supervisor, Manager, or Director.

Examples of information typically reported include:

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

On a bi-weekly basis, the CSO reviews the dispatch daily Operations Log and documents items identified as safety conditions in the Trend Analysis Log. The CSO, supported by the Safety Committee, as necessary, will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and resolved through the SRM process and that reported deficiencies and non-compliance with rules or procedures are managed through the Safety Assurance process.

The CSO discusses actions taken to address reported safety conditions during the quarterly All-Staff Meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the CSO or designee follows up directly with the employee when he or she determines whether or not to take action and after any mitigations are implemented.

The Sunshine Bus Co. encourages participation in the safety reporting program by protecting employees that report safety conditions in good faith. However, disciplinary action may be taken if the report involves:

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

5. Safety Risk Management

Safety Risk Management Process

- Ensure employees have the ability to report hazards to management in person or through the use of a hazard identification form;
- Ensure hazards are placed on a hazard log for tracking and documentation
- Represent management or select designee to represent management on the safety committee.
- Ensure each hazard has been assigned to a specific individual
- Ensure employees receive appropriate hazard management training

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

The CSO leads the SRM process, working with the Safety Committee to identify hazards and consequences, assess safety risk of potential consequences, and mitigate safety risk. The results of the SRM process are documented in our Trend Analysis Log and referenced materials.

The SRM process applies to all elements of our system including our operations and maintenance, facilities and vehicles, and personnel recruitment, training and supervision. In carrying out the SRM process, we use the following terms:

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

Safety Hazard Identification

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

- Employee safety reporting,
- Review of vehicle camera footage,
- Review of monthly performance data and safety performance targets,
- Observations from supervisors,
- Maintenance reports,
- Comments from customers, passengers, and third parties,
- Safety Committee, Drivers' and All-Staff Meetings,
- Results of audits and inspections of vehicles and facilities,
- Results of training assessments,
- Investigations into safety events, incidents, and occurrences, and
- FTA and other oversight authorities (mandatory information source).

When a safety concern is observed by any management or supervisory personnel, whatever the source, it is reported to our CSO. Procedures for reporting hazards to the CSO are reviewed during staff meetings and in the Safety Committee. The CSO also receives employee reports from the ESRP, customer comments related to safety, and the dispatch daily Operations Log. The CSO reviews these sources for hazards, and documents them in the Trend Analysis Log. The CSO also may enter hazards into the Trend Analysis Log based on their review of operations and maintenance, the results of audits and observations, and information received from FTA and other oversight authorities, as well as the National Transportation Safety Board. The CSO may conduct further analysis of hazards and consequences entered into the Trend Analysis Log to collect information and identify additional consequences, and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, the CSO may:

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

The CSO will then discuss identified hazards and consequences with the Safety Committee during quarterly meetings. The discussion may include additional background on the hazards and consequences, such as the results of trend analysis, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities.

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

Safety Risk Assessment

The Sunshine Bus Co. assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk. The CSO and Safety Committee assess prioritized hazards using the Risk Assessment Matrix (see Attachment A). This matrix expresses assessed risk as a combination of one severity category and one likelihood level. For example, a risk may be assessed as "1A" or the combination of a Catastrophic severity category and a Frequent probability level.

This matrix also categorizes combined risks into levels: Unacceptable (High), Undesirable/Acceptable with reservation (Medium), or Acceptable (Low) based on the likelihood of occurrence and severity of the outcome. For purposes of accepting risk:

- “High” hazard ratings will be considered unacceptable and require action to mitigate the safety risk,
- “Medium” hazard ratings will be considered undesirable and require the Safety Committee to make a decision regarding their acceptability, and
- “Low” hazard ratings may be accepted without additional review.

Using a categorization of High, Medium or Low allows for hazards to be prioritized for mitigation based on their associated safety risk. The CSO schedules safety risk assessment activities on the Safety Committee agenda and prepares a Safety Risk Assessment package. During the meeting, the CSO reviews the hazard and its consequence(s) and reviews available information distributed in the Safety Risk Assessment Package on severity and likelihood. The CSO may request support from members of the Safety Committee in obtaining additional information to support the safety risk assessment. Once sufficient information has been obtained, the CSO will facilitate completion of relevant sections of the Trend Analysis Log, using the Risk Assessment Matrix, with the Safety Committee. The CSO will document the Safety Committee’s safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Trend Analysis Log. The Safety Committee agendas, Safety Risk Assessment Packages, additional information collection, and completed Trend Analysis Log sections will be maintained on file by the CSO for a period of three years from the date of generation.

Safety Risk Mitigation

The Sunshine Bus Co. Accountable Executive and CSO review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards based on recommendations from the Safety Committee. We can reduce our safety risk by reducing the likelihood and/or severity of potential consequences of hazards. Prioritization of safety risk mitigations is based on the results of safety risk assessments. The Sunshine Bus Co. CSO tracks and updates safety risk mitigation information in the Trend Analysis Log and makes the Log available to the Safety Committee during quarterly meetings, and to staff upon request.

In the Trend Analysis Log, the CSO will also document any specific measures or activities, such as reviews, observations or audits that will be conducted to monitor the effectiveness of mitigations once implemented.

6. Safety Assurance

Safety Performance Monitoring and Measurement

These activities monitor the system for compliance with procedures for operations and maintenance.

Through our Safety Assurance process, the Sunshine Bus Co:

- Evaluates our compliance with operations and maintenance procedures to determine whether our existing rules and procedures are sufficient to control our safety risk,
- Assesses the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended,
- Investigates safety events to identify causal factors, and
- Analyzes information from safety reporting, including data about safety failures, defects, or conditions.

Additionally, we have many processes in place to monitor our entire transit system for compliance with operations and maintenance procedures, including:

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

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

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

The CSO monitors safety risk mitigations to determine if they have been implemented, and are effective, appropriate and working as intended. The CSO maintains a list of safety risk mitigations in the Trend Analysis Log.

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

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

The CSO and Safety Committee also monitor operations on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by:

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

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

<i>These activities are used to conduct investigations of safety events to identify causal factors.</i>	
<p>The Sunshine Bus Co. maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA; see definitions below) to find causal and contributing factors and review the existing mitigations in place at the time of the event. See the Safety Event Investigation Procedures for specific steps for conducting safety investigations. These procedures also reflect all traffic safety reporting and investigation requirements established by the Florida Department of Transportation.</p> <p>The CSO maintains all documentation of the investigation policies, processes, forms, checklists, activities, and results. As detailed in the Sunshine Bus Co. procedures, an investigation report is prepared and sent to the Safety Committee for integration into their analysis of the event. The Safety Committee determines if:</p> <ul style="list-style-type: none"> • The accident was preventable or non-preventable; • Personnel require discipline or retraining; • The causal factor(s) indicate that a safety hazard contributed to or was present during the event; and • The accident appears to involve underlying organizational causal factors beyond just individual employee behavior. 	
<i>These activities monitor information reported through internal safety reporting programs.</i>	
<p>The CSO and Safety Committee routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels, and when necessary, ensure that the concerns are investigated or analyzed through the Safety Risk Management process.</p> <p>The CSO and Safety Committee also review internal and external reviews, including audits and assessments, with findings concerning safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.</p>	

7. Safety Promotion

Competencies and Training	
<p>The Sunshine Bus Co.'s comprehensive safety training program applies to all employees directly responsible for safety, including:</p> <ul style="list-style-type: none"> • Vehicle Operators • Dispatchers • Maintenance Technicians • Managers and Supervisors • Agency Leadership and Executive Management • CSO • Accountable Executive 	

The Sunshine Bus Co. dedicates resources to conduct a comprehensive safety training program, as well as training on SMS roles and responsibilities. The scope of the safety training, including annual refresher training, is appropriate to each employee's individual safety-related job responsibilities and their role in the SMS.

Basic training requirements for employees, including frequencies and refresher training, are documented in the employee personnel files with Human Resources. Operations safety-related skill training includes the following:

- New-hire bus vehicle operator classroom and hands-on skill training,
- Bus vehicle operator refresher training,
- Bus vehicle operator retraining (recertification or return to work),
- Classroom and on-the-job training for dispatchers,
- Classroom and on-the-job training for operations supervisors and managers, and
- Accident investigation training for operations supervisors and managers.

Vehicle maintenance safety-related skill training includes the following:

- Ongoing vehicle maintenance technician skill training,
- Ongoing skill training for vehicle maintenance supervisors,
- Ongoing hazardous material training for vehicle maintenance technicians and supervisors, and
- Training provided by vendors.

The Accountable Executive and Executive Management team must complete FTA's SMS Awareness online training.

Safety Communication

These processes and activities communicate safety and safety performance information throughout the organization.

The CSO and Human Resources Coordinator coordinate the safety communication activities in the SMS. The activities focus on the three categories of communication activity established in Part 673:

• **Communicating safety and safety performance information throughout the agency:**

The Sunshine Bus Co. communicates information on safety and safety performance quarterly All-Staff Meetings, and has a permanent agenda item in all quarterly drivers' meetings. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may affect service or safety performance, and updates regarding SMS implementation. The CSO also solicits input from drivers during these meetings. Finally, the Human Resources Coordinator posts safety bulletins and flyers on the bulletin boards located in all bus operator and maintenance technician break rooms, advertising safety messages and promoting awareness of safety issues.

• **Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency:**

As part of new-hire training, HR distributes safety policies. Training is provided on these policies and procedures and are discussed during safety talks between supervisors and bus operators and vehicle technicians. For newly emerging issues or safety events at the agency, the CSO issues bulletins or messages to employees, which are reinforced by supervisors in one-on-one or group discussions with employees.

- **Informing employees of safety actions taken in response to reports submitted through an ESRP:**
The Sunshine Bus Co. provides targeted communications to inform employees of safety actions taken in response to reports submitted through the ESRP, including handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors.

Additional Information

Supporting Documentation

Reference documentation used to implement and carry out the Safety Plan that is not included elsewhere in this Plan.

The Sunshine Bus Co. will maintain documentation related to the implementation of its SMS; the programs, policies and procedures used to carry out this Agency Safety Plan, as well as the results from its SMS processes and activities for three years after creation. They will be available to the Federal Transit Administration or other Federal or oversight entity upon request.

Definitions of Special Terms Used in the Safety Plan

Term	Definition
Accident	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; at any location, at any time, whatever the cause.
Accountable Executive	A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
CSO	An adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A CSO may not serve in other operational or maintenance capacities, unless the CSO is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

Equivalent Authority	An entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.
Employee Safety Reporting Program (ESRP)	A system used to manage the data surrounding accidents and injuries in the workplace. Common elements reported include date, time, nature of the event, cause, injuries, name of the person injured, description of the event, location, witnesses, medical care required, and mitigation.
Event	Any accident, incident, or occurrence.
Hazard	Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
Incident	An event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency
Investigation	The process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
National Public Transportation Safety Plan	The plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
Occurrence	An Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
Operator	The operator of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302(14).
Performance Measure	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).
Performance Target	A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
Public Transportation Agency Safety Plan	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

Risk	The composite of predicted severity and likelihood of the potential effect of a hazard.
Risk Mitigation	A method or methods to eliminate or reduce the effects of hazards.
Safety Assurance	The processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
Safety Management Policy	A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
Safety Management System (SMS)	The formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
Safety Performance Target	Performance Target related to safety management activities.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
Safety Risk Assessment	The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety Risk Management	A process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Serious Injury	Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

Small Public Transportation Provider	A recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.
State of Good Repair	The condition in which a capital asset is able to operate at a full level of performance.
Transit Agency	An operator of a public transportation system
Transit Asset Management Plan	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.

List of Acronyms Used in this Safety Plan

Acronym	Word or Phrase
ASP	Agency Safety Plan
CAP	Corrective Action Plan
COA	Council on Aging
CEO	Chief Executive Officer
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
PTASP	Public Transportation Agency Safety Plan

SA	Safety Assurance	
SMP	Safety Management Policy	
SMS	Safety Management System	
SOP	Standard Operating Procedure	
SRM	Safety Risk Management	

Attachment A

Risk Assessment Matrix				
	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	Undesirable	Undesirable	Undesirable	Acceptable with reservation
Probable (B)	Undesirable	Undesirable	Undesirable	Acceptable with reservation
Occasional (C)	Undesirable	Undesirable	Undesirable	Acceptable with reservation
Remote (D)	Undesirable	Undesirable	Acceptable with reservation	Acceptable with reservation
Improbable (E)	Acceptable with reservation	Acceptable with reservation	Acceptable with reservation	Acceptable with reservation

Attachment B Resolution

Attachment C Public Notice