

Lower Rio Grande Valley Development Council Valley Metro



Public Transportation Agency Safety Plan

Version 3

Purposed board approval: ~~December 13, 2023~~

December 11, 2024

In compliance with 49 CFR Part 673

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1. EXECUTIVE SUMMARY

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

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

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

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. At Valley Metro, all levels of management, administration and operations are responsible for the safety of their clientele and themselves. To improve public transportation safety to the highest practicable level in the State of Texas and comply with FTA requirements, the Texas Department of Transportation (TxDOT) has developed this Agency Safety Plan (ASP) in collaboration with the Rio Grande Valley Metropolitan Planning Organization (MPO), and the Lower Rio Grande Valley Development Council (LRGVDC), dba Valley Metro.

To ensure that the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the NSP, LRGVDC, on behalf of Valley Metro, adopts this ASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP), per 49 U.S.C. 5329(d)(1)(A).¹ While safety has always been a primary function at Valley Metro, this document lays out a process to fully implement an SMS over the next several years that complies with the PTASP final rule.

A. Plan Adoption – 673.11(a)(1)

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

¹ Federal Register, Vol. 81, No. 24

Tom Logan, Account Executive Director of Lower Rio Grande Valley Development Council – Valley Metro

Tom Logan, Accountable Executive Director Signature

DATE

Since Valley Metro is considered a department of the LRGVDC, the main governing body is the LRGVDC Board of Directors. Approval of this plan by the LRGVDC occurred on, December 13, 2023, and is documented in the attached resolution from the Board Meeting.

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

TxDOT certifies on, ~~December 13, 2023~~ **December 11, 2024**, that this Agency Safety Plan is in full compliance with 49 CFR Part 673 and has been adopted and will be implemented by Valley Metro as evidenced by the plan adoption signature and necessary Board approvals under Section 1.A of this plan.

2. TRANSIT AGENCY INFORMATION – 673.23(D)

The LRGVDC – Valley Metro provides public transportation in urbanized and non-urbanized areas of the lower Rio Grande Valley through our transit department, Valley Metro. The LRGVDC main office is located at 301 W. Railroad St., Weslaco, TX 78596, and the Valley Metro Transit Center is located at 510 S. Pleasantview Drive, Weslaco, TX 78596.

Valley Metro currently operates twenty – ~~seven~~ ~~five (25)~~ (27) flex routes, four (4) demand response, ~~five (5) micro-transit/fast ride (uber service)~~, and three (3) fixed routes. Flexed route service operates in Hidalgo County, Cameron County, and Starr County, weekday demand response service operates in Willacy County from 7:00 am to 4:00 ~~7:00~~ pm, ~~MicroTransit Fast Ride from 8:00 a.m. – 5:00 p.m.~~, Starr County from 7:00 am to 4:7:00 pm, and Zapata County from 7:00 p.m. to 4:7:00 p.m. Since Valley Metro is considered a department of the LRGVDC, the agency is managed by the LRGVDC Director of Regional Transit and the management team consisting of the Program Supervisor II - IV – Maintenance, Operations & Planning, the Program Specialist II-Risk, and Chief Safety Officer (CSO)/Safety.

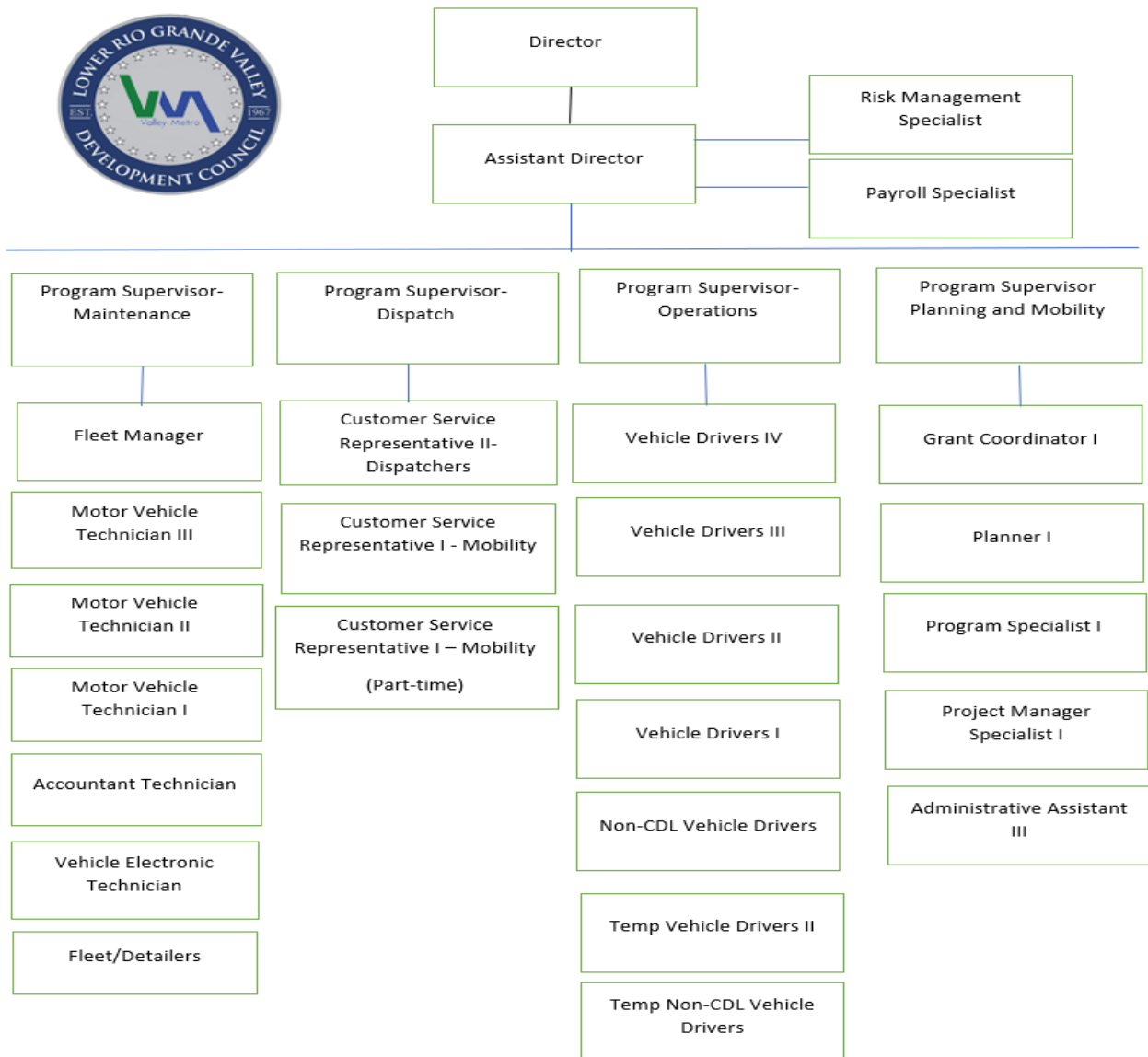
No additional transit service is provided by Valley Metro on behalf of another transit agency or entity at the time of the development of this plan.

Table 1 contains agency information while an organizational chart for Valley Metro is provided in Figure 1. Table 1: Agency Information

Information Type	Information
Full Transit Agency Name	Lower Rio Grande Valley Development Council Valley Metro
Transit Agency Address	510 S. Pleasant View Drive Weslaco, Texas
Name and Title of Accountable Executive 673.23(d)(1)	Tom Logan, Director of Regional Transit (Valley Metro)
Name of Chief Safety Officer or SMS Executive 673.23(d)(2)	Dora Cruz, Program Specialist II – Risk Mgt.
Key Staff	Program Supervisor II-VI – Operations, Maintenance, and Planning
Key Staff	Program Supervisor II -IV, Operations, Maintenance, and Planning
Mode(s) of Service Covered by This Plan 673.11(b)	Fixed/Flex Route Bus & Demand Response
List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5310, 5311, 5311f, 5339, and 5339b
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	MB, and Demand Response
Number of Vehicles Operated	76

FIGURE 1: VALLEY METRO ORGANIZATIONAL CHART –

LRGVDC – Valley Metro Organizational Chart



A. Authorities & Responsibilities – 673.23(d)

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

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

Agency leadership and executive management are those members of our agency leadership or executive management, other than the Accountable Executive, CSO/SMS Executive, who have authority or responsibility for day-to-day implementation and operation of our agency's SMS.

The **(CSO) Chief Safety Officer** is an adequately trained individual who has the authority and responsibility as designated by the Accountable Executive for the day-to-day implementation and operation of the Valley Metro SMS. As such, the CSO is able to report directly to our transit agency's Accountable Executive.

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

In compliance with the IIJA and FTA's Dear Colleague Letter, dated Feb 2022, LRGVDC has established a safety committee consisting of an equal number of frontline and managerial employees. The safety committee shall; consist of an equal number of frontline employee representatives, of the frontline workforce employed by the recipient or management representatives; and have, at a minimum, responsibility for- identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment; identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and identifying safety deficiencies for purposes of continuous improvement. The safety committee shall review and approve the PTASP prior to Board approval.

To address the safety risks associated with transit worker assaults, in alignment with the FTA's General Directive, the following measures will be integrated into our Agency Safety Plan (ASP) in compliance with 49 CFR part 673:

1. Safety Risk Assessment:

- Conduct a safety risk assessment related to transit worker assaults using Safety Risk Management (SRM) processes as required by 49 CFR § 673.25(c).
- If a safety risk assessment has been completed in the prior 12 months, this requirement is deemed fulfilled.

2. Risk Mitigation:

- Identify and implement safety risk mitigations or strategies to reduce the likelihood and severity of assaults, as required by 49 CFR § 673.25(d).

- Recommendations will be developed in collaboration with the joint labor-management Safety Committee for agencies serving urbanized areas with populations of 200,000 or more, per 49 U.S.C. 5329(d)(5).
- 3. **Monitoring and Reporting:**
 - Monitor the effectiveness of implemented safety risk mitigations and provide updates to the FTA as required.

These updates ensure compliance with the FTA's directive while prioritizing the safety and well-being of transit workers.

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

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

3. SAFETY POLICIES AND PROCEDURES

A. Policy Statement – 673.23(a)

Safety is Valley Metro's first priority. Valley Metro is committed to implementing, developing, and improving strategies, management systems, and processes to ensure that all our activities uphold the highest level of safety performance and meet required safety standards.

We will develop and embed a safety culture in all our activities that recognizes the importance and value of effective safety management and acknowledges at all times that safety is paramount.

We will clearly explain to all staff their accountabilities and responsibilities for the development and operation of the Safety Management System.

For passengers and employees, we will minimize the safety risk associated with transit service to as low as reasonably practicable and we will work to comply with and, wherever possible, exceed legislative and regulatory requirements and standards. We also will work to ensure that all employees are provided with adequate and appropriate safety information and training, are competent in safety matters, and are only allocated tasks commensurate with their skills.

We have established Safety Performance Targets (SPT) to help us measure the overall effectiveness of our processes and ensure we meet our safety objectives. We will issue quarterly reports to the entire organization documenting how well we met our safety performance targets and describing the safety risk mitigations we implemented to reduce safety risk.

I. Employee Safety Reporting Program – 673.23(b) –

Frontline employees are a significant source of safety data. These employees are typically the first to spot unsafe conditions that arise from unplanned conditions either on the vehicles, in the maintenance shop, or in the field during operations. For this reason, the Employee Safety Reporting Program (ESRP) is

a major tenet of the PTASP Rule. Under this rule, agencies must establish and implement a process that allows employees to report safety conditions directly to senior management; provides protections for employees who report safety conditions to senior management; and includes a description of employee behaviors that may result in disciplinary action.

Valley Metro has a policy in place called the *LRGVDC Personnel Policy Manual* (Appendix A, Table 8 shows the document name, file name, and date of adoption). In Section 3.05 Workplace Safety, each employee of LRGVDC shall be responsible to perform and observe safety standards relevant to job function. Employees are expected to exercise reasonable care for themselves and others while on duty. Further to this, the Operating Policy and Procedures Manual (Appendix A) provides Valley Metro with appropriate disciplinary actions. Every year, Valley Metro will review and modify, if necessary, our LRGVDC Personnel Policy Manual to develop the procedure into a full ESRP to ensure that the procedure complies with 49 CFR Part 673.

The *Whistle Blower Policy* is formulated to provide the opportunity to employees to access the LRGVDC Executive Committee in good faith in case they observe unethical and improper practices or any other wrongful conduct in the organization and to prohibit managerial personnel from taking any adverse personnel action against those employees. The (COG) Council of Governments complies with the Texas Whistleblowers Act which states "a state or local governmental entity may not suspend or terminate the employment of, or take other adverse personnel action against, a public employee who in good faith reports a violation of the law by the employing governmental entity or another public employee to an appropriate law enforcement authority." Texas Government Code Ann. §554.002

In general, the Valley Metro Employee Safety Reporting Program will ensure that all employees are encouraged to report safety conditions directly to senior management or their direct supervisor for elevation to senior management. The policy will include any contract employees. The policy will also spell out what protections are afforded employees who report safety related conditions and will describe employee behaviors that are not covered by those protections. The policy will also elaborate on how safety conditions that are reported will be reported back to the initiator(s) – either to the individual or groups of individuals or organization, dependent on the nature of the safety condition.

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

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

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

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

B. PTASP Development and Coordination with TxDOT – 673.11(d)

This PTASP has been developed by the Texas Department of Transportation on behalf of the Rio Grande Valley MPO and the Lower Rio Grande Valley Development Council - Valley Metro, in accordance with all requirements stated in 49 CFR Part 673 applicable to a small public transportation provider. TxDOT mailed a formal call for participation in a State sponsored PTASP development process to all Texas Section 5307 small bus transit agencies on January 15, 2019, and followed that call with a series of phone calls and additional correspondence. Valley Metro provided a letter to TxDOT opting into participation on March 15, 2019, and has been an active participant in the development of this plan through sharing existing documentation and participating in communication and coordination throughout the development of this plan. The Valley Metro documentation used in the development of this plan is presented in Table 8, in Appendix A.

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

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

The draft ASP was delivered to Valley Metro in March 2020 for review and comment. Once review was completed and any adjustments made, the final was delivered to Valley Metro for review and adoption.

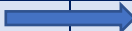




C. PTASP Annual Review – 673.11(a)(5)

Per 49 U.S.C. 5329(d)(1)(D), this plan includes provisions for annual updates of the SMS. As part of Valley Metro's ongoing commitment to fully implementing SMS and engaging our agency employees in developing a robust safety culture, Valley Metro will review the ASP and all supporting documentation annually. The review will be conducted as a precursor to certifying to FTA that the ASP is fully compliant with 49 CFR Part 673 and accurately reflects the agency's current implementation status. Certification will be accomplished through LRGVDC's annual Certifications and Assurances reporting to FTA.

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

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

TABLE 2: ASP ANNUAL UPDATE TIMELINE

Task	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept
Review Agency Operations								
Review SMS Documentation <ul style="list-style-type: none"> • <i>Safety Policy;</i> • <i>Risk Management;</i> • <i>Safety Assurance; and</i> • <i>Safety Promotion.</i> 								
Review Previous Targets and Set or Continue Targets								
Report Targets to National Transit Database (NTD), TxDOT, Rio Grande Valley MPO								
Make Any Necessary Adjustments to PTASP								
Update Version No., Adopt & Certify Plan Compliance								★

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

TABLE 3: ASP RECORD OF CHANGES

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Public Transit Agency Safety Plan – Version 2	Annual Review – 673.11 (a)(5)	Valley Metro ongoing commitment to fully implement and engage in developing a safety culture.	Maribel Contreras & Dora Cruz	August 31, 2022
Public Transit Agency Safety Plan – Version 3	<ul style="list-style-type: none"> Page 4. Revise new Accountable Executive from Maribel Contreras to Tom Logan Page 11. Annual Review – 673.11 (a)(5) Page 6 & 7. Transit Agency Information Organizational Chart Safety Risk Mitigation, Bipartisan Infrastructure Law requirements. Table 5 - Safety Performance Targets Page 35 Appendix C 	Valley Metro ongoing commitment to fully implement and engage in developing a safety culture. Organizational Chart Updated Safety Performance Targets Implementation of the Infectious disease exposure	Tom Logan & Dora Cruz	December 13, 2023
Public Transit Agency Safety Plan – Version 4	<ul style="list-style-type: none"> Annual Review – 673.11 (a)(5) FTA’s Required Action Regarding Assaults on Transit Workers Table 5 – SPT 	Valley Metro’s ongoing commitment to fully implement and engage in developing a safety culture. 49 CFR § 673.25(c)	Dora Cruz	December 11, 2024

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

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

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

E. PTASP Documentation and Recordkeeping – 673.31

At all times, Valley Metro will maintain documents that set forth our ASP, including those documents related to the implementation of Valley Metro’s SMS and those documents related to the results from SMS processes and activities. Valley Metro will also maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that our agency uses to carry out our

ASP and all iterations of those documents. These documents will be made available upon request to the FTA, other Federal entity, or TxDOT. Valley Metro will maintain these documents for a minimum of three years after the documents are created. These additional supporting documents are cataloged in Appendix A and the list will be kept current as a part of the annual ASP review and update.

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

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

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

TABLE 4: NSP SAFETY PERFORMANCE MEASURES

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

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

TABLE 5: BASELINE 2023 SAFETY PERFORMANCE MEASURES

Mode	Fatalities		Rate of Fatalities*		Injuries	Rate of Injuries*	Safety Events	Rate of Safety Events*	Mean Distance Between Major Mechanical Failure
Flexed Route (Bus)	0		0.00000%		3.0	0.00017%	3.0	0.00017%	164,490
Demand Response	0		0.00000%		1.0	0.00087%	1.0	0.00087%	115,079

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

While safety has always been a major component of the Valley Metro operation, the adoption of this ASP will result in changes across all aspects of the organization. The SPTs set in Table 6 and Table 7 reflect an acknowledgment that SMS implementation will produce new information that will be needed to accurately set meaningful SPTs. We will set our targets at the current NTD reported five-year average as we begin the process of fully implementing our SMS and developing our targeted safety

improvements. This will ensure that we do no worse than our baseline performance over the last five years.

TABLE 6: FLEXED ROUTE (BUS) SAFETY PERFORMANCE TARGETS

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities*	0.00000%	0.00000%
Injuries	2.8	2.6
Rate of Injuries*	0.00018%	0.00017%
Safety Events	2.8	2.6
Rate of Safety Events*	0.00018%	0.00017%
Mean Distance Between Major Mechanical Failure	573,799	58,419

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

TABLE 7: DEMAND RESPONSE SAFETY PERFORMANCE TARGETS

Mode	Baseline	Target
Fatalities	0.0	0.0
Rate of Fatalities*	0.00000%	0.00000%
Injuries	2.2	.04
Rate of Injuries*	0.00014%	0.00008%
Safety Events	1.4	.04
Rate of Safety Events*	0.00009%	0.00008%
System Reliability	100,181	47,397
Other	0	0

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

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

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

Valley Metro will make our SPTs available to TxDOT and the Rio Grande Valley MPO to aid in those agencies' respective regional and long-range planning processes. To the maximum extent practicable, Valley Metro will coordinate with TxDOT and the Rio Grande Valley MPO in the selection of State and MPO SPTs as documented in the Interagency Memorandum of Understanding (MOU).

Each year during the FTA Certifications and Assurances reporting process, LRGVDC will transmit any updates to our SPTs to both the Lower Rio Grande Valley MPO and TxDOT (unless those agencies specify another time in writing).

4. SAFETY MANAGEMENT SYSTEMS – 673 SUBPART C

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

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

FIGURE 2: SAFETY MANAGEMENT SYSTEMS



Implementing SMS at Valley Metro will be a major undertaking over the next several years. This ASP is the first step to putting in place a systematic approach to managing the agency's risk. Valley Metro has already taken several steps to implement SMS, such as developing this initial ASP and designating a (CSO) Chief Safety Officer. During the first year of implementation, Valley Metro will identify SMS roles

and responsibilities, key stakeholder groups and key staff to support this process. Valley Metro will also ensure that these key staff receive SMS training, develop a plan for implementing SMS, inform stakeholders about the ASP, and discuss our progress with the LRGVDC Board and our planning partners.

A. Safety Risk Management – 673.25

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

FIGURE 3: SAFETY RISK MANAGEMENT PROCESS



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

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

FIGURE 4: DRAFT RISK REGISTER

Hazard	Type	Likelihood	Consequence	Resolution

What is wrong?

What could happen

What could mitigate this?

As the SRM process progresses through the steps of identifying what may be wrong, what could happen as a result, and what steps Valley Metro is taking to resolve the risk and mitigate the hazard, the Chief Safety Officer completes and publishes the various components of the Risk Register. These components include the use of safety hazard identification, safety risk assessment, and safety risk mitigation, as described in the following sections.

I. Safety Hazard Identification – 673.25(b)

Valley Metro’s *Transit Services Safety Plan* (Appendix A) is in place to identify safety and operational risks based on individual assets. The safety procedures provide identification methods for the following categories: operational safety, preventive maintenance, maintenance plan, the maintenance filing system, pre-trip/post-trip daily inspections, emergency procedures, accidents and breakdowns, evacuating the bus, fire or danger of fire, safety parking, evaluating injuries, contracting dispatch personnel, road calls, wheelchair lift inspection report, and safety equipment.

Although the current procedures have been effective in achieving our safety objectives, to ensure compliance with 49 CFR Part 673, Valley Metro is working to implement the following expanded SRM process.

The Valley Metro SRM process is a forward-looking effort to identify safety hazards that could potentially result in negative safety outcomes. In the SRM process, a hazard is any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infra-structure of a public transportation system; or damage to the environment.

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

- Through training and reporting procedures, Valley Metro ensures personnel can identify hazards and that each employee clearly understands that the employee has a responsibility to immediately report any safety hazards identified to the employee's supervisors. Continued training helps employees to develop and improve the skills needed to identify hazards.
- Employee hazard training coupled with the Employee Safety Reporting Program ensures that Valley Metro has full use of information from frontline employees for hazard identification.
- Upon receiving the hazard report, supervisors communicate the identified hazard to the CSO for entry into the risk register for risk assessment, classification, and possible mitigation.
- In carrying out the risk assessment, the CSO uses standard reporting forms (e.g., *Pre-and Post-Trip Inspection Forms & Incident and Accident Reports* to mitigate mechanical based safety hazards that are identified) and other reports completed on a routine basis by administrative, operations and maintenance. The Valley Metro *Transit Services Safety Plan (Appendix A)* contains procedures for flagging and reporting hazards as a part of day-to-day operations.
- Program Supervisors are responsible for performing and documenting regular safety assessments, which include reporting and recommending methods to reduce identified hazards.
- Valley Metro uses incident reports and records to determine specific areas of training that need to be covered with employees to ensure safety hazard identification is continually improved, and thus ensure that hazards are identified before an event recurrence.
- Incident reports are also analyzed by the risk management team to identify any recurring patterns or themes that would help to identify underlying hazards and root causes of the event that can be mitigated to prevent recurrence.
- If a hazard is such that an employee would be reluctant to report the information due to perceived negative consequences (e.g., disciplinary action), alternative, anonymous reporting mechanisms are available through an anonymous suggestion box or anonymous online reporting form, or other secure mechanism.
- To increase the safety knowledge of our agency, the CSO, management personnel and subject matter experts are also encouraged to participate in available professional development activities and peer-to-peer exchanges as a source of expertise and information on lessons learned and best practices in hazard identification.
- Other sources for hazard identification include:
 - Employee Safety Reporting Program
 - Inspections of personnel job performance, vehicles, facilities, and other data
 - Investigations of safety events
 - Safety trend analysis on data currently collected
 - Training and evaluation records
 - Internal safety audits
 - External sources of hazard information could include:

- FTA and other federal or state authorities
- Reports from the public
- Safety bulletins from manufacturers or industry associations

In addition to identifying the hazard, the hazard identification process also classifies the hazard by type (organizational, technical, or environmental) to assist the CSO in identifying the optimal combination of departmental leadership and subject matter expertise to select in assembling the safety risk assessment team.

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

II. Safety Risk Assessment – 673.25(c)

As part of the new SRM process, Valley Metro has developed methods to assess the likelihood and severity of the consequences of identified hazards, and prioritizes the hazards based on the safety risk. The process continues the use of the Risk Register described in the previous section to address the next two components.

To accurately assess a risk, Valley Metro may need to perform an investigation. Valley Metro currently investigates accidents or crashes but will need to develop a full investigation procedure to inform the SRM process. The investigation procedure will start with the framework found in the *Maintenance Plan's Maintenance Filing System* (Appendix A) and will be developed to cover all risk assessment. Once fully developed, the document will become the Investigation SOP. The SOP will include accident investigation procedures as well as risk investigation procedures. These procedures will be used to investigate risks identified from multiple sources including ESRP.

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

FIGURE 5: SAFETY RISK ASSESSMENT STEPS IN POPULATING THE RISK REGISTER

Hazard	Type	Likelihood	Consequence	Resolution

The risk assessment is conducted by the CSO and their management team through the safety compliance committee supplemented by subject matter experts from the respective department or section to which the risk applies. The process employs a safety risk matrix, similar to the one presented in Figure 6, that allows the safety team to visualize the assessed likelihood and severity, and to help decision-makers understand when actions are necessary to reduce or mitigate safety risk.

FIGURE 6: SAFETY RISK ASSESSMENT MATRIX

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

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

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

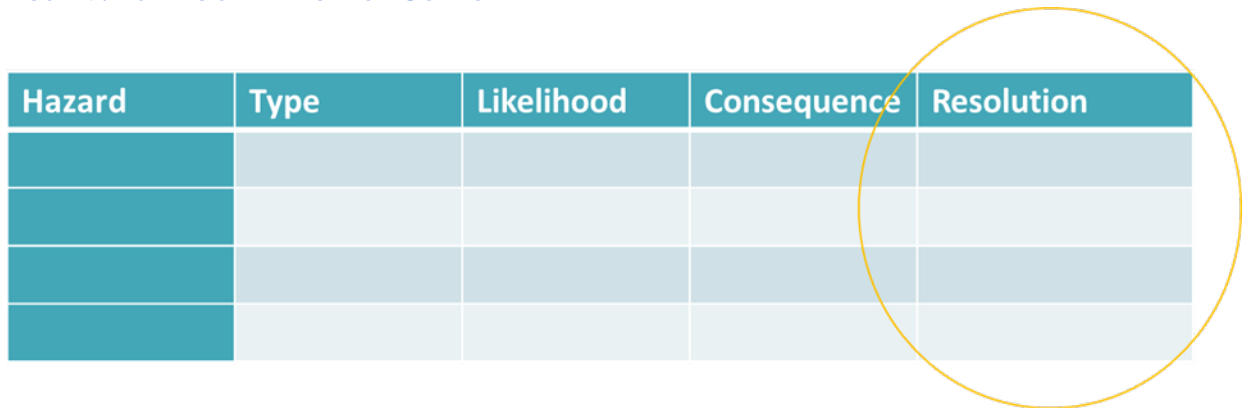
determined to be acceptable, but monitoring is necessary. If the risk falls within one of the green zones, the risk is acceptable under the existing circumstances.

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

III. Safety Risk Mitigation – 673.25(d)

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

FIGURE 7: RISK REGISTER MITIGATION COMPONENT



Hazard	Type	Likelihood	Consequence	Resolution

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

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

Once a mitigation strategy is selected and adopted, the strategy is assigned to an appropriate staff member or team for implementation. The assigned personnel and the personnel's specific responsibilities are entered into the Risk Register. Among the responsibilities of the mitigation team leader is the documentation of the mitigation effort, including whether the mitigation was carried out as designed and whether the intended safety objectives were achieved. This information is recorded in the appendix to the Risk Register for use in subsequent SA activities and to monitor the effectiveness of the SRM program.

The Bipartisan Infrastructure Law requires transit agencies to address strategies to minimize infectious diseases, consistent with CDC and Prevention or State health authority guidelines. LRGVDC – Valley Metro has strategies in place to minimize exposure to infectious diseases that are consistent with CDC state/county orders, and public health agencies, LRGVDC – Valley Metro developed safety protocols which employees are encouraged to follow and procedures and checklist to be used to mitigate risk. A copy of the plan is provided in Appendix C of this document.

B. Safety Assurance – 673.27 (a)

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

SA helps to ensure early identification of potential safety issues. SA also ensures that safeguards are in place and are effective in meeting Valley Metro’s critical safety objectives and contribute towards SPTs.

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

As the first step in the Valley Metro SA program, Valley Metro collects and monitors data on safety performance indicators through a variety of mechanisms described in the following sections. Safety performance indicators can provide early warning signs about safety risks. Valley Metro currently relies primarily on lagging indicators representing negative safety outcomes that should be avoided or mitigated in the future. However, initiatives are underway to adopt a more robust set of leading indicators that monitor conditions that are likely to contribute to negative outcomes in the future. In addition to the day-to-day monitoring and investigation procedures detailed below, Valley Metro will review and document the safety performance monitoring and measuring processes as part of the annual update of this ASP.

MONITORING COMPLIANCE AND SUFFICIENCY OF PROCEDURES – 673.27 (B)(1)

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

Supervisors monitor employee compliance with Valley Metro SOPs through direct observation and review of information from internal reporting systems from both employees and customers.

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

Sometimes personnel are fully complying with the procedures, but the operations and maintenance procedures are inadequate and pose the risk of negative safety outcomes. In this case, the cognizant person submits the deficiency or description of the inadequate procedures to the SRM process. Through

the SRM process, the SRM team will then evaluate and analyze the potential organizational hazard and assign the identified hazard for mitigation and resolution, as appropriate. The SRM team will also conduct periodic self-evaluation and mitigation of any identified deficiencies in the SRM process itself.

MONITORING OPERATIONS – 673.27(B)(2)

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

II. Safety Event Investigation – 673.27(B)(3)

Valley Metro currently conducts investigations of safety events. From an SA perspective, the objective of the investigation is to identify causal factors of the event and to identify actionable strategies that Valley Metro can employ to address any identifiable organizational, technical, or environmental hazard at the root cause of the safety event.

Safety Event Investigations that seek to identify and document the root cause of an accident or other safety event are a critical component of the SA process because they are a primary resource for the collection, measurement, analysis, and assessment of information. Valley Metro gathers a variety of information for identifying and documenting root causes of accidents and incidents, including but not limited to:

1. Obtain from the Operator the following information:
 - a. The location of the incident and what direction they were traveling (inbound or outbound); if in station, indicate the situation.
 - b. The bus number and the route that they are on.
 - c. If there are injuries, describe how serious they appear (don't be too graphic, just generalize).
 - d. Provide information about any other vehicles or pedestrians involved and their descriptions.
2. Remind the operator of the safety procedures:
 - a. Turn on 4-way flashers. Place traffic warning devices (orange triangles).
 - b. Recheck anyone with injuries, do not move the seriously injured.
 - c. Render comfort and aid to anyone injured, as may be appropriate.
 - d. Evacuate the bus, if necessary.
 - e. Keep the two-way radio on and monitored.
 - f. Hand out courtesy cards to the passengers and to any witnesses.
 - g. Move the vehicle to the side of the road unless it is inoperable.
3. Notify the following:
 - a. Call the Police. Call Emergency Medical Personnel (EMP) 911
 - b. Notify/call the immediate supervisor on duty at the time.

4. The supervisor will:
 - a. Is responsible for notifying the **Director or Regional Transit Services** ~~LRGVDC Director of Human Resources/or Executive Director's designee for filing a written accident report immediately with the Executive Director.~~
 - b. Failure to report an on-the-job injury, no matter how minor, is grounds for disciplinary action.
 - c. Determine whether the **Director** ~~General Manager or Assistant General Manager~~ needs to be contacted but will give them a report when the supervisor finishes the initial assessment.
 - d. Let the Operator know that Police and supervision have been contacted and help and is on the way.
 - e. Assign a Standby Operator to pre-trip a bus in case a standby must drive the next round for the operator on that route. When needed, the Standby Operator may take a bus out to continue on a route.
 - f. Let the Operator know that a Standby Operator and bus have been assigned to continue the route or that support personnel are bringing another bus out to them.
 - g. Refer the operator for required drug and alcohol testing in compliance with 49 CFR § 655.44 post-accident testing, if the safety event meets the definition of accident in 49 CFR § 655.4.
 - h. Record all accident information on the Daily Dispatch log, any missed trips, downtime, or bus change outs.
5. Dispatcher on duty will give the Operator an incident report to complete before the Operator leaves that day. The dispatcher will put the Operator's report in the Chief Safety Officer's box.
6. The CSO, working with subject matter experts, evaluates the incident report and other available information to determine the root cause of the accident/event. Following up with driver or other cognizant parties may be necessary to elicit additional information.
7. The CSO identifies any hazards noted in the incident report and refers those hazards to the SRM process.

MONITORING INTERNAL SAFETY REPORTING PROGRAMS – 673.27(B)(4)

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

OTHER SAFETY ASSURANCE INITIATIVES

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

C. Safety Promotion – 673.29

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

I. Safety Competencies and Training – 673.29(a)

Valley Metro provides comprehensive training to all employees regarding each employee's job duties and general responsibilities. This training includes safety responsibilities related to the employee's position. In addition, regular driver safety meetings are held to ensure that safety related information is relayed to the key members of our agency's safety processes.

As part of SMS implementation, Valley Metro will be conducting the following activities:

- Conduct a thorough review of all current general staff categories (administrative, driver, supervisor, mechanic, maintenance, etc.) and the respective staff safety related responsibilities.
- Assess the training requirements spelled out in 49 CFR Part 672 and the various courses required for different positions. (Valley Metro is not subject to the requirements under 49 CFR Part 672 but will review the training requirements to understand what training is being required of other larger agencies in the event these trainings might be useful).
- Assess the training material available on the FTA PTASP Technical Assistance Center website.
- Review other training material available from industry sources such as the Community Transportation Association of America and the American Public Transportation Association websites.
- Develop a set of competencies and training required to meet the safety related activities for each general staff category.
- Develop expectations for ongoing safety training and safety meeting attendance.
- Develop a training matrix to track progress of individuals and groups within the organization.
- Adjust job notices associated with general staff categories to ensure that new personnel understand the safety related competencies and training needs and the safety related responsibilities of the job.
- Include refresher training in all training courses and apply it to agency personnel and contractors.

II. Safety Communication – 673.29(b)

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

Valley Metro reports any safety related information to the **Director and Supervisors** ~~LRGVDC Board~~ at their regular meetings and will begin including safety performance information. In addition, Valley Metro holds regularly scheduled meetings with drivers to ensure that any safety-related information is passed along that would affect the execution of the drivers' duties. Valley Metro also posts safety related and other pertinent information in the common room for all employees.

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

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

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

5. APPENDIX A

TABLE 8: PTASP SUPPORTING DOCUMENTS

File Name	Revision Date	Document Name	Document Owner
DOC082119-001.pdf	7/29/2004 (Safety Plan)	Transit Services Safety Plan	LRGVDC
		TAM Plan	LRGVDC
		SRTP (placeholder)	LRGVDC
		LRTP (placeholder)	LRGVDC
		Transit Development Plan (placeholder)	LRGVDC
	7/27/2016 (Transit Service Policy)	Transit Service Policy	LRGVDC
		Service Standard Guidelines	LRGVDC
		Training Program	LRGVDC
DOC082119-002.pdf		Appendices to the Personnel Policy Manual	LRGVDC
DOC082119-003.pdf	3/27/2013 3/2023	LRGVDC Personnel Policy Manual	LRGVDC
DOC082119-004.pdf	12-11-2024	Operation Procedures	LRGVDC
DOC082119-005.pdf	5/24/2017	LRGVDC Transit Services Department Maintenance Program Vehicle Maintenance Policy and Facility Maintenance Plan	LRGVDC
DOC082119-006.pdf	2/1/2017	Lower Rio Grande Valley Development Council Procurement Policy	LRGVDC
DOC082119-007.pdf		Appendices Including: Appendix B-2 Appendix C	LRGVDC
DOC111419.pdf		Attachment - A LRGVDC Building Maintenance	LRGVDC

A. Glossary of Terms

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

Accountable Executive (typically the highest executive in the agency): means a single, identifiable person who has ultimate responsibility for carrying out the SMS of a public transportation agency, and control or direction over the human and capital resources needed to develop and maintain both the

agency's PTASP, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

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

Chief Safety Officer (CSO): means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A CSO may not serve in other operational or maintenance capacity, unless the CSO is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

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

Equivalent Authority: means an entity that carries out duties 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 PTASP.

Event: means an accident, incident, or occurrence.

Federal Transit Administration (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 a public transportation system; or damage to the environment.

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

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

Key staff: means a group of staff or committees to support the Accountable Executive, CSO, or SMS Executive in developing, implementing, and operating the agency's SMS.

Major Mechanical Failures: means failures caused by vehicle malfunctions or subpar vehicle condition which requires that the vehicle be pulled from service.

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

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

Operator of a Public Transportation System: means a provider of public transportation as defined under 49 U.S.C. 5302(14).

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

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

Performance Target: means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.

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

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

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

Risk Mitigation: means a method or methods to eliminate or reduce the effects of hazards.

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

Safety Assurance (SA): means the process within a transit agency's SMS that functions to ensure the implementation and effectiveness of safety risk mitigation and ensures that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Management Policy (SMP): means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of the agency's employees regarding safety.

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

Safety Management System (SMS) Executive: means a CSO or an equivalent.

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

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

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

Safety 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.

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

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

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

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

Safety Risk Assessment: means the formal activity whereby a transit agency determines SRM priorities by establishing the significance or value of its safety risks.

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

Safety Risk Mitigation: means the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards.

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

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

Serious Injury: means any injury which:

- Requires hospitalization for more than 48 hours, commencing within seven days from the date that the injury was received.
- Results in a fracture of any bone (except simple fractures of fingers, toes, or nose).
- Causes severe hemorrhages, nerve, muscle, or tendon damage.
- Involves any internal organ; or
- Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

Small Public Transportation Provider: means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

State: means a State of the United States, the District of Columbia, or the Territories of Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

State of Good Repair: means the condition in which a capital asset is able to operate at a full level of performance.

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

Transit Agency: means an operator of a public transportation system.

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

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

B. Additional Acronyms Used

ASP: Agency Safety Plan

dba: doing business as

EMP: Emergency Medical Personnel

ESRP: Employee Safety Reporting Program

FAST Act: Fixing America's Surface Transportation Act

LRGVDC: Lower Rio Grande Valley Development Council

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

MOU: Memorandum of Understanding

MPO: Metropolitan Planning Organization

NTD: National Transit Database

SOP: Standard Operating Procedure

TxDOT: Texas Department of Transportation

6. APPENDIX B

A. Board Minutes or Resolution

Place here

7. APPENDIX C

A. Infectious Disease Exposure Response Plan

Contagious Virus Response Plan

1. Approval of a Contagious Virus Response Plan (CVRP)

The CSO or other pertinent executive manager of the transit agency shall define the process for approval of the initial CVRP, periodic reviews of the CVRP and revisions to the CVRP. People with authority to revise the CVRP shall be clearly identified.

2. Elements of a CVRP

The CVRP should cover only elements specific to a contagious virus that are outside the scope of any other agency all-hazards response plans. These specific elements include the following:

- identification of alert phases that trigger specific action.
- information and education program
- disinfection program
- sanitary aids to limit spread.
- vaccine/antiviral medications
- service reduction, shutdown, and restoration

2.1 Identification of alert phases that trigger specific action.

Planning and response to a contagious virus will depend on the risk involved. Unlike a catastrophic event such as an earthquake, a contagious virus likely will have various phases in the lifecycle of its spread. Each phase will likely need a different response strategy. For example, one phase might be the presence of unfounded fears and concern regarding a certain virus, and the response might call for education and public awareness regarding the low risk involved. Another phase, however, may be the onset of a full pandemic, which calls for extreme measures to limit its spread.

The CVRP shall be applicable to all contagious viruses however it is based on the phases and sub-phases of a pandemic influenza as defined by the World Health Organization (WHO). Table such as in the Appendices is beneficial to identify the phases and sub-phases.

The World Health Organization (WHO) has identified six pandemic influenza alert phases. These WHO phases have been universally accepted by most health departments and other government and private organizations and shall be adopted and adapted by the transit agency. An example of a table listing phases and sub-phases is shown in Appendix A.

2.2 Information and education program

Communications, in the form of information and educational programs, must be a major part of any CVRP. Communications shall be divided into three distinct areas: communications with emergency

management; communications to employees (internal) and communications to the riding public (external).

Communications need to be coordinated with local and state emergency management so that the message stays consistent. Transit assets availability also needs to be communicated to emergency management as the availability changes will affect their response plans.

Response tasks shall be identified as a function of the various sub-phases discussed in Section 2.1 above. As a subphase of the virus is reached, the agency shall perform identified tasks. Responsibility for each task to be performed shall be clearly identified in the plan.

Information and educational training shall be consistent with that recommended by local and state health departments, and transit agency staff shall partner with those agencies to ensure that accurate and appropriate information is being released. An example listing internal information and education responses to different alert phases is shown as Appendix B, and an example listing external information and education responses is shown as Appendix C.

2.3 Disinfection program

Various contagious viruses can survive on surface materials for several days or longer. Consequently, a transit agency shall work with local health authorities to determine a practical response.

Responsibility for each task to be performed shall be clearly identified in the plan, and consideration given to the resources required. An example of a table listing possible disinfection responses to different alert phases is shown as Appendix D.

2.4 Sanitary aid to limit spread.

Sanitary aids can assist significantly in limiting the spread of a virus. Additionally, sanitary aids can reassure transit employees and provide them with an added layer of protection in performing their daily functions.

Specific tasks shall be identified to implement the acquisition and distribution of sanitary aids as a function of the various virus-spread sub-phases as determined by the needs of the transit agency.

An example of a table listing sanitary aid responses to different alert phases is shown as Appendix E.

2.5 Vaccine/antiviral medications

Given the spread of a contagious virus, transit agencies shall work with local health authorities to make vaccinations and/or antiviral medications available for essential transit agency employees.

2.6 Service reduction, shutdown, and restoration

Throughout the life cycle of a large-scale viral response, a transit agency may need to reduce service due to employee availability to maintain and operate transit vehicles or to comply with public health department recommendations and directives.

Transit agencies shall identify tasks related to developing service reduction, system shutdown, and system restoration plans. Service reduction planning shall identify indicators that will be monitored regarding ridership and employee availability and include strategies for service reduction.

An example of an outline for service reduction, shutdown and restoration is shown as Appendix H.

2.7 Temperature Screening

As part of this process, and in efforts to keep employees safe LRGVDC – Valley Metro is implementing regular employee temperature checks. While this measure may have seemed unthinkable and fraught with risks, we expect that health screenings, including temperature checks, will become increasingly prevalent in the workplace:

All employees should participate in this initiative, however, if an employee refuses testing, they will be denied entrance into any building and the Supervisor, Director, and HR Managers will be notified.

Any other visitor, vendor who refuses testing, will not be allowed into the office. This matter is very important to ensure our employees good health.

Guidelines:

LRGVDC – Valley Metro employees will check their temperatures on arrival to their work site at a centrally located thermometer stand. If your temperature is above 100.4 please inform your site supervisor. You will return home and await instructions about return to work.

1. Prior to beginning the self-screening process, please ensure you are wearing your mask and gloves while handling the thermometer.
2. Adhere to social distancing and proceed to the temperature station.
3. Read card and point 'yes' or 'no' Select your file and answer the following question as you come in to work. If you answer 'yes' to any of the questions, please follow the instructions on the 'notes' selection.
4. Once you are done, practice the proper hygiene and wipe down all the equipment and area you were in.

An example of the card is shown as Appendix G.

Table A: Example of phases and sub – phases table

Note: The relevance of the table contents may vary from agency to agency and may change over time as knowledge progresses and information expands.

Table 1
Avian Influenza Pandemic Alert Phases

World Health Organization Phases		Sub -Phases	
1	Virus may be presented in animals, but the risk of human infection or diseases is considered low.	1.A	No human nor animal cases within the U.S.
		1.B	No human cases, but evidence of animal cases in some areas of the U.S.
		1.C	Rare animal – close – contact human transmission in the U.S., but outside of state.
		1.D	Rare animals – close – contact human transmission within the state, but outside of the local area.
		1.E	Rare animal – close – contact human transmission in the local area.
2	No new influenza virus subtypes have been detected in humans. Animal virus subtype poses a substantial risk to humans.	2.A	Reports of increased animal – human transmission outside the U.S.
		2.B	Reports of increased animal – to human transmission within the U. S.
3	Human infection(s) with a new subtyped, but no human- to – human spread, except for rare close – contact instances.	3.A	Reports of human infection with a new virus subtype, but no human – to – human spread, except for rare animal close – contact instances outside the U.S.
		3.B	Report of human infection with a new virus subtype, but no human-to-human spread, except for rare animal – close – contact instance within the U.S.
4	Small cluster (s) of human – to human transmission.	4.A	Report of small clusters of highly localized human to human transmission outside the U.S.
		4.B	Report of small cluster of highly localized human to human transmission within the U.S.
5	Larger cluster(s) of human – to human spread, but still localized.	5.A	Larger cluster(s) of humans to human spread, but still localized, outside the U.S.
		5.B	Larger clusters(s) of human-to-human spread, but still localized, within the U.S.
6	Increased and sustained transmission in general population.	6.A	Increased and sustained transmission in general population outside the U.S.
		6.B	

			Increased and sustain transmission in general population within the U.S.
7			Post pandemic phase.

Table B: Example of an internal information and education table

Note: The relevance of the table contents may vary from agency to agency and may change over the time as knowledge progresses and information expands

Table 2

Internal Communications

Alert Phase	Actions	Responsibility
1.A	<ul style="list-style-type: none"> Update the district's Injury and Illness Program Plan (IIPP) with a section on precautions against Contagions Viruses. Distribute personal hygiene information through the Safety reminders Program. 	Safety Division
1.B	<ul style="list-style-type: none"> Develop articles on employee personal hygiene and precautions against contagious viruses. Publish articles in various publications. 	Media and Public affairs and Marketing Division
1.C	<ul style="list-style-type: none"> Disseminate articles developed in 1.B through Lotus Notes, emails, the district website and other forms of outreach. Partner with public health department, especially their Risk Communication Message and Education section, to acquire timely information, and coordinate appropriate new releases to employees and riding public. 	Media and Public affairs and Marketing Division
1.D	<ul style="list-style-type: none"> Develop training video and poster(s) on hygiene and precautionary measures against viruses both at work and in the home. Commence disseminating the video and poster(s) to district departments. Place pertinent information on the district website. 	CDC, with support from Safety Division as needed
1.E,2.B, 3.A and beyond	<ul style="list-style-type: none"> Develop and deliver a more formal awareness program that includes personal visits to employee work location to disseminate facts and to address concerns. This will commence with briefings to managers and unions to solicit their support. 	Safety Division, Media and Public Affairs, select executive and department managers.

	<ul style="list-style-type: none"> Continue to update employees with status reports of the virus conditions, using all appropriate means to distribution. 	
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Table C: Example of an external information and education table

Note: The relevance of the table contents may vary from agency to agency and may change over the time as knowledge progresses and information expands

Table 3

External Communication

Alert Phase	Actions	Responsibility
1.B	<ul style="list-style-type: none"> In accordance with information provided by Health Services “Risk Communication Message and Education Group”, put out passenger’s bulletins in the form of a fact sheet on the risks involved. 	Operations and Safety Division
1.C	<ul style="list-style-type: none"> Prepare outreach/education material in the form of news releases, passengers bulletins and website articles that provide guidance on personal hygiene, and keep patrons informed on the risks involved. Commence disseminating information prepared. 	Planning, Operations and Safety Division
1.D	<ul style="list-style-type: none"> Develop a video and poster(s) on personal hygiene and precautionary measures to take while riding on the system. Disseminate the video (including placing it on the website) and poster(s) and continue to disseminate information prepared in 1.b. Partner with public health departments, especially the Health Department’s “Risk Communication Message and Education Group,” to acquire timely information, and to coordinate appropriate news releases to employees and riding public. Prepare letters to public officials regarding what the TA is doing. Develop partnerships with private corporations to promote cleaner trains/buses/stations (trade advertising for services). 	Planning, Operations and Safety Division

1.E,2.B, 3.A and beyond	<ul style="list-style-type: none"> Continue to disseminate timely information to patrons. Start utilizing station signage and on-vehicle posters to further the promotion of information. Issue letters to public officials. 	Operations
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Table D: Example of a disinfection program

Note: The relevance of the table contents may vary from agency to agency and may change over the time as knowledge progresses and information expands

Table 4

Disinfection Program

Alert Phase	Action	Responsibility
1.B	Commence planning for enhanced cleanliness of the system's buses, trains and stations, particularly hand-contact surfaces. The plan should assess in-house resources and explore contract services that are geared to the different alert phases. An estimate of the costs involved should be part of the planning process	Maintenance, Operations and Safety Division
1.C	Commence the initiative to provide cleaner buses, trains and stations so that patrons perceive the TA to be a safe environment	Maintenance, Operations and Safety Division
1.E, 2.B, 3.A and beyond	Commence program of disinfecting hand-contact surfaces in stations and on trains and buses several times throughout each day.	Maintenance, Operations and Safety Division

Table E: Example of a sanitary aids table

Note: The relevance of the table contents may vary from agency to agency and may change over the time as knowledge progresses and information expands

Table 5
Sanitary Aids

Alert Phase	Action	Responsibility
1.B	<ul style="list-style-type: none">• Establish funding authorization for pending sanitary aid expenses related to the pandemic.• Procure a supply of face masks and disinfectant gel in district stores in reserve for use by district employees.• Work with suppliers to ensure a steady flow of these aids for employees, given a progression of the virus to higher alert levels. Estimate supplies needed for each alert phase.• With reference to alert phase 4.b (below) estimate disinfectant gel needed for patrons, and work with suppliers to ensure a steady flow of this item when the time arrives.	Grant Coordinator, Administrative Assistant III, Operations, and Safety Division
1.E, 2. B. 3A, and beyond	<ul style="list-style-type: none">• Disseminate disinfectant gels throughout the district for employee use, including transportation reporting locations, stations, shops and office building.	Operations
4.B	<ul style="list-style-type: none">• Require employees who work in patron high-density environments (including train and bus operators and station agents) to wear protective masks.• Provide disinfectant gels for use by patrons at each station.	Operations, and Safety Division
5.B	<ul style="list-style-type: none">• Provide protective masks to office employees for use within office environments.• Promote social distancing (avoid face contact meetings, explore telecommuting).	Operations and Safety Division

Table F: Example of vaccine/antiviral medication table

Note: The relevance of the table contents may vary from agency to agency and may change over the time as knowledge progresses and information expands

Table 6

Vaccine and Antiviral Medication

Alert Phase	Action	Responsibility
1.C	<ul style="list-style-type: none">• Work with state and local health departments to track the U.S. government development of guidelines for the allocation of Contagious Virus vaccine and antiviral medications.• Partner with agencies such as APTA and the California Transit Association to lobby for prioritizing transit employees to receive vaccines and antiviral medications.	Safety Division
1.E, 3. B	<ul style="list-style-type: none">• Determine the availability and costs of purchasing vaccines and antiviral medications on the open market.• Commence contracting process to engage appropriate medical assistance for administering these precautionary treatments to employees.	Procurement Department, Human Resource, and Safety Division
4.B	<ul style="list-style-type: none">• Assuming vaccines and/or antiviral medications were acquired either through state/local health departments or purchased on the open market, commence administering these precautionary treatments to employees. Priority should be given to those employees with the greatest exposure to high-density patron environments.	HR to oversee process, affected department to assist

Table G: Card

<p>Are you experiencing any of these symptoms?</p> <ul style="list-style-type: none">- Loss of taste or smell- Headache- Cough and or sore throat- Shortness of breath- Chills- Muscle pain- Diarrhea	<p>Have you been in close contact with a person who is lab confirmed to COVID -19?</p>
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Advise with a Yes or NO to the questionnaire.
(point with your hand)

NO

YES

Table H: Service reduction, shutdown and restoration outline

NOTE: The relevance of the outline may vary from agency to agency and may change over time as knowledge progresses and information expands.

Service reduction

The following indicators will be monitored by Operations as potential service reduction triggers:

- Ridership
- Employee attendance
- Asset availability

Service levels will be adjusted as necessary, with the following anticipated progression:

- Shorten vehicles
- Drop certain train/bus runs from the schedule
- Revise Saturday service schedule
- Shut down the system

Service reduction issues are anticipated to include the following:

- Labor contract language
- Employee welfare
- Development of work rules/guidelines regarding hygiene practices in the work environment

Service shutdown

Given the need to shut down service, the primary objective will be to execute an orderly, safe conclusion of service, which preserves district assets in a condition that will facilitate later service restoration.

Major tasks involved in the shutdown of the system consist of the following:

- Complete operations (complete final service runs and store all vehicles)
- Close stations/bus terminals
- Secure shop/yard buildings
- Recover all types of maintenance equipment
- Complete revenue pickup and processing
- Deploy property protection
- Establish communications and logistics plan for administrative work (possible coordination from home, individual office or other location as needed)

Initial shutdown of bus operations

- Transportation will arrange for qualified personnel to complete service, including staffing of the Control Center.
- All revenue vehicles will be appropriately positioned in the yards at close of operations for the night.
- Notifications will be provided to the dispatch centers of other transit providers in the area.

Initial shutdown of bus maintenance

- Bus operations will secure buses in yards.
- Bus maintenance will inspect and key-off fleet
- Property protection will be provided by Operations Supervisors II, supported by other TA departments as necessary.

Initial shutdown of stations and shops

- Transportation will post personnel at stations/bus terminals and yard towers.
- Maintenance and Engineering will post personnel at maintenance shops and provide personnel for train control, power and mechanical, and computer support.
- Bus maintenance will post personnel at each of the bus yards.
- Revenue collections will commence after station closing.
- Ongoing property protection will be provided by transit police.

Initial shutdown of TA training center and district offices

- The training center will be closed and secured upon receipt of a shutdown order.
- Managers of other district offices will evaluate their essential functions and either suspend work or develop contingency work plans as needed.
- Ongoing security will be provided by transit police.
- Special security provisions will be implemented at the TA main offices.

Property/assets protection

After the shutdown phase, Operations staff will be assigned as follows:

- personnel for Control Center
- personnel for yard towers
- personnel for end-of-line storage locations
- personnel for shared stations (i.e., with other transit agencies that are still operating)
- personnel for non-shared stations
- personnel for Maintenance and Engineering support of train control, power and mechanical, revenue collection and computer systems

- personnel for the Logistics Center

Property protection will be provided by the transit police department with the following support:

- Roving patrols by TA personnel to augment station/yard/shop checks
- Transportation to supply yard fire watch
- Bus maintenance to supply shop fire watch

Restoration of service

In anticipation of service restoration, the following actions will be performed:

- Conduct complete system inspection before start-up.
- Inspect stations/bus terminals, including power and operational checks of all equipment and supplies (cash, tickets, schedules and brochures).
- Complete any repairs or maintenance identified during the start-up inspections.
- Inspect revenue vehicle fleet.

Service will commence after the actions have been accomplished, and contingent upon approvals by the Operation Supervisors II, Director and Executive Director

8. APPENDIX D

9. Safety Risk Assessment (49 CFR § 673.25(c))

The **Safety Risk Assessment** process, as required by 49 CFR § 673.25(c), includes identifying safety hazards, assessing risks, and determining appropriate mitigations. Below is a structured template to guide transit agencies through this process:

1. General Information

- **Agency Name:** LRGVDC – Valley Metro
- **Assessment Title:** e.g., Safety Risk Assessment for Transit Worker Assaults
- **Assessment Date:** Insert Date
- **Prepared By:** Name/Title of Person or Team Conducting the Assessment

2. Objective

- Clearly state the purpose of the assessment.
Example: *"To evaluate the safety risks associated with transit worker assaults and develop mitigation strategies to reduce the likelihood and severity of such incidents."*

3. Scope

- Define the areas covered by the assessment (e.g., specific routes, facilities, vehicle types, geographic regions).
- Specify the population impact (e.g., drivers, customer service representatives, maintenance staff).

4. Safety Hazard Identification

- **Data Collection Methods:**
 - Review incident reports and historical data.
 - Conduct employee and passenger surveys.
 - Analyze security footage, complaint logs, and feedback.
- **Identified Hazards:**
Example:

Hazard ID	Description	Location	Date Identified
H-001	Verbal altercations escalating to assault	Route 5, Station A	
H-002	Insufficient lighting at bus stops	Downtown Transfer Center	

5. Risk Assessment

- **Risk Evaluation Matrix:** Assess each hazard based on likelihood and severity.

Hazard ID	Likelihood (Low/Med/High)	Severity (Low/Med/High)	Overall Risk Level (Low/Med/High)
H-001	High	Medium	High
H-002	Medium	High	High

- Include a brief explanation of how the risks were evaluated.

6. Safety Risk Mitigations

For each identified risk, document mitigation strategies:

Hazard ID	Mitigation Strategy	Responsible Party	Implementation Deadline
H-001	Increase security presence on Route 5	Safety Officer	
H-002	Install additional lighting at bus stops	Maintenance Department	

7. Action Plan

- **Implementation Steps:** Outline the steps to implement each mitigation strategy.
- **Monitoring Plan:** Describe how each mitigation will be monitored for effectiveness (e.g., incident tracking, employee feedback).

8. Documentation and Record-Keeping

- Maintain records of the assessment, including hazard identification, risk evaluations, and implemented mitigations.
- Document how results were communicated to relevant staff and committees.

9. Safety Committee Involvement (if applicable)

- **Committee Role:** Document the involvement of the joint labor-management Safety Committee in identifying and recommending mitigations.
- **Recommendations:** Include specific recommendations provided by the committee.

10. Conclusion and Next Steps

- Summarize the findings and planned actions.
- State the timeline for the next risk assessment or review.