


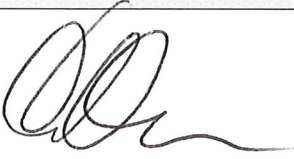
2022 Lawrence Transit Agency Safety Plan



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Plan Development, Approval, and Updates

This plan was drafted by Lawrence Transit in accordance with the Code of Federal Regulations, [Part 673](#).

Signature by the Accountable Executive	Signature by the Accountable Executive		Date of Signature
			12/13/2022
Approval by the Board of Directors or an Equivalent Authority	Signature by Oversight Authority		Date of Approval
			12/29/22
		Relevant Documentation (title and location)	
		Approved by the Lawrence City Commission on 12/13/2022. Agenda Item	

Version Number and Updates			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	-	-	8/31/2020
2		Revision with new federal guidelines	12/13/2022
Annual Review and Update of the Public Transportation Agency Safety Plan			

Transit Agency Information:

Lawrence Transit

933 New Hampshire St.

Lawrence, KS 66044

Accountability Executive: Adam Weigel

Chief Safety Officer: Ginger Doll

Modes of service covered by this plan: Fixed Route, Paratransit, General Public Demand Response

Modes provided by transit agency: Fixed Route, Paratransit, General Public Demand Response

FTA funding types: 5307

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Frontline Employee Engagement

To align with [new federal guidance](#) on public transit agency safety plans, Lawrence Transit engaged frontline employees directly in the 2022 update to the Lawrence Transit Agency Safety Plan. Drivers, maintenance, and dispatchers reviewed the 2020 Lawrence Transit Agency Safety Plan and provided feedback on the following four questions:

- Do you have any recommendations for improving how employees make safety reports?
- Is there anything we could be doing better to identify and prevent safety risks?
- Is there anything we could be doing better to inspect and monitor the safety of operations?
- Do you have any recommendations to improve the promotion/culture of safety among staff?

Written responses and notes from discussion of these questions resulted in revisions to several sections of this document, and a couple themes emerged:

- There should be **multiple methods** by which employees can make safety concern reports, and all employees should receive **refresher training** on those methods. Methods should include an **electronic reporting option** and the **option for anonymity**.
- The Safety Committee should take a more active role in building a **culture of safety**, with strong support from management. Veteran drivers have deep knowledge of **unique safety issues** on route that is helpful for all drivers to know.

Safety Performance

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

Safety Performance Targets

Mode of Transit Service	Fatalities (total)	Fatalities (per 100 thousand VRM)	Injuries (total)	Injuries (per 100 thousand VRM)	Safety Events (total)	Safety Events (per 100 thousand VRM)	System Reliability (VRM/failures)
Fixed Route Bus Service	0	0	2	0.2	2	0.2	40,000
Demand Response Bus Service	0	0	2	0.2	2	0.2	40,000

Safety Performance Target Coordination

The **Lawrence Transit** Accountable Executive shares our Safety Plan, including safety performance targets, with the **Lawrence-Douglas County Metropolitan Planning Organization** (MPO) in our service area each year after its formal adoption. The Agency's Accountable Executive also provides a copy of our formally adopted plan to the Kansas Department of Transportation (KDOT). Agency personnel are available to coordinate with KDOT and the MPO in the selection area of KDOT and MPO safety performance targets upon request.

Safety Management Policy

The Safety Management Policy is a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regards to safety.

Safety Management Policy Statement

Safety is one of the primary components of **Lawrence Transit's** mission as a transit provider. It is our responsibility as an organization to serve the public in a safe manner and to ensure that passengers and operators are at minimal risk to injury. **Lawrence Transit** is committed to the following:

- Communicating safety risks and mitigations to all members of the agency,
- Allowing employees to report safety hazards with and/or without revealing their identity,
- Appropriately acting on employee reports in order to mitigate identified safety hazards, and
- Establishing realistic safety performance targets.

Safety Management Policy Communication

The Safety Management Policy Statement was introduced to staff after the plan was approved. The Chief Safety Officer is responsible for posting and informing staff of the Safety Management Policy Statement. It is also a part of new-hire training and annual refresher training.

Authorities, Accountabilities, and Responsibilities

Accountable Executive

- Appoints a Chief Safety Officer who is a direct report.
- Ensures the implementation of any and all safety risk mitigations.
- Ensures action is taken to address substandard safety performance.
- Assumes ultimate responsibility for carrying out this plan.

Chief Safety Officer

- Ensures and oversees day-to-day implementation and operation of **Lawrence Transit's** safety plan and safety risk mitigations.
- Manages the employee reporting system and reviews all employee reports daily.
- Chairperson of the Safety Committee, which involves:
 - Appointing members,
 - Scheduling bimonthly meetings,
 - Creating meeting agendas and sign-in sheets,
 - Leading meetings, and
 - Recording meeting minutes.
- Identifies substandard performance in the **Lawrence Transit** safety plan and develops action plans for approval by the Accountable Executive.
- Provides safety risk management expertise and support for other **Lawrence Transit** personnel who conduct and oversee safety assurance activities.

Safety Committee: Any safety hazards reported will be jointly evaluated by the Safety Committee and the Chief Safety Officer during meetings. The annual frequency of meetings is at the discretion of the Chief Safety Officer but will meet no fewer than 4 times annually.

Members of the Safety Committee are chosen by the Chief Safety Officer. The committee should consist of no fewer than 4 members, including members from all departments (executive, dispatch, operations, and maintenance), as well as an interested transit user.

Drivers' Meetings: A permanent agenda item in all Drivers' Meetings is dedicated to safety. Known safety issues, risks, and new mitigations will be discussed. The annual frequency of meetings is at the discretion of the Chief Safety Officer, and it is recommended that meetings be held monthly.

All-Staff Meetings: Hazard reports and mitigations will be shared, safety topics will be brought up for open discussion, further feedback solicited, and hazard self-reporting further encouraged. Information discussed in these meetings will be documented. All-Staff meetings should not disrupt service and it is not necessary that all drivers attend. However, representation from drivers is required. The annual frequency of meetings is at the discretion of the Chief Safety Officer. It is recommended that these meetings be held monthly, or at a minimum quarterly.

Employee Safety Reporting Program

In order to create a safer work environment, employees are encouraged to report anything that they identify as unsafe during their day-to-day duties. Employees may report unsafe conditions directly to their supervisor or the dispatcher. If employees choose to make reports anonymously, they may put them in the comment box located in the driver area. Employees who report unsafe conditions are free from any retribution as a result.

Typical employee reports contain information such as:

- Concerns related to transit operation (for example, road conditions or weather);
- Safety policies or procedures that are not working as intended;
- Events that senior managers might not otherwise know about (for example, near misses); and
- Information about why a safety event occurred (for example, radio communication challenges).

A sample Employee Reporting form is included in **Appendix 2**.

Employees' safety reports will be reviewed daily by the Chief Safety Officer (CSO). At their discretion, reports will be forwarded to members of the Safety Committee to be addressed at the next Safety Committee meeting.

The CSO will also discuss actions taken as a result of employee reporting during the next All-Staff Meeting.

Safety Risk Management

Safety Risk Management is a process within a Transit Agency's Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risk.

Safety Hazard Identification

Safety Hazards can be identified through:

- Employee Reporting (through pay sheets, anonymous customer form on website, and verbal communication to dispatch)
- Review of vehicle camera footage (where applicable);
- Monthly review of performance data;
- Supervisor observation;
- Customer/passenger comments (a sample customer comment form is included in Appendix 1);
- Safety Committee, Drivers', and All-Staff Meetings;
- Training assessments;
- Inspections of vehicles, facilities, and equipment;
- Investigations of safety events; and
- Federal Transit Administration (FTA) and other oversight authorities.

Any observation of a safety concern will be reported to the CSO. The CSO is responsible for determining whether to:

- Take immediate action;
- Follow up on the report; or
- Take no action.

Actions that the CSO may take to follow up on a safety report may include:

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

After taking action, the CSO will discuss identified hazards and consequences at the next Safety Committee meeting. All actions should be documented and records maintained per the RFP for Public Transportation Services issued July 17th, 2018.

Safety Risk Assessment

If an identified hazard poses an immediate risk to life, property, or the environment, the CSO must immediately bring the hazard to the Accountable Executive for safety risk assessment and mitigation. It is up to the discretion of the CSO to determine if a hazard justifies this intervention.

When an identified hazard is brought to the Safety Committee, it is given a hazard rating that helps to determine what steps need to be taken to mitigate the risk. The methodology used to evaluate risks is shown in **Appendix 3**.

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

Safety Risk Mitigation

The Accountable Executive and CSO review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards based on recommendations from the Safety Committee.

Prioritization of safety risk mitigations is based on the results of safety risk assessments. The CSO tracks and updates safety risk mitigation information in the Safety Risk Register and makes

the Register available to the Safety Committee during bimonthly meetings and to staff upon request.

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

Safety Assurance

Safety Assurance is the process within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Performance Monitoring and Measurement

The agency uses the following measures to ensure that all employees, equipment, vehicles, and facilities are complying with operations and maintenance procedures:

- Safety Audits,
- Informal inspections
- Regular review of onboard camera footage to assess drivers and specific incidents (where applicable),
- Safety surveys,
- Employee reports,
- Investigation of safety occurrences,
- Monitoring and review of daily data,
- Vehicle inspections, and
- Maintenance of employee training records

Information gathered from these sources is compared with recent performance to determine whether actions need to be taken.

Safety Risk Mitigation Monitoring

Once a hazard has been mitigated, the CSO is responsible for monitoring the mitigation to ensure that it is working appropriately. The CSO must establish a method for monitoring mitigations as part of the implementation of safety risk mitigations. The CSO may assign a supervisor or director the responsibility of monitoring the mitigation. The timeframe required for monitoring the mitigation will be determined by the CSO in consultation with the Accountable Executive. Mitigation monitoring records must be maintained for no less than seven (7) years.

The CSO and Safety Committee review the performance of individual safety risk mitigations during the bimonthly Safety Committee meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or

performing as intended. If the mitigation is not implemented or performing as intended, the Safety Committee will propose a course of action to modify the mitigation or take other action to manage the safety risk. The CSO will approve or modify this proposed course of action and oversee its execution.

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

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

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

Investigations of Safety Events

Following a safety event, an investigation is started to determine causal factors and potential solutions. The investigation is led by the CSO and the Accident/Incident Review Board.

Members of this body include the Safety Committee, the agency's board, as well as appropriate outside state and local officials. The Review Board will determine whether:

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

The CSO and Safety Committee are also required to:

- Review safety information and documents;
- Ensure that the concerns are investigated or analyzed;
- Review internal and external reviews, including audits and assessments; and
- Report safety events to the Accountable Executive for oversight and to ensure FTA/NTD is notified within 30 days of qualifying incidents.

Safety Promotion

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

Competencies and Training

All employees are required to complete necessary safety trainings, including:

- Vehicle operators,
- Dispatchers,
- Maintenance technicians,
- Managers and supervisors,
- Agency Leadership and Executive Management,
- The Chief Safety Officer, and
- Accountable Executive.

All employees are required to complete federal mandated safety training. Additional recommended job-specific training is outlined below.

Additional operations safety-related skill training COULD include the following:

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

Additional vehicle maintenance safety-related skill training COULD include the following:

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

The Accountable Executive and Agency Leadership and Executive Management team must complete FTA's SMS Awareness online training and an executive session on safety management within 90 days of first hire and once annually thereafter.

The Kansas Rural Transit Assistance Program offers online training courses for new drivers and refresher courses (found at <https://kutc.ku.edu/rtap>).

Safety and training activities must be documented and retained for no less than seven (7) years.

Safety Communication

The agency's safety policy is communicated in three ways:

1. Communicating safety and safety performance information throughout the agency:

The agency communicates safety information and performance in its quarterly All-Staff Meetings, and Drivers' Meetings. Information communicated during these meetings typically includes safety performance statistics, lessons learned from recent

occurrences, and upcoming events that may impact the agency's service or safety performance. To encourage more veteran driver advice reaching all drivers, unique safety tips from experienced drivers is shared at Drivers' Meetings.

2. **Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency:** As part of new-hire training, the agency distributes safety policies and procedures, included in the Employee Handbook, to all employees. Employees must acknowledge receipt of this training, and documentation must be kept in the employee file.
3. **Informing employees of safety actions taken in response to reports submitted through the ESRP:** The agency provides targeted communications to inform employees of safety actions taken in response to reports submitted through employee reports.

Additional Information

Definitions of Terms

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

Collision (NTD)- A vehicle/vessel accident in which there is an impact of a transit vehicle/vessel with:

- Another transit vehicle
- A non-transit vehicle
- A fixed object
- A person(s) (suicide/attempted suicide included)
- An animal

Hazard- any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities equipment, or infrastructure of a public transportation system; or damage to the environment.

Passenger- 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.

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

Safety Assurance- the process within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Event (NTD)- A collision, , fire, hazardous material spill, act of nature (Act of God), evacuation, or [other safety occurrence not otherwise classified] occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds.

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

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

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

Safety Risk- 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- the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management- a process within a Transit Agency's Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risk.

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

List of Acronyms

Acronym	Word or Phrase
CFR	Code of Federal Regulations
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
NTD	National Transit Database
PART 673	49 CFR Part 673 (Public Transportation Safety Plan)
SMS	Safety Management System
VRM	Vehicle Revenue Miles
LTS	Lawrence Transit System

APPENDICIES

1. Sample Customer Comment Form (Web-based)

Comment

Thank you for taking the time to share your input! We're here to help! Use this form to send complaints or compliments. For immediate assistance, you can also call our customer service hotline at (785) 864-4644.

Contact Information

Name*

First

Last

Email*

Phone

Circumstances

Bus Route

Vehicle Number

Direction of Travel

Address or Intersection

Street Address

Time

 :

Date

Description

2. Sample Employee Reporting Form

INCIDENT REPORT



Location: Lawrence - 55357 Address: 1260 Timberedge Rd, Lawrence, KS 66049

Employee Name: _____ Today's Date: _____

Route Number: _____ Vehicle Number: _____

Customer (Rider) Name: _____

Date of Incident: _____ (When?)

Incident Description:

Where did it happen?

Who was involved?

What happened?

What action taken?

Employee Signature

Print Employee Name

Supervisor Signature

Date Submitted

3. Safety Risk Assessment Methodology

Sample Safety Risk Matrix and Likelihood and Severity Tables

Likelihood of Occurrence of the Consequence		Value
Frequent	Likely to Occur Frequently ($>10^{-3}$)	A
Probable	Likely to Occur Several Times ($<10^{-3}$ but $>10^{-4}$)	B
Occasional	Likely to Occur Sometime ($<10^{-3}$ but $>10^{-5}$)	C
Remote	Very Unlikely to Occur ($<10^{-4}$ but $>10^{-6}$)	D
Improbable	Almost inconceivable that the event will occur ($<10^{-6}$)	E

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

Risk Assessment Matrix				
Likelihood	Severity			
	1 (Catastrophic)	2 (Critical)	3 (Marginal)	4 (Negligible)
A (Frequent)	1A	2A	3A	4A
B (Probable)	1B	2B	3B	4B
C (Occasional)	1C	2C	3C	4C
D (Remote)	1D	2D	3D	4D
E (Improbable)	1E	2E	3E	4E

Risk Assessment Matrix Color Code	
"Tolerability" based on identified severity and likelihood.	
Unacceptable under the existing circumstances.	
Acceptable based upon mitigations.	
Acceptable with senior management approval.	

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