

Mountain Line Public Transportation Agency Safety Plan



Samuel Short
November 18, 2020

1. Transit Agency Information

Transit Agency Name	Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA), Mountain Line		
Transit Agency Address	3773 N. Kaspar Dr. Flagstaff AZ. 86004		
Name and Title of Accountable Executive	CEO/GM Heather Dalmolin		
Name of Chief Safety Officer or SMS Executive	Workforce Director Samuel Short		
Mode(s) of Service Covered by This Plan	Bus, Paratransit	List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5310, 5311, 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route Bus;Paratransit, Bus and Bus Facilities – all directly operated.		
Does the agency provide transit services on behalf of another transit agency or entity?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Description of Arrangement(s)
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided			

2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Northern Arizona Intergovernmental Public Transportation Authority	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	NAIPTA Board of Directors	March 27 th , 2024
	Relevant Documentation (title and location)	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification
	CEO/General Manager Heather Dalmolin	February 28 th , 2024
	Relevant Documentation (title and location)	

Version Number and Updates			
<i>Record the complete history of successive versions of this plan.</i>			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
01	None	New Document	11/18/20
02	Pages 8, 14, 18	Battery Electric Bus	03/28/24

Annual Review and Update of the Public Transportation Agency Safety Plan
<i>Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.</i>

The Mountain Line Safety Plan is a “living document” and must address issues associated with the system safety on a timely and proactive basis. The Safety Plan will be updated at any point when Mountain Line determines that it’s Safety Management System approach to safety has identified a need for change. The Board allows the CEO/General Manager to make these changes. In addition, an annual review of the Safety Plan will be conducted by the CEO/General Manager, Safety Manager, Leadership and the Safety Committee at the end of each fiscal year. The annual review will be completed annually by July 31st. During the review, if changes are needed, Mountain Line will revise the Safety Plan and training to reflect the changes. Mountain Line’s CEO/General Manager will certify the Safety Plan in compliance with C.F.R. Part 673

3. Safety Performance Targets

Safety Performance Targets							
<i>Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.</i>							
Mode of Transit Service	Fatalities	Injuries	Injuries Revenue Service	Fatalities (per 100 thousand VRM)	Injuries (per 100 thousand VRM)	Preventable accident per 35,000 VRM	Vehicle Accidents per 25,000 VRM
Fixed Route Bus	0	4	2	0	.25	.75	.50
Paratransit / ADA	0	1	2	0	.25	.25	.05

Safety Performance Target Coordination		
<i>Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.</i>		
Mountain Lines CEO/GM will share the Agency Safety Plan, including performance targets, with the Flagstaff Metropolitan Planning Organization each year after its formal adoption by the Mountain Line Board of Directors. Mountain Lines CEO/GM also provides a copy of our formally adopted plan to the Arizona Department of Transportation.		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Arizona Department of Transportation	TBD
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Flagstaff Metropolitan Planning Organization	TBD

4. Safety Management Policy

Safety Management Policy Statement

Include the written statement of safety management policy, incorporating safety objectives.

Safety Management Policy

The Safety Management Policy is one of the four principles or pillars of Safety Management System. The management of safety is a top priority and core value of Mountain Line. This Plan has been developed as a means of integrating safety into all Mountain Line departments. We are committed to implementing, maintaining and constantly improving processes to ensure that all our operational and maintenance activities are supported by an appropriate allocation of organizational resources and aimed at achieving the highest level of transit safety performance. All levels of management and all front-line employees are accountable for the delivery of this highest level of safety performance, starting with the Mountain Line Board of Directors, Chief Executive Officer/General Manager, Directors, and Managers.

Mountain Line is committed to:

- **Support** the management of safety by providing appropriate resources to support an organizational culture that fosters safe operational practices, encourages effective safety reporting and communication, and actively manages safety with the same attention to results as that given to the other management systems of the agency.
- **Integrate** the management of safety as an explicit responsibility of all managers, supervisors, and employees.
- **Clearly** define for all managers and employees their accountabilities and responsibilities for the delivery of safe transit services and the performance of this Plan.
- **Establish and Operate** a safety reporting program/process as a fundamental tool in support of agency's hazard identification and safety risk evaluation activities to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities to a point that is as low as reasonably practicable.
- **Ensure** (1) that no action will be taken against any employee who discloses a safety concern through the safety reporting program/procedure, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures; (2) that sufficiently trained and skilled personnel are available & assigned to implement this Plan its processes & activities; (3) that all agency's staff are formally provided with adequate and appropriate safety management information, are competent in Plan's activities, and are assigned only safety related tasks commensurate with their skills; and (4) that contracted services that support our agency's mission are meeting our safety performance standards.
- **Comply** with and, wherever possible, exceed any applicable legislative and regulatory requirements and standards.

- **Establish and Measure** our agency's safety performance against realistic safety performance indicators and safety performance targets.
- **Continually Improve** our agency's safety performance through management processes that ensure relevant safety action is taken in a timely fashion and is effective when carried out.

The Plan has been approved by the CEO/General Manager and the Board of Directors. The CEO/General Manager has delegated authority to the Safety Manager for the implementation of this Plan.

This safety policy supports Mountain Line's mission, vision and values of safety within the organization. By following the processes described in this Plan, Mountain Line will have continuing opportunities to improve overall safety performance of this agency.

Safety Management Policy Communication

Describe how the safety management policy is communicated throughout the agency's organization. Include dates where applicable.

Safety Management Policy Communication

The Mountain Line Safety Plan will be communicated throughout the agency through various processes such as:

- Workshops/training sessions - These will be conducted for Senior Management, Directors, Managers, and Supervisors. Once this plan has been signed by the CEO/General Manager and approved by the Board of Directors, the plan will be implemented at each respective department and will continue until every employee in the organization becomes familiar with their specific roles and responsibilities pertaining to The Mountain Line Safety Plan/SMS.
- New Hire Safety Orientation – Through this program all new employees, regardless of their classifications will be trained about their roles and responsibilities pertaining to the Mountain Line Safety Plan and the principles of SMS.
- The safety communication will continue using safety trainings, bulletins, safety minutes, and safety committee meetings, etc.
- In addition, annual safety audits/reviews of the Mountain Line Safety Plan, will be conducted to bring focus on the safety management communication aspect and the implementation status of the Mountain Line Safety Plan and SMS principles.

Authorities, Accountabilities, and Responsibilities

This Plan has assigned specific authorities, accountabilities, and responsibilities to the designated Accountable Executive; Chief Safety Officer; Chief Operations Director and Agency's Leadership/Executive Management; and Key Staff/Employees. Some of these assigned tasks pertaining to the Mountain Line Safety Plan are described below:

Authorities, Accountabilities, and Responsibilities

Describe the authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency's Safety Management System (SMS).

<p>Accountable Executive</p>	<p>The CEO/General Manager is assigned as the Accountable Executive and some of the responsibilities include:</p> <ul style="list-style-type: none">• Establishing and maintaining the Mountain Line Safety Plan based on SMS principles.• Ensuring safety concerns are considered and addressed in the agency's ongoing budget planning process.• Ensuring transparency in safety priorities: for the Board of Directors and for the employees.• Establishing guidance on the level of safety risk acceptable to the agency.• Assuring safety policy is appropriately communicated throughout the agency.• Decision making about resources (people & funds) to support the Transit Asset Management Plan, Mountain Line Safety Plan, and capital investments.
<p>Chief Safety Officer or SMS Executive</p>	<p>The Safety Manager is assigned as the Chief Safety Officer or SMS Executive and some of the responsibilities include:</p> <ul style="list-style-type: none">• Developing, updating and maintaining the Mountain Line Safety Plan/SMS• Developing and organizing annual audits of Mountain Line Safety Plan & SMS principles to ensure compliance with 49 CFR Part 673 requirements.• Overseeing the hazard management program and facilitating hazard identification, safety risk analysis and assessment, and the development and completion of safety risk controls and corrective actions.• Maintaining safety documentation.• Planning and organizing safety training.• Providing regular reports on safety performance• Briefing the Accountable Executive and Board of Directors on the Mountain Line Safety Plan/SMS implementation activities.

<p>Agency Leadership and Executive Management</p>	<p>The Agency Leadership/Executive Management is comprised of the Deputy General Manager and the department directors of each department as shown in Mountain Line’s Organization Chart Appendix – A; which includes: Operations Director; Marketing and Communications Manager; Management Services Director; Facilities Manager; Operations Manager; Safety Manager; Human Resources Manager; and IT Manager. Some of the responsibilities include:</p> <ul style="list-style-type: none"> • Day-to-day implementation of the Mountain Line Safety Plan throughout their department/organization. • Communicating safety accountability and responsibility from the front-line employees, to the top of their organization. • Ensuring employees are following their working rules and procedures and following safety rules & regulations in performing their jobs. Also, they are following their specific roles & responsibilities in the implementation of the Mountain Line Safety Plan. • Ensuring that employees complying with the safety reporting program and are reporting unsafe conditions and hazards to their department management and those unsafe conditions and hazards are corrected in a timely manner. • Ensuring that resources are sufficient to carry out employee training/certification and re-training as required by their job classifications.
<p>Key Staff</p>	<p>The agency key staff/employees may include managers, supervisors, specialists, analysts, database administrator, and other key employees who are performing highly technical work and overseeing employees performing critical tasks and providing support in the implementation of Mountain Line Safety Plan in various departments throughout the agency. The key staff/employees’ responsibilities include:</p> <ul style="list-style-type: none"> • Ensuring that employees are complying with the safety reporting program. • Ensuring supervisors are conducting their safety briefings and allowing for safety issues to be discussed during each regularly scheduled meeting. • Promoting safety in employee’s respective area of responsibilities – That means: zero accidents; absence of any safety concerns; perfect employee performance; and compliance with agency rules & procedures and regulatory requirements. • Ensuring safety of passengers, employees, and the public. • Responding to customer complaints and expectations for frequency, reliability, and convenience of service. • Replacing and maintaining aging facilities, equipment, and infrastructure.

- Meeting increasing demands for fixed route, commuter service and paratransit service.
- Develop and maintain database software programs to gather pertinent data elements to develop Key Performance Indicators (KPI) reports and conduct useful statistical analyses to identify trends and system performance targets.
- Establishing clear lines of safety communication and holding accountability for safety performance.

Employee Safety Reporting Program

Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded from protection).

Mountain Lines Employee Safety Reporting Program encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith, without fear of retribution. There are many ways an employee can report safety conditions:

- Report conditions directly to the dispatcher or Operations Supervisor, who will report them to their direct manager.
- Report conditions anonymously via locked Safety and Security Report Forms box in the Downtown Connection Center Break Room, vestibule in front of dispatch, or near the south door in Shop 0.
- Report unsafe conditions to: safetyandtraining@mountainline.az.gov
- Report conditions directly to any Operations Supervisor, manager, or director.
- Report conditions using the See Say Now Mobile App [See Say Now \(Mountain Line\) app](#), Text-a-Tip number 928-220-3590, or Web App go.elerts.com/mountainline
- Report conditions directly to the Safety Manager at: Office (928) 679-8931, Cell (928) 607-4287

Examples of information typically reported include:

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

On a daily basis, the Safety Manager will review the dispatch daily Operations Log, check the Safety and Security Report Forms boxes and the dedicated email address, and documents identified safety conditions in the Safety Risk Register. Mountain Line Safety Manager, supported by the Safety Committee, as necessary, will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and resolved through Mountain

Lines Safety Risk Management process and that reported deficiencies and non-compliance with rules or procedures are managed through Mountain Lines Safety assurance Process.

Mountain Line Safety Manager will discuss actions taken to address reported safety conditions during monthly staff meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the Safety Manager or designee will follow up directly with the employee when Mountain Line determines whether or not to take action and after any mitigations are implemented. If the employee reporting the issue is not known, the report and report disposition will be placed on Mountain Lines monthly Transit Voice.

Mountain Line encourages participation in the Employee Safety Reporting Program by protecting employees that report safety conditions in good faith (see Mountain Line Personnel Policy Manual 5.4 Open Door/Informal and Formal Problem Resolution). However, Mountain Line may take disciplinary action if the report involves any of the following:

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

5. Safety Risk Management

Safety Risk Management Process

Describe the Safety Risk Management process, including:

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards.*
- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards.*
- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment.*

Safety Risk Management Process

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

Mountain Lines Safety Manager leads the Safety Risk Management process, working with the Safety Committee to identify hazards and consequences, assess safety risk of potential consequences, and mitigate safety risk. The results of Mountain Lines Safety Risk Management process are documented in our Safety Risk Register and referenced materials.

Mountain Lines Safety Risk Management process applies to all elements of our system, including our operations, facilities and maintenance, vehicles, personnel recruitment, training and supervision.

In carrying out the Safety Risk Management process, Mountain Line uses the following terms:

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

Safety Hazard Identification

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

- Employee Safety Reporting Program;
- Review of vehicle, building, and body worn camera footage.
- Review of monthly performance data and safety performance targets;
- Observations from Operations Supervisors;
- Maintenance reports;
- Comments from customers, passengers, and third parties, including Mountain Lines transit insurance pool and vendors;
- Safety Committee, Operator', and all staff meetings;
- Results or audits and inspections of vehicles and facilities;
- Results of training assessments;
- Investigations into safety events, incidents, and occurrences; and
- Federal Transit Administration and other oversight authorities

When a safety concern is observed by Mountain Line management or supervisory personnel, whatever the source, it is reported to the Safety Manager. Procedures for reporting safety hazards to the Safety Manager are reviewed during all staff meetings and in the Safety Committee. The Safety Manager also receives employee reports received from the Employee Safety Reporting Program, customer comments relating to safety, and the dispatch daily Operations Log. The Safety Manager will review these sources for hazards and documents them in the Mountain Line Safety Risk Register.

The Safety Manager will also enter the hazards into the Safety Risk Register based on their review of Mountain Line operations and maintenance, the results of audits and observations, and information received from the Federal Transit Administration, other oversight authorities, and the National Transportation Safety Board.

The Safety Manager may also conduct further analysis of hazards and consequences entered into the Safety Risk Register to collect information and identify additional consequences, and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, the Safety Manager may:

- Contact 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

Mountain Lines Safety Manager will then prepare an agenda to discuss identified hazards and consequences with the Safety Committee during monthly meetings. This agenda may include additional background on the hazards and consequences, such as the results of trend analysis, vehicle camera footage, vendor documentation, reports and observations, or information supplied by the Federal Transit Administration or other oversight authorities.

Any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately be brought to the attention of the General Manager/CEO of Mountain Line and addressed through the safety risk management process (with or without the full Safety Committee) for safety risk assessment and mitigation. This means that the Safety Manager believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of the Environmental Protection Agency or any state environmental protection standards. Otherwise, the Safety Committee will prioritize hazards for further safety risk management activity.

Safety Risk Assessment

Mountain Line assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations and prioritizing hazards based on safety risk.

The Safety Manager and the Safety Committee assess prioritized hazards using Mountain Lines Safety Risk Matrix (Appendix B). This matrix expresses assessed risk as a combination of one severity category and one likelihood level, also referred to as a hazard rating. For example, a risk may be assessed as "1A" or the combination of a Catastrophic (1) severity category and a Frequent (A) probability level.

This matrix also categorizes combined risk into levels, High, Medium, or Low, based on the likelihood of the occurrence and severity of the outcome. For purposes of accepting risk:

- "High" hazard ratings will be considered unacceptable and require immediate action from Mountain Line to mitigate the safety risk,
- "Medium" hazard ratings will be considered undesirable and require Mountain Lines Safety Committee to make a decision regarding their acceptability, and
- "Low" hazard ratings may be accepted by the Safety Manager without additional review.

Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk.

The Safety Manager 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 Safety Manager will review the hazards and its consequences. The Safety Risk Assessment Package, regarding the severity and likelihood of the hazard will also be reviewed. The Safety Manager may request support from the members of the Safety Committee in obtaining additional information to support the safety risk assessment.

Once sufficient information has been obtained, the Safety Manager will facilitate completion of the relevant sections of the Safety Risk Register, using the Mountain Line Safety Risk Assessment Matrix, with the Safety Committee. The Safety Manager will document the Safety Committee's safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Safety Risk Register. The Safety Manager will maintain on file, Safety Committee agendas, Safety Risk Assessment Packages, additional information

collection, and completed Safety Risk Register sections for a period of three years from the date of generation.

Safety Risk Mitigation

Mountain Lines CEO/General Manager and the Safety Manager will 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.

Mountain Line can reduce safety risk by reducing the likelihood and/or the severity of potential consequences of hazards.

Prioritization of safety risk mitigations is based on the results of safety risk assessments.

Mountain Lines Safety Manager will track and update safety risk mitigation information in the Safety Risk Register and will make the register available to the Safety Committee during their monthly meetings. The register will also be available to Mountain Line staff upon request.

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

6. Safety Assurance

Through our Safety Assurance process, Mountain Line will:

- Evaluate our compliance with operations and maintenance procedures to determine whether our existing rules and procedures are sufficient to control our safety risk:
- Assess the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended;
- Investigate safety events to identify causal factors;
- Analyze information from safety reporting, including data about safety failures, defects, or conditions

Safety Performance Monitoring and Measurement

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

Mountain Line has many processes in place to monitor its transit system for compliance with procedures, including:

- Safety audits
- Informal inspections
- Regular review of SEON Bus and Van camera footage, to assess drivers and specific accidents and incidents
- Safety Surveys
- Employee Safety Reporting Program
- Investigation of safety occurrences
- Safety review prior to launch of any new service or procedure
- Data gathering and monitoring of data related to the delivery of service
- Regular vehicle inspections and preventative maintenance
- **New policies or procedures, specifically for Battery Electric Buses**

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

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

Mountain Line monitors safety mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The Safety Manager maintains a list of safety risk mitigations in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

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

The Safety Manager and Safety Committee review the performance of individual safety risk mitigations during their monthly 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 Safety Manager will approve or modify this proposed course of action and oversee its execution.

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

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

The Safety Manager will work with the Safety Committee and the General Manager/CEO to carry out and document all monitoring activities.

Describe activities to conduct investigations of safety events to identify causal factors.

Mountain Line will maintain documented procedures for conducting safety investigations of events, as defined by the Federal Transit Administration, to find causal and contributing factors and review the existing mitigations in place at the time of the event. These procedures also reflect all traffic safety reporting and investigation requirements established by the state and federal regulations.

The Safety Manager maintains all documentation of Mountain Lines investigation policies, processes, forms, checklists, activities, and results. As detailed in Mountain Lines procedures, an investigation report is prepared and sent to the Accident Review Committee for integration into their analysis of the event. Mountain Lines Accident Review Committee consists of 7 members

that represent Management, Operations, Human Resources, Fleet, Facilities, and Safety. The Safety Manager chairs the Accident Review Committee. Mountain Lines Accident Review Committee determines 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.

Describe activities to monitor information reported through internal safety reporting programs.

The Safety Manager and Safety Committee routinely review safety data captured in employee safety reports, safety meetings, customer comments/complaints, and other safety communication channels. When necessary, the Safety Manager and the Safety Committee ensure that the concerns are investigated or analyzed through Mountain Lines Safety Risk Management process.

The Safety Manager and Safety Committee also review internal and external reviews, including audits and assessments, with findings concerning Mountain Lines safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.

Management of Change (Not Required for Small Public Transportation Providers)

Describe the process for identifying and assessing changes that may introduce new hazards or impact safety performance.

Continuous Improvement (Not Required for Small Public Transportation Providers)

Describe the process for assessing safety performance. Describe the process for developing and carrying out plans to address identified safety deficiencies.

7. Safety Promotion

Competencies and Training

Describe the safety training program for all agency employees and contractors directly responsible for safety.

Mountain Lines comprehensive safety training program applies to all Mountain Line employees directly responsible for safety, including:

- Bus operators
- Paratransit operators
- Dispatchers
- Facilities and maintenance personnel
- Fleet personnel
- Managers and supervisors
- Safety and training personnel
- CEO/General Manager and directors
- Office staff

Mountain Line dedicates resources to conduct a comprehensive safety training program, as well as training on Safety Management Systems roles and responsibilities. The scope of the safety training, including annual refresher training, is appropriate to each employee's individual safety related job responsibilities and their role in the Safety Management Systems.

Basic training requirements for Mountain Line employees, including frequencies and refresher training, are documented in the Mountain Line Safety Training Matrix and the Mountain Line Employee Handbook.

Operations safety related training skill training includes the following:

- New-hire bus/paratransit vehicle operator classroom and hands-on skills training,
- Bus/paratransit vehicle operator refresher training,
- Bus/paratransit vehicle operator retraining for post-accident or return to work,
- Classroom and on-the-job training for dispatchers
- Classroom and on-the-job training for operations supervisors and managers.

Vehicle maintenance safety related skill training includes the following:

- Ongoing Fleet technician skill training,
- Ongoing skill training for Fleet supervisors,
- Accident investigations training for Fleet supervisors,
- Ongoing hazardous materials training for Fleet technician and Fleet supervisors,
- Other trainings provided by vendors
- Training for all staff, specifically related to battery electric buses

Mountain Line CEO/General Manager, agency leadership, and Executive Management team must complete the Federal Transit Administration's Safety Management System's Awareness online training.

Safety Communication

Describe processes and activities to communicate safety and safety performance information throughout the organization.

Mountain Lines Safety Manager, Director of Human Resources, and the training department should coordinate safety communication activities for the Safety Management Systems. The activities should focus on the three categories of communication activity established in 49 CFR Part 673:

- **Communicating Safety and safety performance information throughout the agency:**
Mountain Line communicates information on safety and safety performance in its monthly Transit Voice and during staff meetings. Mountain Line also has a permanent agenda item in all monthly Operator meetings dedicated to safety. Information typically covered during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact Mountain Line service or safety performance, and updates regarding Safety Management Systems implementation. Mountain Line also requests from the Operators during these meetings, which is recorded in the meeting minutes. Mountain Lines Safety Manager, Director of Human Resources, and the training staff will also post safety bulletins and flyers on the bulletin boards located in all Operator, Facilities, Fleet, and main office break rooms, advertising safety messages and promoting awareness of safety issues.

- Communicating information on hazards and safety risks relevant to employee’s roles and responsibilities throughout the agency:** As part of new-hire training, Mountain Line will issue safety policies and procedures, included in the Employee Handbook, to all employees. Mountain Line will provide training on these policies and procedures and discusses them during safety talks between supervisors/managers and other staff. For newly emerging safety issues, the Safety Manager will issue bulletins or messages to employees that are reinforced by Operations Supervisors in one-on-one discussions, fitness for duty, or other group discussions with employees.
- Informing employees of safety actions taken in response to reports submitted through the Employee Safety Reporting Program:** Mountain Line will provide targeted communications to inform employees of safety actions taken in response to reports submitted through the Employee Safety Reporting Program, including handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors.

Additional Information

Supporting Documentation

Include or reference documentation used to implement and carry out the Safety Plan that are not included elsewhere in this Plan.

Appendix A – Mountain Line Organizational Chart

Appendix B – Mountain Line Risk Assessment Matrix

Definitions of Special Terms Used in the Safety Plan

Term	Definition

List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
CEO/GM	Chief Executive Officer/General Manager
SMS	Safety Management Systems
VRM	Vehicle Revenue Miles