New Orleans Regional Transit Authority

AGENCY SAFETY PLAN

Effective: January 25, 2022

New Orleans Regional Transit Authority

2817 Canal Street

New Orleans, Louisiana 70119

Concurrences and Approvals

New Orleans Regional Transit Authority Agency Safety Plan

Concurrences:

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Michael J. Smith Chief Safety and Emergency Management Officer SMS Executive	Gerard Guter Interim Chief Operating Officer

Approvals:

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Alex Z. Wiggins
Chief Executive Officer
Accountable Executive

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Flozell Daniels, Jr.
Chairman, Board of Commissioners

Date: _____

RTA Committed to Safety

Contents

Document Revision Policy

This document is intended for use by the position to which it was issued. The control version of this document is stored electronically on RTA's internal shared drive in the folder "Company Policies" and is exclusively maintained by designated Safety Department staff. Printed copies of this document are uncontrolled and may not be current.

This plan is complemented by, and dependent on, other supporting documents issued by RTA and other third parties. The Chief Safety and Emergency Management Officer determines the initial distribution for this document.

Revisions/Amendments

Revision No.	Effective Date	Revised Sections	Purpose
0	1/1/22	NA	Initial Issue

Purpose and Scope

The purpose of the Agency Safety Plan (ASP) is to set forth the requirements for identifying, evaluating and minimizing safety risk throughout the New Orleans Regional Transit Authority's (RTA) public transit system. The ASP design and implementation includes the development of a comprehensive Safety Management System (SMS) as described in the Federal Transit Administration's (FTA) requirements (49 CFR Parts 670, 672, 673, and 674) and follows the Louisiana Department of Transportation and Development (LADOTD, herein referred to as the State Safety Oversight Agency or SSO) State Safety Oversight Program Standard (SSOPS)[1]. The plan incorporates the four components of SMS: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion. The FTA, other federal agencies, and the SSO will have access to review all RTA SMS documentation upon request.

The ASP is specifically developed to:

- Establish the Safety Program for RTA.
- Identify the relationships and responsibilities of RTA with other agencies and organizations that impact transit system safety.
- Provide formal documentation of RTA management's commitment to safety.
- Provide a framework for implementing RTA's safety management policy and related policies and procedures.
- Achieve RTA's system safety goals and objectives in compliance with the National Public Transportation Safety Plan (NSP).
- Satisfy federal, state, and local laws, codes, ordinances, and regulations.

The RTA provides public transportation services to the City of New Orleans, Orleans and Jefferson Parishes, and the City of Kenner. The RTA system includes five streetcar lines, 34 bus routes, paratransit service, and two passenger ferry lines.

Per 49 CFR Part 673.11(f), agencies that operate passenger ferries regulated by the United States Coast Guard (USCG) are not required to develop agency safety plans for those modes of service. In consultation with the Chief Marine Officer (CMO), the Chief Safety and Emergency Management Officer (herein may be referred to as the Chief Safety Officer, or "CSO") or designated staff will oversee contractual safety responsibility by the operator(s) of those services, including safety management program(s) developed and maintained by the operator(s), in accordance with any service agreements in place and with all applicable federal and state requirements. RTA designated staff assigned to safety responsibility may direct operator(s) to non-modal-specific elements of this ASP as necessary to support program development. Application/adoption of any safety requirements, processes, or practices herein will be administered and overseen through separate RTA- and operator-issued policy documents.

Effective December 2020, all positions described in this plan are directly employed by

[1] La. Admin. Code tit. 70 § IX

RTA. Staff serving as project or contract managers are responsible for ensuring contractors comply with the ASP and any referenced policies and procedures.

This ASP will continue to be updated and/or amended, as required, to ensure it aligns with the organization and accurately reflects all aspects of the Safety Program. As SMS Executive, the CSO is directly responsible for updating the ASP to reflect the current operation, in accordance with State and Federal requirements.

RTA's SMS is organized into four components and includes 11 subcomponents aligned with FTA's SMS Framework:

Safety Management System Components

Safety Management Policy 1. Safety Management Policy Statement 2. Safety Accountabilities and Responsibilities 3. Integration with Public Safety and Emergency Management 4. SMS Documentation and Records	**Safety Assurance** 7. Safety Performance Monitoring and Measurement 8. Management of Change 9. Continuous Improvement
Safety Risk Management 5. Hazard Identification and Analysis 6. Safety Risk Evaluation	**Safety Promotion** 10. Safety Communication 11. Competencies and Training

Each subcomponent is addressed in this ASP.

PLEASE NOTE: This ASP outlines RTA's mature SMS. Per FTA guidelines, RTA expects a three- to five-year period to implement all of the programs described in this Plan. There are a number of companion documents to this Plan that describe the tasks, activities, milestones and steps that RTA will implement during that period. These documents include RTA's SMS Implementation Plan (SIP; see APPENDIX E: SMS IMPLEMENTATION PLAN) and individual Corrective Action Plans (CAPs) that each describe steps that will be taken to align with this ASP. Agency progress relative to the SIP and CAPs is provided regularly through other means. For specific implementation status inquiries, contact the Safety Department.

Section I: Safety Management Policy

1.1 Chief Executive Officer's Safety Management Policy Statement

The RTA Safety Management Policy (SAF3) contains the agency's formal Safety Management Policy Statement, and may be accessed on the intranet SharePoint site. It

is reviewed and updated annually, to ensure it aligns with the ASP and vice-versa. As SMS Executive, the CSO is responsible for maintaining and updating the Safety Management Policy in accordance with FTA requirements under 49 CFR Part 673.23.

1.1.1 Safety Performance Targets

Under the requirements of 49 CFR Part 673.11(a)(4), the RTA ASP must address the applicable requirements set in the FTA's NSP and codified at 49 CFR Part 670.

These standards (at present) are associated with National Transit Database reporting requirements as follows:

- **FATALITIES** (total number of reportable fatalities and rate per vehicle revenue miles, or VRM, by mode)
- **INJURIES** (total number of reportable injuries and rate per VRM by mode)
- **SAFETY EVENTS** (total number of reportable events and rate per VRM by mode)
- **SYSTEM RELIABILITY** (mean distance between major mechanical failures by mode)

Safety Performance Measure Definitions (source: FTA Safety Performance Targets Webinar, dated February 4, 2020 -- https://www.transit.dot.gov/sites/fta.dot.gov/files/2020-04/SPT_Webinar_202002.pdf)

- **Fatalities**
  - Death confirmed within 30 days, excluding suicide, trespassers, illness, or natural causes
- **Injuries**
  - Harm to person that requires immediate medical attention away from the scene
- **Safety Events**
  - Collision, derailment, fire, hazardous material spill, or evacuation
- **System Reliability**
  - Major mechanical failure preventing a vehicle from completing or starting scheduled trip

Safety Performance Targets (SPTs) are established annually in coordination with all pertinent departments, members of the executive leadership team, and the SSO. FTA data sources are closely reviewed by the Safety Department to establish baseline targets. These include the NSP and the Bus and Rail Safety Data Reports (BSDR and RSDR, respectively) if available. Additional credible sources may be added to the annual review and update process as they are made available to RTA.

The executive-level safety committee, known as the Executive Safety & Security Committee (ESSC), also reviews and provides feedback on the SPTs as necessary. The annual SPTs are listed in APPENDIX A: 2022 SAFETY PERFORMANCE

TARGETS.

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1.1.2 Annual Review and Update of the ASP

RTA shall review, update, and submit the ASP to the SSO annually in compliance with the requirements of the SSOPS, as codified in La. Admin. Code tit. 70 § IX-1509.

The internal process for review, revision as needed, approval and submission to the SSO is found in RTA Standard Operating Procedure(SOP) 004-002.

1.1.3 Maintenance of the ASP

RTA maintains its ASP in compliance with 49 CFR Part 673.11(c), Subpart D and the SSOPS. The CSO or designee will ensure the current ASP version is promptly disseminated and made available to all employees.

1.2 Safety Management Accountabilities and Responsibilities

In compliance with 49 CFR Part 673.23(d), RTA has established its organizational accountabilities and responsibilities related to its SMS in this section.

1.2.1 Key Individual SMS Accountabilities and Responsibilities

Chief Executive Officer

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA's CEO, as the agency's Accountable Executive, meets the FTA criteria for the designation, per 49 CFR Part 673.23(d)(1). The CEO is ultimately accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS under the requirements of 49 CFR Part 673.23 (d)(1).

As the Accountable Executive, the CEO has the following responsibilities for the SMS:

- Ensuring that the SMS is properly implemented and performed throughout the RTA organization, including employee reporting programs
- Actively and continuously communicating the RTA's SMS Policy throughout the agency
- Ensuring that all executive level personnel are held responsible for implementation of SMS in their respective areas; and each actively and continuously communicates the RTA SMS Policy and the area-specific SMS requirements to all employees in their areas

- Approving this ASP and the TAMP, and knowing and understanding the contents of both documents
- Ensuring that risk is appropriately addressed system-wide; and directing resource allocation accordingly
- Directing required actions to address non-compliance with the ASP
- Managing continuous improvement activities.

Chief – Safety and Emergency Management

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

The CEO has delegated the authority and responsibility for day-to-day implementation and operation of the SMS to the CSO. The CSO serves as the RTA's SMS Executive. The CSO reports directly to the CEO per the requirements of 49 CFR Part 673.23 (d)(2). The CSO chairs the ESSC as the Executive-level Subject Matter Expert (SME) on SMS and Public Transportation Agency Safety Plan requirements and safety program development and implementation.

As the SMS Executive, the CSO is responsible for the day-to-day implementation of SMS. Key safety personnel, technical management, and executive level management operate under the CSO's guidance and direction to support in data collection and analysis, investigations, hazard identification and assessment, corrective action development and implementation, safety committee business, departmental and/or functional area SA and promotion activities, and other safety management undertakings.

The CSO is authorized to take the necessary action to ensure agency personnel have resources, training, and guidance necessary to implement SMS in everyday job performance as required in this ASP.

The CSO guides the areas and departments with information about safety risk management to ensure that they understand the level of safety risk and expectations as to mitigations and/or corrective actions. Once risk is assessed, each department will provide documented results of the assessment(s) to the CSO, who will maintain a master hazard log as necessary. Generally, this process is managed "by exception," meaning areas identified as normal or recurring hazard mitigation or resolution activities (e.g., pre-trip inspections, preventive maintenance, purchase orders) are not re-entered on the CSO's log every day, but rather exceptional events, such as new and previously unforeseen hazards, instances of practical drift, and adverse events will be entered and promptly managed in close coordination between the department and the CSO.

The CSO is responsible for the emergency management function, including preparedness and response in close coordination with local, state, and federal agencies. The position also performs oversight and safety management of the RTA's Memoranda of Understanding (MOUs) and Cooperative Endeavor Agreements (CEAs)

in support of RTA's emergency plans and protocols. Also in this capacity, the CSO provides training for the agency in emergency-related areas including emergency exercises and drills. The CSO and their staff are responsible for developing and implementing an all-hazards approach to emergency planning and response, in close coordination with all other departments.

The CSO performs the following safety-critical activities:

- Developing and maintaining the ASP
- Developing and maintaining RTA emergency operations plans including but not limited to all-hazard plans
- Overall monitoring of the SMS program and ensuring immediate corrective actions are implemented to address deficiencies of the SMS
- Providing primary consultation and guidance on SMS implementation throughout the agency
- Providing information, recommendations and status reports to the CEO on resource allocation supporting the SMS
- Chairing monthly ESSC meetings to address system hazards and other safety concerns
- Conducting independent (but coordinated) SA activities, such as inspections, audits, assessments and observations in the departments as necessary
- Conducting safety promotion activities, such as surveys, stand-downs, and campaigns in coordination with departments
- Maintaining and monitoring CAPs and Hazard Logs for the agency, and supporting and assisting departments in implementing corrective actions
- Overseeing contractor, RTA employee, and the general public's safety during construction activities
- Monitoring and verifying departmental data analysis and trending
- Coordinating with the Chief of Security to ensure the conduct of training as needed with external agencies, i.e., emergency responder training, contractor training, and emergency drills
- Establishing system-wide safety training objectives, training QA activities and training plans and procedures, including a training matrix by position
- Participating in and leading formal meetings with LADOTD, ELT, and other RTA management on safety issues
- Developing and supporting safety and emergency management policies, procedures, and programs
- Implementing the Internal Safety Management Audit (ISMA) Program in compliance with SSO requirements and this ASP
- Overseeing and supporting departmental assessments, investigations, inspections, and SA activities to ensure full compliance
- Supporting the departmental collection and analysis of safety data; and reviewing reports, records and documents of this analysis by departments
- Identifying safety concerns, analyzing reports and information, supporting the development of programs for improving workplace safety

- Assisting in claim investigations of work-related injuries or disabilities and preparing of files for litigation
- Establishing and implementing effective industrial hygiene and occupational policies and procedures for transportation and maintenance functions
- Establishing criteria for the selection, maintenance, and proper use of personal protective clothing and equipment
- Developing mandated training programs
- Developing, implementing, and monitoring the Drug & Alcohol program in accordance with U.S. DOT and FTA requirements.

Chief of Security

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA's Chief of Security reports to the Accountable Executive. The position actively participates on the ESSC and is fully responsible for SMS compliance in Physical Security and Law Enforcement.

The department is responsible for developing, maintaining and implementing a range of plans, programs and processes related to public safety. .

The Chief of Security provides training for the agency in all security-related areas, including exercises and drills, and ensures RTA and contractor personnel receive appropriate security -related training to perform their duties and tasks. Additionally, the Chief of Security conducts regular Threat and Vulnerability Assessments (TVAs) and other audits, examinations, and reviews to assess the agency's readiness and resiliency with regard to security events.

Chief Operating Officer

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA's Chief Operating Officer (COO) reports to the Accountable Executive. The COO actively participates on the ESSC and is fully responsible for SMS compliance in the Operations areas.

The COO has responsibility for the following areas:

A. Modal Operations (except Marine)
B. Maintenance

C. Data Science and Performance Accountability
D. Planning and Scheduling
E. Operations Training
F. Americans with Disabilities Act (ADA) Compliance

As the head of the Operations area, the COO has the following responsibilities for the SMS:

- Ensuring that the SMS is properly implemented and performed throughout RTA Operations
- Ensuring a robust and effective employee reporting program is implemented in Operations
- Actively and continuously communicating the RTA SMS Policy throughout the agency
- Ensuring that all management level personnel are held responsible for implementation of SMS for their spheres of control; and each actively and continuously communicates the RTA SMS Policy and the area-specific SMS requirements to all employees
- Ensuring that safety risk is appropriately addressed department-wide
- Ensuring continuous improvement is implemented throughout the department

1.2.2 Organizational SMS Accountabilities and Responsibilities

All Executive-level managers in the agency also share key SMS responsibilities. As of the adoption of this ASP, the following positions comprise the executive leadership team ("ELT") and share the responsibility to ensure the ASP is followed consistently throughout the organization:

- Chief Executive Officer
- Chief Safety and Emergency Management Officer
- Chief Operating Officer
- Deputy CEO Administration
- Deputy CEO Planning & Infrastructure
- Chief of Staff
- Chief Security Officer
- Chief Marine Officer
- Chief Human Capital and Workforce Development Officer
- Chief Financial Officer
- Chief Diversity, Equity, & Inclusion Officer
- Director of Board Affairs

All functional areas identified in this ASP are safety critical. Managers (all levels) of

functional areas are responsible for the following:

1. Support the service-delivery function of the agency
2. Coordinate with the CSO or their designee to ensure that the level of safety risk associated with any identified hazard in their respective area(s) is maintained at an acceptable level.

The subsections “Common SMS Responsibilities” and “Specific Additional SMS Responsibilities by Level” describe in greater detail the responsibilities and accountabilities owned by each department or functional area, as appropriate.

The current organizational chart showing the organizational relationships described below is found as APPENDIX B: ORGANIZATIONAL CHART. The chart will be updated with each update of this ASP and on an as-needed basis.

1.2.2.1 Common SMS Responsibilities

All functional areas are responsible for the common requirements of SMS listed in this section, as required by 49 CFR Part 673.23(d):

A. Safety Goals and Objectives: the CSO or designee coordinates with each area to establish goals with corresponding objectives that support both Safety Management Policy objectives and SPTs. In consultation with the CSO, each area monitors progress to ensure the goals, objectives, and targets (as applicable) are being met. This is primarily monitored and reviewed in ELT and ESSC meetings.
B. SMS Training:
    a. Rail – Key personnel identified in this ASP as having direct responsibility for safety oversight of the rail fixed guideway system, whether at the direction of or in coordination with the CSO, must meet the requirements of 49 CFR Part 672, including refresher training at 2-year intervals. The regulation requires that personnel to whom this applies must meet the requirements within three years of being hired or promoted into the “key” position.
    b. All Other Personnel – Personnel not identified as Key Personnel are not required to meet 49 CFR Part 672 requirements at this time, however, they should be proficient in SMS methodologies and practices, and knowledgeable about all safety program requirements.
        i. A one-hour, computer-based training module of RTA’s “SMS 101” course is under development and will be included in the mandatory trainings for all employees through the Neogov portal managed by HCWD. At present, it is provided to all new hires during orientation.
C. Employee Safety Reporting Program: all employees share the responsibility to report hazards and safety concerns via approved means. Presently, hazards may be reported via the Safety Hotline, through the Hazard Report Form, directly to Safety Department personnel, to a department manager, or through a safety committee.

D. Hazard Identification, Analysis, and Mitigation: each area is responsible to identify hazards in its daily activities and responsibilities; and to fully document all of these activities, following the direction of the Safety Department. FTA guidance directs the CSO, as SMS Executive, to facilitate or lead department/functional area Safety Risk Management (SRM) and Safety Assurance (SA) activities, as appropriate. Formal corrective actions may be required to address any unacceptable or undesirable safety risk identified through hazard identification and risk analysis.
E. SMS Implementation: all functional areas must assess their own compliance with the RTA ASP and SMS implementation objectives and action items, and regularly brief the CSO on SMS implementation progress. The ESSC reserves time during its monthly meeting for receiving and reviewing implementation status. The Safety Department compiles status notes from all other departments into an Implementation Update which it updates on a quarterly basis.
F. Participation in ISMAs: Progress relative to SMS implementation objectives and compliance with the ASP and referenced policies and procedures are reviewed during recurring ISMAs with each safety-critical function. Before, during, and immediately following each audit, each functional area must be responsive to the requests of the audit team and participate fully. Audits are convened by the CSO in accordance with SOP 004-100: Procedure for Performing Internal Safety Management Audits (ISMAs). (Also see **3.3 Internal Safety Reviews**.)
G. SMS Documentation: requirements of both 49 CFR Parts 673 and 674 indicate that all areas must have formal documentation of all safety management activities. For record-keeping purposes safety management activities are defined as any activity pertaining to one or more of the 11 subcomponents of SMS as directed in this ASP. All SMS documentation must be reviewed as part of the annual ASP review and update process to ensure that any changes to the ASP do not create conflict. The department should consult with the Safety Department for technical assistance.
H. Contractor Oversight: Where applicable, safety management oversight of contractor activities, documentation and safety management processes, and documentation of those oversight activities.

1.2.2.2 Specific Additional SMS Responsibilities by Level

There are three levels of employee responsibility defined at RTA, described in general below:

1. Executive Level Management
2. Technical Management
3. Front-Line Employees

Each functional area is responsible for establishing and reviewing department-specific SMS responsibilities for each of these three levels consistent with the general responsibilities described in this section. The executives for each area will ensure that each employee is annually evaluated on safety performance related to those SMS

responsibilities.

In addition to the shared responsibilities described above, the additional SMS responsibilities for each level are as follows:

Executive level:

Executives are charged with effectively leading safety management processes and activities in their respective area(s), and actively demonstrating their commitment to safety. They accept their respective responsibilities for implementing both this ASP and the Safety Management Policy, as well as all other referenced policies and procedures. Specifically, they must ensure and be accountable that:

1. Adequate resources are available to appropriately manage safety risk in their areas.
2. Effective mitigation and corrective actions are developed, implemented in a timely fashion, and monitored appropriately to assure safety is maintained, as appropriate.
3. There are no barriers to employee reporting of safety hazards and issues, and that reports are promptly addressed through the safety risk management process.
4. Safety management is fully documented, managed and monitored at all times.
5. Safety performance goals and objectives, both in their areas of control and agency-wide, are being met, and safety performance measures, including SPTs, monitored for verification or needed corrective action.
6. They participate fully in the ESSC and other safety committee processes.
7. Safety is a core business function in their areas and departments.
8. Safety information is shared openly with the Safety Department and all other departments in support of the SMS.
9. All significant changes are properly managed in accordance with the Management of Change section of this ASP.
10. Safety investigations, audits, inspections, and corrective actions are managed using the organizational approach; that is, focusing on organizational deficiencies and systemic issues instead of individual actions taken or errors committed by front-line employees, where feasible.
11. Adequate safety training, awareness and oversight is provided to employees in their areas of control.
12. A positive safety culture is actively fostered in their area and system wide.
13. Full and open cooperation is affected with State Safety Oversight activities, federal authorities and other external safety agencies as required.

Technical management level:

Technical managers (typically, senior directors, directors, and managers) are charged with the following:

- ensuring directives are implemented from the executive level in safety

management,
- promptly informing executives of safety lapses, failures, hazards and resource shortages,
- visibly demonstrating commitment to safety,
- providing tools and resources needed to safely perform job requirements,
- providing information pertinent to the management of safety to employees, and
- encouraging the reporting of hazards and assuring safety is incorporated in all task and activities on a daily basis.

Technical Management must personally ensure and be accountable to:

1. Take strategic direction from the Executive level in all aspects of safety management, including daily activities, hazard and safety risk management, safety data, investigations, employee reporting, and other safety management information particular to their areas of control, as appropriate.
2. Ensure employees receive proper training to perform job functions safely.
3. Ensure employees are properly supervised to ensure tasks and activities are safely managed and performed.
4. Ensure that employee reports of hazards are properly investigated, mitigated as appropriate and reported to executive management and/or the Safety Department as appropriate; and employees are kept apprised of activities concerning their reports.
5. Ensure that contractors and vendors are educated on RTA safety practices and are held to the same requirements.
6. Coordinate implementation of safety mitigations and SA activities with the Safety Department as appropriate.
7. Monitor and endorse proper safety promotion and awareness activities.
8. Implement management of change activities in coordination with the Safety Department.
9. Identify organizational failures with Executive management, and cooperatively work to implement mitigations and corrective actions to address failures.
10. Participate actively in the safety committee process as directed and assigned, including preparing, reviewing, and sharing safety information.
11. Foster a positive safety culture system wide.
12. Cooperate fully and openly with State Safety Oversight activities, federal authorities and other external safety agencies as required.

Front-Line employees:

Front-line employees are expected to:

1. Promptly recognize and report all hazards and/or potential consequences of hazards that, without mitigation, would result in an unacceptable level of safety risk, coordinating with the Safety Department as necessary.
2. Fully participate in the safety committee process as appropriate.
3. Attend training that will aid in safe job performance.
4. Safely carry out assigned tasks.

5. Communicate effectively with other employees, supervision and management.
6. Foster a positive safety culture system-wide

Each of the safety-critical areas below is fully documented through area/departmental programs, policies, plans, procedures, and protocols developed under the authority and responsibility of the Managers of each area. These documents contain detailed information on all functions, tasks and activities, and are available from the Managers, including how safety is managed in every aspect of operations in each area.

Modal Operations

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

Rail and Bus Service

RTA's Rail and Bus Operations departments each report to the Senior Director of Bus & Rail Operations who in turn reports to the COO.

The departments perform safety-critical functions in the following areas:

A. Streetcar and fixed-route bus operations
B. Yard operations
C. Operations training
D. Service quality assurance/quality control
E. Special event planning and response
F. Safety event reporting and investigation, in coordination with the Safety Department

Safety-critical activities for each area are described below.

Rail Operations is responsible for:

- Managing safety in all departmental functions, including appropriate hazard identification, analysis and mitigation, and safety assurance on those mitigations
- Supporting SMS system-wide, including investigations, audits, and assessments
- Training, assigning and monitoring rail operators, and rail supervisors
- Maintaining, reviewing and revising of the Rulebook in coordination with the CSO
- Implementing rules compliance programs for rail operators, dispatchers and rail supervisors, and ensuring service quality assurance and quality control
- Reporting key performance indicators, operational data and other performance measures associated with daily tasks and activities to appropriate parties
- Investigating and managing customer complaints and corrective action
- Investigating employee reports of hazards and taking corrective actions as necessary
- Equipment inventory and tracking

- Managing employee discipline
- Safety messaging
- Ensure representation for all classes of front-line employees on appropriate employee safety committees

Bus & Rail Communications

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA's Director of Bus and Rail Communications reports directly to the COO and is responsible for two critical areas: depot clerks and the Operations Control Center (OCC). Each division within Bus & Rail Communications consists of a manager and one or more supervisors.

Safety-critical activities are described below:

- Control of employee sign-in, attendance procedures, run assignments, yard supervision, and discipline in accordance with agency rules and procedures
- Conduct of visual fitness-for-duty checks upon operator sign-in for duty
- Dissemination of safety-critical drivers' alerts and other notices
- Managing and directing control center operations and safety
- Responding to and managing of operational emergencies
- Coordination and communication with other departments system-wide, including Fixed-route operations for bus bridges when needed
- Dispatching operations supervisors to incidents and accidents as necessary, and closely coordinating with Safety and Security departments
- Safety messaging

Maintenance

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA's Director of Rail Maintenance, Director of Bus Maintenance, and Quality Assurance Maintenance Manager all report to the COO.

Maintenance is responsible for the following safety-critical activities:

A. Transit Asset Management
B. Maintenance Training
C. Warranty Programs
D. Maintenance
    a. Streetcar Maintenance
    b. Rail Infrastructure Maintenance (Power, Signals, Rail, Grounds)
    c. Vehicle Maintenance (including vehicle-borne fare equipment and radios)

d. Materials Management

E. Maintenance Quality Assurance

Safety-critical activities for these areas are described below.

- Ensuring proper training of all new mechanics and technicians to safely and effectively inspect, maintain and repair the agency's fleet, and all maintenance staff in emergency/safety procedures and injury and illness prevention as appropriate
- Administering warranty programs for rolling stock and equipment
- Streetcar Maintenance Activities
    - Assuring that the rail car fleet is properly maintained and available in safe operating condition according to RTA's procedures
    - Providing necessary mechanisms for reporting defects and hazardous conditions
    - Administering and monitoring standardized programs, policies, and procedures, and the Rail Maintenance Plan
    - Ensuring appropriate action to resolve reported or otherwise identified hazards in a timely manner. As appropriate, coordinating the development and testing of engineering solutions as a means of addressing vehicle related hazards
- Vehicle Maintenance
    - Assuring that the vehicle fleet is properly maintained and available in safe operating condition according to RTA's procedures
    - Providing necessary mechanisms for reporting defects and hazardous conditions
    - Administering and monitoring standardized programs, policies, and procedures, and the Vehicle Maintenance Plan
    - Administering safety programs for department employees
    - Ensuring appropriate action to resolve reported or otherwise identified hazards in a timely manner. As appropriate, coordinating the development and testing of engineering solutions as a means of addressing vehicle-related hazards
- Rail Infrastructure Maintenance (Including Maintenance-of-Way, or MOW, and Traction Power)
    - Assuring that infrastructure is properly maintained and available in safe operating condition according to RTA's procedures
    - Providing necessary mechanisms for reporting defects and hazardous conditions
    - Implementing the agency's Roadway Worker Protection program to ensure employee and contractor safety along the entire streetcar trackway
    - Administering and monitoring standardized programs, policies, and procedures, and the Rail Maintenance Plan
    - Monitoring safe handling of and minimizing employee and environmental exposure to potentially hazardous products and materials.
    - Ensuring appropriate action to resolve reported or otherwise identified

hazards in a timely manner
    - As appropriate, coordinating the development and testing of engineering solutions as a means of addressing infrastructure-related hazards
    - Serving as liaison with various municipalities and other external agencies for hazard resolutions involving infrastructure
- Materials Management
    - Assuring that materials, supplies, equipment and parts under the care and custody of the area are stored, accessed and distributed safely and appropriately according to RTA procedures
    - Accounting for inventory
    - Providing necessary mechanisms for reporting defects and hazardous conditions
    - Coordinating with the CSO on safety requirements of materials
    - Monitoring safe handling of and minimizing employee and environmental exposure to potentially hazardous products and materials.
- Maintenance Quality Assurance
    - Ensuring all documentation requirements of maintenance activities are fully implemented in conformance with regulations and the requirements of the SMS
    - Where applicable, participating in the development of technical equipment specifications and procedures that address the safety requirements of regulatory agencies and RTA
    - Ensuring that replacement equipment and modifications meet safety requirements prior to acceptance, installation or implementation
    - Examining equipment and systems to explore the potential for increased efficiencies and improvements in safety as well as in performance
    - Coordinating major equipment rebuild, repair, and retrofits
    - Monitoring the performance of preventive maintenance efforts and all other contractor activities
    - Ensuring there are no unauthorized modifications to vehicles and equipment

Data Science and Performance Accountability

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Director of Data Science and Performance Accountability reports to the Director of Data Science reporting to Senior Director of Long Range & Strategic Planning who in turn reports to the Deputy CEO of Planning and Infrastructure
. The position performs the following safety-critical functions through data collection and analysis:

- Ensuring performance accountability of all departments, including progress relative to SPTs and other Key Performance Indicators
- Ensuring continuous improvement of the SMS

The Director is committed to the exploration of increasing the effectiveness and efficiency of the RTA through data collection and analysis and will propose and implement improved data processes under the direction of the COO.

Planning and Scheduling

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Transit Planning Director reports to the Senior Director of Operations who in turn reports to the COO. The Director is fully responsible for SMS compliance in the transit planning area.

The Transit Planner performs the following safety-critical activities:

- System route analysis
- ADA and FTA regulations and requirements concerns in planning
- Station locations and amenities
- Accessibility issues regarding RTA facilities and bus stops
- Community outreach

A responsibility of the Transit Planning Director that supports RTA's Management of Change processes which are required under Safety Assurance is to incorporate a safety risk management review into the service pick process, to ensure that hazards and accident/incident trends are taken into consideration. This review process is iterative throughout the year but at a minimum consists of a coordination meeting with the Safety Department at a point during each service pick that allows for minor adjustments to be made, as necessary, prior to commencement of service. Other, long-range mitigations recommended by the Safety Department during this coordination may be addressed through other steps the Planning Department undertakes pursuant to its Service Standards SOP. If necessary (based on the associated level of safety risk), the CSO formally tracks long-range mitigations to completion, through either Mitigation Monitoring Plans or CAPs.

Additionally, for phased implementation of large transit network redesign projects, the Transit Planning Director involves Operations supervisors and training instructors, as well as Safety Department representatives, to conduct joint assessments of bus and streetcar routes. The topics reviewed during these assessments may include any combination of: schedule (times of day), service frequency (headways), route alignment, vehicle dynamics, interface with signals or other components of the street network, and placement of transfer points or hubs.

Operations Training

Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA's Manager of Operations Training reports to the Senior Director of Operations who in turn reports to the COO. The Manager is fully responsible for SMS compliance in the development and delivery of training—including mandatory refresher, post-accident, and recertification training—for transit operators, supervisors, and maintenance personnel.

The Manager of Operations Training performs the following safety-critical activities:

- Development and delivery of official agency training curricula materials, including for safety-critical positions, tasks, activities, processes, methods, and programs
- Safety training program development and quality assurance
- Monitoring of training records and oversight of final training evaluations
- Training needs assessments in consultation with other Operations departments and in alignment with agency procedures
- Post-accident re-training based on deficiencies or non-compliances found during accident/incident investigations by Operations and/or Safety
- Simulator training
- Quality assurance evaluations ("ride evaluations" or "ride checks") and follow-up coaching with operators as necessary
- Rail operator re-certification and rulebook adherence
- New-hire training for Operations employees on SMS principles, including hazard identification and reporting

Chief Financial Officer (CFO)

Safety Policy, Safety Risk Management, Safety Assurance Responsibilities and Activities

RTA's CFO reports to the Deputy CEO Administration. The CFO actively participates on the ESSC and is fully responsible for SMS compliance in the Financial Operations areas.

Safety-critical activities for Financial Operations are related to the provision of accurate and timely financial services to stakeholders while fostering accountability. One of its primary functions is keeping the Accountable Executive informed of resource allocation and availability in the service of safety management.

A function reporting to the CFO, the Office of Internal Audit and Compliance, is responsible for conducting the Internal Safety Management Audit of the Safety Department. Previously, this was assigned to the Security Department.

The Chief Financial Officer has the responsibility for the following areas:

A. Budget Development and Administration
B. Grants Administration
C. Procurement

D. Third Party Audit
E. DBE Compliance
F. Revenue Collection
G. Accounting

Budget Development and Administration

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Budget Development and Administration Analysts report to the CFO. The Analysts are fully responsible for SMS compliance in the Budget Development and Administration area.

The Analysts have the responsibility for the following safety-critical activities:

- Preparation and monitoring of the annual budget in coordination with executive management and all RTA departments.
- Analysis of activities that have financial impacts
- Reporting to the agency and the RTA Board on financial matters on a regular basis
- Identifying any issues that threaten the RTA's financial ability to provide safe service or its fiduciary duties

Grants Administration

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Director of Grants reports to the CFO. The Director is fully responsible for SMS compliance in the Grants Administration area.

FTA's expectation is that systems apply for all grants available to support the safety management program. Grants supply essential capital resources for safety management, and are, therefore, a safety-critical activity.

The Director has the responsibility for the following safety-critical activities:

- Planning, directing, and evaluating the preparation and submission of all grant applications, including the conduct of necessary public hearings, for Capital Improvement programs, operating assistance, flexible funding, and research development and technical studies
- Implementing and managing approved grant programs, from inception to close-out, in compliance with Federal regulations and procedures
- Preparing and presenting of major oral/written reports and other documents relating to budget and to grants management
- Coordination with all departments and the Regional Planning Commission on grant status and activities

Procurement

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Procurement Director reports to the CFO and is fully responsible for SMS compliance in the Procurement area.

The primary safety management activities of procurement are to ensure that safety principles, requirements and representatives are included in the procurement process. In coordination with, or at the direction of, the CSO, the Director assesses the level of safety risk associated with procurements. Additionally, safety must be managed in storage, warehousing, transportation, accounting, distribution and disposal of all assets managed through the department. This includes ensuring that information acquired in the procurement process is effectively communicated to the end users.

Revenue Collection

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Manager of Revenue Collection reports to the CFO. The Manager is fully responsible for SMS compliance in the Revenue Collection area.

Revenue collection manages the safety- and mission-critical functions of revenue collection and reconciliation, and all aspects of fare media management. The Department uses contractors for security and money transport.

Accounting

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Director of Accounting reports to the CFO. The Director is fully responsible for SMS compliance in the Accounting area.

The Director is responsible for the safety-critical tasks of management of accounting in payroll, accounts payable and receivable, inventory, general ledger, tracking purchases and depreciating fixed assets, etc., as well as preparing required reports on financial transactions and other activities. Accounting also monitors financial activities for fraud and theft.

Accounting also provides National Transit Database (NTD) reporting for financial,

schedule, ridership and maintenance reporting through the NTD online portal.

Chief of Staff

Safety Policy, Safety Risk Management, Safety Assurance and Safety Promotion Responsibilities and Activities

RTA's Chief of Staff (COS) reports to the Accountable Executive. The COS actively participates on the ESSC and is fully responsible for SMS compliance in the Administration areas.

The COS has the responsibility for the following areas:

A. Innovation and Policy
B. Intergovernmental Affairs
C. Communications and Marketing
D. Customer Service

Customer Service

Safety Policy, Safety Risk Management, Safety Assurance and Safety Promotion Responsibilities and Activities

RTA's Director of Customer Service reports to the COS. The Director is fully responsible for SMS compliance in the Customer Service area which consists of the call center that manages customer inquiries, complaints, and paratransit reservations, known as "Rideline," and the ADA Eligibility and Identification (ID) card center.

The Director of Customer Service has the responsibility for the following safety-critical activities:

- Oversight, monitoring and supervision of the customer service team
- Monitoring and ensuring proper handling of consumer complaints, suggestions, commendations, miscellaneous calls and correspondence relating to the agency
- Investigating complaints and concerns, employee reports of hazards and other required events, including coordination with other departments and preparing reports as necessary
- Collecting and performing trend analysis on customer and employee reports, concerns, and complaints
- ADA and reduced fare program eligibility and customer relations
- ADA compliance
- Coordinating with community organizations, non-governmental organizations, city and local agencies, passenger advocacy groups, and the public to ensure that concerns regarding ADA and the needs of vulnerable populations are met in RTA service
- Provides internal and external training and other resources on ADA compliance issues and RTA service for vulnerable populations

Intergovernmental Affairs

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Director of Intergovernmental Affairs reports to the COS.
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The Director has the responsibility for the following safety-critical activities:

- Community and government relations for RTA issues and operations
- Outreach to community organizations/stakeholders.

Communications and Marketing

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

RTA's Communications and Marketing team, led by a director and two managers, reports to the COS.
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Marketing and Communications is responsible for public relations, marketing and retail sales, streetcar charters, advertising, film production and creative services. The Director also serves as RTA's Public Information Officer (PIO) and in that capacity, he/she provides liaison with the public and external stakeholders during emergencies. This information is safety-critical in many respects, especially regarding adverse events and other emergency situations.

Human Capital and Workforce Development

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA's Chief Human Capital and Workforce Development (HCWD) Officer reports to the Accountable Executive. The Chief HCWD Officer is fully responsible for SMS compliance in the HCWD area.

The Chief HCWD Officer manages hiring, employee information, worker's compensation, administrative organizational development, and employee programs. HCWD is responsible for assuring that staff positions are effectively defined and classified and that qualified personnel are identified to meet staffing needs. This department also manages the contracted employee assistance programs, including the program for substance abuse.

Safety-critical activities include:

A. Talent Acquisition
B. Employee Relations
C. Talent Management
D. Compensation
E. Benefits
F. Employee Assistance Program (EAP)
G. Equal Employment Opportunity (EEO) Compliance
H. Document Management
I. Worker's Compensation matters

Safety Critical activities in this area include:

- Coordinating of safety-critical pre-employment activities, including investigations, testing, DOT physicals, qualifications review and legal compliance in hiring
- Maintaining job descriptions incorporating SMS responsibilities and requirements; distribution of the descriptions appropriately as needed and requested
- Accurately documenting hiring and other employment processes
- Managing recruitments based on direction from ELT and approved criteria
- Employee pre-employment assessments
- EAP, including wellness services, including nutrition, injury prevention, financial counseling and physical and mental health

Planning and Infrastructure

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA's Deputy CEO Planning and Infrastructure reports to the Accountable Executive. The position actively participates on the ESSC and is fully responsible for SMS compliance in the Planning and Infrastructure areas.

The Deputy CEO Planning and Infrastructure has the responsibility for and oversight of the following areas:

A. Safety and Security Certification and the Safety and Security Certification Program Plan (SSCPP)
B. Facilities Maintenance
C. Environmental Compliance
D. Information Technology (IT)

As required, the Infrastructure Department may be assisted by a Program Management Consultant and Construction Management Consultant, General Architectural and Engineering Consultant, and contractors. The Director will ensure that all contractors and consultants comply with the provisions of this ASP.

The Safety and Security Certification process is governed by the SSCPP, which is maintained by the Deputy CEO Planning and Infrastructure in coordination with the CSO. Infrastructure staff follow the guidelines contained in the SSCPP to determine whether a capital project or system modification requires safety and security certification. (Also see 3.6.1 Safety and Security Certification.)

Facilities Maintenance

Safety Policy, Safety Risk Management, and Safety Assurance Responsibilities and Activities

Facilities Maintenance Safety-critical Activities:

- Assuring that facilities are properly maintained and accessible in safe operating condition according to RTA's procedures
- Providing necessary mechanisms for reporting defects and hazardous conditions
- Coordinating with the CSO on safety requirements
- Administering and monitoring standardized programs, policies, and procedures, and the Facilities Maintenance Plan
- Ensuring appropriate action to resolve reported or otherwise identified hazards in a timely manner
- As appropriate, coordinating the development and testing of engineering solutions as a means of addressing facility hazards
- Assuring compliance with local, State, and Federal environmental protection and hazardous waste requirements.

Information Technology

Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion Responsibilities and Activities

RTA’s Director of Information Technology (IT) reports to the Deputy CEO Infrastructure and Planning. The Director is fully responsible for SMS compliance in the IT area.

Information technology activities and systems require continuous management of risk and are safety-critical. IT is responsible for installing, maintaining and replacing hardware, firmware and software; investigating new technologies, and supporting agency-wide information management and protection.

IT provides and supports the following safety-critical areas and activities:

- Development and promulgation of IT policies, procedures and standards
- Desktop computer access
- Network access
- Telephone systems
- Applications
- Notification of system outages for internal and external customers
- Data warehousing

- Passenger Information Display Signs (PIDS)
- Computer-Aided Dispatch (CAD) and Clever Devices tools for OCC
- Fare systems
- Ron Turley system for Maintenance
- Risk and vulnerability assessments of IT systems agency-wide
- Security badging
- Instructional services for use and protection of information technology systems and processes

IT also manages several contract employees and vendors. IT is responsible for providing safety management oversight of these contractors and vendors, including compliance with this ASP.

IT's Fleet Technology division is responsible for maintaining in-vehicle technologies including fare collection equipment, audio/video surveillance equipment, CAD mobile units, Public Address (PA) systems, and two-way radios.

Key SMS Personnel with Direct Responsibility for Rail Fixed Guideway Safety Oversight

Apart from the level- and department- specific SMS responsibilities described above, certain key SMS personnel [49 CFR Parts 673.23(d)(4) and 673.29] are considered to have a direct responsibility for safety oversight of the rail fixed guideway, and as such, must comply with FTA's Public Transportation Safety Certification Training Program (PTSCTP) codified at 49 CFR Part 672. These employees and contractors have the responsibility to ensure that their respective area(s) has/have a fully implemented and robust safety management program. As of the adoption of this revision of the ASP, the key SMS personnel are:

- CSO
- All members of the Safety Department
- All contractors actively supporting the Safety Department.

The Safety Department, under the CSO's direction, coordinates a review of the status of required training per the PTSCTP during the annual review and revision of the ASP. The CSO maintains a safety training matrix for the key SMS positions and pursues external training opportunities in support of meeting these training needs by the specified compliance dates, to the extent practicable, e.g., FTA, Transportation Safety Institute (TSI), the National Safety Council. Key SMS personnel are responsible for complying with PTSCTP and internal SMS training requirements, including refresher training every two years. (Also see **4.1 Competencies and Training**.)

1.3 Integration with Emergency Management

RTA develops, maintains, and implements all emergency management documentation

as required by 49 CFR Part 673.11(a)(6), hereby incorporated by reference. Jurisdictional agreements, including Memoranda of Agreement/Understanding (MOU/MOA), are also maintained by RTA.

Emergency Management functions are subject to the requirements of Section II of this ASP, Safety Risk Management. Corrective actions arising out of emergency management functions, including drills, workshops, exercises, and After Action Reports, are the responsibility of the CSO unless otherwise noted in the CAP.

The CSO ensures that resources are properly allocated to support emergency management functions in a manner that achieves SMS goals and objectives and addresses any SMS deficiencies. The CSO may use ESSC and/or ELT meetings and proceedings to ensure a strong level of cross-departmental coordination on emergency management matters. Additionally, the CSO participates in and leads coordination meetings with City/regional stakeholders to discuss upcoming activities or initiatives, such as training, joint exercises, and external outreach campaigns.

The documentation listed below specifies primary agency-wide documents to manage emergency management functions, although this list is not exhaustive:

1. Memoranda of Understanding/Agreement with law enforcement and emergency management partners
2. Emergency Preparedness Plans, including “All Hazards” Plans
3. Emergency Exercise and Drill Policies and Procedures
4. After Action Reports
5. Continuity of Operations Plans (COOPs)

1.4 SMS Documentation

Per the requirements of 49 CFR Part 673.31, RTA maintains all documentation incorporated here by reference for at least three years, in all versions, and will make them available as requested or required to the SSO, the FTA or other federal agencies having jurisdiction and authority. Other documents subject to other statutory compliance requirements (industrial safety, environmental, etc.) will be maintained according to law.

The CSO coordinates with each ELT member to identify and address process deficiencies or documentation gaps in their respective area(s) through a combination of the following: Safety Department-led Safety Assurance activities, ESSC and other safety meetings, Internal Safety Management Audits, and one-on-one workshops.

Documents that have a direct interface with this ASP are listed in APPENDIX D: LIST OF SAFETY POLICIES AND STANDARD OPERATING PROCEDURES.

An up-to-date list of controlled, final versions of policies is maintained on the Intranet

SharePoint site.

Section II: Safety Risk Management

Under the requirements of 49 CFR Part 673.25(a), transit agencies must develop and implement a Safety Risk Management (SRM) process for all elements of the system.

RTA's formal SRM process incorporates all FTA requirements to: identify existing and foreseeable hazards, identify reasonable consequence(s) of those hazards that may result in adverse events, analyze those consequences to evaluate the level of safety risk, and establish and prioritize mitigations to reduce the level of safety risk to the lowest practicable level.

SRM encompasses the use of safety analysis tools by adequately staffed and trained personnel and departments, groups and committees at RTA, as well as the use of SMEs wherever appropriate, at the discretion of the CSO.

In addition, the SRM process at RTA is integrated with its SA program to ensure that safety risk mitigations are evaluated for effectiveness over time. SA processes are described in Section III.

2.1 Hazard Identification

All department managers are required to identify hazards, report them and mitigate them appropriately. All employees and contractors share a responsibility to identify and report hazards using a variety of methods established by RTA..

2.1.1 Hazard Identification Sources

There are a variety of sources for hazard identification. RTA uses the following sources for hazard identification:

1. Reactive hazard identification involves analysis of events or outcomes that have already occurred. Hazards are identified through investigation of safety occurrences (including close calls), adverse events and hazard reporting from the field (such as rules compliance activities, safety committee meetings and customer reports) where adverse outcomes have been experienced in the system.
2. Proactive hazard identification involves real-time situations, such as through departmental inspections, audits, evaluations, observations and assessments; proper management of change; training quality assurance programs; and the employee and contractor safety reporting programs. Job Hazard Analyses (JHA) identify and support a thorough analysis of hazards that may reasonably be encountered during the performance of a specific job or task. RTA actively seeks to identify hazards and mitigate them effectively before adverse events occur.
3. A specialized subset of proactive hazard identification is predictive identification, which involves the thorough and timely analysis of safety data collected by all departments to identify possible negative future outcomes or events; as well as

monitoring the system in real time.
4. FTA and SSO data and information as required by 49 CFR Part 673.25(b)(2), as well as industry experience, best practices, and lessons learned.

2.1.2 Employee Reporting Systems

RTA has multiple avenues by which employees and contractors can report hazards. Investigations of hazards are also properly documented per SOP #004-005, and distributed according to that SOP.

Employees are encouraged to report hazards through their chain of command, including their immediate supervision, or management if supervision is not available; through the safety committee process; or by contacting the Safety Department directly.

Frontline Operations Department personnel also have the option of writing a description of the hazard or safety concern on a “Hazard Report Form” and submitting it any of three labeled drop-off boxes: A. Philip Randolph (Canal) facility, Carrollton facility, or East New Orleans facility.

RTA employees and contractors can also submit hazard information via a Safety Hotline, which has the following options:

- Telephone – (504) 827-8367 (available 24 hours a day, 7 days a week)
- Email – safetyhotline@rtaforward.org

Submitters have the option of reporting anonymously or confidentially to the Safety Hotline.

Designated Safety Department staff enter, track, monitor, analyze, and close hazards, or “tickets” through a cloud-based software application. This tool provides staff with the ability to conduct trend analysis as well as manage key performance metrics such as: time to closure, issues by location, issues by bus/streetcar stop, department(s) responsible for resolution, and associated Safety Risk Index (SRI).

Note: Additional training and internal outreach materials are currently in development. Safety and IT are exploring other means of reporting hazards online, such as an accessible, web-based “Help Desk” system that is linked to the RTA SharePoint site.

Customer Service manages customer safety complaints, which are forwarded to the responsible department and the CSO as applicable. The department investigates the report and develops and implements corrective action as needed, in coordination with the Safety Department. Employees can also use this process as an anonymous option.

No matter what the source of information is or which department investigates and resolves the issue, the feedback loop to the reporting employee is required, as applicable. For hazards or issues that are deemed “unacceptable” following the SRM

process, the outcome of the report, investigation, corrective action, or mitigation is distributed to the ESSC and in turn to each Departmental Safety Committee (or if a DSC is unavailable, to the department management for local dissemination). (Also see Section IV – Safety Promotion.)

Protections for Employees Reporting Adverse Safety Conditions

RTA is committed to maintaining a robust positive safety culture. As part of that commitment, RTA will protect employees who report adverse safety conditions to management. As explicitly directed in the RTA Safety Management Policy (SAF3), any employee who reports a valid violation, unsafe act or condition, or other safety concern to management will not experience any reprisal from management. Each report will be thoroughly investigated under the direction of the CSO, and, if the employee has not reported anonymously, the CSO will ensure that the results of the investigations and any corrective action will be reported back to the reporting employee.

If an employee reports and requests anonymity, the RTA will provide anonymity for all valid concerns.

Unprotected Self-Reporting

No willful violations will be subject to self-reporting protections. This includes but is not limited to any violations of Drug and Alcohol policies or requirements, criminal acts, or failure to report any criminal acts immediately.

2.1.3 Hazard Investigation

Hazards are investigated in each department as they are reported or identified. Department management identified in this ASP are primary points-of-contact for the investigatory activities, and shall route investigations to the Safety Department for additional technical support, as necessary, in accordance with SOP #004-005. All investigative activities are properly documented according to the SOP.

In consultation with the Safety Department, the department point-of-contact first analyzes the hazard by identifying potential consequences. The purpose of investigation is to evaluate each hazard in terms of the level of safety risk associated with the worst credible outcome; and to examine the likelihood and severity of those consequences occurring. The worst credible consequence is defined as what the agency expects to be a realistic and imaginable consequence of the hazard.

RTA defines safety risk severity categories as a qualitative measure of the worst credible outcome, as indicated in Table 1.

Category	Description	Severity Definitions
1	Catastrophic	Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies may cause dire

Category	Description	Severity Definitions
		events resulting in major system loss, thereby requiring immediate cessation of the unsafe activity or operation.
2	Critical	Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies may cause severe harm to persons or major system damage thereby requiring immediate action including immediate cessation of the unsafe activity or operation.
3	Marginal	Operating conditions may cause minor harm or minor system damage such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies can be counteracted or controlled without serious injury, illness or major system damage.
4	Negligible	Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies will result in no, or less than minor, harm or system damage.

Table 1: Safety Risk Severity

RTA defines safety risk likelihood, or probability, as a measure of frequency relative to any of: a unit of time, the duration of an activity, the life of an item, or the life of a total fleet/inventory, as indicated in Table 2.

Frequency	Level	Probability Definitions
Frequent	A	Likely to occur frequently to an individual item. Continuously experienced in the fleet inventory.
Probable	B	Will occur several times in life of an item; will occur frequently in fleet/inventory.
Occasional	C	Likely to occur sometime in life of an item; will occur several times in fleet/inventory.
Remote	D	Unlikely, but possible to occur in life of an item; unlikely but can be expected to occur in fleet/inventory.
Improbable	E	So unlikely, it can be assumed occurrence will not be experienced to an individual item; unlikely to occur but possible in fleet/inventory.

Table 2: Safety Risk Likelihood

Staff may use either inductive or deductive evaluation methods, depending on circumstances to determine ratings for severity and likelihood.

2.2 Safety Risk Assessment and Prioritization

Safety Risk assessment and prioritization criteria are established through the process documented in this section. All official risk assessment and prioritization activities and any required actions developed as a result of assessments, will be led by the CSO or designee. Once the severity and likelihood of the worst credible outcome have been established, the Safety Risk Index (SRI) can be calculated; i.e., the level of safety risk as a composite of severity and likelihood of the potential consequence of the hazard (Table 3).

SAFETY RISK INDEX

Frequency of Occurrence	1	2	3	4
A	1A	2A	3A	4A
B	1B	2B	3B	4B
C	1C	2C	3C	4C
D	1D	2D	3D	4D
E	1E	2E	3E	4E

Table 3: Safety Risk Index

The SRI and safety risk acceptance criteria (Table 4) are reviewed to determine "acceptance" of the increased level of safety risk that was assessed—or that which will exist if left unmitigated. This is level of safety risk acceptance is classified as one of the following: high, medium, low, or acceptable.

The CSO is responsible for determining the SRI and using it to establish a shared understanding across the affected department(s) and/or functional area(s) of the necessity to mitigate or reduce the level of safety risk. The CSO determines whether the assessed level needs to be prioritized based on safety risk acceptance.

SAFETY RISK ACCEPTANCE CRITERIA			
	SRI	**Decision Authority**	**Special Conditions**
High	1A, 1B, 2A, 2B, 3A	Unacceptable	Requires immediate resolution*
Medium	1C, 1D, 2C, 2D, 3B, 3C	Undesirable	Actions require ESSC and CSO review and approval, with concurrence from the CEO*
Low	1E, 2E, 3D, 3E, 4A, 4B	Acceptable with Review	Requires management review in consultation with CSO or designee
Acceptable	4C, 4D, 4E	Acceptable	None – Can be managed at department-level

Table 4: Safety Risk Acceptance Criteria

* For hazards/consequences rated "high" or "medium," the SSO must be notified as soon as practicable or no later than the conclusion of the safety risk assessment.

If the hazard is currently mitigated, investigation involves an assessment of the effectiveness of current mitigations—that is, a determination of whether they are sufficient to address the associated risk, and if changes or additional mitigations are warranted to further reduce risk (until it reaches an acceptable level).

Based on the approved decision authority level that results from the safety risk assessment—unacceptable, undesirable, acceptable with review, or acceptable—the department performing the assessment is responsible for notifying the appropriate parties immediately, if they are not already involved. If the ESSC must be notified, the CSO and COO (Chair and Co-Chair, respectively) will coordinate next steps which may include calling an emergency meeting of the ESSC as appropriate.

2.3 Safety Risk Mitigation

Safety Risk Mitigations are methods or processes to manage safety risk agency-wide. Once an unacceptable level of safety risk is assessed, RTA must ensure that it is not accepting the risk without the proper level of management involvement, per the SRM process specified in this ASP.

Strategic decisions are made to ensure that risk is reduced to the lowest practical level. The risk mitigation strategy in place at RTA follows FTA guidance:

- Avoid: Avoidance removes the undesired consequence, such as canceling or delaying the operation or activity until risk is appropriately mitigated.
- Reduce: Risk reduction is the application of mitigations to reduce probability or severity to an acceptable level. It is noted here that it is rarely possible to reduce severity without engineering or operational configuration changes (such as speed reduction).
- Segregate: Segregation limits the exposure of people, assets, operations or activities to the consequences of the identified hazards.

The hierarchy of mitigation as defined by FTA is:

1. Design out the hazards
2. Install safety devices
3. Use warning systems
4. Administrative (rules, procedures, training)
5. Personal Protective Equipment (PPE)

Criteria that RTA may use to identify when mitigations or strategies may be necessary to reduce the likelihood or severity of consequences are:

1. Identification of risk level acceptability
2. Cost-benefit analysis
3. Availability of technology
4. Changes to procedures, rules or training
5. Service changes

Each level of employee has specific responsibilities in response to hazards.

Front-line employees (and contractors) are trained to recognize hazards, report them and what activities are required of them for mitigation, such as corrective maintenance, avoidance of collisions, stop hazardous work, use of PPE, rules compliance, use of Incident Command, setting up barriers, etc.

Technical managers must respond to and investigate hazards, deploy resources at their disposal to address and mitigate hazards under their control; and when additional resources or assistance are needed, inform executive management and/or the Safety

Department in a timely manner.

Executive management must allocate resources based on risk (as determined by or in consultation with the Safety Department), and if resources are not available, ensure that no activities take place until the level of safety risk is mitigated to an acceptable level (as determined by the Safety Risk Acceptance Criteria table).

If risk needs to be mitigated beyond existing mitigations, or when new hazards are identified that require corrective action, a mitigation must be developed, implemented, and monitored. The CSO will advise whether a CAP is required to facilitate the necessary actions to mitigate the safety risk to an acceptable level. The CSO will monitor mitigations and corresponding CAPs to ensure consistency and compliance with the ASP. CAPs are submitted electronically to the SSO by the CSO for approval once the CAP is opened. Not all mitigations require a formal CAP be submitted to the SSO.

Safety risk mitigations and CAPs are selected for Executive-level review during ESSC meetings, at the discretion of the CSO and COO.

Risk still inherently exists even after mitigation; the department is responsible for monitoring the mitigation, in coordination with the CSO or designee, and promptly reporting to the CSO if the mitigation is ineffective or introduces unintended hazards. The CSO will advise the department whether a Mitigation Monitoring Plan (MMP) is required, and if so, what level of documentation is sufficient and what should be entailed in the monitoring. (Also see Section III – Safety Assurance.)

2.4 Tracking

Each department is responsible to document its SRM activities and report them to the CSO or to the ESSC, as appropriate. Using these reports from corresponding departments as well as the official Safety Department Hazard Log and other documentation, the CSO tracks mitigations/CAPs to ensure that no unacceptable risk is assumed due to error or omission and ensures that any associated CAPs are developed and reported to the SSO as required.

The official Hazard Log contains all hazards whose assessed SRI meet either the unacceptable (high) or undesirable (medium) thresholds as well as hazards rated lower but requiring follow-up and cross-departmental coordination.

For convenience, the Hazard Log is divided into two main sections containing: those hazards rated either high or medium based on the safety risk acceptance criteria (reportable to the SSO); and hazards rated either low or acceptable. The Log is reviewed by the ESSC during monthly meetings and is also discussed during regular coordination meetings between the CSO and SSO.

The following fields of information are provided in the Hazard Log:

- ID number
- Hazard description– refers to a brief narrative summary of the hazard – what it is; where it is located; what elements it is comprised of element of RTA's operation affected by the hazard
- Date identified
- Hazard source– indicates the mechanism used to identify the hazard, e.g., operator report, near-miss, accident investigation, internal safety management audit, rules compliance program, facility/equipment inspection, formal hazard analysis
- Safety Risk Index (SRI)- whether assessed by the department with support from the CSO or by the Safety Department directly
- (Recommended) Hazard Resolution/Mitigation/CAP– refers to the actions recommended by RTA to address the hazard and bring it into a level of risk acceptable to management
- Status– refers to the status of the recommendations. Status may be designed as pending, open, in progress, or closed.

Section III: Safety Assurance

Safety Performance Monitoring and Measurement

RTA has established activities to:

- Monitor the RTA system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
- Monitor RTA operations to identify hazards not identified through the SRM process (per 49 CFR Part 673.25);
- Monitor RTA operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- Investigate safety events to identify causal factors; and
- Monitor information reported through any internal safety reporting programs.

Safety Assurance (SA) is a continuous process, constantly interacting with SRM. It is a set of systematic, ongoing processes that are both led and facilitated by the Safety Department to monitor system safety performance. This monitoring is used to: verify that safety objectives are being met; identify previously unforeseen hazards; ensure that mitigations in place are effective and not creating new hazards; and collect data on safety that can be analyzed, trended and shared in support of continuous improvement of the SMS. In addition, SA activities assist the agency in identifying and correcting practical drift and in establishing appropriate safety performance measures and SPTs.

The CSO is responsible for ensuring SA processes are compliant with 49 CFR Part 673 and are effective.

3.1 Safety Data Analysis

RTA departments and functional areas are each responsible to identify, collect and analyze data on their safety critical functions in close coordination with, and at the direction of, the CSO or designee.

Sources of data at RTA include, but are not limited to:

- Employee reporting systems, including self-reporting
- Field reports and observations from supervision and managers
- Preventive maintenance and other scheduled inspections
- Results from drills and exercises, and critical incident debriefings from actual emergency events
- Internal safety management audits and SMS implementation documentation
- Quality assurance and quality control inspections, audits and other activities

- Employee, passenger and public reports of injury
- Planning and scheduling data collection
- Key performance indicators
- Accident and incident Investigation reports
- NTD data collection and reporting
- Drug and alcohol compliance programs
- Rules and procedures compliance activities
- Safety committee activities and reports

Each department submits its data as related to safety performance and mitigation monitoring, to both the CSO and the executive in its area for review and verification. Executives are expected to discuss data and safety performance at ESSC meetings at the Chair or Co-Chair's direction or otherwise as appropriate. Safety performance data are also reviewed by the RTA Board of Commissioners at their request.

3.2 Rules and Procedure Compliance Activities

A robust SMS requires ongoing SA activities; that is, continuous performance monitoring, conducted in the field with real-time assessment and data analysis, so as to provide management with the best and most reliable information for assessing performance.

General orders, bulletins, memos and notices are issued as interim measures until permanent changes are made in the Operations Rulebook. To ensure the appropriate level of executive management oversight, Special Orders, Permanent Orders, Temporary Orders and Change Orders that modify or are intended to permanently establish rules and procedures must be approved and signed by the CSO.

The ESSC may provide an executive management review of the Rulebook revision process at the discretion of the CSO. Operations technical management and Executive-level management are responsible for monitoring compliance with rules and procedures.

Note: At this time, the process by which all rules compliance activities are coordinated between Operations and Safety is still in development. It is anticipated that within three years, the SA process—including a robust rules and procedures compliance subcomponent—will be fully mature. (Also see APPENDIX E: SMS IMPLEMENTATION PLAN.)

3.3 Internal Safety Reviews

RTA has three types of ongoing, internal safety reviews to monitor compliance with its SMS as described in this ASP. These reviews are required under 49 CFR Part 673.27(b). They are:

1. Triennial Internal Safety Management Audit Program (ISMAs)

   This program, also required under 49 CFR Part 674.27(a)(4), is owned by the Accountable Executive and implemented by the CSO. Each department and functional area is reviewed for compliance with this ASP and all of the department or area's internal requirements once every three years. Deficiencies require CAPs to be developed and implemented by the department or functional area. All ISMA reports are submitted annually to the SSO under the CEO's signature as required by the SSO and 49 CFR Part 674.

   SOP 004-100 dictates that prior notice is given to the SSO and all ISMA activities adhere to SSO requirements. Final audits are shared with the ESSC and may be discussed at subsequent ESSC meetings at the discretion of the Chair and Co-Chair, depending on severity of findings, emerging trends, or other factors. The CSO is tasked with overseeing the process and is certified to serve as Lead Auditor.

   At present, the three-year calendar for upcoming ISMA topics is as follows (subject to change and provided here for reference only):

2021	**Vehicle Maintenance (Bus, Streetcar, Automotive)**
	Safety (conducted by Internal Audit and Compliance)
	Physical Security
	Operations (Bus, Streetcar)
2022	Public Information and External Affairs
	Capital Projects
	Marine Operations
	Drug & Alcohol
2023	Facilities Maintenance
	Power & Way Maintenance (MOW, Traction Power, Signals)
	Planning and Scheduling
	CFO Administrative Functions (Procurement, Accounting, DBE)
	Operations (Mobility and Alternative Modes)

   The audit of the CSO's SMS compliance is performed by the Director of Internal Audit and Compliance, who reports to the Chief Financial Officer, to avoid conflict of interest.

2. Safety Department-led Safety Assurance (SA)

   Key SMS personnel, at the direction of the CSO, conduct periodic, unannounced

SA inspections or field observations to ensure compliance with safety-critical rules and procedures.

The CSO oversees the process to ensure integrity and compliance, and has the discretion to require more regular reporting if necessary in a given area. Staff document their observations and any non-compliances using the appropriate SA form. The Safety Department has developed forms specific to certain, higher risk activities, e.g., special streetcar operations, flagging/Maintenance-of-Way, and special track work. Findings, trends, and concerns will be presented to DSCs and the ESSC, in consultation with Operations and Maintenance staff, until resolution. If necessary, the Key SMS personnel are authorized to cease operations or a work activity if they identify an imminent hazard posing an unacceptable level of safety risk. They have the authority and responsibility to coach any employees whom they observe failing to comply with a procedure or committing an unsafe act. These one-on-one coaching sessions are then documented using a standard form.

3. Monitoring of Safety Performance Measures.

   Monitoring of the system wide Safety Performance Measures identified in Section 1.1.1 requires all departments that collect data directly applicable to the Performance Measures report these measures to the CSO or designee at their request. Generally, progress relative to the SPTs set forth in the ASP will be reviewed in ESSC meetings.

Internal safety reviews are designed to monitor all activities and functions to identify non-compliances with the ASP and correct them, identify hazards, and implement mitigations to reduce safety risk. They are also a means of identifying any existing mitigations that may be ineffective, inappropriate or were not implemented as intended as required.

The CSO or designee will coordinate with and support any department that has a non-compliance or deficiency with developing a CAP and/or mitigation as necessary. Where appropriate, the CSO will follow all CAP-approval procedures per the SSOPS and direct his/her staff to monitor implementation progress. The Safety Department follows the SOP entitled Procedure for Addressing and Closing CAPs to ensure they are handled consistently and in accordance with the SSOPS.

3.4 Safety Assurance: Maintenance and Support Functions

In addition to the above described SA activities that apply for all departments, there are maintenance and related support functions under the purview of the COO, who is responsible to oversee specific activities for SA that do not occur elsewhere in the agency.

These functions of maintenance control are fully documented in Maintenance Control Plans, processes and procedures for the following areas:

1. Preventive, predictive and corrective maintenance
2. Facilities maintenance management
3. Support activities, including contracted activities (component repair, equipment repair, overhaul, metrology, transportation, mainline recovery, fabrication)
4. Hazard management, quality assurance and quality control
5. Lifecycle Planning, including reliability and maintainability
6. Supply chain, procurement and materials management and warehousing
7. Engineering, including contracted services
8. Transit Asset Management support and interface.

Refer to the Maintenance Control Plans, and related procedures, for each maintenance department.

3.5 Investigations

49 CFR Part 673.27(b)(3) requires the transit agency to establish activities to conduct investigations of safety events to identify causal factors. FTA's SMS approach requires investigations to apply the "Organizational Approach;" that is, all investigations will seek to identify causal and contributing factors instead of simply blaming the person closest to the event.

Internal investigations of all FTA-defined safety events are initiated by the department or functional area that experienced the event in accordance with the RTA Investigation SOP #004-005. That department or functional area will continue to carry out the investigation unless otherwise directed by the Safety Department or an external investigator (e.g., FTA, SSO, NTSB).

Major event investigations (those required to be reported to the SSO and FTA, or alternatively, any selected by the Chair or Co-Chair for discussion) are discussed at the monthly ESSC meetings. Corrective actions stemming from any findings contained in the final investigation report must be developed by the departments and functional areas, in consultation with the Safety Department, and be approved by the SSO prior to implementation. Upon receipt of formal approval, actions are coordinated and managed by the CSO and fully implemented in the approved time frame by the responsible party(ies). Responsible parties may or may not reside in the department or functional area that initially reported the safety event.

Generally, RTA will take appropriate measures (mitigations) to reduce the level of safety risk (likelihood and/or severity) associated with identified contributing factors in order to prevent reoccurrence. One or more CAPs may comprise a single safety risk mitigation.

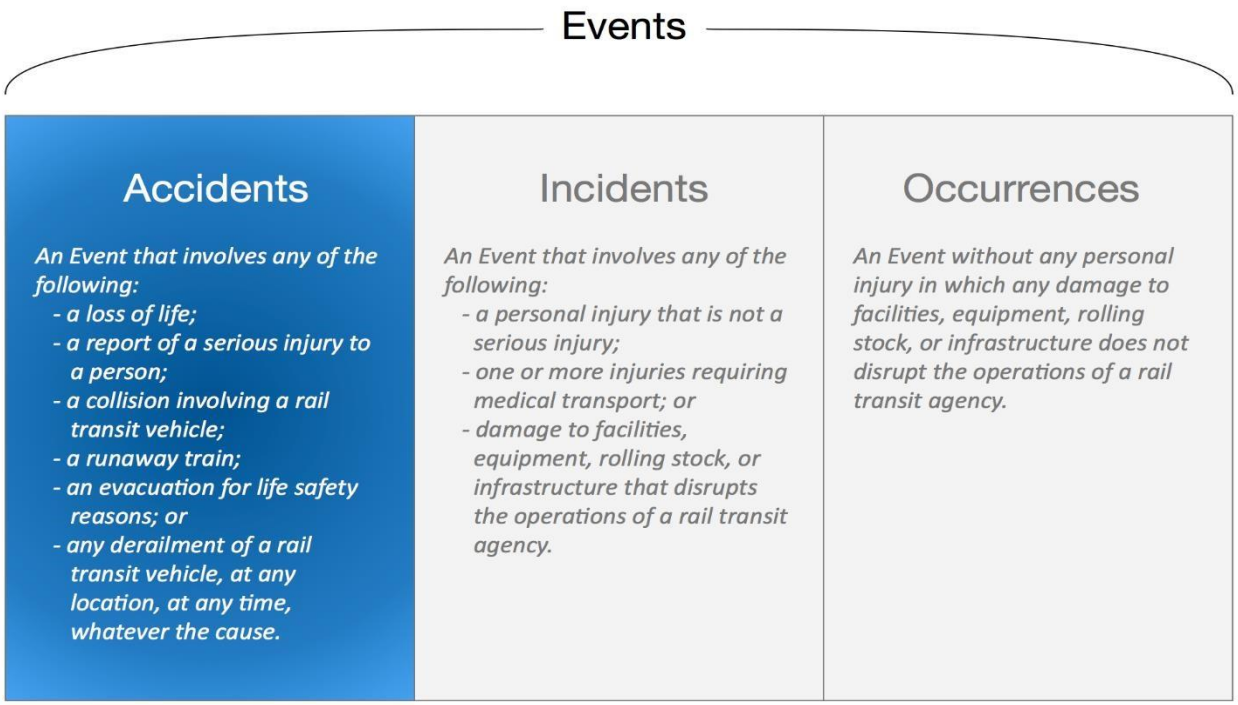
CAPs may also be unrelated to the mitigation(s) as they may be aimed at addressing

system deficiencies or non-compliances that were identified during the investigation but did not contribute to the event.

The CAP management process will be carried out at the direction of the CSO, in accordance with SSOPS requirements. [Also see 3.7.1 Corrective Action Plans (CAPs).]

3.5.1 Event Reporting

RTA is required to report events as defined by FTA and the SSO. Part 674 defines three types of safety events: accidents, incidents, and occurrences, and requires a rail transit agency (RTA) to notify its SSO and the FTA within two hours of any event classified as an accident. FTA defines the following three categories of events:



Reporting to the SSO is defined in the SSOPS, and FTA is notified through the US DOT Crisis Management Center (CMC) by email at toc-01@dot.gov (preferred) or (202) 366-1863. The OCC is the primary responsible party for issuing the notification, in consultation with the on-call Safety representative, as necessary.

A full investigation is conducted for each reportable safety event, in accordance with SOP # 004-005 and applicable SSO requirements.

RTA attends monthly meetings to discuss accidents, including reporting and the status of investigations of SSO-reportable events, with the SSO. Additional follow-up meetings

may be scheduled in coordination with the SSO, as necessary.

3.6 Management of Change

Management of change is a process for identifying and assessing changes that may introduce new hazards or have an adverse impact on the agency's safety performance. RTA is committed to identifying changes that need to be evaluated further to determine whether an adverse impact can reasonably be expected. When a change is identified (see Section II – SRM) it needs to be evaluated through SRM, as if it were a newly reported hazard.

Changes can introduce new hazards or have an impact on the appropriateness or effectiveness of existing mitigations.

Each department and functional area must identify all changes, perform an initial evaluation, and then elevate and forward the concern to the CSO as appropriate, given the level of safety risk determined. If the level of safety risk is undetermined, or if additional technical capacity is required before reaching such a conclusion, the CSO or designee may lead the analysis. The CSO may direct the ESSC to assist with the assessment at their sole discretion. In coordination with the department or functional area that is responsible for the change as well as the ESSC, the CSO either implements or advises the department to implement mitigations so that the level of safety risk is managed to an acceptable level during and after the change. No operations may take place in the changed environment until the change is evaluated to determine the impact on safety. As SMS Executive, the CSO may elevate the analysis and any resulting actions/mitigations to the Accountable Executive if necessary.

SA activities that may identify a need to manage change, include:

- Monitoring of service delivery activities (including field observations)
- Monitoring operations and maintenance data
- Analysis of employee safety reporting program
- Evaluations of the SMS
- Safety audits, studies, reviews, and inspections
- Safety surveys
- Investigations.

Generally, at a minimum, changes need to be assessed through SRM if they substantially change the system (e.g., streetcar line extensions) or constitute a major safety-critical re-design (excluding functionally and technologically similar (“in-kind”) replacements.

The following areas are specialized sources of risk associated with change.

3.6.1 Safety and Security Certification

Safety and Security Certification (SSC) is an FTA-defined process of verifying that certifiable elements and items comply with a formal list of safety and security requirements developed for major construction, rehabilitation or vehicle procurement projects. Certifiable elements are those project elements that, as determined through hazard analyses, can adversely affect the safety and security of customers, employees, emergency responders, or the public.

SSC is accomplished through a collaborative effort between the CSO and the applicable Project Team, which may include representatives from other RTA departments as well as project contractors.

The process is guided by RTA's Safety and Security Certification Program Plan (SSCPP) which is maintained by the Deputy CEO – Planning & Infrastructure.

The Safety and Security Certification Review Committee (SSCRC) reports to and receives direction from the ESSC, and provides guidance for RTA's SSC program. The makeup of the committee varies with the nature of the project(s) as described in the SSCPP.

3.6.2 System Modification

Physical changes to the system that are not governed by the SSC process often fall under the Engineering Modification Process. This includes evaluation and assurance that a proposed modification does not create unacceptable or undesirable risk in a system, vehicle, equipment or facility previously certified under the SSC process.

System modifications will be discussed in ESSC and departmental safety committee meetings, as needed. Additionally, internal safety reviews and external audits of the Infrastructure and Maintenance Departments will include a careful review of this process, to ensure it is performing as intended.

3.6.3 Procurement

When the agency must make new procurements; changes to existing materials, vendors and contracts; or changes to the procurement process itself, RTA Executive-level management must apply the SRM process of this ASP to the extent practicable.

The process established for procurement follows the same steps as other changes:

1. The department or area must assess whether the change (procurement) will carry risk or introduce hazards.
2. If a consequence of the change being introduced is an increased level of safety risk, the department or area must notify the Safety Department. This is typically done through the Change Order process.

3. The Safety Department will lead or support a formal risk assessment following the principles and procedures delineated in Section II – SRM. The Department may use SMEs where appropriate.
4. If appropriate, mitigations must be in place before the change is made. This process will be led by the Safety Department, in consultation with the Procurement Department and the department/area securing the material, vendor, or contractor.

3.7 Continuous Improvement

Continuous Improvement is the process by which RTA examines its safety performance to identify safety deficiencies and carries out a plan to address the identified safety deficiencies. It consists of formal activities designed to evaluate the effectiveness of the SMS. Specifically, it will:

1. Identify the causes of sub-standard performance of the SMS
2. Determine the implications of sub-standard performance of the SMS in operations
3. Eliminate or mitigate such causes.

Its key elements are proper management of all activities through the SRM process; proper change management; compliance activities, including those contained herein in Section III - SA; and performance auditing.

The annual ASP revision cycle, managed by the CSO in close coordination with ESSC members and executive leadership, provides a framework for identifying and capitalizing on new opportunities to improve and grow the SMS. Thus, performance targets for the system, SMS implementation status, and ongoing discussion relative to safety objectives across all departments are discussed in each ESSC meeting.

Once deficiencies in the SMS are identified, corrective actions must be implemented in accordance with this ASP and applicable SSO requirements. As SMS Executive, the CSO is duly authorized to implement such corrective actions as needed.

3.7.1 Corrective Action Plans (CAPs)

CAPs are required to correct non-compliance with the ASP or referenced internal requirements or deficiencies in the SMS; and otherwise by direction of the SSO or the FTA. Per FTA guidance on ASP implementation, CAPs are <u>not</u> to be confused with mitigations, although in some instances, they may be one in the same. In either case, the CSO is responsible for monitoring and verifying completion and for ensuring the hazard or concern is adequately addressed.

All CAPs must be reviewed and approved by the SSO per 674.27(a)(4). CAPs are submitted by the CSO to the SSO electronically for approval once they are entered on the CAP log.

Usually, this approval is required prior to beginning implementation of the corrective action, but in exigent circumstances involving immediate protection of life and property, the action may be commenced and then reviewed and accepted or modified by the SSO. RTA will attend all scheduled meetings to discuss the CAPs and coordinate activities with the SSO. CAPs may also be coordinated and discussed in ESSC meetings.

The SSOPS indicates the conditions under which RTA is required to develop and carry out a corrective action. All CAPs at RTA will conform to the requirements of the SSOPS.

CAP closure is dependent upon SSO verification of closure and approval.

Section IV: Safety Promotion

A robust SMS is dependent upon ongoing management commitment to addressing safety risk through training and communication.

4.1 Competencies and Training

RTA is currently reviewing its comprehensive safety training curriculum for all positions and functions. Position classifications will be updated accordingly. Training requirements that will be included in this comprehensive program will encompass:

1. Departmental and functional area responsibilities for training
2. Departments/areas/sections providing training, including all on-the-job training and technical training programs for supervisors
3. Specialized internal safety-related training programs (industrial safety, respirators, Blood-borne Pathogens (BBP), RWP, SMS, investigation, etc.)
4. Vendor-provided training programs controlled by RTA
5. Required initial training by department, area and position (including training matrices)
6. Technical training and professional development coursework
7. Required refresher and re-certification training by department, area and position (e.g., RWP)
8. Contractor training requirements
9. Training records creation, access and maintenance
10. Certifications
11. Training Quality Assurance Program
12. Train-the-trainer programs
13. Student feedback and assessments
14. Trainer feedback and assessments

Instruction in safe methods of operations and safety procedures is included in

rulebooks, manuals, handbooks, and other documentation developed for the training and qualification of safety-critical personnel, maintained by the department in consultation with HCWD. Training consists of classroom training, field training, on-the-job training, and testing/evaluation.

The Manager of Operations Training and the Director of Professional Standards and Training are responsible for providing new and revised safety training programs to the CSO for review. Additionally, review of proposed training can be conducted in collaborative ELT and/or ESSC meetings.

Executive-level management and Technical-level management share the responsibility to ensure that all employees know and understand their training duties and responsibilities, and that training requirements are met in their respective areas.

Key SMS personnel designated with direct responsibility for rail fixed guideway safety oversight are required to meet the training requirements codified in 49 CFR Part 672 to include the completion of refresher training every two years. Refresher training consists of two components:

- "SMS Awareness" online course through TSI – one hour; and
- Any external safety- or security-related course which includes a minimum of one hour of safety oversight training. External training courses must be pre-approved by the CSO who will evaluate whether the curriculum meets applicable requirements and also confirm that funding is available.

Each designated Key SMS position is responsible for applying for and maintaining their individual certification with FTA.

At present, one-hour training modules are also being delivered to all new employees during new-hire orientation. Other introductory SMS presentations and workshops have been delivered to: frontline staff, senior leadership team members, and individual departments. The Safety Department develops and adapts its training to cover the following topics as needed:

- SMS responsibilities and accountabilities specific to each department or function
- Employee Safety Reporting Program
- SMS documentation and recordkeeping requirements
- Hazard identification
- CAP management process
- Safety Committee structure
- How to assist the Safety Department with Safety Promotion efforts as outlined in this ASP section.

4.2 Safety Communications

Effective safety communication is one of the foundational philosophies of SMS. Its purposes are to:

1. Ensure that personnel are aware of the SMS
2. Convey safety-critical information
3. Explain why particular safety actions are taken
4. Explain why safety procedures are introduced or changed
5. Provide feedback on employee-reported hazards and safety concerns.

The primary safety communication responsibility of the ELT at RTA, under the requirements of 673.23(c), is to actively and personally communicate the Safety Management Policy to all employees and contractors. Any changes to the Safety Management Policy must be approved and distributed to all employees. This is primarily implemented through the committee process, but every Executive-level and Technical-level manager is also required to share and promote the Safety Management Policy to all other employees in the area(s) they control. All approved policies are shared in the “company policies” folder in the RTA public drive as well as through ADP. Additional tools for disseminating future revisions and for maintaining document control are under review.

Methods of communicating safety information to RTA employees include face-to-face meetings and interactions, posting and/or distribution of bulletins, department notices, and memoranda, and through a monthly Safety Department newsletter. Posted information can be found at a central location in each department easily accessible to employees. Other communication methods include posters, signs, brochures, training materials, rulebooks, and operating procedures.

RTA's comprehensive employee safety promotion program includes the following elements:

- Facility/location safety inspections and audits with written reports and follow-up responses to employees as appropriate;
- Periodic employee awareness training;
- Monthly safety committee meetings;
- Quarterly safety meetings (mandatory for Operations and Maintenance employees);
- Special request employee safety training programs;
- Safety posters, and posting of reports, information, statistics, data, notices, bulletins, awareness campaigns, flyers, health services, employee assistance programs and other safety information in employee work areas;
- Annual worker right-to-know programs and industrial safety training; and
- Periodic insurance carrier/broker assessments.

4.2.1 Safety Committees

The Executive Safety Committee at RTA is the ESSC, the primary group responsible to provide guidance and direction to the agency and to the Accountable Executive on

acceptable and unacceptable risk, resource allocation, the status of SMS implementation for each of their areas of control and the promulgation of safety policy and SMS agency-wide.

The standing (voting) membership of the ESSC consists of all ELT positions (all of which report to the Accountable Executive), and other key Director and Senior Director positions in Operations, Safety, and Security Departments. The SSO Program Manager is invited to each formal meeting as a non-voting member.

The Chairperson is the CSO. Members may invite departmental and area personnel, key personnel, and SMEs, to attend on an as-needed basis, but these invitees do not have voting powers.

The ESSC has established subcommittees, including the SSCRC and Right-of-Way Safety Subcommittee. The ESSC operates by a formally documented Charter, contained in the Board-approved policy, SAF5.

The ESSC provides information on hazard resolution and SRM, safety performance, and resource issues to all levels of the agency. This is implemented through the ESSC's reporting to the lower-level Departmental Safety Committees (DSCs).

DSCs are front-line and mid-level safety committees established to address department-specific safety issues and communicate safety concerns and hazard resolution status. The DSCs establish and foster a close working relationship with employees, unions, and management regarding safety issues. Per SAF5:

- The Chairperson of each DSC must be a current designated member of the ESSC;
- The DSC must have regularly-scheduled meetings at least quarterly
- The DSC is requested to invite Safety to send a representative who will serve as SME for safety risk assessment and hazard analysis, and be responsible for elevating hazards or safety concerns when necessary; and
- The DSC must document their meetings with formal agendas and minutes and provide such documents promptly to the Safety Department for filing.

4.2.2 Hazardous Materials

All maintenance and support personnel who are required to use chemicals and hazardous or toxic substances are trained in the safe use of such substances. Employees who move to new positions are provided training in the use of any new chemicals that they may be assigned to use by the supervisor.

RTA is responsible for developing procedures that ensure compliance with the hazardous materials standards by all RTA employees and implementing the SA process for hazardous materials.

The chemical, hazardous material and GHS Safety Data Sheet (SDS) review process is incorporated into Maintenance Department procedures and training. All chemicals and hazardous materials used by RTA employees or in the RTA operating system shall be evaluated and approved by the CSO or his/her designee prior to use or testing of the product in accordance with the SOP.

The end user must ensure that the CSO has reviewed and provided written approval of the requested chemicals prior to procurement, including procurement utilizing blanket orders, petty cash, purchase cards, construction specifications or equipment specifications. Procurement does not process requests for chemical products without the written approval from the CSO and an approved SDS number on file for that product. Procurement shall implement the required quality control procedures to ensure that only chemical and hazardous materials, previously reviewed and approved by the CSO and assigned a unique SDS number, are accepted by the receiving storerooms. Substitutes for chemical products and hazardous materials shall have prior CSO review and approval.

All users of any approved product must read the Evaluation/SDS Approval prior to using the product and follow all instructions and precautions. The CSO or his/her staff may conduct site visits where chemicals are being used to ensure that workers are aware of the hazards and that they are using the proper PPE.

4.2.3 Drug and Alcohol Compliance

RTA has developed a Drug & Alcohol Free Workplace Policy (SAF1) to ensure a safe environment for the public and RTA employees.

The Designated Employee Representative (DER) has primary responsibility for administering a Drug & Alcohol Testing Program in accordance with 49 CFR Part 40, Procedures for Transportation Workplace Drug and Alcohol Testing Programs and 49 CFR Part 655: Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations. SAF1 establishes procedures for the Drug and Alcohol Testing Program, which is administered by the DER, in close coordination with Operations and HCWD. The appendix section of SAF1 includes both a list of DOT safety-sensitive positions under the current organizational structure, as well as a list of non-DOT (“RTA”) safety-sensitive position for which testing is conducted under RTA’s authority.

APPENDICES FOLLOW

APPENDIX A: 2022 SAFETY PERFORMANCE TARGETS

The updated 2021 Safety Performance Targets (SPTs) are as follows. Total amounts are targeted by calendar year.

Streetcar

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	37	4.01	18	1.95	20,000

* As defined in the NTD Safety & Security Policy Manual, dated January 2020[2]
^ Includes major and non-major reportable events but excludes injuries related to assaults or other crimes (security events)
+ Includes major safety events only
Determinations of accident/incident preventability have no bearing on any SPTs per FTA guidance.

In 2020, RTA reported 12 streetcar mode events to NTD that met a major safety event threshold. As of July, 2021, the projected year-end total will be approximately 16-18 major safety events as classified by NTD if current trends continue. Note: RTA operated at reduced service levels for much of 2021 due to the COVID-19 public health emergency.

As comparison, the current benchmark for preventable accidents is 2.3 per 100,000 VRM.

Fixed-Route Bus

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	60	1.13	36	0.68	8,000

* As defined in the NTD Safety & Security Policy Manual, dated January 2020
^ Includes major and non-major reportable events but excludes injuries related to assaults or other crimes (security events)

[2] NTD Safety and Security Policy Manual (https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/ntd/146986/2020-ntd-safety-and-security-policy-manual.pdf)

+ Includes major safety events only
Determinations of accident/incident preventability have no bearing on any SPTs per FTA guidance.

In 2020, RTA reported 27 fixed-route bus mode events to NTD that met a major safety event threshold. As of July, 2021, the projected year-end total will be approximately 32-36 major safety events as classified by NTD if current trends continue. Note: RTA operated at reduced service levels for much of 2021 due to the COVID-19 public health emergency.

As comparison, the current benchmark for preventable accidents is 1.5 per 100,000 VRM.

Non-Fixed-Route Bus (Paratransit)

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	10	1.26	7	0.88	40,000

* As defined in the NTD Safety & Security Policy Manual, dated January 2020
^ Includes major and non-major reportable events but excludes injuries related to assaults or other crimes (security events)
+ Includes major safety events only
Determinations of accident/incident preventability have no bearing on any SPTs per FTA guidance.

In 2020, RTA reported 6 non-fixed-route bus mode events to NTD that met a major safety event threshold. As of July, 2021, the projected year-end total will be approximately 6-7 major safety events as classified by NTD if current trends continue. Note: RTA operated at reduced service levels for much of 2021 due to the COVID-19 public health emergency.

As comparison, the current benchmark for preventable accidents is 1.5 per 100,000 VRM.

General Notes

For the purposes of establishing SPTs, safety events involving non-revenue vehicles are not included as they are not reported to NTD. Safety events involving RTA maintenance employees operating revenue service vehicles *are* included for their respective mode.

RTA's Safety and Security previous reporting for 2020-2021 under NTD's Safety and Security Major and Non-Major criteria was accessed and reviewed in support of

establishing SPTs. Due to differences in the reporting thresholds, the safety events reflected here are not necessarily the same as the events reported to LADOTD in accordance with 49 CFR Part 674.

All VRMs by mode are calculated using the previous year's actual performance data. The below VRMs are used for the above mileage-based targets:

- Streetcar – 923,255 (2020 VRM uncertified data)
- Fixed-Route Bus – 5,311,215 (2020 VRM uncertified data)
- Non-Fixed-Route Bus – 794,364 (2020 VRM uncertified data)

SPTs are formally made available to the agency's Metropolitan Planning Organization (MPO), the Regional Planning Commission (RPC), per the requirements of 49 CFR Part 673.15(a), and to LADOTD annually for review and comment prior to finalizing the ASP. Refer to the Agency Safety Plan Revision SOP #004-002.

Notes on FTA's Definitions Used in this Section
(per PTASP Technical Assistance Center "TAC" website -- https://www.transit.dot.gov/PTASP-TAC):

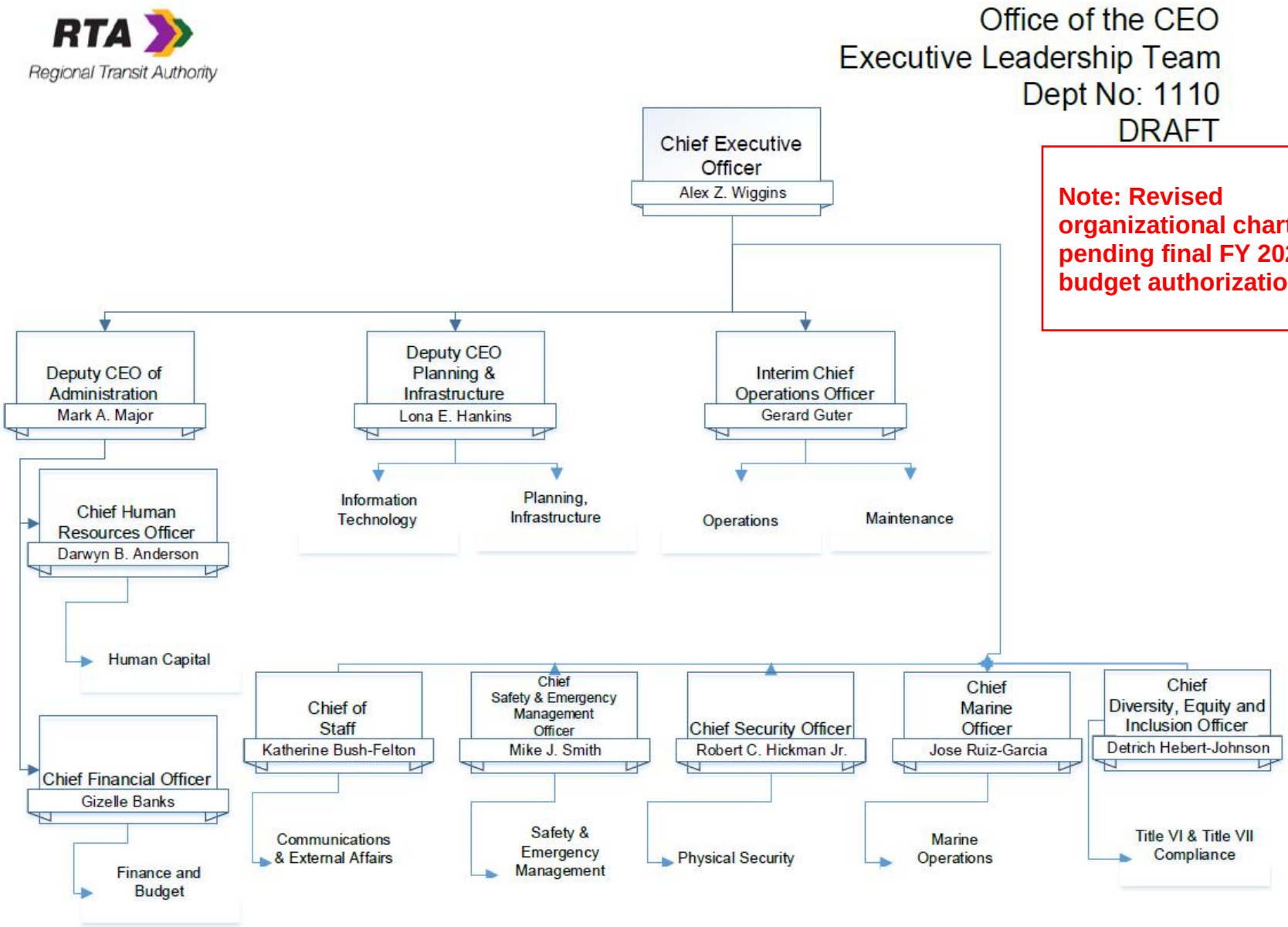
FTA's guidance on SPTs indicates that transit modes fall into one of three categories: rail modes, fixed-route bus modes, and non-fixed route bus modes. RTA's SPTs are established for these modes, accordingly. The safety performance of passenger ferry services is managed and overseen through separate policies and procedures.

For injuries, FTA uses the definition established by the NTD, which is "any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene." For the injury performance measure, FTA uses all injuries reported on both the NTD S&S-40 (major) and S&S-50 (non-major) forms but excludes injuries related to assaults or crimes (security events). This means a transit agency may have to report a crime-related injury to the NTD, but it would exclude that injury from its injury performance measures.[3]

For safety events, FTA uses all safety events that meet an NTD ***major event*** reporting threshold (events reported on the S&S-40 form, however excluding major security events). The NTD defines a safety event as a collision, derailment, 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.

[3] See FTA Safety Performance Targets Fact Sheet (https://www.transit.dot.gov/sites/fta.dot.gov/files/2020-08/SafetyPerformanceTargetFactSheet_20200814.pdf)

APPENDIX B: ORGANIZATIONAL CHART



APPENDIX C: DEFINITIONS/ACRONYMS

Definitions

The following definitions used in this document are consistent with 49 CFR Parts 625, 630, 670, 673, and 674. The source of each is noted in brackets, including the "SMS Glossary of Terms: FTA's Guide to Relevant Terms for SMS Development" of September 2016 shown as "[SMS]".

Accident – an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision involving an RTA vehicle; a runaway RTA vehicle; an evacuation for life safety reasons; or any derailment of an RTA vehicle [673] at any location, at any time, whatever the cause. [SMS]

An *accident* must be reported in accordance with the thresholds for notification and reporting set forth in Appendix A to Part 674. [674]

Accountable Executive – a single, identifiable person who has ultimate responsibility and accountability for the implementation and maintenance of the SMS of RTA; responsibility for carrying out the Safety Plan and Transit Asset Management Plan (TAMP); and control or direction over the human and capital resources needed to develop and maintain both the Safety Plan in accordance with 49 USC 5329 and TAMP.

Administrator -- the Federal Transit Administrator or the Administrator's designee. [670, 674]

Advisory -- a notice from FTA to recipients regarding an existing or potential hazard or risk in public transportation that recommends recipients take a particular action to mitigate the hazard or risk. [670]

Agency Safety Plan (ASP) – a document adopted by a Rail Fixed Guideway System, including RTA, detailing its safety policies, objectives, responsibilities, and procedures.

Audit -- an examination of records and related materials, including, but not limited to, those related to financial accounts. [670]

BTW -- Behind-The-Wheel, a type of required Operator training.

Capital asset -- a unit of rolling stock, a facility, a unit of equipment, or an element of infrastructure used in public transportation. [625]

CEO -- Chief Executive Officer of the Regional Transit Authority.

CFO -- Chief Financial Officer of the Regional Transit Authority.

Chief Safety and Emergency Management Officer (CSO) – an adequately trained individual who has responsibility for safety and reports directly to an RTA chief executive officer, president, or equivalent officer. The CSO does not serve in other operational or maintenance capacities. At RTA the CSO also has primary responsibility for Emergency Management functions. [673]

CM -- Construction Manager of the Regional Transit Authority.

Consequence -- the potential outcome(s) of a hazard. [SMS]

Continuous Improvement -- a process by which a transit agency examines safety performance to identify safety deficiencies and carry out a plan to address the identified safety deficiencies. [SMS]

Contractor -- an entity that performs tasks on behalf of RTA, FTA, a State Safety

Oversight Agency, or other rail transit agency, through contract or other agreement [674], including tasks required for rail compliance.
For example, contractors could handle any portion of a major construction infrastructure project, handle daily switch inspections, or monthly substation maintenance. A contractor is a third party hired by the agency to fulfill a rail compliance need. The rail transit agency may not be a contractor for the oversight agency.
COO –Chief Operating Officer
Corrective Action Plan (CAP) -- a plan developed by RTA (as a recipient and rail transit agency) that describes the actions that RTA will take to minimize, mitigate, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require RTA to develop and carry out a corrective action plan. [670, 674, SMS]
DBE -- Disadvantaged Business Enterprise.
Directive -- a formal written communication from FTA to one or more recipients which orders a recipient to take specific actions to ensure the safety of a public transportation system. [670]
EEO -- Equal Employment Opportunity.
Equivalent Authority – The Board of Commissioners of the New Orleans RTA is 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 the Safety Plan. [673, SMS]
ESSC – Executive Safety and Security Committee
Event – any Accident, Incident, or Occurrence. [673, 674, SMS]
FTA – the Federal Transit Administration (FTA) is an operating administration/agency within the United States Department of Transportation (USDOT). [670, 673, 674]
FMLA -- Family Medical Leave Act
FRA – the Federal Railroad Administration (FRA), an agency of the United States Department of Transportation (USDOT). [674]
Grade Crossing (as defined in the National Transit Database glossary) an intersection of roadways, railroad tracks, or dedicated transit rail tracks that run across mixed traffic situations with motor vehicles, streetcar, light rail, commuter rail, heavy rail or pedestrian traffic; either in mixed traffic or semi-exclusive situations.
Hazard – any real or potential condition that can cause injury, illness, or death; damage to or loss of a facility, equipment, rolling stock, infrastructure, property, system RTA; or damage to the local environment, or reduction of ability to perform prescribed function. [673, 674, SMS]
Hazard Analysis -- the formal activities to analyze potential consequences of hazards during operations related to provision of services. [SMS]
Hazard Identification -- formal activities to analyze potential consequences of hazards during operations related to provision of service. [SMS]
Incident – an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of

RTA. [673, 674, SMS]
An incident must be reported to FTA's National Transit Database in accordance with the thresholds for reporting set forth in Appendix A to Part 674. If a rail transit agency or State Safety Oversight Agency later determines that an Incident meets the definition of *Accident* in this section, that event must be reported to the SSOA in accordance with the thresholds for notification and reporting set forth in Appendix A to Part 674. [674]
RTA has also defined Incident as an unexpected event, including security-related incidents, involving RTA passengers or employees that is not related to an accident. Incidents of significant magnitude must be reported to state and/or federal authorities. See Accident Reporting Threshold for a list of reportable incidents.
Investigation – the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk [673, 674, SMS] or investigation of an event [670].
Lagging Indicators -- provide evidence, through monitoring, that intended safety management outcomes have failed or have not been achieved. [SMS]
Leading Indicators -- provide evidence, through monitoring, that key safety management actions are undertaken as planned. [SMS]
Management of Change -- a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process. [SMS]
Near miss -- a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations. [SMS]
LADOTD -- the "State of Louisiana Department of Transportation and Development" which is the designated State Safety Oversight Agency for rail fixed guideway systems in the State of Louisiana.
National Public Transportation Safety Plan (NSP) – the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53 [673, 674] or authorized at 49 U.S.C. 5329. [670]
NTSB -- the National Transportation Safety Board, an independent Federal agency. [674]
OCC -- Operations Control Center, also known as "Dispatch"
Occurrence – an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of RTA. [673, 674, SMS]
Organizational Accident -- an accident that has multiple causes involving many people operating at different levels of the respective agency. [SMS]
OCS – Overhead Catenary System.
Performance measure -- a parameter that is used to assess performance outcomes. [625]

Performance target – a specific level of performance for a given performance measure over a specified timeframe. [625, 673]
PHA -- Preliminary Hazard Analysis
PPE – Personal Protective Equipment
Practical Drift – the slow and inconspicuous, yet steady, uncoupling between written procedures and actual practices during provision of services. [SMS]
Program Standard (SSOPS) is a written document developed and adopted by LADOTD that describes the policies, objectives, responsibilities, and procedures used to provide safety and security oversight of rail transit agencies.
Public Transportation Agency Safety Plan (PTASP) -- the comprehensive agency safety plan for RTA that is required by 49 U.S.C. 5329 and Part 673 [673], based on a Safety Management System. Until one year after the effective date of FTA's PTASP final rule, a System Safety Program Plan (SSPP) developed pursuant to 49 CFR part 659 may serve as the rail transit agency's safety plan. [674]
Public Transportation Safety Certification Training Program (PTSCTP) -- the certification training program for Federal and State employees or other designated personnel who conduct safety audits and examinations of public transportation systems, and for employees of public transportation agencies directly responsible for safety oversight, established by FTA in accordance with 49 U.S.C. 5329(c)(2), codified in 49 CFR Part 672. [674, 672]
Public Transportation System -- the entirety of RTA's operations, including the services provided through contractors. [625, SMS]
Rail fixed guideway public transportation system -- any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration (FRA), or any such system in engineering or construction. Rail fixed guideway public transportation systems include but are not limited to rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway. [674, SMS]
RFP – Request for Proposals
Risk -- the composite of predicted severity and likelihood of the potential effect of a hazard. [674, SMS]
Risk mitigation – a method or methods to eliminate or reduce the effects of hazards. [673, 674, SMS]
ROW -- right-of-way
RTA -- the New Orleans Regional Transit Authority.
Safety – the state in which the potential of harm to persons or property damage during operations related to provision of services is reduced to and maintained at an acceptable level through continuous hazard identification and safety risk management activities. [SMS]
Safety and Security Certification -- the process applied to project development to ensure that all practical steps have been taken to optimize the operational safety and security of the project during engineering, design, and construction before the start of passenger operation.
Safety Assurance – processes within RTA SMS that functions to ensure the

implementation and effectiveness of safety risk mitigation, and to ensure that RTA meets or exceeds its safety objectives through the collection, analysis, and assessment of information. [673, SMS]
Safety Deficiency – a condition that is a source of hazards and/or allows the perpetuation of hazards in time. [SMS]
Safety Management Policy – RTA's documented commitment to safety, which defines RTA's safety objectives and the accountabilities and responsibilities of its employees in regard to safety. [673, SMS]
Safety Management System (SMS) – the formal, top-down, RTA-wide approach to managing safety risk and assuring the effectiveness of RTA's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks, hazards [673], and management of safety risk [625, 670, SMS].
Safety Management System Executive -- a Safety Officer or equivalent. [SMS]
Safety Promotion – a combination of training and communication of safety information to support SMS as applied to RTA's system. [673, SMS]
Safety Risk – the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome. [673, SMS]
Safety Risk Management (SRM) – a process within RTA's SMS/Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk. [673, 674, SMS]
Safety Risk Mitigation -- the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards. [SMS]

Security is defined as freedom from intentional danger for employees and passengers.
Serious injury – any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or nose); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface. [673, 674]
SIS -- the Service, Inspection, and Storage building for the RTA Canal Street and Riverfront streetcars located at the A. Philip Randolph Facility at 2817 Canal Street.
SMS Executive – a Safety Officer or an equivalent. [673]
SRM – Safety Risk Management (see above).
SSCPP -- Safety and Security Certification Program Plan
SSCRC -- Safety and Security Certification Review Committee
State Safety Oversight Agency (SSOA; SSO) – 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 [670, 673, 674, SMS].
TPA -- Third Party Administrator
Transit asset management (TAM) -- 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 cycle in order to provide safe, cost-effective, and reliable service. [625]
USDOT – United States Department of Transportation.

APPENDIX D: LIST OF SAFETY POLICIES AND STANDARD OPERATING PROCEDURES

This ASP references the following, related Organizational Policies and Standard Operating Procedures.

ID	Title	Revision Date
004-100	Procedure for Performing Internal Safety Management Audits (ISMA)	3/1/21
004-002	Agency Safety Plan Revision	6/15/20
004-005	Accident/Incident Investigation	6/15/20
004-006	Safety Assurance of Safety Critical Areas	10/20/20
SAF1	RTA Drug and Alcohol Free Workplace Policy	2/23/21
SAF2	RTA Distracted Driving Policy	2/23/21
SAF3	RTA Safety Management Policy	2/23/21
SAF4	RTA General Accident and Injury Policy	2/23/21
SAF5	RTA Safety Committee Structure	8/24/21
SAF6	RTA Personal Protective Equipment Policy	8/24/21
	Procedure for Addressing and Closing Corrective Action Plans (CAPs)	TBD
	On-Call Safety Representative Procedures	TBD

New Orleans Regional Transit Authority

Multi-Year Strategic Plan
for
Safety Management System Implementation

2020 – 2025

Updated: October 20, 2021

Policy Statement for Safety Management System Implementation

RTA is committed to improving the quality and effectiveness of its system-wide safety management programs aimed at reducing safety risk and eliminating or controlling hazards. This Safety Management System (SMS) Implementation Plan (or SIP) identifies several interrelated tasks that will help RTA achieve its safety objectives, which are outlined in Safety Management Policy (SAF3). The SMS methods and tools that we will use to carry out these tasks, and detailed descriptions of the key roles throughout the agency for accomplishing this important work, are contained in RTA's Agency Safety Plan (ASP).

The goal of the SIP is to identify, coordinate, and direct activities relative to the implementation of RTA's SMS on a system-wide basis under all applicable FTA requirements. The SIP provides key performance objectives and milestones for the next five years, 2020 through 2025.

Very intentionally, the SIP is designed to be reviewed and updated annually, along with the companion ASP and other SMS documents. In close coordination with the executive leadership team and the Executive Safety & Security Committee (ESSC), the Safety Department will leverage these reviews to ensure we are on the right path toward achieving a mature SMS.

Using the guidance developed in this plan, all RTA departments will share the primary responsibility to establish the required programs and activities in their respective areas. The Safety Department will be happy to provide technical assistance as necessary.

Together, we will build, implement, and sustain a fully functioning SMS that will drive positive safety improvements and help position us to become a world-class transit system.

Michael J. Smith
Chief Safety and Emergency Management Officer, SMS Executive

Summary of Gaps and Action Items (From July 15, 2020 version of SIP; Updated Plan Follows)

The identified gaps that must be addressed in order for RTA to achieve full implementation are below, listed by topic (in no particular order). Each gap is numbered and is followed by one or more associated action items.

SMS Documentation

1. Not all required documentation is developed.

    i. Perform a document audit to establish all current documented procedures and identify gaps.

    ii. Ensure that all departments have procedures and the necessary resources to support: hazard identification, risk assessment, tracking corrective actions to closure, and monitoring of mitigations (SA), including the use of appropriate tracking logs/risk registers.

2. Documents referenced in the ASP are not reviewed regularly.

    i. Review and revise all documentation annually, including the emergency preparedness plan, rulebooks, SOPs, safety policy statement, safety performance targets, SIP, and all other documentation supporting the ASP/SMS.

    ii. RTA Policy Manual is currently in development.

3. Customer safety concerns are not always fully documented and analyzed.

    i. Ensure that all customer concerns are captured from: public meetings; customer calls and electronic communications; and face-to-face interactions with RTA employees.

    ii. Safety Department ensures this information is captured in logs/registers and elevates to ESSC or Executive-level management, as appropriate.

Safety Committee Structure

4. Executive-level ESSC not fully functional.

    i. Re-establish the ESSC under a revised SOP/Charter to focus on SMS objectives, priority accidents/hazards, and other business based on safety criticality.

    ii. Establish a new hierarchy and reporting structure between the ESSC and Departmental Safety Committees (DSCs).

iii. Ensure that all departments appropriately elevate identified hazards and safety concerns to the ESSC's attention, in consultation with the Safety Department.

5. No ownership of Safety Management Policy Statement within ESSC.

    i. Educate the ESSC on the current Safety Management Policy Statement and their roles and responsibilities related to key safety objectives.

    ii. Incorporate safety objectives into meeting agenda.

6. No current committees represent middle management or front-line personnel in each department.

    i. Well-managed DSCs will ensure two-way communication related to hazards, safety concerns, and safety programs, and will encourage participation in SRM and SA processes.

    ii. Invite ATU Local 1560 to DSCs as appropriate.

    iii. Provide baseline SMS training to DSCs.

    iv. Task the Safety Department with providing technical assistance to DSCs as necessary to ensure effectiveness.

Safety Assurance Activities

7. Safety assurance (SA) activities are not robust, and results from activities are not disseminated to all departments.

    i. Establish process whereby Safety Department leads SA activities and concerns are elevated to the ESSC as necessary.

        1. Include recommendations for enhancement of SA processes (continuous improvement).

    ii. Distribute SA findings through the Safety Committees and other means.

    iii. Ensure that all corrective actions for ineffective mitigations identified through the SA process are fully documented.

8. A compliant Management of Change process is in development.

i. Establish Management of Change process including roles and responsibilities for all departments and elevation to the ESSC as necessary.

ii. Finalize and document in the process, all major changes that must be assessed through SRM:

1. major addition, deletion or reconfiguration of RTA's operations, operating methodology, or operating territory, including the addition of rail service or stations

2. major facility changes, additions or rehabilitation

3. purchase of new equipment or rolling stock or major overhaul of existing equipment or rolling stock

4. reorganization of personnel which results in changes in authority or responsibility in any safety-critical area

iii. Prepare a document map to ensure that all changes in the organization are reflected in all critical documentation.

9. Accident and incident investigations have not been sufficient in identifying contributing factors and mitigations, as required in Parts 673 and 674.

i. Develop and implement training on the new procedure as appropriate.

Employee Safety Reporting Program

10. RTA has not fully implemented the required employee safety reporting program. It is in development.

i. Implement the program as described in the ASP. Provide regular updates to the Executive-level management and the ESSC.

ii. Revise and finalize an official hazard-/unsafe behavior-reporting form.

iii. Re-establish a safety hotline (pending staffing plan and transition to in-house O&M responsibilities). Set up email "hotline" option in the interim.

iv. Establish Safety Department protocols for managing the safety hotline.

v. When ready to launch, initiate robust training on the employee safety reporting program.

    1. Specifically address how to handle unacceptable hazards (per SRM section of the ASP)—must be reported to CSO immediately and executive leadership may suspend service or halt work in the area.

vi. Develop a centralized system where all hazards and safety concerns can be placed for Safety Department analysis and to aid communication efforts.

Communication of Safety Information

11. Hazard, assessment, and mitigation information is not shared system-wide

    i. Ensure that all hazard identification, assessment, and mitigation activities are led by the Safety Department, and are properly documented, tracked and shared through Safety Committees, newsletters, bulletins, and other means.

Training

12. The management of RTA's training programs is not centralized.

    i. Centralize management of training; use a matrix for monitoring compliance with program requirements.

13. RTA lacks a system-wide training policy for all employees and contractors.

    i. The training policy needs to include safety-related training for all employees and contractors. The Safety Department will monitor each department's compliance with stated training requirements.

    ii. The training policy needs to include specific requirements and monitoring activities for contractor safety training.

14. Need to establish and follow a new Training Plan for "designated personnel" in order to comply with 49 CFR Part 672.

    i. Develop Training Plan (to be maintained by the CSO and provided to SSO/FTA by request).

    ii. Develop and provide biennial refresher training after completion of initial requirements per 49 CFR Part 672, which must require one hour of safety oversight training.

i. Establish 3-year plan for engaging external training providers, including TSI, NSC, and others.

Miscellaneous

15. RTA does not hold annual exercises for emergency preparedness.

    i. Ensure that exercises (e.g., full-scale, tabletop) are held annually, both internally and with external agencies.

16. RTA needs a revised Drug & Alcohol Program

    i. Drug & Alcohol Program is in development and will be aligned with organizational structure changes, effective October 1, 2020.

17. Passenger ferry operations are not fully integrated into RTA's safety programs.

    i. Integrate ferry operations into RTA's SMS.

    ii. Participate in ferry operator-led safety meetings; hold joint meetings.

Implementation Plan (Updated)

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
SMS Documentation	Perform a document audit to establish all current documented procedures and identify gaps.	Office of Internal Audit & Compliance is developing an SOP catalogue. HCWD has shared all Board-approved company policies and requires employees to sign, acknowledging receipt. Two sets of company policies have been approved, to date, Feb. and July 2021.	Ensure that all departments have procedures and the necessary resources to support: hazard identification, risk assessment, tracking corrective actions to closure, and monitoring of mitigations (SA), including the use of appropriate tracking logs/risk registers.	A Safety on-call technical consultant will commence work in late 2021 to support a gap analysis of department documentation.
	RTA Policy Manual is currently in development.	Operations and Safety have initiated an employee manual work group (i.e., rule book).	Review and revise all documentation annually, including the emergency preparedness plan, rulebooks, SOPs, safety policy statement, safety performance targets, SIP, and all other documentation supporting the ASP/SMS.	Emergency preparedness plan is under development. All rules, SOPs, and other documents will be reviewed annually.
			Ensure that all customer concerns are captured from: public meetings; customer calls and electronic communications; and	New Hazard Report form has been implemented. Vorex helpdesk application will further enhance “safety hotline” capabilities and cross-

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
			face-to-face interactions with RTA employees.	department coordination.
			Safety Department ensures this information is captured in logs/registers and elevates to ESSC or Executive-level management, as appropriate.	Hazard Log was revamped and is being maintained. Separate tabs for critical hazards that are rated the two highest levels on the Safety Risk matrix in the ASP vs. lower-risk hazards that can be handled without ESSC/ELT intervention.
Safety Committee Structure	Re-establish the ESSC under a revised SOP/Charter to focus on SMS objectives, priority accidents/hazards, and other business based on safety criticality.	Complete	Ensure that all departments appropriately elevate identified hazards and safety concerns to the ESSC's attention, in consultation with the Safety Department.	ESSC members were briefed on roles and expectations, including the responsibility to elevate hazards and safety concerns. SMS 101 training is also being rolled out to all employees.
	Establish a new hierarchy and reporting structure between the ESSC and Departmental Safety Committees (DSCs).	Complete; additional DSCs in development.	Well-managed DSCs will ensure two-way communication related to hazards, safety concerns, and safety programs, and will encourage participation in SRM and SA processes.	Will continue to push through DSCs 1-on-1.
	Educate the ESSC on the current Safety	Complete	Task the Safety Department with	Complete; DSC guidelines distributed; Safety

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Management Policy Statement and their roles and responsibilities related to key safety objectives.		providing technical assistance to DSCs as necessary to ensure effectiveness.	attends DSC meetings regularly.
	Incorporate safety objectives into meeting agenda.	Added a standing, annual meeting topic to review safety objectives in support of reviewing and updating the ASP each year.		
	Invite ATU Local 1560 to DSCs as appropriate.	Safety will set up Operations DSC and formally invite ATU 1560 leadership.		
	Provide baseline SMS training to DSCs.	CBT version of SMS 101 course currently in development. DSC leadership will be among first groups targeted to receive the training.		
Safety Assurance Activities	Establish Management of Change process including roles and responsibilities for all departments and elevation to the ESSC as necessary.	Management of Change is addressed in ASP. Specific organizational policy in early stages of development. On-call technical consultant will be tasked.	Establish process whereby Safety Department leads SA activities and concerns are elevated to the ESSC as necessary.	SA SOP for Safety has been finalized and is being implemented. Safety is also conducting remote operator evaluations.

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Finalize and document in the M of C process, all major changes that must be assessed through SRM:…	New Management of Change organizational policy will include exact types of major changes. On-call technical consultant will assist with internal guidance for SSC & Management of Change.	Distribute SA findings through the Safety Committees and other means.	SA findings will be incorporated into ESSC.
	Prepare a document map to ensure that all changes in the organization are reflected in all critical documentation.	Not started.	Ensure that all corrective actions for ineffective mitigations identified through the SA process are fully documented.	SA for Safety-Critical Areas SOP directs staff to initiate a CAP if necessary. Will review during ISMAs to verify whether SA activities are leading to corrective actions and if so, that they are documented.
	Develop and implement training on the new A/I Investigation procedure as appropriate.	Draft A/I SOP is currently under review.		
Employee Safety Reporting Program	Implement the program as described in the ASP. Provide regular updates to the Executive-level management and the ESSC.	ESRP processes are active. Established annual ESSC meeting calendar that includes a recurring meeting dedicated to ESRP status report.		
	Revise and finalize an official hazard-/unsafe behavior-reporting form.	Complete		

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Re-establish a safety hotline (pending staffing plan and transition to in-house O&M responsibilities). Set up email “hotline” option in the interim.	Complete		
	Establish Safety Department protocols for managing the safety hotline.	Team will incorporate Vorex Helpdesk processes into new SOP.		
	When ready to launch, initiate robust training on the employee safety reporting program.	Complete; SMS 101 training includes ESRP. All new-hires receive SMS 101.		
	Develop a centralized system where all hazards and safety concerns can be placed for Safety Department analysis and to aid communication efforts.	Vorex Helpdesk application under development.		

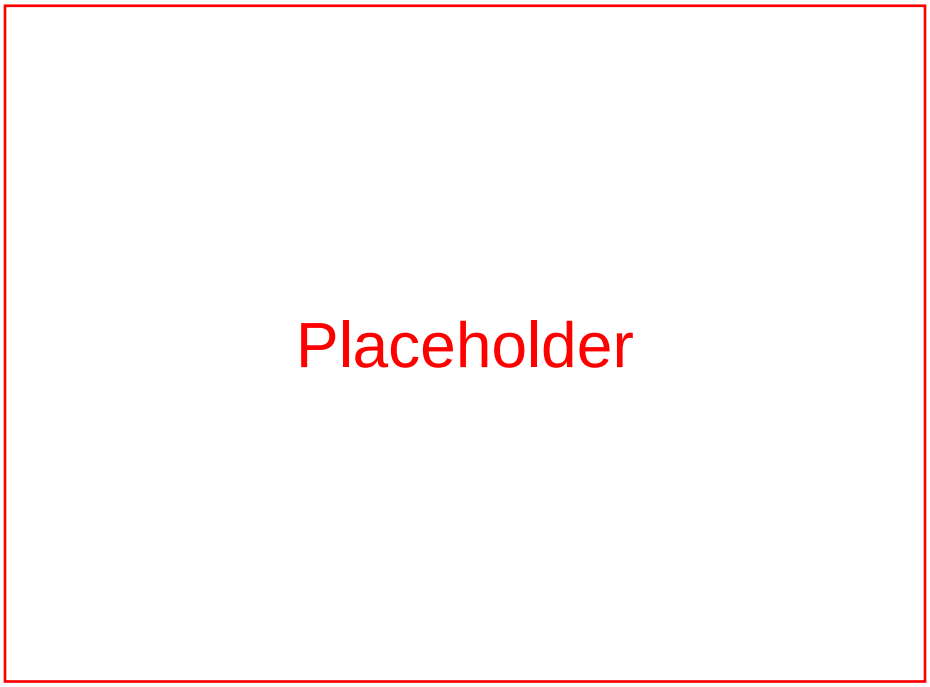
Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
Communication of Safety Information	Ensure that all hazard identification, assessment, and mitigation activities are led by the Safety Department and are properly documented, tracked and shared, through Safety Committees, newsletters, bulletins, and other means.	Complete		
Training	Centralize management of training; use a matrix for monitoring compliance with program requirements.	HCWD is currently rolling out Neogov Learning Management System (LMS).	The training policy needs to include safety-related training for all employees and contractors. The Safety Department will monitor each department's compliance with stated training requirements.	

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Develop Training Plan (to be maintained by the CSO and provided to SSO/FTA by request).	CSO maintains the PTSCTP training plan for Key SMS personnel. The Operations Training Manager and Director – Professional Standards and Training share other comp. training program responsibilities. A comp. program that combines all efforts has not been started.	The training policy needs to include specific requirements and monitoring activities for contractor safety training.	Team is working on incorporating training requirements in Safety's review of upcoming procurements, focusing on long-term contracts and capital projects. Construction safety has new emphasis with creation of Occupational Safety & Health division within Safety.
	Establish 3-year plan for engaging external training providers, including TSI, NSC, and others.	One TSI course will take place on-site in FY 2022. CSO is requesting additional courses. A 3-year plan is under development.	Develop and provide biennial refresher training after completion of initial requirements per 49 CFR Part 672, which must require one hour of safety oversight training.	Complete
Miscellaneous	Participate in ferry operator-led safety meetings; hold joint meetings	Ferry operator management attends ESSC meetings and is very responsive. A joint full-scale exercise was also held with the operator, Port of New Orleans, USCG, and other stakeholders.	Ensure that exercises (e.g., full-scale, tabletop) are held annually, both internally and with external agencies.	Fire/emergency drill coordination meeting is currently scheduled with all parties. RTA has participated in numerous hurricane drills and exercises over the last 12 months. RTA also participated in a USCG mass-casualty exercise.

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Drug & Alcohol Program is in development and will be aligned with organizational structure changes, effective October 1, 2020.	Complete	Integrate ferry operations into RTA's SMS.	Not applicable

APPENDIX F: RTA BOARD OF COMMISSIONERS RESOLUTION

Placeholder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