New Orleans Regional Transit Authority

AGENCY SAFETY PLAN

Effective: ~~January~~ February XX, 2026

New Orleans Regional Transit Authority

2817 Canal Street

New Orleans, Louisiana 70119

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New Orleans Regional Transit Authority Agency Safety Plan

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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 SharePoint intranet site and is exclusively maintained by designated Safety Department staff. Printed and emailed copies of this document are uncontrolled and may not be current.

This plan is complemented by, and dependent on, other supporting policy documents issued by RTA as referenced herein and is updated at least annually in accordance with RTA policy and with federal and state requirements. The Chief Safety, Security, and Emergency Management Officer determines the initial distribution for this document.

Revisions/Amendments

Version Year	Revision No.	Effective Date	Revised Sections	Purpose
2021	0	7/15/2020	All	Initial issue of PTASP-compliant safety plan (49 CFR Part 673)
2021	1	3/23/2021	All	Incorporates major organizational structure changes
2022	0	1/25/2022	All	Initial issue; minor updates
2023	0	12/13/2022	All	Aligns with FTA requirements announced in Feb. 2022 Dear Colleague letter, stemming from Bipartisan Infrastructure Law
2024	0	1/23/2024	All	Aligns with changes to statutory safety plan requirements, includes organizational structure changes
2025	0	1/28/2025	All	Aligns with changes to FTA and LADOTD requirements including 49 CFR Parts 670, 672, 673, and 674. Incorporates organizational structure changes. Incorporates updates to 5-year SMS Implementation Plan (SIP). Incorporates new Risk-Based Inspection provisions per LADOTD.
2026	0	XXXXXXXX		

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 formally establishes and reinforces RTA's commitment to a comprehensive Safety Management System (SMS) as required by the Federal Transit Administration (FTA) in 49 CFR Parts 670, 672, 673, and 674) and also by the Louisiana Department of Transportation and Development [LADOTD, herein referred to as the State Safety Oversight Agency ("SSO")] in its State Safety Oversight Program Standard (SSOPS)[2]. FTA, other federal agencies, and the SSO have access to review any policy or procedure referenced in this ASP and any related SMS documentation upon request.

The ASP is specifically developed to:

- Establish the Safety Program for RTA.
- Identify both shared and individual roles and responsibilities for RTA staff, management, and formally established safety committees for the safety of its entire system.
- Provide formal documentation of RTA's commitment to safety together with RTA's Safety Management Policy (SAF3) and other policies.
- Provide a framework for implementing RTA's Safety Management Policy, and specifically, its comprehensive adoption of the four components of SMS (Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion) in accordance with federal and state requirements.
- Establish minimum, comprehensive safety training requirements as required by FTA which must be incorporated into other RTA policies and procedures related to agency-wide training.
- Ensure compliance with FTA's National Public Transportation Safety Plan (NSP) relative to safety goals, objectives, and targets[3] that are established by FTA.
- Satisfy federal, state, and local laws, codes, ordinances, and regulations.

The RTA provides public transportation services to the City of New Orleans, Orleans, St. Bernard, and Jefferson Parishes. The RTA system includes five streetcar lines, 28 bus routes, paratransit service, and two passenger ferry lines, all of which is supported by FTA through the Urbanized Area Formula Funding Program (U.S.C. Section 5307) as well as a combination of state and local funding sources. RTA does not provide any Section 5307 funds to any other entity to provide transit services.

Note: 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 Marine Department and Chief Transit Officer (CTO), the Chief Safety, Security, and Emergency Management Officer

[2] La. Admin. Code tit. 70 § IX

[3] Including Risk Reduction Program Targets that are required under 49 U.S.C. § 5329(d) and codified in the NSP (version 2, April 2024). Also see https://www.transit.dot.gov/regulations-and-programs/safety/national-public-transportation-safety-plan.

(CSSEM) 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.

All positions described in this plan are directly employed by RTA unless otherwise noted. Staff serving as project or contract managers are responsible for ensuring contractors comply with the ASP and any referenced policies and procedures.

As SMS Executive, the CSSEM 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 and related federal requirements. Each subcomponent is addressed in this ASP.

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

This ASP outlines RTA's mature SMS pursuant to federal and state safety plan requirements. It is important to note that there are several companion documents to this Plan that describe the specific tasks, activities, milestones, and steps that RTA continuously undertakes to achieve and maintain a compliant SMS and enhance safety. Where feasible, these documents are incorporated into one or both of the following: 1) RTA's SMS Implementation Plan (SIP; see APPENDIX E: SMS IMPLEMENTATION PLAN), and 2) 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 to the SSO. For specific implementation status inquiries, contact the Safety Department.

Section I: Safety Management Policy

1.1 RTA'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 RTA SharePoint intranet site and via ADP (for employees). It is reviewed and updated annually to ensure it aligns with the ASP and vice versa. As SMS Executive, the CSSEM is responsible for maintaining and updating the Safety Management Policy in accordance with FTA requirements under 49 CFR Part 673.23. All updates to SAF3 must first be reviewed and approved by the Executive Leadership Team (ELT), the Accountable Executive, and finally by the RTA Board of Commissioners under current RTA policy.

1.2 Safety Performance Measures and Targets

Under the requirements of 49 CFR Parts 670 and 673, the ASP must incorporate specific Safety Performance Measures (SPMs), as well as corresponding Safety Performance Targets (SPTs) and Risk Reduction Program Targets (RRPTs) for those measures.[4] While SAF3 refers to these targets, the SPTs and RRPTs themselves are incorporated into this Plan as follows—

- **SPTs** – see APPENDIX A: 2025 SAFETY PERFORMANCE AND SAFETY RISK REDUCTION PROGRAM TARGETS, #S1-S14. Established by RTA in this ASP.
- **RRPTs** – formally established by the Labor-Management Safety Committee (LMSC) as required in 49 CFR Part 673.19(d)(2), and to the extent practicable, incorporated in APPENDIX A (as reference only). See #R1-R8. Note: The official RRPTs are required to be set by the LMSC and as such are found in meeting minutes and other materials maintained exclusively by the LMSC. These materials are available on the RTA SharePoint, Safety Committees site.

~~**2025 REVISION NOTE**: The PTASP final rule (49 CFR Part 673) was released in April 2024, while the annual ASP revision for the 2025 ASP was mid-cycle. Considering the revision cycle under SOP #004-002 and requirements under the SSOPS, the LMSC would have ideally reviewed the RRP data and set targets accordingly in its regular June 2024 meeting. Because this was not feasible, and the union was simultaneously engaged in an election cycle, **the CSSEM will establish interim baseline RRPTs, applying to the 2025 ASP revision cycle only.**~~

~~Additionally~~Note:~~,~~ the RRPTs, Assaults on Transit Workers (#R7) and Rate of Assaults on Transit Workers (#R8) are not possible to set because the National Transit Database (NTD) has not yet collected three (3) years of data on "assaults" as defined by FTA. RTA is anticipating this data will be made available by FTA some time in 2026; therefore the related RRPTs will be deferred until "2027 targets" are ready for review by the

[4] RTA is required to establish RRPTs and a "risk reduction program" under 49 U.S.C. 5329(d)(4) as amended by the Bipartisan Infrastructure Law, because it is a Section 5307 recipient that serves an urbanized area with a population of 200,000 or more.

LMSC.

NOTE: Where any SPT is a duplicate of any RRPT, the RRPT takes precedence to avoid any conflict and ensure compliance with FTA regulations.[5] These targets are denoted with an asterisk (*). Currently, there are seven (7) overlapping targets.

The two different sets of corresponding targets, SPTs and RRPTs, are summarized in the table and subsections, below.

Refer to page 12 of the NSP for descriptions of each SPM.[6] Generally, measures are based on National Transit Database (NTD) thresholds and definitions.

SPTs ***Established in ASP, See Appendix A*** **** overlapping target, RRPT takes precedence***		
#	**Appendix A #**	**SPT**
1	**S1**	**Major Events* (Refer to #R1)**
2	**S2**	**Major Event Rate* (Refer to #R2)**
3	**S3**	**Collision Rate* (Refer to #R4)**
4	**S4**	**Pedestrian Collision Rate**
5	**S5**	**Vehicular Collision Rate**
6	**S6**	**Fatalities**
7	**S7**	**Fatality Rate**
8	**S8**	**Transit Worker Fatality Rate**
9	**S9**	**Injuries* (Refer to #R5)**
10	**S10**	**Injury Rate* (Refer to #R6)**
11	**S11**	**Transit Worker Injury Rate**
12	**S12**	**Assaults on Transit Workers* (Refer to #R7)**
13	**S13**	**Rate of Assaults on Transit Workers* (Refer to #R8)**
14	**S14**	**System Reliability**
RRPTs ***Established by LMSC, Refer to Appendix A as reference only*** **** overlapping target, RRPT takes precedence***		
#	**Appendix A #**	**RRPT**
1	**R1**	**Major Events***
2	**R2**	**Major Event Rate***
3	**R3**	**Collisions**
4	**R4**	**Collision Rate***

[5] See page 14 of the NSP. "Recipients… may choose to use the target set by the Safety Committee for the safety risk reduction program for both measures, provided the target for the safety risk reduction program is set using a 3-year rolling average of NTD data.
[6] https://www.transit.dot.gov/regulations-and-programs/safety/national-public-transportation-safety-plan

5	**R5**	**Injuries***
6	**R6**	**Injury Rate***
7	**R7**	**Assaults on Transit Workers***
8	**R8**	**Rate of Assaults on Transit Workers***

1.2.1 Safety Performance Targets (SPTs) Under the National Public Transportation Safety Plan

FTA's NSP identifies 14 SPMs[7] for which RTA must establish and monitor SPTs in each operating mode subject to the PTASP regulation: streetcar, fixed-route bus, and non-fixed-route bus (paratransit).[8]

For seven (7) of the required SPTs, the overlapping RRPTs take precedence—RTA is electing *not* to establish separate targets that could potentially conflict with the mandated RRPTs. After accounting for these SPTs that have overlapping RRPTs, there are seven (7) remaining SPTs that are established and monitored by RTA (also see APPENDIX A: 2025 SAFETY PERFORMANCE AND SAFETY RISK REDUCTION PROGRAM TARGETS).

SPTs are established annually during the ASP revision cycle in coordination with all pertinent departments, members of the ELT, SMS Steering Committee, 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. These targets are established to serve as benchmarks for evaluating the effectiveness of the agency's safety practices and protocols and to drive continuous improvement.

1.2.2 Safety Risk Reduction Program Targets (RRPTs) Under the National Public Transportation Safety Plan

FTA's NSP identifies eight (8) SPMs for which RTA must establish and monitor safety RRPTs as part of its Risk Reduction Program under 49 CFR Part 673.11(a)(7), in consultation with the LMSC, which is designated by RTA as its joint labor-management Safety Committee in accordance with 49 CFR Part 673.19. (Also see 2.6 Risk Reduction Program.) These must be set for each operating mode subject to the PTASP regulation: streetcar, fixed-route bus, and non-fixed-route bus (paratransit). Note: Out of the eight (8) RRPTs, seven (7) overlap with the required SPTs. See related note, above, in 1.2 Safety Performance Measures and Targets in reference to the handling of overlapping targets.

[7] See page 12 -- https://www.transit.dot.gov/regulations-and-programs/safety/national-public-transportation-safety-plan
[8] RTA's ferry service is excluded from this ASP, and therefore these SPT provisions, because it is exempt from the requirements of 49 CFR Part 673.

RRPTs are established by the LMSC, annually, for the following calendar year. In turn, the targets are reflected in the ASP revision for the corresponding year.

Note: ~~The official RRPTs are required to be set (through simple majority vote) and as such are found in official meeting minutes. These minutes are available on the RTA SharePoint, Safety Committees site.~~ The current RRPTs are ~~incorporated into~~provided in APPENDIX A: 2025 SAFETY PERFORMANCE AND SAFETY RISK REDUCTION PROGRAM TARGETS.

(See SOP #004-011 for additional information. Additionally, see *1.4.2.1 Safety Committee Requirements* Related to the SMS.)

1.3 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. On or about September 15th, the CSSEM provides a draft to both Safety Committees for review.

On or about November 1st, the CSSEM ensures that the draft ASP is prepared for tentative approval from the SSO. A response from the SSO is typically received within 30 days of submittal.

Upon receipt of tentative approval from the SSO, the CSSEM then sends the ASP to the LMSC followed by the RTA Board of Commissioners for review and approval in accordance with 49 CFR Part 673.11(a)(1). The internal process for review, revision as needed, and approval is found in RTA SOP #004-002.

1.3.1 Maintenance of the ASP

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

1.4 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 as well as in SAF3 and the Safety Committee Structure Policy (SAF5).

1.4.1 Key Individual SMS Accountabilities and Responsibilities

Chief Executive Officer

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 Safety Management Policy and related SMS-related policies 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 Safety Management Policy, SMS-related policies, and respective area-specific SMS requirements to all employees in their areas
- Approving this ASP and the Transit Asset Management Plan ("TAM Plan"),
- Ensuring that risk is appropriately addressed system-wide; and directing resource allocation accordingly
- Directing required actions to address non-compliance with the ASP or substandard performance in the agency's SMS
- Managing continuous improvement activities.

Additionally, the following specific requirements apply to how the CEO receives and handles certain safety risk mitigations:

- The Accountable Executive must implement safety risk mitigations for the Safety Risk Reduction Program that are described in 2.6 Risk Reduction Program under 49 CFR Part 673.11(a)(7)(iv).
- The Accountable Executive must consider all other safety risk mitigations recommended by the LMSC, consistent with requirements in 49 CFR Parts 673.19(d) and 673.25(d)(6).
    - Additionally, if the Accountable Executive decides not to implement the safety risk mitigation unrelated to the Risk Reduction Program, there are additional actions required by FTA—they must prepare a written statement explaining their decision, and also submit and present it to the Board of Commissioners.

Chief Safety, Security, and Emergency Management Officer

The CEO has delegated the authority and responsibility for day-to-day implementation and operation of the SMS to the CSSEM. The CSSEM serves as the RTA's SMS Executive and as such, is the agency's Subject Matter Expert (SME) on SMS and related federal and state requirements.

The CSSEM reports directly to the CEO per the requirements of 49 CFR Part 673.23(d)(2). The CSSEM chairs, facilitates, and provides technical assistance to each of the safety committees established by SAF5 (or, alternatively, may delegate to a director for this role). The CSSEM may also invite the SSO or appropriate

representative to participate in any safety committee established by SAF5.

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

The CSSEM 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 CSSEM 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 assessments, mitigations, and/or corrective actions. Once risk is assessed, each department will provide documented results of the assessment(s) to the CSSEM who will maintain a master hazard log as necessary. Generally, this process is managed "by exception," meaning areas identified as normal or ongoing hazard mitigation or resolution activities (e.g., pre-trip inspections, preventive maintenance, purchase orders) are not re-entered on the CSSEM's log every day, but rather exceptional events, such as new and previously unforeseen hazards, instances of practical drift, and deficiencies or concerns identified in safety event investigations, will be entered and promptly managed in close coordination between the department and the CSSEM.

The CSSEM 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 CSSEM provides training for the agency in emergency-related areas including emergency exercises and drills. The CSSEM is responsible for developing and implementing an all-hazards approach to emergency planning and response, in close coordination with all other departments.

As RTA's executive officer overseeing physical security and law enforcement functions, the CSSEM is responsible for SMS compliance in these areas and for developing, maintaining and implementing a range of plans, programs and processes related to public safety. Additionally, the CSSEM conducts regular Threat and Vulnerability Assessments (TVAs) and other audits, examinations, and reviews to assess the agency's readiness and resiliency.

The CSSEM 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 and related annexes
- 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
- 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 training or awareness campaigns in coordination with Operations Training and other departments
- Maintaining and monitoring CAP and Hazard Logs for the agency (which shall serve as the agency's "master" versions of such), and supporting and assisting departments in implementing mitigations and/or corrective actions as appropriate
- Overseeing contractor, RTA employee, and the general public's safety during construction activities in coordination with the Capital Projects Department
- Developing and conducting training as needed with external agencies, i.e., emergency responder training, contractor training, and emergency drills
- Participating in and leading formal meetings with LADOTD, ELT, and other RTA management on safety issues
- Developing and supporting safety, emergency management, and system security policies, procedures, and programs
- Implementing the Internal Safety Management Audit (ISMA) Program in compliance with SSO requirements and this ASP
- Supporting and facilitating the Safety and Security Certification (SSC) Program in compliance with this ASP and the Safety and Security Certification Plan (SSCP)
- Overseeing and supporting departmental assessments, investigations, inspections, and SA activities to ensure compliance
- 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
- Leading and overseeing all physical security and day-to-day Transit Police functions, including in-house and contracted elements, for the agency
- Serves as RTA's designated point of contact (POC) for communication with FTA regarding Public Transportation Safety Certification Training Program (PTSCTP) matters as required in 49 CFR Part 672.21(3)(b) including semiannual reporting.

1.4.2 Organizational SMS Accountabilities and Responsibilities

Beyond the accountabilities and responsibilities of the CEO and CSSEM, the subsections describe in greater detail those that are owned by: RTA safety committees; leadership/executive management; and all staff.

The current organizational chart is found as APPENDIX B: ORGANIZATIONAL CHART for reference. The chart will be updated with each update of this ASP.

1.4.2.1 Safety Committee Requirements Related to the SMS

The Safety Management System (SMS) Steering Committee (SMSSC) and the LMSC both play pivotal roles in enhancing safety and compliance within the organization in accordance with the RTA Safety Committee Structure Policy (SAF5), this Plan, and the related provisions of 49 CFR Part 673.

The SMSSC, composed of members of the ELT, provides strategic direction for implementing the SMS across all departments. Its responsibilities include overseeing safety goals and objectives, coordinating and monitoring Corrective Action Plans (CAPs), and reviewing/advising on revisions to safety policies. The committee ensures interdepartmental collaboration on safety initiatives, in line with the ASP and SSO requirements. It also monitors safety performance, develops and implements mitigations to reduce safety risk associated with the consequences of hazards, and fosters continuous leadership engagement in the SMS process.

The LMSC, on the other hand, is a collaborative platform where front-line employees and management come together to address safety concerns and workplace conditions. This committee ensures a balanced approach to safety by incorporating input from both represented and non-represented staff, while also ensuring compliance with labor and safety regulations.

Relative to RRPTs and, more broadly, the Risk Reduction Program, the LMSC has specific roles and responsibilities in accordance with 49 CFR Part 673.19, also discussed in 2.6 Risk Reduction Program. These include:

- **Monitoring and Review:** The LMSC monitors the agency's performance against all RRPTs throughout the year. The committee reviews safety data, identifies trends, and recommends corrective actions as necessary to ensure that the agency meets or exceeds the targets for which it has primary responsibility per 49 CFR Part 673.19.
- **Reporting:** The LMSC shall report on the agency's performance against RRPTs at regular intervals to the SMSSC. This report will include an analysis of the data, any identified challenges, and proposed strategies for improvement.
- **Accountability:** The Safety Committee will be accountable for ensuring that the RRPTs are realistic, achievable, and reflective of the agency's commitment to safety.

All LMSC members must enroll in and complete the Transportation Safety Institute (TSI) course entitled "SMS Awareness" which is available online via TSI's e-learning portal[9]. This must be completed within one year of being appointed to serve as an LMSC member. The certificate must be provided to the Human Resources (HR) Department for recordkeeping in the Learning Management System (LMS).

Together, these committees work to ensure a comprehensive and collaborative approach to organizational safety.

Additional information can be found in the RTA Safety Committee Structure Policy (SAF5) and SOP #004-011.

1.4.2.2 SMS Responsibilities for All Management and Staff

All RTA leadership, executive management, and staff in all functional areas are responsible for the common requirements of SMS listed in this section, as required by 49 CFR Part 673.23(d):

1. Safety Goals and Objectives: In consultation with the CSSEM, each area monitors progress to ensure all safety goals, objectives, and targets (as applicable) are being met. This is primarily monitored and reviewed in ELT and SMSSC meetings. Adherence to or support of established safety goals and objectives may also be incorporated into the annual agency and departmental work plans and/or performance evaluation processes for certain staff.
2. SMS Training:
   - Rail – Key SMS Personnel identified by the CSSEM in this ASP as having direct responsibility for safety oversight of the rail fixed guideway system must meet the requirements of 49 CFR Part 672, including refresher training at two-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. The CSSEM is responsible for ensuring the agency's compliance with this regulation. (See 1.4.3 Key SMS Personnel with Direct Responsibility for Rail Fixed Guideway Safety Oversight for more information.)
   - Director-level – As required by the CEO, all directors and above must self-enroll in and complete the TSI course, "SMS Awareness" which is available online via TSI's e-learning portal[10]. This must be completed within one year of being hired or promoted into the position. The certificate must be provided to the HR Department for recordkeeping in the LMS. Corresponding policy and position description revisions are currently in development.
   - All Other Personnel – Personnel not identified as Key SMS Personnel should be proficient in SMS methodologies and practices, and knowledgeable about all safety program requirements. All are required to take the "SMS 101" training delivered in new-hire orientation.

[9] https://tsi-dot.csod.com/client/tsi-dot/default.aspx
[10] https://tsi-dot.csod.com/client/tsi-dot/default.aspx

3. 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, to the Operations Control Center (OCC), via the online "Help Desk" ticket system, directly to Safety Department personnel, to a department manager, or through a safety committee. -The process includes reporting assaults on transit workers, near-misses, and unsafe acts and conditions.
4. 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 CSSEM, 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. SAF3 describes SRM and SA roles and responsibilities that all staff share. All employees in all areas must comply with this policy.
5. 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 CSSEM on SMS implementation progress. The SMSSC reserves time during its standing meeting for receiving and reviewing implementation status. The Safety Department compiles status notes from all other departments into an SMS Implementation Plan (SIP) Update which it updates on a quarterly basis, makes available via the Safety Committees SharePoint site, and provides to the SSO as required.
6. Participation in ISMAs: Progress relative to SMS implementation objectives and compliance with the ASP and referenced policies and procedures are reviewed during recurring ISMAs, led by the Safety Department. 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 CSSEM in accordance with SOP 004-100: Procedure for Performing Internal Safety Management Audits (ISMAs). (Also see 3.3 Internal Safety Reviews.)
7. 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.
8. Contractor Oversight: Functional areas are responsible for safety management oversight of all contractor activities (for contracts which they directly manage or oversee), documentation and safety management processes, and documentation of those oversight activities. If specific safety requirements are formally directed by the CSSEM or attached to either associated procurement documents or the final contract, the staff designated as "project manager" is responsible for

complying. The department should consult with the Safety Department for technical assistance.

1.4.2.3 Additional SMS Responsibilities by Level

In addition to what is outlined above, there are three levels of the organization that each warrant a closer look at roles and responsibilities relative to implementing and advancing the SMS:

1. Executive Level Management
2. Technical Management and Supervision
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. It is highly recommended that this evaluation be incorporated into the employee's formal performance review or appraisal.

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

Executive level:

All members of the ELT share key SMS responsibilities.

Each ELT member is responsible for ensuring adherence to these responsibilities and accountabilities in their respective area(s) and/or department(s).

As of the adoption of this ASP, the following positions comprise the ELT and share the responsibility to ensure both that the ASP is followed consistently and that the SMS is functioning as intended:

- Chief Executive Officer (CEO)
- Chief Safety, Security, and Emergency Management Officer (CSSEM)
- Chief Transit Officer (CTO)
- Chief Asset Management Officer (CAMO)
- Chief of Planning and Capital Projects (CPCP)
- Chief of Staff
- Chief External Affairs Officer
- Chief Human Resources Officer (CHRO)
- Chief Strategic and Financial Officer (CSFO)~~FO)~~
- Chief Legal Officer (CLO)

Each member of the ELT is also a designated member of the SMS Steering Committee (SMSSC) in accordance with SAF5.

ELT members 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 activities such as audits or reviews are fully documented and follow a standard process.
5. Safety performance goals and objectives, both in their areas of control and agency-wide, are being met, and safety performance measures, including SPTs and RRPTs, monitored for verification or needed corrective action.
6. They participate fully in the SMSSC 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 and related policies and procedures.
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 employees, where appropriate.
11. Adequate safety training, awareness and oversight is provided to employees in their area(s) of control.
12. A positive safety culture is actively fostered in their area and agency-wide.
13. Full and open cooperation is affected with State Safety Oversight activities, federal authorities and other external safety agencies as required.

Technical management and supervision level:

Technical managers (typically, senior directors, directors, and managers) and supervisors (depending on departmental structures and position duties) are charged with the following:

- ensuring directives from the executive level are implemented,
- 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 tasks, and reporting

to leadership when there is difficulty obtaining them,
- providing information pertinent to the management of safety to employees,
- encouraging the timely reporting of hazards, and
- assuring safety is incorporated in all daily tasks and activities.

Technical managers and supervisors 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 safety promotion within their areas of control.
2. Ensure employees receive proper training to perform job functions safely.
3. Ensure employees are properly supervised to ensure tasks and activities are occurring in a safe manner.
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 substandard safety performance and cooperatively work to implement mitigations and/or corrective actions to address deficiencies.
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. Attend training that will support safe job performance.
3. Safely carry out assigned tasks in accordance with training and procedures.
4. Communicate effectively with other employees, supervision, and management.
5. Foster a positive safety culture system wide.

1.4.2.4 Additional SMS Responsibilities by Function

Additional SMS responsibilities are assigned to key functional areas/departments as described in this sub-section. All functional areas identified in this ASP are deemed "safety critical" to the extent that they support safety objectives in the Safety Management Policy and/or the activities under one or more SMS components described in this Plan.

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 and executive leadership of each area.

The areas are organized by ELT member, current as of the issue date of this ASP.

Chief Transit Officer

Bus, Rail, and Paratransit Service Delivery ("Operations")

Note: The Chief Transit Officer (CTO) also has responsibility for Marine Operations, however, the ferry mode is exempt from the requirements of 49 CFR Part 673. Therefore, for the purposes of this ASP, safety responsibilities related to marine operations are similar in scope and complexity to that described for other modes. For more information, contact the CTO or the Director of Marine Operations.

RTA's CTO, Directors of Bus and Rail, Director of Mobility Services and Alternative Modes, and respective Managers are 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 bus and rail operators, senior supervisors, and supervisors
- Ensuring attendance in all mandatory trainings and meetings
- Maintaining, reviewing, and revising any operational Rulebook in coordination with the CSSEM
- Implementing rules compliance programs for operators, dispatchers, training instructors, and 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 taking corrective action as necessary
- Investigating employee reports of hazards and taking corrective actions as necessary
- Equipment inventory and tracking
- Managing employee discipline
- Safety messaging
- Ensuring representation on appropriate safety committees.

In addition to the above responsibilities, the Director of Mobility Services and Alternative Modes and team of Managers are responsible for:

- Training, assigning, and monitoring paratransit operators, reservationists, supervisors, dispatchers, and support staff in support of safe delivery of paratransit services
- Investigating and managing customer complaints and taking corrective action as necessary
- Investigating employee reports of hazards and taking corrective actions as necessary
- Ensuring compliance of all aspects of the paratransit operations with the Americans with Disabilities Act (ADA) and related federal requirements
- Safety messaging.

Bus, Rail, and Paratransit Communications

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 and collective bargaining agreements
- 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 and incidents in coordination with the Safety Department, other RTA departments, the New Orleans Police Department (NOPD) Transit Police Unit, and other stakeholders
- Development, review, and implementation of day-to-day SOPs for the safe operation of all modes of transit service, in coordination with (respective) directors, the Safety Department, and other departments
- Dispatching (respective) operations supervisors and other staff to incidents and accidents as necessary, and closely coordinating with Safety Department in connection with events
- Internal safety messaging.

Operations Training

The (Senior) Manager is fully responsible for SMS compliance in the development and delivery of training—including new-hire, mandatory (annual) refresher, and post-accident training—for transit operations personnel. The training department's direct involvement in new-hire training for maintenance employees is typically limited to vehicle operation and defensive driving per company standards, while additional hands-on training is carried out within the corresponding maintenance division.

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

- Development, delivery, and review of all official 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
- Operator re-certification/re-qualification (or similar; currently in development)
- New-hire training for Operations employees on SMS principles, including hazard identification and reporting
- Refresher or re-certification training campaigns on an as-needed basis, such as in support of the reopening or recommissioning of lines, routes, services, or facilities.

Chief Asset Management Officer

Maintenance (All Modes)

Under the direction of the CAMO, Maintenance Divisions for all assets (vehicles, infrastructure, facilities, and equipment) are responsible for the following safety-critical functions:

1. Transit Asset Management
2. Maintenance Training (excludes CDL training and training on the operation of RTA revenue service vehicles)
3. Warranty Programs
4. Preventative and Corrective Maintenance
5. Work Orders and Documentation
6. Materials Management
7. Maintenance Quality Assurance
8. Specialized Maintenance Training

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 assets
- Training all maintenance staff in emergency/safety procedures and injury and illness prevention as appropriate, in coordination with the Safety and Emergency Management Departments
- Administering warranty programs for rolling stock and equipment
- Providing necessary mechanisms for reporting defects and hazardous conditions
- Administering and monitoring standardized programs, policies, and procedures,

and respective Maintenance Plans
- Supporting investigations of safety incidents and accidents as requested by the Safety Department
- Coordinating with the Safety Department and other stakeholders in the development of design specifications for, and formal acceptance of, new (revenue and non-revenue) vehicles and vehicle-borne, safety-critical systems
- 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
- Coordinating with the CSSEM on safety requirements of materials
- Monitoring safe handling of and minimizing employee and environmental exposure to potentially hazardous products and materials.
- Approving (jointly with the CSSEM) and implementing the RTA Safety and Health Handbook which establishes OSHA-compliant policies, procedures, and rules for workplace safety.

Specifically, for Rail Infrastructure Maintenance (Including Maintenance-of-Way, or MOW, and Traction Power)--

- Assuring that rail 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
- Supporting Safety Department-led accident/incident investigations
- 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.

Specifically, for 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
- Ensuring there are no unauthorized modifications to vehicles and equipment

The Maintenance Department is responsible for developing and delivering certain training, directly, for its personnel. The specific training that an employee receives is based on their position description. Maintenance performs the following activities in this regard:

- Development and delivery of official agency training curricula materials, including for safety-critical positions, tasks, activities, processes, methods, and programs that are specific to Bus, Rail, and Paratransit Maintenance areas.
- Safety maintenance training program and development and quality assurance
- Develop, review, update, and implement Standardized Maintenance Procedures (SMPs)
- Monitoring and oversight of maintenance training records including evaluation of the effectiveness of the overall training program
- Quality assurance evaluations (standardized maintenance procedures, etc.) and follow-up coaching with technicians, as necessary.

Facilities Maintenance

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
- 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
- Assuring compliance with local fire and life safety codes and requirements including alarm systems, fire hoses, and protective equipment in coordination with the Safety Department
- Assuring compliance with local, state, and federal environmental protection and hazardous waste requirements.

Fleet Advancement

The Director of Fleet Advancement and their team are responsible for:

- Assuring that all vehicle fleet technology hardware 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
- 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

Specific to fleet technology—
The team 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.

Transit Stop Maintenance

The Transit Stop Manager develops, manages, and administers all aspects related to streetcar and bus stop maintenance, temporary relocations or closures, improvement projects related to asset management, and ADA compliance. The Transit Stops Manager also helps manage contracts for stop maintenance including shelter maintenance, cleaning, repair, and security. The position performs the following safety-related tasks:

- Manages all property landscaping, trash removal, amenity state of good repair, and facility repairs
- Manages the installations, removals and operational maintenance of all RTA shelters and associated amenities
- Manages all vendors involved with the maintenance of RTA assets including but not limited to shelters, benches, and trash pickup
- Coordinates with City of New Orleans on trash collection at bus and streetcar stops and provides recommendations to improve and streamline services
- Proposes shelter placements and types in accordance with RTA guidelines
- Assists in the development of specifications and guidelines related to stops and shelters
- Manages customer complaint resolution and questions. Develops and manages bus and streetcar operator feedback.
- Creates and maintains a master transit stop inventory for RTA Operations and Capital Projects departments for use by the staff using data from automatic passenger counters and scheduling software. (Planning and Scheduling determines locations and requirements and secures permitting for signs and shelters.)

Chief of Planning and Capital Projects

The CPCP has the responsibility for and oversight of the following areas:

1. RTA's Capital Plan
2. Project Delivery and Oversight
3. Safety and Security Certification (SSC)/Acceptance and the Safety and Security Certification Plan (SSCP)
4. Service Planning and Scheduling
5. Information Technology (IT)

Capital Project Delivery and Oversight

As required, the Capital Projects team may be assisted by a Program Management Consultant, Construction Management Consultant, General Architectural and Engineering Consultant, and/or other contractors.

The Director of Capital Projects will ensure that all contractors and consultants comply with the provisions of this ASP.

The SSC/Acceptance process is an important SA activity that is carried out jointly by the Safety and Capital Projects teams and is governed separately by the SSCP. The SSCP is developed, maintained, and implemented jointly by the CPCP and CSSEM. Depending on the scope, complexity, and initial risk assessment associated with each project, the Project Manager (as tasked by the Director of Capital Projects) and Safety Department staff follow the guidelines contained in the SSCP to determine whether a capital project or system modification requires SSC or Acceptance, and to what degree. Projects and system modifications are also jointly reviewed through a Management of Change SOP. (Also see 3.6.1 Safety and Security Certification.)

Service Planning and Scheduling

The Service Planning and Scheduling team performs the following safety-critical activities:

- System route analysis
- Scheduling and run-cutting for all fixed routes in coordination with the Operations departments and consistent with provisions of the collective bargaining agreement
- Station and stop locations and amenities
- Accessibility issues regarding RTA facilities and stops
- Community outreach

A responsibility of the Service Planning and Scheduling team that supports RTA's Management of Change processes is to incorporate a safety risk management review into the service adjustment ("pick") process, to ensure that hazards and accident/incident trends are taken into consideration when modifying, adding, or removing service. 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 pursuant to its Service Standards SOP. If necessary (based on the associated level of safety risk), the CSSEM formally tracks long-range mitigations to completion, through either Mitigation Monitoring Plans, CAPs, or other means.

Additionally, for phased implementation of large transit network redesign projects, the Service Planning and Scheduling Department engages 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.

Information Technology

Information Technology (IT) 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
- Computer-Aided Dispatch (CAD) and Clever Devices tools for OCC
- Maintenance Management Information Systems
- Risk and vulnerability assessments of IT systems agency-wide
- Security badging hardware, software, and equipment
- Hardware and software for audio/video equipment
- 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.

Chief Strategic and Financial Officer

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~~CSFO, the Office of Internal Audit and Compliance, is responsible for conducting any Internal Safety Management Audits (ISMAs) of the Safety Department through a standing, mutual agreement.

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

1. Strategic and Partnership Development
~~1.~~2. Budget Development and Administration

3. Grants Administration
~~2.~~4. Continuous Improvement
~~3.~~5. Procurement
~~4.~~6. Third Party and Internal Audits
~~5.~~7. DBE Compliance
~~6.~~8. Revenue Collection
~~7.~~9. Accounting

Procurement

RTA's Procurement ~~(Senior)~~ 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 CSSEM, the ~~(Senior)~~ Director assesses the level of safety risk associated with procurements and takes appropriate action in accordance with federal and state requirements. Additionally, safety must be managed in storage, warehousing, transportation, accounting, distribution, and disposal of all assets managed jointly by the department and the end-user department. This includes ensuring that information acquired in the procurement process is effectively communicated to the end users.

Office of Internal Audit and Compliance (OIAC)

RTA's Office of Internal Audit and Compliance (OIAC) functions under the oversight of the CFO and partners with the Safety Department to enhance and ensure the safety, cataloguing, development, and monitoring of internal processes.

The OIAC's principal responsibilities in safety management include ensuring the RTA's compliance with current FTA safety standards, conducting internal safety audits and compliance checks, and devising and executing the RTA Annual Audit Plan, which may incorporate safety-related assessments.

Chief External Affairs Officer

Customer Service

The (Senior) Manager of Customer Service (consisting of "Rideline" and "ADA" or "eligibility" teams at present) 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.

Intergovernmental Affairs

The Intergovernmental Affairs team has the responsibility for the following safety-critical activities:

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

Marketing and Communications

Marketing and Communications is responsible for public relations, internal and external communications, marketing and retail sales, streetcar charters, advertising, film production and creative services.

The team also designates individuals to serve as RTA's Public Information Officer (PIO) under RTA's All Hazards Plan and related annexes.

The Marketing and Communications team coordinates closely with the Safety and Emergency Management departments to create and launch a variety of safety and emergency preparedness campaigns for RTA customers and the general public throughout the year.

Chief Human Resources Officer

RTA's Chief Human Resources Officer (CHRO) Officer reports to the Accountable Executive. The CHRO is fully responsible for SMS compliance in the HR areas.

The CHRO manages hiring, employee information, worker's compensation, administrative organizational development, company-wide training/certification, and employee programs. HR is responsible for ensuring 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.

This department also administers and oversees the Workers Compensation ~~and Drug and Alcohol~~ Program~~s~~ in accordance with federal and state requirements.

Safety-critical activities include:

1. Talent Acquisition
2. Employee/Labor Relations
3. Talent Management

4. Compensation
5. Benefits
6. Employee Assistance Program (EAP)
7. Equal Employment Opportunity (EEO) Compliance
8. Document Management
9. Worker's Compensation matters
10. ~~Drug and Alcohol Program~~

Commented [SM1]: As of 2025, now resides in CSSEM; Will revise both sections.

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 as needed
- Accurately documenting hiring and other employment processes
- Managing recruitments based on direction from ELT, budget, and approved criteria
- EAP, including wellness services, including nutrition, injury prevention, financial counseling and physical and mental health
- Developing, implementing, and monitoring the Drug & Alcohol program in accordance with US DOT and FTA requirements
- Investigating complaints and incidents related to conduct in the workplace and recommending corrective actions as necessary
- Managing labor relations and all collective bargaining unit matters, inclusive of grievances, arbitration, and negotiation of contracts, currently with respective locals of the Amalgamated Transit Union (ATU), International Brotherhood of Electrical Workers (IBEW), and United Labor Unions (ULU)
- Maintaining centralized training records for the agency, including but not limited to: ethics training, FEMA ICS training, attendance of mandatory safety meetings, and SMS training.

Chief Legal Officer

RTA's Chief Legal Officer (CLO) reports to the Accountable Executive and is responsible ~~for reviewing~~for reviewing, advising on, and executing legal agreements and contracts on behalf of the agency, and establishing and reviewing RTA policies from a legal/compliance perspective. The ~~CLO also~~CLO is also responsible for risk management, liability claims (with the assistance of a third-party administrator who manages the day-to-day functions), and insurance policies to which the agency is bound.

Chief of Staff

This position is currently vacant. This section will be updated. ~~A restructuring of the organization in 2024 resulted in many of the former Chief of Staff's safety-critical duties being reassigned to the Chief External Affairs Officer.~~

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

Apart from the level- and function- specific SMS responsibilities described above, certain "key SMS personnel" [49 CFR Parts 673.23(d)(5) 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 PTSCTP codified at 49 CFR Part 672. As of the adoption of this revision of the ASP, the key SMS personnel are:

- CSSEM
- All Safety Department and Emergency Management Department staff

The CSSEM serves as RTA's designated point of contact (POC) for communication with FTA regarding PTSCTP matters as required in 49 CFR Part 672.21(3)(b) including semiannual reporting.

The Safety Department, under the CSSEM's direction, coordinates a review of the status of required training per the PTSCTP during the annual review and revision of the ASP. The CSSEM 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, 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. Per 49 CFR Part 672.13(d) key SMS personnel must now complete two elements as part of their refresher training:

1. Specific recertification training defined by FTA, and
2. Recertification training defined by RTA, which must include, at a minimum, one (1) hour of safety oversight training.

1.5 Integration with Emergency Management

RTA develops, maintains, and implements all emergency management documentation as required by 49 CFR Part 673.11(a)(6)(i), hereby incorporated by reference. Jurisdictional agreements, including Memoranda of Agreement/Understanding (MOU/MOA Cooperative Endeavor Agreements), 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 CSSEM unless otherwise noted in the CAP.

The CSSEM 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 to the extent practicable. The CSSEM uses SMSSC and/or ELT meetings and proceedings to ensure a strong level of cross-departmental coordination on emergency management matters. Additionally, the CSSEM 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. RTA All Hazards Plan and annexes
2. ~~Memoranda of Understanding/~~Cooperative Endeavor Agreements with law enforcement and emergency management partners
3. Emergency Exercise Plan
4. After Action Reports

Documents are available on the SharePoint intranet site under Emergency Management. They are reviewed annually in conjunction with revisions of this Plan.

1.6 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 CSSEM 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, SMSSC meetings, ISMAs, strategic planning coordination, 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. The list is for reference only and is not exhaustive.

An up-to-date list of controlled, final versions of safety procedures is maintained on the SharePoint intranet site and are also available upon request. Current versions of agency policies are maintained on the intranet site under “RTA Policies,” in accordance with the “Creation of Policy” Policy (HC49).

At present, a formal, agency-wide process for developing, reviewing, updating, and maintaining procedures is under development.

1.7 Roadway Worker Protection (RWP) Program

RTA has~~is currently~~ revised~~ing~~ its RWP program in accordance with 49 CFR Part 671~~.~~[11] and is currently in the process of implementing new related training and protocols. ~~FTA requires RTA to submit the program for initial review and approval by the SSO and then establish the program by December 2, 2025. The SSO must also review and approve each subsequent update.~~ RTA's compliance with the RWP program will be discussed in quarterly compliance reports sent to the SSO, and will be audited annually by the SSO. The format of the quarterly compliance report is in development at this time.

~~RWP training is required for any employee or contractor that, in the course of their RTA-issued duties, may reasonably have to access or perform work in or along the RTA portion of the City of New Orleans right-of-way ("trackway") or whose work may foul the trackway at any point.~~

~~Currently,~~ RWP training is delivered in-person by qualified Safety Department staff. A computer-based refresher module is currently in development and is anticipated to be completed by the end of 2026~~5~~. Training consists of two levels:

- Basic Training (Level 1):
(Operators, supervisors, other transit workers) – 2 Hours (estimated)
  - Certification/Recertification (Valid for 2 years):
    - Written Exam (Passing Score >80%)
    - Field Exercise Proficiency Assessment (Documented participation in field exercise)

**This training will serve as refresher training for all levels of certification.*

- Advanced Training (Level 2):
(Roadway Workers In Charge --RWICs, Flag/Watch Person, Lone Worker, All Rail Maintenance) - 4 Hours (estimated)
  - Certification (Valid for 2 years):
    - Written Exam (Passing Score >80%)
    - Field Exercise Proficiency Assessment (Documented participation in field exercise)

~~Refresher training is required every two (2) years after initial certification in accordance with 49 CFR § 671.41(a)(4).~~

~~When completed and approved by the Executive Leadership Team and the SSO, the RWP Manual, initial training, and refresher training content will be incorporated into this Plan by reference.~~

[11] https://www.federalregister.gov/documents/2024/10/31/2024-25042/rail-transit-roadway-worker-protection

Also see RTA's Roadway Worker Protection Manual, developed and maintained in accordance with 49 CFR § 671.13.

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 CSSEM.

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 Infectious Disease Hazards

The SRM process is applied to identifying strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions. To the extent that any hazards are associated with known infectious diseases based on data and information provided by the Centers for Disease Control and Prevention (CDC) and/or state health authorities, SRM actions will be carried out in a manner that is consistent with guidelines provided by those authorities. This is pursuant to the infectious disease provisions under 49 CFR Part 673.25(b)(2)(ii).

More information on how the RTA manages hazards related to infection diseases can be found in Annex B: Infectious Disease Annex in the RTA's All Hazard Plan.

2.2 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. To ensure proper recordkeeping as required by FTA and SAF3, department managers are responsible for providing regular updates to the Safety Department regarding hazards and mitigations taken.

2.2.1 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)(i), as well as industry experience, best practices, and lessons learned.
5. The Safety Department reviews Board of Commissioners and Riders Advisory Council meeting minutes for reported hazards and safety concerns. Hazards are elevated to the master Hazard Log as appropriate, based on safety risk.

2.2.2 Employee Reporting Systems

RTA has multiple avenues by which employees and contractors can report hazards. Investigations of hazards are also ~~properly~~ conducted in accordance with ~~documented per~~ SOPs #SAF-SOP-001 and SAF-SOP-002. ~~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 under SAF5; or by contacting the Safety Department directly.

Frontline Operations Department personnel also have the option of reporting the hazard to OCC, who will in turn input the proper information in Clever Incident Manager for handling by the appropriate internal party(ies). If an item requires the attention of the City of New Orleans or another external entity, the Safety Department generally serves as the primary point of contact on the matter until it is resolved.

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
- Vorex "Help Desk" application (accessible via the RTA Intranet)
- Hazard Report Form (employees can submit the form to any of three labeled drop boxes: A. Philip Randolph (Canal) facility, Carrollton, or East New Orleans (ENO)).

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, "Vorex." This tool is convenient for staff to use and provides increased trend analysis capabilities.

Customer Service manages customer safety complaints, which are forwarded to the responsible department as applicable. The department investigates the report and develops and implements corrective action as needed, in coordination with the Safety Department if it is safety-related. 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 whenever possible. If the employee has not reported anonymously, the responsible (Technical or Executive Level) manager or CSSEM ensures that the results of the investigations and any corrective action are reported back to the reporting employee. For hazards entered in Vorex, the Safety Department is currently developing an "SMS ~~corner~~dashboard" on the intranet site coupled with postings on bulletin boards at all facilities, ~~which will consist of both a designated section of Safety Department-maintained bulletin boards as well as a dashboard on the RTA intranet site and will~~ to share status updates on reported hazards with all personnel.

~~For hazards or issues that are deemed "unacceptable" following the SRM process, the outcome of the report, investigation, corrective action, or mitigation is formally elevated to the SMSSC as appropriate.~~

(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 SAF3, any employee who reports a valid violation, unsafe act or condition, or other safety concern directly to the Safety Department will not experience any reprisal from management. SAF3 also stipulates that such reprisal is not allowed if reported to any (other) member of (Technical or

Commented [SM2]: Will ensure this is aligned with latest update of SAF3 which is concurrent.

Executive Level) management. The CSSEM will promptly forward to the ~~Chief HCWD Officer~~CHRO any allegations or claims that this provision in SAF3 was violated during the handling of an employee-reported hazard or safety concern. 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.

2.2.3 Hazard Investigation

Hazards are investigated in each department as they are reported or identified. Department management identified in this ASP are considered primary points-of-contact and initial investigators. If necessary, the investigator may route the investigation to the Safety Department for additional technical support in accordance with SOP #~~004-005~~SAF-SOP-002. All investigative activities are properly documented according to the SOP and as required by the "SMS Documentation" provisions of this Plan.

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

Table 1: Safety Risk Severity (Adapted from Table 2-4 from Rail Transit Agency Accident Investigations – Background Research, FTA[12])

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.

The assessment of likelihood and severity shall consider any existing safety risk mitigations as appropriate.

2.3 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 CSSEM, investigator, or other designee who is trained and qualified to perform such assessments. 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).

[12] Rail Transit Agency Accident Investigations - Background Research, last updated July 2022

SAFETY RISK INDEX					
	Safety Risk Severity	1	2	3	4
Frequency of Occurrence	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 level of safety risk acceptance is classified as one of the following: high, medium, low, or acceptable. At this point in the process, any assessment resulting in an SRI of low, medium, or high must be reported to the Safety Department. The CSSEM or designee will advise the investigator or department point-of-contact on next steps.

For acceptable hazards, the investigator or department point-of-contact is responsible for documenting the safety risk assessment. The Safety Department may audit the department's records.

For low, medium, or high hazards, the department representative, CSSEM or designee, and (if warranted) the SMSSC, shall jointly review and determine the appropriate mitigations for reducing the level of safety risk to an "acceptable" level to the extent practicable. The CSSEM, in coordination with SMSSC, determines whether the action(s) need(s) to be prioritized based on safety risk acceptance, and if so, how that prioritization shall occur.

For worst credible outcomes/consequences that are rated **high** or **medium**, the SSO must be notified as soon as practicable or no later than the conclusion of the safety risk assessment. The CSSEM is directly responsible for notifying the SSO.

SRI	Acceptance Criteria	Special Conditions	Approval Level
High	Unacceptable	**Requires immediate resolution.** Results must be recorded on Safety's Hazard Log and immediately reported to SMS Steering Committee*	CEO, CSSEM
Medium	Undesirable	**Actions require SMS Steering Committee and CSSEM review and approval.** Results must be recorded on Safety's Hazard Log*	CSSEM

Low	Acceptable with Review	**Requires dept. management review in consultation with CSSEM or designee**. Results must be recorded on dept. Hazard Log and managed by investigator or dept. POC, with follow-up provided to CSSEM as directed	Dept. ELT
Acceptable	Acceptable	**None – Can be managed at department-level**. Investigator or dept. POC is responsible for recordkeeping. Safety may audit dept. Hazard Log	Dept. Investigator/ POC

Table 4: Safety Risk Acceptance Criteria

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 ELT must be notified, the CSSEM may recommend calling an emergency meeting of the ELT and/or SMSSC as appropriate.

2.4 Safety Risk Mitigation

Safety risk mitigations are methods to eliminate or reduce the severity and/or likelihood of a potential (worst credible) consequence of a hazard.[13] To the extent practicable, given constraints to budget and resources, the CSSEM shall prioritize mitigations based on SRIs, following the methodology described in 2.3 Safety Risk Assessment and Prioritization. ELT members share the responsibility to ensure that when the SRI is identified, the corresponding actions and approval levels in Table 4 are promptly adhered to.

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.

[13] 49 CFR Part 673.5

The general, preferred hierarchy of mitigations at RTA, based on FTA guidance, is:

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

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

- Front-line employees (and contractors) are trained to recognize and report hazards, and on what actions may be required of them to mitigate them, such as corrective maintenance, development of new training, stop hazardous work, use of PPE, rules compliance, use of Incident Command, and setting up barriers.

- Technical managers and supervisors 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 SRI and if resources are not available, ensure that no activities take place until the level of safety risk is mitigated to an acceptable level.

The CSSEM shall advise whether a CAP is required to facilitate the necessary actions to mitigate the safety risk to an acceptable level.

The CSSEM will monitor mitigations and (if applicable) corresponding CAPs to ensure consistency and compliance with the ASP. CAPs are submitted electronically to the SSO by the CSSEM for approval once the CAP is opened. Not all mitigations require a formal CAP to be submitted to the SSO. (Also see 3.7.1 Corrective Action Plans (CAPs).)

Safety risk assessments, prioritizations, mitigations, and corresponding CAPs for high and medium SRI-rated hazards will be reviewed jointly in the SMSSC. Similarly, updates concerning low and acceptable SRI-rated hazards may be reviewed in the SMSSC or through other means at the discretion of the CSSEM.

Risk still inherently exists even after mitigation; the department is responsible for monitoring the mitigation, in coordination with the CSSEM or designee, and promptly reporting if the mitigation is ineffective or introduces unintended hazards. The CSSEM will advise the department whether a Mitigation Monitoring Plan (MMP) is required, and if so:

- What level of documentation is sufficient and how it should be provided to the CSSEM,

- Who is responsible for implementing the MMP, and
- What should be entailed in the monitoring.

(Also see Section III – Safety Assurance.)

2.4.1 Safety Risk Mitigations Related to Risk Reduction Program Matters

Pursuant to Safety Committee and Risk Reduction Program provisions of the PTASP final rule[14], RTA shall 1) engage the LMSC and 2) follow specific, additional protocols when developing, implementing, and reviewing any mitigations that correspond with hazards or concerns that FTA has explicitly required RTA to include in a standalone **Risk Reduction Program**.

Note: Section 2.6 Risk Reduction Program lists the specific hazards/concerns which FTA has required to be handled through this process in coordination with the Safety Committee. The specific hazards/concerns shall be updated annually (in accordance with SOP 004-002) to ensure alignment with FTA requirements.

If the following three conditions are met, the LMSC may formally recommend a safety risk mitigation related to a Risk Reduction Program matter:

1. A formal risk assessment is required.
2. The mitigation must be formally approved by the LMSC before forwarding as a recommendation. This is accomplished through a vote that is captured in official LMSC meeting minutes.
3. The matter must be included in the current year's ASP, Risk Reduction Program section as a highlighted hazard or concern. (Refer to SOP #004-011 for additional information on this process.)

Forwarded mitigations will be incorporated into the subsequent year's revision of the ASP, Risk Reduction Program section, accordingly. This is required under 49 CFR Parts 673.11(a)(7)(iv).

There are two (2) specific FTA requirements that apply if the above conditions #1-3 are met and mitigations are considered for either of the two hazards that FTA has explicitly required RTA to include in its Risk Reduction Program:

1. Under 49 CFR Part 673.25(d)(3), when identifying safety risk mitigations related to vehicular and pedestrian safety events involving transit vehicles, RTA and the LMSC **must** consider mitigations to reduce visibility impairments for transit vehicle operators that contribute to accidents, including retrofits to vehicles in revenue service and specifications for future procurements that reduce visibility impairments.
2. Under 49 CFR Part 673.25(d)(4), when identifying safety risk mitigations related to assaults on transit workers, RTA and the LMSC **must** consider deployment of assault mitigation infrastructure and technology on transit vehicles and in transit

[14] Including but not limited to: 49 CFR Parts 673.11(a)(7), 673.19(d)(3)(i), and 673.25(d)

facilities. Assault mitigation infrastructure and technology includes barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators.

Another possible trigger for a safety risk mitigation being recommended by the LMSC is if a previous year's RRPT is not met. Consistent with the PTASP final rule, in any instance where RTA did not meet a (previous year's) annual RRPT, regardless of whether: there were no previous mitigations in place, the current mitigations were deemed ineffective or inappropriate, or additional mitigations are needed for continuous improvement purposes, the LMSC may identify and recommend safety risk mitigations it believes are necessary "to reduce the likelihood and severity of potential consequences."[15] (See 1.2.2 Safety Risk Reduction Program Targets (RRPTs) Under the National Public Transportation Safety Plan for additional information.) A safety risk assessment and formal vote to proceed with the recommendation are still required.

In any case where an LMSC-recommended safety risk mitigation is actively being implemented, the normal monitoring, prioritization, reporting, and tracking processes discussed in this Plan still apply. However, a key difference between mitigations corresponding with **Risk Reduction Program** matters and other mitigations is that the agency **must** implement these mitigations in accordance with 49 CFR Part 673.23(d)(1)(i). (Also refer to the Accountable Executive's SMS responsibilities listed in 1.4.1 Key Individual SMS Accountabilities and Responsibilities.)

Like other mitigations, the CSSEM shall advise whether one or more CAPs is required to effectively implement the recommended mitigation(s). The CSSEM will also monitor the mitigation and any corresponding CAPs as applicable. Not all mitigations require a formal CAP. (Also see 3.7.1 Corrective Action Plans (CAPs).)

2.4.2 Safety Committee-Recommended Safety Risk Mitigations Unrelated to Risk Reduction Program Matters

Under the SRM provisions of the PTASP final rule, the LMSC's role in recommending safety risk mitigations unrelated to the Risk Reduction Program is also tied to specific requirements. The Accountable Executive must consider mitigations recommended by the LMSC that do not relate to any Risk Reduction Program hazards or concerns.[16]

When upon considering the recommended mitigation, the Accountable Executive elects not to implement it, FTA requires them to "prepare a written statement explaining their decision…(and) submit and present this explanation to the transit agency's Safety Committee and Board of Directors or equivalent entity."[17]

2.5 Tracking

[15] 49 CFR Part 673.19(d)(3)(i)
[16] See 49 CFR Part 673.23(d)(1)(ii)
[17] 49 CFR Part 673.25(d)(6)

The department identified as having tracking responsibilities in Table 4, above, must document all SRM activities associated with each hazard and consequence and provide regular status reports to the CSSEM, to executive leadership, or to the corresponding safety committee, as appropriate. Using these reports as well as the official Safety Department Hazard Log, Department Hazard Log, and other documentation, the CSSEM tracks mitigations 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 one sheet with all hazards whose assessed SRI meet either the high or medium threshold. ~~Note: An export from the Vorex tracking system is currently under development and is intended to serve as the CSSEM's primary tool for communicating the status of all "low/acceptable" hazards.~~

The Hazard Log is reviewed by the SMSSC during regular meetings and is shared regularly with the 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 CSSEM 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.

2.6 Risk Reduction Program

Title 49 U.S.C. § 5329(d) as amended by the Bipartisan Infrastructure Law, requires transit agencies that are Section 5307 recipients and serve an urbanized area of 200,000 or more to include in their ASP a Safety Risk Reduction Program ("Risk Reduction Program").

In accordance with 49 CFR Part 673.11(a)(7), this section constitutes the Risk Reduction Program. It will be revised annually as part of the ASP revision cycle (SOP 004-002). Incorporating by reference other policies, documents, and ASP sections as appropriate, this section:

1. Addresses the reduction and mitigation of vehicular and pedestrian safety events involving transit vehicles that includes safety risk mitigations consistent with 49 CFR Part 673.25(d)(3);
2. Addresses the reduction and mitigation of assaults on transit workers that includes safety risk mitigations consistent with 49 CFR Part 673.25(d)(4); and
3. Includes (by reference) the safety performance targets set by the Safety Committee for the safety risk reduction program performance measures established in the NSP ("RRPTs").

The Risk Reduction Program is an ongoing effort that will be regularly evaluated and refined based on performance data, incident reports, and feedback from employees and the community. RTA remains committed to continuously improving safety outcomes and achieving the RRPTs set by the Safety Committee.

RTA will continue to review guidance and regulations in connection with Risk Reduction Program hazards, concerns, and specific mitigations that FTA requires all agencies to consider and will update this section accordingly.

2.6.1 Current Hazards or Concerns for the Risk Reduction Program

Summary of Adverse Outcomes From FTA-Identified Hazards or Concerns (Based on Most Recent FTA Requirements)						
	Outcome	**Related Measure(s)** [18]	**RRPT established in ASP?**	**Prev. Year's RRPT met?**	**Current Mitigations in Place?**	**LMSC-Rec. Miti-gation(s) in ASP?**
1	**Vehicular and pedestrian safety events involving transit vehicles**	**3, 4**	**Yes**	**Yes ~~N/A – first year of required RRPT~~**	**Yes**	**No**
2	**Assaults on transit workers**	**7, 8**[19]	**Yes**	**N/A – ~~first year of required RRPT~~not enough data available**	**Yes**	**No**

[18] See RRPT table in 1.2.2 Safety Risk Reduction Program Targets (RRPTs) Under the National Public Transportation Safety Plan.
[19] Note: RRPTs 7 and 8 are not possible to set because the NTD has not yet collected three (3) years of data on "assaults" as defined by FTA.

RTA is committed to reducing the level of safety risk associated with the identified hazards or concerns above. To achieve this, the agency has implemented a comprehensive Risk Reduction Program that 1) includes a review of existing mitigations, 2) measures performance using the RRPTs set by the Safety Committee, and 3) fosters continued collaboration with the Safety Committee to explore additional mitigations, if necessary.

In connection with other ongoing strategies and initiatives to improve employee and patron safety, the Risk Reduction Program aims to reduce the number and rates of accidents, injuries, and assaults on transit workers. This program is designed to proactively identify and analyze the hazards(s)—including an in-depth look at sub-elements such as environmental factors, equipment configuration, training, and sufficiency of procedures—and collaboratively develop meaningful mitigations.

2.6.1.1 Vehicular and Pedestrian Safety

To address vehicular and pedestrian safety events, RTA has implemented and will continue to implement the following:

- **Internal and External Outreach Programs:**
  The agency will conduct outreach programs aimed at raising awareness about vehicular and pedestrian safety. These programs will involve collaboration with local communities, stakeholders, and the general public to promote safe behaviors around transit vehicles and at transit stops.

- **Operator Training:**
  RTA will provide ongoing, mandatory training for transit operators focusing on safe driving practices, defensive driving techniques, and pedestrian awareness. This training will equip operators with the skills needed to prevent events and respond effectively to potential hazards.

2.6.1.2 Assaults on Transit Workers

To reduce the risk of assaults on transit workers, the agency will continue to implement the following measures:

- **Mandatory Training:**
  -All transit operators, road supervisors, and maintenance employees will undergo mandatory training focused on recognizing warning signs, de-escalation, personal safety, and how to handle situations involving aggressive or violent behavior. This training will be designed to prepare staff for potential scenarios and reduce the likelihood of assaults occurring. ~~This has been in development since late 2023.~~

- **Additional Security Coverage:**
  Leveraging security grant funds, in the 2025 solicitation for system security services (RFP 2025-031), RTA added a roving 24-hour post to the scope of services and new contractual requirements to enhance security coverage

throughout the system.

2.6.2 Risk Reduction Program Targets

As a transit agency serving an urbanized area of 200,000 or more, RTA is required to establish (through its designated Safety Committee, the LMSC) RRPTs for each of the performance measures identified in the NSP.

(Also see related sections 1.2.2 Safety Risk Reduction Program Targets (RRPTs) Under the National Public Transportation Safety Plan and APPENDIX A: 2025 SAFETY PERFORMANCE AND SAFETY RISK REDUCTION PROGRAM TARGETS.)

2.6.3 Incorporation of LMSC-Recommended Safety Risk Mitigations

As of this writing, there have not been any related safety risk mitigations formally recommended by the LMSC. If a safety risk assessment results in the LMSC recommending mitigations for RTA's consideration (through an official vote) the provisions of 2.4.1 Safety Risk Mitigations Related to Risk Reduction Program Matters shall apply. This will include the consideration of specific types of mitigations as required by FTA, namely reductions to "visibility impairments for transit vehicle operators" and "assault mitigation infrastructure and technology on transit vehicles and in transit facilities." (Also refer to 2.4.1 Safety Risk Mitigations Related to Risk Reduction Program Matters.)

LMSC-recommended mitigations may either be provided in this section of the ASP or maintained in a separate document and incorporated by reference, at the CSSEM's discretion.

Additionally, it should be noted that if safety risk mitigations are formally recommended by the LMSC and subsequently added to (or incorporated in) this section of the ASP, under 49 CFR Part 673.23(d)(1)(i), the Accountable Executive must implement the mitigations.

2.6.4 Required Actions if RTA Does Not Meet a Risk Reduction Program Target

Under the Risk Reduction Program provisions of the PTASP final rule, a large, urbanized area provider that does not meet an established RRPT must:

1. Assess associated safety risk, using the methods or processes established in Section II: Safety Risk Management.
2. Mitigate associated safety risk based on the results of a safety risk assessment. The transit agency must include these mitigations in a plan to address the deficiencies under the direction of the Accountable Executive.[20]
3. Allocate its safety set-aside in the following fiscal year to safety-related projects eligible under 49 U.S.C. 5307 that are reasonably likely to assist the transit agency in meeting the safety performance target in the future.[21]

[20] See 49 CFR Part 673.27(d)(4)
[21] See 49 CFR Part 673.27(d)(3)(iii)

Section III: Safety Assurance

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

In accordance with FTA requirements for Safety Committees under 49 CFR Parts 673.19(d)(3)(ii) and 673.19(d)(3)(iii), LMSC members are responsible for identifying any safety risk mitigation which they believe to be ineffective or not implemented as intended and for identifying safety deficiencies for purposes of continuous improvement.

3.1 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.

3.1.1 Safety Data Analysis

Under SAF3, RTA departments must identify, collect and analyze data on their safety critical functions in close coordination with, and at the direction of, the CSSEM or designee.

Sources of data ~~at RTA~~ that are required to be submitted to the CSSEM or designee 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
- ISMAs 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
- Training and certification records
- Safety committee activities and reports
- Roadway Worker Protection (RWP) Program data, including job safety briefing and good faith challenge forms

Each department submits its data related to safety performance and mitigation monitoring, to the executive in its area for review and verification. The CSSEM may request this documentation as part of the agency-wide SA effort. Executives are expected to discuss data and safety performance at SMSSC meetings as appropriate. Safety performance data are also reviewed by the RTA Board of Commissioners at their request.

3.1.2 Risk-Based Inspections (LADOTD)

In October 2022, FTA issued Special Directive 22-32, under authority of 49 U.S.C. § 5329(k) and 49 CFR § 670, requiring that LADOTD develop and implement a risk-based inspection (RBI) program of the rail transit agencies it oversees. An RBI program uses qualitative and quantitative data analysis to inform ongoing inspection activities. RBI programs are designed to prioritize inspections to address safety concerns and hazards associated with the highest levels of safety risk. As described in 49 U.S.C. § 5329(k), the SSO developed policies and procedures for inspection access and data collection in consultation with RTA, with the program taking effect following its adoption into Louisiana Administrative Code in 2024.

RBIs are conducted by SSO staff and contractors with support from the RTA. They do not replace existing inspections conducted by RTA described elsewhere in this ASP and other safety policy and procedure documents.

The RBI program is organized by FTA into six categories, which are summarized in this section. Some categories necessitate the development of agency-specific procedures, many of which are currently in development. These procedures will follow guidelines provided by the SSO in Appendix F of this Plan, which contains RTA's RBI Procedures Manual addressing those sections. When these procedures are developed and receive the concurrence of appropriate Executive and Senior Leadership Team members, they will be incorporated into this Plan by reference.

3.1.2.1 Category 1: SSO Authority

In 2014, Louisiana Revised Statute 48:214 re-identified LADOTD as the SSO, granted it the authority to “enter onto and inspect the property of operators of fixed guideway rail systems receiving federal funds without prior notice” to the extent necessary to fulfill its obligations under federal law, and provided it with the authority to implement rules and regulations as necessary to comply with federal law. To meet requirements introduced by 49 U.S.C. § 5329(k), the SSO updated its SSO Program Standard located in Louisiana Administrative Code 70:IX.Chapter 15 in 2024. This update gives the SSO the authority to collect and analyze data regarding safety program implementation at NORTA and to access each RTA property, with and without advanced notice, for the purposes of conducting inspections into RTA activities regarding the implementation of its safety program.

3.1.2.2 Category 2: RBI Policies and Procedures

Category 2 describes how and when the SSO will access RTA facilities for RBIs, conducting inspections at the RTA four times per year at minimum. The SSO has the authority and capability to conduct inspections with or without notice, and these inspections can occur at any time deemed necessary based on the SSO’s review of RBI data. RTA will provide SSO staff and contractors with an escort for all inspections of publicly inaccessible areas. Inspections will include infrastructure, equipment, records, personnel, and data. Also see APPENDIX F: RBI PROCEDURES MANUAL.

3.1.2.3 Category 3: Data Sources and Collection

Category 3 addresses what data will be collected by the SSO from the RTA. RTA will submit safety, inspection, and maintenance data elements quarterly as part of the RBI process, except for capital projects and financial data submitted annually. The SSO may increase this frequency if necessary to evaluate systemwide safety risk. RTA must share data that supports trend analysis and the prioritization of inspections, including safety, maintenance, inspection, administration, and other data elements with the SSO, as is required in 49 U.S.C. § 5329(k)(2) and 5329(k)(4). The data elements and metrics used to inform prioritization, as well as the processes for sharing and securing data, have been established in collaboration with the SSO. Also see APPENDIX F: RBI PROCEDURES MANUAL.

3.1.2.4 Category 4: Inspection Prioritization

Category 4 explains how the SSO will prioritize inspections based on relative risk. The SSO uses a safety risk index based on the same industry standard (MIL-STD-882E) as RTA’s Safety Risk Index from Section II: Safety Risk Management. The SSO uses its safety risk index to identify equipment, facilities, or procedures whose potential failures intersect at higher levels of severity and probability to receive higher overall risk ratings. The highest scoring equipment, infrastructure, and practices will be prioritized for inspection first. The SSO’s data analysis and prioritization process is ongoing and will be updated to reflect changing safety conditions. When system conditions change, the SSO will analyze new data and develop new prioritization ratings; these will inform potential revisions to inspection priorities. Unless required by activities or changes in system safety, the SSOA will schedule and perform an updated safety analysis and

inspection prioritization at a minimum, annually.

3.1.2.5 Category 5: RBI Program Commensurate with RTA Size and Complexity

Category 5 requires that SSO inspection policies and procedures are tailored to RTA's risk profile based on its size and complexity. Considered a small and noncomplex system based on its mode, physical characteristics, and operational characteristics (as reported in NTD), the SSO will conduct at least four onsite RBIs annually. If the RTA streetcar system changes in a way that affects its risk profile, the SSO will update inspection policies to account for this change.

3.1.2.6 Category 6: SSO Staffing, Qualification, and Training

Category 6 describes the staffing and training requirements SSO program staff and contractors must meet to effectively implement and manage a risk-based inspection program. In addition to the general technical training requirements required for SSO personnel in 49 CFR Part 672, the SSO will coordinate with RTA to ensure staff also have the specific skill sets and knowledge necessary to carry out the SSO program at RTA. This includes completing RTA trainings specific to system components identified in the SSO's Technical Training Plan (TTP).

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, 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~~ RTA Streetcar Rulebook and/or (Operations) Employee Manual (as appropriate). 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 CSSEM.

All Rulebook and (Operations) Employee Manual revisions must be reviewed and approved~~ in a committee format,~~ as described in ~~the~~ both ~~Rulebook~~documents. ~~Note: A significant revision of the Rulebook is currently in development. Status updates regarding the development of the Rulebook may be provided in LMSC and/or SMSSC meetings as appropriate.~~

Operations and Maintenance 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. Cloud-based applications are being evaluated which are intended to help with coordination between Operations, and Safety personnel concerning rules compliance in the field.

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 Parts 673.27(b) and (revised in the 2024 release of the SSO final rule) 674.27(a)(5). They are Internal Safety Management Audits; ongoing monitoring of SPMs, SPTs, and RRPTs; and Safety Department-led SA reviews, audits, and inspections.

3.3.1 Triennial Internal Safety Management Audit Program (ISMAs)

This program is owned and overseen by the Accountable Executive and implemented by the Safety Department. Each SMS component and subcomponent and the related activities and functions described in this ASP is audited once every three (3) years in accordance with this schedule on a rotating basis:~~. Individual ISMAs (performed once annually) are organized by their corresponding SMS component~~

- ~~(Safety Management Policy,~~ Year 1: Safety Risk Management~~,~~
- Year 2: Safety Assurance, and
- Year 3: Safety Policy and Safety Promotion~~), in order to foster and enhance collaboration between auditors and auditees and to reinforce the principles and basic framework of SMS to continuously improve the RTA's safety culture.~~

~~Note: Safety Assurance and Safety Promotion are proposed to be combined in one year, tentatively scheduled for 2025, to ensure all four components are covered in the required three-year timespan.~~

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. Specifically, the regulation now requires RTA to submit a report documenting all internal safety review activities and the status of subsequent findings and corrective actions.[22]

SOP 004-100 dictates how ISMAs are administered, including a requirement that prior notice is given to the SSO and ~~and all ISMA activities adhere to SSO requirements. F~~final audits are shared with the SMSSC for review. ~~and may be discussed at subsequent SMSSC meetings.~~

The CSSEM is ~~tasked~~ responsible ~~with~~ for overseeing the process and ensuring compliance with federal and state requirements and alignment with industry best practices and standards.

~~The rolling three-year calendar for upcoming ISMA topics is provided in the Annual Report due to the SSO on or around February 15th of every year. The CSSEM may recommend changes to the topic list in-between Annual Reports, pending SSO~~

[22] See 49 CFR Part 674.27(a)(5)(iv)

~~concurrence.~~

As of 2021, the audit of the Safety Department's SMS compliance is performed by the Office of Internal Audit and Compliance (OIAC).

3.3.2 Safety Department-led Safety Assurance

Key SMS personnel, at the direction of the CSSEM, conduct periodic, unannounced SA inspections or field observations to ensure compliance with safety-critical rules and procedures.

The CSSEM 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 or other document as directed by the CSSEM. The Safety Department has developed both online (SharePoint-based) and paper forms specific to certain, higher risk activities, e.g., special streetcar operations, flagging/Maintenance-of-Way, and special track work. Findings, trends, and concerns are presented to ELT, department management, and/or safety committees, as appropriate.

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 not following a procedure/official training or committing an unsafe act. These one-on-one coaching sessions are then documented using a standard form. Additional, web-based and mobile-ready SA forms are currently in development in cooperation with the Bus and Streetcar Operations Department leadership.

3.3.3 Monitoring of Safety Performance Measures

Monitoring of the system wide SPMs identified in 1.2 Safety Performance Measures and Targets1.2 Safety Performance Measures and Targets requires all departments that collect data directly applicable to the Performance Measures report these measures to the CSSEM or designee at their request. Generally, progress relative to the SPTs and RRPTs set forth or referenced in the ASP will be reviewed in SMSSC meetings and/or other ELT meetings. Progress relative to some targets is also presented in a Monthly CEO Report and in various public RTA 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 CSSEM 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.

[Also see 3.7.1 Corrective Action Plans (CAPs).]

3.4 Safety Assurance: Maintenance and Support Functions

In addition to the above SA activities that apply for all departments, there are maintenance and related support functions under the purview of the CAMO, specifically.

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

a. Preventive, predictive, and corrective maintenance – rail, bus, paratransit/automotive/non-revenue maintenance, MOW (rail infrastructure), and facilities maintenance
b. Support activities, including contracted activities (component repair, equipment repair, overhaul, metrology, transportation, mainline recovery, fabrication)
c. Hazard management, quality assurance and quality control
d. Lifecycle Planning, including reliability and maintainability
e. Supply chain, procurement and materials management and warehousing
f. Fleet management and transit stop maintenance
g. 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~~SAF-SOP-002. 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 are the responsibility of the CSSEM and the Safety Department. These include: any events which meet a reporting threshold for the SSO and/or FTA, any events classified as "Tier 1" by RTA, and any events otherwise ~~deemed serious~~requested by the CSSEM.

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 (for rail only). Upon receipt of formal approval, actions are coordinated and managed by the CSSEM 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 CSSEM, 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. 49 CFR § 674.33 requires RTA to notify the SSO and FTA within two hours of the following types of events:

- Fatality
- Two or more injuries
- Derailment
- Collision resulting in one or more injuries
- Collision between two rail transit vehicles
- Collision resulting in disabling damage to a rail transit vehicle
- Evacuation for life safety reasons
- Unintended rail transit vehicle movement.

~~The two-hour notification requirement excludes criminal actions that result in fatalities or injuries.~~

RTA adheres to the reporting and notification requirements outlined in 49 CFR Part 674 and related guidance.

Means of reporting to the SSO are defined in the SSOPS. FTA is notified through the US DOT Crisis Management Center (CMC) by email at toc-01@dot.gov. Refer to SOP #~~004-005~~SAF-SOP-002 for more detailed information.

RTA and the SSO jointly review safety event investigations and notifications, including the status of reports and related corrective actions. Also see 3.7.1 Corrective Action Plans (CAPs).

3.6 Management of Change (MOC)

The Management of Change (MOC) process is designed to identify and assess changes that might introduce new hazards or negatively affect the agency's safety performance. RTA is dedicated to identifying such changes for further evaluation to ascertain if they can reasonably lead to adverse impacts.

The CSSEM employs a Director-led Configuration Management Committee (CMC). This committee, which operates as an SMS Subcommittee under the CSSEM, is responsible for reviewing Change Request Forms submitted by various RTA Project Managers. Within the MOC framework, a project manager is defined as any individual overseeing the implementation of a change in RTA's transit system that might pose a potential hazard. Such changes can either introduce new hazards or influence the suitability or efficiency of existing mitigation measures.

Whenever a change occurs, it must undergo evaluation via the SRM, as though it is a newly identified hazard. Refer to Section II – SRM for details.

The primary goal of the MOC Procedure is to guide and unify the actions taken to gauge the risk level associated with significant changes. However, the process might encompass minor changes that might lead to potential safety hazards. This procedure aligns SAF5, the SSCP, and the relevant section of this ASP.

Every department and functional area is tasked with identifying changes, conducting a preliminary assessment, and then escalating and forwarding any concerns to the CMC based on the determined safety risk level.

As the SMS Executive, the CSSEM escalates the analysis and any subsequent actions or mitigations to either the SMSSC or the Accountable Executive as appropriate based on a preliminary assessment of risk and/or other considerations. The CSSEM is authorized to require additional safety risk mitigation measures before approving a change. If the safety risk level remains unclear, or if there is a need for more technical expertise to determine risk, the designated representative from the CSSEM department may lead this analysis.

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.

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. When evaluated or considered through any SRM process, the evaluation or analysis must be properly documented.

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

3.6.1 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 CSSEM 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 SSCP which is jointly maintained by the CPCP and CSSEM. It is based on industry best practices, FTA guidance, and an American Public Transportation Association (APTA) Recommended Practice (RP), Document # APTA SS-ISS-RP-008-24.[23]

The Safety and Security Certification Review Committee (SSCRC) reports to and receives direction from the SMSSC and provides guidance for RTA's SSC program.

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, under the SRM process, 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 must be forwarded to the Safety Department for handling. Modifications may be subject to the Management of Change (MOC) Procedure as deemed appropriate by the CSSEM. Additionally, internal safety reviews and external audits of the Capital Projects and Maintenance Departments will include a careful review of this process, to ensure it is performing as intended.

3.6.3 Procurement

[23] Available at https://www.apta.com/research-technical-resources/standards/security/apta-ss-iss-rp-008-24/

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. Alternatively, through the internal, Automated Procurement System, the CSSEM "signs off" on all solicitation requests, change order requests, sole source requests, and state contract procurement requests. During this review stage, the CSSEM or designee considers whether the procurement creates a new hazard or otherwise elevates risk for the agency. The System allows the CSSEM or designee to attach additional requirements onto the request via a formal memorandum..
3. If appropriate, mitigations must be in place before the procurement is finalized or 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.

As required in 49 CFR Part 673.27(d)(1)(i), the Continuous Improvement process for safety shall include the identification of deficiencies in both the SMS and the RTA's performance relative to SPTs and (because RTA serves an urbanized area of 200,000 or more) RRPTs. (See 1.2 Safety Performance Measures and Targets for more detailed information.)

As required in 49 CFR Part 673.27(d)(1)(ii), the Continuous Improvement process for safety shall also address the role of the LMSC—as the designated Safety Committee under 49 CFR part 673.

For any RRPT that RTA was unable to meet in the preceding year, the agency must allocate its “safety set-aside” equaling not less than 0.75% of its Section 5307 funds for the year to safety-related projects that are reasonably likely to assist the agency in meeting the safety performance target in the future.

Collectively, the annual ASP revision cycle, SMS Implementation Plan updates, and ongoing SMSSC meeting structure provide a framework for identifying and capitalizing on new opportunities to improve, review, grow, and enhance the SMS. ELT is directly engaged in this process and supports the CSSEM in integrating continuous improvement discussions and initiatives into other standard business processes such as the annual workplan and budget review processes.

Once deficiencies in the SMS are identified, corrective actions must be implemented in accordance with this ASP and applicable SSO requirements. Opportunities for enhancement are also communicated to the appropriate ELT member or the CEO as Accountable Executive for consideration. As SMS Executive, the CSSEM is duly authorized to implement such corrective actions and recommend other enhancements needed to achieve a more mature SMS.

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 not to be confused with mitigations, although in some instances, they may be one in the same or a CAP may have a very similar companion mitigation or vice versa. In either case, the CSSEM is ultimately responsible for monitoring and verifying completion and for ensuring the hazard or concern is adequately addressed.

For hazards with lower-level SRIs, the CSSEM delegates this responsibility to the local department’s point-of-contact, consistent with the SRM provisions in Section II of this Plan.

49 CFR Part 674.37 explicitly requires CAPs to be developed and submitted to the SSO for consideration of approval for the following, at a minimum:

1. Results from (safety event) investigations in which either the SSO or RTA determined that causal and/or contributing factors require corrective action;
2. Findings of non-compliance from safety reviews and inspections performed by the SSO; and
3. Findings of non-compliance from internal safety reviews (“ISMAs”) performed by RTA.

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.

The majority of RTA CAPs stem from one of these three (3) types of sources, above.

All CAPs must be reviewed and approved by the SSO per 49 CFR Parts 674.27(a)(11) and 674.37. CAPs are submitted by the CSSEM to the SSO electronically for approval. Upon obtaining the SSO's approval, they are entered on the CAP log where they are tracked by the CSSEM to closure.

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 SMSSC or other types of meetings involving the leadership of the affected department(s).

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 and updating its comprehensive safety training curriculum for the following types of personnel, pursuant to 49 CFR Part 673.29(a):

- All operations and maintenance personnel, and
- Key SMS personnel (as defined in this Plan).[24]

Training requirements shall be established by this section, in concert with RTA policies and department-owned policies, procedures, manuals, and plans~~. More detailed information about position-specific training requirements can be found in HR's Training Matrix, which was developed pursuant to a recent CAP (#24-01, submitted and closed in 2024).~~.

The development and review of safety-related training programs will include consultation with the ~~Joint~~ Labor-Management Safety Committee (LMSC) to ensure frontline workforce perspectives are incorporated in accordance with 49 U.S.C. § 5329(d).

In support of the overarching comprehensive safety training program, training requirements, whether established at the RTA policy level or by individual departments, shall encompass:

1. Departmental and functional area responsibilities for training, including on-the-job training (OJT) for all levels
2. Specialized internal safety-related training programs [e.g., industrial safety, respirators, first aid/CPR, Blood-borne Pathogens (BBP), and RWP] (Also see 1.7 Roadway Worker Protection (RWP) Program in Section 1.)
3. Topics/elements that are either specifically required in federal regulations or are directed by this Plan or any policies or procedures to which it refers [e.g., accident/incident investigation, safety and security certification, de-escalation, incident management/ Incident Command System (ICS) training]
4. Vendor-provided training controlled by RTA and deemed necessary for safety-critical functions or tasks for the personnel listed above
5. Initial, or new hire, training for each of the personnel listed above
6. Technical training for safety-critical functions or tasks
7. Continuing safety education and training, to include any required re-certification

[24] For the purposes of this ASP, all provisions related to the comprehensive safety training program are focused on these personnel types per the requirements under 49 CFR Part 673.29(a). Additional training may be deemed appropriate and implemented by RTA for these personnel types and for other positions or departments not referenced in this section. For all employee training, also refer to individual position descriptions (see HR), directives, memos, policies, or procedures as applicable.

training whether deemed required by RTA policy or by individual departments

8. Other certifications not included in #7, above
9. Contractor training requirements as applicable
10. Training records creation, access, and maintenance
11. Quality Assurance (QA) for the training programs
12. Train-the-trainer programs
13. Participant (student and trainer) feedback and assessments
14. SMS training (see section 4.1.1 SMS Training Requirements).
~~14.~~15. Evaluation of training effectiveness through post-training assessments or demonstrated competency as part of SMS Assurance.

Instruction in safe practices or methods while performing operations, maintenance, and safety procedures is included in relevant rulebooks, manuals, handbooks, and other documentation, as determined to be necessary and maintained by each respective department in consultation with the HR Department.

The (Senior) Manager of Operations Training (for operations personnel), respective ELT member to whom the identified personnel, above, report, and the Chief Human Resources Officer (or designee) are jointly responsible for developing, implementing, reviewing, and overseeing training programs in accordance with this section.

All new and revised training elements meeting one of the comprehensive safety training area descriptions shall be submitted to the CSSEM for review.

If a revised training element (or a revision to an associated procedure) constitutes a major system change, it shall be reviewed in accordance with the provisions in 3.6 Management of Change (MOC).

All employees must take mandatory incident management/ Incident Command System (ICS) training through the Federal Emergency Management Agency's (FEMA) online Emergency Management Institute, as follows:

- All employees must successfully pass IS-100 – Introduction to Incident Command System (Alternatively, the internal City-Assisted Evacuation Plan (CAEP) and IS-100 familiarization training is an acceptable substitute for this requirement.)
- Designated Incident Management Team positions must successfully pass:
    - IS-200 – Basic Incident Command System for Initial Response
    - IS-700 – An Introduction to the National Incident Management System
    - IS-800 – National Response Framework, An Introduction.

Other introductory safety, security, and emergency management presentations and workshops are available upon request and have been delivered to senior leadership team members and other groups by request. The Safety, Security, and Emergency Management Departments develop and adapt their 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
- Accident and incident trends
- Rule or procedure changes
- CAP management process
- How to assist the Safety Department with Safety Promotion efforts as outlined in this ASP section
- Emergency management roles and responsibilities under the All Hazards Plan
- System security policies and procedures
- Crisis awareness and de-escalation.

4.1.1 SMS Training Requirements

Separate and apart from the comprehensive training described above, certain SMS training is required for each of the following: Key SMS Personnel as designated in this Plan, all directors and above, and all active LMSC members, as described in greater detail in the next three subsections.

All employees in all departments are required to take basic SMS ~~a one-hour "SMS 101" course~~ training delivered by the Safety Department during new-hire orientation. Additionally, a computer-based training offering of "SMS 101" is under development and will be included in the mandatory trainings for all employees through the LMS portal.

All personnel with safety responsibilities who are not designated as Key SMS Personnel are encouraged, but not required, to obtain either the Transit Safety and Security Program (TSSP) certificate or PTSCTP certificate in either bus, rail, or both. They are welcome to pursue either of these certificates as part of their individual professional development plans. Employees who do so should send all certificates upon successful completion to the HR Department for recordkeeping.

RTA does not consider any contractors to be "key SMS personnel". Contractor employees are welcome to pursue and maintain PTSCTP and/or TSSP certification on their own in coordination with their respective RTA points of contact and/or project managers.

4.1.1.1 Key SMS Personnel Training Requirements

(Also see 1.4.3 Key SMS Personnel with Direct Responsibility for Rail Fixed Guideway Safety Oversight.)

Key SMS personnel are responsible for complying with PTSCTP and internal SMS training requirements, including refresher training every two years. Per 49 CFR Part 672.13(d) key SMS personnel must now complete two elements as part of their refresher training:

1. Specific recertification training defined by FTA, and
2. Recertification training defined by RTA, which must include, at a minimum, one (1) hour of safety oversight training.

The recertification training defined by FTA in (federal) FY 2025 is a TSI module entitled, "Advancing Safety Assurance Through Corrective Action Plans." All key SMS personnel have been notified of this new requirement.[25]

Key SMS personnel have received direction under a separate, internal memo on the recertification training defined by RTA, which includes a minimum of one (1) hour of safety oversight training as required by FTA.

Each person serving in a "Key SMS" position is solely responsible for applying for and maintaining their individual PTSCTP certification with FTA and for providing documentation to the HR Department for recordkeeping in the LMS.

4.1.1.2 Training Requirements for Directors and Above (Agency-Wide)

All directors and above in all departments must enroll in and complete TSI's "SMS Awareness" course within three (3) years of being hired or promoted into the position. The certificate must be provided to the HR Department for recordkeeping in the Neogov LMS.

Optionally, directors (who are not designated as Key SMS Personnel in this Plan) may obtain PTSCTP certification as a voluntary participant in the PTSCTP. There are no timeframes specified by FTA for completing the PTSCTP on a voluntary basis. Documentation from any classes taken pursuant to the PTSCTP certification must be sent to the HR Department for recordkeeping.

(Also see the "Director-level" requirements listed in 1.4.2.2 SMS Responsibilities for All Management and Staff.)

4.1.1.3 Training Requirements for Active LMSC Members

All active LMSC members must enroll in and complete TSI's "SMS Awareness" course within one (1) year of being appointed to serve as an LMSC member. The certificate must be provided to the HR Department for recordkeeping in the LMS. In the capacity of SMS Executive and POC for communication with FTA regarding PTSCTP matters, the CSSEM oversees the compliance of each LMSC member with this requirement.

(Also see *1.4.2.1 Safety Committee Requirements* Related to the SMS.)

4.2 Safety Communications

[25] https://www.transit.dot.gov/PTSCTP

Effective safety communication is one of the foundational components 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. All approved policies are shared on the RTA SharePoint Intranet and through ADP. All employees are required to review and “acknowledge” all company policies in ADP.

Methods of communicating safety information to RTA employees include face-to-face meetings and interactions, sending agency-wide emails, posting and/or distribution of bulletins, department notices, Driver/Safety Alerts, and memoranda, sending electronic messages via the Computer-Aided Dispatch (CAD) system “Clever Devices”, and through a quarterly Safety Department newsletter. Posted information can be found at a central location in each department easily accessible to employees. Note: Other efforts are currently in development stages such as the Safety Ambassador program which are intended to further support Safety Promotion and enhance two-way communication about safety initiatives and topics. Updates will be reflected in future versions of this Plan accordingly.

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;
- Periodic safety blitz or “stand-down” events;
- Quarterly safety meetings;
- Mandatory crisis awareness and de-escalation training for operations and maintenance personnel;
- Employee safety, security, and emergency management training programs delivered by the corresponding department under the direction of the CSSEM;
- SMS training and workshops hosted by the Safety Department by request;
- 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;
- Information on hazards and safety risk relevant to transit workers’ roles and responsibilities;
- Updates on any actions taken by RTA in response to reports submitted through

the ESRP;
- Annual worker right-to-know programs and industrial safety training; and
- Periodic insurance carrier/broker assessments.

4.2.1 Safety Committees

The SMSSC and the LMSC both play integral roles in promoting safety within the organization, fulfilling key elements of the SMS framework.

The SMSSC, led by executive leadership, drives the strategic promotion of safety by guiding SMS implementation across all departments. It oversees safety goals, coordinates and manages CAPs, and advises on policy updates, such as the RTA Safety Management Policy (SAF3). Through this, the committee ensures safety remains a top priority, fostering a strong safety culture aligned with the ASP and supporting agency safety performance objectives.

The LMSC plays a vital role in promoting safety by creating a collaborative platform for front-line employees and management to discuss and review the safety program. Together, they address safety concerns, review workplace conditions, and ensure compliance with both labor and safety regulations. Importantly, the LMSC complies with statutory requirements in Title 49 U.S.C. § 5329(d), as amended by the Bipartisan Infrastructure Law, specifically subsections (1)(A) and (5)(A). By incorporating equal input from represented and non-represented staff, the LMSC fosters shared ownership of safety and compliance across the organization.

Together, these committees ensure the promotion of a proactive, collaborative, and compliant safety culture as part of the organization's SMS.

~~Other safety-focused committees that generally meet on an as-needed basis are described further in SAF5.~~

Members in both safety committees, in consultation with the Safety Department, shall ensure the results of cooperation between front-line employees and management are properly communicated with the entire agency, as required in 49 CFR Part 673.29(b). The primary means of communication are posting and making available official meeting minutes, as discussed in further detail in SAF5 and related procedures. Note: The Safety Department is currently reviewing ways to enhance messaging and communication with front-line employees, including bulletin boards in all facilities and the SharePoint intranet site.

(Also see *1.4.2.1 Safety Committee Requirements* Related to the SMS.)

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 CSSEM or his/her designee prior to use or testing of the product in accordance with the SOP.

The end user must ensure that the CSSEM 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. Substitutes for chemical products and hazardous materials shall have prior CSSEM 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 CSSEM 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 (HC23) to ensure a safe environment for the public and RTA employees.

The Designated Employee Representative (DER; reports to the ~~CHRO~~CSSEM) 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. HC23 establishes procedures for the Drug and Alcohol Testing Program, which is administered by the DER, in close coordination with Operations, Maintenance, and ~~Safety~~Human Resources Departments. The appendix section of HC23 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: 2026~~5~~ SAFETY PERFORMANCE AND SAFETY RISK REDUCTION PROGRAM TARGETS

~~The updated SPTs and RRPTs are included in this appendix.~~ Safety Performance Targets are updated each calendar year based on actual safety and mechanical system failure data as reported by RTA. ~~to the NTD.~~ Safety and Security reporting for the previous three (3) years under NTD's Safety and Security Major and Non-Major criteria was accessed and reviewed in support of establishing all targets. All targets are established in accordance with FTA regulations and guidance except Preventability Rate Targets which are internally driven and not required by FTA. ~~Some are~~ Mileage-based targets rely on the last three years of Vehicle Revenue Miles (VRMs) for each mode reported to NTD. VRMs by mode are ~~, which are available in the NTD and~~ displayed here, for reference:

VRMs by Mode for Previous Three Years (As Available in NTD)			
	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
2022	5,747,849	780,415	1,037,001
2023	6,083,923	764,481	1,214,414
2024	5,603,314	805,047	1,091,274
3-Year Average	5,811,695	783,314	1,114,230

This appendix is divided into ~~two~~ three sections, one for each of the two required target-types~~--~~; SPTs ~~SPTs~~ and RRPTs, and a third for preventability rate targets by mode. The target calculation criterion from FTA's SPTs Guide v3, is provided with each target for reference.[26]

SPTs (Excluding Those That Overlap with RRPTs)

S4. Pedestrian Collision Rate - # of pedestrian collisions/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	0.0000002~~0.0000003~~	0.0000026~~0.0000059~~	0.0000000~~0.0000000~~

S5. Vehicular Collision Rate - # of vehicular collisions/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)

[26] https://www.transit.dot.gov/regulations-and-programs/safety/public-transportation-agency-safety-program/safety-performance

~~2025 Target~~2026 Target	0.00000360.0000065	0.00002470.0000299	0.00000390.0000059

S6. Fatalities - # of fatalities

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	0	0	0

S7. Fatality Rate - # of fatalities/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	0.0000001	0.0000000	0.0000000

S8. Transit Worker Fatality Rate - # of transit worker fatalities/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	0.0000000	0.0000000	0.0000000

S11. Transit Worker Injury Rate - # of transit worker injuries/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	0.00000080.0000029	0.00000130.0000029	0.00000090.0000021

S14. System Reliability – VRM/ # of major mechanical system failures (mean distance between major mechanical system failure)

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target (miles)	7,131 ~~7,125 miles~~	23,039 ~~29,200 miles~~	31,835 ~~51,508 miles~~

* Currently, there are seven (7) overlapping targets. The following SPTs overlap with RRPTs: **S1, S2, S3, S9, S10, S12,** and **S13**. Where any SPT is a duplicate of any RRPT, the RRPT takes precedence to avoid any conflict and to ensure compliance with FTA regulations.

RRPTs

Note: RRPTs are formally established by the LMSC as required in 49 CFR Part 673.19(d)(2). Official RRPTs are found in meeting minutes and other materials maintained exclusively by the LMSC. These materials are available on the RTA SharePoint, Safety Committees site. To the extent practicable they are included here, however, these are *for reference only*.

R1. Major Events - # of major safety and security events[27]

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	24~~28~~	67~~64~~	5~~4~~

R2. Major Event Rate - # of major safety and security events/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	0.00000420~~.0000048~~	0.00008550~~.0000858~~	0.00000480~~.0000042~~

R3. Collisions - # of collisions reported

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	23~~26~~	23~~19~~	5~~5~~

R4. Collision Rate - # of collisions/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	0.00000390~~.0000045~~	0.00002890~~.0000233~~	0.00000450~~.0000039~~

R5. Injuries - # of injuries as defined by the NTD reported

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	44~~48~~	11~~12~~	10~~10~~

[27] Whereas FTA previously directed transit agencies to omit security events from its targets related to "major events" pg. 14 of the NSP now states "all safety and security major events as defined by the NTD."

R6. Injury Rate - # of injuries as defined by NTD/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	0.00000760.0000084	0.00001400.0000160	0.00000870.0000094

R7. Assaults on Transit Workers* - # of assaults on transit workers as defined by NTD

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	N/A	N/A	N/A

R8. Rate of Assaults on Transit Workers* - # of assaults on transit workers as defined by NTD/VRM

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
~~2025 Target~~2026 Target	N/A	N/A	N/A

***** The RRPTs, "Assaults on Transit Workers" (#R7) and "Rate of Assaults on Transit Workers" (#R8) are not possible to set because the NTD has not yet collected three (3) years of data on "assaults" as defined by FTA.

~~Notes on Collision~~ Preventability Rate Targets By Mode

Mode	Fixed-Route Bus	Streetcar	Non-Fixed-Route Bus (Paratransit)
2026 Target	1.62	2.97	1.43

Determinations of ~~accident/incident~~ preventability have no bearing on any SPTs or RRPTs per FTA guidance.

~~As comparison, the current internal benchmarks for preventable collisions and other safety events for each mode are as follows:~~

- ~~Fixed-Route Bus – 2.3 per 100,000 vehicle revenue miles (VRM)~~
- ~~Streetcar – 1.5 per 100,000 VRM~~
- ~~Non-Fixed-Route Bus (Paratransit) – 2.3 per 100,000 VRM.~~

Note: A collision that is counted for internal benchmarks may not necessarily constitute a reportable collision in NTD.

General Notes

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.

Refer to page 12 of the NSP for descriptions of each SPM used in developing these targets.[28]

For the purpose of establishing targets, safety events involving non-revenue vehicles are not included as they are not generally reported to NTD. Safety events involving RTA maintenance employees operating revenue service vehicles *are* included for their respective mode as these are reported to NTD. Occupational injuries taking place in administrative or non-revenue facilities or otherwise not meeting an NTD reportable threshold are *not* included.

All measures related to assaults on transit workers, by definition, include both major and non-major events.

All rates are calculated using VRM for the corresponding mode as reported to NTD, unless otherwise noted.

Under previous FTA guidance, injuries were considered only those which are reported to NTD either as a major or non-major event but excluding assaults or other security events. Now, per page 14 of the NSP, RTA's interpretation of the requirement is that all injuries are included regardless of event type.[29]

For "Transit Worker Injury Rate" FTA has clarified in its guidance that this includes the categories "transit employee/contractor," "transit vehicle operator," and "other transit staff."[30]

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

[28] https://www.transit.dot.gov/regulations-and-programs/safety/national-public-transportation-safety-plan
[29] See FTA Safety Performance Targets Fact Sheet (https://www.transit.dot.gov/sites/fta.dot.gov/files/2020-08/SafetyPerformanceTargetFactSheet_20200814.pdf)

[30] See pg. 7 of the Safety Performance Targets Guide v3 (https://www.transit.dot.gov/regulations-and-programs/safety/public-transportation-agency-safety-program/safety-performance)

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.

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 – a type of safety event, typically a collision. Note: 49 CFR Part 673 no longer includes this term.

Accountable Executive – a single, identifiable person who has ultimate responsibility and accountability for the implementation and maintenance of the ASP; responsibility for carrying out the 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. [673]

Assault on a Transit Worker – as defined under 49 USC § 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker. [673]

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 transit agency, 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. Also see PTASP. [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.

CSFO -- Chief Strategic and Financial Officer of the Regional Transit Authority.

Chief Safety, Security, and Emergency Management Officer (CSSEM) – an adequately trained individual who has responsibility for safety and reports directly to an RTA chief executive officer, president, or equivalent officer. [673]

CM -- Construction Manager of the Regional Transit Authority.

CMC – Configuration Management Committee, a Subcommittee of the SMS Steering Committee

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.

CTO –Chief Transit Officer (formerly 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.
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 – Generally, a type of safety event. 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.
Investigation – the process of determining the causal and contributing factors of a safety event or hazard, for the purpose of preventing recurrence and mitigating safety risk. [673, 674]
Labor-Management Safety Committee (LMSC) – Established by SAF5, consists of a voting roster of 6 designated managers/directors and 6 representatives from the labor organization representing the plurality of the transit workforce at RTA, pursuant to 49 CFR Part 673 requirements.
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 narrowly avoided safety event. [673]
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
Potential Consequence – the effect of a hazard [673]
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.
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]
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]
Roadway – land on which rail transit tracks and support infrastructure have been constructed to support the movement of rail transit vehicles, excluding station platforms. [673]
ROW -- right-of-way. Also see Roadway.
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 (SSC) -- 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 (SA) – 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, 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 hazards and safety risk. [670, 673, 674]

SMS Executive -- a Safety Officer or equivalent. [SMS]
Safety Performance Target (SPT) – a quantifiable level of performance or condition, expressed as a value for the measure, related to safety management activities, to be achieved within a specified time period. [673]
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 composite of predicted severity and likelihood of the potential consequence(s) of a hazard. [673, SMS]
Safety Risk Management (SRM) – a process within RTA's SMS/Safety Plan for identifying hazards and analyzing, assessing, and mitigating the safety risk of their potential consequences. [673]
Safety Risk Mitigation -- the method or methods to eliminate or reduce the probability and/or severity of a potential consequence of a hazard. [673]
Security is defined as freedom from intentional danger for employees and passengers.
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 Steering Committee (SMSSC) – executive-level safety committee established by SAF5
SRM – Safety Risk Management (see above).
SSCP -- Safety and Security Certification 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. Contact the Safety Department or refer to the RTA Intranet site ~~to obtain copies or~~ for additional information.

ID	Title	Revision Date
004-100	Procedure for Performing Internal Safety Management Audits (ISMA)	11/09/2023
004-002	Agency Safety Plan Revision	10/07/2022
~~004-005~~SAF-SOP-002	~~Accident/Incident~~Safety Event Investigation ~~(revision in progress)~~	6/15/2020 (revision in progress)
004-006	Safety Assurance of Safety Critical Areas	10/20/2020
004-007	On-Call Safety Representative Procedures	10/5/2021
004-008	First Aid Cabinets	3/24/2022
004-009	Working in Hot Weather	3/24/2022
004-010	Management of Change Procedure	12/27/2023
004-011	Labor-Management Safety Committee SOP	12/13/2024
004-101	Right of Way Permit Procedure	10/03/2024
SAF-SOP-001	Safety Risk Management	10/31/2025
EM-SOP-001	Passenger Evacuation	02/06/2025
EM-SOP-002	Emergency Transportation	10/10/2025
HC23	RTA Drug and Alcohol Free Workplace Policy	12/14/2023
SAF2	RTA Distracted Driving Policy	2/23/2021
SAF3	RTA Safety Management Policy	6/28/2022
SAF4	RTA General Accident and Injury Policy	2/23/2021
SAF5	RTA Safety Committee Structure	1/23/2023
SAF6	RTA Personal Protective Equipment Policy	8/24/2021
SAF7	State of Emergency and Disaster Recovery	Pends
	Safety and Security Certification Plan	11/03/2023

	RTA All Hazards Plan	8/17/2022
	RTA Exercise Plan	10/28/2022
	RTA Employee Safety and Health Handbook	10/16/2023
	Roadway Worker Protection Manual	12/2/2025
	Streetcar Rulebook (revision in progress incorporating RWP requirements)	Pends

APPENDIX E: SMS IMPLEMENTATION PLAN

New Orleans Regional Transit Authority

Multi-Year Strategic Plan
for
Safety Management System Implementation

Updated: For 2026~~5~~ ASP

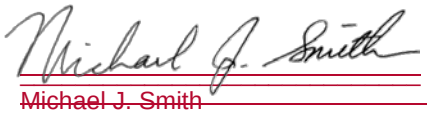
Policy Statement for Safety Management System Implementation

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 that are instrumental in implementing SMS and have been tracked since its adoption at RTA in 2020.

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, the Safety Department will leverage these reviews to ensure we are on the right path toward achieving a mature SMS.

~~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, Security, and Emergency Management Officer~~
~~SMS Executive~~

SMS Implementation Plan (~~Updated)~~For Complete Notes, Refer to SMSSC Meeting Materials)

Status Column Key: IP = In Progress; AC = Almost Complete; C = Complete

SIP ACTION ITEMS	Source	2025 Status	Dept. Responsible	Subtasks
Perform a document audit to establish all current documented procedures and identify gaps.	2020 SIP: SMS Documentation	IP	Safety	New Policies and SOPs are being updated and/or developed to account for in-house transition effective Dec. 2020, and to address identified gaps. Safety continues to participate in assessments and drafting of new policies, SOPs, and other documents.
	2020 SIP: SMS Documentation	C	Finance	New Director Internal Audit & Compliance is conducting an assessment and creating an SOP catalogue.
	2020 SIP: SMS Documentation	IP	Safety	Fully integrate SOP catalogue into annual ASP review and approval process, 1st year.
	2020 SIP: SMS Documentation	IP	Safety	Continue to integrate SOP catalogue into ongoing ASP review and approval cycle.
RTA Policy Manual (in development)	2020 SIP: SMS Documentation	C	HR	Complete Policy Manual.
	2020 SIP: SMS Documentation	C	HR	Establish employee intranet/ADP access and require sign-offs from employees.
	2020 SIP: SMS Documentation	C	Safety	Safety reviews Policies that were revised in preceding year, as part of annual ASP Review and Approval process.
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.	2020 SIP: SMS Documentation	C	Safety	Perform updated/revised Gap Assessment of safety-critical documentation, focusing on alignment with SMS objectives.
	2020 SIP: SMS Documentation	IP	Safety	Develop SMS rollout plan for gradually shifting primary ownership of departmental SRM and SA processes from Safety to Departments.
	2020 SIP: SMS Documentation	IP	Operations Maintenance	Tie departmental logs/risk registers to DSC discussion, and subsequently, to ESSC escalation if warranted based on risk.
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.	2020 SIP: SMS Documentation	C	Operations	Stand-up Operations Rulebook Committee with full support of all departments.
	2020 SIP: SMS Documentation	AC	Operations	Distribute final Operations Rulebook.
	2020 SIP: SMS Documentation	IP	Operations	Stand-up recurring (annual) review cycle for Operations Rulebook using Rulebook Committee approach.
	2020 SIP: SMS Documentation	C	Safety	Incorporate Rulebook and all Operations and Maintenance SOPs, policies, and handbooks into ISMA checklists and audits.
	2020 SIP: SMS Documentation	C	Safety	Incorporate Maintenance rules, policies, procedures and handbooks in ISMAs for Bus and Rail Maintenance.
	2020 SIP: SMS Documentation	IP	Operations Maintenance	Update/ develop new training and re-fresher training to account for new documentation.
	2020 SIP: SMS Documentation	C	SEP	Update SEPP and Hurricane Emergency Preparedness Plan
	2020 SIP: SMS Documentation	C	Safety	Incorporate review of SPTs in annual ASP review and update process.
	2020 SIP: SMS Documentation	C	Safety	Review and update the Safety Management Policy.
	2020 SIP: SMS Documentation	C	Safety	Review and update the SIP to be appended to the 2022 ASP.
Ensure that all customer concerns are captured from: public meetings; customer calls and electronic communications; and face-to-face interactions with RTA employees.	2020 SIP: SMS Documentation	C	Safety	Integrate Rideline IssueTrak and Vorex Help Desk logs into Safety Department Hazard Log.
	2020 SIP: SMS Documentation	C	Safety Operations	Discuss issues/complaints in Weekly coordination meetings.
	2020 SIP: SMS Documentation	C	Safety	Engage Planning and Scheduling in Quarterly review of recent hazards/concerns that may be associated with route or schedule.

SIP ACTION ITEMS	Source	2025 Status	Dept. Responsible	Subtasks
	2020 SIP: SMS Documentation	C	Safety	Review Board and RAC meeting minutes monthly for reported hazards and safety concerns; add to Hazard Log as appropriate.
Safety Department ensures this information is captured in logs/registers and elevates to ESSC or Executive-level management, as appropriate.	2020 SIP: SMS Documentation	C	Safety	Elevate consolidated Hazard Log items to ESSC based on assessment of risk, per ASP.
	2020 SIP: SMS Documentation	C	Safety	Include as checklist item during upcoming ISMA of Safety Department.
ESSC is re-established under a revised SOP/Charter to focus on SMS objectives.	2020 SIP: Safety Committee Structure	C	Safety	Monthly meetings are held and thorough report of agencywide accidents, incidents and occurrences is presented and discussed.
Establish a new hierarchy and reporting structure between the ESSC and Departmental Safety Committees (DSCs).	2020 SIP: Safety Committee Structure	C	Safety Operations Maintenance	Establish DSCs for: Bus & Rail Maintenance, Operations, and ENO.
	2020 SIP: Safety Committee Structure	C	Safety	Establish and finalize DSC Guidelines
	2020 SIP: Safety Committee Structure	AC	Safety	Establish Safety Department SOP for supporting/facilitating DSCs.
Educate the ESSC on the current Safety Management Policy Statement and their roles and responsibilities related to key safety objectives.	2020 SIP: Safety Committee Structure	C	Safety	Educate current ESSC members.
	2020 SIP: Safety Committee Structure	C	Safety	Provide technical assistance as necessary especially if ESSC roster changes significantly.
Incorporate safety objectives into meeting agenda.	2020 SIP: Safety Committee Structure	C	Safety	Incorporate safety objectives into ESSC meeting agenda.
Invite ATU Local 1560 to DSCs as appropriate.	2020 SIP: Safety Committee Structure	C	Safety	Invite ATU Local 1560 to DSCs.
Provide baseline SMS training to DSCs.	2020 SIP: Safety Committee Structure	IP	Safety	Provide baseline SMS 101 Training to DSCs.
Ensure that all departments appropriately elevate identified hazards and safety concerns to the ESSC's attention, in consultation with the Safety Department.	2020 SIP: Safety Committee Structure	AC	Safety	Promote elevation of hazards through DSCs
	2020 SIP: Safety Committee Structure	C	Safety	Promote elevation of hazards through recurring SMS 101 and other types of training.
Ensure DSCs use effective two-way communication related to hazards, safety concerns, and safety programs, and encourage participation in departmental SRM and SA processes.	2020 SIP: Safety Committee Structure	IP	Safety	Establish consistent, formal communication from Safety Department to DSCs relative to ESRP status, agency-wide, which hazards have been escalated to ESSC, and their status.
Task the Safety Department with providing technical assistance to DSCs as necessary to ensure effectiveness.	2020 SIP: Safety Committee Structure	C	Safety	Ensure Safety representatives provide continuous technical support to DSCs.
Establish Management of Change process including roles and responsibilities for all departments and elevation to the ESSC as necessary.	2020 SIP: Safety Assurance	C	Safety	
Finalize and document in the M of C process, all major changes that must be assessed through SRM:...	2020 SIP: Safety Assurance	C	Safety	Include in M of C organizational policy, the exact types of major changes that must be assess through SRM, in accordance with FTA and the ASP.
Prepare a document map to ensure that all changes in the organization are reflected in all critical documentation.	2020 SIP: Safety Assurance	C	Safety Finance	Prepare document map.
Develop and implement training on the new A/I Investigation procedure as appropriate.	2020 SIP: Safety Assurance	AC	Safety Operations	Develop new A/I SOP

SIP ACTION ITEMS	Source	2025 Status	Dept. Responsible	Subtasks
	2020 SIP: Safety Assurance	AC	Safety	Develop cheat sheet or other job aides to assist supervisors with conducting thorough and uniform investigations.
	2020 SIP: Safety Assurance	IP	Safety IT Operations	Finalize Clever Incident Management module integration for all modes and all user groups.
	2020 SIP: Safety Assurance	IP	Safety Training	Continue to implement and revise, as necessary, new training on A/I SOP and report writing.
Establish process whereby Safety Department leads SA activities and concerns are elevated to the ESSC as necessary.	2020 SIP: Safety Assurance	C	Safety	Continue to follow SOP for SA of Safety-Critical Areas. Follow DSC Guidelines and Safety Committee Policy for escalating hazards and concerns to the ESSC as necessary.
Distribute SA findings through the Safety Committees and other means.	2020 SIP: Safety Assurance	C	Safety	Incorporate SA findings into ESSC.
	2020 SIP: Safety Assurance	C	Safety	Incorporate SA findings into DSC meetings.
	2020 SIP: Safety Assurance	C	Operations Training	Re-introduce operator trail checks and annual evaluations, formerly performed by instructors and supervisors.
Ensure that all corrective actions for ineffective mitigations identified through the SA process are fully documented.	2020 SIP: Safety Assurance	C	Safety	Provide link to CAP process in SA for Safety-Critical Areas SOP.
	2020 SIP: Safety Assurance	C	Safety	Include in next ISMAs to ensure SA corrective actions are documented appropriately.
Implement the program as described in the ASP. Provide regular updates to the Executive-level management and the ESSC.	2020 SIP: Employee Safety Reporting	C	Safety	Lead and facilitate ESRP process in accordance with ASP.
	2020 SIP: Employee Safety Reporting	C	Safety	Report out process in ESSC meetings.
Revise and finalize an official hazard-/unsafe behavior-reporting form.	2020 SIP: Employee Safety Reporting	C	Safety	Safety hazard reporting form
	2020 SIP: Employee Safety Reporting	C	Safety	Disseminate form to departments and provide technical assistance as necessary.
Re-establish a safety hotline (pending staffing plan and transition to in-house O&M responsibilities). Set up email "hotline" option in the interim.	2020 SIP: Employee Safety Reporting	C	Safety	Re-establish safety hotline and email "hotline" option.
Establish Safety Department protocols for managing the safety hotline.	2020 SIP: Employee Safety Reporting	C	Safety	Establish and implement Safety Department protocols for managing the safety hotline.
When ready to launch, initiate robust training on the employee safety reporting program.	2020 SIP: Employee Safety Reporting	C	Safety	Launch SMS 101 training that includes an ESRP component.
Develop a centralized system where all hazards and safety concerns can be placed for Safety Department analysis and to aid communication efforts.	2020 SIP: Employee Safety Reporting	C	Safety	Launch Vorex Helpdesk application and run regular reports to assess whether ESRP is meeting objectives.
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.	2020 SIP: Communication of Safety Info.	C	Safety	Logs are separated into internal and external responsibilities and addressed accordingly.
	2020 SIP: Communication of Safety Info.	C	Safety	Employees to continue to report any hazards and potential hazards while working in the field or at any facility.
	2020 SIP: Communication of Safety Info.	C	Safety	Present ESRP status update at least once annually through ESSC.
Centralize management of training; use a matrix for monitoring compliance with program requirements.	2020 SIP: Training	C	HR	Centralize management of training.
Develop Training Plan (to be maintained by the CSO and provided to SSO/FTA by request).	2020 SIP: Training	C	Safety	Develop PTSCTP Training Plan for Key SMS Personnel in accordance with ASP and FTA requirements.
Establish 3-year plan for engaging external training providers, including TSI, NSC, and others.	2020 SIP: Training	AC	Safety Operations	Establish 3-year plan for engaging external training providers.
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.	2020 SIP: Training	IP	Safety HR	Add Safety review process to the management of agency-wide training in Neogov or other centralized database.
The training policy needs to include specific requirements and monitoring activities for contractor safety training. (Note: the original emphasis of this SIP item was to ensure the compliance of O&M	2020 SIP: Training	C	Safety	Incorporate training requirements into Safety's review of upcoming contracts, focusing on long-term contracts (e.g. Security) and capital projects.

SIP ACTION ITEMS	Source	2025 Status	Dept. Responsible	Subtasks
contractor staff designated as having key SMS responsibilities. To the extent that all O&M functions are in-house, this item has been removed from the SIP, it no longer applies.)				
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.	2020 SIP: Training	C	Safety	Establish biennial refresher training requirements in accordance with 49 CFR Part 672.
Participate in ferry operator-led safety meetings; hold joint meetings	2020 SIP: Miscellaneous	C	Safety Marine	Participate in ferry operator-led meetings; Invite ferry operator to ESSC meetings.
Drug & Alcohol Program is in development and will be aligned with organizational structure changes, effective October 1, 2020.	2020 SIP: Miscellaneous	C	Safety	Revamp Drug & Alcohol Program
Ensure that exercises (e.g., full-scale, tabletop) are held annually, both internally and with external agencies.	2020 SIP: Miscellaneous	C	Safety SEP	Establish an annual emergency exercise program, including annual drills and exercises both internally and with external agencies.
RTA should consider developing a daily train operator clearance that contains system conditions inclusive of defects, restrictions and advisories.	2021 APTA Peer Review	IP	Operations (0-2)	RTA should consider developing a daily train operator clearance that contains system conditions inclusive of defects, restrictions and advisories.
RTA should consider elevating the authority of at least one person now identified as a "dispatcher" to the position of [rail] "controller" • A controller would be considered in charge of the entire rail/streetcar system and would know what's going on along the entire rail line at all times, including if there's any work being conducted on the right-of-way and if there's an accident/incident (to relay back to all operators along those lines).	2021 APTA Peer Review	IP	Operations (0-3)	RTA should consider elevating the authority of at least one person now identified as a "dispatcher" to the position of [rail] "controller" • A controller would be considered in charge of the entire rail/streetcar system and would know what's going on along the entire rail line at all times, including if there's any work being conducted on the right-of-way and if there's an accident/incident (to relay back to all operators along those lines).
The panel recommends that there be clear lines of roles and responsibilities in the OCC. A standard operating procedure may need to be developed on this. In addition, the panel recommends that rail and bus oversight responsibilities be separated in the OCC (i.e., have bus dispatchers and rail controllers in the OCC).	2021 APTA Peer Review	IP	Operations (0-4)	The panel recommends that there be clear lines of roles and responsibilities in the OCC. A standard operating procedure may need to be developed on this. In addition, the panel recommends that rail and bus oversight responsibilities be separated in the OCC (i.e., have bus dispatchers and rail controllers in the OCC).
RTA should consider developing a formalized training program for rail controllers. Formalized training should include at a minimum Rail Rulebook, SOPs, red tag procedures and RWP. APTA standard RT-OP-S-005-03, Rev. 3, "Operations Control Centers," should be used to develop the framework. Also, RTA may want to include outside contractors in the development of the red tag procedures (as they are involved). An example of this would be the city repairing lights along the ROW.	2021 APTA Peer Review	IP	Operations (0-5)	RTA should consider developing a formalized training program for rail controllers. Formalized training should include at a minimum Rail Rulebook, SOPs, red tag procedures and RWP. APTA standard RT-OP-S-005-03, Rev. 3, "Operations Control Centers," should be used to develop the framework. Also, RTA may want to include outside contractors in the development of the red tag procedures (as they are involved). An example of this would be the city repairing lights along the ROW.
The panel recommends that RTA consider formal training for all dispatchers/controllers. This could be done in-house or by a third-party vendor.	2021 APTA Peer Review	IP	Operations (0-8)	The panel recommends that RTA consider formal training for all dispatchers/controllers. This could be done in-house or by a third-party vendor.
The panel also recommends that RTA consider updating its radio system to be more reliable and for better communication. • The panel recommends that RTA investigate the issue with the radios, speak with other transit agencies and review APTA standards on radios (in order to potentially upgrade the system).	2021 APTA Peer Review	IP	Operations (0-9)	The panel also recommends that RTA consider updating its radio system to be more reliable and for better communication. • The panel recommends that RTA investigate the issue with the radios, speak with other transit agencies and review APTA standards on radios (in order to potentially upgrade the system).
RTA should consider using identifying markers or signage for entry and exit points (examples include paddles, disks, etc.), and these should be identified in a rulebook and in RTA's overall RWP program.	2021 APTA Peer Review	IP	Rail Maintenance (M-2)	RTA should consider using identifying markers or signage for entry and exit points (examples include paddles, disks, etc.), and these should be identified in a rulebook and in RTA's overall RWP program.
The panel recommends that RTA consider developing a right-of-way safety training (and documentation) for external stakeholders/contractors. This right-of-way training for external stakeholders/contractors could be done in-house at RTA or through a third-party company.	2021 APTA Peer Review	IP	Safety (S-8)	The panel recommends that RTA consider developing a right-of-way safety training (and documentation) for external stakeholders/contractors. This right-of-way training for external stakeholders/contractors could be done in-house at RTA or through a third-party company.

APPENDIX F: RBI PROCEDURES MANUAL

New Orleans Regional Transit Authority Risk-Based Inspection Procedures Manual

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Acronyms

BIL	Bipartisan Infrastructure Law
CAP	Corrective Action Plan
CFR	Code of Federal Regulations
DOTD	Louisiana Department of Transportation and Development
FTA	Federal Transit Administration
IIJA	Infrastructure and Investment Jobs Act
LAC	Louisiana Administrative Code
NORTA	New Orleans Regional Transit Authority
RBI	Risk-Based Inspection
RFGPTS	Rail Fixed Guideway Public Transportation System
RTA	Rail Transit Agency
SOP	Standard Operating Procedure
SSO	State Safety Oversight
SSOA	State Safety Oversight Agency
SSOPS	State Safety Oversight Program Standard
TTP	Technical Training Program
USC	United States Code
WLA	Workload Assessment

1. Introduction

This document provides risk-based inspection procedures specific to the New Orleans Regional Transit Authority (NORTA), the RTA subject to the Louisiana Department of Transportation and Development (DOTD) State Safety Oversight program. The DOTD SSO and NORTA risk-based inspection procedures were developed in collaboration between DOTD and RTA staff. Collaboration included onsite meetings, conference calls, and emails between DOTD and NORTA staff. The following procedures will be reviewed and updated annually using the collaborative process defined within the Program Standard and the PTASP.

The SSO's risk-based inspections do not replace NORTA's other regularly scheduled inspections of infrastructure, equipment, records, personnel, and data.

1.1 NORTA Streetcar System Overview

NORTA currently operates historic streetcar vehicles across 39 track miles on four lines: Canal-Cemeteries, Canal-City Park, Riverfront, and St. Charles. The Rampart/St. Claude line is slated to re-open in spring 2024 after incurring extensive damage to its infrastructure during the 2019 Hard Rock Hotel collapse.

The St. Charles line is the oldest continuously operating streetcar railway in the world. The current fleet of streetcars associated with the St. Charles line are 100 years old, going back to the last significant upgrade of rolling stock in the 1920s. The line, its unique green streetcars, and its main maintenance and storage facility are on the National Register of Historic Places. The other lines operating in the city are the result of a general capital projects plan to return streetcar service to several former lines or to supplement highly trafficked bus corridors since the late 1990s and early 2000s.

As of 2022, the system contained a fleet of 21 streetcars operated in maximum service and two facilities: the Carrollton Transit Station and Streetcar Maintenance Barn located in Uptown New Orleans on the 8200 block of Willow Street, and the Canal Street Streetcar (SIS) facility, located behind the A. Randolph Operations Center on the 2800 block of Canal Street.

The streetcars are electric-powered and run on an overhead catenary system that propels vehicles forward. The streetcars operate at-grade and frequently in mixed traffic, though most track proceeds down median or "neutral ground" right-of-way. All intersections are unprotected grade crossings, and rail operators manually control the streetcars using line-of-sight.

1.2 FTA Special Directive 22-32

On October 21, 2022, FTA issued Special Directive 22-32, under authority of 49 U.S.C. § 5329 (k) and 49 CFR Part 670, requiring DOTD, as the Louisiana SSOA, to develop and implement a risk-based inspection program. According to the Special Directive, a risk-based inspection program uses qualitative and quantitative data analysis to inform ongoing inspection activities. Risk-based inspection programs are designed to prioritize inspections to address safety concerns and hazards associated with the highest levels of safety risk.

As described in 49 U.S.C. § 5329(k), the State Safety Oversight Agency (SSOA) must develop policies and procedures for inspection access and data collection in consultation with each rail transit agency (RTA) that the SSOA oversees. The policies and procedures must address SSOA authority and capability to enter and conduct inspections of the rail fixed guideway public transportation system (RFGPTS),

including access for inspections that occur with and without advance notice. Additionally, the policies and procedures must address how the SSOA will collect data from each RTA to support its risk-based inspection monitoring and prioritization activities, including data that the RTA collects when identifying and evaluating safety risk. The risk-based inspection program must be implemented in a way that is commensurate with the size and complexity of each RTA that the DOTD SSOA oversees.

As the only RFGPTS in Louisiana, NORTA created this RBI Procedures Manual in collaboration with DOTD, which is included as an appendix to its Agency Safety Plan. It includes procedures specific to the agency and access to its facilities, announced and unannounced inspections, data collection and sharing, communications, and other interactions with the SSO for RBI processes.

2. RTA Access and Inspection Procedures

The section outlines NORTA's procedures for providing safe and secure access to DOTD SSO Program staff and contractors to all agency infrastructure, equipment, records, personnel, and data for the purposes of risk-based inspection, as is required by 49 U.S.C. § 5329(k)(1)(B) and 49 U.S.C. § 5329(k)(3).

2.1 Communication Before Inspections

DOTD SSO Program staff, including support contractors, will conduct a minimum of four inspections each year at NORTA. In general, two of the inspections will be scheduled and conducted with notice as outlined below, and two inspections will be conducted without advanced notice. For each announced inspection, DOTD will initiate communication around upcoming risk-based inspections through an email to NORTA's Chief Safety, Security & Emergency Management Officer (CSSEM). For each unannounced inspection, DOTD will call NORTA's CSSEM upon arrival.

2.1.1 Inspections <u>with</u> Notice

Announced inspections are scheduled in advance, and the timeline for this advanced notice is based on the SSOA's risk-based inspection prioritization procedures. When scheduling an announced inspection, DOTD's SSO Program Manager emails NORTA's CSSEM or other designated RTA personnel with an agenda or itinerary of what functional areas and locations will be included in the inspections. This will ensure that appropriate RTA personnel are available to escort SSOA personnel into non-public areas of operation. In addition to identifying the equipment and infrastructure that will be inspected, this advanced communication will also confirm practices to be observed and records or other documents to be reviewed. The RTA CSSEM or other appropriate RTA personnel are responsible for preparing opportunities to observe requested practices and review requested records.

2.1.2 Inspections <u>without</u> Notice

Unannounced inspections will be conducted throughout the year. The DOTD SSOA has the authority and capability to conduct inspections without notice, and these inspections can occur at any time deemed necessary based on the SSOA's review of risk-based inspection data. An unannounced inspection is one in which the SSOA notifies the RTA when inspectors arrive onsite for inspection.

Upon arrival, DOTD's SSO Program Manager will call the RTA's CSSEM or other designated personnel of the intent to conduct an unannounced inspection. This call will include the inspection's purpose, locations, and RTA staff requested to attend. NORTA's CSSEM will confirm the details and call facility specific contacts for escort. These designated contacts must meet inspectors within two hours of arrival.

2.2 Access to RTA Properties

2.2.1 Publicly Accessible Areas

DOTD staff and contractors may conduct inspections of publicly accessible areas without notice to the RTA. At its discretion, DOTD may provide notice to the RTA of inspections of publicly accessible areas. DOTD may request an RTA escort during inspections of publicly accessible areas.

2.2.2 Access Procedures and Escorts for Non-Publicly Accessible Areas

DOTD SSO staff will not enter publicly inaccessible areas without an RTA escort. SSO staff, including support contractors, will inform the RTA CSSEM when staff are onsite and are inspecting non-publicly accessible areas. When arriving at RTA's property, DOTD staff will gather at a safe location, such as a main entrance or reception area, and await an RTA escort.

RTA staff serve as escorts and will accompany DOTD SSO staff during inspections of publicly inaccessible areas. The CSSEM will identify the escort for inspection at each facility, as there are safety personnel available at each. RTA staff must meet inspectors within 2 hours of their arrival.

NORTA has provided security badges to SSO staff and contract support for access to secure areas. If needed, the SSO has the ability to access secure areas without escort, but in doing so it assumes the risks and liabilities associated.

2.2.3 Inspection Safety Certification and Training

The DOTD SSOA will comply with all safety procedures established by both DOTD and NORTA for conducting inspections at RTA properties. The SSOA will ensure that all personnel leading inspections have been trained and certified according to 49 CFR Part 672, PTSCTP, TSSP, and RTA specification to safely access RTA properties and alignments, and all inspector certifications and trainings are documented in the SSO's Technical Training Plan.

The RTA has input on core competency trainings which are required before SSOA staff and contractors may conduct inspections in designated areas. During the SSO and NORTA's Monthly Safety Coordination Meetings, a standing risk-based inspection agenda item serves as the opportunity to discuss and update agency-specific training requirements. Outside of this monthly meeting, NORTA's safety team will provide information on upcoming trainings to the SSO as soon as they have been finalized, providing as much advanced notice as is feasible so SSO can determine whether program staff or contractors need to attend.

2.3 Inspection Practices

2.3.1 DOTD Inspection Reports

At the conclusion of each inspection, a verbal summary of the inspection results will be conveyed to the RTA CSSEM or other appropriate RTA personnel. Within 30 calendar days of the inspection, DOTD's SSO Program Manager SSOA DOTD will send a formal report to the RTA for comment and consideration. The RTA will have 10 calendar days to respond, and a final report will be issued within 10 calendar days of either nonresponse or a response by the RTA.

At a minimum, the report will include the functional area or location that was the subject of the inspection, a brief description of any issues noted, and any possible deficiencies or possible remedial actions the RTA should consider. All reports will use objective language and reference objective data,

including measurements and photographs where possible to document issues noted during the inspection.

2.3.2 Immediate Safety Concerns

An immediate safety concern is one that could cause substantial risk of death or injury to riders, employees, or significant impacts to infrastructure. If at any time during an inspection an immediate safety concern is identified by the SSOA inspectors, their first priority will be to ensure their own safety and the safety of others present.

In any instance where inspections identify an immediate safety concern, inspectors will notify NORTA's CSSEM or a designee and follow the safety protocols in NORTA's Accident/Incident Investigation SOP. NORTA's safety escort will also contact dispatch if necessary. Depending on the circumstances, inspectors may also need to notify law enforcement personnel. The SSOA's Lead Inspector will work with RTA staff to ensure personnel are in a safe location and to reassess the safety of the inspection team. If the inspection cannot safely continue, then DOTD or the RTA may immediately cancel the inspection. Cancelled inspections for safety concerns will be documented within the inspection report. DOTD may consider the inspection complete or may re-schedule the inspection at a future date.

If the inspection can safely continue, then the inspection team will document and photograph the safety concern observed and discuss the issue with the SSOA and RTA present. At the conclusion of the inspection, the SSOA will email the RTA's CSSEM and other designated staff within 24 hours to explain the immediate safety concern observed. Depending on the nature of the safety concern, RTA personnel will have 10 calendar days to address the concern with either the development of a corrective action plan (CAP) or other mitigation measures as necessary to address the identified concern. Mitigation measures must be submitted to the SSOA within the 10-day period.

If the concern requires immediate mitigation, the RTA will follow up with their mitigation measures in writing within 10 calendar days of notification. NORTA will manage immediate safety concerns in compliance with its ASP prescribed safety risk management processes and in alignment with the DOTD SSO Program Standard.

2.3.3 Inspections of Equipment, Infrastructure, & Practices Specific to Each RTA

The DOTD SSOA will conduct inspections on the various procedures used to maintain RTA equipment, infrastructure, and practices of each RTA throughout the course of an audit cycle. The areas and locations for inspection will be determined through the RBI prioritization process. The various inspection types will also be contingent upon the size and complexity of the RTA. At NORTA, inspections will include but are not limited to the following:

Equipment

- Streetcars
- Maintenance equipment
- Communications equipment
- Security equipment
- Ticketing and fare collection equipment
- Software

Infrastructure[31]

- Fixed guideway tracks and switches
- Electric power supply: overhead catenary system, substations
- Streetcar maintenance facilities
- Signals and signage
- Stops/stations
- Right-of-way

Practices

- Trainings
- Operations SOPs
- Maintenance SOPs
- Emergency procedures
- Safety plans and SMS practices
- Procurement

As NORTA's Streetcar system changes over time, this list will change as well.

2.3.4 Event Verification

The DOTD SSOA reviews and eventually adopts all accident and incident reports. Included in that process will be an investigation of successful event scene repair by the RTA; verification that other similar parts of the operation, facilities, or track locations are investigated to determine if like conditions could result in similar incidents; and evaluation of whether the RTA is conducting investigations into similar scenes throughout their operations. If an event occurs, NORTA will follow its Streetcar Accident/Incident Investigation SOP and reporting practices as described in Section 3.5.1 of its Agency Safety Plan.

2.3.5 Ongoing Monitoring

As part of the RBI process, the DOTD SSOA will monitor not only the physical aspects of RTA facilities and equipment, but also the conduct and performance of personnel involved in day-to-day operations. The RBI process will analyze data to generate a prioritized list of operational aspects that should be monitored to ensure conformance with RTA procedures and processes. This will include monitoring operations centers, maintenance facilities, and training activities. During the SSOA's risk-based inspections, agency personnel will be observed according to DOTD's RBI Procedures Manual. To support these observations, the CSSEM or other designated RTA staff will ensure access to operations, maintenance, and training facilities and activities in accordance with the Access to RTA Properties section outlined above.

2.3.6 Defects and Corrective or Remedial Actions

The DOTD SSOA has an effective CAP tracking mechanism that ensures timely safety concerns are effectively mitigated. NORTA coordinates with DOTD on the management of hazards that meet or exceed the reporting threshold established by the RTA. The RTA uses a secure online spreadsheet shared with the SSOA to report hazards, document hazard related corrective actions, and keep DOTD informed on the status of open hazards. Within 24 hours of the occurrence or discovery of a hazard

[31] In many cases, signals, signage, and right-of-way are owned and maintained by the City of New Orleans. If the need arises for inspecting infrastructure that is city controlled, SSO staff and contractors will follow NORTA's protocols for coordinating with City agencies.

meeting the reportable threshold, the RTA must notify DOTD of the hazard using the shared spreadsheet and by email.

As hazards are input into the shared spreadsheet, they are added to the document's hazard log. The log includes the date the hazard was discovered, the location and description of the hazard, an initial risk assessment including probability and severity, the responsible RTA department(s) or employee(s) tasked with resolving the hazard, and the status of the hazard resolution.

DOTD requires NORTA to submit a consolidated hazard log for all open hazards quarterly. DOTD will complete a review of the hazard log within 15 calendar days of receipt, with results of the review provided to the RTA's CSSEM. DOTD's hazard log review will focus on communication on RTA's internal hazards, and coordination as each RTA implements their safety risk management processes. DOTD may require a corrective action plan (CAP) if the hazard log review indicates non-compliance with hazard management requirements.

2.3.7 CAP and Safety Risk Mitigation Verification

Hazards identified for mitigation reported to DOTD will be evaluated to determine needs for CAP creation. The shared spreadsheet will be used by NORTA to submit CAPs for DOTD review and approval, to request CAP closure, and to keep DOTD informed on the status of open CAPs. The shared spreadsheet allows DOTD to monitor and track the status of open CAPs in real time.

NORTA must request DOTD close a CAP once identified actions have been fully implemented. DOTD will verify that the CAP has been implemented in compliance with the approved plan by reviewing evidence provided either as a description of actions taken, an attached document, or uploaded pictures. Documentation may include the following: construction records, safety committee reports, standard operating procedures; training plans; training records, rule books, and bulletins; hazard management plan; maintenance procedures; emergency response plans and agreements; rules compliance programs; or independent assessment. DOTD may also use site visits, RTA interviews, and documentation review to verify CAP implementation. DOTD closes the CAP after verifying its implementation.

3. RBI Data Sharing and Collection

3.1 RTA Data Sharing

Per 49 U.S.C. § 5329(k)(2)(A), § 5329(k)(2)(B), and § 5329(k)(4)(B), DOTD SSO Program staff, including support contractors, will require safety, inspection, and maintenance data elements be submitted from NORTA quarterly as part of the RBI process, with the exception of capital projects and financial data submitted annually. The SSOA can increase this frequency if necessary to evaluate systemwide safety risk. The purpose of this ask is to substantiate conditions and conduct analyses of conditions, remedies, and remediations. In general, all data sets requested are to be compliant with standard FTA guidelines for data reporting and assembly. Transmittal and storage of said data is likewise governed by internal policy of NORTA and DOTD for the privacy of information (as applicable), as well as standard assurances that files as created and shared meet requirements for virus-protection and corruption.

Requests for the data described below will be provided quarterly in writing (via email) with a specific list of data elements to be provided for the context of compliance with the program objectives. The RTA will be provided with a set of instructions for data gathering and uploading, including information regarding the timeline for data provision, as well as the location for posting data for DOTD and contractor access.

Updates to the data elements may be outlined as well for RTA compliance, and instructions will specify the frequency or cause for updates. The timing and need for such updates will be part of ongoing communication between DOTD and the RTA, along with review of any obstacles to data sharing and data assembly preventing the timely transference of information.

3.1.1 Safety Program Data

DOTD SSOA requests for data will include safety program data to document safety-related elements and reports made on behalf of the RTA and all RTA used/managed facilities. Data records include but are not limited to records of events, hazard records, safety risk mitigation records, corrective action plans, and records of near misses.

- **Event records** will include data on event type, location, time of day, injuries, and substantial damage.
- **Hazard records** will include data on the source, location, recommended controlling measures, assigned ownership, and resolution implementation, as well as the original data collected by the RTA when identifying hazards.
- **Safety risk mitigation risk records** will include data on before and after risk ratings, timeframes for evaluation and re-evaluation after mitigation, and hazards with mitigations that have ongoing monitoring. This includes the original data collected by the RTA used to assess and mitigate safety risk.
- **Data on corrective action plans** will include departments responsible, due dates, open and closed status related to on-schedule completion, and reasons for extensions.
- **Records of near misses** will include data on type, location, and time of day.

3.1.2 Maintenance Data

The DOTD SSOA requests for data will include information on maintenance and maintenance activities made or developed by or on behalf of the RTA and at all RTA used/managed facilities. Data records include but are not limited to inspection and maintenance records and report forms, work orders, records of failures and defects, records of revenue vehicles out of service, major maintenance activity schedule and progress, and adherence to maintenance schedules.

- **Maintenance records** will include those from all components of the system, including vehicles, facilities, infrastructure, and equipment used by the rail system.
- **Work orders** data will include submission and completion dates, as well as reason for deferral, if applicable. Records of failures and defects data will include the type by vehicle or equipment and the resulting days out of service, if applicable.
- **Data on revenue vehicles out of service** will include causal information and resulting days out of service. Information regarding major maintenance activity, progress, and adherence to schedules will include data on maintenance performed as scheduled, unscheduled, and/or deferred, as well as vehicle mileage or equipment age when maintenance was performed.

3.1.3 Inspection Data

The DOTD SSOA requests for data will include information on inspections and reviews completed by staff working at or on behalf of RTAs at all RTA used/managed facilities. Data records include but are not limited to inspection records and report forms, records of failures and defects, records of speed restrictions, incident and safety risk mitigation verification, adherence to inspection schedules, capital project schedules and progress, and financial data.

- **Inspection records** will include those from all components of the system, including vehicles, facilities, infrastructure, and equipment used by the rail system.
- **Records of speed restrictions** will include data on location and cause. Incident and safety risk mitigation verification data will include information on hazards that have ongoing monitoring following mitigation.
- **Data on adherence to inspection schedules** will include records of inspections performed relative to scheduled inspections for vehicle, infrastructure, and equipment components, including documentation of inspections not performed or deferred.

3.1.4 Capital Projects and Financial Data

For capital project schedules and progress as well as financial data, the SSOA will request annual rather than quarterly reports, which will provide sufficient frequency for risk-based inspection.

- **Capital project reports** will include data for evaluating projects based on on-time and on-budget status, as well as updates on budget and schedule for the following fiscal year.
- **Annual financial reports** will include data on expenses by task, which will support SSOA analysis of alignment between risk and spending.

3.1.5 Additional Safety Data (as identified)

SSOA requests for data may include items not identified as part of the previous three categories but identified as critical to completion of the RBI process. Data records include but are not limited to audits, NTD reporting elements, security data, and more. NORTA will share these records following the same procedures described above.

3.2 Data Management Policy

All data sharing by NORTA for the RBI program will be to a compliant server hosted by NORTA using the agency's established IT protocols to assure data quality and integrity. Current DOTD SSO Program procedures for data organization and storage, as outlined and agreed to with the RTA, will define procedures for the following, as dictated by the specific data set (accidents, hazards, CAPs, ISR, Triennial, inspections, data reporting, etc.) and data elements.

3.2.1 How data sets will be stored and used for analysis

NORTA will host data on its internal SharePoint system. As a secure, cloud-based platform, it provides remote access to relevant folders and files granted to designated DOTD, contractor, and RTA safety staff. The SSOA and its contractors will use the data submitted for inspection prioritization purposes as described in Category 4 of the SSO's Program Standard.

3.2.2 Where the data sets will be stored

NORTA will upload data to folders on its cloud-based platform specific to the type of data being shared. The SSOA will upload items such as prioritization analysis, inspection agendas, and inspection reports into folders on the same platform. RBI data within these folders will be viewable by DOTD, contractors, and RTA staff granted access.

For data storage, the RTA has fundamental operational technology security requirements, including that all external data is stored on systems that are protected from general access. For data stored or backed up in a commercial data center, for example, they must be physically isolated from other customers' servers and systems.

Data housed on contractor/consultant web-based platforms will follow procedures to ensure that data integrity is maintained and secure.

3.2.3 How the data will be organized
RBI data is organized by year and quarter. Data is further organized by data type including safety, maintenance, inspection, and other safety data. Other data such as prioritization analysis, inspection agendas, and inspection reports will be associated by year and by quarter.

3.2.4 How long records must be retained
DOTD must retain RBI data shared by NORTA for 3 years in accordance with 49 CFR Part 674. Training records must be retained for 5 years in accordance with 49 CFR Part 672.

3.2.5 How and when records are disposed
RBI data must be retained for 3 years in accordance with 49 CFR Part 674, and training records must be retained for 5 years in accordance with 49 CFR Part 672. Records housed by SSOA servers are disposed of by SSO Program Staff and/or contractors in accordance with DOTD records retention and disposition polices. RTA Records disposal will follow RTA data deletion policies and procedures.

3.2.6 How the SSOA will ensure the system is maintained
DOTD staff will maintain folders and files shared with RTA. The SSO Program Manager assures the system is maintained through supervision of contractors. If necessary, DOTD will coordinate with the RTA to seek system maintenance assistance from the RTA's Information Technology Department when necessary, and the RTA can also seek assistance from the vendor of the cloud-based platform if needed.

In addition, the RTA employs a daily, automated backup system for all files stored on its SharePoint cloud-based servers and local servers. If any issues arise with original file versions, backups can be retrieved from this agency-wide backup with support from the RTA's IT department.

Separately, RBI folders on the RTA's SharePoint platform will require two-step authentication for approved users, and log in attempts must come from U.S. based IP addresses.

3.2.7 How the SSOA will ensure the system accurately stores records
The data stored in the cloud-based platform, including data sets, risk prioritization, and inspection reports will be accessible only by designated DOTD, contractor, and RTA staff. These items can be reviewed by these parties with access permissions granted, and this level of transparency will support the accurate record keeping of all RBI program data. If deemed appropriate, the SSOA can require permissions be customized so that some approved users are granted view-only access without the ability to add, modify, or delete files. In addition, SharePoint Lists functionality includes the option to require approvals for changes to be made and the SSOA may determine this additional level of approval is appropriate for modifying or deleting existing files.

Because human error can still occur, however, RBI folders in NORTA's SharePoint platform will log changes to all files in the shared RBI folders. With logging enabled, any occasion where data is added, modified, or deleted is recorded. Each file saved to shared folders will have file history embedded, with changes logged and time stamps and users attributed to each change. If a file is changed unexpectedly, the SSOA will contact the RTA CSSEM to address issues and users involved.

3.2.8 How the SSOA will protect Security Sensitive Information (SSI)

DOTD will protect SSI in accordance with 49 CFR Part 674.23 and Louisiana state law. Section 10 of the SSO Procedures Manual includes additional detail about the SSOA's requirements under the Louisiana Public Records Act, also known as Louisiana's Sunshine Law. NORTA is subject to the same state and federal laws in its protection of security sensitive information.

4. Inspection Prioritization

4.1 Prioritization of Safety Concerns to Inform Inspections

The SSOA will prioritize inspection activity through analysis of maintenance, safety, and past inspection data, as is required in 49 U.S.C. § 5329(k)(4)(B). The SSOA will use qualitative and quantitative data to evaluate potential safety risks from the equipment, infrastructure, and practices specific to NORTA, identifying concerns to be prioritized for inspection. This ongoing analysis will inform inspection planning so that highest risk conditions are addressed first.

4.2 Metrics used for Inspection Prioritization

Using the data identified in section 3, DOTD and NORTA collaborated to develop metrics that support trend analysis over time. To evaluate relative risk of system equipment, infrastructure, and practices, the SSOA will use the metrics listed in Category 4 of the SSOA's Procedures Manual. These metrics will determine priorities for inspection.

4.3 Safety Concern Prioritization Rating Procedures

The SSOA will use a rating system to categorize higher and lower safety concerns. The SSOA will develop ratings for each assessed component based on the severity of its potential failure and the likelihood in which that failure may occur. These severity and probability ratings are then plotted together on the SSOA's safety risk matrix to support the prioritization of inspections.[32]Equipment, facilities, or procedures whose failures intersect at higher levels of severity and probability receive higher overall risk ratings, and those that intersect at lower levels of severity and probability receive lower risk ratings. This process does not replace or supersede RTA Safety Risk Management processes.

4.4 Inspection Prioritization Procedures

The SSOA will prioritize inspections of NORTA's Streetcar system based on the risk ratings described in the section above and in greater detail in Section 13 of the SSO Procedures Manual. The highest priority equipment, infrastructure, and practices will be prioritized for inspection first, and the SSOA will include clear documentation showing how safety concern ratings inform inspection prioritization. This information will be presented in writing to the RTA at the time of inspection. These processes will include the collection of data, photographs, testimony and/or other inputs identified as critical based upon the conditions facilitating the inspection. Proper protocols, procedures, and other measures for facility entry and staff deployment, including use of all required safety equipment and materials, will comply with existing safety guidelines.

[32] The SSOA's safety risk matrix and NORTA's Safety Risk Index are both based on MIL-STD-882E, but each are distinct and different from one another, and they are used independently.

4.5 Continuous Process for Risk-Based Inspection Prioritization

The SSOA's data analysis and prioritization process is ongoing and will be updated to reflect changing safety conditions. When system conditions change, the SSOA will analyze new data and develop new prioritization ratings; these will inform potential revisions to inspection priorities. Unless required by activities, or changes in system safety, the SSOA will schedule and perform an updated safety analysis and inspection prioritization at a minimum, quarterly.

5. Inspections Commensurate with RTA Size and Complexity

Each state's SSOA is required to conduct risk-based inspections at each RFGPTS they oversee commensurate with their size and complexity. NORTA's rail system size and complexity are measured by its mode, physical characteristics, and operational characteristics. NORTA operates historic streetcar rail, which runs single rail vehicles at slow speeds and by its nature is noncomplex.

Physical and operational characteristics can change over time, so the SSOA will use a subset of data reported to and verified by NTD to support system size and complexity determinations for a given year. Physical characteristics may include those such as system vehicles and facilities, and operational characteristics may include operating expenses, ridership, average revenue speed, and safety events, among others. The specific characteristics used by DOTD are found in Category 5 of the SSO Procedures Manual. These characteristics reflect NORTA's designation by the SSO as a small, noncomplex system, justifying a minimum of four risk-based inspections as of the beginning of the RBI program.

6. SSO Qualifications and Training for NORTA Streetcar RBI

In accordance with 49 U.S.C. § 5329(k)(4)(C), the DOTD SSO program must have sufficient personnel and skill sets to effectively implement and manage a risk-based inspection program. To ensure adequate staffing and resources, three elements are reviewed and updated annually by the SSO: the SSO Workload Assessment (WLA), inspection personnel qualifications, and a Technical Training Plan (TTP), each of which are detailed in the SSO Procedures Manual.

The Technical Training Plan (TTP) identifies both the general technical training requirements of the SSOA program and the specific skill sets necessary to carry out the SSOA program at the RTA overseen by the program. The DOTD SSOA will review and update the TTP annually. This will include a general review of the SSOA program requirements from a federal and state perspective, as well as a consultation with the RTA to ensure that the specific requirements regarding access to their properties and other aspects of their individual operations are covered. During the SSO and NORTA's Monthly Safety Coordination Meetings, a standing risk-based inspection agenda item serves as the opportunity to discuss and update agency-specific training requirements. In addition, NORTA's safety team will inform the SSO about upcoming trainings when they are finalized, providing as much advanced notice as is feasible so the SSO can plan in advance to attend, if needed.

In general, the SSO Program Manager and contractors will fulfill the same training and certification requirements as the RTA's CSSEM for competencies related to rail safety and risk-based inspection. The TTP contains these specific competencies and requirements, which will be updated annually to meet federal requirements and align to those of the RTA CSSEM. The SSOA must ensure all personnel directing inspections have been trained and certified according to 49 CFR Part 672, PTSCTP, TSSP, and RTA specification to safely access RTA properties and alignments.

APPENDIX G: REQUIRED APPROVALS

The LMSC, pursuant to the safety committee provisions of the PTASP final rule (49 CFR Part 673) and statutory requirements in Title 49 U.S.C. § 5329(d) as amended by the Bipartisan Infrastructure Law, reviewed and considered the approval of the draft ASP during its regular, **fourth quarter meeting**. Below is a summary table of the final approval vote via Microsoft SharePoint Forms.

The ASP was approved by the LMSC by simple majority in accordance with voting provisions of SAF5 and the LMSC SOP (SOP #004-011).

Id	Start time	Completion time	Email	Please enter your name (First Last):	Are you representing Labor or Management?	LMSC Member	Do you approve the draft ASP as presented?
2	12/3/2024 18:35	12/3/2024 18:36	anonymous	Robert Clapp	Labor	Yes	Approve
3	12/5/2024 10:35	12/5/2024 10:35	anonymous	Floyd Bailey Jr	Management	Yes	Approve
4	12/5/2024 10:37	12/5/2024 10:37	anonymous	Korrie Mapp	Management	Yes	Approve
5	12/12/2024 17:46	12/12/2024 17:46	anonymous	Darius Hollins	Labor	Yes	Approve
6	12/17/2024 21:12	12/17/2024 21:12	anonymous	Darian Epps	Labor	Yes	Approve
7	12/17/2024 22:50	12/17/2024 22:50	anonymous	Kentrella Crawford	Management	Yes	Approve
8	12/19/2024 13:53	12/19/2024 13:54	anonymous	Jacques Robichaux Sr.	Management	Yes	Approve

PLACEHOLDER: BOARD RESOLUTION