New Orleans Regional Transit Authority

AGENCY SAFETY PLAN

Effective: December 13, 2022

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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RTA Committed to Safety

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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 "SMS" shared drive and is exclusively maintained by designated Safety Department staff. Printed copies of this document are uncontrolled and may not be current.

This plan is complemented by, and dependent on, other supporting policy documents issued by RTA, and is updated at least annually in accordance with federal and state requirements. The Chief Safety 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

Purpose and Scope

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

The ASP is specifically developed to:

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

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

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

Effective December 2020, all positions described in this plan are directly employed by RTA. Staff serving as project or contract managers are responsible for ensuring

[1] La. Admin. Code tit. 70 § IX

contractors comply with the ASP and any referenced policies and procedures.

As SMS Executive, the CSEM is directly responsible for updating the ASP to reflect the current operation in accordance with state and federal requirements.

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

Safety Management System Components

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

Each subcomponent is addressed in this ASP.

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

Section I: Safety Management Policy

1.1 Chief Executive Officer's Safety Management Policy Statement

The RTA Safety Management Policy (SAF3) contains the agency's formal Safety Management Policy Statement and may be accessed on the intranet or "Company Policies" folder on the shared drive. It is reviewed and updated annually, to ensure it aligns with the ASP and vice-versa. As SMS Executive, the CSEM is responsible for maintaining and updating the Safety Management Policy in accordance with FTA requirements under 49 CFR Part 673.23.

1.1.1 Safety Performance Targets

Under the requirements of 49 CFR Part 673.11(a)(4), the RTA ASP must address the applicable requirements set in the FTA's NSP and codified at 49 CFR Part 670 including the establishment of Safety Performance Targets (SPTs). While the Safety Management Policy makes reference to these targets, the SPTs themselves are established this Plan-- see APPENDIX A: 202**3** SAFETY PERFORMANCE TARGETS.

The required metrics are associated with National Transit Database reporting requirements as follows:

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

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

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

SPTs are established annually in coordination with all pertinent departments, members of the executive leadership team ("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.

1.1.2 Annual Review and Update of the ASP

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

Upon receipt of tentative approval from the SSO, the CSEM then sends the ASP to the RTA Board of Commissioners for review and approval in accordance with 49 CFR Part 673. The internal process for review, revision as needed, and approval is found in RTA Standard Operating Procedure (SOP) 004-002.

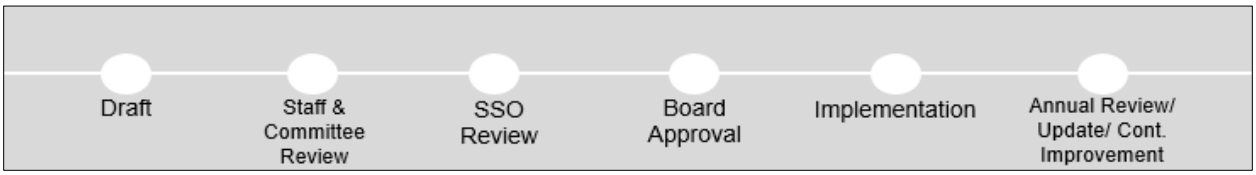


Figure 1 ASP Review Cycle

1.1.3 Maintenance of the ASP

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

1.2 Safety Management Accountabilities and Responsibilities

In compliance with 49 CFR Part 673.23(d), RTA has established its organizational accountabilities and responsibilities related to its SMS in this section as well as in SAF3 and the Safety Committee Structure Policy (SAF5).

1.2.1 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 SMS Policy throughout the agency
- Ensuring that all executive level personnel are held responsible for implementation of SMS in their respective areas; and each actively and continuously communicates the RTA SMS Policy and the area-specific SMS requirements to all employees in their areas
- Approving this ASP and the Transit Asset Management Plan ("TAM Plan"), and knowing and understanding the contents of both documents
- Ensuring that risk is appropriately addressed system-wide; and directing resource allocation accordingly
- Directing required actions to address non-compliance with the ASP
- Managing continuous improvement activities.

Chief Safety and Emergency Management Officer

The CEO has delegated the authority and responsibility for day-to-day implementation and operation of the SMS to the CSEM. The CSEM serves as the RTA's SMS Executive and as such, is the agency's Subject Matter Expert (SME) on SMS and Public Transportation Agency Safety Plan requirements. The CSEM reports directly to the CEO per the requirements of 49 CFR Part 673.23 (d)(2). The CSEM chairs, facilitates, and provides technical assistance to each of the safety committees established by SAF5.

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

The CSEM 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 CSEM guides the areas and departments with information about safety risk management to ensure that they understand the level of safety risk and expectations as to mitigations and/or corrective actions. Once risk is assessed, each department will provide documented results of the assessment(s) to the CSEM, who will maintain a master hazard log as necessary. Generally, this process is managed "by exception," meaning areas identified as normal or recurring hazard mitigation or resolution activities

(e.g., pre-trip inspections, preventive maintenance, purchase orders) are not re-entered on the CSEM's log every day, but rather exceptional events, such as new and previously unforeseen hazards, instances of practical drift, and adverse events will be entered and promptly managed in close coordination between the department and the CSEM.

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

The CSEM performs the following safety-critical activities:

- Developing and maintaining the ASP
- Developing and maintaining RTA emergency operations plans including but not limited to all-hazard plans
- Overall monitoring of the SMS program and ensuring immediate corrective actions are implemented to address deficiencies of the SMS
- Providing primary consultation and guidance on SMS implementation throughout the agency
- Providing information, recommendations, and status reports to the CEO on resource allocation supporting the SMS
- Chairing safety committee meetings to address system hazards and other safety concerns
- Conducting independent (but coordinated) SA activities, such as inspections, audits, assessments, and observations in the departments as necessary
- Conducting safety promotion activities, such as surveys, stand-downs, and campaigns in coordination with departments
- Maintaining and monitoring CAPs and Hazard Logs for the agency, and supporting and assisting departments in implementing corrective actions
- Overseeing contractor, RTA employee, and the general public's safety during construction activities
- Monitoring and verifying departmental data analysis and trending
- Developing and conducting training as needed with external agencies, i.e., emergency responder training, contractor training, and emergency drills
- Establishing system-wide safety training objectives, training QA activities and training plans and procedures, including a training matrix by position
- Participating in and leading formal meetings with LADOTD, ELT, and other RTA management on safety issues
- Developing and supporting safety and emergency management policies, procedures, and programs

- Implementing the Internal Safety Management Audit (ISMA) Program in compliance with SSO requirements and this ASP
- Overseeing and supporting departmental assessments, investigations, inspections, and SA activities to ensure full compliance
- Supporting the departmental collection and analysis of safety data; and reviewing reports, records, and documents of this analysis by departments
- Identifying safety concerns, analyzing reports and information, supporting the development of programs for improving workplace safety
- Assisting in claim investigations of work-related injuries or disabilities and preparing of files for litigation
- Establishing and implementing effective industrial hygiene and occupational policies and procedures for transportation and maintenance functions
- Establishing criteria for the selection, maintenance, and proper use of personal protective clothing and equipment
- Developing mandated training programs

Chief Operating Officer

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

The COO has responsibility for the following areas:

A. Bus, Rail, and Paratransit Operations
B. Bus, Rail, and Paratransit/Automotive/Non-Revenue Vehicle Maintenance
C. Communications and Control (i.e., Operations Control Center – OCC)
D. Data Science and Performance Accountability
E. Service Planning and Scheduling
F. Operations and Maintenance Training

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

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

1.2.2 Organizational SMS Accountabilities and Responsibilities

Beyond these key positions for instituting and promoting the SMS, all members of the ELT share SMS responsibilities. As of the adoption of this ASP, the following positions comprise the ELT and share the responsibility to ensure the ASP is followed consistently throughout the organization:

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

Each member of the ELT also participates in the SMS Steering Committee in accordance with SAF5.

The subsections “Common SMS Responsibilities,” “Additional SMS Responsibilities by Level,” and “Additional SMS Responsibilities by Function” describe in greater detail the responsibilities and accountabilities owned by each department or functional area reporting to the ELT.

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

1.2.2.1 Common SMS Responsibilities

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

A. Safety Goals and Objectives: the CSEM or designee coordinates with each area to establish goals with corresponding objectives that support both Safety Management Policy objectives and SPTs. In consultation with the CSEM, each area monitors progress to ensure the goals, objectives, and targets (as applicable) are being met. This is primarily monitored and reviewed in ELT and SMS Steering Committee meetings.
B. SMS Training:
    a. Rail – Key personnel identified in this ASP as having direct responsibility

for safety oversight of the rail fixed guideway system, whether at the direction of or in coordination with the CSEM, must meet the requirements of 49 CFR Part 672, including refresher training at 2-year intervals. The regulation requires that personnel to whom this applies must meet the requirements within three years of being hired or promoted into the "key" position.

b. All Other Personnel – Personnel not identified as Key Personnel are not required to meet 49 CFR Part 672 requirements at this time, however, they should be proficient in SMS methodologies and practices, and knowledgeable about all safety program requirements.
    i. A one-hour, computer-based training module of RTA's "SMS 101" course is under development and will be included in the mandatory trainings for all employees through the Neogov portal managed by HCWD. At present, it is provided in-person to all new hires during orientation.

C. Employee Safety Reporting Program: all employees share the responsibility to report hazards and safety concerns via approved means. Presently, hazards may be reported via the Safety Hotline, through the Hazard Report Form, directly to Safety Department personnel, to a department manager, or through a safety committee.
D. Hazard Identification, Analysis, and Mitigation: each area is responsible to identify hazards in its daily activities and responsibilities; and to fully document all of these activities, following the direction of the Safety Department. FTA guidance directs the CSEM, 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.
E. SMS Implementation: all functional areas must assess their own compliance with the RTA ASP and SMS implementation objectives and action items, and regularly brief the CSEM on SMS implementation progress. The SMS Steering Committee reserves time during its quarterly meeting for receiving and reviewing implementation status. The Safety Department compiles status notes from all other departments into an Implementation Update which it updates on a quarterly basis and provides to the SSO as required.
F. Participation in ISMAs: Progress relative to SMS implementation objectives and compliance with the ASP and referenced policies and procedures are reviewed during recurring ISMAs with each safety-critical function. Before, during, and immediately following each audit, each functional area must be responsive to the requests of the audit team and participate fully. Audits are convened by the CSEM in accordance with SOP 004-100: Procedure for Performing Internal Safety Management Audits (ISMAs). (Also see **3.3 Internal Safety Reviews**.)
G. SMS Documentation: requirements of both 49 CFR Parts 673 and 674 indicate that all areas must have formal documentation of all safety management

activities. For record-keeping purposes safety management activities are defined as any activity pertaining to one or more of the 11 subcomponents of SMS as directed in this ASP. All SMS documentation must be reviewed as part of the annual ASP review and update process to ensure that any changes to the ASP do not create conflict. The department should consult with the Safety Department for technical assistance.

H. Contractor Oversight: Where applicable, functional areas are responsible for safety management oversight of contractor activities (for contracts which they directly manage or oversee), documentation and safety management processes, and documentation of those oversight activities. The department should consult with the Safety Department for technical assistance

1.2.2.2 Additional SMS Responsibilities by Level

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

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

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

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

1. Adequate resources are available to appropriately manage safety risk in their areas.
2. Effective mitigation and corrective actions are developed, implemented in a timely fashion, and monitored appropriately to assure safety is maintained, as appropriate.
3. There are no barriers to employee reporting of safety hazards and issues, and that reports are promptly addressed through the safety risk management

process.
4. Safety management 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, monitored for verification or needed corrective action.
6. They participate fully in the SMS Steering Committee and other safety committee processes.
7. Safety is a core business function in their areas and departments.
8. Safety information is shared openly with the Safety Department and all other departments in support of the SMS.
9. All significant changes are properly managed in accordance with the Management of Change section of this ASP.
10. Safety investigations, audits, inspections, and corrective actions are managed using the organizational approach; that is, focusing on organizational deficiencies and systemic issues instead of individual actions taken or errors committed by front-line employees, where feasible.
11. Adequate safety training, awareness and oversight is provided to employees in their areas of control.
12. A positive safety culture is actively fostered in their area and system wide.
13. Full and open cooperation is affected with State Safety Oversight activities, federal authorities and other external safety agencies as required.

Technical management level:

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

- ensuring directives are implemented from the executive level in safety management,
- promptly informing executives of safety lapses, failures, hazards, and resource shortages,
- visibly demonstrating commitment to safety,
- providing tools and resources needed to safely perform job requirements,
- providing information pertinent to the management of safety to employees, and
- encouraging the reporting of hazards and assuring safety is incorporated in all daily tasks and activities.

Technical Management must personally ensure and be accountable to:

1. Take strategic direction from the Executive level in all aspects of safety management, including daily activities, hazard and safety risk management, safety data, investigations, employee reporting, and 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 safely managed and performed.

4. Ensure that employee reports of hazards are properly investigated, mitigated as appropriate and reported to executive management and/or the Safety Department as appropriate; and employees are kept apprised of activities concerning their reports.
5. Ensure that contractors and vendors are educated on RTA safety practices and are held to the same requirements.
6. Coordinate implementation of safety mitigations and SA activities with the Safety Department as appropriate.
7. Monitor and endorse proper safety promotion and awareness activities.
8. Implement management of change activities in coordination with the Safety Department.
9. Identify organizational failures with Executive management, and cooperatively work to implement mitigations and corrective actions to address failures.
10. Participate actively in the safety committee process as directed and assigned, including preparing, reviewing, and sharing safety information.
11. Foster a positive safety culture system wide.
12. Cooperate fully and openly with State Safety Oversight activities, federal authorities and other external safety agencies as required.

Front-Line employees:

Front-line employees are expected to:

1. Promptly recognize and report all hazards and/or potential consequences of hazards that, without mitigation, would result in an unacceptable level of safety risk, coordinating with the Safety Department as necessary.
2. Fully participate in the safety committee process as appropriate.
3. Attend training that will aid in safe job performance.
4. Safely carry out assigned tasks in accordance with training and procedures.
5. Communicate effectively with other employees, supervision, and management.
6. Foster a positive safety culture system wide.

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

1.2.2.3 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.

Security

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

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

The Chief of Security provides training for the agency in all security-related areas, including exercises and drills (in close coordination with the CSEM so as to ensure conformance to the All Hazards Plan, its annexes, and the Exercise Plan). Additionally, the Chief of Security conducts regular Threat and Vulnerability Assessments (TVAs) and other audits, examinations, and reviews to assess the agency's readiness and resiliency with regard to security events.

Bus & Rail Operations

RTA's Director of Bus & Rail Operations and their team of Service Delivery 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
- Maintaining, reviewing, and revising of the Rulebook in coordination with the CSEM
- Implementing rules compliance programs for operators, dispatchers, 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 corrective action
- Investigating employee reports of hazards and taking corrective actions as necessary
- Equipment inventory and tracking
- Managing employee discipline
- Safety messaging
- Ensure representation for all classes of front-line employees on appropriate employee safety committees

Bus & Rail Communications

Safety-critical activities are described below:

- Control of employee sign-in, attendance procedures, run assignments, yard supervision, and discipline in accordance with agency rules and procedures
- Conduct of visual fitness-for-duty checks upon operator sign-in for duty
- Dissemination of safety-critical drivers' alerts and other notices
- Managing and directing control center operations and safety

- Responding to and managing of operational emergencies
- Coordination and communication with other departments system-wide in response to incidents or service disruptions
- Dispatching operations supervisors to incidents and accidents as necessary, and closely coordinating with Safety and Security departments in connection with events
- Internal safety messaging

Maintenance

Maintenance is responsible for the following safety-critical activities:

A. Transit Asset Management
B. Maintenance Training
C. Warranty Programs
D. Maintenance
    a. Streetcar Maintenance
    b. Rail and Bus Infrastructure Maintenance (Power, Signals, Rail, Grounds)
    c. Materials Management
E. Maintenance Quality Assurance

Safety-critical activities for these areas are described below.

- Ensuring proper training of all new mechanics and technicians to safely and effectively inspect, maintain, and repair the agency's fleet
- Training all maintenance staff in emergency/safety procedures and injury and illness prevention as appropriate
- 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
- 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 CSEM on safety requirements of materials
- Monitoring safe handling of and minimizing employee and environmental exposure to potentially hazardous products and materials.

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

- Assuring that infrastructure is properly maintained and available in safe operating condition according to RTA's procedures
- Providing necessary mechanisms for reporting defects and hazardous conditions
- Implementing the agency's Roadway Worker Protection program to ensure employee and contractor safety along the entire streetcar trackway
- Administering and monitoring standardized programs, policies, and procedures,

and the Rail Maintenance Plan
- Monitoring safe handling of and minimizing employee and environmental exposure to potentially hazardous products and materials.
- Ensuring appropriate action to resolve reported or otherwise identified hazards in a timely manner
- As appropriate, coordinating the development and testing of engineering solutions as a means of addressing infrastructure-related hazards
- Serving as liaison with various municipalities and other external agencies for hazard resolutions involving infrastructure

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 and all other contractor activities
- Ensuring there are no unauthorized modifications to vehicles and equipment

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
- Station locations and amenities
- Accessibility issues regarding RTA facilities and bus stops
- Community outreach

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

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

Operations Training

The Manager is fully responsible for SMS compliance in the development and delivery of training—including mandatory refresher, post-accident, and recertification training—for transit 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 Manager of Operations Training performs the following safety-critical activities:

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

Chief Financial Officer (CFO)

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

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

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

A. Budget Development and Administration
B. Grants Administration
C. Procurement
D. Third Party Audit
E. DBE Compliance
F. Revenue Collection
G. Accounting

Procurement

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

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

Customer Service

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

- Oversight, monitoring, and supervision of the customer service team
- Monitoring and ensuring proper handling of consumer complaints, suggestions, commendations, miscellaneous calls and correspondence relating to the agency
- Investigating complaints and concerns, employee reports of hazards and other required events, including coordination with other departments and preparing reports as necessary
- Collecting and performing trend analysis on customer and employee reports, concerns, and complaints
- ADA and reduced fare program eligibility and customer relations
- ADA compliance

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, 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).

Human Capital and Workforce Development

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

The Chief HCWD Officer manages hiring, employee information, worker's compensation, administrative organizational development, and employee programs. HCWD is responsible for assuring that staff positions are effectively defined and classified and that qualified personnel are identified to meet staffing needs. This department also manages the contracted employee assistance programs, including the program for substance abuse. This department also administers and oversees the Workers Compensation and Drug and Alcohol Programs in accordance with federal and state requirements.

Safety-critical activities include:

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

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 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 U.S. DOT and FTA requirements.

Planning and Infrastructure

RTA's Deputy CEO Planning and Infrastructure reports to the Accountable Executive.

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

A. Safety and Security Certification/Acceptance and the Safety and Security Certification Program Plan (SSCPP)
B. Fleet Advancement
C. Facilities Maintenance
D. Environmental Compliance
E. Information Technology (IT)
F. Transit Stop Maintenance

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

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

Fleet Advancement

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

- Assuring that the vehicle fleet is properly maintained and available in safe operating condition according to RTA's procedures
- Providing necessary mechanisms for reporting defects and hazardous conditions
- Administering and monitoring standardized programs, policies, and procedures, and the Vehicle Maintenance Plan
- 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.

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, State, and Federal environmental protection and hazardous waste requirements.

Information Technology

RTA's Director of Information Technology (IT) reports to the Deputy CEO Infrastructure and Planning. 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
- 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.

Transit Stop Maintenance

The Transit Stop Manager develops, manages, and administers all aspects related to streetcar and bus stop maintenance, the stop inventory database, temporary relocations or closures, improvement projects related to asset management and ADA compliance. The Transit Stops Manager also assists the Director of Facilities by managing several contracts for stop maintenance functions, ensuring compliance with contract terms

relating to 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 Infrastructure departments for use by the staff using data from automatic passenger counters and scheduling software.

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

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

The Safety Department, under the CSEM's direction, coordinates a review of the status of required training per the PTSCTP during the annual review and revision of the ASP. The CSEM maintains a safety training matrix for the key SMS positions and pursues external training opportunities in support of meeting these training needs by the specified compliance dates, to the extent practicable, e.g., FTA, Transportation Safety Institute (TSI), the National Safety Council.

Key SMS personnel are responsible for complying with PTSCTP and internal SMS training requirements, including refresher training every two years. (Also see **4.1**

Competencies and Training.)

1.3 Integration with Emergency Management

RTA develops, maintains, and implements all emergency management documentation as required by 49 CFR Part 673.11(a)(6), hereby incorporated by reference. Jurisdictional agreements, including Memoranda of Agreement/Understanding (MOU/MOA), are also maintained by RTA.

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

The CSEM ensures that resources are properly allocated to support emergency management functions in a manner that achieves SMS goals and objectives and addresses any SMS deficiencies. The CSEM may use SMS Steering Committee and/or ELT meetings and proceedings to ensure a strong level of cross-departmental coordination on emergency management matters. Additionally, the CSEM 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/Agreement with law enforcement and emergency management partners
3. Emergency Exercise Plan
4. After Action Reports

1.4 SMS Documentation

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

The CSEM 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, SMS Steering Committee meetings, Internal Safety Management Audits, 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.

An up-to-date list of controlled, final versions of policies is maintained on the “SMS” drive and are available upon request.

At present, a company-wide SharePoint intranet site is under development.

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 CSEM.

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.

Pursuant to statutory requirements in Title 49 U.S.C. Section 5329(d), 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, any SRM actions will be carried out in a manner that is consistent with guidelines of the Centers for Disease Control and Prevention and/or state/local health authorities.

2.1 Hazard Identification

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

2.1.1 Hazard Identification Sources

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

1. Reactive hazard identification involves analysis of events or outcomes that have already occurred. Hazards are identified through investigation of safety occurrences (including close calls), adverse events and hazard reporting from the field (such as rules compliance activities, safety committee meetings and customer reports) where adverse outcomes have been experienced in the system.
2. Proactive hazard identification involves real-time situations, such as through departmental inspections, audits, evaluations, observations, and assessments; proper management of change; training quality assurance programs; and the

employee and contractor safety reporting programs. Job Hazard Analyses (JHA) identify and support a thorough analysis of hazards that may reasonably be encountered during the performance of a specific job or task. RTA actively seeks to identify hazards and mitigate them effectively before adverse events occur.

3. A specialized subset of proactive hazard identification is predictive identification, which involves the thorough and timely analysis of safety data collected by all departments to identify possible negative future outcomes or events; as well as monitoring the system in real time.
4. FTA and SSO data and information as required by 49 CFR Part 673.25(b)(2), as well as industry experience, best practices, and lessons learned.
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.

2.1.2 Employee Reporting Systems

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

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

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

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

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

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

Designated Safety Department staff enter, track, monitor, analyze, and close hazards, or “tickets” through a cloud-based software application, “Vorex.” This tool is convenient for staff to use and provides for increased trend analysis capabilities.

A public-facing web-based tool and application called “Elerts” is expected to be launched in 2023. It will allow riders and the public to anonymously report safety and security concerns from the convenience of their smart phone.

Customer Service manages customer safety complaints, which are forwarded to the

responsible department and the CSEM as applicable. The department investigates the report and develops and implements corrective action as needed, in coordination with the Safety Department. Employees can also use this process as an anonymous option.

No matter what the source of information is or which department investigates and resolves the issue, the feedback loop to the reporting employee is required, as applicable. For hazards or issues that are deemed “unacceptable” following the SRM process, the outcome of the report, investigation, corrective action, or mitigation is distributed to the SMS Steering Committee for handling as appropriate. In turn, the results are forwarded to each Departmental Safety Committee (or if a DSC is unavailable, to the department management for local dissemination). (Also see Section IV – Safety Promotion.)

Protections for Employees Reporting Adverse Safety Conditions

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

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

Unprotected Self-Reporting

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

2.1.3 Hazard Investigation

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

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

agency expects to be a realistic and imaginable consequence of the hazard.

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

Category	Description	Severity Definitions
1	Catastrophic	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[2])

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

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

Table 2: Safety Risk Likelihood

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

2.2 Safety Risk Assessment and Prioritization

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

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

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

Table 3: Safety Risk Index

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

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

SAFETY RISK ACCEPTANCE CRITERIA			
	SRI	Decision Authority	Special Conditions
High	1A, 1B, 2A, 2B, 3A	Unacceptable	Requires immediate resolution*
Medium	1C, 1D, 2C, 2D, 3B, 3C	Undesirable	Actions require ELT and CSEM review and approval, with concurrence from the CEO*
Low	1E, 2E, 3D, 3E, 4A, 4B	Acceptable with Review	Requires dept. management review in consultation with CSEM or designee. Results must be recorded on Safety's Hazard Log
Acceptable	4C, 4D, 4E	Acceptable	None – Can be managed at department-level. Safety may audit dept. Hazard Log

Table 4: Safety Risk Acceptance Criteria

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

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

Based on the approved decision authority level that results from the safety risk assessment—unacceptable, undesirable, acceptable with review, or acceptable—the department performing the assessment is responsible for notifying the appropriate parties immediately, if they are not already involved. If the ELT must be notified, the CSEM may recommend calling an emergency meeting of the ELT and/or SMS Steering

Committee as appropriate.

2.3 Safety Risk Mitigation

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

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

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

The hierarchy of mitigation as defined by FTA is:

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

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

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

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

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

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

Safety risk mitigations and CAPs are selected for safety committee review at the discretion of the CSEM.

Risk still inherently exists even after mitigation; the department is responsible for monitoring the mitigation, in coordination with the CSEM or designee, and promptly reporting to the CSEM if the mitigation is ineffective or introduces unintended hazards. The CSEM 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 CSEM,
- Who is responsible for implementing the MMP, and
- What should be entailed in the monitoring.

(Also see Section III – Safety Assurance.)

2.4 Tracking

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

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

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

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

- ID number
- Hazard description– refers to a brief narrative summary of the hazard – what it

is; where it is located; what elements it is comprised of element of RTA's operation affected by the hazard
- Date identified
- Hazard source– indicates the mechanism used to identify the hazard, e.g., operator report, near-miss, accident investigation, internal safety management audit, rules compliance program, facility/equipment inspection, formal hazard analysis
- Safety Risk Index (SRI)- whether assessed by the department with support from the CSEM 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.

2.5 Risk Reduction Program

Pursuant to Title 49 U.S.C. Section 5329(d) as amended by the Bipartisan Infrastructure Law, RTA's SRM and SA processes comprise a "Risk Reduction Program" that will, in connection with other ongoing strategies and initiatives to improve employee and patron safety, aim to reduce the number and rates of accidents, injuries, and assaults on transit workers, including but not limited to the following, specific event types:

- Bus collisions (with vehicles and pedestrians);
- Assaults on transit workers.

RTA will continue to review guidance and forthcoming regulations in connection with Section (I) of the statute, which now includes the exploration of specific mitigations regardless of the outcomes of any SRM process. Namely, based on the language contained in the Bipartisan Infrastructure Law, the mitigations that RTA considers must include retrofits of bus fleets to reduce visibility impairments and the installation of operator barriers.

To the extent that the above hazards and their associated risk levels are reviewed as part of a compliant "Risk Reduction Program," the CSEM will invite the LMSC to jointly conduct one or more risk analyses.

At present, while the statute refers to "risk reduction performance targets," there are no changes to the NSP that can be used to establish baselines for these two event types, and therefore, FTA is not requiring that such targets be included in this ASP.

Section III: Safety Assurance

Safety Performance Monitoring and Measurement

RTA has established activities to:

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

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

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

In accordance with FTA requirements for Labor-Management Safety Committees, the Labor-Management Safety Committee (LMSC) members may bring forth any safety risk mitigation which they believe to be ineffective or not implemented as intended, during any regular meeting.

Additionally, pursuant to FTA Special Directive 22-32[3] and the requirement in 49 U.S.C § 5329 (as amended by the Bipartisan Infrastructure Law) for LADOTD to conduct "risk-based inspections" of RTA's rail system, RTA coordinates with LADOTD as necessary to ensure the inspections are fully incorporated into existing SMS practices, and in particular, SA. At present, LADOTD is developing detailed policies and procedures to administer this program.

3.1 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 CSEM or designee.

[3] https://www.transit.dot.gov/regulations-and-guidance/safety/fta-special-directives

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

- Employee reporting systems, including self-reporting
- Field reports and observations from supervision and managers
- Preventive maintenance and other scheduled inspections
- Results from drills and exercises, and critical incident debriefings from actual emergency events
- Internal safety management audits and SMS implementation documentation
- Quality assurance and quality control inspections, audits and other activities
- Employee, passenger and public reports of injury
- Planning and scheduling data collection
- Key performance indicators
- Accident and incident Investigation reports
- NTD data collection and reporting
- Drug and alcohol compliance programs
- Rules and procedures compliance activities
- Safety committee activities and reports

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

3.2 Rules and Procedure Compliance Activities

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

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

All Rulebook revisions must be reviewed and approved in a committee format, as described in the Rulebook. Updates may be selected for joint review by either the Labor Management Safety Committee or SMS Steering Committee, at the discretion of the CSEM.

Operations technical management and Executive-level management are responsible for monitoring compliance with rules and procedures.

Note: At this time, the process by which all rules compliance activities are coordinated between Operations and Safety is still in development. Additional SA tools and training are in development pursuant to an open CAP.

3.3 Internal Safety Reviews

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

1. Triennial Internal Safety Management Audit Program (ISMAs)

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

   SOP 004-100 dictates that prior notice is given to the SSO and all ISMA activities adhere to SSO requirements. Final audits are shared with the SMS Steering Committee and may be discussed at subsequent SMS Steering Committee meetings. The CSEM is tasked with overseeing the process and is certified to serve as Lead Auditor.

   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 CSEM may recommend changes to the topic list in-between Annual Reports, pending SSO concurrence.

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

2. Safety Department-led Safety Assurance (SA)

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

The CSEM oversees the process to ensure integrity and compliance, and has the discretion to require more regular reporting if necessary in a given area. Staff document their observations and any non-compliances using the appropriate SA form. The Safety Department has developed forms specific to certain, higher risk activities, e.g., special streetcar operations, flagging/Maintenance-of-Way, and special track work. Findings, trends, and concerns will be presented to 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 failing to comply with a procedure or committing an unsafe act. These one-on-one coaching sessions are then documented using a standard form.

3. Monitoring of Safety Performance Measures.

   Monitoring of the system wide Safety Performance Measures identified in Section 1.1.1 requires all departments that collect data directly applicable to the Performance Measures report these measures to the CSEM or designee at their request. Generally, progress relative to the SPTs set forth in the ASP will be reviewed in SMS Steering Committee 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 CSEM 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 COO and the Deputy CEO Planning & Infrastructure, who are responsible to oversee specific activities for SA that do not occur elsewhere in the agency.

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

1. COO
   a. Preventive, predictive, and corrective maintenance – rail, bus, paratransit/automotive/non-revenue maintenance and MOW
   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

2. Deputy CEO Planning & Infrastructure
   a. Facilities maintenance management
   b. Preventive, predictive, and corrective maintenance – facilities, fleet management, and transit stop maintenance
   c. Engineering, including contracted services
   d. Transit Asset Management support and interface
   e. Lifecycle Planning, including reliability and maintainability
   f. Supply chain, procurement and materials management and warehousing

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

3.5 Investigations

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

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

Major event investigations are the responsibility of the CSEM 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 by the CSEM.

Corrective actions stemming from any findings contained in the final investigation report must be developed by the departments and functional areas, in consultation with the Safety Department, and be approved by the SSO prior to implementation. Upon receipt of formal approval, actions are coordinated and managed by the CSEM 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

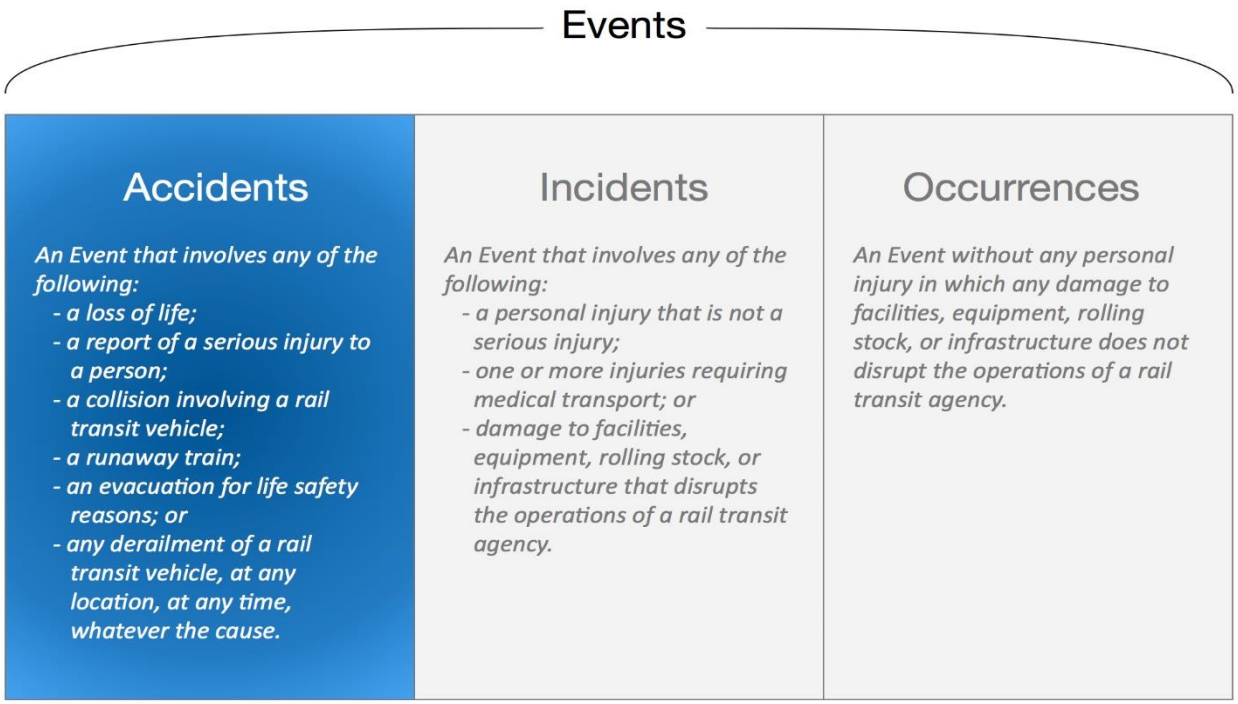
risk (likelihood and/or severity) associated with identified contributing factors in order to prevent reoccurrence. One or more CAPs may comprise a single safety risk mitigation.

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 CSEM, in accordance with SSOPS requirements. [Also see 3.7.1 Corrective Action Plans (CAPs).]

3.5.1 Event Reporting

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



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

RTA attends monthly meetings to discuss accidents, including reporting and the status

of investigations of SSO-reportable events, with the SSO. Additional follow-up meetings may be scheduled in coordination with the SSO, as necessary.

3.6 Management of Change

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

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

Each department and functional area must identify all changes, perform an initial evaluation, and then elevate and forward the concern to the CSEM as appropriate, given the level of safety risk determined. If the level of safety risk is undetermined, or if additional technical capacity is required before reaching such a conclusion, the CSEM or designee may lead the analysis. The CSEM may direct a safety committee to assist with the assessment per SAF5. In coordination with the department or functional area that is responsible for the change as well as the safety committee, the CSEM either implements or advises the department to implement mitigations so that the level of safety risk is managed to an acceptable level during and after the change. As SMS Executive, the CSEM may elevate the analysis and any resulting actions/mitigations to the Accountable Executive if necessary.

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

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

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

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, along with a scaled-down practice known as Safety Acceptance, is accomplished through a collaborative effort between the CSEM and the applicable Project Team, which may include representatives from other RTA departments as well as project contractors.

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

The Safety and Security Certification Review Committee (SSCRC) reports to and receives direction from the SMS Steering Committee, 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 discussed in safety committee meetings at the discretion of the CSEM. Additionally, internal safety reviews and external audits of the Infrastructure and Maintenance Departments will include a careful review of this process, to ensure it is performing as intended.

3.6.3 Procurement

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

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

1. The department or area must assess whether the change (procurement) will carry risk or introduce hazards.
2. If a consequence of the change being introduced is an increased level of safety

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

3.7 Continuous Improvement

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

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

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

The annual ASP revision cycle, managed by the CSEM in close coordination with the ELT, provides a framework for identifying and capitalizing on new opportunities to improve and grow the SMS.

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

3.7.1 Corrective Action Plans (CAPs)

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

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

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

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

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

Section IV: Safety Promotion

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

4.1 Competencies and Training

RTA is currently reviewing and updating its comprehensive safety training curriculum for all positions and functions. Training requirements that will be included in this comprehensive program for operations and maintenance positions (at a minimum) will encompass:

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

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

Additionally, as of 2022, 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
- 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.

Pursuant to statutory requirements from the Bipartisan Infrastructure Law, the comprehensive safety training that operations and maintenance personnel receive must include de-escalation training. RTA has taken steps to incorporate de-escalation techniques and strategies and processes for handling difficult situations onboard the vehicle, into existing, quarterly safety meetings.

The Manager of Operations Training and the Director of Professional Standards and Training are responsible for providing new and revised safety training programs to the CSEM for review. Presently, one (1) maintenance training instructor also reports directly to the Director of Bus Maintenance and provides on-the-job training exclusively for new-hire and existing personnel in Bus and Rail Maintenance areas.

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

- "SMS Awareness" online course through TSI – one hour; and
- Any external or vendor-provided safety- or security-related course which includes a minimum of one hour of safety oversight training.

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

At present, a one-hour introductory course on SMS concepts and shared SMS responsibilities is delivered to all new employees during new-hire orientation. Other introductory SMS presentations and workshops are available upon request and have been delivered to senior leadership team members and individual departments. The Safety Department develops and adapts its training to cover the following topics as needed:

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

4.2 Safety Communications

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

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

The primary safety communication responsibility of the ELT at RTA, under the requirements of 673.23(c), is to actively and personally communicate the Safety Management Policy to all employees and contractors. Any changes to the Safety Management Policy must be approved and distributed to all employees. All approved policies are shared in the “company policies” folder in the RTA public drive as well as through ADP. Additional tools for disseminating future revisions and for maintaining document control are under review.

Methods of communicating safety information to RTA employees include face-to-face meetings and interactions, sending agency-wide emails, posting and/or distribution of bulletins, department notices, 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.

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;
- Weekly, monthly, and quarterly safety meetings, typically administered by the department/division;
- Quarterly safety meetings (mandatory for Operations and Maintenance employees);
- Special request employee safety training programs delivered by the Safety Department;
- Safety posters, and posting of reports, information, statistics, data, notices, bulletins, awareness campaigns, flyers, health services, employee assistance programs and other safety information in employee work areas;
- Annual worker right-to-know programs and industrial safety training; and
- Periodic insurance carrier/broker assessments.

4.2.1 Safety Committees

The executive-level safety committee at RTA is the SMS Steering Committee, the primary group responsible to provide guidance and direction to the agency and to the Accountable Executive on acceptable and unacceptable risk, resource allocation, the

status of SMS implementation for each of their areas of control and the promulgation of safety policy and SMS agency-wide.

Pursuant to FTA requirements announced in a February 2022 “Dear Colleague” letter stemming from the Bipartisan Infrastructure Law, RTA created the LMSC as a joint advisory group with specific goals and objectives that were established by the law.

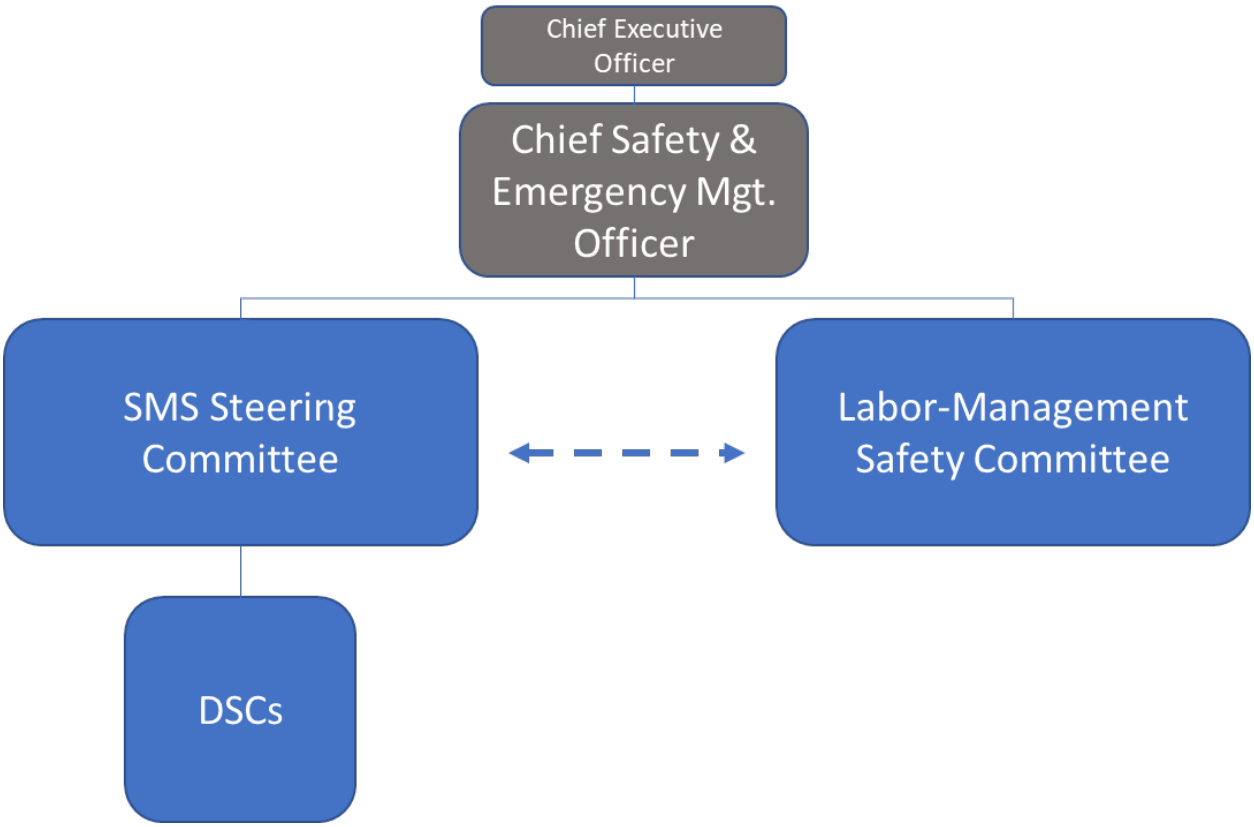


Figure 2 Safety Committee Structure (SAF5)

The LMSC as established in SAF5 complies with statutory requirements in Title 49 U.S.C. Section 5329(d) as amended by the Bipartisan Infrastructure Law, specifically subsections (1)(A) and (5)(A).

The roles, responsibilities, and basic procedures for both the SMS Steering Committee and LMSC are contained in the Board-approved policy, SAF5. Of note, the LMSC is explicitly required to approve this ASP prior to it being reviewed and approved by the RTA Board of Commissioners.

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

Other safety-focused committees that generally meet on an as-needed basis are

described further in SAF5.

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

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

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

4.2.3 Drug and Alcohol Compliance

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

The Designated Employee Representative (DER; reports to the Chief HCWD Officer) has primary responsibility for administering a Drug & Alcohol Testing Program in accordance with 49 CFR Part 40, Procedures for Transportation Workplace Drug and Alcohol Testing Programs and 49 CFR Part 655: Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations. SAF1 establishes procedures for the Drug

and Alcohol Testing Program, which is administered by the DER, in close coordination with Operations and Safety Departments. The appendix section of SAF1 includes both a list of DOT safety-sensitive positions under the current organizational structure, as well as a list of non-DOT (“RTA”) safety-sensitive position for which testing is conducted under RTA’s authority.

APPENDICES FOLLOW

APPENDIX A: 2023 SAFETY PERFORMANCE TARGETS

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

Streetcar

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	15	2.32	58	8.99	20,000

* As defined in the NTD Safety & Security Policy Manual, dated January 2020[4]
^ Includes major and non-major reportable events but excludes injuries related to assaults or other crimes (security events)
+ Includes major safety events only
Determinations of accident/incident preventability have no bearing on any SPTs per FTA guidance.

In 2021, RTA reported **59** streetcar mode events that met a major safety event threshold and **12** injuries. Note: Upon review of previous years' NTD data, the target of 18 events previously set in 2021 was not attainable. Staff have corrected the discrepancy in event tracking databases accordingly. The number and rate have since been updated to be more realistic based on actual event statistics.

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

Fixed-Route Bus

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	23	0.44	30	0.44	8,000

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

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

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

In 2021, RTA reported **23** fixed-route bus mode events that met a major safety event threshold and **21** injuries.

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

Non-Fixed-Route Bus (Paratransit)

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	6	0.72	6	0.72	40,000

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

In 2021, RTA reported **4** non-fixed-route bus mode events that met a major safety event threshold and **4** injuries.

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

General Notes

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

RTA's Safety and Security 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 SPTs. Due to differences in the reporting thresholds, the safety events reflected here are not necessarily the same as the events reported to LADOTD in accordance with 49 CFR Part 674.

All VRMs by mode are calculated using the most recent available year's actual, confirmed mileage data as shown in the NTD Agency Profile (NTD ID # 60032). The

below VRMs are used for all mileage-based targets:

- Streetcar – 645,164 (2021 VRM)
- Fixed-Route Bus – 5,266,290 (2021 VRM)
- Non-Fixed-Route Bus – 839,046 (2021 VRM)

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

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

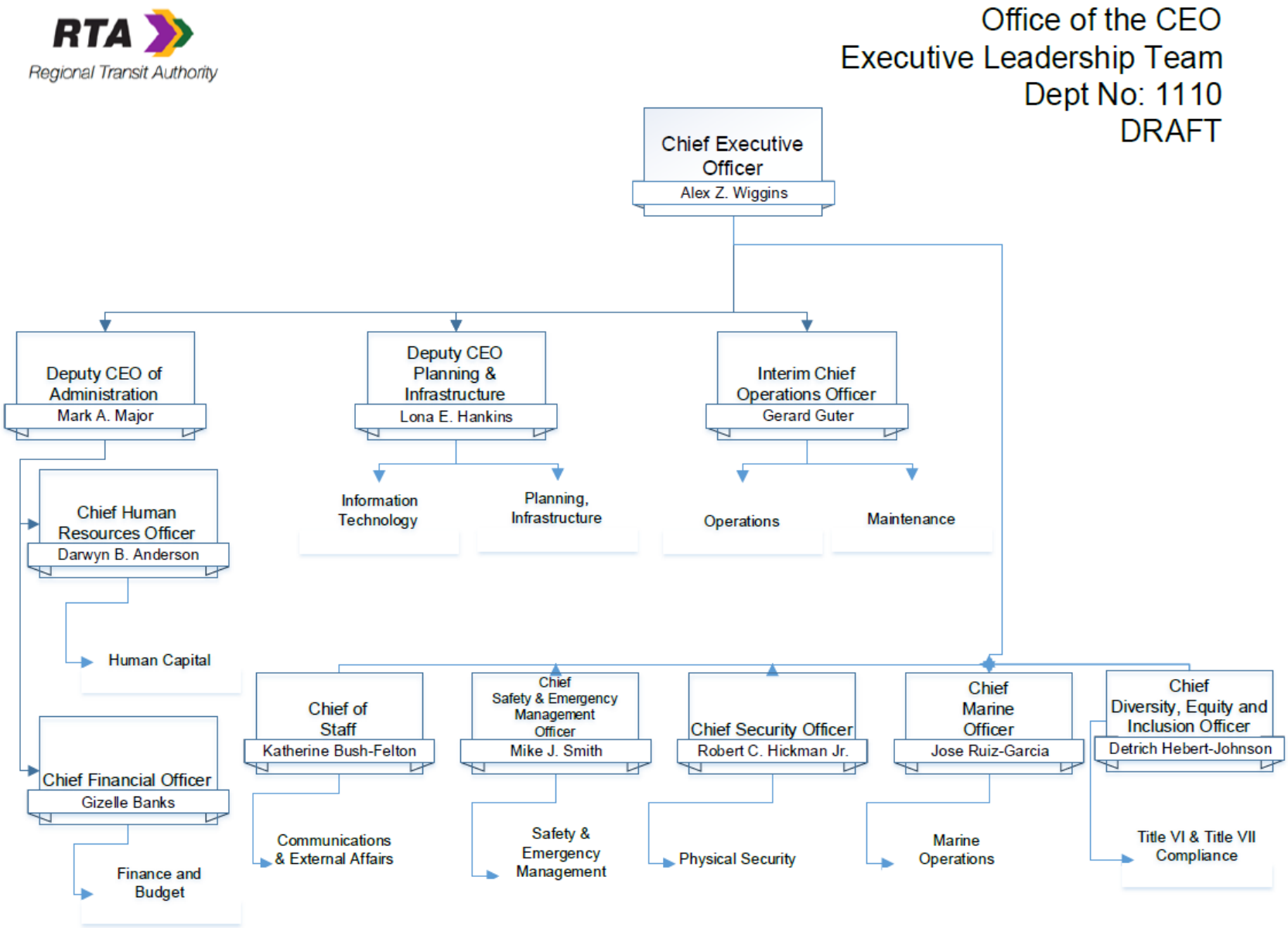
FTA's guidance on SPTs indicates that transit modes fall into one of three categories: rail modes, fixed-route bus modes, and non-fixed route bus modes. RTA's SPTs are established for these modes, accordingly. The safety performance of passenger ferry services is managed and overseen through separate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

For injuries, FTA uses the definition established by the NTD, which is "any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene." For the injury performance measure, FTA uses all injuries reported on both the NTD S&S-40 (major) and S&S-50 (non-major) forms but excludes injuries related to assaults or crimes (security events). This means a transit agency may have to report a crime-related injury to the NTD, but it would exclude that injury from its injury performance measures.[5]

For safety events, FTA uses all safety events that meet an NTD ***major event*** reporting threshold (events reported on the S&S-40 form, however excluding major security events). The NTD defines a safety event as a collision, derailment, fire, hazardous material spill, act of nature (Act of God), evacuation, or other safety occurrence not otherwise classified occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds.

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

APPENDIX B: ORGANIZATIONAL CHART



APPENDIX C: DEFINITIONS/ACRONYMS

Definitions

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

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

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

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

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

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

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

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

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

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

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

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

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

CM -- Construction Manager of the Regional Transit Authority.

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

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

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

Oversight Agency, or other rail transit agency, through contract or other agreement [674], including tasks required for rail compliance.
For example, contractors could handle any portion of a major construction infrastructure project, handle daily switch inspections, or monthly substation maintenance. A contractor is a third party hired by the agency to fulfill a rail compliance need. The rail transit agency may not be a contractor for the oversight agency.
COO –Chief Operating Officer
Corrective Action Plan (CAP) -- a plan developed by RTA (as a recipient and rail transit agency) that describes the actions that RTA will take to minimize, mitigate, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require RTA to develop and carry out a corrective action plan. [670, 674, SMS]
DBE -- Disadvantaged Business Enterprise.
Directive -- a formal written communication from FTA to one or more recipients which orders a recipient to take specific actions to ensure the safety of a public transportation system. [670]
EEO -- Equal Employment Opportunity.
Equivalent Authority – The Board of Commissioners of the New Orleans RTA is an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve the Safety Plan. [673, SMS]
Event – any Accident, Incident, or Occurrence. [673, 674, SMS]
FTA – the Federal Transit Administration (FTA) is an operating administration/agency within the United States Department of Transportation (USDOT). [670, 673, 674]
FMLA -- Family Medical Leave Act
FRA – the Federal Railroad Administration (FRA), an agency of the United States Department of Transportation (USDOT). [674]
Grade Crossing (as defined in the National Transit Database glossary) an intersection of roadways, railroad tracks, or dedicated transit rail tracks that run across mixed traffic situations with motor vehicles, streetcar, light rail, commuter rail, heavy rail or pedestrian traffic; either in mixed traffic or semi-exclusive situations.
Hazard – any real or potential condition that can cause injury, illness, or death; damage to or loss of a facility, equipment, rolling stock, infrastructure, property, system RTA; or damage to the local environment, or reduction of ability to perform prescribed function. [673, 674, SMS]
Hazard Analysis -- the formal activities to analyze potential consequences of hazards during operations related to provision of services. [SMS]
Hazard Identification -- formal activities to analyze potential consequences of hazards during operations related to provision of service. [SMS]
Incident – an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of RTA. [673, 674, SMS]

An incident must be reported to FTA's National Transit Database in accordance with the thresholds for reporting set forth in Appendix A to Part 674. If a rail transit agency or State Safety Oversight Agency later determines that an Incident meets the definition of *Accident* in this section, that event must be reported to the SSOA in accordance with the thresholds for notification and reporting set forth in Appendix A to Part 674. [674]
RTA has also defined Incident as an unexpected event, including security-related incidents, involving RTA passengers or employees that is not related to an accident. Incidents of significant magnitude must be reported to state and/or federal authorities. See Accident Reporting Threshold for a list of reportable incidents.
Investigation – the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk [673, 674, SMS] or investigation of an event [670].
Labor-Management Safety Committee (LMSC) – Established by SAF5, consists of a voting roster of 6 designated managers/directors and 6 representatives from the two main labor unions at RTA.
Lagging Indicators -- provide evidence, through monitoring, that intended safety management outcomes have failed or have not been achieved. [SMS]
Leading Indicators -- provide evidence, through monitoring, that key safety management actions are undertaken as planned. [SMS]
Management of Change -- a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process. [SMS]
Near miss -- a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations. [SMS]
LADOTD -- the "State of Louisiana Department of Transportation and Development" which is the designated State Safety Oversight Agency for rail fixed guideway systems in the State of Louisiana.
National Public Transportation Safety Plan (NSP) – the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53 [673, 674] or authorized at 49 U.S.C. 5329. [670]
NTSB -- the National Transportation Safety Board, an independent Federal agency. [674]
OCC -- Operations Control Center, also known as "Dispatch"
Occurrence – an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of RTA. [673, 674, SMS]
Organizational Accident -- an accident that has multiple causes involving many people operating at different levels of the respective agency. [SMS]
OCS – Overhead Catenary System.

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

before the start of passenger operation.
Safety Assurance – processes within RTA SMS that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that RTA meets or exceeds its safety objectives through the collection, analysis, and assessment of information. [673, SMS]
Safety Deficiency – a condition that is a source of hazards and/or allows the perpetuation of hazards in time. [SMS]
Safety Management Policy – RTA's documented commitment to safety, which defines RTA's safety objectives and the accountabilities and responsibilities of its employees in regard to safety. [673, SMS]
Safety Management System (SMS) – the formal, top-down, RTA-wide approach to managing safety risk and assuring the effectiveness of RTA's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks, hazards [673], and management of safety risk [625, 670, SMS].
Safety Management System Executive -- a Safety Officer or equivalent. [SMS]
Safety Promotion – a combination of training and communication of safety information to support SMS as applied to RTA's system. [673, SMS]
Safety Risk – the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome. [673, SMS]
Safety Risk Management (SRM) – a process within RTA's SMS/Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk. [673, 674, SMS]
Safety Risk Mitigation -- the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards. [SMS]
Security is defined as freedom from intentional danger for employees and passengers.
Serious injury – any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or nose); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface. [673, 674]
SIS -- the Service, Inspection, and Storage building for the RTA Canal Street and Riverfront streetcars located at the A. Philip Randolph Facility at 2817 Canal Street.
SMS Executive – a Safety Officer or an equivalent. [673]
SMS Steering Committee – established by SAF5
SRM – Safety Risk Management (see above).
SSCPP -- Safety and Security Certification Program Plan
SSCRC -- Safety and Security Certification Review Committee
State Safety Oversight Agency (SSOA; SSO) – an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674 [670, 673, 674, SMS].

TPA -- Third Party Administrator
Transit asset management (TAM) -- the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycle in order to provide safe, cost-effective, and reliable service. [625]
USDOT – United States Department of Transportation.

APPENDIX D: LIST OF SAFETY POLICIES AND STANDARD OPERATING PROCEDURES

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

ID	Title	Revision Date
004-100	Procedure for Performing Internal Safety Management Audits (ISMA)	3/1/21
004-002	Agency Safety Plan Revision	10/7/22
004-005	Accident/Incident Investigation (revision in progress)	6/15/20
004-006	Safety Assurance of Safety Critical Areas	10/20/20
004-007	On-Call Safety Representative Procedures	10/5/21
004-008	First Aid Cabinets	3/24/22
004-009	Working in Hot Weather	3/24/22
SAF1	RTA Drug and Alcohol Free Workplace Policy	2/23/21
SAF2	RTA Distracted Driving Policy	2/23/21
SAF3	RTA Safety Management Policy	6/28/22
SAF4	RTA General Accident and Injury Policy	2/23/21
SAF5	RTA Safety Committee Structure	6/28/22
SAF6	RTA Personal Protective Equipment Policy	8/24/21
	Safety and Security Certification Program Plan	6/15/17
	All Hazards Plan with Annexes	8/17/22

New Orleans Regional Transit Authority

Multi-Year Strategic Plan
for
Safety Management System Implementation

2020 – 2025

Updated: October 19, 2022

Policy Statement for Safety Management System Implementation

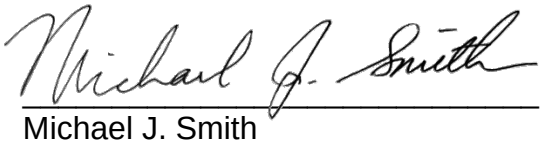
RTA is committed to improving the quality and effectiveness of its system-wide safety management programs aimed at reducing safety risk and eliminating or controlling hazards. This Safety Management System (SMS) Implementation Plan (or SIP) identifies several interrelated tasks that will help RTA achieve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

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

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

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

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



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

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

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

SMS Documentation

1. Not all required documentation is developed.
    i. Perform a document audit to establish all current documented procedures and identify gaps.
    ii. Ensure that all departments have procedures and the necessary resources to support: hazard identification, risk assessment, tracking corrective actions to closure, and monitoring of mitigations (SA), including the use of appropriate tracking logs/risk registers.
2. Documents referenced in the ASP are not reviewed regularly.
    i. Review and revise all documentation annually, including the emergency preparedness plan, rulebooks, SOPs, safety policy statement, safety performance targets, SIP, and all other documentation supporting the ASP/SMS.
    ii. RTA Policy Manual is currently in development.
3. Customer safety concerns are not always fully documented and analyzed.
    i. Ensure that all customer concerns are captured from: public meetings; customer calls and electronic communications; and face-to-face interactions with RTA employees.
    ii. Safety Department ensures this information is captured in logs/registers and elevates to ESSC or Executive-level management, as appropriate.

Safety Committee Structure

4. Executive-level ESSC not fully functional.
    i. Re-establish the ESSC under a revised SOP/Charter to focus on SMS objectives, priority accidents/hazards, and other business based on safety criticality.
    ii. Establish a new hierarchy and reporting structure between the ESSC and Departmental Safety Committees (DSCs).

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

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

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

    ii. Incorporate safety objectives into meeting agenda.

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

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

    ii. Invite ATU Local 1560 to DSCs as appropriate.

    iii. Provide baseline SMS training to DSCs.

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

Safety Assurance Activities

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

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

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

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

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

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

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

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

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

2. major facility changes, additions or rehabilitation

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

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

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

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

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

Employee Safety Reporting Program

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

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

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

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

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

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

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

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

Communication of Safety Information

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

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

Training

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

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

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

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

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

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

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

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

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

Miscellaneous

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

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

16. RTA needs a revised Drug & Alcohol Program

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

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

    i. Integrate ferry operations into RTA's SMS.

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

Implementation Plan (Updated)

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
SMS Documentation	Perform a document audit to establish all current documented procedures and identify gaps.	Office of Internal Audit & Compliance is developing an SOP catalogue. HCWD has shared all Board-approved company policies and requires employees to sign, acknowledging receipt. Two sets of company policies have been approved, to date, Feb. and July 2021.	Ensure that all departments have procedures and the necessary resources to support: hazard identification, risk assessment, tracking corrective actions to closure, and monitoring of mitigations (SA), including the use of appropriate tracking logs/risk registers.	A Safety on-call technical consultant will commence work in 2023 to support a gap analysis of department documentation. This will augment prior analysis from the Office of Internal Audit and Compliance (OIAC).
	RTA Policy Manual is currently in development.	Complete	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.	Complete. Emergency preparedness plan (All Hazards Plan) is complete. Operations Manual/ Rulebook is complete and currently being distributed. All rules, SOPs, and other documents will be reviewed annually.
			Ensure that all customer concerns are captured from: public meetings; customer calls and electronic communications; and	New Hazard Report form has been implemented. Vorex helpdesk application is live. Revised SRM section of ASP to indicate that public Board

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
			face-to-face interactions with RTA employees.	meetings will be reviewed for hazards/concerns.
			Safety Department ensures this information is captured in logs/registers and elevates to ESSC or Executive-level management, as appropriate.	Complete
Safety Committee Structure	Re-establish the ESSC under a revised SOP/Charter to focus on SMS objectives, priority accidents/hazards, and other business based on safety criticality.	Complete	Ensure that all departments appropriately elevate identified hazards and safety concerns to the ESSC's attention, in consultation with the Safety Department.	ESSC members were briefed on roles and expectations, including the responsibility to elevate hazards and safety concerns. SMS 101 training is also being rolled out to all employees.
	Establish a new hierarchy and reporting structure between the ESSC and Departmental Safety Committees (DSCs).	Complete; additional DSCs in development.	Well-managed DSCs will ensure two-way communication related to hazards, safety concerns, and safety programs, and will encourage participation in SRM and SA processes.	Will continue to push through DSCs 1-on-1.
	Educate the ESSC on the current Safety Management Policy Statement and their roles	Complete	Task the Safety Department with providing technical assistance to DSCs as	Complete; DSC guidelines distributed; Safety attends DSC meetings regularly.

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	and responsibilities related to key safety objectives.		necessary to ensure effectiveness.	
	Incorporate safety objectives into meeting agenda.	Complete		
	Invite ATU Local 1560 to DSCs as appropriate.	Complete; Note: Also new LMSC has since been created.		
	Provide baseline SMS training to DSCs.	CBT version of SMS 101 course currently in development. DSC leadership will be among first groups targeted to receive the training.		
Safety Assurance Activities	Establish Management of Change process including roles and responsibilities for all departments and elevation to the ESSC as necessary.	Complete; See SAF5	Establish process whereby Safety Department leads SA activities and concerns are elevated to the ESSC as necessary.	SA SOP for Safety has been finalized and is being implemented. Safety is also conducting remote operator evaluations.
	Finalize and document in the M of C process, all major changes that must be assessed through SRM:…	Complete	Distribute SA findings through the Safety Committees and other means.	SA findings will be incorporated into ESSC.

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
		An SOP working group		SMS Implementation will be the main discussion point in SMS sterring committee meetings as well as the Labor Safety Committee meetings. Targeting October 2022 for the first meetings for both; working with Ops on add'l methods for sharing real-time ride check and rule compliance results, such as a cloud-based tool.
	Prepare a document map to ensure that all changes in the organization are reflected in all critical documentation.		Ensure that all corrective actions for ineffective mitigations identified through the SA process are fully documented.	
	Develop and implement training on the new A/I Investigation procedure as appropriate.	Draft A/I SOP is currently near completion. Comprehensive training will roll-out in next 1-2 months, to include presentation, new form packet, and a workshop on quality report-writing.		
Employee Safety Reporting Program	Implement the program as described in the ASP. Provide regular updates to the Executive-level management and the ESSC.	Complete		
	Revise and finalize an official hazard-/unsafe behavior-reporting form.	Complete		

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

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
Communication of Safety Information	Ensure that all hazard identification, assessment, and mitigation activities are led by the Safety Department and are properly documented, tracked and shared, through Safety Committees, newsletters, bulletins, and other means.	Complete		
Training	Centralize management of training; use a matrix for monitoring compliance with program requirements.	Complete	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.	New training policies and plans are in development in Operations Training.
	Develop Training Plan (to be maintained by the CSEM and provided to SSO/FTA by request).	CSEM maintains the PTSCTP training plan for Key SMS personnel. T3 Safety team members are fully PTSCTP-certified. RTA was approved for 3 classes on-site next Fiscal Year.	The training policy needs to include specific requirements and monitoring activities for contractor safety training.	Team is working on incorporating training requirements in Safety's review of upcoming procurements, focusing on long-term contracts and capital projects.

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Establish 3-year plan for engaging external training providers, including TSI, NSC, and others.	See above re: TSI. CSEM is requesting additional courses. A 3-year plan is under development.	Develop and provide biennial refresher training after completion of initial requirements per 49 CFR Part 672, which must require one hour of safety oversight training.	Complete
Miscellaneous	Participate in ferry operator-led safety meetings; hold joint meetings	Complete	Ensure that exercises (e.g., full-scale, tabletop) are held annually, both internally and with external agencies.	New exercise plan is under ELT review; will include 2 exercises per year. Also will be carried out in close coordination with the Security team.
	Drug & Alcohol Program is in development and will be aligned with organizational structure changes, effective October 1, 2020.	Complete	Integrate ferry operations into RTA's SMS.	Not applicable

APPENDIX F: REQUIRED APPROVALS

The LMSC, comprised of 50% labor and 50% RTA management, pursuant to the statutory requirements in Title 49 U.S.C. Section 5329(d) as amended by the Bipartisan Infrastructure Law, subsections (1)(A) and (5)(A), reviewed, and considered the approval of, the draft ASP during its regular, quarterly meeting on **October 19th, 2022**. Subsequently, the members were asked to cast votes of approval or disapproval via Microsoft Forms no later than **October 31st, 2022**. Below is a summary table of the final approval vote. All Committee proceedings were conducted in accordance with RTA Safety Committee Policy (SAF5). The ASP was approved by the LMSC by simple majority as of **October 31st, 2022**.

ID	Start time	Completion time	Email	Name	Please enter your name (First Last):	Do you approve the draft 2023 ASP with the highlighted edits?	Notes
1	10/24/22 10:23:29	10/24/22 10:23:41	anonymous			Approve	
2	10/24/22 10:48:02	10/24/22 10:48:45	anonymous		Darius Hollins	Approve	Member
3	10/24/22 10:52:12	10/24/22 10:52:20	anonymous		Craig Toomey	Approve	
4	10/24/22 11:07:48	10/24/22 11:08:04	anonymous		KoryDupree	Approve	Member
5	10/24/22 11:17:21	10/24/22 11:18:12	anonymous		Darwyn Anderson	Approve	
6	10/24/22 14:55:30	10/24/22 14:55:48	anonymous		MARC POPKIN	Approve	
7	10/24/22 14:55:34	10/24/22 14:56:59	anonymous		Brandon Mason	Approve	
8	10/24/22 16:46:18	10/24/22 16:46:34	anonymous		Robert Hickman	Approve	
9	10/25/22 10:54:35	10/25/22 10:55:38	anonymous		Darius Hollins	Approve	Member
10	10/27/22 7:22:29	10/27/22 7:22:39	anonymous		Floyd Bailey	Approve	Member
11	10/27/22 9:18:12	10/27/22 9:18:24	anonymous		Floyd Bailey Jr	Approve	(Duplicate)
12	10/28/22 9:59:27	10/28/22 10:01:08	anonymous		Korrie Mapp	Approve	Member
13	10/28/22 10:06:27	10/28/22 10:06:51	anonymous		Darwin Griffin	Approve	
14	10/30/22 20:55:47	10/30/22 20:56:03	anonymous		Kentrella Crawford	Approve	Member
15	10/31/22 11:20:19	10/31/22 11:20:43	anonymous		Darian	Approve	Member

PLACEHOLDER – WILL REPLACE THE FOLLOWING WITH BOARD RESOLUTION

Regional Transit Authority
2817 Canal Street
New Orleans, LA 70119-6301

504.827.8300

www.norta.com

RESOLUTION NO. 22-004

STATE OF LOUISIANA

PARISH OF ORLEANS

APPROVAL OF 2022 RTA AGENCY SAFETY PLAN

Introduced by Commissioner Raymond seconded by Commissioner Wegner.

WHEREAS, the Board of Commissioners of the Regional Transit Authority (RTA) previously approved its Agency Safety Plan (ASP) on July 28th, 2020, and first revision thereof on March 23rd, 2021; and

WHEREAS, the Public Transportation Agency Safety Plan (PTASP) final rule (49 Code of Federal Regulations ["CFR"] Part 673) requires operators of public transportation systems that are recipients of Federal Transit Administration (FTA) funds, such as RTA, to develop and implement a compliant Public Transportation Agency Safety Plan; and

WHEREAS, 49 CFR Part 673 requires that subsequent updates to the ASP be signed by the agency's Accountable Executive and approved by the agency's Board of Directors, or equivalent authority; and

WHEREAS, the Louisiana Department of Transportation and Development (LADOTD) is designated by the State of Louisiana and certified by FTA to conduct safety oversight of RTA, under 49 CFR Part 674; and

WHEREAS, the LADOTD reviewed and tentatively approved the ASP; and

WHEREAS, the updated ASP meets or exceeds FTA requirements under 49 CFR Parts 673 and 674 for such plans and incorporates the progress the agency has made toward the implementation of a viable Safety Management System (SMS) which is required by FTA; and

WHEREAS, the updated ASP was jointly reviewed and developed by staff as part of its continued effort to promote and advance the RTA SMS in accordance with all State and Federal requirements.

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the RTA that the 2022 RTA Agency Safety Plan, as revised and recommended by staff, is hereby approved.

THE FOREGOING WAS READ IN FULL, THE ROLL WAS CALLED ON THE ADOPTION THEREOF AND RESULTED AS FOLLOWS:

YEAS:	**8**
NAYS:	**0**
ABSTAIN:	**0**
ABSENT:	**0**

AND THE RESOLUTION WAS ADOPTED ON THE 25th DAY OF JANUARY, 2022.

Flozell Daniels Jr.

FLOZELL DANIELS, JR.
CHAIRMAN
BOARD OF COMMISSIONERS