



TRI DELTA TRANSIT

Eastern Contra Costa Transit Authority
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APPENDIX C

Agenda Item 7d Safety Plan

Board of Directors Meeting

Wednesday September 28, 2022

Eastern Contra Costa Transit Authority (Tri Delta Transit) Safety Plan



Revised September 2022

Contact Information:
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(ECCTA)- Recipient ID 5617

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Eastern Contra Costa Transit Authority (Tri Delta Transit) Safety Plan

1. Transit Agency Information

Transit Agency Name	Eastern Contra Costa Transit Authority (ECCTA) doing business as Tri Delta Transit		
Transit Agency Address	801 Wilbur Avenue, Antioch, CA 94509		
Name and Title of Accountable Executive	Rashidi Barnes, Chief Executive Officer (CEO)		
Name of SMS Executive	Tania Babcock, SMS Executive		
Mode of Service Covered by This Plan	Fixed Route Bus; Non-Fixed Route Bus	List All FTA Funding Types	5307,5339,JARC,Lifeline
Mode of Service Provided by the Transit Agency	ECCTA contracts with First Transit to operate fixed route and ADA/paratransit bus service. ECCTA operates 17 local bus routes on weekdays, 6 local bus routes on weekends and holidays, on-demand shuttle service on weekdays, and ADA/paratransit bus service on weekdays and weekends. ECCTA provides the vehicles, maintenance, and administration staff. First Transit provides the operations staff.		
Does the Agency Provide Transit Services on Behalf of Another Transit Agency or Entity?	Yes X	No <input type="checkbox"/>	Description of Arrangement Early bird service
Name and Address of Transit Agency or Entity for Which Service Is Provided	Bay Area Rapid Transit (BART) 300 Lakeside Drive Oakland, CA 94612		

2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	ECCTA			
Signature by the Accountable Executive	Signature of Accountable Executive		Date of Signature	
	 Rashidi Barnes, CEO		9/21/2022	
Approval by the Safety Committee	Name of Entity That Approved This Plan		Date of Approval	
	Safety Solutions Team		8/10/2022	
Approval by the Board of Directors	Name of Entity That Approved This Plan		Date of Approval	
	ECCTA Board of Directors		9/28/2022	
	Relevant Documentation (title and location)			
	Resolution #220928D Eastern Contra Costa Transit Authority (Tri Delta Transit) Safety Plan; Located in ECCTA CEO's office at 801 Wilbur Avenue, Antioch, CA 94509			
Certification of Compliance	Name of Individual That Certified This Plan		Date of Certification	
	Rashidi Barnes, CEO		2022; annual certification	
	Relevant Documentation (title and location)			
	Certifications and Assurances for ECCTA submitted in TrAMS (www.transit.dot.gov/trams)- category 08- Public Transportation Agency Safety Plan. ECCTA's Safety Plan addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.			
Version Number and Updates				
Version Number	Section/Pages Affected	Reason for Change	Date Issued	Resolution
1	N/A	Initial release of Safety Plan	12/11/2019	#191211F
2	All Sections	Updated plan at annual review	9/23/2020	#200923B
3	All Sections	Updated plan at annual review	9/22/2021	#210922B

4	All Sections	Updated plan for Bipartisan Infrastructure Law of 11/15/2021	9/28/2022	#220928D

Annual Review and Update of the Public Transportation Agency Safety Plan

The Safety Plan is a "living document" and must address issues associated with system safety on a timely and proactive basis. The Safety Plan will be updated at any point when ECCTA determines that its SMS approach to safety has identified a need for change. In addition, an annual review of the Safety Plan will be conducted by the Accountable Executive, SMS Executive, agency leadership/executive management, and Safety Solutions Team by July 31. During the annual review, if changes are needed, ECCTA will revise the Safety Plan and training to reflect the changes. The Accountable Executive will approve the revised Safety Plan. The Safety Plan will be presented to ECCTA's Safety Committee, the Safety Solutions Team, for approval and then presented to the Board of Directors for approval. ECCTA's Accountable Executive annually certifies SMS compliance with 49 C.F.R. Part 673.

3. Safety Performance Targets

Safety Performance Targets				
<i>Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.</i>				
	Safety Performance Measure	Agency Definition	Total Number Per Fiscal Year	Rate Per Total Vehicle Revenue Miles Per Fiscal Year
Mode of Transit Service: Fixed Route Bus	Relevant Documentation (title and location): Resolution #200923A Objectives, Measures, and Standards, Productivity Guidelines. Located in ECCTA CEO's office at 801 Wilbur Avenue, Antioch, CA 94509			FY 18/19 Total Vehicle Revenue Miles 1,937,713
	Fatalities	Death confirmed within 30 days.	0	0
	Injuries	Harm to person that requires immediate medical attention away from the scene.	3	.0000015
	Safety Events	Safety Events: Collisions, Fires, Derailments, Hazardous Material Spills, Acts of God, Other Safety Events (events that do not fall into any of the other categories, yet meet a reporting threshold other than immediate transport for medical attention for one person).	28	.0000144
	System Reliability	Miles between road calls (major mechanical failure).	50,000	N/A
Mode of Transit Service: Non-Fixed Route Bus	Safety Performance Measure	Agency Definition	Total Number Per Fiscal Year	Rate Per Total Vehicle Revenue Miles Per Fiscal Year
				FY 18/19 Total Vehicle Revenue Miles 647,360
	Fatalities	Death confirmed within 30 days.	0	0
	Injuries	Harm to person that requires immediate medical attention away from the scene.	2	.000003
	Safety Events	Safety Events: Collisions, Fires, Derailments, Hazardous Material Spills, Acts of God, Other Safety Events (events that do not fall into any of the other categories, yet meet a reporting threshold other than immediate transport for medical attention for one person).	5	.0000077
	System Reliability	Miles between road calls (major mechanical failure).	100,000	N/A

Due to the temporary reduction in service during the COVID-19 pandemic, then adjustment in service due to the approved system redesign implemented September 12, 2022, ECCTA did not make any adjustments to the Safety Performance Targets at the 2022 annual review. ECCTA's FY 22/23 total vehicle revenue miles are expected to similarly match FY 18/19 total vehicle revenue miles.

ECCTA reviewed data for fatalities, injuries, and safety events for FY 17/18, FY 18/19 and FY 19/20 and established the safety performance targets by averaging the data for each safety performance measure. The total number and rate for safety performance targets in the charts are provided as annual fiscal year targets. The rate is based on total vehicle revenue miles for the fiscal year FY 18/19.

Safety Performance Target Coordination		
<p>ECCTA will transmit safety performance targets to Caltrans Division of Rail and Mass Transit (Caltrans) and to Metropolitan Transportation Commission (MTC). Safety performance targets will be transmitted to Caltrans and to MTC after the annual review of the Safety Plan. The targets will be transmitted annually by September 30. FTA requires ECCTA to coordinate with Caltrans and MTC to the maximum extent practicable. Safety performance targets will be transmitted to help Caltrans and MTC with the planning process for the future and for developing investment priorities for upcoming transit projects. Caltrans conducts coordination meetings with ECCTA for the selection of State and MPO safety performance targets and goals.</p>		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Caltrans (Transmitted in writing to Safety Management System contact: Brian Travis: brian.travis@dot.ca.gov)	Annually by September 30
Targets Transmitted to the Metropolitan Planning Organization	Metropolitan Planning Organization Name	Date Targets Transmitted
	MTC (Transmitted in writing to Transit Asset Management contact: Shruti Hari: shari@bayareametro.gov)	Annually by September 30

4. Safety Management Policy

Safety Management Policy Statement

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

Safety is ECCTA's first priority. ECCTA is committed to implementing, developing, and improving strategies, management systems, and processes to ensure that all our activities uphold the highest level of safety performance and meet required safety standards.

We will develop and embed a safety culture in all our activities that recognize the importance and value of effective safety management and acknowledges at all times that safety is paramount.

We will clearly explain for all staff their accountabilities and responsibilities for the development and operation of the Safety Management System.

For passengers and employees, we will minimize the safety risk associated with transit service to as low as reasonably practicable and we will work to comply with and, wherever possible, exceed legislative and regulatory requirements and standards. We also will work to ensure that all employees are provided with adequate and appropriate safety information and training, are competent in safety matters, and are only allocated tasks commensurate with their skills.

We have established safety performance targets to help us measure the overall effectiveness of our processes. We will review our adherence to our Safety Plan annually to identify how well we met our safety performance targets.

Safety Management Policy Communication

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

ECCTA's Safety Management Policy Statement is communicated to all employees, contract employees and the Board of Directors. The statement is posted on the communication board near the maintenance computer station, on the safety communication board in the driver's room, and on the communication board in the administration break room. The statement is reviewed annually with contract employees at an operations safety meeting. The statement is reviewed with ECCTA employees at the annual "Hazard Communication" maintenance and administration safety training class, at the "Safety Management System and De-escalation" training class every two years, and upon hire at employee orientation. The statement is communicated to the Board of Directors after the annual review of the Safety Plan, when any changes are made to the Safety Plan.

Authorities, Accountabilities, and Responsibilities

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

<p>Accountable Executive</p>	<p>The CEO is the Accountable Executive. The Accountable Executive meets all the requirements in §673.5 and §673.23(d)(1) in that this position is ultimately responsible for:</p> <ul style="list-style-type: none"> • Carrying out the Safety Plan and the Transit Asset Management (TAM) Plan, • Controlling or directing the human and capital resources needed to develop and maintain the Safety Plan and the TAM Plan, and • Ensuring that ECCTA's SMS is effectively implemented, and action is taken, as necessary, to address substandard performance in ECCTA's SMS. <p>Roles include:</p> <ul style="list-style-type: none"> • Decision-making about resources to support asset management, SMS activities, and capital investments • Annually certifying SMS compliance with 49 C.F.R. Part 673 • Communicating the Safety Management Policy Statement to ECCTA's Board of Directors and throughout the agency • Endorsing SMS implementation team and SMS processes • Providing guidance to the Safety Solutions Team on recommended SMS actions/SMS agency decision making
<p>SMS Executive</p>	<p>The SMS Executive reports directly to the Accountable Executive as shown in the organizational chart. The SMS Executive received training from the US Department of Transportation on SMS Awareness, Safety Assurance, and SMS Principles for Transit. The SMS Executive participated in the US Department of Transportation Federal Transit Administration Public Transportation Agency Safety Plan Workshop and regularly participates in webinars. The SMS Executive also received training from the National Transit Institute for a Train-the-Trainer course in Violence in the Transit Workplace- Prevention, Response, and Recovery. The SMS Executive has the authority and responsibility for implementation and operation of ECCTA's SMS.</p> <p>Roles include:</p> <ul style="list-style-type: none"> • Developing and maintaining SMS documentation • Directing safety risk management activities • Briefing the Accountable Executive on SMS • Assisting with safety management training • Reviewing the agency Safety Plan on an annual basis with the Accountable Executive, agency leadership/executive management, and Safety Solutions Team • Transmitting safety performance targets to Caltrans and to MTC on an annual basis • Ensuring the Safety Management Policy Statement is communicated throughout the agency
<p>Agency Leadership and Executive Management</p>	<p>Other members of ECCTA's leadership and executive management with authority and responsibility for implementation and operation of the agency's SMS include:</p>

	<ul style="list-style-type: none"> • Chief Operating Officer (COO) <ul style="list-style-type: none"> ○ Assisting with identification of safety concerns and hazards ○ Assessing and mitigating risk through safety risk management ○ SMS agency decision making • Contract General Manager <ul style="list-style-type: none"> ○ Assisting with identification of safety concerns and hazards ○ Assessing and mitigating risk through safety risk management ○ Overseeing contract employee safety reporting program for operations employees; communicating program to contract employees ○ Ensuring each accident/injury is investigated and documented ○ Ensuring provision of adequate and appropriate occupational safety and health training for contract employees ○ Ensuring that safety devices are properly maintained and available and that contract employees are properly trained in their use ○ Ensuring that operations safety communication boards are updated and that required SMS communication is posted • Director of Maintenance <ul style="list-style-type: none"> ○ Assisting with identification of safety concerns and hazards ○ Assessing and mitigating risk through safety risk management ○ Ensuring that safety devices are properly maintained and available and that ECCTA employees are properly trained in their use ○ Ensuring the maintenance safety communication board is updated and that required SMS communication is posted • Manager of Administrative Services <ul style="list-style-type: none"> ○ Assisting with identification of safety concerns and hazards ○ Assessing and mitigating risk through safety risk management ○ Communicating ECCTA employee safety reporting program to administrative and maintenance employees ○ Ensuring provision of adequate and appropriate occupational safety and health training for ECCTA employees ○ Ensuring that safety devices are properly maintained and available and that ECCTA employees are properly trained in their use ○ Ensuring the administration safety communication board is updated and that required SMS communication is posted
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<ul style="list-style-type: none"> • Key Staff 	<p>Safety Committee: Safety Solutions Team (SST)- The SMS Executive facilitates the SST meetings, with the Safety Manager as the alternate facilitator. SST membership includes: Chief Operating Officer (alternate Accessible Services Manager), Contract General Manager (alternate Contract Assistant General Manager), Safety Manager (alternate Assistant Safety Manager), Director of Maintenance (alternate Facilities Manager), Manager of Administrative Services (alternate Special Project Analyst), a Mechanic (with alternate), and four Bus Operators (with alternates) selected by the labor organization representing the Bus Operators. The SST is a key element to ensure the safety of employees, customers, contractors and the public. SST members discuss identified hazards, assess and mitigate risk through safety risk management, and then communicate follow up information on identified hazards reported through the employee safety reporting programs in posted SST minutes. SST members also discuss mitigations or strategies that may be ineffective, inappropriate, or not implemented as intended and assist in identifying safety deficiencies for continuous improvement. The SST reviews and approves the Safety Plan prior to approval by the Board of Directors. The SMS Executive will communicate with the Accountable Executive regarding SST deliberations, decisions and recommendations as needed. SST meetings are scheduled for the second week of the month. The Safety Manager maintains the meeting minutes.</p> <p>As part of ECCTA's risk reduction program, the SST is responsible for assisting with mitigation of assaults on transit workers by performing a risk analysis on the deployment of assault mitigation infrastructure and technology on buses. The SST reviewed National Transit Database transit worker assault data from January 2020- April 2022, when driver barriers were installed on revenue vehicles. Technology on board revenue vehicles during the time period monitored included cameras, in-cab video technology, radio communication and a panic button with AVL headsign message. ECCTA had one transit worker assault reported in the National Transit Database. The SST performed a risk analysis on the deployment of assault mitigation infrastructure and technology on buses to determine the risk assessment. For additional mitigation, a 10 code was created and operations employees were trained on using the 10 code. The SST will continue to monitor transit worker assault data and the deployment of assault mitigation infrastructure and technology on buses.</p> <p>Each Employee will:</p> <ul style="list-style-type: none"> • Be an active participant in the safety and health program • Perform all tasks in accordance with established policies, procedures and safe work practices • Perform a safety evaluation of his/her workspace daily • Inspect all tools and equipment prior to use to identify any hazards • Report any unsafe or unhealthy practice or condition and act to correct the condition if it is safe and the employee has the authority and ability to do so • Report any injuries, illnesses, incidents or accidents to the appropriate person
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Employee Safety Reporting Program

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

Safety is a core value at ECCTA. ECCTA is committed to providing a safe work environment for employees. Employees are the eyes and ears of the organization and a source of safety management information for ECCTA. Any employee discovering an unsafe condition is expected to eliminate the situation if it is safe for them to do so and within their authorization to act. Imminent hazards that may be life threatening or cause serious injury must be immediately reported to a supervisor. Any employee who has the authority and ability to abate and/or resolve a hazard safely should do so until the issue is fully resolved. For injury prevention and hazard identification, ECCTA and the operations contractor, First Transit, have established various employee safety reporting programs.

Operations

Near Miss and Hazard Reporting

ECCTA contracts with First Transit to operate ECCTA's demand response and fixed route bus service. Each contract employee is issued a Near Miss and Hazard Reporting pad to document and report safety, route, and security concerns. Contract employees are asked to report anything they determine to be a hazard. Each contract employee is also encouraged to report any near miss incidents and hazards. For near miss and hazard reporting purposes, First Transit defines a near miss as "an event you witnessed where no harm was caused, but there was the potential to cause injury or ill health; a dangerous occurrence." And hazard is defined as "anything that may cause harm in the near future." In addition to each contract employee being issued a Near Miss and Hazard Reporting pad, the reporting pads are also located in the driver's room, next to the safety suggestion box. Contract employees may choose to identify themselves by name or to provide an anonymous report. The program functions as follows:

- 1) If the safety or security hazard requires immediate attention, dispatch is notified immediately. If immediate attention is not required, the contract employee is encouraged to submit the information to management by the end of their workday. The contract employee completes the Near Miss and Hazard Reporting form and gives the form to management or places the form in the safety suggestion box located in the driver's room.
- 2) Safety Manager reviews the report, meets with contract employee if necessary, and has the authority to take immediate and appropriate action to correct the hazardous conditions or unsafe work practices and procedures, and to establish rules of safety as soon as they are identified. If necessary, assistance may be obtained through First Transit's Region Safety Manager.
- 3) For hazards that cannot be immediately corrected due to reasons such as the availability of needed equipment, materials and/or personnel; time for delivery, installation, modification, or construction; training periods; etc., protection shall be provided in the interim to employees who need it while correction of hazard is proceeding.
- 4) Safety Manager records an identified hazard in ECCTA's Systems Hazards electronic database. The reported information is shared with the Safety Solutions Team (SST), where the information is reviewed, addressed and documented. Safety concerns reported through the contract employee safety reporting program will include follow up with the contract employee by First Transit. In addition, identified hazards receive follow up through posted SST minutes.
- 5) Positive reinforcement and recognition are given to contract employees who demonstrate correct procedures and actions through Near Miss and Hazard Reporting. In addition, one winner is randomly selected from all reports at each safety meeting held

once a month. Each winner receives a \$25 gift card.

Tri Delta Watch app

Tri Delta Watch is a free downloadable app with an Employee Safety Reporting Program (ESRP) component. Contract employees may report safety concerns and hazards through the ESRP in the app. To report a safety concern or hazard in the Tri Delta Watch app, the contract employee will:

- 1) Download the free Tri Delta Watch app
- 2) In settings toggle "employee"
- 3) Enter ORG group code "TDT"
- 4) Select Report Type
- 5) Select ESRP
- 6) Select the category for the safety concern
- 7) If it is safe to do so, attach an image, report the location, and information on the safety concern

The Chief Operating Officer or Manager of Marketing and Customer Service will review the submitted ESRP and forward to the appropriate manager to review and address the safety concern. If an identified hazard is reported through the ESRP, the hazard information is recorded in ECCTA's Systems Hazards electronic database. The reported hazard is shared with the Safety Solutions Team (SST), where the information is reviewed, addressed and documented. Safety concerns reported through the ESRP will include a follow up message to the employee. In addition, identified hazards receive follow up through posted SST minutes.

Threatening or Suspicious Activity

First Transit encourages anyone who sees, hears, or learns of any conduct or statement that seems threatening or suspicious, and/or any weapons on company premises or in company vehicles, to immediately report such conduct or statement, either to his/her Supervisor or Manager, to the Human Resources Department, FirstGroup America Security, and/or to the confidential Ethics and Compliance Hotline at 1.877.3CALLFG, (1.877.322.5534), contact the Hotline intake site at ethicsfirst.ethicspoint.com, or email Compliance@firstgroup.com.

If there is an immediate risk or imminent threat of violence, serious harm, or life-threatening conduct, employees should immediately call 911, local police, or other law enforcement.

The "Near Miss and Hazard Reporting" form and Tri Delta Watch app are shown in Appendix A.

The following information is from *First Transit's Safety Plan "Employee Safety Reporting Program"*, pages 16-24 and applies to contract employees.

Conditions that protect a reporting employee from discipline or enforcement action
Retaliation against anyone who, in good faith, reports observations of unsafe or illegal activities; or who cooperates in any investigation of such report, is strictly prohibited and is not tolerated, regardless of the outcome of the complaint.

In other words, employees are protected for speaking up in good faith under this Policy. Any manager, or co-worker who retaliates against a complaining employee or anyone involved in an investigation of a complaint is subject to discipline and/or termination.

Managers are charged with assuring that they and their staff comply with the whistleblower protections and that no retaliation occurs because of a reported safety related issue.

Possible Disciplinary Actions

At First Transit reporting unsafe practices, policy violations, violations of the law, etc. is encouraged, and in some instances required, of all employees. The primary goal is to be able to identify areas where risk of injury to personnel or customers, or destruction of property may exist; and develop measures to mitigate those risks.

Unless the employee's action or in-action is egregious, disciplinary action is not warranted.

Employees that fail to report mandatory items, such as:

- Failure to report defective equipment
- Failure to report a safety hazard
- Failure to procure necessary information for an accident report or
- Submitting an inaccurate or incomplete report

that could lead to serious harm, are subjected to the disciplinary process describe later in this section.

Duty to Report Wrongdoing

First Transit is committed to investigating all good faith claims of wrongdoing so that corrective action may be taken. To that purpose, First Transit encourages any employee, contractor or vendor to report wrongdoing or illegal acts to location management so long as they are not believed to be involved in the fraud, waste or abuse being reported. Management within First Transit ensures the matter is reported to Group Security and First Transit will investigate and take appropriate steps to correct the wrongdoing or potential violation.

Alternatively, reports may be made anonymously using the FGA Ethics & Compliance line at 1.877.3CALLFG, (1.877.322.5534) or by emailing Compliance@firstgroup.com. You may also contact the Healthcare Compliance Officer directly.

Self-Reporting

Self-reporting is also encouraged. Anyone who reports his/her own violation will receive due consideration regarding disciplinary action that may be taken.

Open-Door Policy

A workplace where employees are treated with respect and one that is responsive to their concerns is important to each of us. First Transit recognizes that employees may have suggestions for improving our workplace, as well as complaints about the workplace. We feel that the most satisfactory solution to a job-related problem or concern is usually reached through a prompt discussion with an employee's manager. Each employee is encouraged to do so.

If the matter cannot be resolved with one's immediate manager, the employee may:

- Speak with their Location General Manager or Region Safety Manager who will attempt to facilitate a solution.
- If an employee is unable to resolve the matter through the management chain of command in their location, the employee may choose to speak directly to anyone in

division management or Human Resources.

First Transit's Open-Door Policy also allows employees to voice their concerns anonymously.

- If an employee would like to submit an anonymous concern, they may contact the Ethics and Compliance Toll-free Hotline at 1.877.3CALLFG, (1.877.322.5534), contacting the Hotline intake site at ethicsfirst.ethicspoint.com, or emailing Compliance@firstgroup.com.

This Open-Door Policy applies to every employee not covered by a collective bargaining agreement. It also extends to contractors and subcontractors.

In situations involving discrimination or harassment, employees should follow the Complaint Procedure described in the Discrimination, Harassment and Retaliation Reporting Procedure section of their First Transit Employee Handbook without fear of reprisal and should not follow this Open-Door Policy complaint process.

In situations requiring immediate attention, an employee may bypass the chain of command, which begins with his or her manager, and contact any level of management or Human Resources directly, without fear of reprisal, and without the need to follow this Open-Door Policy complaint process.

- This may be done in person, by direct contact, phone call, letter, or email message or by utilizing the Ethics and Compliance Hotline. The Ethics and Compliance Hotline can be reached by calling 1.877.3CALLFG, (1.877.322.5534) or emailing Compliance@firstgroup.com.

Employees are REQUIRED to report the following. Failure to do so WILL lead to disciplinary action.

Accidents/Incidents

First Transit finds accidents and incidents to be a very serious matter and a valuable learning opportunity to improve safety. **SOP #700 – Accident & Safety Data Acquisition and Reporting**, and the supporting SOP's, **700a – Auto and General Liability Claim Form; 700b – Courtesy Card; 700c – Operator Incident Report**; ensure that the appropriate actions happen at the scene for the safety and security of First Transit passengers and employees; and that the appropriate data is collected to evaluate the incident, determine culpability; and develop actions to limit or eliminate the possibility of the incident occurring in the future.

Accidents

Accidents are considered to be any collision that occurs while an Operator is on duty. Operators are to report all accidents and collisions to Dispatch immediately upon occurrence. When reporting to Dispatch, the employee must state that he or she is reporting an accident and then answer any questions asked by Dispatch.

Additionally, **SOP #700c – Operator Incident Report** and **SOP #700a – Auto & General Liability Claim Form**, must be completed by the Operator involved and location management for accidents, possible claims of accidents, damage to equipment, injury and possible injury not later than one hour after completion of shift on the day of occurrence. Any vehicle defects that may have contributed to an accident shall be included in the report. To help ensure that this deadline is met, employees are paid to complete the form.

Employees who fail to report an accident may be subject to disciplinary action up to and including termination.

Employees must provide transit management with any additional accident information immediately upon request.

Incidents

Incidents with passengers involving slips and falls on or near the vehicle, fights, police action, or removal of a passenger, must be reported to Dispatch immediately; and require a **SOP #700a – Auto & General Liability Claim Form** to be completed by management before going off duty for the workday.

All other incidents and occurrences out of the norm, no matter how slight, are to be reported to Dispatch upon return to the yard.

The following are examples of incidents that must be reported:

- Broken or cracked windows from unknown causes,
- Cut seats,
- Service delays,
- Passing up passengers,
- Insufficient or excessive running time in schedule,
- Overloads, etc.

If in doubt, immediately contact Dispatch.

Operators Witnessing an Accident shall notify Dispatch immediately, even though their vehicle may not be involved.

Required Courtesy Cards

In the event of an accident or an incident, Operators must distribute **SOP #700b – Courtesy Cards** then retrieve as many as possible from passengers and persons in the immediate area of the accident or incident who may have witnessed the event.

Duty to Report Law Enforcement Actions

Employees are required to report any arrests, indictments or convictions to their immediate manager or Human Resources immediately, but no later than prior to the next scheduled work shift, to the extent permitted by applicable law. If the circumstances and the offense charged, in our judgment, present a potential risk to the safety and/or security of our customers, employees, premises and/or property, such events may result in disciplinary or other appropriate action to the extent permitted by applicable law.

Operators and safety sensitive employees are required to report all Driving Under the Influence (DUI) or Driving While Intoxicated (DWI) related charges, vehicular collisions, and any moving violation citations received in any vehicle immediately if possible, but no later than prior to their next scheduled work shift, consistent with applicable law.

Possible Disciplinary Actions

First Transit uses a tiered approach to determine possible disciplinary actions. Infractions that lead to disciplinary action are categorized into four categories;

- Class 1 – Dischargeable Offenses, the most serious and unacceptable behavior
- Class 2 – Serious violations of the First Transit performance code
- Class 3 – Secondary violations of the First Transit performance code
- Class 4 – Lesser violations of the First Transit performance code that may result in disciplinary action depending on the circumstances or repeated violations

Examples of **Class 1 Dischargeable Offenses** include:

- Convictions and imprisonment for such offenses as DUI, DWI, child abuse, etc.
- Safety; some offenses are of such a serious nature that termination is appropriate for the

first offense. Those include but are not limited to:

- Failure to properly secure mobility devices
 - Cell phone use while operating a company vehicle
 - Striking a pedestrian
 - Colliding into the rear of another vehicle or stationary object
 - Running a red light or stop sign
 - Entering a railroad crossing when the lights are flashing
- Violation of the Drug & Alcohol Policy
 - Dishonesty
 - Stealing/Theft
 - Unauthorized Use or Removal of Company / Client Property or Vehicle
 - Violence / Fighting / Threats
 - Harassment
 - Insubordination
 - Security
 - Sleeping on the Job
 - Destruction of Property
 - Failure to Return to Work
 - Leaving Bus or Passengers
 - Failure to Follow Sleeping Passenger Rules

Examples of **Class 2 Infractions** considered to be serious violations of the First Transit performance code include:

- Abusing or misusing sick leave
- Exchanging work assignments (trade) without proper authority
- Stopping work prior to the end of any shift without management's permission
- Excessive absenteeism, tardiness, starting work late after on the clock, or a pattern of unexcused absences unless otherwise permitted by law
- Reporting for work in an unfit condition
- Failing to obtain permission to leave work during normal working hours
- Discourteous or inappropriate attitude or behavior toward passengers or other members of the public
- Failure to comply with PPE directives
- Failure to wear a High Visibility Safety Vest, Reflective Safety Vest, or Company issued High Visibility Uniform Shirt according to Company policies
- Failure to wear Safety Glasses in compliance with PPE directives
- Failure to wear Company Assigned Shoe Grips when directed to do so
- Violation of vehicle operating regulations
- Failure to observe safety, sanitation, or disciplinary policies of the client or Company, or

laws and regulations of Local, State, or Federal governments

- Failure to comply with the Risk Assessment policy
- Working more than an employee's regularly scheduled hours without advance approval of the Company
- Failure to operate a Company vehicle according to assigned route or timetable
- Failure of any Operator, Safety Sensitive Employee or employee required to be licensed for driving, to renew and maintain a valid, appropriate driver's license with required endorsements and a medical certificate for driving a Company vehicle
- Failure to wait for connections or passing up passengers
- Transport of unauthorized persons
- Attempting to enter, entering or assisting any person to enter, or attempt to enter a Company location or restricted areas without proper authority

Examples of **Class 3 Infractions**, considered to be secondary violations of the First Transit performance code, include:

- Mandatory Reporting failure including:
 - Failure to report defective equipment
 - Failure to report a safety hazard
 - Failure to procure necessary information for an accident report or submitting an inaccurate or incomplete report
 - Failure to report law enforcement actions
- Posting, circulating or distributing written or printed material during working times and in working areas
- Failure to adhere to the Company Reverse Parking policy for Company vehicles and personal vehicles
- Use of a Company-owned radio or cell phone for non-Company business during working time
- Failure of any Operator to have in his or her possession a valid, appropriate driver's license with required endorsements and a medical certificate while driving a Company vehicle

Examples of **Class 4 Infractions**, considered to be lesser violations of the First Transit performance code that may result in disciplinary action depending on the circumstances or repeated violations, include:

- Failure to comply with the dress code, uniform policy, cleanliness, personal hygiene, personal grooming habits, or other requirements established by the client or Company
- Reporting for duty in an improper uniform, presenting an untidy, unkept or dirty appearance of person or uniform, or improperly displaying uniform articles, Company emblem, or authorized pins and badges
- Parking a personal vehicle in a restricted area at a Company location
- Neglect of job duties and responsibilities, or lack of application or effort on the job

- Incompetence or failure to meet reasonable standards of efficiency or effectiveness
- Failure to provide First Transit with a current address or telephone number
- Failure to inform First Transit of changes in status of dependents for insurance coverage
- Littering the employee lounge area, restrooms, or any other company property
- Failure to read notices and bulletins and not making an effort to stay informed

Applying Disciplinary Actions

Although employment may be terminated at-will by either the employee or First Transit at any time in accordance with applicable law, without following any formal system of discipline or warning, First Transit may exercise discretion to utilize forms of discipline that are less severe than termination.

Whenever an employee is subject to discipline, the employee’s work record, including violations occurring in the relevant time period, is reviewed before determining penalty. The chart below describes how disciplinary actions are applied.

Class of Infraction	Discharge	Suspension	Written Warning
1	1st Offense	-----	-----
2	2nd Offense*	1st Offense	-----
3	3rd Offense*	2nd Offense*	1st Offense
4	4th Offense*	3rd Offense*	1st & 2nd Offense*

*Within 12 months of first offense, 36 months for safety

Additionally, First Transit may use the following criteria to determine discipline specific to any type of traffic violation or preventable accident.

Major Offenses	Action
One violation	Discharge
Serious Violations	Action
One violation	Written warning
Two violations within any 36-month period	Discharge
Moving Violations	Action
Two violations within any 36-month period	Three-day Suspension
Three violations within any 36-month period	Discharge
Two violations within any 12-month period	Discharge
Preventable Vehicle Accidents	Action
One preventable accident	Written warning
Two preventable accidents within any 36-month period	Five-day Suspension
Three preventable accidents within any 36-month period	Discharge
Two preventable accidents within any 12-month period	Discharge

Details of First Transit's reporting requirements, infractions of company policy, and disciplinary actions that may be taken are described in more detail in *the First Transit Employee Handbook*.

Facilities

ECCTA maintenance and administration employees are encouraged to report anything believed to be a hazardous condition or practice that may cause injury to people, property, or the environment. In addition, employees are encouraged to share any suggestions to improve safety in the workplace. All injuries, accidents and near misses must be reported.

Unsafe Conditions Report

ECCTA maintenance and administration employees use the Unsafe Conditions Report to communicate any safety concerns or hazards. Forms are available in the administration hallway filing cabinet and in the maintenance work station. ECCTA employees may choose to identify themselves by name or to provide an anonymous report. The program functions as follows:

- 1) ECCTA employee completes the Unsafe Conditions Report and gives the form to their supervisor or to the Manager of Administrative Services (in person or in mailbox), or places it in the Administration Communications Confidential Mailbox located in the maintenance computer station. The Manager of Administrative Services reviews the report, meets with the ECCTA employee if necessary, and has authority to take immediate and appropriate action to correct the hazardous conditions or unsafe work practices and procedures, and to establish rules of safety as soon as they are identified.
- 2) For hazards that cannot be immediately corrected due to reasons such as the availability of needed equipment, materials and/or personnel; time for delivery, installation, modification, or construction; training periods; etc., protection shall be provided in the interim to employees who need it while correction of hazard is proceeding.
- 3) The Manager of Administrative Services notes any corrective action or the reason for no action taken on the Unsafe Conditions Report and submits a copy to the ECCTA employee.
- 4) The Manager of Administrative Services records identified hazard information in ECCTA's Systems Hazards electronic database. The reported information is shared with the Safety Solutions Team (SST), where the information is reviewed, addressed and documented. Safety concerns reported through the ECCTA employee safety reporting program will include follow up with the ECCTA employee. In addition, identified hazards receive follow up through posted SST minutes.
- 5) The Manager of Administrative Services saves the Unsafe Conditions Report in a binder.

If there is an immediate risk or imminent threat of violence, serious harm, or life-threatening conduct, employees should immediately call 911, local police, or other law enforcement.

Employee Suggestion Box

ECCTA maintenance and administration employees may also report any suggestions through an Employee Suggestion Box. ECCTA employees may choose to identify themselves by name or to provide an anonymous suggestion. An ECCTA employee suggestion box is located in the maintenance computer station and on top of the administration hallway filing cabinet. The program functions as follows:

- 1) The ECCTA employee completes the Suggestion form located next to the Suggestion Box and places the form in the Suggestion Box.

- 2) Suggestions are reviewed monthly by the CEO, COO, Director of Maintenance, and Manager of Administrative Services.
- 3) The Manager of Administrative Services records identified hazard information in ECCTA's Systems Hazards electronic database. The reported information is shared with the Safety Solutions Team (SST). Safety concerns reported through the ECCTA employee safety reporting program will include follow up with the ECCTA employee. In addition, identified hazards receive follow up through posted SST minutes.

If an employee's suggestion is chosen to be implemented and acted upon, the ECCTA employee receives a \$50 check and recognition for their suggestion.

Tri Delta Watch app

Tri Delta Watch is a free downloadable app with an Employee Safety Reporting Program (ESRP) component. ECCTA maintenance and administration employees may report safety concerns and hazards through the ESRP in the app. To report a safety concern or hazard in the Tri Delta Watch app, the employee will:

- 1) Download the free Tri Delta Watch app
- 2) In settings toggle "employee"
- 3) Enter ORG group code "TDT"
- 4) Select Report Type
- 5) Select ESRP
- 6) Select the category for the safety concern
- 7) If it is safe to do so, attach an image, report the location, and information on the safety concern

The Chief Operating Officer or Manager of Marketing and Customer Service will review the submitted ESRP and forward to the appropriate manager to review and address the safety concern. If an identified hazard is reported through the ESRP, the hazard information is recorded in ECCTA's Systems Hazards electronic database. The reported hazard is shared with the Safety Solutions Team (SST), where the information is reviewed, addressed and documented. Safety concerns reported through the ESRP will include a follow up message to the employee. In addition, identified hazards receive follow up through posted SST minutes.

The Unsafe Conditions Report, Suggestion form, and Tri Delta Watch app are shown in Appendix A.

Conditions that protect a reporting employee from discipline or enforcement action:

No action will be taken against any ECCTA maintenance or administration employee who discloses a safety concern through the ECCTA employee safety reporting program, unless disclosure indicates an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

5. Safety Risk Management

Safety Risk Management Process

Describe the Safety Risk Management process, including:

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

ECCTA's Safety Risk Management Process applies to all elements of the transit system.

Safety Hazard Identification

ECCTA desires to identify and address hazards before they cause problems. Many programs, procedures, and reporting forms are in place to assist with safety hazard identification. A hazard is defined as any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment. To assist in safety hazard identification at ECCTA, all employees are trained that a hazard is a real or potential condition; can cause a consequence; not an event (an accident, incident or occurrence). If a hazard is identified through ECCTA or First Transit's programs, procedures or reporting forms, the worst, credible potential consequence of the hazard is evaluated through the risk assessment process and the information is entered in ECCTA's Systems Hazards electronic database. The programs, procedures and reporting forms used for safety hazard identification include the following:

- **Employee Safety Reporting Program**

Through the ECCTA and First Transit employee safety reporting programs, all employees are encouraged to report anything believed to be a hazardous condition or unsafe practice that may cause injury to people, property, or the environment. In addition, employees are encouraged to share any suggestions to improve safety in the workplace. All injuries, accidents and near misses are to be reported. Hazards identified through the ECCTA and First Transit employee safety reporting programs and the worst, credible potential consequence of a hazard are recorded in ECCTA's Systems Hazards electronic database by the Manager of Administrative Services and Safety Manager.

Operations

Upon hire, each operations contract employee is provided the First Transit Employee Handbook with information on the First Transit employee safety reporting program and a Near Miss and Hazard Reporting pad. Additionally, contract employees learn about the Near Miss and Hazard Reporting form at each monthly in-service meeting when positive reinforcement and recognition is given to contract employees who demonstrate correct procedures and actions through Near Miss and Hazard Reporting. Contract employees are also trained on the Safety Management Policy Statement, using the Near Miss and Hazard Reporting pad, Tri Delta Watch app ESRP and hotline/online/email reporting option annually at an in-service meeting.

Facilities

Upon hire, ECCTA maintenance and administration employees are provided information on the ECCTA employee safety reporting program and Safety Management Policy

Statement. Additionally, The Safety Management Policy Statement is reviewed and ECCTA employees learn about the reporting forms available to them annually at a "Hazard Communication" training class and every two years at a SMS training class. The reporting forms include: Unsafe Conditions Report, Suggestion form, and the Tri Delta Watch app ESRP. ECCTA employees are also reminded quarterly about the Suggestion box and Suggestion form when suggestion winners are recognized and rewarded.

- **Facility Inspections**

ECCTA management is responsible for overseeing periodic occupational and operational inspections of facilities and equipment to identify hazards on a proactive basis. Inspection types include safety/health inspections, facility inspections, and preventative equipment inspections. A hazard identified through facility inspections, the worst, credible potential consequence of the hazard, and any corrective action taken are recorded in ECCTA's Systems Hazards electronic database by the Facilities Manager and Director of Maintenance.

Operations

Daily Safety and Health Walkthrough and Checklist

First Transit performs a daily routine safety and health walkthrough to promptly identify hazardous conditions at the facility. An identified hazard, the worst, credible potential consequence of a hazard, and any corrective action taken from the Daily Safety and Health Walkthrough are recorded in ECCTA's Systems Hazards electronic database by the Safety Manager. First Transit's SOP #802- Daily Safety and Health Walkthrough and #802a- Daily Safety and Health Walkthrough Checklist outlines procedures followed.

Facility Parking Risk Management Assessment

Inadequate turning areas, blind corners, and uneven walking surfaces can all cause collisions or employee injury in parking areas. First Transit's SOP #901- Facility Parking Risk Assessment helps identify and prevent these types of collisions for both buses and personal vehicles. The Contract General Manager must ensure compliance with all provisions of this SOP. The risk of the facility is assessed as follows:

- Annually
- Unscheduled- whenever a significant vehicle collision or a pedestrian strike occurs in the bus yard or on company premises.
- SOP #901a- Facility Parking Risk Assessment Guide and SOP #901b- Facility Parking Risk Assessment Form are tools to help with this assessment.
- An identified hazard, the worst, credible potential consequence of a hazard, and any corrective action taken from the Facility Parking Risk Management Assessment are recorded in ECCTA's Systems Hazards electronic database by the Safety Manager.

Facilities

Administration, Operations & Maintenance Facility Plan

The schedule for daily, weekly, monthly, quarterly and annual facility inspections is outlined in ECCTA's Administration, Operations & Maintenance Facility Plan. An identified hazard, the worst, credible potential consequence of a hazard, and any corrective action taken from the facility inspections are recorded in ECCTA's Systems Hazards electronic database by the Facilities Manager and Director of Maintenance.

Stormwater Prevention Plan (SWPP)

As part of ECCTA's SWPP, weekly inspections are performed on the spill covers, storm drains, sump, and sweeper. Monthly inspections are performed on eye wash stations and fire extinguishers. Annual inspections of the facility are performed to review stormwater regulation requirements compliance. Stormwater runoff samples are taken during qualifying storm events and are tested for environmental pollutants. Any identified deficiencies noted in the inspections, or when individual sample test results either exceed the instantaneous NAL or the average NAL, will be investigated to determine the cause. Deficiencies and test results exceeding either the instantaneous or average NAL caused by an identified hazard will be recorded in ECCTA's Systems Hazards electronic database by the Facilities Manager, Manager of Administrative Services, or Director of Maintenance.

Maintenance Plan

ECCTA's Maintenance Plan outlines the schedule for preventative maintenance and vehicle inspections. Vehicle inspections, which may identify a series of defects in components and parts with the potential to impact the safety performance of the vehicle are reviewed. An identified hazard, the worst, credible potential consequence of a hazard, and any corrective action taken is recorded in ECCTA's Systems Hazards electronic database by the Facilities Manager and Director of Maintenance.

Injury and Illness Prevention Plan (IIPP)

As documented in ECCTA's IIPP, a Hazard Assessment Checklist for the facility is completed annually. If any item on the checklist is marked "N," then a resolution will be sought as soon as possible. If the status of the item creates a hazard, or if the resolution of the item creates a hazard, that hazard will be recorded in ECCTA's Systems Hazards electronic database by the Facilities Manager or Manager of Administrative Services.

- **Positive Check-In Procedures and Reasonable Suspicion**

First Transit's positive check-in procedures are to ensure operators reporting are fit-for-duty. First Transit's SOP #804- Positive Check-In Procedures and Reasonable Suspicion outlines procedures followed.

- **On-Board Video Technology**

First Transit's SOP #704- On-Board Video Technology provides a summary of the on-board video system and company standards that all operations employees must follow when operating a company vehicle equipped with on-board video technology. This technology is a valuable resource that helps operations instill positive driving behaviors by providing opportunities to view recorded driving events, driver history, and company trends. The goal of this in-cab camera technology is to proactively identify unsafe behaviors and improve those identified behaviors through coaching, retraining, and if necessary, disciplinary measures in accordance with the provisions of First Transit's Employee Handbook and applicable Collective Bargaining Agreements. A hazard identified through on-board video technology, the worst, credible potential consequence of the hazard, and any corrective action taken is recorded in ECCTA's Systems Hazards electronic database by the Safety Manager.

- **Incident Report and Initial Exposure Incident Report Operations**

Operations employees document incidents that occur on the road, on the bus, or at the facility through an Incident Report. Incident Reports are for reporting any of the following that occurred: injury to employee, dispute between employees, dispute between operator/passenger, dispute between operator, motorist, dispute between passengers, operator/passenger victim of assault/theft, intoxicated passenger,

passenger illness, vandalism/damage to bus, fire on bus, bus struck animal, witness report, dispute- fare/transfer, missed passenger, object struck bus, off route, other.

Incidents with passengers involving slips and falls on or near the vehicle, fights, police action, or removal of a passenger, must be reported to dispatch immediately and require a SOP #700a- Auto & General Liability Claim Form to be completed by management before going off duty for the workday.

All other incidents and occurrences out of the norm, no matter how slight, are to be reported to dispatch upon return to the yard.

If in doubt, operators are to immediately contact dispatch.

If a hazard is identified through the Incident Report, the information is recorded in ECCTA's Systems Hazards electronic database by the Safety Manager. Risk of operator assault is identified and mitigated through incident reporting.

Facilities

ECCTA maintenance and administration employees document incidents that occur through an Incident Report. Incident Reports are for reporting any of the following that occurred: employee injury, dispute between ECCTA employees, property damage, environmental issue, other. If a hazard is identified through the Incident Report, the information is recorded in ECCTA's Systems Hazards electronic database by the Manager of Administrative Services.

ECCTA maintenance and administration employees document blood borne pathogen incidents through an Initial Exposure Incident Report. If a hazard is identified through the Initial Exposure Incident Report, the information is recorded in ECCTA's Systems Hazards electronic database by the Facilities Manager.

- **Incident Alert and Security Incident Report**

Operations

Incident Alert

First Transit's Incident Alert documents incidents that occur on ECCTA vehicles. The Incident Alert is for reporting employee injury, collision, passenger/third party injury, assault, injury to passengers with disabilities, security event, facility/property damage, sleeping children, media event, and other event. An identified hazard, the worst, credible potential consequence of the hazard, and any corrective action taken are recorded in ECCTA's Systems Hazards electronic database by the Safety Manager. Any risk of operator assault is identified and mitigated through Incident Alert reporting.

Facilities

Security Incident Report

The Security Incident Report documents incidents that occur on ECCTA property. Security Incident Reports are for reporting any of the following that occurred: arson, aggravated assault, burglary, breaking or entering, forcible rape, homicide, larceny/theft, motor vehicle theft, robbery, alcohol/drunkenness, bomb threat, disorderly conduct, drunk driving, fighting, gambling, kidnapping, liquor law violations, narcotics, sexual offenses (indecent exposure), suspicious activity, trespassing, vagrancy/loitering, vandalism, weapons, fare evasion, lost child, medical assistance, public expectoration/urination, sleepers, smoking/eating/drinking, suspicious activity, and vehicle towing. An identified hazard, the worst, credible potential consequence of the hazard, and any corrective action taken are recorded in ECCTA's Systems Hazards electronic database by the Special Project Analyst.

- **Accident Investigation**
Operations
Operator Incident Report
Auto & General Liability Claim Form
Accident & Safety Data Acquisition and Reporting
Courtesy Card

Accidents are considered to be any collision that occurs while an operator is on duty. Operators are to report all accidents and collisions to dispatch immediately upon occurrence. First Transit has the following SOPs for accident investigation.

SOP #700c– Operator Incident Report and SOP #700a– Auto & General Liability Claim Form, must be completed by the operator involved and First Transit management for accidents, possible claims of accidents, damage to equipment, injury and possible injury not later than one hour after completion of shift on the day of occurrence. Any vehicle defects that may have contributed to an accident shall be included in the report.

SOP #700– Accident & Safety Data Acquisition and Reporting, and the supporting SOP's, 700a– Auto and General Liability Claim Form; 700b- Courtesy Card; 700c– Operator Incident Report; ensure that the appropriate actions happen at the scene for the safety and security of First Transit employees and passengers; and that the appropriate data is collected to evaluate the incident, determine culpability; and develop actions to limit or eliminate the possibility of the incident occurring in the future.

An identified hazard, the worst, credible potential consequence of the hazard, and any corrective action taken from the accident investigation are recorded in ECCTA's Systems Hazards electronic database by the Safety Manager.

Facilities

Occupational Incident/Injury/Illness Investigation Report

All ECCTA maintenance and administration employees are required to immediately report and document accidents, incidents, and occurrences. The Occupational Incident/Injury/Illness Investigation Report is used to investigate reported accidents, incident, and occurrences. Root cause analysis is documented during the investigation. If a hazard is determined to be a possible causal factor, the hazard will be recorded in ECCTA's Systems Hazards electronic database by the Manager of Administrative Services and evaluated through the Safety Risk Management process.

- **Data and Information Provided by Oversight Authority and Federal Transit Administration (FTA)**
 ECCTA will monitor data and information provided by an oversight authority and FTA for any identified hazards. If the identified hazards are applicable to ECCTA, the SMS Executive will record the information in the Systems Hazards electronic database.
- **Guidelines from the Centers for Disease Control and Prevention (CDC) and California Department of Public Health (CDPH)**
Operations
 First Transit has developed the following SOPs to align with the Center for Disease Control & Prevention to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions relative to infectious diseases.
 SOP #809 – Infection Control & Response for H1N1 Influenza / MRSA / Coronavirus
 SOP #809a – MRSA General Information
 SOP #809b – H1N1 Flu General Information

Facilities

ECCTA will monitor data and information provided by the CDC and CDPH for identifying mitigations or strategies to minimize the exposure of the public, personnel, and property to infectious diseases. If the recommended mitigations or strategies are applicable to ECCTA, the Manager of Administrative Services will record the mitigations or strategies in the Systems Hazards electronic database.

Injury and Illness Prevention Program (IIPP)

ECCTA follows Cal/Osha regulations and also monitors the CDC and CDPH for information on infectious diseases. ECCTA will evaluate the IIPP, as necessary and in accordance with Cal/Osha regulations, to determine if actions are necessary to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions associated with infectious diseases. A COVID-19 Supplement and a Public Health Policy are included in the IIPP. The Manager of Administrative Services is responsible for updating the IIPP.

- **Risk Reduction Program**

ECCTA 's comprehensive Risk Reduction Program to improve safety and assist with mitigation of accidents, injuries, and assaults on transit workers includes reviewing information submitted through various reporting programs to identify, assess, and mitigate hazards associated with accidents, injuries, and transit worker assaults, and reporting transit worker assaults according to reporting requirements in FTA's National Transit Database.

The reporting programs also assist ECCTA in identifying visibility impairments for bus operators and mitigating visibility impairments. If a visibility impairment is reported, the impairment will be recorded in the Systems Hazards electronic database by the manager assigned to the reporting program.

- **Employee Safety Reporting Program-** Through the ECCTA and First Transit employee safety reporting programs, all employees are encouraged to report anything believed to be a hazardous condition or unsafe practice that may cause injury to people, property, or the environment. In addition, employees are encouraged to share any suggestions to improve safety in the workplace. All injuries, accidents and near misses are to be reported. This includes transit worker assaults and transit worker assault information is reviewed and reported in FTA's National Transit Database according to reporting requirements. Hazards identified through the ECCTA and First Transit employee safety reporting programs and the worst, credible potential consequence of a hazard are recorded in ECCTA's Systems Hazards electronic database by the Manager of Administrative Services and Safety Manager
- **Incident Report-** Operations employees document incidents that occur on the road, on the bus, or at the facility through an Incident Report. Incident Reports are for reporting any of the following that occurred: injury to employee, dispute between employees, dispute between operator/passenger, dispute between operator, motorist, dispute between passengers, operator/passenger victim of assault/theft, intoxicated passenger, passenger illness, vandalism/damage to bus, fire on bus, bus struck animal, witness report, dispute- fare/transfer, missed passenger, object struck bus, off route, other.

Incidents with passengers involving slips and falls on or near the vehicle, fights, police action, or removal of a passenger, must be reported to dispatch immediately and require a SOP #700a– Auto & General Liability Claim Form to be completed by management before going off duty for the workday.

All other incidents and occurrences out of the norm, no matter how slight, are to be reported to dispatch upon return to the yard.

If in doubt, operators are to immediately contact dispatch.

Transit worker assault information is reviewed and reported in FTA's National Transit Database according to reporting requirements. If a hazard is identified through the Incident Report, the information is recorded in ECCTA's Systems Hazards electronic database by the Safety Manager.

ECCTA maintenance and administration employees document incidents that occur through an Incident Report. Incident Reports are for reporting any of the following that occurred: employee injury, dispute between ECCTA employees, property damage, environmental issue, other. This includes transit worker assaults and transit worker assault information is reviewed and reported in FTA's National Transit Database according to reporting requirements. If a hazard is identified through the Incident Report, the information is recorded in ECCTA's Systems Hazards electronic database by the Manager of Administrative Services.

- **Incident Alert-** First Transit's Incident Alert documents incidents that occur on ECCTA vehicles. The Incident Alert is for reporting employee injury, collision, passenger/third party injury, assault, injury to passengers with disabilities, security event, facility/property damage, sleeping children, media event, and other event. Transit worker assault information is reviewed and reported in FTA's National Transit Database according to reporting requirements. An identified hazard, the worst, credible potential consequence of the hazard, and any corrective action taken are recorded in ECCTA's Systems Hazards electronic database by the Safety Manager. Any risk of operator assault is identified and mitigated through Incident Alert reporting.
- **Security Incident Report-**The Security Incident Report documents incidents that occur on ECCTA property. Security Incident Reports are for reporting any of the following that occurred: arson, aggravated assault, burglary, breaking or entering, forcible rape, homicide, larceny/theft, motor vehicle theft, robbery, alcohol/drunkenness, bomb threat, disorderly conduct, drunk driving, fighting, gambling, kidnapping, liquor law violations, narcotics, sexual offenses (indecent exposure), suspicious activity, trespassing, vagrancy/loitering, vandalism, weapons, fare evasion, lost child, medical assistance, public expectoration/urination, sleepers, smoking/eating/drinking, suspicious activity, and vehicle towing. Transit worker assault information is reviewed and reported in FTA's National Transit Database according to reporting requirements. An identified hazard, the worst, credible potential consequence of the hazard, and any corrective action taken are recorded in ECCTA's Systems Hazards electronic database by the Special Project Analyst.
- **Accident Investigations-** Accidents are considered to be any collision that occurs while an operator is on duty. Operators are to report all accidents and collisions to dispatch immediately upon occurrence. First Transit has the following SOPs for accident investigation.

SOP #700c– Operator Incident Report and SOP #700a– Auto & General Liability Claim Form, must be completed by the operator involved and First Transit management for accidents, possible claims of accidents, damage to equipment, injury and possible injury not later than one hour after completion of shift on the day of occurrence. Any vehicle defects that may have contributed to an accident shall be included in the report.

SOP #700– Accident & Safety Data Acquisition and Reporting, SOP 700a– Auto and General Liability Claim Form; 700b- Courtesy Card; 700c– Operator Incident Report; ensure that the appropriate actions happen at the scene for the safety and security of First Transit employees and passengers; and that the appropriate data is collected to evaluate the incident, determine culpability; and develop actions to limit or eliminate the possibility of the incident occurring in the future.

An identified hazard, the worst, credible potential consequence of the hazard, and any corrective action taken from the accident investigation are recorded in ECCTA's Systems Hazards electronic database by the Safety Manager.

- **Occupational Incident/Injury/Illness Investigation Report-** All ECCTA maintenance and administration employees are required to immediately report and document accidents, incidents, and occurrences. The Occupational Incident/Injury/Illness Investigation Report is used to investigate reported accidents, incident, and occurrences. Root cause analysis is documented during the investigation. If a hazard is determined to be a possible causal factor, the hazard will be recorded in ECCTA's Systems Hazards electronic database by the Manager of Administrative Services and evaluated through the Safety Risk Management process.

The Maintenance Plan is located in the Director of Maintenance office. The Administration, Operations & Maintenance Facility Plan and Initial Exposure Incident Report are located in the Facilities Manager office. The SWPP, IIPP, Incident Report, and Occupational Incident/Injury/Illness Investigation Report are located in the Manager of Administrative Services office. The Security and Emergency Preparedness Program is located in the Special Project Analyst office, the Contract General Manager office, and outside the Facility Manager office. The Daily Health and Safety Walkthrough, Daily Health and Safety Walkthrough Checklist, Incident Report, Incident Alert, Auto & General Liability Claim Form, Accident & Safety Data Acquisition and Reporting, and Courtesy Card are located with the First Transit Contract General Manager and with the SMS Executive.

Safety Risk Assessment

Systems Hazards electronic database

ECCTA uses a Systems Hazards electronic database to assist with safety risk assessment. When a hazard is identified, a Systems Hazards Sheet is created to measure and analyze the safety risk. The Systems Hazards Sheet is saved in the Systems Hazards electronic database. The risk description is documented on the Systems Hazards Sheet. Applicable details such as bus number and location are reported, if available. The risk likelihood and risk severity are determined taking into account existing mitigations, then a risk assessment is automatically calculated based on the Risk Assessment Matrix. Risk impact, risk response, and response strategy are documented. A contingency plan is documented if it is determined necessary. The information is shared and discussed by the Safety Solutions Team. After approval of any additional mitigation, mitigation steps are implemented by an assigned manager, then the safety risk index is reviewed.

1) Risk Likelihood

The definition of risk likelihood is how often the consequence of the hazard might occur, considering the worst foreseeable- but credible- condition. Determination of risk likelihood must take into account existing mitigations. The subjective measure is ranked as follows:

- A) Frequent-** Will occur frequently in the life of an item; continuously experienced in fleet/inventory
- B) Probable-** Will occur several times in the life of an item; will likely occur in fleet/inventory
- C) Occasional-** Likely to occur sometimes in the life of an item; will occur several times in fleet/inventory
- D) Remote-** Unlikely but possible to occur in life of an item; unlikely, but can be expected to occur in fleet/inventory
- E) Improbable-** So unlikely, occurrence may not be experienced; unlikely to occur, but possible to occur in fleet/inventory
- F) Eliminated-** Risk removed/eliminated; will not occur in fleet/inventory

Likelihood Level		Likelihood of event in specific item	Occurrence Description
a	Frequent	Will occur frequently	Continuously Experienced
b	Probable	Will occur several times	Will likely occur
c	Occasional	Likely to occur sometimes	Will occur several times
d	Remote	Unlikely but possible to occur	Unlikely, but can be expected to occur
e	Improbable	So unlikely, occurrence may not be experienced	Unlikely to occur, but possible
f	Eliminated	Risk removed / eliminated	Will not occur

2) Risk Severity

Risk severity is the anticipated effects of a consequence of the hazard, should it materialize. It is a subjective assessment of the damaging potential of the consequence of the hazard under the worst foreseeable- but credible- condition. Determination of risk severity must take into account existing mitigations. Risk severity is categorized as follows:

- 1) **Catastrophic**- Death or system loss
- 2) **Critical**- Severe injury, severe occupational illness, or major system damage
- 3) **Marginal**- Minor injury, minor occupational illness, or minor system damage
- 4) **Negligible**- Less than minor injury, less than minor occupational illness, or less than minor system damage

Severity	1. Catastrophic	2. Critical	3. Marginal	4. Negligible
Injury	Death	Severe Injury	Minor Injury	Less Than Minor Injury
Occupational Illness	Death	Severe Occupational Illness	Minor Occupational Illness	Less Than Minor Occupational Illness
Service/ Operation	System Loss	Major System Damage	Minor System Damage	Less Than Minor System Damage

3) Risk Assessment Matrix

The Risk Assessment Matrix calculates the risk level based on the risk likelihood and risk severity analysis. The risk assessment allows ECCTA to evaluate the acceptability of the safety risk and prioritize safety risk mitigation efforts.

- 1) High
- 2) Serious
- 3) Medium
- 4) Low
- 5) Eliminated

ECCTA RISK ASSESSMENT MATRIX

ECCTA Risk Assessment Matrix		SEVERITY			
		1. Catastrophic	2. Critical	3. Marginal	4. Negligible
LIKELIHOOD	a. Frequent	High (1a)	High (2a)	Serious (3a)	Medium (4a)
	b. Probable	High (1b)	High (2b)	Serious (3b)	Medium (4b)
	c. Occasional	High (1c)	Serious (2c)	Medium (3c)	Low (4c)
	d. Remote	Serious (1d)	Medium (2d)	Medium (3d)	Low (4d)
	e. Improbable	Medium (1e)	Medium (2e)	Medium (3e)	Low (4e)
	f. Eliminated	Eliminated			
Resolution Requirements					
High		Unacceptable	correction required		
Serious		Undesirable	correction may be required, decision by management		
Medium		Acceptable w/ review	with review and documentation by management		
Low		Acceptable	without review		
Eliminated		Acceptable	no action needed		

Based on Military Standard 882E

4) Risk Impact

Risk impact describes the worst, credible potential consequence of a hazard.

5) Risk Response

Risk response strategies are the approaches ECCTA can take to manage the safety risk associated with the hazard. Risk response is categorized as follows:

- 1) **Acceptance.** Accept the consequences of the hazard.
- 2) **Avoidance.** Avoid the consequences of the hazard.
- 3) **Contingency.** Backup solution to reduce the likelihood and/or severity of consequences of the hazard.
- 4) **Mitigation.** Solution to reduce the likelihood and/or severity of consequences of the hazard.
- 5) **Transfer.** Shift the consequences of the hazard from one party to another.

The Systems Hazards Sheet is listed in Appendix B.

Safety Risk Mitigation

ECCTA strives to reduce to the lowest level practical, the safety risk associated with an identified hazard. Safety risk mitigation is not synonymous with hazard elimination. ECCTA's transit environment contains some hazards that are impossible to eliminate and others that are highly impractical to eliminate. Accomplishing reduction of risk to the lowest practical level occurs in a variety of ways, from protective and warning devices to special procedures. There are, however, some hazards that present unacceptable risk requiring reduction or elimination of the risk. Part of the safety risk mitigation process is the use of the Risk Assessment Matrix. The matrix describes if the safety risk level is acceptable, acceptable with review, undesirable, or unacceptable.

ECCTA's Risk Assessment Matrix is as follows:

ECCTA RISK ASSESSMENT MATRIX

ECCTA Risk Assessment Matrix		SEVERITY			
		1. Catastrophic	2. Critical	3. Marginal	4. Negligible
LIKELIHOOD	a. Frequent	High (1a)	High (2a)	Serious (3a)	Medium (4a)
	b. Probable	High (1b)	High (2b)	Serious (3b)	Medium (4b)
	c. Occasional	High (1c)	Serious (2c)	Medium (3c)	Low (4c)
	d. Remote	Serious (1d)	Medium (2d)	Medium (3d)	Low (4d)
	e. Improbable	Medium (1e)	Medium (2e)	Medium (3e)	Low (4e)
	f. Eliminated	Eliminated			
Resolution Requirements					
High		Unacceptable	correction required		
Serious		Undesirable	correction may be required, decision by management		
Medium		Acceptable w/ review	with review and documentation by management		
Low		Acceptable	without review		
Eliminated		Acceptable	no action needed		

Based on Military Standard 882E

After the risk assessment is complete, resolution requirements indicate if the safety risk level is:

- 1) **High- Unacceptable** with correction required
- 2) **Serious- Undesirable** and correction may be required, decision by management needed
- 3) **Medium- Acceptable with review** and documentation by management
- 4) **Low- Acceptable** without review by management
- 5) **Eliminated- Acceptable** with no action needed

Elimination or reduction of hazards with safety risk in the highest risk category in the Risk Assessment Matrix (High: 1a, 1b, 1c, 2a, 2b) occurs until the hazards are in a lower risk category and acceptable. Elimination or reduction of hazards with safety risk in the second

highest risk category in the Risk Assessment Matrix (Serious: 1d, 2c, 3a, 3b) occurs until the hazards are in a lower risk category, if possible, and acceptable.

Approach to Hazard Elimination and Mitigation

If the safety risk associated with an identified hazard requires correction, mitigation efforts will occur, if possible. Risk mitigation is a solution that reduces the likelihood and/or severity of consequences of the hazard. If mitigation is recommended, ECCTA uses a hierarchal approach to eliminate or reduce the safety risk associated with the hazard:

- 1) **Design for minimum risk**
- 2) **Use of safety devices**
- 3) **Use of warning devices**
- 4) **Provide special procedures and training**
- 5) **Provide Personal Protective Equipment (PPE)**

Design for minimum risk

When designing for minimum risk, there should be provisions in all designs to identify and eliminate hazards through appropriate safety and security design concepts. To the extent permitted by cost and practicality, identified hazards are eliminated or controlled by the design of equipment, systems and facilities. Design provides mitigation to the lowest practical risk level for hazards not eliminated.

Use of safety devices

After design, the use of fixed, automatic, or other protective safety devices may reduce remaining hazards to an acceptable risk level. These safety devices are critical system elements and will be inspected and maintained as such.

Use of warning devices

When design and safety devices cannot effectively mitigate hazards, use of warning devices may provide timely detection of the activated hazard and generate adequate warning signals to alert persons of the hazard. Design of warning signals shall minimize the probability of incorrect reaction to the warning by employees or other individuals. These warning devices are critical system elements and will be inspected and maintained as such.

Provide special procedures and training

Where it is impossible to adequately mitigate hazards through design, safety devices, or warning devices, written procedures and training are used to either reduce the likelihood of the hazard occurring, reduce the severity of the hazard if it does occur, or both, so that an acceptable risk level is achieved.

Provide Personal Protective Equipment (PPE)

When design, safety devices, warning devices, written procedures and training cannot effectively mitigate hazards, PPE may be used to achieve an acceptable risk level. The use of PPE ensures employees wear the proper protective clothing, gloves, safety glasses, ear protection, etc. for the job.

The documented risk response strategy is shared with the Safety Solutions Team. After concurrence by the Safety Solutions Team, the risk response strategy for a safety risk of high, serious, or medium level is presented to the CEO who may accept, modify, or reject the recommendation. Upon modification or rejection of the recommendation, the Safety Solutions Team will further analyze, determine strategy and recommend other actions until final approval by the CEO. Referral of the approved risk response strategy is directed to the responsible department manager for implementation. The safety risk is re-evaluated by the Safety Solutions Team for acceptability or the need for further mitigation.

6. Safety Assurance

Safety Performance Monitoring and Measurement

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

ECCTA monitors the system for compliance with procedures for operations and maintenance according to the following chart.

Safety Assurance Process	If yes, then....
Procedures Monitoring and Measurement	
Inadequate compliance?	Address non-compliance
Insufficient?	Evaluate hazards through Safety Risk Management

Operations

On-Board Video Technology

On-Board Video Technology is a valuable resource that helps operations instill positive driving behaviors by providing opportunities to view recorded driving events, driver history, and company trends. The goal of this in-cab camera technology is to proactively identify unsafe behaviors and improve those identified behaviors through coaching, retraining, and if necessary, disciplinary measures in accordance with the provisions of First Transit's Employee Handbook and applicable Collective Bargaining Agreements. If monitoring On-Board Video Technology indicates that an operator's recorded driving event needs addressed, the operator is coached and retrained for the event. First Transit Corporate monitors On-Board Video Technology reports to determine upcoming in-service agendas and training. The Safety Manager monitors On-Board Video Technology and will evaluate any identified hazards through the Safety Risk Management process.

Performance Audits

First Transit monitors operator performance to identify any non-compliance with procedures or insufficient procedures. If monitoring indicates that employees are not complying with procedures, the evaluator will address the non-compliance with re-training. If monitoring indicates that procedures are insufficient, the Safety Manager will evaluate any identified hazards through the Safety Risk Management process.

Maintenance

Mechanical Failures

Through monitoring mechanical failures, ECCTA's Director of Maintenance monitors that ECCTA maintenance employees are complying with procedures. If monitoring indicates that maintenance employees are not complying with procedures, the Director of Maintenance will address the non-compliance. If monitoring indicates that procedures are insufficient, the Director of Maintenance will evaluate any identified hazards through the Safety Risk Management process.

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

ECCTA monitors operations to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended according to the following chart.

Safety Assurance Process	If yes, then....
Safety Risk Mitigation Monitoring and Measurement	
Ineffective?	Evaluate hazards through Safety Risk Management
Inappropriate?	Identify new mitigation under Safety Risk Management
Not implemented?	Address non-compliance

Safety Solutions Team (SST)

Information reported through ECCTA's Systems Hazards electronic database is reviewed by the Safety Solutions Team (SST). SST members discuss identified hazards, assess and mitigate risk through safety risk management, and then communicate follow up information on identified hazards reported through the employee safety reporting programs in posted SST minutes. Throughout this process, SST members also monitor safety risk mitigations. SST members discuss mitigations or strategies that may be ineffective, inappropriate, or not implemented as intended and assist in identifying safety deficiencies for continuous improvement. If monitoring identifies any safety risk mitigation that is ineffective, then the hazard will be evaluated through the Safety Risk Management process. If monitoring identifies any safety risk mitigation that is inappropriate, then new mitigation will be identified under the Safety Risk Management process. If monitoring identifies any safety risk mitigation that was not implemented, then the non-compliance will be addressed.

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

A safety event is any accident, incident, or occurrence. ECCTA conducts investigations of safety events to identify causal factors according to the following chart.

Safety Assurance Process	If yes, then....
Safety Event Investigations	
Causal factors identified?	Evaluate hazards through Safety Risk Management
Information collected?	Use to monitor and measure through other Safety Assurance processes

Operations

Elimination of preventable injuries and collisions is the number one goal. Accidents, incidents, and occurrences are investigated. Any injury, collision or incident that occurs is investigated to determine preventability or non-preventability. Investigations include all instances in which:

- an ECCTA vehicle was damaged, or causes damage
- an ECCTA vehicle leaves the traveled roadway
- a passenger is injured on or by an ECCTA vehicle
- an employee is injured in the workplace
- a pedestrian is injured caused by an ECCTA vehicle

SOP #700-Accident & Safety Data Acquisition describes the data collection process including:

- Defining the Event & What to Do
- Accidents– Defining the Accident
- Rules That Apply to an Accident
- Operator Responsibility
- Accident Investigation Responsibilities

The Safety Manager reviews the data collected to determine if the accident/incident was preventable or non-preventable. If a hazard is determined to be a possible causal factor, the hazard will be recorded in ECCTA's Systems Hazards electronic database by the Safety Manager and evaluated through the Safety Risk Management process.

Facilities

Occupational Incident/Injury/Illness Investigation Report

All ECCTA maintenance and administration employees are required to immediately report and document accidents, incidents, and occurrences. The Occupational Incident/Injury/Illness Investigation Report is used to investigate reported accidents, incident, and occurrences. Root cause analysis is documented during the investigation. If a hazard is determined to be a possible causal factor, the hazard will be recorded in ECCTA's Systems Hazards electronic database by the Manager of Administrative Services and evaluated through the Safety Risk Management process.

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

ECCTA monitors information reported through internal safety reporting programs according to the following chart.

Safety Assurance Process	If yes, then....
Internal Reporting Programs Monitoring and Measurement	
Safety concerns identified?	Evaluate hazards through Safety Risk Management
Information collected?	Use to monitor and measure through other Safety Assurance processes

Safety Solutions Team (SST)

Information reported through ECCTA's Systems Hazards electronic database is reviewed by the Safety Solutions Team (SST). SST members discuss identified hazards, assess and mitigate risk through safety risk management, and then communicate follow up information on identified hazards reported through the employee safety reporting programs in posted SST minutes. Throughout this process, SST members also monitor safety risk mitigations. SST members discuss mitigations or strategies that may be ineffective, inappropriate, or not implemented as intended and assist in identifying safety deficiencies for continuous improvement.

Management of Change and Continuous Improvement

As a small agency, ECCTA is not required to implement a management of change process or a continuous improvement process. ECCTA does not implement these processes.

7. Safety Promotion

Competencies and Training

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

Safety is a top priority at ECCTA. Safety information and training is provided to all employees, both ECCTA employees and First Transit employees. First Transit provides the training program for all operations employees, which includes operators, dispatchers, schedulers, and operations lead staff. ECCTA provides the training program for all maintenance and administrative employees.

First Transit communicates hazards and safety risks relevant to employee's roles and responsibilities for operations employees during New Hire Training, as documented below. ECCTA communicates hazards and safety risks relevant to employee's roles and responsibilities for maintenance and administrative employees in its training program, as documented in Appendix C, and in individual job descriptions, as is documented in the employee handbook. Job descriptions are reviewed with maintenance and administrative employees upon hire, at SMS training, and are included in the employee handbook.

ECCTA and First Transit have the following safety training programs:

Operations

First Transit provides the training program for all operations employees. Training employees to assess risks and recognize and avoid hazards in the workplace is critical to the overall safety of the workplace. Every First Transit employee is trained in "**BeSafe**" and "**Safe Work Methods**". "**BeSafe**" is First Transit's company-wide approach to safety management. This program takes safety performance to the next level through behavioral change. "BeSafe" is inclusive, collaborative and focuses on recognizing and acknowledging safe behavior and actions through positive reinforcement such as debriefs, tours, and employee engagement. All contract employees are trained in the principles of "BeSafe." First Transit's "**Safe Work Methods**" is designed to educate employees on how to identify conditions and actions posing risks to their well-being and that of their coworkers. This training is to be used:

- In training new hire employees
- In leading supervisors in identifying root causes of workplace injuries
- In retraining injured workers so that re-occurrences are avoided
- To supplement First Transit's First Occupational Rehabilitation Management (F.O.R.M.) light duty and return to work management program, in controlling workers compensation losses

The "Safe Work Methods" training curriculum includes:

New Hire Training

New hire training is designed to educate the new employee to the hazards commonly found in the transportation environments including in vehicle maintenance shops, bus yards, fuel islands, wash bays, and office environments. The program also makes employees aware of injuries that can result from physical activities such as entering and exiting vehicles, assisting persons with disabilities, and handling mobility devices.

- PPE program including requirements for appropriate
 - Safety eyewear
 - Safety footwear
 - Safety hand wear
 - Hi-Vis vests

- Disposal contaminated materials
- Risk Assessment and Injury Avoidance
 - Walking and Climbing
 - Lifting, Carrying, Holding, and Lowering Objects
 - Pushing, Pulling, and Twisting
 - Burns, Scalds
 - Exposed Fluids, Chemicals, Smoke
 - Cuts, Punctures, Abrasions, Lacerations
 - Mobility Device Lifts/Ramps

Requirements for Operator Training

Applicants are required to successfully complete a comprehensive training program prior to transporting passengers. Trainees are continually evaluated and tested throughout the training program. Trainees who do not demonstrate the required level of proficiency are provided additional training or are removed from training. The operator training program combines instructor-led sessions, video instruction, facilitated discussion, and opportunities for the trainees to practice what they have learned. Training topics include:

Classroom Training

The first part of operator training at First Transit, classroom training, begins the process of instilling the safety culture into each operator. Helping the student operators understand the importance of keeping themselves and each passenger safe; and their responsibilities in maintaining a safe environment, is a theme integrated throughout.

- **Unit 1- Introduction**
 - Welcome and Introduction
 - Title VI Civil Rights Act 1964
 - Employee Handbook
 - BeSafe - Making Safety Personal
 - Hazardous Communication
 - Blood borne Pathogens
 - Busing on the Look Out
 - FT Safe Wheels
- **Unit II- Fundamentals**
 - Safe Work Methods
 - Basics of Safety
 - Managing Emergencies
 - Security Awareness
 - Map Reading
 - Communication Devices
 - Navigation and Fare Policies
 - Smith System
- **Unit III- The Operator**
 - Drug and Alcohol Awareness
 - Distracted Driving
 - Fatigue and Sleep Apnea Awareness
 - DriveCam Orientation
- **Unit IV- Transporting Passengers with Disabilities**
 - Transporting Passengers with Disabilities
 - Interacting with Passengers
 - Diffusing Conflict
 - Passenger Care While Loading and Unloading
 - Mobility Aids and Devices

- **Unit V- Driving Fundamentals**

- Driving Fundamentals I
- Driving Fundamentals II
- Roadway Types
- Railroad Crossings

Behind-the-Wheel Training

Behind-the-Wheel training is conducted in three phases. Since most people coming to work as a bus operator have not been exposed to driving the types of vehicle used at First Transit, the first part of behind-the-wheel training takes place on a closed course. This provides the opportunity for the Instructors to evaluate the skill levels of each employee; and gives each employee the opportunity to make and learn from their mistakes in a safe environment.

The next phase of Behind-the-Wheel training takes place on the road, but in a controlled manner. During the road phase of the training, each student operator works one-on-one with a First Transit Instructor. The road work begins with the basics; intersections, service stops, and backing. The next advanced stage of the road work addresses roadways, highway driving, and continues the instruction on intersections and service stops. The "Smith Driving System" principles are incorporated throughout the entire Behind-the-Wheel training phase.

- **Closed Course (Group Work)**

- Vehicle Orientation
 - Pre-Trip Inspection
 - Seat Adjustment
 - Mirror Adjustment
 - Braking, Accelerating, and Transmission
 - Wheelchair Securement
- Reference Points
 - Lane Position
 - Right Side / Left Side
 - Backing Point
 - Forward Stop
 - Pivot Points
 - Turning Points
- Vehicle Control
 - Straight in Lane
 - Left Turn
 - Right Turn
 - Lane Changing- Moving Right or Left

- **One on One Instruction Behind-the-Wheel**

- **Basic Road Work**
 - "Smith System"
 - Intersections
 - Service Stops
 - Backing

- **Advanced Road Work**

- "Smith System" Commentary Driving
- Roadways
- Expressway / Highway Driving
- Intersections
- Service Stops

- **Final Evaluation**
Upon completion of the training program, before an operator can be placed into service, they must successfully demonstrate their mastery of the skills and practices learned during the training program.
- **Cadet Training**
Once a new operator has been placed into service there is period of observation where an experienced operator, instructor, or supervisor periodically rides-along to ensure the skills learned in training have successfully transferred to providing service. This includes the securement and transportation of a person with a disability.

Requirements for Staff Training

Staff personnel are trained in Safety Leadership and “BeSafe”.

- **Safety Leadership**
This is an interactive CD-ROM course consisting of 5 CD’s and leaders guides which are designed to educate all levels of First Transit management on the behaviors surrounding accidents. Every level of management takes the course and successfully pass an online test, found on the Safety Resource Center (SRC), with a passing grade of 90% or better.

The course outline is as follows:

- Safety Leadership
 - Accidents
 - Behavior
 - Leadership
- Supervisor Development
 - The Role of the Supervisor
 - Communication
 - Building Trust
 - Conflict Resolution
 - Performance Management
 - Decisions
- **Additional Safety Training**
 - Reasonable Suspicion
 - Supervisor’s Report of Reasonable Suspicion
 - Code of Conduct
 - Customer Service
 - OSHA Requirements
 - Hazard Abatement FORM– CA Only

Requirements for Continuing Training and Evaluations

First Transit provides ongoing employee training and evaluations.

The objective of ongoing evaluations is met through a broad spectrum of regularly scheduled management activities including:

- road observations,
- ride along evaluations, and
- daily safety contacts.

Where evaluations and observations identify unsafe acts or conditions, retraining is provided to improve skill levels in accordance with corporate standards.

Safety Meetings

- Twelve (12) safety meetings are held annually with required topics identified by the location and region safety management
- Each meeting is to be a minimum of one (1) hour in length
- A required topic along with a safety campaign including posters and DVD is presented to all employees
- Annual de-escalation training is provided at the October safety meeting
- Attendance is a condition of employment and is mandatory for all operators, management, and operational staff. *(Unless stated otherwise in the Collective Bargaining Agreement.)*
 - Failure to attend all meetings will result in disciplinary actions up to and including termination.

Retraining

Elimination of preventable injuries and collisions is the number one goal. A contract employee involved in a preventable injury or collision is placed on administrative leave pending completion of the investigation and completion of any required retraining.

Facilities

All ECCTA maintenance and administration employees participate in an employee orientation on the first day of being hired. The Workplace Security Program, Safety Management Policy Statement and employee safety reporting program are discussed at orientation. ECCTA maintenance and administration employees receive annual training at the "Hazard Communication" class and training every two years at the "Safety Management System and De-escalation Training" class on the Safety Management Policy Statement and ECCTA employee safety reporting program.

ECCTA has a comprehensive health and safety training program in order to accomplish the agency's safety objectives. The training program is designed to instruct each ECCTA maintenance and administration employee regarding general safety procedures, as well as hazards and safety procedures specific to each employee's duty assignment. Training is provided on an annual basis for all permanent ECCTA maintenance and administration employees according to the training matrix in **ECCTA's training program (Appendix C)**.

Safety Communication

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

Safety and safety performance information is communicated throughout the organization. Information on the ECCTA and First Transit employee safety reporting programs and how to communicate safety concerns is communicated upon hire and during trainings.

Operations

In addition to the required OSHA, state and federal posters in the driver's room, First Transit has four main communication boards featuring different safety information. Safety communication content includes safety-related hazards and safety messaging for the operations department.

- **BeFirst-** The BeFirst safety communication board is regularly updated to reflect the number of collision free days, injury free days, and lost work days. There are two safety topics communicated on the BeFirst board. Safety topics are selected by the First Transit corporate safety team.

- **In the Spotlight-** In the Spotlight is used to communicate current operational and safety information. Safety department communication, how to report safety concerns, monthly SST minutes which includes follow up information on identified hazards reported through the employee safety reporting program, and the Safety Management Policy Statement are posted on this communication board.
- **Hot Spot-** The Hot Spot board is located near the door to the bus yard and displays road safety tips. Road safety tips are updated as needed to focus on the current safety topic.
- **Health & Wellness Board-** The Health & Wellness Board is updated monthly with nutrition, financial, local, safety, fitness, and topic of the month information. This board communicates the health management program to employees.

First Transit has individual motivators in place using individual achievement awards to help affect individual safety improvement through the use of personal recognition awards. Currently established safety awards for First Transit employees are:

- **Annual Safe Driver Awards**

In addition, the “**First Transit Connect**” employee app is a peer to peer safety communication tool offering safety tips, best practices, recognition, ideas on “What Works”, Safety Happenings, and Safety Pep Rallies.

Your new employee app is here!

With the CONNECT app you can...

- ...get the latest news and info from your location
- ...keep up with what's happening nationally across First Transit
- ...give feedback ask questions, and submit ideas

Available **FREE!** for iPhone and Android!
Download in the App store or Google Play

How to Get Started:

1. Go to your app store and find First Transit Connect.
2. Click *Get* or *Install* to download.
3. Open the app and register. (*Hint: Register is at bottom of screen. Your employee ID is on the right side of your paycheck or stub. You can also find it on your pay statement on the ADP self-serve website.*)
4. Once you've registered, you have access to all the features on First Transit Connect!

Download today and get connected!

Search your app store for **First Transit Connect**
or ask your manager for more information
Need More Help? Email us at FirstTransitConnect@firstgroup.com

Download on the **App Store**

GET IT ON **Google play**

Image from operations contractor, First Transit's Safety Plan

Facilities

The required OSHA, state and federal posters are placed in the maintenance and administration employee break room. In addition, the maintenance department has safety posters at the computer work station and a communication board that is updated as needed. The administration department has a communication board in the break room that is updated as needed. How to report safety concerns, and the Safety Management Policy Statement are posted on the maintenance and administration communication boards. A binder with monthly SST minutes, which includes follow up information on identified hazards reported through the employee safety reporting program, is located in the administration break room and in maintenance near the Safety Data Sheet binder.

ECCTA holds an annual Safety Awards Luncheon for maintenance and administrative employees to recognize the importance of safety at the agency. One maintenance employee and one administration employee are selected as the "Safety Employee of the Year".

Additional Information

Supporting Documentation

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

The following additional documents are used to implement and carry out the Safety Plan.

- *First Transit Agency Safety Plan.* The SMS Executive has a copy of the plan.
- *First Transit Employee Handbook.* The SMS Executive has a copy of the employee handbook.
- *First Transit Safety Management System SOP #801 and #801a Mobility Device & Mobility Device Occupant Securement- Bus Operator Evaluation.* This document relates to performance audits and Safety Assurance. The SMS Executive has a copy of the SOP.
- *First Transit Safety Management System SOP #803 Safety Solutions Team.* This document describes the operation of the safety committee. The SMS Executive has a copy of the SOP.
- *First Transit SOP #900 Facility Hazard Recognition Manual.* This document outlines First Transit's Safety Management System Policy. The SMS Executive has a copy of the SOP.
- *First Transit System Safety & Security Plan. Injury & Illness Prevention Program- CA only.* This document assists with Safety Hazard Identification. The Contract General Manager has a copy of the plan.
- *ECCTA Injury Illness and Prevention Plan in the ECCTA Employee Handbook* assists with Safety Hazard Identification. The Manager of Administrative Services maintains this document.
- *ECCTA Training Program in the Hazardous Materials Business Plan.* This document outlines the safety training program that is a component of Safety Promotion. The Manager of Administrative Services maintains this document.
- *Security and Emergency Preparedness Program.* This document assists with Safety Hazard Identification. The Special Project Analyst maintains the security incident reports and the plan.

ECCTA maintains records related to this Safety Plan and SMS implementation for a minimum of three years. These documents include, but are not limited to, the results from the SMS processes and activities. ECCTA will make this documentation available upon request to the FTA or other oversight agencies.

Definitions of Special Terms Used in the Safety Plan

Term	Definition
Accident	An event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
Consequence	An effect of a hazard involving injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
Event	Any accident, incident, or occurrence.
Hazard (First Transit definition)	Anything that may cause harm in the near future.
Hazard	Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
Hazard Analysis	Formal activities to analyze potential consequences of hazards during operations related to provision of services.
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 a transit agency.
Near Miss	An event you witnessed where no harm was caused, but there was the potential to cause injury or ill health; a dangerous occurrence.
Occurrence	An event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
Performance Target	A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).
Risk likelihood	The likelihood that the consequence might occur, considering the worst foreseeable-but credible-condition.
Risk	Composite of predicted severity and likelihood of the potential effect of a hazard.
Risk Impact	The effect or consequences of the risk.
Risk Mitigation	The activities whereby a public transportation agency controls the likelihood or severity of the potential consequences of hazards.
Safety Assurance	The processes within a transit agency's SMS that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

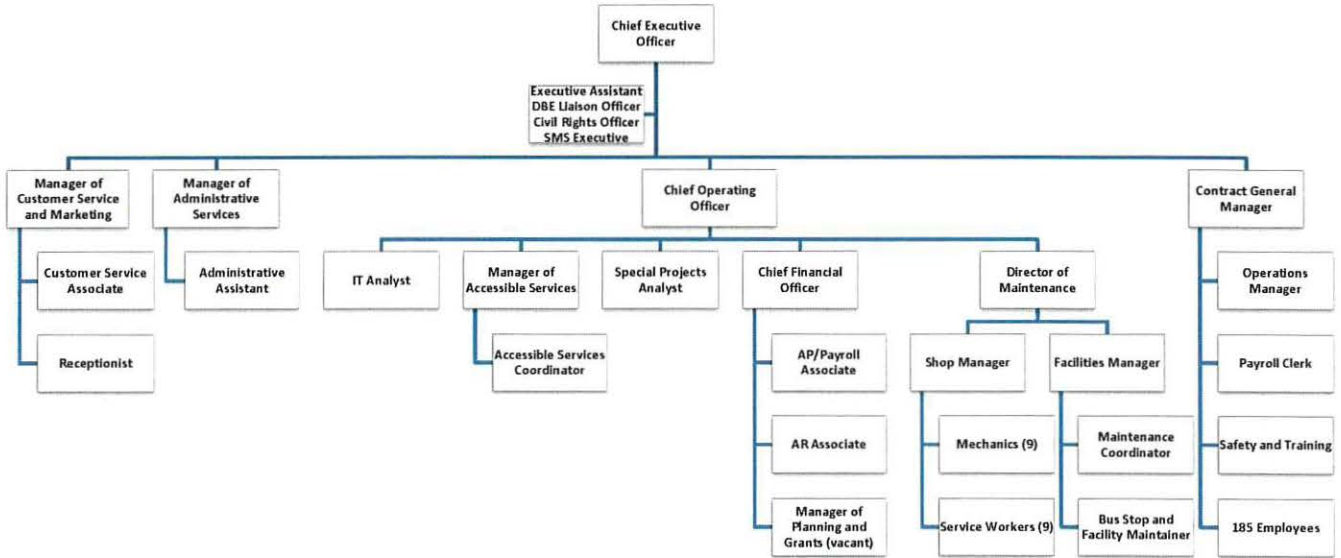
Safety Deficiency	A condition that is a source of hazards and/or allows the perpetuation of hazards in time.
Safety Risk Management	A process within a transit agency's safety plan for identifying hazards, assessing the hazards, and mitigating safety risk.
Safety Risk Severity	The anticipated effects of a consequence, should it materialize, taking as reference the worst foreseeable-but credible-condition.
Safety Management Policy	A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
Safety Management System (SMS)	The formal, top down, data-driven, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systemic procedures, practices and policies for managing risks and hazards.
Safety Performance Target	A performance target related to safety management activities.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
Safety Risk	The assessed likelihood and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome.
Serious Injury	Any injury which: (1) requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received; (2) results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (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.
Vehicle Revenue Miles	The miles that vehicles are scheduled to or actually travel while in revenue service.

List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
BART	Bay Area Rapid Transit
CEO	Chief Executive Officer
COO	Chief Operating Officer
Caltrans	Caltrans Division of Rail and Mass Transit
DUI	Driving Under the Influence
DWI	Driving While Intoxicated
ECCTA	Eastern Contra Costa Transit Authority
FTA	Federal Transit Administration
IIPP	Injury Illness Prevention Plan
MTC	Metropolitan Transportation Commission
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
SMS	Safety Management System
SOP	Standard Operating Procedure
SWPP	Storm Water Prevention Plan
TAM	Transit Asset Management
TSI	Transportation Safety Institute

Organizational Chart

Tri Delta Transit Organizational Chart
Revised 2/2022



Appendix A

Employee Reporting Program

Near Miss and Hazard Reporting

CATEGORY	DEFINITION
Hazard Report	A report of a hazardous condition that has potential to cause injury to people whether within your place of work on a vehicle or en route
<p>Please use to report anything that may cause harm in the near future.</p>	
Safety Issues	A report on any safety issue that has a specific cause - e.g. maintenance, housekeeping, environment and behaviour
<p>Please use to report any safety or security issue that may cause injury or property damage.</p>	
Near Miss Report	An incident that could have resulted in an injury within your place of work on a vehicle or en route
<p>Please use to report an event you witnessed where no harm was caused, but there was the potential to cause injury or ill health – a dangerous occurrence.</p>	

Near miss and hazard reporting



Date / / Near miss report Hazard report

Name

Location

Observation(s)

Actions required

Who is to complete the action(s)?

Contractor Employee Visitor Other



Please use the Near Miss and Hazard Reporting slips. If you need more, please see a manager or supervisor.



Think Safe, Act Safe, Be Safe!

Image from operations contractor, First Transit's Safety Plan



Tri Delta Watch

Powered by ELERTS Corp.



**Your road
to reporting...**



Report your concerns!

If you have concerns about these or any other issues, contact the Ethics Hotline. It's operated by an external company, not by FirstGroup, so you can confidentially report a concern and remain anonymous. The Hotline is open 24 hours a day, every day of the year.

ETHICS HOTLINE: 3 ways to report

CALL: **1-877-322-5534**

VISIT: www.ethicsfirst.ethicspoint.com

EMAIL: compliance@firstgroup.com

Take Action!

Got a QR reader? You can also report anonymously by using a smart device to scan the QR code. Visit the ethics page and anonymously file a report. Any day. Any time.



Image from operations contractor, First Transit's Safety Plan



UNSAFE CONDITIONS REPORT

NAME: <i>OPTIONAL</i>	DATE :
--------------------------	--------

HAS SUPERVISOR BEEN NOTIFIED OF SAFETY CONCERN? YES / NO

IF YES, PLEASE DETAIL ACTIONS TAKEN:

SPECIFIC CONCERN/ HAZARD:	HAZARD TYPE – CIRCLE ONE
	<ul style="list-style-type: none"> • IMMEDIATE THREAT TO LIFE • POTENTIAL THREAT TO LIFE OR SERIOUS INJURY • ERGONOMIC • MINOR HAZARD-INJURY UNLIKELY

RECOMMENDATION FOR CORRECTION:

SUBMIT COMPLETED FORM TO THE MANAGER OF ADMINISTRATIVE SERVICES

- ACTION TAKEN:**
- () Referred to _____ for investigation
 - () Action taken _____
 - () No action taken. Why? _____

WHITE COPY – MANAGER OF ADMINISTRATIVE SERVICES
Effective 5/2020

YELLOW COPY – EMPLOYEE
Injury and Illness Prevention Plan

SUGGESTION

Instructions: Write your suggestions clearly indicating exactly what is to be done. If you need more space or it is necessary to draw a sketch use the back of this form or attach a sheet of plain paper.

My
Suggestion
Is... _____

My
Suggestion
Will
Accomplish
The
Following... _____

OPTIONAL

NAME _____

DATE SUBMITTED _____

SIGNATURE _____

Appendix B

Systems Hazards Sheet

D #	<input type="text"/>
Opened Date	<input type="text"/>
Closed Date	<input type="text"/>
Reported By	-- Please Select One --
Risk Description	<input type="text"/>
Bus #	-- Please Select One --
Location	<input type="text"/>
Current Status	(All)
Likelihood of Occurrence	-- Please Select One --
Risk Severity	-- Please Select One --
Risk Assessment	<input type="text"/>
Risk Impact	<input type="text"/>
Risk Area	-- Please Select One --
Notes & Comments	<input type="text"/>
Notes & Comments Doc.	<input type="button" value="Browse..."/> No file selected No Document Available
Manager Assignment	-- Please Select One --
Manager Comments	<input type="text"/>
Manager Comment Log	<input type="text"/>
<input type="checkbox"/> Manager Review Complete?	<input type="checkbox"/> Employee Review Complete?
Risk Response Strategy	-- Please Select One --
Response Strategy	<input type="text"/>

Appendix C

ECCTA Training Program

**ECCTA/Tri Delta Transit
Employee Training Matrix**

Training	Administration	Maintenance	Timing
Fire Extinguisher	X	X	Annually
Hazard Communication	X	X	Annually
Spill Prevention Control Plan		X	Annually
Spill Containment, Control, and Cleanup		X	Annually
Storm Water Pollution Prevention Plan		X	Annually
Underground Storage Tank Safety Training – including alarms and leaks		X	Annually
Heat Illness Prevention		X	Annually
Bloodborne Pathogens	X	X	Annually
Emergency Evacuation Plan	X	X	Biannually
Sexual Harassment	X	X	Every two years
Violence in the Workplace	X	X	Every two years
Drug and Alcohol Program	X	X	Every two years
Safety Management System (SMS) and De-escalation Training	X	X	Every two years
Security and Emergency Preparedness Program	X	X	Every three years

Appendix D

Resolution

**RESOLUTION #220928D
EASTERN CONTRA COSTA TRANSIT AUTHORITY (TRI DELTA TRANSIT)
SAFETY PLAN**

Resolution #220928D accepts Eastern Contra Costa Transit Authority’s 2022 Safety Plan.

WHEREAS, in accordance with the Federal Transit Administration’s Public Transportation Agency Safety Plan (PTASP) Final Rule (49 CFR Part 673), which became effective on July 19, 2019; and

WHEREAS, the PTASP compliance deadline was extended from July 20, 2020 to July 20, 2021 due to the COVID-19 pandemic; and

WHEREAS, on November 15, 2021 President Biden signed into law the Bipartisan Infrastructure Law which amends FTA’s safety program at 49 U.S.C. § 5329(d) by adding to the PTASP requirements; and

WHEREAS, the PTASP rule applies to all operators of public transportation systems that are recipients and sub-recipients of federal financial assistance under the Urbanized Area Formula Program (49 USC § 5307); and

WHEREAS, Eastern Contra Costa Transit Authority (ECCTA) is a recipient of federal financial assistance under the Urbanized Area Formula Program (49 USC § 5307); and

WHEREAS, ECCTA developed its initial Agency Safety Plan in 2019 and is required to review, update as needed, and certify the Agency Safety Plan annually; and

WHEREAS, at the annual review, ECCTA made updates to the plan to meet the requirements of the Bipartisan Infrastructure Law; and

WHEREAS, ECCTA’s Safety Committee is compliant with 49 U.S.C. § 5329(d)(5) and approved ECCTA’s 2022 Safety Plan on August 10, 2022, prior to approval by the Board of Directors; and

WHEREAS, ECCTA communicated the Safety Management Policy Statement to the Board of Directors and throughout the agency.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Directors of the Eastern Contra Costa Transit Authority to adopt Resolution #220928D accepting ECCTA’s 2022 Safety Plan.

PASSED AND ADOPTED THIS 28th day of September 2022, by the following votes:

EASTERN CONTRA COSTA TRANSIT AUTHORITY

Anissa Williams, Chair

Rashidi Barnes, Chief Executive Officer

AYES: _____

ABSENT: _____

NOES: _____

ABSTENTIONS: _____

Appendix E

Certification

**Eastern Contra Costa Transit Authority (Tri Delta Transit)
Public Transit Agency Safety Plan (PTASP)
CERTIFICATION**

Eastern Contra Costa Transit Authority (ECCTA) complies with all sections of the Federal Transit Administration’s (FTA) 49 C.F.R Part 673. The agency complies with section 673.21 by establishing and implementing a Safety Management System (SMS). The SMS is appropriately scaled to the size, scope, and complexity of our transit system and includes the following elements:

- Safety Management Policy as described in 673.23
- Safety Risk Management as described in 673.25
- Safety Assurance as described in 673.27
- Safety Promotion as described in 673.29

As defined by 673.23, ECCTA identifies the Chief Executive Officer as the Accountable Executive responsible for ensuring that SMS is effectively implemented throughout the agency and the Chief Executive Officer designates the Executive Assistant as the SMS Executive.

Anissa Williams, Chair

Date

Rashidi Barnes, Chief Executive Officer

Date