Waukesha Metro Transit

Public Transportation Agency Safety Plan

LAST UPDATED: September 28, 2022
June 22, 2022
April 22, 2022
February 22, 2021
May 6, 2020

The WisDOT Public and Specialized Transit section, in collaboration with several local partners and stakeholders, created the WisDOT Public Transportation Agency Safety Plan template to fulfill its regulatory requirements under 49 CFR Part 673.

Once a provider completes its own plan (based on WisDOT's template), the provider is responsible to carry out the plan.

> **49 CFR 673.11(d)**
> A State must draft and certify a Public Transportation Agency Safety Plan on behalf of any small public transportation provider that is located in that State. A State is not required to draft a Public Transportation Agency Safety Plan for a small public transportation provider if that agency notifies the State that it will draft its own plan. **In each instance, the transit agency must carry out the plan.** If a State drafts and certifies a Public Transportation Agency Safety Plan on behalf of a transit agency, and the transit agency later opts to draft and certify its own Public Transportation Agency Safety Plan, then the transit agency must notify the State. The transit agency has one year from the date of the notification to draft and certify a Public Transportation Agency Safety Plan that is compliant with this part. The Public Transportation Agency Safety Plan drafted by the State will remain in effect until the transit agency drafts its own Public Transportation Agency Safety Plan.

PUBLIC TRANSPORTATION AGENCY SAFETY PLAN for WAUKESHA METRO TRANSIT

TRANSIT AGENCY INFORMATION

Waukesha Metro Transit	**Name**		**Address**
	Waukesha Metro Transit and Professional Transit Management of Waukesha, Inc.		2311 Badger Drive, Waukesha, WI 53188-5932
Accountable Executive	**Name**		**Title**
	Brian Engelking		Transit Manager
Chief Safety Officer	**Name**		**Title**
	Donald G Jans		Compliance Specialist
Mode(s) of Service Covered by This Plan:		**List All FTA Funding Types (e.g., 5307, 5337, 5339):**	
MB, Paratransit, CB			
Mode(s) of Service Provided by the Waukesha Metro Transit (Directly operated or contracted service)			
Motor Bus, Paratransit, Commuter Bus			
Does the agency provide transit services on behalf of another entity?	**Yes**	**No**	**Description of Arrangement(s)**
	X		Professional Transit Management of Waukesha, Inc (PTMW) operates Waukesha Metro Transit (Metro) for the City of Waukesha. PTMW.'s parent company, Transdev, is under contract with the City of Waukesha. The City Transit Manager and PTMW staff oversee the Waukesha County Commuter Service through an inter-governmental agreement between the City of Waukesha and Waukesha County. The City of Waukesha Transit Commission acts as the policy board for Metro.
Waukesha Metro Transit(ies) or Entity(ies) for Which Service Is Provided	**Name**		**Address**
	Waukesha Metro Transit		2311 Badger Drive, Waukesha, WI 53188-5932
	Waukesha County Transit Service		

PLAN DEVELOPMENT, APPROVAL, AND UPDATES

Signature by the Accountable Executive	**Name**	**Date of Signature**
	Brian Engelking, Transit Manager	
	Signature	
Approval by Mayor	**Approving Entity**	**Date of Approval**
	Shawn Reilly, Mayor	
	Signature	

ACTIVITY LOG

Version Number and Updates *Complete history of successive versions of this plan*			
Version No.	**Section/Pages Affected**	**Reason for Change**	**Date Issued**
001-2020	All	Initial Creation	05/06/2020
	All	PTASP Signed and Adopted	06/03/2020
	All	Certification on TRAMS / FTA	
	All	PTASP-TAC Voluntary Review Submitted	10/22/2020
	All	PTASP-TAC Voluntary Review Received	11/03/2020
	Targets S3.2.1, P21	Targets Defined	11/11/2020
	All	Annual Review – No Adjustments made	2/22/2021
	All	Annual Review – Personnel and policy Changes	4/22/2022
	All	Safety Committee Involvement	6/22/2022
	All	Final Plan reviewed and recommended by SC	9/28/2022

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DEFINITIONS AND ACRONYMS

The following definitions may be used throughout this document, and correspond to the definitions provided in 49 CFR 673.5.

Accident means an "event", as defined below, that involves any of the following:

1. A loss of life,
2. A report of a serious injury to a person,
3. A collision of public transportation vehicles,
4. A runaway train,
5. An evacuation for life safety reasons, or
6. Any derailment of a rail transit vehicle (any location, any time, any cause).

Accountable Executive means a single, identifiable individual who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan (as defined below) of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan (as defined below), and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

Chief Safety Officer means an adequately trained individual who has responsibility for safety and reports directly to a Waukesha Metro Transit's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a management firm operating Waukesha Metro Transit that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

Equivalent Authority means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.

Event means an "accident", as defined above, or "incident" or "occurrence" (each as defined below).

FTA means the Federal Transit Administration, an agency within the United States Department of Transportation.

Hazard means 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 (as defined below).

Incident means an "event" (as defined above), that involves any of the following:

1. A personal injury that is not a serious injury,
2. One or more injuries requiring medical transport, or
3. Damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a Waukesha Metro Transit.

Investigation means the process of determining the causal and contributing factors of an "accident", "incident", or "hazard" (each as defined here), for the purpose of preventing recurrence and mitigating risk.

National Public Transportation Safety Plan means the plan to improve the safety of all public transportation systems that receive federal financial assistance under 49 U.S.C. Chapter 53.

Occurrence means an "event" (as defined above), without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a Waukesha Metro Transit.

Operator of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302(14).

Performance measure means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

Performance target means 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).

Public Transportation Agency Safety Plan means the documented comprehensive agency safety plan for a Waukesha Metro Transit that is required by 49 U.S.C. 5329 and this part.

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation means a method or methods to eliminate or reduce the effects of hazards.

Safety Assurance means processes within a Waukesha Metro Transit's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the Waukesha Metro Transit meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Management Policy means a Waukesha Metro Transit's documented commitment to safety, which defines the Waukesha Metro Transit's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

Safety Management System (SMS) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a Waukesha Metro Transit's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

Safety performance target means a Performance Target related to safety management activities.

Safety Promotion means a combination of training and communication of safety information to support SMS as applied to the Waukesha Metro Transit's public transportation system.

Safety risk assessment means the formal activity whereby a Waukesha Metro Transit determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management means a process within a Waukesha Metro Transit's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious injury means any injury which:

1. Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received;
2. Results in a fracture of any bone (except simple fractures of fingers, toes, or 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.

Small public transportation provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

State means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

State of good repair means the condition in which a capital asset is able to operate at a full level of performance.

Waukesha Metro Transit means an operator of a public transportation system.

Transit Asset Management Plan means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.

CFR	-	Code of Federal Regulations
CSO	-	Chief safety officer
FTA	-	Federal Transit Administration
MAP-21	-	Moving Ahead for Progress in the 21st Century
NTD	-	National Transit Database
PTASP	-	Public transportation agency safety plan
SGR	-	State of good repair
SMS	-	Safety management system
SOP	-	Standard operating procedure
TAM	-	Transit asset management
U.S.C.	-	United States Code

BACKGROUND

The Moving Ahead for Progress in the 21st Century (MAP-21) Act grants the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive regulatory framework to oversee the safety of public transportation throughout the United States. As a component of this safety oversight framework, MAP-21 requires certain recipients of FTA Chapter 53 funding to develop and implement a Public Transportation Agency Safety Plan (PTASP).

In addition to greater safety oversight responsibilities, MAP-21's grant of expanded regulatory authority puts FTA in a position to provide guidance to transit agencies that strengthens the use of safety data to support management decisions, improves the commitment of transit leadership to safety, and fosters a culture of safety that promotes awareness and responsiveness to safety risks. The framework to this approach is called a safety management system (SMS), which moves the transit industry towards a more holistic, performance-based approach to safety. The SMS framework has been adopted by FTA in its National Public Transportation Safety Plan ("national safety plan").

The PTASP for Metro supports and is consistent with an SMS approach to safety risk management. SMS is an integrated collection of policies, processes, and behaviors meant to ensure a formalized, proactive, and data-driven approach to safety risk management. The aim of an SMS is to increase the safety performance of transit systems by proactively identifying, assessing, and controlling safety risks. The approach is meant to be flexible and scalable, so that transit agencies of all types and sizes can efficiently meet the basic requirements of MAP-21. The PTASP for Metro addresses the following elements, outlined in **Table 1** (below):

☐	**Safety Management Policy Statement:**	A policy statement establishing senior management commitment to continual safety improvement, signed by the executive accountable for the operation of the agency and the board of directors.
☐	**Document Control:**	A description of the regular annual process used to review and update the plan including a timeline for implementation of the process.
☐	**Core Safety Responsibilities:**	A description of the responsibilities, accountabilities, and authority of the accountable executive, the key safety officers, and key members of the safety management team.
☐	**Safety Training Program:**	A description of the comprehensive safety training program for agency staff that ensures that staff are trained and competent to perform their safety duties.
☐	**Safety Risk Management:**	A description of the formal processes the agency uses to identify hazards, analyze and assess safety risks, and develop, implement and evaluate risk controls.
☐	**Safety Risks:**	A description the most serious safety risks to the public, personnel and property.
☐	**Risk Control:**	A description of the risk control strategies and actions that the agency will undertake to minimize exposure of the public, personnel and property to hazards, including a schedule for implementing the risk control strategies and the primary entity responsible for each strategy.

☐	**Safety Assurance:**	A list of defined safety performance indicators for reach priority risk and associated targets the agency will use to determine if it is achieving the specified safety goals.
☐	**Desired Safety Outcomes:**	A description of desired safety outcomes for each risk using the measurable safety performance indicators established.

Table 1: Elements of a Public Transportation Agency Safety Plan (PTASP)

1 SAFETY POLICIES AND PROCEDURES

1.1 COMMITMENT TO SAFETY

Waukesha Metro Transit's Policy Statement

Metro recognizes that the management of safety is a core value of our business. The management team at Metro will embrace the Safety Management System (SMS) and is committed to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our employees, customers, and the general public. All levels of management and frontline employees are committed to safety and understand that safety is the primary responsibility of all employees.

Waukesha Metro Transit is committed to:

- Communicating the purpose and benefits of the SMS to all staff, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.
- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.
- Ensuring that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.
- Establishing safety performance targets that are realistic, measurable, and data driven.

- Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.

1.2 Annual PTASP Review and Update

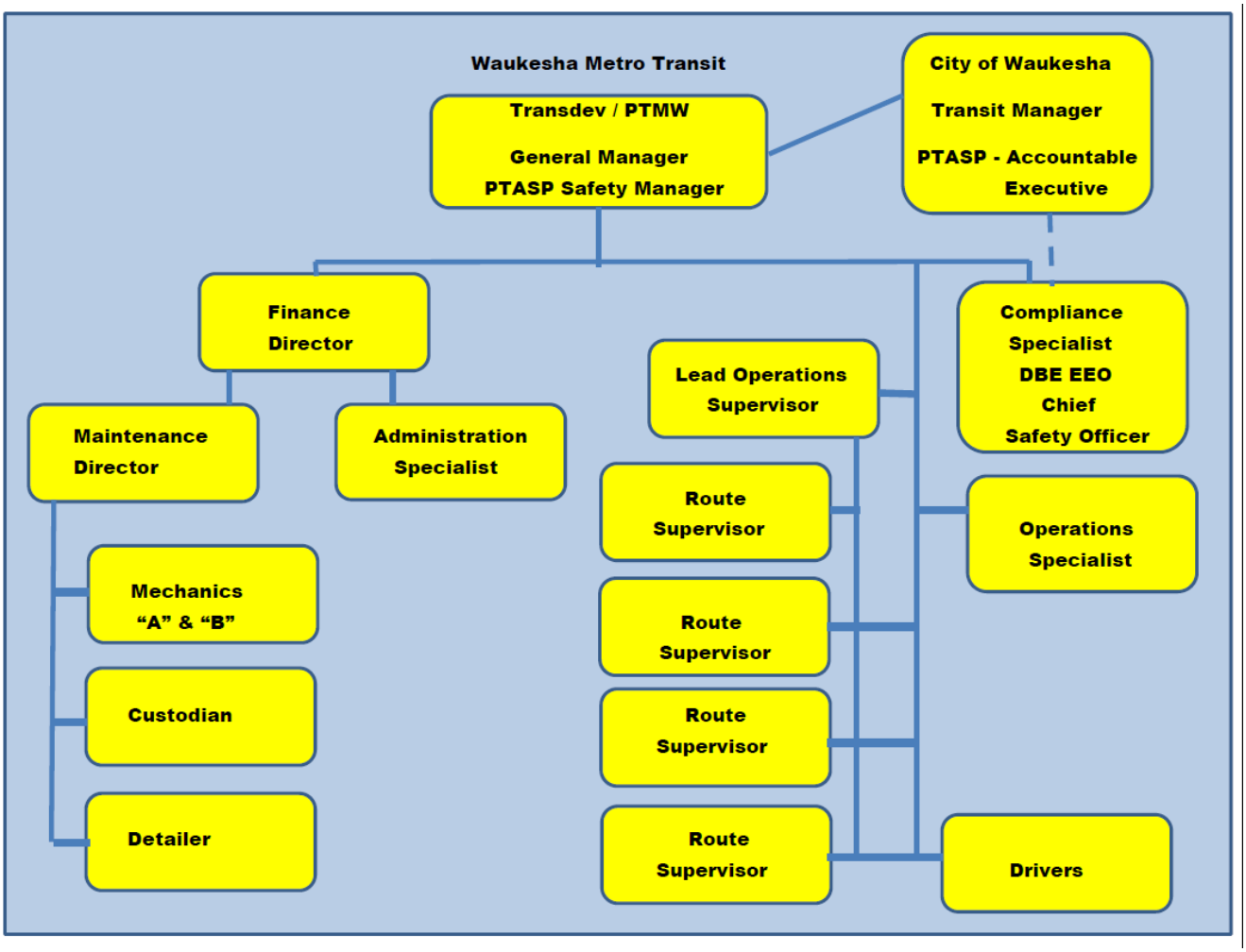
Metro's management will review the PTASP annually, update the document as necessary, and implement the changes within a timeframe that will allow the agency to timely submit to any annual or other periodic reviews, including its annual self-certification of compliance. At minimum, annual self-certification will consist of both the Accountable Executive and Transit Commission Chair signing and dating this document.

Annual review of the PTASP will be conducted by or within the first sixty days of each calendar year. Necessary updates outside the annual update window may be handled as PTASP addenda. Reviews of the PTASP and any subsequent updates, addenda, adoption, and distribution activities will be documented in the Activity Log at the beginning of this document.

1.3 Organization Structure and System Safety Responsibilities

While the Accountable Executive has the ultimate responsibility for Metro's implementation of its PTASP, Metro's executive management has the overall responsibility of safe and secure operations of Metro and contract service operators. Each employee is required to carry out specific system safety responsibilities, depending on the employee's position, in compliance with the PTASP.

The information provided in the Staff Safety Roles and Responsibilities table (Appendix A) describes each position and general system safety responsibilities, and the agency's reporting structure. Included below is the organizational chart for Waukesha Metro Transit.


Waukesha Metro Transit
Transdev / PTMW
General Manager
PTASP Safety Manager
City of Waukesha
Transit Manager
PTASP - Accountable Executive
Finance Director
Maintenance Director
Administration Specialist
Mechanics "A" & "B"
Custodian
Detailer
Lead Operations Supervisor
Route Supervisor
Route Supervisor
Route Supervisor
Route Supervisor
Compliance Specialist
DBE EEO
Chief Safety Officer
Operations Specialist
Drivers

2 SAFETY RISK MANAGEMENT

2.1 HAZARD IDENTIFICATION

Establishing an effective hazard identification program is fundamental to safety management at Metro's hazard identification can be reactive or proactive in nature: safety event reporting, incident investigation, and trend monitoring are essentially reactive; other hazard identification methods proactively seek feedback through data collection, observation, and day-to-day operations analysis. Common hazard identification activities include:

- Safety assessments
- Trend monitoring
- Hazard and safety event reporting (with causal factor analysis)
- Safety surveys
- Safety audits
- Evaluating customer suggestions and complaints

The number of near-misses, known as accident precursor data, is significantly greater than the number of accidents for comparable types of events. The practice of reporting and learning from accident precursor data is a valuable complement to other hazard identification practices. To be successful, hazard identification must take place within a non-punitive and just safety culture. Metro employs systematic safety improvements by discovering and learning of potential weaknesses in the system's safety.

Waukesha Metro Transit's safety objectives include:

- Metro aims to support a robust safety culture. We will conduct an annual safety culture survey of our employees and share results throughout our organization, working with our employees to develop and track initiatives that support continuous improvement.

- We will support reducing the number of safety events caused by excessive speeds of our transit vehicles.

- For our first annual PTASP, we will reduce safety events overall, as specified in our safety performance targets.

- We are committed to improving our preventative maintenance practices and reducing our annual number of maintenance road calls.

- We plan to double the current level of coaching provided to our operators, enhancing their skills, and making them the safest drivers on the road.

Metro will distribute this Safety Management Policy Statement to each employee and will review it with employees during employee safety meetings and toolbox talks with supervisors. A special session will be conducted with our Transit Commission to review the Policy Statement and discuss SMS implementation.

Safety is a core value of Metro. Metro will use SMS processes to direct the prioritization of safety and allocate our organizational resources-people, processes, and technology-in balance with our other core business functions.

All levels of management are responsible for ensuring the performance of Metro's SMS. Managers must take an active role in the Safety Risk Management (SRM) process and ensure that Safety Assurance (SA) functions are adequately supported. Managers also are responsible for ensuring that SRM is being performed in their operational areas of control so that safety risk associated with safety hazards is assessed and mitigated. As of July 1, 2020, safety performance targets will be an important part of performance evaluations for Metro's managers and employees. All employees and contractors will support safety management by ensuring that safety concerns are identified and reported.

Our overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent to eliminate unacceptable safety risk in our transit operations.

To that end, we will continuously examine our operations for hazards. We will establish a non-punitive employee safety reporting program, train staff on safety management, document our findings and safety risk mitigations, and strive for continuous improvement of our safety performance.

As required by the Federal Transit Administration, we have established annual safety performance targets to help us measure the safety of our transit service. In addition, to address our overall safety objective, we will conduct hazard identification workshops with all frontline, supervisory, and management personnel during this calendar year. We also will work to increase the annual

number of voluntary reports received from employees by 20 percent and actively track our safety risk mitigations. To ensure we meet this objective, our safety department will report out each quarter to our entire agency on the number of:

- Hazard identification workshops carried out in the quarter;
- Number and type of hazard reports received per employee in the quarter, versus the same quarter last year; and
- Number and type of safety risk mitigations implementation in the quarter.

Metro commits to providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team. Metro will ensure that no action will be taken against employees for disclosing safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.

Metro will establish and operate an employee safety reporting program as a fundamental source for safety concerns and hazard identification; and ensure that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

Appendix B provides a Safety Assessment and System Review of Metro. Areas of deficiency and identified hazards will be addressed by this plan. Hazards can be identified by any employee, customer or visitor. Any complaints that are received are logged by the Transportation Supervisors, and the investigation is documented by the investigating Supervisor. Once complete, the complaint is reviewed by the General Manager who must determine the legitimacy of the complaint and the appropriate action to be taken. The General Manager is required to review all complaints with the Transit Manager on a monthly basis.

Appendix C provides a Facility Safety and Security Assessment of Metro. Areas of deficiency and identified hazards will be addressed by this plan. Metro utilizes the Waukesha Police Department to provide a threat and vulnerability assessment of the Transit System properties every three years or as needed. Hazards can be identified by any employee, customer or visitor, or by the Metro Safety Committee. All hazards identified are reviewed by the Maintenance Director, General Manager/Safety Manager,

Compliance Specialist/Chief Safety Officer, and the Transit Manager/Accountable Executive who work to determine the appropriate actions needed to mitigate the hazard in accordance with this PTASP.

2.1.1 Non-Punitive Reporting Policy

Metro is committed to the safest transit operating standards practicable. To achieve this, it is imperative that Metro have uninhibited reporting of all safety events that may compromise safe operations. To this end, every employee is responsible for the communication of any information that may affect the integrity of transit safety. Such communication must be completely free of any form of reprisal.

Metro will not take disciplinary action against any employee for disclosing a safety event. This policy shall not apply to information received by Metro from a source other than the employee, or that involves an illegal act, or a deliberate or willful disregard of rules, regulations, or agency policies or procedures.

Metro's method of collection, recording, and disseminating information obtained from transit safety reports has been developed to protect, to the extent permissible by law, the identity of any employee who provides transit safety information. The non-punitive reporting policy (Appendix I) is described in detail in the document: Professional Transit Management of Waukesha Transportation Policy Procedures Number 129-20.

2.2 SAFETY RISK ASSESSMENT

Once a hazard has been identified, Metro will conduct an assessment to determine the potential consequences. Factors to be considered are the likelihood of occurrence, the severity of the consequences (should there be an occurrence), and the level of exposure to the hazard. Metro will assess risks subjectively by experienced personnel using a risk assessment matrix. Results of the risk assessment process will help determine whether the risk is being appropriately managed or controlled. If the risks are acceptable, the hazard will continue to be monitored. If the risks are unacceptable, steps will be taken by Metro to lower the risk to an acceptable or tolerable level, or to remove, avoid, or otherwise eliminate the hazard.

2.3 SAFETY RISK MITIGATION

The assessment process may indicate that certain hazards have an acceptable level of risk, while others require mitigation to an acceptable or tolerable level. Metro will further manage risk by completing a **Hazard Assessment Log (Appendix E)** that can help prioritize safety risks. The level of risk can be lowered by reducing the severity of the

potential consequences, likelihood of occurrence, exposure to that risk, or by some combination.

In general, Metro will take the following safety actions to mitigate risk – these actions can be categorized into three broad categories, including:

1. **Physical Defenses:**
   These include objects and technologies that are engineered to discourage, or warn against, or prevent inappropriate action or mitigate the consequences of events (e.g. traffic control devices, fences, safety restraining systems, transit controls/signals, transit monitoring systems, etc.)
2. **Administrative Defenses:**
   These include procedures and practices that mitigate the likelihood of accident/incident (e.g. safety regulations, standard operating procedures, personnel proficiency, supervision inspection, training, etc.)
3. **Behavioral Defenses:**
   These include behavioral interventions through education and public awareness campaigns aimed at reducing risky and reckless behavior of motorists, passengers and pedestrians; factors outside the control of the agency (e.g. the *Zero in Wisconsin* campaign)

2.4 Safety Risk Prioritization

Once a hazard has been identified and the risk level assessed, Metro will prioritize safety risks.

A **Prioritized Safety Risk Log (Appendix F)** is used to organize Metro's safety risks. The Prioritized Safety Risk Log should identify:

- The priority level for safety risks
- A description of the risk
- Planned mitigation strategies to address the risk
- The outcome of the planned mitigation strategies
- Responsible staff
- A timeline of the planned mitigation strategies
- The status of the prioritized safety risk

Metro will update the Prioritized Safety Risk Log frequently to ensure continual progress towards risk reduction.

3 SAFETY ASSURANCE

Safety assurance provides the necessary feedback to ensure that the SMS is functioning effectively and that Metro is meeting or exceeding its safety objectives. Safety assurance requires a clear understanding of how safety performance will be evaluated, or in other words, what metrics will be used to assess system safety and determine whether the SMS is working properly. Having decided on the metrics by which success will be measured, safety management requires embedding these metrics in the organizational culture and encouraging their use for ongoing performance improvement.

3.1 DEFINING SAFETY GOALS AND OBJECTIVES/OUTCOMES

Setting safety goals and objectives is part of strategic planning and establishing safety policy for Metro Clearly defining safety goals is the first part in creating a safety performance measurement system.

Safety goals are general descriptions of desirable long-term impacts. For example, a general safety goal might be:

> *"Foster agency-wide support for transit safety by establishing a culture where management is held accountable for safety and everyone in the organization takes an active role in securing transit safety."*

Safety objectives or outcomes are more specific statements that define measurable results. For example, a specific safety objective for the goal stated above might be:

> *"Establish regular transit safety meetings comprised of staff at varying levels, including executives, officers, managers, operators and maintenance personnel."*

The safety objective/outcome will then be measured by defining specific performance metrics, including a baseline and target, that Metro will determine is reasonable.

3.2 DEFINING SAFETY PERFORMANCE MEASURES

Performance measurement is the regular systematic collection, analysis, and reporting of data that track resources used, work produced, and whether specific outcomes were achieved. In other words, it is a tool to quantify and improve performance, and engage and communicate with Metro staff and external stakeholders. Collection of data is a

critical component of the performance measurement process and analysis of accident performance depends on collecting information through the accident investigation process. Appendix J – Accident Procedures Metro outline the procedures used by the Transportation Supervisors when investigating accidents involving Metro equipment and employees. Another source of data is the Transit Mutual Insurance Loss Run that is provided to Metro on a monthly basis by the liability insurance carrier. This report, Appendix L, 03-20 Mar WAK Monthly Loss Run, provides an overview of the system's accident claim performance for the current year to date. Additionally, Metro tracks LL accidents in an annual spreadsheet, Appendix K – Master ACCREV2020, which is used to analyze safety performance and to assess and develop corrective actions.

The two core functions of performance measurement include monitoring and evaluating progress. Performance can be measured in terms of inputs, outputs, outcomes, and efficiency, among many other criteria.

Metro will utilize these basic principles of performance measurement, including:

- Stakeholder involvement and acceptance
- Focus on agency goals and activities
- Clarity and precision
- Creditability and robustness
- Variety of measures
- Number of measures
- Hierarchy of measures
- Forward-looking measures
- Integration into agency decision-making
- Timely reporting
- Understand agency specifics, including context and scale of operations
- Realism of goals and targets

3.2.1 Metrics

System safety data can be collected through a variety of sources, including:

- Near miss information
- Accident investigation reports (with causal factor analysis)
- Internal safety audits (or reviews)
- Safety committee meetings
- Injury reports (including occupational injury)
- Safety event reports (including accidents, incidents, and occurrences)
- System monitoring (including testing and inspection records)
- Hazard management program

This safety data will be analyzed and used for development of key safety performance indicators and targets.

Metro will initially focus on areas based on data delivered to the National Transit Database (NTD), as the following:

- **Fatalities**
    1. Total number of reportable fatalities
    2. Rate of reportable fatalities per total vehicle revenue miles
- **Injuries**
    3. Total number of reportable injuries
    4. Rate of reportable injuries per total vehicle revenue miles
- **Safety Events**
    5. Total number of reportable safety events
    6. Rate of reportable safety events per total vehicle revenue miles
- **System Reliability**
    7. Mean distance between major mechanical failures

These safety performance measures are used to select improvement targets for these four measures and for each mode of transit, in order to encourage improvements and monitor the safety performance of delivering transit services. In addition, Metro will select additional performance measures and targets, both leading and lagging, to insure continual improvement of our SMS.

Metro will make its safety performance measures improvement targets available to applicable state agencies and metropolitan planning organizations (MPOs), and, to the maximum extent practicable, will coordinate with both in the selection of safety performance targets. Targets will be adopted into local Transportation Improvement Plans (TIP) or TIP amendment.

As identified in the Public Transportation Agency Safety Plan (PTASP) regulation (49 C.F.R. Part 673), the Southeastern Wisconsin Regional Planning Commission (SEWRPC), as the Metropolitan Planning Organization (MPO) for the seven county southeastern Wisconsin area, will integrate transit agency performance targets and performance plans into VISION 2050, the regional land use and transportation system plan for Southeastern Wisconsin and the regional transportation improvement Program (TIP). The Commission will include a description in the TIP of how the programmed projects promote the achievement of the highway and transit performance targets, including the established regional transit safety performance targets.

Consistent with the Cooperative Agreement for Continuing Transportation Planning for the Southeastern Wisconsin Region, entered into on January 21, 2020, and the Performance Measure Cooperation Written Documentation, finalized on April 26, 2018, the Commission will cooperatively establish performance targets, share data, and prepare system performance reports in coordination with the Wisconsin Department of Transportation (WisDOT) and transit operators.

As part of this cooperative process, transit operators will share transit safety performance data and targets with SEWRPC to assist with the development of initial regional safety performance targets for consideration by transit operators in the Region. SEWRPC will coordinate with transit operators on the development of the regional transit safety performance targets, to be completed by January 20, 2021. The final transit safety performance targets will be integrated into VISION 2050 and the TIP by July 20, 2021.

The safety data collected from the above sources will be analyzed for potential safety impacts. Identified areas of concern are reported to appropriate personnel in the form of specific project reports, memos, and recommendations from the safety committee.

Records of system safety data are maintained for a minimum of three years. Certain information, such as safety certification backup documentation is maintained by Metro's document control process. In addition to safety data, Metro maintains other data and documentation of activities required by the PTASP. Distribution of safety-related reports and data is accomplished through the Metro's safety committee.

Annual Safety Performance Targets referenced below can be in Appendix N.

Annual Safety Performance Targets based on the safety performance measures established under the National Public Transportation Safety Plan.							
Mode of Service	Fatalities (Total)	Fatalities (per 100k VRM)	Injuries (Total)	Injuries (per 100k VRM)	Safety Events (Total)	Safety Events (per 100k VRM)	System Reliability (VRM / failures)
Fixed Route							
ADA / Paratransit							

3.3 Monitoring Performance and Evaluating Results

Once safety goals, objectives/outcomes, and measures have been defined, they can be organized into a **Safety Performance Matrix (Appendix G)** or **Safety Performance Outline (Appendix F)**. Organizing information, particularly in a matrix, will allow Metro to continuously monitor safety performance and evaluate results. Metro will evaluate safety performance and update documentation at least semi-annually.

Metro will monitor the system for compliance in the following ways:

1. **Safety Performance Monitoring**
    a. Maintenance Records; repairs, inspections, road calls, maintenance training
    b. Operations Records; new employee training, employee refresher training, supervisor training, complaint logs including investigation and actions taken documentation, accident records and accident log from the property (Appendix K – Master ACCREV2020), TMI monthly loss runs (Appendix I – 03-20 Mar WAK – Monthly Loss Run), daily operation reports.
    c. Communications through safety committees, one on one conversations, near miss reporting, road-supervision, ride checks, trail checks, video from on-board and security cameras, On-Board Ride Checks (Appendix L – Transit Mutual Ride Check).
    d. Operational changes; route changes, schedule changes, equipment changes, environmental changes.

2. **Monitor the safety risks identified and the system safety performance. Identify mitigation procedures to address the safety risks and improve the safety performance through review of the records available as described in item 1.**

    Sample: passenger falls on moving vehicles = safety risk.

    a. Procedure to mitigate the safety risk = educate the riding public to remain seated while the bus is in motion.
    b. Create and install signage on vehicles requesting that passengers remain seated while the vehicle is in motion.

c. Train the operators to communicate with the passengers to remain seated and offer a reminder if they see a passenger getting up while the vehicle is in motion.
d. Monitor the effects of the educational efforts and determine if there is a change in the number of occurrences of passengers falling while the vehicle is in motion. If the number of occurrences decrease, it is indicating that the mitigation is working. If the number of occurrences fail to decrease, it is indicating that the mitigation needs adjustment.
e. Documentation of the process, review of the data and the findings must be recorded.

3. Create benchmarks for monitoring the continuous improvement of the system's performance.

Samples of measurements and benchmarks:

Measure activity compared to an established goal/benchmark set by the system

a. Valid complaints received
b. Accidents per (XXX) miles operated
c. Preventable accidents per month/year/YTD
d. Non-Preventable accidents per month/year/YTD
e. Number of claims submitted by type per month/year/YTD
f. Number of claims submitted by type, and claim payment per month/year/YTD
g. Number of claims submitted by type, and no claim payment per month/year/YTD
h. Number of near miss incidents per month/year/YTD

4. Monitor the effects of the safety promotion. Is the promotion (message) successful in improving the system's safety performance. Use the feedback to determine if the promotion, or the procedures, or both must be adjusted for continuous improvement.

5. Review all mitigations, policies and procedures on a periodic basis documenting the review and the findings of the review. The Chief Safety Officer and the Safety Manager are responsible for the review and documentation of the findings on a quarterly basis.

6. The Chief Safety Officer and the Safety Manager will review the findings with proposed changes with the Accountable Executive and other SRM team members.

3.4 Integrating Results into Agency Decision-Making Processes

Metro is committed to using the data collected and information learned to inform decision-making and instill positive change. The main objective is the continuous improvement of transit system safety. When performance goals are not met, Metro will work to identify why such goals were not met and what actions can be taken to minimize the gap in achieving defined goals. However, when goals are easily achieved, action will be taken to exceed expectations and re-establish a reasonable baseline.

Uses of performance results include:

- Focus attention on performance gaps and trigger in-depth investigations of what performance problems exist
- Help make informed resource allocation decisions
- Identify needs for staff training or technical assistance
- Help motivate employees to continue making program improvements
- Support strategic planning efforts by providing baseline information for tracking progress
- Identify best practices through benchmarking
- Respond to elected officials and the public's demand for accountability

3.5 Sustaining a Safety Management System

In order to sustain the SMS, Metro will ensure that particular processes are employed to instill an organizational foundation. Examples of actions taken to sustain the SMS include:

- **Create measurement-friendly culture:**
  All staff, including senior managers, should be actively engaged in creating measurement-friendly culture by promoting performance measurement as a means of continuous improvement. Senior managers will also lead by example and utilize performance metrics in decision making processes.

- **Build organization capacity:**

Investment in developing skilled human resources capacity is essential to sustaining an SMS. Both technical and managerial skills will be needed for data collection and analysis, and setting goals. Managing staff and the governing board will commit the financial resources required for organizational capacity and maintaining an SMS on a continuous basis.

- **Reliability and transparency of performance results:**
  The SMS will be able to produce and report its results, both good and bad. Performance information should be transparent and made available to all stakeholders. Messengers should be protected to preserve the integrity of the measurement system. The focus should be on opportunities for improvement rather than allocating blame.

- **Demonstrate continuous commitment to measurement:**
  Visible commitment to using metrics is a long-term initiative. Metro will demonstrate a commitment to performance measurement by establishing a formal process of reporting performance results, such as reporting transit safety and performance measurement to the Waukesha Transit Commission.

4 SAFETY PROMOTION

4.1 SAFETY PROMOTION, CULTURE, AND TRAINING

Metro believes safety promotion is critical to the success of an SMS by ensuring that the entire organization fully understands and trusts its safety policies, procedures, and structure. Further, safety promotion involves establishing an organizational and workplace culture that recognizes safety as a core value, training employees in safety principles, and allowing open communications of safety issues.

4.1.1 Safety Culture

Positive safety culture must be generated from the top. The actions, attitudes, and decisions at the policy-making level must demonstrate a genuine commitment to safety. Safety must be recognized as the responsibility of each employee, with the ultimate responsibility for safety resting with the Accountable Executive. Employees must trust that they will have management support for decisions made in the interest of safety, while also recognizing that intentional breaches of safety will not be tolerated.

The primary goal of safety promotion at Metro is to develop a positive safety culture that allows the SMS to succeed. A positive safety culture is defined as one which is:

A. An Informed Culture

- Employees understand the hazards and risks involved in their areas of operation
- Employees are provided with the necessary knowledge, training and resources
- Employees work continuously to identify and overcome threats to safety

B. A Just Culture

- Employees know and agree on what is acceptable and unacceptable behavior
- Human errors must be understood, but negligence and willful violations cannot be tolerated

C. A Reporting Culture

- Employees are encouraged to voice safety concerns and to share critical safety information without the threat of punitive action
- When safety concerns are reported, they are analyzed, and appropriate action is taken

D. A Learning Culture

- Learning is valued as a lifetime process beyond basic-skills training
- Employees are encouraged to develop and apply their own skills and knowledge to enhance safety
- Employees are updated on safety issues by management, and safety reports are fed back to staff so that everyone learns the pertinent lessons

Metro Safety Promotion activities and processes include methods for implementing safety hazard identification, risk assessment, risk mitigation:

Hazard Identification

1. **Safety committee**: body made up of 2 transit bus operators, 2 maintenance personnel, 1 Administration and 1 safety supervisor. Topics of discussion to include:

    A. Historical safety records
    B. Accident trends analyses
    C. Employee complaints/suggestions
    D. Employee near miss reporting
    E. Past incidents/accidents
    F. Other perceived safety items

Committee meets on a quarterly basis, or more frequently as needed to discuss issues of potential hazards/accident trends/employee suggestions etc. Committee is also a conduit to employees for discussing privately near misses or unsafe acts. The Safety Committee also is a key to the development and the implementation of this PTASP and is the first step in the approval process of the plan before submission to the Board for approval.

2. **Critical safety behaviors (csb**): a system to help identify and record certain unsafe behaviors. Designed by the management team and implemented for observation. examples:

    A. Work area/ site inspections
    B. Welcome creative thinking about what could go wrong
    C. Identified hazards to be documented and observed regularly
    D. Employee input (survey or questionnaire)
    E. Daily safety walkthrough checklist - Transportation Supervisors are responsible for the daily walkthrough at the Transit Center. The Maintenance Director is responsible for the daily walkthrough at the Mainternance and Operations Facility on Badger Drive.

Critical safety behaviors should be reviewed and updated as a facilities' needs change. Management and safety should update regularly

Risk Assessment

1. **Risk management assessment (rma):** format for determining risk associated with certain types of actions. topics of discussion to include:

    A. Properly trained to perform such task
    B. Perform the task without assistance
    C. Severity of risk
    D. Actions taken to control the risk
    E. Are existing control measures adequate
    F. Corrective actions to be performed
    G. Contributing factors
    H. How often a task is performed

A risk assessment should be documented and reviewed for all jobs deemed to be a safety risk by management/safety committee.

Safety Risk Mitigation

1. **Training**: training is a primary component to mitigating risk at a site. it is imperative to find the hazard, assess the risk of it, and then properly train to reduce that risk: suggestions for standard training:

A. New hire classroom training to include defensive driving, distracted driving, operator fatigue, ADA law, customer service.
B. New hire behind the wheel training to include left/right turns, backing, intersections, railroad crossings, defensive driving, bus stop procedures, emergency management, and transit security
C. OSHA training for general industry
D. global harmonizing system (sds)
E. Forklift training/certification
F. Hazardous chemical training
G. Risk management assessment
H. Quarterly safety meetings
I. Retraining for accidents and incidents
J. Remedial action training for employees who get injured on the job

4.1.2 Training

During the initial implementation of an SMS, specific training will be required for all employees and contract staff, to explain the agency's safety culture and describe how Metro's SMS works. The Chief Safety Officer is the resource person for providing a corporate perspective on Metro's approach to safety management.

All new employees undergo defensive driver training through the Transdev Operator Development Program. New employees complete the three to four-week training class which includes behind-the-wheel training.

Metro training provides the necessary tools to pass the CDL drivers' test in addition to the skills needed to become a fixed route bus operator as well as a paratransit bus operator. All initial behind-the-wheel training is conducted with the Training Supervisor.

Once the employee has obtained the CDL license, and has shown proficiency in operating each type of Metro vehicle, the employee cadets, (drives in service) with an experienced bus operator. The experienced bus operator is asked to complete an evaluation of the cadetting employee. The evaluation is then reviewed by the Training Supervisor to determine if additional training is required or if the progress of the cadet is acceptable.

Current employees are periodically asked to participate in refresher training which includes classroom and behind-the wheel training.

Any employee who has a CDL license, and has been off of work for 31 days or more, must undergo a minimum of 3 hours of retraining with the trainer before they will be allowed to return to work in the same capacity as before they went on extended leave. All retraining must be documented by the training supervisor, signed off on by the General Manager, and placed into the employee's file.

Any employee who has a CDL license, and has had a preventable accident, must undergo retraining, within 5 days of the determination of the accident being preventable, with the trainer. The type and length of retraining shall be determined based on the type of preventable accident. All retraining must be documented by the training supervisor, signed off on by the General Manager, and placed into the employee's file.

Maintenance personnel are provided with on-the-job training which is delivered by the manufactures or vendors of the products/equipment purchased by Metro.

Occupational Safety Training is provided to all employees. The training curriculum is provided from in-house training staff, outside vendors, representatives from the Workman's Compensation Insurance Carrier, or Transit Mutual Insurance's Safety Director.

Mandatory safety meetings for all employees are held semi-annually and topics covered vary based on need. The meetings are a minimum of two hours in length and employees are compensated at their hourly wage rate for their attendance. Maintenance staff participate in daily safety meetings with the Maintenance Director to discuss daily activities. Transportation Supervisors also conduct a weekly safety talk with reporting operators in the report area. Daily safety messages are announced over the radio system by the Transportation Supervisor on duty.

Weekly safety tips are generated from Transit Mutual Insurance and posted for all employees to view on the bulletin boards. Safety posters covering a wide variety of

topics are produced and displayed for employee viewing. If it is determined a message needs to get out on any specific area or item, staff will create safety posters and tips to get the message out.

On-line training, when available, are utilized by transit employees as another training tool.

Individual and group sponsored training is utilized when it is available.

All employees are provided with documents outlining policies and procedures in place for Metro. These include the Personnel Policy Manual which can be found in Appendix M. The policy manual includes al Personnel Policies, a Bus Drivers' Guide, a Transportation Safety Policy, a Performance Code, the Drug and Alcohol Policy and a Policy Acknowledgement.

Safety Management training topics may include:

A. Initial Safety Training for All Staff

1. Basic principles of safety management including the integrated nature of SMS, risk management, safety culture, etc.
2. Corporate safety philosophy, safety goals and objectives, safety policy, and safety standards
3. Importance of complying with the safety policy and SMS procedures, and the approach to disciplinary actions for different safety issues
4. Organizational structure, roles and responsibilities of staff in relation to safety
5. Metro's safety record, including areas of systemic weakness
6. Requirement for ongoing internal assessment of organization safety performance (e.g. employee surveys, safety audits, and assessments)
7. Reporting accidents, incidents, and perceived hazards
8. Lines of communication for safety managers
9. Feedback and communication methods for the dissemination of safety information
10. Safety promotion and information dissemination

B. Safety Training for Operations Personnel

1. Unique hazards facing operational personnel
2. Seasonal safety hazards and procedures (e.g. winter operations)
3. Procedures for hazard reporting
4. Procedures for reporting safety events (accidents and incidents)

5. Emergency procedures

C. Safety Training for Management

1. Principles of the SMS
2. Management responsibilities and accountabilities for safety
3. Legal issues (e.g. liability)

D. Training for the Safety Officer

1. Familiarization with different transit modes, types of operation, routes, etc.
2. Understanding the role of human performance in safety event causation and prevention
3. Operation of the SMS
4. Investigating safety events
5. Crisis management and emergency response planning
6. Safety promotion
7. Communication skills
8. Performing safety audits and assessments
9. Monitoring safety performance
10. National Transit Database (NTD) safety event reporting requirements

APPENDICES

Appendix A – Staff Safety Roles and Responsibilities
Appendix B – Safety Assessment and System Review
Appendix C – Facility Safety and Security Assessment
Appendix D – Risk Assessment Matrix
Appendix E – Hazard Identification and Risk Assessment Log
Appendix F – Prioritized Safety Risk Log
Appendix G – Safety Performance Matrix
Appendix H – Safety Performance Outline
Appendix I – Non-Punitive Reporting Policy
Appendix J – Accident Procedures WMT-PTMW
Appendix K – Master ACCREV 2015 to Present
Appendix L - TMI - WAK Monthly Loss Runs
Appendix M – PTMW Handbook Non-Represented (includes Represented) Employees
Appendix N – Annual Safety Performance Targets
Appendix O – BiPartisan Infrastructure Law – Minimization of Exposure to Infectious Diseases