

Greater Attleboro Taunton Regional Transit Authority

Public Transportation Agency Safety Plan

September, 2020

Introduction

The following Public Transportation Agency Safety Plan (PTASP) details the safety processes and procedures for the Greater Attleboro Taunton Regional Transit Authority (GATRA). This plan utilizes existing agency safety practices and best practices to be implemented to meet the new regulation set in 49 CFR Part 673 of the federal guidelines.

The PTASP includes formal documentation to guide the agency in proactive safety management policy, safety risk management, safety assurance, and safety promotion. The goal is to provide management and labor a comprehensive, collaborative approach to managing safety. The plan includes the process and schedule for an annual review of the plan to review the safety performance measures and update processes that may be needed to improve the organization's safety practices.

Agency Background

Since its inception in 1976, GATRA has provided quality transportation services that are geared to improve the quality of life and assist customers in becoming more transportation independent. Over the years, GATRA's service area has expanded to include 28 diverse communities stretching from Southern Norfolk County and Northern Bristol County, all the way to Plymouth County and the South Shore.

Today, GATRA oversees operations of fixed route bus services in the cities of Attleboro and Taunton, and the towns of Duxbury, Foxborough, Franklin, Kingston, Mansfield, Marshfield, Middleborough, Norfolk, North Attleboro, Norton, Plainville, Plymouth, Raynham, Seekonk, Wareham, and Wrentham. In 2015, GATRA launched the SLOOP, bringing fixed route service to the town of Scituate.

In addition to fixed route service, GATRA provides demand response (Dial-A-Ride) services for people with disabilities and seniors in all 28-member communities. GATRA also plays a vital role in the provision of Commuter Rail service to Boston by providing shuttle services to MBTA stations in the towns of Bellingham, Franklin, Norton, Mansfield, Medway, Middleborough, and Pembroke.

GATRA was formed under Chapter 161B of the Massachusetts General Laws, which require regional transit authorities to contract for the operation of services. In compliance with this GATRA contracts with three private operators and fifteen Council on Aging's to provide transportation the transportation it oversees.

1. Transit Agency Information

Transit Agency Name	Greater Attleboro Taunton Regional Transit Authority (GATRA)		
Transit Agency Address	10 Oak Street Taunton, MA 02780		
Name and Title of Accountable Executive	Mark Souza, Administrator		
Name of Chief Safety Officer or SMS Executive	Stacy Forte, Director of Administration and Compliance		
Mode(s) of Service Covered by This Plan	Fixed Route Demand Response	FTA Funding Types	5307, 5339, 5337
Mode(s) of Service Provided by the Transit Agency (Directly Operated or Contracted Service)	Fixed Route Demand Response Council on Aging Service (Contracted Services)		
Does the agency provide transit services on behalf of another transit agency or entity	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Description of Arrangements GATRA is a broker for HST. PTM of Attleboro, Inc., GATRA's management company, does provide HST work.
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided			

2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Greater Attleboro Taunton Regional Transit Authority (GATRA)	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
Approval by the Board of Directors or an Equivalent Authority	Name of the Individual/Entity That Approved This Plan	Date of Approval
	Relevant Documentation (Title and Location)	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification
	Greater Attleboro Taunton Regional Transit Authority (GATRA)	
	Relevant Documentation (Title and Location)	

Version Number and Updates

Record the complete history of successive versions of this plan.

Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	All	New Document	9/09/20

Annual Review and Update of the Agency Safety Plan

Describe the process and timeline for conducting an annual review and update of the ASP.

This plan shall be reviewed on an annual basis to account for any updates to GATRA's safety policies or procedures. The Chief Safety Officer shall direct the update of the ASP, in consultation with the General Manager of each operation. Each February the Chief Safety Officer will initiate a review of the ASP, in consultation with the General Manager of each operation. By May, an updated draft of the ASP shall be provided to the Accountable Executive for final review. The Board of Directors will vote to approve any changes by July 20th. All changes will ultimately be approved by the Accountable Executive. All changes will ultimately be approved by the Accountable Executive.

Safety Performance Targets

Safety Performance Targets

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

The targets below are based on the review of the previous five years of GATRA's safety performance data.

Mode of Transit Service	Fatalities (Total)	Fatalities (Rate)	Injuries (Total)	Injuries (Rate)	Safety Events (Total)	Safety Events (Rate)	System Reliability (Mean Distance Between Failure)
Fixed Route	0	0	3	1.8	3	1.8	45,000
Demand Response	0	0	2	1.3	2	1.3	55,000

*Rates are per 1,000,000 vehicle revenue miles

Safety Performance Target Coordination

Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.

The Accountable Executive shares our ASP, including safety performance targets, with the Metropolitan Planning Organization (MPO) in our service area each year after its formal adoption by the Advisory Board. GATRA's Accountable Executive also provides a copy of our formally adopted plan to the Massachusetts Department of Transportation (MassDOT). GATRA staff are available to coordinate with MassDOT and the MPO in the selection of MassDOT and MPO safety performance targets upon request.

Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	MassDOT	05/21/20
Targets Transmitted to the MPOs	MPO Name	Date Targets Transmitted
	Southeast Regional Planning and Economic Development District	

3. Safety Management Policy

Safety Management Policy Statement

Use the written statement of safety management policy, including safety objectives.

While GATRA's contractors all have unique and specific safety needs, policies, and practices, GATRA is committed to leading the way in creating and maintaining a superior safety culture. Through these efforts, GATRA strives to offer its passengers safe, reliable, and efficient transportation.

GATRA's major safety objectives include:

- Minimizing safety accidents, incidents, and occurrences
- Ensuring a safety culture is present throughout the organization, with all employees empowered to identify and report safety concerns to appropriate managers
- Prioritizing a safe experience for all our passengers with minimal disruptions
- Creating and maintaining a safe working environment for all GATRA employees and contractors

Safety Management Policy Communication

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

Employees and management are required to attend and actively participate in quarterly safety meetings. Ongoing safety meetings will be used to reinforce the safety policies of each individual contractor as well as enforce GATRA's safety principles included in their plan. Copies of the GATRA Agency Safety Plan, including the SMS will be made available to all front-line employees.

The Chief Safety Officer visits each contractor on at least an annual basis to specifically discuss any new safety policies or updates and educate employees on new federal and state requirements and guidelines, including the SMS principles contained within this document.

Authorities, Accountabilities, and Responsibilities

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

Accountable Executives

As GATRA's Administrator, the Accountable Executive has the authority to control and direct 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.

Safety responsibilities of the Accountable Executive include:

	<ul style="list-style-type: none"> • Controlling and directing human and capital resources needed to develop and maintain the ASP and SMS • Designating an adequately trained Chief Safety Officer who is a direct report. • Ensuring that SMS is effectively implemented
<p>Chief Safety Officer or SMS Executive</p>	<p>As Compliance Manager, the Chief Safety Officer has direct responsibility for working with the management of each contracted operation to implement the Safety Management System and has the authority to make modifications to operating procedures to optimize system safety. The CSO reports directly to the Accountable Executive and communicates critical safety-related information to the AE on at least a weekly basis.</p> <p>Safety responsibilities of the GATRA Chief Safety Officer, Stacey Forte, who holds the position of – Director of Administration and Compliance include:</p> <ul style="list-style-type: none"> • Developing and managing ASP and SMS policies and procedures, and keeping all policies and procedures up-to-date • Ensuring and overseeing implementation and operation of the Safety Management System (SMS) • Overseeing the Employee Safety Reporting Program and ensuring that a robust line of safety-related communication is consistently maintained • Managing GATRA’s training program and ensuring that all employees are up to date on required trainings
<p>Agency Leadership and Executive Management</p>	<p>Other senior and executive staff, both at GATRA and its contracted operators, with key safety related responsibilities include:</p> <ul style="list-style-type: none"> • Facilities Manager • Maintenance Supervisor • General Managers at PTM, Kiessling, and Bill’s Taxi • Directors of all constituent COA operations <p>The responsibilities of this group include:</p> <ul style="list-style-type: none"> • Oversight of day-to-day operations and procedures related to the Safety

	<p>Management System within each of their departments</p> <ul style="list-style-type: none"> • Modification of policies at each operation to be consistent with SMS implementation, as necessary • Proper reporting of safety hazards and mitigations to the Chief Safety Officer • Day-to-day oversight of the employee safety reporting program, as necessary (particularly for Safety Manager and Assistant General Manager) and ensuring a consistent line of communication between front line employees and management concerning safety
<p>Key Staff</p>	<p>Other key safety-related staff at GATRA include: operators, maintenance staff, trainers, supervisors, and dispatchers</p> <p>While each of these categories of employees have diverse and specific safety responsibilities related to their day-to-day duties and job performance, the overarching responsibilities of key safety staff include:</p> <ul style="list-style-type: none"> • Reporting any identified safety concerns to management in a timely fashion • Following and abiding by all GATRA and contractor safety policies and acting in accordance with the principles of the SMS
<p>Employee Safety Reporting Program</p> <p><i>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).</i></p>	
<p>Employees will immediately report any unsafe conditions or incidents to their Supervisor/Manager and are encouraged to make suggestions for improved safety performance and conditions. All employee reports of unsafe conditions or hazards that are received by the management of a contractor are communicated to GATRA's Chief Safety Officer.</p> <p>If for any reason, an employee does not feel comfortable reporting unsafe conditions through the chain-of-command to the supervisor/manager of their contracted operation, they can also report GATRA management by sending a message to the Chief Safety Officer through a dedicated reporting address on the GATRA website that allows employees to make reports anonymously.</p> <p>Employees will be notified of actions taken in response to employee reports either through bulletins posted in common areas at GATRA's larger contractors, or through discussions at regular safety meetings between managers and drivers.</p>	

Employees that report safety concerns in good faith are protected from any retaliatory measures. However, GATRA may take disciplinary actions if the report contains any of the following employee activities:

- Willful participation in illegal activity, such as assault or theft;
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk; or,
- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances.

4. 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 associate with identified safety hazards.*
- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment.*

Due to the diverse nature of GATRA's operations and the differing needs and capabilities of the contractors and properties that make up GATRA's service, the authority has adopted a decentralized approach to safety risk management. General Managers or owners of each operation are responsible, in consultation with their staff, for identifying and assessing risks with the support of the Chief Safety Officer and Accountable Executive as necessary.

Safety Hazard Identification

PTM contracts with a company to review hazards on its property on a periodic basis, which provides an important source of hazard identification data for GATRA's largest constituent operation.

Across all operations, the following sources are used to identify and document safety hazards at GATRA:

- Accident and incident reports
- Driver records
- Customer complaints and service requests
- Review of performance data, including near misses and instances of vehicle damage
- Tire cut reports
- Vehicle camera footage after accidents or incidents
- Employee reporting
- Maintenance reports
- Observations from supervisors
- Hazards described by insurance company reports
- External information, including reports from FTA and other oversight authorities, which provide information based on Federal, State or local findings, research, considerations, or assessments.

All the sources listed above are frequently monitored by the Chief Safety Officer. All accident and incident data are documented in an Access database managed by the CSO. Other hazard information is also collected and maintained by the Chief Safety Officer.

Safety Risk Assessment

Following the identification of safety hazards, assessment of risk for potential consequences of each hazard is conducted on an ongoing basis by the Chief Safety Officer in consultation with the General Manager of the relevant operation, and any other relevant executive staff. The likelihood and severity of the potential consequences of the hazard are assessed based on the type of hazard presented and the potential consequences the hazard could pose if not properly mitigated. The following matrices are used to guide discussions of risk assessment.

A. Categorize Level of Severity

1. Catastrophic - may cause death
2. Critical - may cause severe illness, severe injury or major system loss
3. Marginal - may cause minor injury
4. Negligible - will not result in injury, illness or system damage

B. Categorize the Likelihood of Occurrence

1. Highly likely - frequent reoccurrence
2. Likely - expected occurrence
3. Unlikely - occurrence not expected

Once the risk of a safety hazard is assessed based on the suggested categorizations above, mitigation strategies that align with the severity and likelihood of the safety problem are determined. If a mitigation is already in place to address the potential consequence of a hazard, the effectiveness of this mitigation is factored into the risk assessment. This process will generally take place under the supervision of the Chief Safety Officer and the General Managers of each operation.

Safety Risk Mitigation

Appropriate mitigation strategies are determined by the Chief Safety Officer in conjunction with the relevant operational general managers based on the level of severity and the likelihood of occurrence determined during the Safety Risk Assessment process. The Chief Safety Officer is responsible for following up with each operation to ensure that mitigations are being implemented. For operator-related concerns, the CSO is committed to making sure that retraining is provided to operators when appropriate.

5. Safety Assurance

Safety Performance Monitoring and Measurement

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

Monitoring and oversight to ensure compliance with internal procedures for operations and maintenance is the responsibility of the Chief Safety Officer. The Chief Safety Officer will periodically audit training protocols, pre-trip inspections, and post-trip operations and maintenance safety procedures at each contracted operator.

Other activities to monitor compliance with operations and maintenance procedures include:

- Insurance audit at PTM properties
- Employee safety reports
- Customer complaints and service requests
- Database of training requirements and progress for all GATRA drivers
- Accident and incident reports
- Drug and alcohol testing
- Vehicle maintenance and breakdown reports

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

Monitoring safety risk mitigations is an important component of GATRA's overall safety strategy and helps ensure that safety hazards are being addressed in an appropriate and timely fashion. The Chief Safety Officer is responsible for following up with each contracted operation to ensure that mitigations are being implemented. Monitoring methods for identifying ineffective mitigation actions include:

- Reviewing results from accident, incident, and occurrence investigations;
- Monitoring employee safety reporting;
- Reviewing results of internal safety audits and inspections;
- Analyzing operational and safety data to identify emerging safety concerns; and,
- Tracking performance metrics.

The Chief Safety Officer will use the methods listed above to monitor ongoing safety risk mitigation at each operation on at least a monthly basis.

Describe activities to conduct investigations of safety events, including the identification of causal factors.

All accidents, incidents, and occurrences that occur involving GATRA revenue vehicles or on GATRA properties are thoroughly investigated. Prompt and accurate investigations of all accidents and injuries will be conducted to determine the root cause and to prevent reoccurrences at all contracted operations. Appropriate management personnel will review the accident details to determine preventability as soon as reasonably possible. Both preventable and non-preventable accidents are tracked within GATRA's Accident/Incident database.

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

The Chief Safety Officer is responsible for management and oversight of all employee reporting at GATRA, and particularly for monitoring of any written employee safety reports. Managers at GATRA operations have the responsibility to report to the Chief Safety Officer when safety concerns are identified so any hazards can be properly documented.

Employees will be notified of actions taken in response to employee reports either through bulletins posted in common areas at GATRA's larger contractors, or through discussions at regular safety meetings between managers and drivers.

6. Safety Promotion

Competencies and Training

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

GATRA employs a comprehensive training program for all safety-sensitive staff and contractors. The Chief Safety Officer reviews the safety training program on at least an annual basis with the General Manager of each operation to ensure that relevant staff are up-to-date on all trainings and that all contractor staff are receiving the training and guidance necessary to excel in their duties. This review is part of the annual ASP update process.

Refresher trainings for staff are provided on an ongoing basis, with the frequency of re-training depending on the specific training module. The frequency of re-training is noted alongside each training described below.

In addition to the required trainings below, all safety-related staff, including executive staff, are briefed on the components of the Safety Management System through completion of the Transit Safety Institute's SMS Awareness Course.

While specific trainings offered differ between GATRA's constituent operations, there are certain trainings that all operators are required to undergo. Required trainings include:

- Defensive Driving (every 2 years)
- Accessible Lift Use/Passenger Securement (every 2 years)
- Disability Awareness (every 3 years)
- Drug & Alcohol Awareness (Upon Hire)
- Bloodborne Pathogens (Upon Hire)
- CPR/First Aid (every 2 years)

A more detailed description of PTM's training modules, including its policies for retraining and refresher training is included in Appendix A.1 of this document, in sections B and C.

All maintenance staff are required to undergo Occupational Safety and Health Administration (OSHA) training, in addition to facilities and equipment training. Additionally, supervisors are responsible for drug and alcohol suspicion training.

Safety Communication

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

GATRA is committed to thoroughly communicating its safety policies, procedures, and performance, as well as ensuring that contractors are consistently conveying information related to hazards and safety risks relevant to employees' roles and responsibilities to its staff.

Employees and management are required to attend and actively participate in quarterly safety meetings. Ongoing safety meetings will be used to reinforce the safety policies of each individual contractor as well as enforce GATRA's safety principles included in this

plan. Copies of the GATRA Agency Safety Plan, including the SMS will be made available to all front-line employees.

The Chief Safety Officer visits each contractor on at least an annual basis to specifically discuss and new safety policies or updates and educate employees on new federal and state requirements and guidelines, including the SMS principles contained within this document.

Employees will be notified of actions taken in response to reports from the Employee Safety Reporting Program either through bulletins posted in common areas at GATRA's larger contractors, or through discussions at regular safety meetings between managers and drivers.

Additional Information

Supporting Documentation

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

Appendix A.1 GATRA PTM Policies and Procedures

Definitions of Special Terms Used in the ASP

Term	Definition
Accident	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.
Accountable Executive	Single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; 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.
Equivalent Authority	Entity that carries out duties similar to that of a Board of Directors for a recipient or sub recipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or sub recipient's Public Transportation Agency Safety Plan.

Event	Any Accident, Incident, or Occurrence.
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.
Incident	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.
Investigation	Process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
National Public Transportation Safety Plan	Plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53
Occurrence	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.
Operator of public transportation system	Provider of public transportation as defined under 49 U.S.C. 5302.
Performance measure	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	Quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
Public Transportation Agency Safety Plan (or Agency Safety Plan)	Documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
Risk	Composite of predicted severity and likelihood of the potential effect of a hazard.
Risk Mitigation	Method or methods to eliminate or reduce the effects of hazards.
Safety Assurance	Processes within a transit agency's Safety Management System 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 Management Policy	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	Formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

Safety Performance Target	Performance target related to safety management activities.
Safety Promotion	Combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
Safety risk assessment	Formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety risk management	Process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Serious injury	Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when 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.
Transit Agency	Operator of a public transportation system
Transit Asset Management Plan	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.

List of Acronyms Used in the ASP

Acronym	Word or Phrase
ADA	American's with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as a PTASP in Part 673)
CFR	Code of Federal Regulations
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
GATRA	Greater Attleboro Taunton Regional Transit Authority
MPO	Metropolitan Planning Organization
ODP	Office of Domestic Preparedness encourages State's territories, and Urban Area to use funds to enhance the capabilities of State and local emergency preparedness and response personnel through development of a State homeland security training program
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
SRM	Safety Risk Management
U.S.C.	United States Code

