

LETS Agency Safety Plan

Version 1, Issued 11/12/2020

Transit Agency Information:

Transit Agency Name	Livingston Essential Transportation (LETS)
Transit Agency Address	3950 W. Grand River Ave, Howell, MI 48843
Name and Title of Accountable Executive	Greg Kellogg, Director of Transportation
Name of Chief Safety Officer or SMS Executive	Tiffany Buskirk, Trainer and Chief Safety Officer
Modes of Service Covered by this Plan	Non-Fixed Route Bus
List ALL FTA Funding Types	5307, 5310, 5311, 5339, CMAQ
Modes of Service Provided by the Transit Agency (Directly Operated or Contracted Service)	LETS directly provides Demand Response services and uses LETS employees to supply the necessary labor to operate revenue vehicles. LETS also contracts for shuttle service to Detroit Metro Airport which uses contractor-provided vehicles and labor.
Does the agency provide transit services on behalf of another transit agency or entity?	No
Description of Arrangement(s)	
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service is Provided	

Plan Development, Approval, and Updates:

Name of Entity That Drafted This Plan	Tiffany Buskirk, Trainer and Chief Safety Officer, LETS	
Signatures by the Accountable Executive	Signatures of Accountable Executive	Date of Signature
	Greg Kellogg, Director of Transportation	
Approval by the County Commissioners	Name of the Individual/Entity that Approved this Plan	Date of Approval
	County Commission Resolution #	
	Relevant Documentation (Title and Location)	
	A copy of the County Commission Resolution # , approving the Agency Safety Plan (ASP), is maintained on file by the Chief Safety Officer, LETS	
Certification of Compliance	Name of the Individual/Entity that Certified this Plan	Date of Certification

	Relevant Documentation (Title and Location)

Version Number and Updates			
<i>Record the complete history of successive versions of this plan.</i>			
Version Number	Sections/Pages Affected	Reason for Change	Date Issued
1		New Document	12/3/2020

Annual Review and Update of the Agency Safety Plan
<i>Describe the process and timeline for conducting an annual review and update of the ASP.</i>
This plan will be reviewed and updated by the Chief Safety Officer, the Operations Manager, and Deputy Director of Transportation by July 1 of each year. The Accountable Executive will review and approve any changes, signing the new ASP, then forward to the county commission for review and approval. LETS will ensure this Agency 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.

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>							
Targets below are based on review of the previous two years of LETS's safety performance data.							
Mode of Transit Service	Fatalities (Total)	Fatalities (per 100 thousand VRM)	Injuries (total)	Injuries (per 100 thousand VRM)	Safety Events (Total)	Safety Events (per 100 thousand VRM)	System Reliability (VRM/failure)
Demand Response	0	0	0	0	0	0	8,500

Safety Performance Target Coordination		
<i>Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.</i>		
LETS's 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 County Commission. LETS's Accountable Executive also provides a copy of our formally adopted plan to the Michigan Department of Transportation. LETS personnel are available to coordinate with MDOT and SEMCOG safety performance targets upon request.		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Michigan Department of Transportation (MDOT)	
	Metropolitan Planning Organization Name	Date Targets Transmitted

Targets Transmitted to the Metropolitan Planning Organization	Southeast Michigan Council of Governments (SEMCOG)	
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Safety Management Policy:

Safety Management Policy Statement <i>Include the written statement of safety management policy, incorporating safety objectives.</i>
<p>Safety is a core value at LETS, and managing safety is a core business function. We will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. LETS is committed to the following safety objectives:</p> <ul style="list-style-type: none"> • Communicating the purpose and benefits of the Safety Management System (SMS) to all staff, managers, supervisors, and employees. • Providing a culture of open reporting of all safety concerns, ensuring that no action will be taken against any employee who discloses a safety concern through LETS's Employee Safety Reporting Program (ESRP), unless such disclosure indicates, beyond a reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures. • Providing appropriate management involvement and the necessary resources to establish an effective ESRP 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 ESRP. (After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.) • 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. <p>Greg Kellogg, Director of Transportation and Accountable Executive</p>
Safety Management Policy Communication <i>Describe how the safety management policy is communicated throughout the agency's organization. Include dates where applicable.</i>
<p>The Chief Safety Officer, who leads LETS's SMS activities, will introduce our staff to SMS principles in January 2021, at an All-Staff Meeting. LETS's safety Management Policy Statement will also be distributed to each employee in the form of a handout during this All-Staff meeting. LETS also will post copies of the Safety Management Policy Statement on bulletin boards at the office and in the break room. LETS has incorporated review and distribution of the Safety Management Policy Statement into new-hire training and all-staff annual refresher training.</p>

Authorities, Accountabilities, and Responsibilities <i>Describe the authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency's SMS.</i>
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Accountable Executive	<p>The Director of Transportation serves as LETS's Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Controls and directs human and capital resources needed to develop and maintain the ASP and SMS. • Designates an adequately trained Chief Safety Officer who is a direct report. • Ensures that LETS's SMS is effectively implemented. • Ensures action is taken to address substandard performance in LETS's SMS. • Assumes ultimate responsibility for carrying out LETS's ASP and SMS. • Maintains responsibility for carrying out the agency's Transit Asset Management Plan.
Chief Safety Officer or SMS Executive	<p>The Accountable Executive designates the Trainer as LETS's Chief Safety Officer. The Chief Safety Officer has the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Develops LETS's ASP and SMS policies and procedures. • Ensures and oversees day-to-day implementation and operations of LETS's SMS. • Manages LETS's ESRP. • Chairs the LETS Safety Committee: coordinates the activities of the committee; establishes and maintains LETS's safety Risk Register and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents, and accidents; maintains and distributes minutes of committee meetings. • Advises the Accountable Executive on SMS progress and status. • Identifies substandard performance in LETS's SMS and develops action plans for approval by the Accountable Executive. • Ensures LETS policies are consistent with LETS's safety objectives. • Provides Safety Risk Management (SRM) expertise and support for other LETS personnel who conduct and oversee Safety Assurance activities.
Agency Leadership and Executive Management	<p>Agency Leadership and Executive Management also have authorities and responsibilities for day-to-day SMS implementation and operation of LETS's SMS under this plan. LETS Agency Leadership and Executive Management include:</p> <ul style="list-style-type: none"> • Deputy Director • Operations Manager • Chief Safety Officer • Lead Dispatcher • Maintenance Coordinator <p>LETS Leadership and Accountable Executive personnel have the following authorities, accountabilities, and responsibilities.</p> <ul style="list-style-type: none"> • Participate as members of LETS's Safety Committee as permanent members.

	<ul style="list-style-type: none"> • Complete training on SMS and LETS ASP elements. • Oversee day-to-day operations of the SMS in their departments. • Modify policies in their departments consistent with implementation of the SMS, as necessary. • Provide subject matter expertise to support implementation of the SMS as requested by the Accountable Executive or the Chief Safety Officer, including SRM activities, investigation of safety events, development of safety risk mitigations, and monitoring of mitigation effectiveness.
Key Staff and Activities	<p>LETS uses the Safety Committee, as well as bi-monthly Drivers' Meetings and quarterly All-Staff Meetings, to support its SMS and safety programs:</p> <ul style="list-style-type: none"> • Safety Committee: Any safety hazards reported will be jointly evaluated by the Safety Committee and the Chief Safety Officer during the monthly meeting. The Safety Committee members include the Chief Safety Officer, Operations Manager, Lead Dispatcher (or representative), Maintenance Coordinator (or representative), and two Drivers who will meet bi-monthly to review issues and make recommendations to improve safety. • Drivers' Meetings: A permanent agenda item in all bi-monthly drivers' meetings is dedicated to safety. Safety issues are discussed and documented. • All-Staff Meetings: Hazard reports and mitigations will be shared, safety topics will be brought up for open discussion, further feedback solicited, and hazard self-reporting further encouraged. Information discussed in these meetings will be documented.
Employee Safety Reporting Program <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>LETS's ESRP encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. There are many ways employees can report safety conditions:</p> <ul style="list-style-type: none"> • Report conditions directly to the dispatcher, who will add them to the daily Operations Log. • Report conditions anonymously via a locked comment box in the break room. • Report conditions directly to any upper management. <p>Examples of information typically reported include:</p> <ul style="list-style-type: none"> • Safety concerns in the operating environment (for example: county or city road conditions or the condition of facilities or vehicles) • Policies and procedures are not working as intended (for example, insufficient time to complete pre-trip inspections) • Events that senior management might not otherwise know about (for example: near misses) • Information about why a safety event occurred (for example: radio communication challenges) <p>On a daily basis, the Chief Safety Officer reviews the dispatch daily Operations log, checks the comment box, and documents identified safety condition in the Safety Risk Register. LETS's Chief Safety Officer, supported by the Safety Committee, as necessary, will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and</p>	

resolved through LETS's SRM process and that reported deficiencies and non-compliance with rules or procedures are managed through LETS's Safety Assurance process.

LETS's Chief Safety Officer discusses actions taken to address reported safety conditions during the quarterly All-Staff Meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the Chief Safety Officer or designee follows up directly with the employee when LETS determines whether or not to take action and after any mitigations are implemented.

LETS encourages participation in the ESRP by protecting employees that report safety conditions in good faith. However, LETS may take disciplinary action if the report involves any of the following:

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

Safety Risk Management:

Safety Risk Management

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.*

Safety Risk Management Process:

LETS uses the SRM process as a primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. It is a process whereby hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to LETS's leadership. LETS's SRM process allows us to carefully examine what could cause harm and determine whether we have taken sufficient precautions to minimize the harm, or if further mitigations are necessary.

LETS's Chief Safety Officer leads LETS's SRM process, working with LETS's Safety Committee to identify hazards and consequences, and mitigate safety risk. The results of LETS's SRM process are documented in our Safety Risk Register and referenced materials.

LETS's SRM process applies to all elements of our system including our operations and maintenance; facilities and vehicles; and personnel recruitment, training, and supervision.

In carrying out the SRM process, LETS uses the following terms:

- Event – Any accident, incident, or occurrence
- Hazard – Any real or potential condition that can cause injury, illness, or death; damage or loss of the facilities, equipment, rolling stock, or infrastructure belonging to LETS; or damage to the environment.

- Risk – Composite of predicted severity and likelihood of the potential effect of a hazard.
- Risk Mitigation – Method(s) to eliminate or reduce the effects of hazards.
- Consequence – An effect of a hazard involving injury, illness, death, or damage to LETS property or the environment.

Safety Hazard Identification:

The safety hazard identification process offers LETS the ability to identify hazards and potential consequences in the operation and maintenance of our system. Hazards can be identified through a variety of sources, including:

- ESRP
- Review of vehicle camera footage
- Review of monthly performance data and safety performance targets
- Observations from supervisors
- Maintenance reports
- Comments from customers, passengers, and third parties, including LETS transit insurance pool and vendors
- Safety committee, Drivers', and All-Staff Meetings
- Results of audits and inspections of vehicles and facilities
- Results of training assessments
- Investigations into safety events, incidents, and occurrences
- Federal Transit Administration (FTA) and other oversight authorities (mandatory information source)

When a safety concern is observed by LETS management, whatever the source, it is reported to LETS Chief Safety Officer. Procedures for reporting hazards to LETS Chief Safety Officer are reviewed during All-Staff Meetings and in the Safety Committee. LETS Chief Safety Officer also receives employee reports from the ESRP, customer comments related to safety, and the dispatch daily Operations Log. LETS Chief Safety Officer reviews these sources for hazards and documents them in LETS's Safety Risk Register.

LETS's Chief Safety Officer also may enter hazards into the Safety Risk Register based on their review of LETS's operations and maintenance, the results of audits and observations, and information received from FTA and other oversight authorities, as well as the National Transportation Safety Board.

LETS's Chief Safety Officer may conduct further analyses of hazards and consequences entered into the Safety Risk Register to collect information and identify additional consequences and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, LETS's Chief Safety Officer may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc)

- Contact other departments that may have association with or technical knowledge relevant to the reported hazard
- Review any past reported hazard of a similar nature
- Evaluate tasks and/or processes associated with the reported hazard.

LETs's Chief Safety Officer will then prepare an agenda to discuss identified hazards and consequences with the Safety Committee during bimonthly meetings. This agenda may include additional background on the hazards and consequences, such as the results of trend analyses, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities.

Any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately be brought to the attention of the Accountable Executive and addressed through the SRM process (with or without the full Safety Committee) for safety risk assessment and mitigation. This means that the Chief Safety Officer believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of Environmental Protection Agency or Michigan environmental protection standards. Otherwise, the Safety Committee will prioritize hazards for further SRM activity.

Safety Risk Assessment:

LETs assesses safety risk associated with identified safety hazards using its safety risk assessment process, this includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk.

The Chief Safety Officer and Safety Committee assess prioritized hazards using LETs's Safety Risk Matrix. This matrix expresses assessed risk as a combination of one severity category and one likelihood level, also referred to as a hazard rating. For example, a risk may be assessed as "1A" or the combination of a Catastrophic (1) severity category and a Frequent (A) probability level.

This matrix also categorizes combined risks into levels, High, Medium, or Low, based on the likelihood of occurrence and severity of the outcome. For purposes of accepting risk:

- "High" hazard ratings will be considered unacceptable and require action from LETs to mitigate the safety risk
- "Medium" hazard ratings will be considered undesirable and require LETs's Safety Committee to make a decision regarding their acceptability
- "Low" hazard ratings may be accepted by the Chief Safety Officer without additional review

Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk.

The Chief Safety Officer schedules safety risk assessment activities on the Safety Committee agenda and prepares a Safety Risk Assessment Package. This package is distributed at least one week in advance of the Safety Committee meeting. During the meeting, the Chief Safety Officer reviews the hazards and its consequence(s) and reviews available information distributed in the safety Risk Assessment Package on severity and likelihood. The Chief Safety Officer may request support from members of the Safety Committee in obtaining additional information to support the safety risk assessment.

Once sufficient information has been obtained, the Chief Safety Officer will facilitate completion of relevant sections of the Safety Risk Register, using the LETS Safety Risk Assessment Matrix, with the Safety Committee. The Chief Safety Officer will document the Safety Committee's safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Safety Risk Register. The Chief Safety Officer will maintain on file Safety Committee agendas, Safety Risk Assessment Packages, additional information collection, and completed Safety Risk Register sections for a period of three years from the date of generation.

Safety Risk Matrix: (need to confirm monetary loss limits)

Likelihood of Occurrence of the Consequence		
<i>Qualitative Definition</i>	<i>Meaning</i>	<i>Value</i>
Frequent	Likely to Occur Frequently ($>10^{-1}$)	A
Probable	Likely to Occur Several Times ($<10^{-1}$ but $>10^{-3}$)	B
Occasional	Likely to Occur Sometime ($<10^{-3}$ but $>10^{-6}$)	C
Remote	Very Unlikely to Occur ($<10^{-6}$ but $>10^{-8}$)	D
Improbable	Almost inconceivable that the event will occur ($<10^{-8}$)	E
Severity of the Consequence		
<i>Definition Category</i>	<i>Meaning</i>	<i>Value</i>
Catastrophic	Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact or monetary loss equal to or exceeding \$10M.	1
Critical	Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M.	2
Marginal	Could result in one or more of the following: injury or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100K but less than \$1M.	3
Negligible	Could result in one or more of the following: injury or occupational illness not resulting in a lost work day, minimal environmental impact, or monetary loss less than \$100K.	4

Risk Assessment Matrix				
Likelihood	Severity			
	1 (Catastrophic)	2 (Critical)	3 (Marginal)	4 (Negligible)
A (Frequent)	1A	2A	3A	4A
B (Probable)	1B	2B	3B	4B
C (Occasional)	1C	2C	3C	4C
D (Remote)	1D	2D	3D	4D
E (Improbable)	1E	2E	3E	4E

Risk Assessment Matrix Color Code	
<i>"Tolerability" based on identified severity and likelihood.</i>	
	Unacceptable under the existing circumstances.
	Acceptable based upon mitigations.
	Acceptable with senior management approval.

Safety Risk Mitigation:

LETs's Accountable Executive and Chief Safety Officer review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards based on recommendations from the Safety Committee. LETs can reduce safety risk by reducing the likelihood and/or severity of potential consequences of hazards.

Prioritization of safety risk mitigations is based on the result of safety risk assessments. LETs's Chief Safety Officer tracks and updates safety risk mitigation information in the Safety Risk Register and makes the Register available to the Safety Committee during monthly meeting and to LETs staff upon request.

In the Safety Risk Register, LETs Chief Safety Officer will also document any specific measures or activities, such as reviews, observations, or audits, that will be conducted to monitor the effectiveness of mitigations once implemented.

Safety Assurance:

Through our Safety Assurance process, LETs:

- Evaluates our compliance with operations and maintenance procedures to determine whether our existing rules and procedures are sufficient to control our safety risk
- Assesses the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended
- Investigates safety events to identify causal factors
- Analyzes information from safety reporting, including data about safety failures, effects, or conditions

Safety Performance Monitoring and Measurement

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

LETS has many processes in place to monitor its entire transit system for compliance with operations and maintenance procedures, including:

- Safety audits
- Informal inspections
- Regular review of onboard camera footage to assess drivers and specific incidents
- Safety surveys
- ESRP
- Investigation of safety occurrences
- Safety review prior to the launch or modification of any facet of service
- Daily data gathering and monitoring of data related to the delivery of service
- Regular vehicle inspections and preventative maintenance

Results from the above processes are compared against recent performance trends quarterly and annually by the Chief Safety Officer to determine where action needs to be taken. The Chief Safety Officer enters any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for reevaluation by the Safety Committee.

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

LETS monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The chief Safety Officer maintains a list of safety risk mitigations in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

The Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate director, manager, or supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports; conducting job performance observations; or other activities. The Chief Safety Officer will endeavor to make use of existing LETS processes and activities before assigning new information collection activities.

LETS's Chief Safety Officer and Safety Committee review the performance of individual safety risk mitigations during monthly Safety Committee meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the Safety Committee will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify this proposed course of action and oversee its execution.

LETS's Chief Safety Officer and Safety Committee also monitor LETS's operations on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by:

- 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

The Chief Safety Officer works with the Safety Committee and Accountable Executive to carry out and document all monitoring activities.

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

LETS maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event (see LETS Safety Event Investigation Procedures Manual for specific procedures for conducting safety investigations). These procedures also reflect all traffic safety reporting and investigation requirements established by Michigan's Department of Motor Vehicles.

The Chief Safety Officer maintains all documentation of LETS's investigation policies, processes, forms, checklists, activities, and results. As detailed in LETS's procedures, an investigation report is prepared and sent to the Accident/Incident Review Board for integration into their analysis of the event.

LETS's Accident/Incident Review Board consists of seven members that represent management, operations and maintenance. The Chief Safety Officer chairs the board. LETS's Accident/Incident Review Board determines whether:

- The accident was preventable or non-preventable
- Personnel require discipline or retraining
- The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event
- The accident appears to involve underlying organizational causal factors beyond just individual employee behavior.

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

The Chief Safety Officer and Safety Committee routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer and Safety Committee ensure that the concerns are investigated or analyzed through LETS's SRM process.

The Chief Safety Officer and Safety Committee also review internal and external reviews, including audits and assessments, with findings concerning LETS's safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.

Safety Promotion:

Competencies and Training

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

LETs's comprehensive safety training program applies to all LETs employees directly responsible for safety, including:

- Bus vehicle operators
- Dispatchers
- Maintenance
- Agency Leadership and Executive Management
- Chief Safety Officer
- Accountable Executive

LETs dedicates resources to conduct a comprehensive safety training program, as well as training on SMS roles and responsibilities. The scope of the safety training, including annual refresher training, is appropriate to each employee's individual safety-related job responsibilities and their role in the SMS.

Basic training requirements for LETs employees, including frequencies and refresher training, are documented in the LETs Training Matrix and the LETs Employee Handbook.

Operations safety-related skill training includes the following:

- New-hire- bus vehicle operator classroom and hands-on skill training
- Bus vehicle refresher training
- Bus vehicle retraining (recertification or return to work)
- Classroom and on the job training for dispatchers
- Classroom and on the job training for operations supervisors and managers
- Accident investigation training for operations supervisors

Vehicle maintenance safety-related skill training includes the following

- Ongoing vehicle maintenance technician skill training
- Ongoing skill training for vehicle maintenance supervisors
- Accident investigation training for the vehicle maintenance supervisors
- Ongoing hazardous material training for the vehicle maintenance technicians and supervisors
- Training provided by vendors

LETs Accountable Executive and Agency Leadership and Executive Management team must complete FTA's SMS Awareness online training and an executive session on safety management sponsored by LETs transit insurance pool.

Safety Communication

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

LETs's Chief Safety Officer and Operations Manager coordinate LETs's safety communication activities for the SMS. LETs's activities focus on the three categories of communication activity established in 49 CFR Part 673 (Part 673):

- **Communicating safety and safety performance information throughout the agency:** LETs communicates information on safety and safety performance in its quarterly newsletter and during quarterly All-Staff Meetings. LETs also has a permanent agenda item in all monthly Drivers' Meetings dedicated to safety. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact LETs's safety or safety performance, and updates regarding SMS implementation. LETs also requests information from drivers during these meetings, which is recorded in meeting minutes. Finally, LETs's Operation Manager and Trainer posts safety

bulletins and flyers on the bulletin board located in the hall near the locker room and on the TV (Pinto Mind) news feed in the break room and the app, advertising safety messages and promoting awareness of safety issues.

- **Communicating inform on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency.** As part of new-hire training, LETS distributes safety policies and procedures, including in the LETS Employee Handbook, to all employees LETS provides training on these policies and procedures and discusses them during safety talks between supervisors and bus operators and vehicle technicians. For newly emerging issues or safety events at the agency, LETS's Chief Safety Officer issues bulletins or messages to employees that are reinforced by supervisors in one-on-one or group discussions with employees.
- **Informing employees of safety actions taken in response to reports submitted through the ESRP:** LETS provides targeted communications to inform employees of safety actions taken in response to reports submitted through the ESRP, including handouts and flyers, safety talks, updates on the bulletin board, Pinto Mind TV, and one-on-one discussions between employees and supervisors.

Additional Information:

Supporting Documentation

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

LETS will maintain documentation related to the implementation of its SMS; the programs, policies, and procedures used to carry out this ASP; and the results from its SMS processes and activities for three years after creation. They will be available to the FTA or other Federal or oversight entity upon request.

Definitions of Terms Used in the Safety Plan:

LETS incorporates all of FTA's definitions that are in 49 CFR 673.5 of the Public Transportation Agency Safety Plan regulation.

- **Accident** means 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.
- **Accountable Executive** means a 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. 5326.
- **Equivalent Authority** means an 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** means any Accident, Incident, or Occurrence.

- **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.
- **Incident** means any real or potential condition 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** means the 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** 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 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 a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.
- **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 of measure, to be achieved within a time period required by the FTA.
- **Public Transportation Agency Safety Plan (or Agency Safety Plan)** means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
- **Risk** means the composite of predicted severity and likelihood of a potential effect of a hazard.
- **Risk mitigation** means a method or methods to eliminate or reduce the effects of a hazard.
- **Safety Assurance** means processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigations, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Management Policy** means 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** means the 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** means a performance target related to safety management activities.
- **Safety Promotion** means the combination of training and communication of safety information to support the SMS as applied to the transit agency's public transportation plan.
- **Safety risk assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risk.
- **Safety Risk Management** means the process within a transit agency's 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 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; (5) involves second or third-degree burns, or any burns affecting more than 5 percent of the body surface.

- **Transit agency** means an operator of a public transportation system.
- **Transit Asset Management Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, and rehabilitating, and replacing transit capital assets to manage their performance, risks, and cost 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.

Commonly Used Acronyms:

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
LETS	Livingston Essential Transportation Services
MDOT	Michigan Department of Transportation
MPO	Metropolitan Planning Organization
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SEMCOG	Southeast Michigan Council of Governments
SMS	Safety Management System
SRM	Safety Risk Management
U.S.C.	United States Code
VRM	Vehicle Revenue Miles