Nashville Metropolitan Transit Authority (MTA) dba WeGo Public Transit Safety Plan - Version 4

Revised July 2024

Safety Plan Version Activity Log

Version Number	Activity (Review/Update/Addendum/Adoption/Distribution)	Concerned Person (Signature)	Date Issued
1	Initial approved Agency Safety Plan	Rita Roberts-Turner	9/1/2020
2	Reviewed and updated Agency Safety Plan	Nicholas Oldham	12/15/2022
3	Reviewed and updated Agency Safety Plan	Nicholas Oldham	7/11/2023
4	Reviewed and updated Agency Safety Plan	Nicholas Oldham	2/28/2024
Insert Number	Click to insert text.	Click to insert text.	Insert Date.

Table of Contents

1. Transit Agency Information

Transit Agency Name	Nashville Metropolitan Transit Authority dba WeGo Public Transit		
Transit Agency Address	430 Myatt Drive, Nashville, TN 37115		
Name and Title of Accountable Executive	Stephen G. Bland, Chief Executive Officer The Accountable Executive meets the requirements in 49 CFR § 673.5 and $673.23(d)(1). Please see the Roles and Responsibilities of the Accountable Executive in Section 4-Safety Management Policy.		
Name of and Title of Chief Safety Officer	Nicholas Oldham, Chief Safety and Security Officer The Chief Safety Officer meets the requirements of § 673.5 and $673.23(d)(2). Please see the Roles and Responsibilities of the Chief Safety Officer in Section 4-Safety Management Policy.		
Mode(s) of Service Covered by This Plan	Fixed-route Bus Demand Response Bus Demand Response Taxi	**List All FTA Funding Types (e.g., 5307, 5310, 5311)**	5307, 5310, 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed-route bus – directly operated Demand response bus – directly operated Demand response taxi - contracted		
Does the agency provide transit services on behalf of another transit agency or entity?	YES	**Description of Arrangement**	The Nashville Metropolitan Transit Authority acts as a service contractor for the Regional Transportation Authority of Middle Tennessee (RTA). MTA operates the following fixed route RTA bus routes: 64 – Star Downtown Shuttle, 84 – Murfreesboro Express, 86 – Smyrna/LaVergne Express, 93 – Star West End Shuttle and 96 – Nashville/Murfreesboro Local.
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	Regional Transportation Authority (RTA) of Middle Tennessee dba WeGo Public Transit 430 Myatt Drive Nashville, TN 37115		

History of the MTA

As with many major American cities, Nashville-Davidson County has had a long and diverse history in the area of public transportation. Many different frameworks have been implemented with varying degrees of success. Both private and public organizations have contributed to the goal of providing safe, reliable, efficient, customer-friendly public transit as alternatives to driving alone.

In 1860, the McGavock and Mt. Vernon Horse Railroad Company and the South Nashville Street Railroad Company were chartered and used steam and mules to power rail cars to give Nashville its first taste of public transportation. On April 30, 1889, the McGavock and Mt. Vernon Horse Railroad Company operated the first electric streetcar in Nashville, and the city became one of the first in the nation to have such "modern" transportation.

From the years following the Civil War to the 1920's, numerous companies formed, consolidated, and disbanded as competition for passengers created a variety of financial and legal hardships for the struggling companies.

In 1926, motor buses were first introduced in Nashville to supplement the existing street railway service. The Tennessee Electric Power Company took over the controlling interest of the public transportation system in 1930, and in 1940-41 phased out Nashville's streetcar system.

In 1941, the name of the company was changed to Southern Coach Lines, Inc., and under still another reorganization, the name was changed to the Nashville Transit Company in 1953.

The next 20 years brought unprecedented growth and prosperity to Nashville, resulting in a dramatic increase in the use of the private automobile. Consequently, the number of people riding the bus decreased, and the health of the transit system deteriorated. Spiraling costs, higher fares, service cutbacks, and deferred maintenance meant lower quality transit service for those thousands of Nashvillians who still relied on the bus.

Realizing the importance of a solid public transit system, the Metropolitan Government of Nashville and Davidson County applied for a federal grant for the purchase of the Nashville Transit Company. They realized that a viable public transportation system contributes to a healthy economy by aiding in employment and reducing traffic congestion and air pollution. By September of 1973, the transfer from private to public ownership was completed, and the Metropolitan Transit Authority was officially chartered. A five-member Board of Directors was formed to oversee the operation of the Metropolitan Transit Authority. The MTA entered into a contract with a company to provide advisory and management services for the public transit system.

In August 1990, McDonald Transit Associates was awarded the contract to manage the day-to-day operation of the system. In turn, McDonald Transit Associates formed Davidson Transit Management, Inc. to employ the workers that operate the public transportation system. This contractual arrangement continued until early 2003.

On December 29, 1992, the employee unit changed from Davidson Transit Management to Davidson Transit Organization, a private, non-profit organization.

After the completion of a Metro audit and a quest for continual improvement, recent changes were made to the MTA organizational structure with the addition of a Chief Executive Officer, a Metropolitan

Government position. This position was developed to provide the strategic leadership necessary to carry the MTA well into the 21st century. The CEO reports directly to the MTA Board of Directors and is responsible for managerial oversight of the entire system. The CEO is the agency's only Metro government employee. Other personnel are employees of the Davidson Transit Organization, a private, non-profit organization.

Board of Directors

The Nashville Metropolitan Transit Authority (MTA) Board of Directors is a five-member panel appointed by the Mayor and approved by the Metro Council. They make policies regarding the operation of the MTA. MTA management oversees the day-to-day operation of the MTA following the guidelines set by the MTA Board of Directors.

Services provided by the MTA

WeGo Public Transit is the transit services provider of the Nashville Metropolitan Transit Authority (Nashville MTA) and Regional Transportation Authority of Middle Tennessee (RTA). WeGo Public Transit is the umbrella, public-facing name associated with transit services in Middle Tennessee but is not legally named as the operating bodies.

Nashville MTA is a component unit of the Metropolitan Government of Nashville and Davidson County responsible for public transit services within Metro Nashville-Davidson County and funded with federal, state, and local subsidies, as well as farebox revenue. The Nashville MTA is responsible for operating local transit services within Metropolitan Nashville-Davidson County. These services consist of 31 bus routes and a network of smaller ADA-accessible vans for its Access program for people with disabilities. The Nashville MTA is contracted to manage RTA services under a fee-for-service agreement. The two authorities share facilities, staff, and a chief executive officer.

Agency Safety Plan and Safety Management System (SMS)

We developed this safety plan to comply with 49 CFR Part 673, the PTASP regulation. This plan also serves as an "SMS user's manual" that guides us in the successful implementation and operation of our SMS. The FTA defines SMS as:

"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."

Furthermore, SMS is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry's existing safety foundation to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully. Our SMS has four distinct components, which we address in subsequent sections of this safety plan:

Safety management policy	Safety assurance
Safety risk management	Safety promotion

2. Plan Development, Approval, and Updates

Name of Entity that Drafted this Plan	Nashville Metropolitan Transit Authority (MTA) dba WeGo Public Transit	
Approval by the Safety Committee	**Name of Entity that Approved**	**Date of Approval**
	Safety Committee	
Signature by the Accountable Executive	**Signature of Accountable Executive**	**Date of Signature**
Approval by the Board of Directors or an Equivalent Authority	**Name of Entity that Approved**	**Date of Approval**
	MTA Board of Directors	
	Relevant Documentation (title and location)	
Certification of Compliance *(FTA Certs & Assurances through TrAMS)*	**Name of Individual/Entity that Certified This Plan**	**Date of Certification**
	Relevant Documentation (title and location)	

Annual Review and Update of the Agency Safety Plan
This WeGo Public Transit Agency Safety Plan and its safety performance targets will be jointly reviewed and updated by the Chief Safety and Security Officer/Safety Office and the joint labor-management Safety Committee. The review process will begin in January of each year to coincide with the budget process and be completed by July 20 of each year. Specifically, WeGo Public Transit will review its safety plan when it: a. Determines its approach to mitigation safety deficiencies is ineffective; b. Makes signification changes to service delivery; c. Introduces new processes or procedures that may impact safety; d. Changes of re-prioritizing resources available to support SMS; e. Significantly changes its organizational structure, and/or; f. By July 20, annually, pursuant to 49 CFR Part 673.11(a)(5).

The Accountable Executive will review and approve any changes, sign the new ASP, and forward to the MTA Board of Directors for final review and approval.

3. Safety Performance Targets

Safety Performance Targets as Reported to the National Transit Database (NTD)							
The targets listed below are based on reviews of the previous five years of MTA dba WeGo Public Transit'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 / failures)**
Fixed Route Bus	0	0	38	.52	34	.47	6,800
Demand Response Bus	0	0	10	.58	10	.58	20,000
Demand Response Taxi	0	0	0	0	0	0	0

Definitions

Reportable Event - A safety or security event occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a maintenance facility, during a transit related maintenance activity, or involving a transit revenue vehicle.

Fatality - A death or suicide confirmed within 30 days of a reported event. Does not include deaths in or on transit property that are a result of illness or other natural causes.

Injury - Any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene.

Safety Event - A collision, derailment, fire, hazardous material spill, act of nature (Act of God), evacuation, or other safety occurrence not otherwise classified occurring on transit right-of-way, resulting in injury requiring transport away from the scene for medical attention for one or more persons or an estimated property damage equaling to or exceeding $25,000.

System Reliability – Miles between major mechanical failures that prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns.

Safety Performance Targets Sent To Metropolitan Planning Organization		
WeGo Public Transit's Accountable Executive shares WeGo Public Transit's safety performance targets with the Greater Nashville Regional Council, the Metropolitan Planning Organization, each year after its formal adoption by the MTA Board of Directors. The Accountable Executive also provides a copy of our formally adopted Safety Plan to the Tennessee Department of Transportation (TDOT). WeGo Public Transit personnel are available to coordinate with TDOT and the MPO in the selection of TDOT and MPO safety performance targets upon request.		
Targets Transmitted to the State	**State Entity Name**	**Date Targets Transmitted**
	Tennessee Department of Transportation	
Targets Transmitted to the Metropolitan Planning Organization(s)	**Metropolitan Planning Organization Name**	**Date Targets Transmitted**
	Greater Nashville Regional Council	

Risk Reduction Program

We have developed and implemented a risk reduction program (RRP) that comprehensively looks to improve safety by formally identifying and analyzing hazards for the purpose of taking action to mitigate the risks associated with those hazards. Based on data submitted to the National Transit Database, the program aims to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers. The program also addresses reducing vehicular and pedestrian accidents involving buses and takes into consideration measures to reduce visibility impairments for bus operators that contribute to accidents as well as addresses the mitigation of assaults on transit workers. As an ongoing program that supports continuous safety improvements, we included the following measures:

- A risk-based hazard management program
  - The identification of hazards
  - Risk-based hazard analysis
  - Mitigation strategies for the risks resulting from those hazards
- A safety performance evaluation component
  - Safety monitoring of operational processes and systems
  - Safety assessment to assess the need for changes to a mitigation strategy
- A safety outreach component
  - To promote safety-critical information
  - Explain why RRP-related safety actions are taken
  - Explain why safety procedures are introduced or changed
- A technology implementation plan
  - The use of Scylla, an integrated camera technology, the leading real-time physical threat detection solution, will help with mitigating pre-defined hazards
- RRP implementation and support training
- Involvement of frontline employees in the establishment and implementation of the RRP

Public Health

MTA develops and implements strategies to minimize exposure to infectious diseases, through our safety risk management process, consistent with guidelines of the Centers for Disease Control and Prevention and State and local health authorities.

SAFETY MANAGEMENT POLICY STATEMENT

Safety is a core value of the Regional Transportation Authority of Middle Tennessee (dba WeGo Public Transit), and ensuring the safety of our customers, employees, and the public is a core business function of the authority. WeGo Public Transit is committed to developing, implementing, maintaining, and continuously improving processes. WeGo Public Transit will use safety management processes to direct the prioritization of safety and allocate its organizational resources—people, processes, and technology—in balance with its other core business functions. WeGo aims to support a robust safety culture, and achieve the highest level of safety performance, meeting all established safety standards. All levels of management and all frontline employees are accountable for the delivery of the highest level of safety performance, starting with the Chief Executive Officer.

WeGo Public Transit is committed to ensuring:

Executive Promotion of Safety: Executive Management will lead the development of an organizational culture that promotes safe operations and provides appropriate resources to supporting this core management function through fostering and ensuring safe practices, improving safety when needed, and encouraging effective employee safety reporting and communication. WeGo Public Transit will hold executives, managers, and employees accountable for safety performance.

Communication & Training: Employee engagement is crucial to a functioning Safety Management System. Communication systems will be put in place to enable greater awareness of WeGo Public Transit's safety objectives and safety performance targets as well as to provide ongoing safety communication up, down, and across the organization. All levels of management must proactively engage employees and work to keep the lines of safety communication honest and open. All employees will be made aware of the importance of WeGo Public Transit's Safety Management System and trained in safety reporting procedures.

Responsibility & Accountability: All levels of management will be responsible for delivering safe and quality transit services that represent WeGo Public Transit's performance of its Safety Management System. Managers will take an active role in the Safety Risk Management process and ensure that Safety Assurance functions are supported. Managers are responsible for ensuring that Safety Risk Management is being performed in their operational areas of control to assure that the safety risk associated with safety hazards is assessed and mitigated. Safety performance will be an important part of performance evaluations for WeGo Public Transit's managers and employees.

Responsibility of Employees & Contractors: All employees and contractors will support safety management by ensuring that hazards are identified and reported.

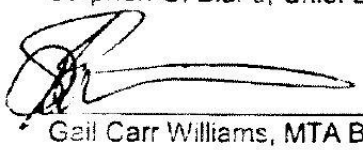
Employee Reporting: Executive management will establish a safety reporting program as a viable tool for employees to voice their safety concerns. All frontline employees will be responsible for utilizing this program as part of the Safety Management System. No action will be taken against any employee who communicates a safety condition through WeGo Public Transit's safety reporting program unless such disclosure indicates the following: an illegal act, gross misconduct or negligence, or a deliberate or willful disregard of WeGo Public Transit's rules, policies, and procedures by the reporting employee.

Review & Evaluation: WeGo Public Transit will measure Safety Management System performance by analyzing key safety performance indicators, reviewing inspections, investigations and corrective action reports, and auditing the processes that support the Safety Management System. These activities will become the basis for revising or developing safety objectives, safety performance targets and plans with the goal of continuous safety improvement.

Adopted:

Date

Stephen G. Bland, Chief Executive Officer



Gail Carr Williams, MTA Board Chair

Safety Management Policy Communication

The Chief Safety Officer leads all SMS activities and is responsible for communicating the Safety Management Policy Statement (SMPS) to all our employees. We communicate the SMPS through a combination of posting on notice boards and the intranet, and distribution at safety meetings, training sessions, and through emails.

Authorities, Accountabilities, and Responsibilities

Roles and Responsibilities of the Accountable Executive

Our Accountable Executive has ultimate responsibility for carrying out the Agency Safety Plan. The Accountable Executive has control or direction over the human and capital resources needed to develop and maintain this Agency Safety Plan.

The Accountable Executive is accountable for ensuring that WeGo Public Transit effectively implements its SMS throughout the agency and addresses SMS substandard safety performance. The Accountable Executive is responsible for signing SMS implementation planning documents and endorsing SMS implementation team membership.

The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for WeGo Public Transit's safety performance cannot be delegated and always rests with the Accountable Executive.

The Accountable Executive's roles include, but are not necessarily limited to:

- Decision-making about human and capital resources needed to support asset management, SMS activities, and capital investments;
- Maintaining the Transit Asset Management (TAM) Plan;
- Signing SMS implementation planning documents, and ensuring that SMS is effectively implemented throughout our public transportation system;
- Ensuring action is taken to address substandard performance in our SMS;
- Endorsing SMS implementation team membership, and;
- Other duties as assigned/necessary.

Roles and Responsibilities of the Chief Safety Officer

The CSSO has the authority and responsibility for developing, implementing, and operating our SMS. The CSSO reports directly to the Accountable Executive for matters involving SMS.

The CSSO's roles include, but are not necessarily limited to:

- Developing and maintaining SMS documentation;
- Directing hazard identification and safety risk assessment;
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive on SMS implementation progress;
- Planning safety management training, and;
- Other duties as assigned/necessary

Agency Leadership and Executive Management Roles

Members of WeGo Public Transit's leadership have authorities and responsibilities for the day-to-day implementation and operation of our SMS.

WeGo Public Transit Agency Leadership and Executive Management include:

- Chief Administrative Officer
- Chief Operating Officer
- Chief Financial Officer
- Chief Engineer
- Director of Planning and Grants
- Director of Marketing and Communications
- Director of Customer Care
- Director of Service Quality

Agency Leadership and Executive Management are responsible for the following accountabilities and responsibilities of this plan. Roles include, but are not necessarily limited to:

- Implementation and operation of our SMS, within the functions in which they have responsibility;
- Provide input into the allocation of resources within the functions in which they have the responsibility to accomplish the goals and objectives of the agency safety plan;
- Accountable for oversight, day-to-day operations, and maintaining compliance with the agency safety plan, within the functions in which they have responsibility; and
- Modify policies consistent with the implementation of the agency safety plan.

Key Staff Roles

Key staff within WeGo Public Transit have the following SMS accountabilities and responsibilities of this plan. Its roles include, but are not necessarily limited to:

- Assisting the CSSO in developing, implementing, and operating the SMS. Based on responsibilities and expertise, the key staff assists in hazard identification, safety risk assessment, safety risk mitigation, safety performance monitoring, safety performance measurement, safety training, and safety communication activities.
- Key staff plays a significant role as subject matter experts in hazard identification, safety risk assessment, safety risk mitigation, and safety performance monitoring activities.
- Key staff functions within WeGo Public Transit that bring experience and expertise to bear on SMS activities include:
    - Human Resource Manager
    - Security Manager
    - Director of Training
    - Safety Staff
    - Director of Maintenance
    - Manager of Vehicle Maintenance
    - Director of Operations
    - Facility Maintenance Manager
    - Transit Stop Manager
    - Senior Transit Planner
    - Access Ride Manager
    - Supervisors
    - Dispatchers

    - Bus Operators
    - Vehicle Mechanics, and
    - Other skilled professionals as needed.
- Operator Meetings: A permanent agenda item at all operator meetings is dedicated to safety. Safety issues are discussed and documented.
- Site Safety Council: The Council is the driving force for ensuring that reported safety issues, concerns, or conditions are appropriately addressed, and the originator of the report is notified of requisite action.
- Event Review Team: The team is a collection of subject matter experts representing various parts of the organization that convene post-safety events when investigation deems disciplinary action is necessary.

Safety Committee

The DTO Safety Committee consists of an equal number of frontline employee representatives and management representatives. The purpose of this new committee is to provide an avenue for all WeGo employees to contribute to workplace safety in hopes of achieving and maintaining a safe, healthy working environment. The goal of this committee is to make recommendations to reduce safety events down to an acceptable level by involving employees and management in identifying hazards and recommending mitigations to reduce the probability and severity of the consequences of those hazards, identify mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended, and identify safety deficiencies for purposes of continuous improvement. This can be facilitated by reviewing information related to safety events. The Safety Committee must approve all revisions in the Agency Safety Plan prior to Board Approval and that approval must be noted in the ASP.

Employee Safety Reporting Program

We have established and implemented a formal safety reporting program that allows our employees and contractor employees to voluntarily report any safety issues, conditions, or concerns they may see during their day-to-day delivery of transit services. This voluntary safety reporting program is separate from our mandatory reporting requirements for accidents and incidents.

The employee safety reporting program (ESRP) provides protections for employees who report safety issues, concerns, or conditions. It ensures that discipline will not be applied, and employees have protection against reprisal or any other adverse action for reporting a safety issue, concern, or condition. The ESRP also describes employee behaviors that are not protected under the program and may result in disciplinary action, such as an employee engaged in an illegal act, committed gross negligence, or deliberately or willfully disregarded regulations or WeGo Public Transit procedures. Employees who report safety issues, concerns, and conditions are also generally protected under Occupational Safety and Health Administration whistleblower protections.

The ESRP clarifies:

- What to report, what not to report, and how to report;
- What managers should do when employees report safety concerns;

- How reports are documented; and
- How employees will receive feedback about the results of their reports.

The reporting system is simple to use and available to all WeGo Public Transit and contractor personnel. Our ESRP addresses the following:

- Who is responsible for developing and managing the employee safety reporting program;
- Timely response to employee safety reports.
- How the agency provides feedback to employees on the action(s) taken to address the reported safety issue, condition, or concern;
- Investigation of reported safety issues, conditions, or concerns for causal or contributing factors.
- How the transit system documents and reviews safety issues, conditions, or concerns to determine if a hazard exists; and
- If the issue is determined to be a hazard, how the hazard is entered into the safety risk management process.

We are committed to providing feedback to internal and contractor employees who report a safety issue, condition, or concern. This feedback is provided either directly in a one-on-one conversation or through the safety meeting platform. The feedback addresses what, if any action, will be taken to address the reported safety issue, condition, or concern. There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the daily Operations log.
- Report conditions directly to any supervisor, manager, or director.
- Report conditions anonymously via our reporting website: https://trackitnearmiss.com/42332424786454-2/
- Report conditions using their name or anonymously to WeGoSafety@nashville.gov
- Report conditions via our safety hotline: 615-862-4666

Our ESRP includes the availability of a short, one-page safety reporting document for employees to fill out or supervisors to fill out if an employee reports a safety issue, condition, or concern verbally. Dispatchers/radio operators keep a hazard log to record issues, conditions, or concerns reported via radio by bus operators.

We have also established an employee hotline that internal and contractor employees can use to leave a recorded message about safety issues, conditions, or concerns they may have. We monitor the hotline daily and document reported safety issues, concerns, or conditions for analysis.

More detailed documentation of the ESRP is kept in the CSSO's office. We ensured that a description of the ESRP was provided to all current employees during the orientations on employee safety reporting. New employees receive information on our ESRP during new-hire orientation.

5. Safety Risk Management

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

The CSSO leads the SRM process, at times working with the Safety Committee to identify hazards and consequences, assess the safety risk of potential consequences, and mitigate the safety risk. The results of the SRM process are documented in the Safety Risk Register and referenced materials.

The SRM process applies to all elements of the system, including operations, maintenance, facilities, vehicles, personnel recruitment, employee training, supervision, and other functions as appropriate.

Overall, our SRM process includes the following steps that are carried out under the guidance of the CSSO, with input from appropriate subject matter experts:

- Identify hazards
- Identify the potential consequences of each hazard
- Evaluate consequences in terms of probability and severity
- Prioritize risk using our formal risk matrix
- Communicate prioritized risk to the Accountable Executive
- Based on the Accountable Executive's approval, create safety risk mitigations to eliminate or reduce the effects of hazards.
- Implement the mitigation
- Create a strategy for monitoring mitigation effectiveness

In carrying out the SRM process, we use the following terms:

- **Safety event** – Any accident, incident, or occurrence.
- **Hazard** – Any real or potential condition that can cause injury, illness, death, damage to/loss of facilities, equipment, rolling stock, or infrastructure belonging to WeGo Public Transit, 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 WeGo Public Transit property or the environment.

Safety Hazard Identification

All subsequent safety risk management activities are contingent on effectively identifying sources for hazard identification, and the processes to obtain information on hazards.

We developed methods and processes to identify hazards and consequences of the hazards. As sources for hazard identification, we consider data and information provided by our Board of Directors, the FTA, and TDOT. We also consider the results of its asset condition assessments when performing safety

hazard identification activities through our SMS. The results of the condition assessments and safety risk management activities help inform our determination on whether an asset meets the state of good repair standards under 49 CFR Part 625.

The CSSO is responsible for overseeing WeGo Public Transit's hazard identification process. Safety Staff are responsible for facilitating and documenting identified hazards and ensuring that subject matter experts identify the potential consequences of those hazards. Information related to hazard identification and consequence determination is stored in our Safety Risk Assessment Register, where we document all identified hazards and the subsequent activities related to addressing those hazards.

The safety hazard identification process helps us identify hazards and potential consequences in the operation and maintenance of our system. We identify hazards through a variety of sources, including:

- Our employee safety reporting program;
- Contractor safety reporting;
- Review of vehicle camera footage;
- Reviews of monthly performance data and safety performance targets;
- Observations by and reports from supervisors;
- Reports from Dispatchers, radio operators, and trainers;
- Pre- and post-trip vehicle maintenance reports;
- Maintenance reports;
- Comments from customers, passengers, and third parties;
- Reviews of information concerning bus operator assaults;
- Safety Committee and Safety Meetings;
- Results of audits and inspections of vehicles and facilities;
- Results of training assessments;
- Results of internal safety audits;
- Investigations into safety events, incidents, and occurrences;
- City and County road condition reports;
- TDOT fleet inspections and audits; and
- FTA and other oversight authority agencies.

Safety Staff enter hazards into the Safety Risk Register as a result of reviews of our operations and maintenance, results of audits and observations, and information received from FTA and other oversight authorities, including the National Transportation Safety Board.

Safety Staff may conduct further analysis of hazards and consequences entered into the Safety Risk Register to collect information, identify additional consequences, and to inform management which hazards should be prioritized for safety risk assessment. In following up on identified hazards, Safety Staff 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, assess the possible hazardous condition/s, generate visual documentation (photographs and/or video), and take any measurements that are 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 (such as 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 previously reported hazards of a similar nature; and
- Evaluate tasks and/or processes associated with the reported hazard.

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 for safety risk assessment and mitigation. This signifies the CSSO's belief that immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment.

We involve subject matter experts in our safety hazard identification processes by matching the experience and expertise of the individual(s) with the type of hazard to be analyzed. For example, if the hazard is operations related, then the primary subject matter experts will be from operations; if the hazard is vehicle maintenance related, that type of hazard requires vehicle maintenance expertise and skills.

Determination of the potential consequences of hazards drives our safety risk assessment activities. Hazards in and of themselves do not cause damage. It is the consequences of hazards that cause injuries and death, destroy property, harm the environment, or impair the ability of a transit provider to deliver transit services. Our subject matter experts identify the potential consequences of hazards, keeping in mind that a single hazard could have many potential consequences. Each potential consequence is identified and recorded.

The Safety Office is responsible for documenting hazards and their potential consequences, and the CSSO is responsible for ensuring this documentation is occurring. Documentation is stored in the Safety Office.

The Access Ride Manager ensures that the demand response taxi contractor has a process for identifying hazards and determining their potential consequences.

Safety Risk Assessment

We established processes to assess the safety risk associated with identified safety hazards. These safety risk assessment processes include an assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations and prioritization of the hazards, based on the safety risk.

Assessing the likelihood and severity of hazard consequences is the first step in prioritizing safety risk. We established procedures for assessing the safety risk of the consequences of identified safety hazards and prioritizing the hazards based on this safety risk. We assess safety risk in terms of likelihood (the probability of a consequence occurring) and severity (the seriousness of a consequence, if it does occur). A color-coded safety risk index provides a rating system to use with a safety risk assessment matrix to

prioritize safety risk. The safety risk assessment matrix helps us determine the probability and severity of consequences and allows for prioritization of safety risk. We present our safety risk assessment risk matrix in Appendix E.

We choose subject matter experts to involve in safety risk assessment by matching the experience and expertise of subject matter experts with the type of hazard under assessment. This assessment is carried out under the guidance of Safety Office using the aforementioned safety risk assessment matrix.

Safety risk prioritization is linked to safety risk mitigation creation. Prioritizing our safety risk provides the Accountable Executive with the information needed to make decisions about resource application. It helps us apply our limited time, financial, and human resources to the highest priority transit safety risk.

The Accountable Executive, with input from the CSSO, is the ultimate decision-maker on applying resources to mitigate high priority transit safety risk. Therefore, high priority transit safety risks are communicated to the Accountable Executive. We defined and documented this process and the criteria for when high priority transit safety risks need to be elevated to the Accountable Executive. Responsibility for communicating high priority safety risk to the Accountable Executive resides with the CSSO.

The Access Ride Manager ensures that the demand response taxi contractor provides descriptions of their safety risk assessment activities and communicates the results of those activities to WeGo Public Transit.

Safety Risk Mitigation

Developing safety risk mitigations to proactively reduce our safety risk is the culmination of the safety risk management process. We established processes to identify mitigations or strategies to address the results of our safety risk assessment activities. These activities help us reduce the likelihood and severity of the consequences of identified hazards. The Safety Office is responsible for guiding and overseeing the subject matter experts during the risk mitigation process. The CSSO reviews any safety risk mitigations requiring additional resources or changes in agency policy and presents them to the Accountable Executive for approval.

We established procedural steps for creating safety risk mitigations to address the potential consequences of our prioritized risk. The steps include how we determine when safety risk mitigation is necessary, and the job function(s) or position(s) that is responsible for creating mitigations. Within these procedural steps, we reference any forms to create mitigations and describe how we record the results of this activity and where these recorded results are stored or maintained. We understand that the goal of mitigation is to reduce assessed safety risk to an acceptable level. It is unrealistic that our agency can assume that it will be able to completely eliminate all safety risk.

WeGo Public Transit's safety risk mitigation steps include:

- Examining the consequences of hazards and their probability and severity
- Develop strategies to reduce the probability and/or severity of those consequences

- Ensure the strategy can be realistically implemented with available resources
- Turn the strategy into a mitigation plan
- Put the mitigation plan into place
- Create a plan for monitoring the effectiveness of the mitigation

After creating a safety risk mitigation, subject matter experts under the guidance of the Safety Office develop and document a strategy for implementing the mitigation. These implementation strategies include:

- who is responsible for implementing the mitigation;
- where the mitigation will reside within agency activities;
- how the mitigation will be implemented, and;
- how long implementation should take.

We need to know that our mitigations are working. When we develop a mitigation, we also define and document the way the mitigation will positively impact safety performance so we can then monitor whether that positive impact is taking place, and if the mitigation is effective. Under the guidance of the Safety Office, the subject matter experts involved in creating a safety risk mitigation also decide on the best ways to monitor the effectiveness of the mitigation being implemented. This includes developing and documenting monitoring strategies. We create strategies for monitoring the effectiveness of mitigations. These strategies provide consistency in monitoring activities regardless of whether the mitigation is implemented in operations, maintenance, or administration.

We understand that successful mitigation implementation and monitoring activities depend on having a process for how we will formally communicate mitigation and monitoring strategies to operations, maintenance, or administration staff who will implement and monitor the mitigations. The Accountable Executive and CSSO review risk mitigation methods to mitigate or eliminate safety risk associated with specific hazards as recommended by the Safety Committee. Those methods are placed in the Safety Risk Register and made available upon request.

Strong documentation of safety risk mitigations feeds safety performance monitoring. We established and documented how we record all of our various safety risk mitigation activities and their outcomes. Within this process, we reference any forms that we use during safety risk mitigation activities and where the completed records of safety risk mitigation activities are stored.

The Access Ride Manager ensures that the demand response taxi contractor provides a description of its safety risk mitigation processes and communicates the results of those activities to WeGo Public Transit.

Safety Risk Management Documentation

The documented SRM processes for hazard identification, safety risk assessment, and safety risk mitigation are on file in the CSSO's office. The Safety Office maintains the documentation of the results of the SRM activities that we carry out.

6. Safety Assurance

We have processes in place to:

- Monitor our operations for compliance with and sufficiency of its policies and procedures;
- Monitor vehicle and facility maintenance to ensure that performed maintenance is consistent with safely meeting its operational requirements and maintenance activities are compliant with all regulatory requirements, policies, and procedures,
- Monitor our operations and vehicle maintenance function to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- Conduct investigations of safety events to identify causal factors, and;
- Monitor the effectiveness of our employee safety reporting program.

Safety Performance Monitoring and Measurement

We have many processes in place to monitor our entire transit system for compliance with operations and maintenance procedures, including:

- Safety audits;
- Informal inspections;
- Regular review of on-board camera footage to assess drivers and specific incidents;
- Safety surveys;
- Investigation of safety occurrences;
- Safety review prior to the launch or modification of any facet of service;
- Daily data gathering and monitoring of data relating to the delivery of service, and;
- Regular vehicle inspections and preventative and corrective maintenance assessments.

Internal reviews are performed to ensure that all areas of WeGo Public Transit are in compliance with external regulatory requirements and our internal policies and procedures. The major issues and activities involved in performing the internal safety review include:

- Examination of documentation
- Analysis of safety data and information
- Observation of equipment, facilities and in-process tasks
- Evaluation of system operations and policies and procedures
- Interviews with management and relevant staff
- Examination of maintenance procedures and recall information

Examples of documentation we review include the Agency Safety Plan, Standard Operating Procedures, Emergency Procedures, the Hazardous Materials Management Plan, Administrative Procedures, the Rule Book, and Safety Rules.

TDOT also conducts external reviews/audits.

Results from the above processes are compared against recent performance trends to determine where corrective actions need to occur. Any identified non-compliant or ineffective activities, including any resulting mitigations, are put back through the SRM process for reevaluation.

Operations Monitoring

Operations management and supervision, Safety Staff, and Training Staff are responsible for ensuring and documenting the system's compliance with and sufficiency of its operations policies and procedures. We have checklists and forms that we use to drive and document our operations monitoring activities. This documentation is stored within our safety performance monitoring files located in the Safety Office.

The operational areas that we monitor for compliance with policies and procedures include but are not limited to:

- Bus operator pre-trip inspections;
- Bus operator behind the wheel performance;
- Bus operator passenger assistance;
- Bus operator emergency response, and;
- Operation Supervisor and Dispatch activities.

When our monitoring activities determine a lack of compliance with operations policies and procedures or inadequacies of those policies and procedures, we then use this information to feed our hazard identification and safety risk assessment process.

Within these documented processes, we describe:

- the job functions responsible for the different areas of field observations;
- how it will record the results of field observations;
- where these records are stored, and;
- how it will address hazards or safety issues identified during field observations.

We have documented emergency procedure checklists that supervisors and dispatchers can readily access to help direct their response to bus operators who may experience an emergency during revenue service. These procedures include, but are not limited to:

- Severe weather (snow or flooding)
- Traffic accidents
- On-board smoke or fire
- Collisions
- Passenger injury or illness (use of bodily fluids kit)
- Improper or dangerous conduct by a passenger
- Theft of property
- Accident/Incident Procedures
- Suspicious Packages

We have a process for monitoring the demand response taxi contractor to ensure it performs services consistent with its safety-related policies and procedures. These monitoring activities are carried about

by the Access Ride Manager and Operations Supervisors. These activities are documented and on file in the Access Ride Manager's office.

Vehicle Maintenance Monitoring and Defect Reporting
We monitor the following areas within our vehicle maintenance function and document all monitoring activities and their results:

- Adherence to preventive maintenance schedules;
- Effectiveness of corrective maintenance activities, and;
- Maintenance-related vehicle road calls
- Safety defect reporting process

The Vehicle Maintenance Manager regularly:

- monitors compliance with the preventive maintenance schedule,
- reviews defect cards and work orders related to corrective maintenance activities, and
- reviews road call activities, including the thirty-day history of maintenance performed on vehicles that have had road calls.

Maintenance Supervisors regularly monitor and document mechanic preventive and corrective maintenance performance. We use this information to drive mechanic coaching, training, and discipline.

We employ a contractor that performs maintenance audits on all vehicles of each fleet type and provides Maintenance Management with a list of defects it finds. These audits provide ongoing information that drives the improvement of maintenance practices.

Vehicle Safety Defect Reporting: Operators complete pre- and post-trip vehicle inspections using an approved WeGo inspection log to report safety or mechanical defects and turn the completed forms into Dispatch. If a safety or vehicle defect is reported on these forms, radio room personnel contact the Maintenance Department, and the vehicle is checked and repaired or placed out of service. All other defect reports are placed in the Maintenance Vehicle Field Report mailbox for review. Maintenance staff collects the form and creates a work order in the Asset Works Fleet Management program. The work order is assigned to a mechanic, and necessary repairs are completed. Details are entered into the Asset Works program, and all related documentation is placed in the vehicle's file. The pre/post-trip form and pre-post trip book are signed off by the mechanic and faxed back to Dispatch. The vehicle is then returned to service.

Facility, Shop, and Hazardous Materials (HAZMAT) Safety Inspections
The Chief Engineer is responsible for ensuring safety inspections of facilities. Facility safety inspections are performed monthly and documented on a checklist. Facility Maintenance Staff ensure any identified conditions are addressed.

Rail stations serve as bus transfer centers and are inspected quarterly. These inspections are documented, and conditions that need to be addressed are resolved.

Bus stop maintenance is the responsibility of the Chief Engineer and the Transit Stop Manager. Bus stop maintenance includes trash removal, cleaning, and general safety inspections. These inspections are documented, and conditions that need to be addressed are resolved.

All WeGo Public Transit facility maintenance documentation is kept on file in the Chief Engineer's office.

Maintenance Management and the Safety Office carry out shop safety inspections. Inspections are conducted monthly, and documented records are stored in the Safety Office.

We perform periodic HAZMAT inspections that include reviewing Safety Data Sheets, HAZMAT container labeling, and availability of HAZMAT response equipment, such as eye-wash stations. These inspections also include reviewing employee response procedures for HAZMAT release, including "Right to Know" training on self-protection from HAZMAT release and HAZMAT disposal procedures. Inspections are documented and on file in the Safety Office.

Fire Hazard and Fire Extinguisher Inspections
External experts conduct periodic fire hazard inspections on all WeGo Public Transit facilities. The transit agency ensures any identified fire hazards are addressed.

External experts annually inspect and charge all fire extinguishers mounted throughout WeGo Public Transit facilities.

Fire hazard and fire extinguisher inspection documentation is on file in the Chief Engineer's office.

Our mechanics regularly inspect the functionality of on-board fire extinguishers on all transit vehicles and replace extinguishers as needed.

Field Observations of Service Delivery
We documented our processes for conducting field observations of safety-related aspects of the following elements of service delivery:

- bus stops;
- bus transfer locations;
- fixed-route schedules and service delivery;
- demand response scheduling; and
- demand response service delivery, both directly operated and contracted.

The CSSO has overall responsibility for ensuring that this monitoring is carried out and documented. The actual monitoring is carried out jointly by Transit Planners, Operations Supervisors, and Safety Staff. If deficiencies are noted during the monitoring process, they are addressed through our safety risk management processes. Transit Planners, Operations Management, and Safety Staff are involved in determining the changes to make if monitoring activities determine the need for route, schedule, bus stop, or transfer location changes.

Documentation of all service delivery changes is on file in the office of the Director of Planning and Grants.

Risk Mitigation Monitoring
The CSSO is ultimately responsible for monitoring operations to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended. The actual field monitoring of the mitigations is often carried out by subject matter experts, including those that assisted in the creation of the mitigation of the SRM process.

We document how we carry out these monitoring strategies to periodically assess the effectiveness of safety risk mitigations.

Activities to monitor the effectiveness of safety risk mitigations ultimately assist us in determining whether:

- the existing mitigation is working as desired;
- the existing mitigation needs some modification to work as desired;
- the existing mitigation is not working and needs to be replaced, or;
- the existing mitigation is no longer needed.

The results of mitigation monitoring activities are made available for further safety risk management activity if needed. Mitigation monitoring documentation is stored in the Safety Office.

Safety Event Investigation
Operations Management and the Safety Office share responsibility for our safety event investigation process. Actual performance of safety event investigations, including identifying causal factors, involve not only Operations Management and the Safety Office but also subject matter experts, as appropriate, from across the agency. Local law enforcement responds to accident scenes, as well.

Safety event records provide critical baseline information to support SMS implementation, operation, and safety performance target achievement.

We have documented procedures for safety event investigation, as well as forms consistent with industry standards for documenting the results of safety events and subsequent investigations. Safety event documentation is on file in the Safety office.

On-Route Safety Issue Reporting Procedures: All safety events are reported by the operator to the radio operator via two-way radio communication. Radio operator will advise the driver if an incident report must be completed and/or refer the issue to Operations and/or the Safety Office if necessary. If an incident or accident occurs, the operator or reporting staff will complete the incident or accident report packet and turn into Dispatch. Safety event report packets are placed in the Operation and Safety Staff mailboxes for review. The Operations Managers or Safety Staff will make a determination of whether a retraining form must be completed and distributed to the Training Department as necessary for follow up.

Operations Supervisors and Safety Staff investigate all accidents. When assuming the new role of Operations Supervisor or Safety Staff, accident/incident investigation training in required. That training consists of the correct processes and procedures to complete a thorough investigation as well as the proper use of specific forms. That training is logged in our completed training database. They review accidents against NTD reporting criteria for causes and contributing factors. Operators are interviewed, and a full investigation report filed. The Safety Office classifies all accidents regarding preventability and re-training. The Safety Office also makes recommendations for termination of employment for preventable accidents based on specific circumstances. Necessary disciplinary actions and re-training are conducted in a timely manner.

Full investigation reports with photos and video are distributed to the Insurance Company. The Safety Office maintains an accident/incident file on all employees. All preventable accident/incident information, including disciplinary action, is also sent to Human Resources for placement in employee personnel files.

Analysis of accidents requires the Chief Operating Officer's review and signature upon completion of establishing cost of repairs, confirmation of personal injury, and determination of lost workdays.

All safety event investigation reports are filed by date and case number and retained as required within the Safety Office.

We take the process a step further and perform causal analysis of safety events to help determine if latent organizational factors, beyond individual employee behavior, may have contributed to an event. We document the results of causal analysis on a causal analysis form. Records of the results of the analysis are kept in the CSSO's office.

Results of this analysis for causal factors provide potential hazard identification information that may need to be put through our safety risk management process to reduce the potential risk of recurrence of a similar accident or incident.

Operations Supervisors respond to the safety events of the demand response taxi contractor. Both the Safety Office and the Access Ride Manager maintain copies of the contractor's safety event records.

Monitoring the Employee Safety Reporting Program

An effective ESRP supports hazard identification. The CSSO has ultimate responsibility for monitoring our ESRP.

We documented the activities we use on an ongoing basis to monitor whether our ESRP is effective and achieving desired outcomes. Within this process, we established criteria that we use to help us determine if the program is performing as desired. Some of the criteria include:

- the volume of reports received,
- the value of reports received,
- response to reports received in terms of hazard identification risk assessment and risk mitigation,

- how information gathered from the ESRP is shared and communicated, and
- the timeliness and accuracy of feedback provided to employees who have reported a safety issue, concern, or condition.

We also monitor a range of other internal safety reporting programs, such as Occupational Safety and Health Administration (OSHA) reporting, information collected on safety events that is shared with insurance companies or pools, results of drug and alcohol testing programs, results from customer service reports, results of internal reviews and assessments, outputs from data systems that track safety performance information to help monitor the effectiveness of the ESRP. Documentation of all aspects of safety reporting program monitoring is stored in the CSSO's office.

Safety Performance Measurement

We are committed to periodically measure our safety performance. This measurement includes safety performance indicators to measure the achievement of our safety performance targets and also how well we do in addressing safety risk within every aspect of our service delivery. Documentation of periodic performance measurement results is on file in the CSSO's office.

Management of Change

Like most transit agencies, we experience change due to expansion and contraction of our service delivery, as well as changes to our existing systems, equipment, policies, programs, services, and regulations. Hazards may inadvertently be introduced into our system whenever change occurs. Existing baseline safety risk mitigation processes may also be impacted. Safety management practices require the hazards resulting from change be systematically identified, and strategies to manage the consequential safety risk be developed, implemented, and subsequently evaluated. Sound management of safety risks associated with change is a critical requirement of our SMS.

We implemented a procedure that establishes a process to ensure notification and review of proposed changes. We will not make changes to our systems and subsystems before first determining how the change might affect the safety of our system. The proposed modification will be evaluated for its potential to create additional hazards or reduce the effectiveness of existing mitigations.

The Chief Operating Officer and the CSSO are jointly responsible for our management of change process. Subject matter experts from up, down, and across the transit agency are involved in supporting the management of change process.

We documented our management of change process that describes the following:

- How to identify changes from internal sources
- How to identify changes from external sources
- Consideration for managing unplanned changes in the operating environment
- How to assess changes
- The use of the SRM process to evaluate the risk of proposed changes
- Recordkeeping and documentation of management of change activities
- The role of all service delivery support functions in the management of change process

Documentation of the management of change process is stored in the CSSO's office. Documentation of specific management of change activities is stored within the Safety Office.

Continuous Improvement

We monitor and assess the effectiveness of our SMS processes to enable continuous improvement of the overall performance of our SMS. We established multiple processes to assess our safety performance and facilitate continuous improvement. Through our continuous improvement process, we develop and carry out plans to identify safety deficiencies by:

- Prioritizing identified deficiencies
- Creating strategic initiatives to overcome those deficiencies
- Reevaluating progress on our improvement measures through our overall SMS

The CSSO, supported by Safety Staff and all service delivery related functions, has responsibility for our continuous improvement process. The Safety Office, with input from appropriate subject matter experts, is responsible for developing plans to address identified safety performance deficiencies. Each department has responsibility for carrying out plans to address identified safety performance deficiencies based on their sphere of responsibility and influence.

Appropriate subject matter experts are involved in the safety performance assessment process designed to identify safety performance deficiencies and mitigate those deficiencies.

Our documented continuous improvement process is stored in the CSSO's Office. Documentation of identified safety performance deficiencies and mitigations to reduce those deficiencies is stored in the Safety Office. Lastly, the development and carrying out of any continuous improvement plan(s) to address identified safety deficiencies occurs under the direction of the Accountable Executive.

7. Safety Promotion

Competencies and Training

Under the guidance of the CSSO, the Director of Training has the overall responsibility for the development, delivery, and documentation of all SMS-related safety skill competencies and SMS training.

We established competencies and training for all personnel directly responsible for safety. This includes the development and delivery of training on safety skill competencies and SMS training. This training focuses on providing safety-related skills at-hire and on an ongoing refresher basis.

We use the Track-It software program to guide our response to training issues and skill development challenges.

Training Needs Analyses
We periodically conduct training needs analyses to ensure that our training is up-to-date and addresses critical, safety-related concerns. We conduct training needs analyses by:

- Reviewing existing job descriptions;
- Identifying which positions, including contractors, have direct responsibility for determining when safety training is needed;
- Determining what SMS roles, responsibilities, and processes are missing from job descriptions, and;
- Updating job descriptions to reflect SMS practices.

New-Hire Bus Operator Training Program
We have comprehensive lesson plans for all new-hire bus operator training.

We compiled our new-hire bus operator lesson plans and training schedules into one master instructor guide. Lesson plans and schedules not only assist the instructor in delivering the training, but they also provide a record of the content of the training should it be needed for any other purpose. The new-hire bus operator lesson plans and schedules are kept on file in the Director of Training's office.

Content of new-hire bus operator training program includes but is not limited to:

- Equipment familiarization
- Defensive driving
- Pre- and post-trip inspection procedures
- Reporting vehicle defect procedures
- Radio communication
- Fare management
- Customer service and sensitivity
- Passenger assistance and securement
- Managing aggressive/dangerous passenger behavior
- Safety equipment requirements

- Safety event management and reporting
- Emergency evacuation procedures
- Route knowledge

New-hire bus operator training includes a combination of classroom training, hands-on training with a training instructor, and behind-the-wheel training with an experienced operator.

Bus Operator Refresher Training
Presently, we provide periodic bus operator refresher training at least annually on a variety of critical safety topics and skills.

TDOT mandates certain refresher training initiatives for all critical transit agency job functions. We have lesson plans, agendas, and sign-in sheets to document the content of refresher training and individual attendance at that training. These documents are on file at the Director of Training's office.

Operator safety issues are monitored at the first instance by the WeGo Trainer. Once every two years, Operators and other employees are required to take a safety training test based on the tools, safety manuals, and procedures they are given. They are provided time to read the information and then tested to be sure they are familiar with the rules. Employees give feedback on ideas and areas needed to be covered in the future. The Training Department keeps testing results.

All employees that drive WeGo owned vehicles or drive as part of their jobs must attend a defensive driving course provided once every three years, at a minimum. Any driver involved in a motor vehicle accident or receiving a traffic violation may, at the discretion of the Safety Office, be required to attend more often. Habitual offenders will have their driving privileges revoked.

WeGo Public Transit also provides retraining for Bus Operators for performance deficits. If the Operator or staff has accountability relating to a safety event or customer complaint, a retraining form is completed, and the Operator/staff is retrained. All retraining documentation is signed by the employee and Trainer and filed in the Operator/staff personnel file and/or TrainCaster. Any Operator behavior determined to be "at-risk" results in Operator retraining. Any Operator behavior determined to be reckless results in punitive/disciplinary measures.

Operations Supervisors and Dispatch Training
Supervisors and dispatchers play a critical role in identifying and responding to hazards and helping to both proactively and reactively mitigate risk. Training for operations supervisors and dispatchers primarily consists of mentoring, coaching, and on-the-job training.

Mentoring, coaching, and on-the-job training are very appropriate training approaches, but ones that need to be guided by a structured agenda of topics. We have checklists of topics for experienced supervisors and dispatchers to use during on-the-job training, coaching, and mentoring of trainees.

These checklists are also used to document an employee's satisfactory completion of the training and include instructor and trainee signatures and the dates the training took place. These documents are kept on file in the Director of Training's office.

Maintenance Training

We have an expanding vehicle maintenance technician apprenticeship program designed to move technicians into a fully qualified A-mechanic in three or four years. This program is competency-based and includes classroom instruction and observed and documented evaluation of a technician's skills as they progress through the program. This apprenticeship program supports SMS requirements for ongoing vehicle maintenance skill development.

Additionally, supervisors regularly coach vehicle maintenance technicians on required maintenance skills as they carry out their job responsibilities.

SMS Orientation

A cross-functional and multi-level understanding of SMS supports all SMS-related activities. Successful SMS implementation and operation require employee involvement and ownership at every level of the agency and within every service-delivery related function. Employees need to understand SMS; what their role is within SMS; and how they, the organization, and customers benefit from SMS success. This knowledge will nurture employee "buy-in."

WeGo Public Transit presented SMS orientation sessions for all employee functions and addressed the implications of SMS for all agency functions. This initiative addressed SMS with experienced employees. We also plugged information on SMS into all new-hire employee orientations. Documentation of these orientations, including agendas of topics covered, signatures of trainer/trainee, are kept on file in the Director of Training's office.

Safety Risk Management Orientation for Subject Matter Experts

Successful proactive safety risk mitigation begins with subject matter experts who have a clear understanding of their responsibilities and the skills required to carry them out.

Employees who participate in safety risk management activities as subject matter experts need to understand how to carry out their responsibilities. The CSSO and Safety Staff make sure that subject matter experts are orientated on their safety risk management responsibilities, the desired outcomes of safety risk management activities, and the importance of the effort to WeGo Public Transit's safety performance.

Documentation of the orientation process, as well as the orientations themselves, includes how the agency:

- assesses hazards for consequences;
- conducts safety risk assessments, and;
- creates safety risk mitigations.

The Safety Office maintains documentation of safety risk management orientation activities.

Safety Performance Monitoring Orientation
The quality of safety performance monitoring is reflected in an agency's overall positive safety performance. Employees who participate in safety performance monitoring activities need to know how to carry out their responsibilities. The CSSO and Safety Staff make sure that these employees receive orientations on what their responsibilities are, the desired outcomes of safety performance monitoring, and the importance of the effort to overall agency safety performance.

Orientations include how to perform monitoring activities of both internal and contracted operations as well as external maintenance activities. Performance monitoring includes such activities as:

- field observations to ensure operations and maintenance policies and procedures are being followed correctly;
- assessing and documenting employee safety performance; monitoring the effectiveness of safety risk mitigations, and;
- evaluating the effectiveness of the employee safety program.

Content and delivery of safety performance monitoring orientations involve not only the Safety Office but also operations management, maintenance management, vehicle maintenance management, facility maintenance management, Planning and Grants staff, Service Quality staff, and other staff as appropriate.

The Safety Office maintains documentation of safety performance monitoring orientations.

Orientation on Employee Safety Reporting Program
An effective ESRP is one of the most important tools for hazard identification.

Our ESRP, at a minimum, provides the following information:

- the purpose and benefits of the program;
- guidelines on the types of safety concerns and issues employees should report;
- the reporting methods available to employees (how to report);
- an explanation of how the information will be managed and shared;
- the protections for employees who report safety concerns;
- a description of the operational behaviors that are not protected and may result in discipline, and;
- the agency's commitment to providing feedback on reported safety concerns.

The Director of Training is responsible for ensuring that all employees receive an orientation on the ESRP. Agendas of the ESRP orientation and attendance records are on file in the Director of Training's office.

The Access Ride Manager is responsible for ensuring that employees of the demand response taxi contractor receive orientations on the ESRP.

Conflict Management and De-escalation Training
Our training department has developed conflict management and de-escalation training and continuously trains employees throughout the year. Our de-escalation training includes:

- Situational awareness
- Recognizing early warning signs of aggressive behavior
- Slowing down intense emotional reactivity
- Techniques for calming individuals and oneself
- Handling intense situations with the priority of keeping everyone as safe as possible
- Managing ones own emotional needs and how to remain safe

We have also enlisted the help of safety consultant, Ream Lazaro of Ream Lazaro Safety Consulting LLC, to help produce and deliver a comprehensive de-escalation training video that is also included in our onboarding training of new and returning employees. Parsons Communications Group's, Bill Parsons, has also provided in-person de-escalation and conflict management training for frontline employees.

Active Shooter Training
In an active shooter situation, the U.S. Department of Homeland Security recommends the following:

- Be aware of your surroundings and any possible dangers
- Take note of the two nearest exits in any facility you visit
- If you are in an office, stay there and secure the door
- If you are in a hallway, get into a room and secure the door
- As a last resort, attempt to take the active shooter down. When the shooter is at close reange and you cannot flee, your chance of survival is much greater if you try to incapacitate him/her
- Call 911 when it is safe to do so

"Run," "Hide," and "Fight" are the actions that both the Federal Bureau of Investigation and U.S. Department of Homeland Security recommend in an active shooter situation and these steps are included in our internal active shooter training.

Training Documentation
Training documentation is a source of hazard identification.

Training documentation provides formal proof that employees were trained and shows that employees received timely certification and recertification in critical skill areas. Up-to-date training documentation also assists us in forecasting future training schedules.

WeGo Public Transit training documentation includes:

- records of training needs analysis for lesson plan development;
- curricula for initial and refresher training;
- training schedules and records of all completed training;
- procedures for revising training materials;
- course assessment materials, and;
- copies of individual employee training records.

WeGo Public Transit records of course completion include:

- dates the training was held;
- content covered during training sessions;
- length of the sessions;
- training format, and;
- signatures of instructor and trainee.

The Director or Training maintains records of training documentation and course completions within the TrainCaster software program.

The Access Ride Manager periodically monitors the demand response taxi contractor records of completion of employee skill and SMS training. Monitoring activities are documented and kept on file in the Access Ride Manager's office.

Training Monitoring

Monitoring our skill training helps us identify hazards, such as training gaps or outdated lesson plans.

WeGo Public Transit regularly monitors its training to ensure effectiveness. Specifically, the training monitoring process includes the following:

- monitoring training to make sure it delivers the necessary safety skills and SMS information
- establishing a process for reviewing and revising training courses while considering review frequency, reviewers, and decision-making process for revisions.

Safety and Security Communication

The CSSO is ultimately responsible for ensuring the distribution and communication of safety and safety performance information throughout WeGo Public Transit. Safety staff and managers of all organizational functions assist the CSSO in this responsibility.

Safety communication provides a foundation to build SMS processes and activities. We ensure that all of our employees are aware of information relevant to their safety-related roles and responsibilities. This information includes explanations of changes to policies, activities, or procedures.

We documented our overall approach to safety communication and supporting safety communication activities. This overall approach to safety communication is on file in the CSSO's office.

In general, our documentation of safety communication includes details about:

- objectives of the communication;
- content;
- target audience;
- format;
- frequency of the communication, and;
- ways to ensure communication was understood.

The Access Ride Manager ensures the demand response taxi contractor has a methodology for overall safety communication.

Safety Meetings
An effective employee safety meeting process provides a strong platform for safety-related communication and dialogue and identification of safety issues, concerns, and conditions. We use a combination of mandatory operations safety meetings and voluntary operations “rap” sessions. The Safety staff maintains documentation of the safety meetings.

We also hold periodic and mandatory vehicle maintenance safety meetings and daily toolbox talks at the beginning of every shift to communicate with maintenance staff on safety-related issues. The Safety staff maintains documentation of the safety meetings.

Organization-Wide Communication of Safety Hazard and Safety Risk Information
A goal of our safety risk management processes is to reduce safety risk for employees and customers. Safety-sensitive employees are always vulnerable to the consequences of safety hazards within the transit environment. Timely reporting to employees of newly identified safety hazards and the safety risks those hazards present can help reduce that vulnerability.

We documented our procedures for communicating hazards. The documentation of these procedures is on file in the CSSO’s office. The CSSO is responsible for making sure this communication takes place.

Communication about Safety Risk Mitigations
We are committed to informing employees at every level of operations about the safety risk mitigations we are putting into effect. We provide this information because:

- it tells employees that the transit agency is doing all it can to reduce risk;
- it brings attention to employee roles and responsibilities that may be affected by new mitigations, and;
- informed employees are better situated to be a source of information on determining how well mitigations are working.

We documented our procedures for communicating safety risk mitigations to employees, along with who is responsible for making sure this communication takes place. This documentation is on file in the CSSO’s office. Safety Staff are responsible for making sure that this communication takes place.

Organization-Wide Communication of Agency Safety Performance
We implement SMS to help us continuously improve our safety performance. Communicating agency safety performance information promotes employee "buy-in" to SMS processes, thus further improving our overall safety performance.

Our employees should have ownership of safety. To reinforce this ownership, we periodically communicate statistics on our overall safety performance to all employees, regardless of job function. This includes providing information on our status related to achieving our safety performance targets.

We document how we communicate safety performance information throughout our organization and to contractors. This documentation is on file in the CSSO's office. The Accountable Executive, supported by the CSSO, is responsible for taking the lead on this communication and making sure that it takes place.

Additional Information

We will maintain documents that describe the programs, policies, and procedures we use to carry out our Agency Safety Plan. We will also maintain documents not included or referenced elsewhere in this safety plan that are related to the implementation of our SMS, as well as results from our SMS processes and activities.

These documents will be maintained for at least three years after their creation and made available upon request by the FTA, other federal entities, or TDOT. The CSSO will be a primary point of contact when providing Agency Safety Plan-related information to external agencies to ensure access to these documents.

Appendix A - Definitions

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. 5329(d), and the agency's Transit Asset Management 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 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 any Accident, Incident, or Occurrence. (see also “safety event”)

Fatality a death or suicide confirmed within 30 days of a reported event. Does not include deaths in or on transit property that are a result of illness or other natural causes.

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 an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

Injury any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene.

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(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 transit agency that is required by 49 U.S.C. 5329 and this part.

Reportable Event a safety or security event occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a maintenance facility, during a transit related maintenance activity, or involving a transit revenue vehicle.

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 transit agency's Safety Management System that functions 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 Event - A collision, derailment, fire, hazardous material spill, act of nature (Act of God), evacuation, or other safety occurrence not otherwise classified occurring on transit right-of-way, resulting in injury requiring transport away from the scene for medical attention for one or more persons or an estimated property damage equaling to or exceeding $25,000.

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 (SMS) 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 Management System (SMS) Executive means a Chief Safety Officer or an equivalent.

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 transit agency's public transportation system.

System Reliability miles between major mechanical failures that prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns.

Safety risk assessment (SRA) means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management means a process within a transit agency'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.

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, 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.

Appendix B: Acronyms

Acronym or Abbreviation	Meaning
ADA	Americans with Disabilities Act
ASP	Agency Safety Plan
CEO	Chief Executive Officer
CFR	Code of Federal Regulations
CSSO	Chief Safety and Security Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
MTA	Metropolitan Transit Authority
PTASP	Public Transportation Agency Safety Plan
SMPS	Safety Management Policy Statement
SMS	Safety Management System
SRM	Safety Risk Management
TDOT	Tennessee Department of Transportation

Appendix C: DTO Safety Committee ASP Approval

Davidson Transit Organization
Employment unit of WeGo Public Transit

430 Myatt Drive
Nashville, TN 37115
615-862-5950
WeGoTransit.com

SAFETY COMMITTEE - MINUTES

Location:	Kodiak Conference Room – Nestor
Date:	February 12, 2025
Time:	10:10 AM

Safety Committee Members in Attendance: Stanley Cunningham, Jason Cunningham, Paul Meyers, Dennise Marshall, Justin Marks, Bobby Irvine, Robert Johnson, Anthony Jones, Angel Martin, Nick Oldham, Duane Robinson and Richard Roberts alternates for Patrick Hester and D'Nese Nicolosi

Additional Meeting Attendees: Andy Burke, Michael Moore, Alvin Barcous, Quen Keys, K. Joy Shelton, Stephanie Beckwith

Introductions: Bobby Irvine and Nick Oldham – Special Called meeting

Nick Oldham, Chief Safety & Security Officer, discussed the findings in the (NTD) National Transit Database for 2024. Performance has improved based on projected goals and actual targets. Maintenance performed very well. The Access Ride Vans needs improvement regarding safety events/injuries. Oldham suggested this finding is an anomaly. Additional comments were made on opportunities for improvement related to vans being on fixed routes, as they are currently categorized by vehicle, no matter the route. Oldham says he will argue to the FTA that fixed-route vans should be classified under buses. Also, an accident for NTD reporting occurs when a person is transported to the hospital via ambulance, including passengers. At our next meeting, we will discuss ways to keep vans off fixed routes and decrease bus accidents (Access and Bus) throughout the year.

Motion by Nick Oldham: Move to accept the agreed-upon projections to be included in the 2025 Safety Plan. Second by: Richard Roberts

Motion: Approved

Meeting adjourned: 11:20 AM

Meeting minutes prepared by Angel Martin

WeGo Public Transit

Appendix D: MTA Board Approval of ASP

Nashville Metropolitan Transit Authority

of Nashville & Davidson County, Tennessee

Board Action Item

Item Number:	M-A-25-007	Meeting Date:	2/27/2025
Item Title:	Safety Plan Amendments		

BACKGROUND:

Under the Federal Transit Administration's (FTA) Public Transportation Agency Safety Plan (PTASP) Final Rule, this agency is required to update its Agency Safety Plan, which implements our Safety Management System yearly. The plan must include safety performance targets that will be voluntarily shared with the Metropolitan Planning Organization (MPO) and the local Department of Transportation. This year's projected performance targets are:

Safety Performance Targets as Reported to the National Transit Database (NTD)

The targets listed below are based on reviews of MTA dba WeGo Public Transit's safety performance data for the previous five years.

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 / failures)
Fixed Route Bus	0	0	38	.52	34	.47	6,800
Demand Response Bus	0	0	10	.58	10	.58	20,000
Demand Response Taxi	0	0	0	0	0	0	0

These targets were formulated and agreed upon by Union and management members who are part of the joint labor-management Safety Committee after viewing last year's data, normalizing it, and making data-driven projections as to how the agency will perform against the previous year's actual performance.

The joint labor-management Safety Committee has approved this updated safety plan that includes the updated Bipartisan Infrastructure Law requirements. The Agency Safety Plan sets a framework to support and complement the existing approach to public transportation safety, identifies deficiencies, and promotes improvements in transit safety performance. The plan sets a proactive approach to safety risk management that is outcome-focused and emphasizes an overall improved safety culture and copies can be made available upon request. Once Board approval is given, the entire plan will be posted on the Agency website for public inspection.

RECOMMENDATION:

Staff requests the Board give the Chief Executive Officer the authority to execute the Agency Safety Plan to comply with FTA's Public Transportation Agency Safety Plan Final Rule and the updated Bipartisan Infrastructure Law requirements.

APPROVED:

Board Secretary

22

2/27/2025

Date

Appendix E: Certification

Appendix F: Risk Assessment Matrix

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	
"Tolerability" based on identified severity and likelihood.	
	Unacceptable under the existing circumstances.
	Acceptable based upon mitigations.
	Acceptable with senior management approval.

Appendix G: Safety Culture Policy

Purpose:

This policy identifies the WeGo philosophy and process required to establish and maintain an appropriate safety/just culture that supports our SMS through proactive risk identification and event management considering human factors and a balanced guiding principle on employee disposition following an event.

General Safety Culture Policy:

WeGo is committed to creating and sustaining a safety culture environment that supports our SMS and recognizes that a number of principles enable the development and sustainment of a positive safety culture including:

- Recognition that fair and equitable treatment of all employees encourages sharing of safety-related information
- Creating and sustaining an environment that actively seeks out risks and supports hazard and event reporting, to include near misses
- Recognition that inappropriate disciplinary measures can suppress open reporting of risks
- Creating and sustaining an environment where there is an understanding that human errors will occur
- Creating and sustaining an environment that promotes openness and learning from events

At WeGo, there is an expectation that all employees actively promote safety in everything they do. This includes two explicit duties that are the responsibility of all employees:

- To report any hazard, near-miss, unsafe condition or incident that occurs, or is otherwise known about
- To openly participate in any investigation that may arise as a result of any reported hazard, near-miss or event that occurs

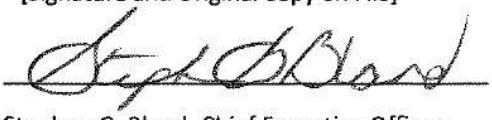
WeGo recognizes that employee actions that contribute to hazards and events may be the result of a wide spectrum of behaviors. These include unintentional error, engaging in at-risk behavior (i.e., moving away from desired behavior, not recognizing risks involved or reckless behavior (i.e., an unacceptable choice that knowingly puts an employee, customer or product in harm's way).

The WeGo policy regarding these behaviors is as follows:

- Unintentional error will be investigated and feedback given
- At-Risk behavior will usually warrant a verbal or written record of first counseling
- Reckless behavior (and some circumstances of at-risk behavior) will usually warrant more significant positive counseling/corrective action steps to be taken

We are committed to creating an open and fair safety culture with WeGo that supports our SMS. As we implement this policy, we pledge that our first response to any event will be to investigate fairly the circumstances involved.

[Signature and Original Copy on File]



Stephen G. Bland, Chief Executive Officer

_____

Date

Appendix F: WeGo Public Transit Organization Chart

July 2025 Organization Chart