

The Grand Connection Public Transportation Agency Safety Plan

Version 1

Adopted February 4, 2025
In compliance with 49 CFR Part 673

Developed in conjunction with the Texas Department of Transportation

Agency Safety Plan



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1. EXECUTIVE SUMMARY

Moving Ahead for Progress in the 21st Century (MAP-21) granted the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive framework to oversee the safety of public transportation throughout the United States. MAP-21 expanded the regulatory authority of FTA to oversee safety, providing an opportunity to assist transit agencies in moving towards a more holistic, performance-based approach to Safety Management Systems (SMS). This authority was continued through the Fixing America's Surface Transportation Act (FAST Act).

In compliance with MAP-21 and the FAST Act, FTA promulgated a Public Transportation Safety Program on August 11, 2016 that adopted SMS as the foundation for developing and implementing a Safety Program. FTA is committed to developing, implementing, and consistently improving strategies and processes to ensure that transit achieves the highest practicable level of safety. SMS helps organizations improve upon their safety performance by supporting the institutionalization of beliefs, practices, and procedures for identifying, mitigating, and monitoring safety risks.

There are several components of the national safety program, including the National Public Transportation Safety Plan (NSP), that FTA published to provide guidance on managing safety risks and safety hazards. The Transit Asset Management (TAM) Plan is one component, which was developed and implemented across the industry in 2018. The subject of this document is the Public Transportation Agency Safety Plan (PTASP) rule, 49 CFR Part 673, and guidance provided by FTA.

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. At Grand Connection, all levels of management, administration and operations are responsible for the safety of their clientele and themselves. To improve public transportation safety to the highest practicable level in the State of Texas and comply with FTA requirements, the Texas Department of Transportation (TxDOT) has developed this Agency Safety Plan (ASP) in collaboration with the City of Grand Prairie and The Grand Connection (Grand Connection).

To ensure that the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the NSP, the Grand Prairie City Council and Grand Connection adopt this ASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP), per 49 U.S.C. 5329(d)(1)(A).¹ While safety has always been a primary function at Grand Connection, this document lays out a process to fully implement an SMS over the next several years that complies with the PTASP final rule.

¹ Federal Register, Vol. 81, No. 24

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A. Plan Adoption - 673.11(a)(1)

This Public Transit Agency Safety Plan is hereby adopted, certified as compliant, and signed by:

William Hills, City Manager

ACCOUNTABLE EXECUTIVE SIGNATURE

DATE

Since Grand Connection is considered a division of the City of Grand Prairie, the main governing body is the Grand Prairie City Council. Approval of this plan by the Grand Prairie City Council occurred on February 4, 2025 and is documented in [RESOLUTION] from the City Council Meeting.

B. Certification of Compliance – 673.13(a)(b)

TxDOT certifies on [DATE] that this Agency Safety Plan is in full compliance with 49 CFR Part 673 and has been adopted and will be implemented by Grand Connection as evidenced by the plan adoption signature and necessary City Council approvals under Section 1.A of this plan.



2. TRANSIT AGENCY INFORMATION - 673.23(D)

Grand Connection is the public transportation provider for the City of Grand Prairie, Texas. The Grand Connection's main office is located just off Highway 161 at 1821 S.Highway !61 Grand Prairie, Texas 75051.

Grand Connection currently operates demand response service for adults over the age of 60 years old or who have some form of a disability, with service spanning from 4:30 am to 5:00 pm, Monday through Friday.

Grand Connection is considered a department of the City of Grand Prairie. The agency is managed by the Transportation Director and Transit Manager.

No additional transit service is provided by Grand Connection on behalf of another transit agency or entity at the time of the development of this plan.

Table 1 contains agency information, while an organizational chart for Grand Connection is provided in Figure 1.

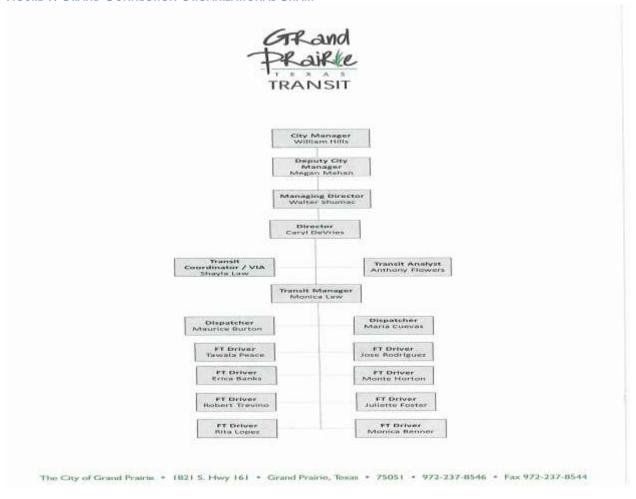
TABLE 1: AGENCY INFORMATION

Information Type	Information
Full Transit Agency Name	Grand Connection
Transit Agency Address	1821 S. State Highway 161, Grand Prairie, TX 75051
Name and Title of Accountable Executive 673.23(d)(1)	William Hills, City Manager
Name of Chief Safety Officer or SMS Executive 673.23(d)(2)	Monica Law, Transit Manager
Key Staff	Monica Law
Mode(s) of Service Covered by This Plan 673.11(b)	Demand Response
List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5310
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Demand Response
Number of Vehicles Operated	12

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FIGURE 1: GRAND CONNECTION ORGANIZATIONAL CHART



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A. Authorities & Responsibilities – 673.23(d)

As stated in 49 CFR Part 673.23(d), Grand Connection is establishing the necessary authority, accountabilities, and responsibilities for the management of safety amongst the key individuals within the organization, as those individuals relate to the development and management of our SMS. In general, the following defines the authority and responsibilities associated with our organization.

The **Accountable Executive** has ultimate responsibility for carrying out the SMS of our public transportation agency, and control or direction over the human and capital resources needed to develop and maintain both the ASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan, in accordance with 49 U.S.C. 5326. The Accountable Executive has authority and responsibility to address substandard performance in the Grand Connection SMS, per 49 CFR Part 673.23(d)(1).

The **Agency leadership and executive management** are those members of our agency leadership or executive management, other than the Accountable Executive, Chief Safety Officer (CSO)/SMS Executive, who have authority or responsibility for day-to-day implementation and operation of our agency's SMS.

The **CSO** is an adequately trained individual who has the authority and responsibility as designated by the Accountable Executive for the day-to-day implementation and operation of the Grand Connection SMS. As such, the CSO is able to report directly to our transit agency's Accountable Executive.

Key staff are staff, groups of staff, or committees to support the Accountable Executive, CSO, or SMS Executive in developing, implementing, and operating our agency's SMS.

Front line employees perform the daily tasks and activities where hazards can be readily identified so the identified hazards can be addressed before the hazards become adverse events. These employees are critical to SMS success through each employee's respective role in reporting safety hazards, which is where an effective SMS and a positive safety culture begins.

Over the next year, Grand Connection will be reviewing and modifying, if necessary, its current job descriptions to ensure the job descriptions comply with 49 CFR Part 673.



3. SAFETY POLICIES AND PROCEDURES

A. Policy Statement - 673.23(a)

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

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

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

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

We have established Safety Performance Targets (SPT) to help us measure the overall effectiveness of our processes and ensure we meet our safety objectives. We will issue quarterly reports to the entire organization documenting how well we met our SPTs and describing the safety risk mitigations we implemented to reduce safety risk.

I. Employee Safety Reporting Program – 673.23(b)

An effective SMS uses information from a variety of sources. A major source of safety data and information is frontline employees. These employees are typically the first to spot unsafe conditions that arise from unplanned conditions either on the vehicles, in the maintenance shop, or in the field during operations. One major tenet of the PTASP Rule is the Employee Safety Reporting Program (ESRP). Under this rule, agencies must establish and implement a process that allows employees to report safety conditions directly to senior management; provides protections for employees who report safety conditions to senior management; and includes a description of employee behaviors that may result in disciplinary action.

As contained in Section "Employee Relations" of the City of Grand Prairie's Employee Handbook (Appendix A, Table 7, shows the document name, file name, and date of adoption), the City has an open communication policy that allows for communication of complaint, question, or suggestion for improvement. This process requires the employee to first approach their respective immediate supervisor. If the matter cannot be resolved with the immediate supervisor, the employee has the option to speak to the Human Resources Officer or the City Manager. Grand Connection employees are



protected from retaliation for communicating complaints or concerns in good faith and Grand Connection maintains the confidentiality of the employee making the complaint.

Over the next year, Grand Connection will review and modify, if necessary, its *Employee Relations* policy in the *Employee Handbook*, to develop it into a full ESRP to ensure that the policy complies with 49 CFR Part 673.

In general, the Grand Connection ESRP will ensure that all employees are encouraged to report safety conditions directly to senior management or their direct supervisor for elevation to senior management. The policy will include any contract employees. The policy will also spell out what protections are afforded employees who report safety related conditions and will describe employee behaviors that are not covered by those protections. In addition, the policy will elaborate on how safety conditions that are reported will be reported back to the initiator(s) – either to the individual or groups of individuals or organization, dependent on the nature of the safety condition.

To bolster the information received from frontline employees, Grand Connection will also review our current policy for how our agency receives information and safety related data from employees and customers. If necessary, Grand Connection will develop additional means for receiving, investigating and reporting the results from investigations back to the initiator – either to the person, groups of persons, or distributed agency-wide to ensure that future reporting is encouraged.

II. Communicating the Policy Throughout the Agency - 673.23(c)

Grand Connection is committed to ensuring the safety of its clientele, personnel and operations. Part of that commitment is developing an SMS and agencywide safety culture that reduces agency risk to the lowest level possible. The first step in developing a full SMS and agencywide safety culture is communicating our SMP throughout our agency.

The SMP and safety objectives are at the forefront of all communications. This communication strategy will include posting the policy in prominent work locations for existing employees and adding the policy statement to the on-boarding material for all new employees. In addition, the policy statement will become part of our agency's regular safety meetings and other safety communications efforts. The policy will be signed by the Accountable Executive so that all employees know that the policy is supported by management.

B. PTASP Development and Coordination with TxDOT – 673.11(d)

This PTASP has been developed by TxDOT on behalf of North Central Texas Council of Governments (NCTCOG), the Metropolitan Planning Organization (MPO) for the metro area, and Grand Connection Transit/City of Grand Prairie in accordance with all requirements stated in 49 CFR Part 673 applicable to a small public transportation provider. TxDOT mailed a formal call for participation in a State sponsored PTASP development process to all Texas Section 5307 small bus transit agencies on January 15, 2019 and followed that call with a series of phone calls and additional documentation. Grand Connection

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provided a letter to TxDOT opting into participation on March 15, 2019 and has been an active participant in the development of this plan through sharing existing documentation and participating in communication and coordination throughout the development of this plan. The Grand Connection documentation used in the development of this plan is shown in Error! Reference source not found. A ppendix A.

In support of tracking performance on our SA and SP processes, Grand Connection conducts a yearly safety culture survey. This survey is intended to help Grand Connection assess how well we communicate safety and safety performance information throughout our organization by gauging how safety is perceived and embraced by Grand Connection's administrators, supervisors, staff and contractors. The survey is designed to help us assess how well we are conveying information on hazards and safety risks relevant to employees' roles and responsibilities and informing employees of safety actions taken in response to reports submitted through our ESRP. Results from our most recent survey were analyzed and incorporated into the implementation strategies contained in this ASP.

Once the documents were reviewed, an on-site interview was conducted with Grand Connection to gain a better understanding of the agency and its personnel. This understanding was necessary to ensure that the ASP was developed to fit Grand Connection's size, operational characteristics, and capabilities.

The draft ASP was delivered to Grand Connection in March 2020 for review and comment. Once review was completed and any adjustments were made, the final was delivered to Grand Connection for review and adoption.

C. PTASP Annual Review - 673.11(a)(5)

Per 49 U.S.C. 5329(d)(1)(D), this plan includes provisions for annual updates of the SMS. As part of Grand Connection's ongoing commitment to fully implementing SMS and engaging our agency employees in developing a robust safety culture, Grand Connection will review the ASP and all supporting documentation annually. The review will be conducted as a precursor to certifying to FTA that the ASP is fully compliant with 49 CFR Part 673 and accurately reflects the agency's current implementation status. Certification will be done through Grand Connection's annual Certifications and Assurances reporting to FTA.

The annual review will include the ASP and supporting documents (Standard Operating Procedures [SOP], Policies, Manuals, etc.) that are used to fully implement all the processes used to manage safety at Grand Connection. All changes will be noted (as discussed below) and the Accountable Executive will sign and date the title page of this document and provide documentation of approval by the Grand Prairie City Council whether by signature or by reference to resolution.

The annual ASP review will follow the update activities and schedule provided below in Table 2. As processes are changed to fully implement SMS or new processes are developed, Grand Connection will track those changes for use in the annual review.

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TABLE 2: ASP ANNUAL UPDATE TIMELINE

Task	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept
Review Agency Operations								
Review SMS Documentation								
 Safety Policy; 								
Risk Management;								
Safety Assurance; and								
 Safety Promotion. 								
Review Previous Targets and Set or Continue Targets								
Report Targets to National Transit Database (NTD),								
TxDOT, NCTCOG								
Make Any Necessary Adjustments to PTASP								
Update Version #, Adopt & Certify Plan Compliance								*

The following table, Table 3, will be used to record final changes made to the ASP during the annual update. This table will be a permanent record of the changes to the ASP over time.

TABLE 3: ASP RECORD OF CHANGES

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Header	Text	Text	Text	Text
Header	Text	Text	Text	Text
Header	Text	Text	Text	Text

The implementation of SMS is an ongoing and iterative process, and as such this PTASP is a working document. Therefore, a clear record of changes and adjustments is kept in the PTASP for the benefit of safety plan performance management and to comply with Federal statutes.

D. PTASP Maintenance - 673.11(a)(2)(c)

Grand Connection will follow the annual review process outlined above and adjust this ASP as necessary to accurately reflect current implementation status. This plan will document the processes and activities related to SMS implementation as required under 49 CFR Part 673 Subpart C and will make necessary updates to this ASP as Grand Connection continues to develop and refine its SMS implementation.

E. PTASP Documentation and Recordkeeping - 673.31

At all times, Grand Connection will maintain documents that set forth its ASP, including those documents related to the implementation of Grand Connection's SMS and those documents related to the results from SMS processes and activities. Grand Connection will also maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that our agency uses to carry out its ASP and all iterations of those documents. These documents will be made available



upon request to the FTA or other Federal entity, or the TxDOT. Grand Connection will maintain these documents for a minimum of three years after the documents are created. These additional supporting documents are cataloged in Appendix A and the list will be kept current as a part of the annual ASP review and update.

F. Safety Performance Measures 673.11(a)(3)

The PTASP Final Rule, 49 CFR Part 673.11(a)(3), requires that all public transportation providers must develop an ASP to include SPTs based on the safety performance measures established under the NSP. The safety performance measures outlined in the NSP were developed to ensure that the measures can be applied to all modes of public transportation and are based on data currently being submitted to the NTD. The safety performance measures included in the NSP are fatalities, injuries, safety events, and system reliability (State of Good Repair as developed and tracked in the TAM Plan).

There are seven (7) SPTs that must be included in each ASP that are based on the four (4) performance measures in the NSP. These SPTs are presented in terms of total numbers reported and rate per Vehicle Revenue Mile (VRM). Each of the seven (7) is required to be reported by mode as shown in Table 4:

TABLE 4: NSP SAFETY PERFORMANCE MEASURES

Safety Performance Measure	SPT	SPT	
Fatalities	Total Number Reported	Rate Per Total VRM	
Injuries	Total Number Reported	Rate Per Total VRM	
Safety Events	Total Number Reported	Rate Per Total VRM	
System Reliability	Mean distance between major mechanical failure		

Table 5 presents baseline numbers for each of the safety performance measures. Grand Connection collected the past five (5) years of reported data to develop the rolling averages listed in the table.

 TABLE 5: BASELINE 2024 SAFETY PERFORMANCE MEASURES

Mode	Fatalities	Rate of Fatalities*	Injuries	Rate of Injuries*	Safety Events	Rate of Safety Events*	Mean Distance Between Major Mechanical Failure
Demand Response	0	0	0	0.00000000	1	0	11,603

^{*}rate = total number for the year/total revenue vehicle miles traveled

While safety has always been a major component of the Grand Connection operation, the adoption of this ASP will result in changes across all aspects of the organization. The SPTs set in Table 6 reflect an acknowledgment that SMS implementation will produce new information that will be needed to accurately set meaningful SPTs. We will set our targets at the current NTD reported 5-year average as we begin the process of fully implementing our SMS and developing our targeted safety improvements. This will ensure that we do no worse than our baseline performance over the last five years.

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TABLE 6: DEMAND RESPONSE SAFETY PERFORMANCE TARGETS

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities*	0	0
Injuries	0	0
Rate of Injuries*	0	0
Safety Events	0	0
Rate of Safety Events*	0	0
System Reliability	0	0
Other	N/A	N/A

^{*}rate = total number for the year/total revenue vehicle miles traveled

As part of the annual review of the ASP, Grand Connection will reevaluate its SPTs and determine whether the SPTs need to be refined. As more data is collected as part of the SRM process discussed later in this plan, Grand Connection may begin developing safety performance indicators to help inform management on safety related investments.

G. Safety Performance Target Coordination 673.15(a)(b)

Grand Connection will make its SPTs available to TxDOT and the NCTCOG to aid in those agencies' respective regional and long-range planning processes. To the maximum extent practicable, Grand Connection will coordinate with TxDOT and NCTCOG in the selection of State and MPO SPTs as documented in the Interagency Memorandum of Understanding (MOU).

Each year during the FTA Certifications and Assurances reporting process, Grand Connection will transmit any updates to its SPTs to both NCTCOG and TxDOT (unless those agencies specify another time in writing).



4. SAFETY MANAGEMENT SYSTEMS - 673 SUBPART C

As noted earlier, FTA has adopted SMS as the basis for improving safety across the public transportation industry. In compliance with the National Safety Program, National Public Transportation Safety Plan, and 49 CFR Part 673, Grand Connection is adopting SMS as the basis for directing and managing safety and risk at our agency. Grand Connection has always viewed safety as a core business function. All levels of management and employees are accountable for appropriately identifying and effectively managing risk in all activities and operations in order to deliver improvements in safety and reduce risk to the lowest practical level during service delivery.

As noted in the graphic below, SMS is comprised of four basic components - SMP, SRM, SA, and SP. The SMP and SP are the enablers that provide structure and supporting activities that make SRM and SA possible and sustainable. The SRM and SA are the processes and activities for effectively managing safety as shown in Figure 2.

FIGURE 2: SAFETY MANAGEMENT SYSTEMS



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Implementing SMS at Grand Connection will be a major undertaking over the next several years. This ASP is the first step to putting in place a systematic approach to managing the agency's risk. Grand Connection has already taken several steps to implement SMS, such as developing this initial ASP and designating a CSO. During the first year of implementation, Grand Connection will identify SMS roles and responsibilities and key stakeholder groups, identify key staff to support implementation, and ensure the identified staff receive SMS training. Grand Connection will also develop a plan for implementing SMS, inform stakeholders about the ASP, and discuss our progress toward implementation with the Grand Prairie City Council and our agency's planning partners.

A. Safety Risk Management - 673.25

Through the adoption of this ASP, Grand Connection is establishing the SRM process shown in Figure 3 for identifying hazards and analyzing, assessing and mitigating safety risk in compliance with the requirements of 49 CFR Part 673.25. The SRM processes described in this section are designed to implement the Grand Connection SMS.

FIGURE 3: SAFETY RISK MANAGEMENT PROCESS

Safety Hazard Safety Risk Assessment Safety Risk Mitigation

The implementation of the SRM component of the SMS will be carried out over the course of the next year. The SRM components will be implemented through a program of improvement during which the SRM processes will be implemented, reviewed, evaluated and revised, as necessary, to ensure the processes are achieving the intended safety objectives as the processes are fully incorporated into Grand Connection's SOPs.

The SRM is focused on implementing and improving actionable strategies that Grand Connection has undertaken to identify, assess and mitigate risk. One of the tools being used in that process is the creation of a Risk Register that serves as an accessible resource for documenting the SRM process, tracking the identified risks, and documenting the effectiveness of mitigation strategies in meeting defined safety objectives and performance measures. The draft Risk Register is shown in Figure 4.



FIGURE 4: DRAFT RISK REGISTER

Hazard	Туре	Likelihood	Consequence	Resolution
What is wr	rong?	What could happ	pen	What could mitigate this?

As the SRM process progresses through the steps of identifying what may be wrong, what could happen as a result, and what steps Grand Connection is taking to resolve the risk and mitigate the hazard, the CSO completes and publishes the various components of the Risk Register. These components include the use of safety hazard identification, safety risk assessment, and safety risk mitigation, as described in the following sections.

I. Safety Hazard Identification – 673.25(b)

The Grand Connection SRM process is a forward-looking effort to identify safety hazards that could potentially result in negative safety outcomes. Within the SRM process, a hazard is any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infra-structure of a public transportation system; or damage to the environment.

Hazard identification focuses on out-of-the-norm conditions that need special attention or immediate action, new procedures, or training to resolve a condition that is unacceptable and return conditions to an acceptable level. Grand Connection uses a variety of mechanisms for identifying and documenting hazards, namely:

- Through training and reporting procedures Grand Connection ensures employees can identify
 hazards and that each employee clearly understands that the employee has a responsibility to
 immediately report any safety hazards identified to the employee's supervisors. Continued
 training helps employees to improve the skills needed to identify hazards.
- Employee hazard training coupled with the ESRP ensures that Grand Connection has full use of information from frontline employees for hazard identification.



- Upon receiving the hazard report, supervisors communicate the identified hazard to the CSO for entry into the risk register for risk assessment, classification and possible mitigation.
- In carrying out the risk assessment, the CSO uses standard reporting forms (e.g. *Pre-and Post-trip Inspection Forms* and *Vehicle Exterior Damage Charts* to mitigate mechanical based safety hazards that are identified) and other reports completed on a routine basis by administrative, operations and maintenance. The Grand Connection *Bus Operator Training* (Appendix A) contains procedures for flagging and reporting hazards as a part of day-to-day operations.
- Supervisors in particular are responsible for performing and documenting regular safety assessments, which include reporting and recommending methods to reduce identified hazards.
- Grand Connection uses incident reports and records to determine specific areas of training that need to be covered with employees to ensure safety hazard identification is continually improved, and thus ensure that hazards are identified before an event recurrence.
- Incident reports are also analyzed by the risk management team to identify any recurring patterns or themes that would help to identify underlying hazards and root causes of the event that can be mitigated to prevent recurrence.
- If a hazard is such that an employee would be reluctant to report the information due to perceived negative consequences (e.g. disciplinary action), alternative, anonymous reporting mechanisms are available through an anonymous email system.
- To increase the safety knowledge of our agency, the CSO is encouraged to participate in available professional development activities and peer-to-peer exchanges as a source of expertise and information on lessons learned and best practices in hazard identification.
- Other sources for hazard identification include:
 - o ESRP
 - Inspections of personnel job performance, vehicles, facilities and other data
 - Investigations of safety events
 - Safety trend analysis on data currently collected
 - Training and evaluation records
 - Internal safety audits
 - External sources of hazard information could include:
 - FTA and other federal or state authorities
 - Reports from the public
 - Safety bulletins from manufacturers or industry associations

In addition to identifying the hazard, the hazard identification process also classifies the hazard by type (organizational, technical or environmental) to assist the CSO in identifying the optimal combination of

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departmental leadership and subject matter expertise to select in assembling the safety risk assessment team.

The various hazard types can also be categorized by subcategory for each type. For example, organizational hazards can be subcategorized into resourcing, procedural, training or supervisory hazards. Each of the subcategories implies different types of mitigation strategies and potentially affect overall agency resources through varying costs for implementation. Technical hazards can be subcategorized into operational, maintenance, design and equipment. Additionally, environmental hazards can be subcategorized into weather and natural, which is always a factor for every operation.

II. Safety Risk Assessment – 673.25(c)

As part of the new SRM process, Grand Connection has developed methods to assess the likelihood and severity of the consequences of identified hazards, and prioritizes the hazards based on the safety risk. The process continues the use of the Risk Register described in the previous section to address the next two components.

To accurately assess a risk, Grand Connection may need to perform an investigation. Grand Connection currently investigates accidents or crashes but will need to develop a full investigation procedure to inform the SRM process. The investigation procedure will start with the framework found in the *Accident and Injury Review Policy* (Policy No. 5) (Appendix A, Table 7, shows the document name, file name, and date of adoption) and will be developed to cover all risk assessment. Once fully developed, the document will become the Investigation SOP. The SOP will include accident investigation procedures as well as risk investigation procedures. These procedures will be used to investigate risks identified from multiple sources including the ESRP.

Safety risk is based on an assessment of the likelihood of a potential consequence and the potential severity of the consequences in terms of resulting harm or damage. The risk assessment also considers any previous mitigation efforts and the effectiveness of those efforts. The results of the assessment are used to populate the third and fourth components of the Risk Register as shown in Figure 5.

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FIGURE 5: SAFETY RISK ASSESSMENT STEPS IN POPULATING THE RISK REGISTER

Hazard	Туре	Likelihood	Consequence	Resolution

The risk assessment is conducted by the CSO and their risk management team through the Safety Committee supplemented by content specialists from the respective department or section to which the risk applies. The process employs a safety risk matrix, similar to the one shown in Figure 6, that allows the safety team to visualize the assessed likelihood and severity, and to help decision-makers understand when actions are necessary to reduce or mitigate safety risk.

FIGURE 6: SAFETY RISK ASSESSMENT MATRIX

RISK ASSESSMENT MATRIX							
SEVERITY LIKELIHOOD	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)			
Frequent (A)	High	High	High	Medium			
Probable (B)	High	High	Medium	Medium			
Occasional (C)	High	Medium	Medium	Low			
Remote (D)	Medium	Medium	Low	Low			
Improbable (E)	Medium	Low	Low	Low			

Although the current version of the matrix relies heavily on the examples and samples that are listed on the PTASP Technical Assistance Center website, lessons learned from the implementation process during the coming years will be used to customize the matrix that Grand Connection will use to address our unique operating realities and leadership guidance.

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Once a hazard's likelihood and severity have been assessed, the CSO enters the hazard assessment into the Risk Register that is used to document the individual hazard and the type of risk it represents. This information is used to move to the next step, which is hazard mitigation.

The Risk Assessment Matrix is an important tool. If a risk is assessed and falls within one of the red zones, the risk is determined to be unacceptable under existing circumstances. This determination that management must take action to mitigate the situation. This is the point in the process when SRMs are developed. If the risk is assessed and falls within one of the yellow zones, the risk is determined to be acceptable, but monitoring is necessary. If the risk falls within one of the green zones, the risk is acceptable under the existing circumstances.

III. Safety Risk Mitigation – 673.25(d)

Upon completion of the risk assessment, the CSO and the Safety Committee continue populating the Risk Register (Figure 7) by identifying mitigations or strategies necessary to reduce the likelihood and/or severity of the consequences. The goal of this step is to avoid or eliminate the hazard or, when elimination is not likely or feasible, to reduce the assessed risk rating to an acceptable level. However, mitigations do not typically eliminate the risk entirely.

FIGURE 7: RISK REGISTER MITIGATION COMPONENT

Hazard	Туре	Likelihood	Consequence	Resolution	

To accomplish this objective, the CSO, through the risk management team, works with subject matter experts and content specialists from the respective department or section to which the risk applies. The risk management team then conducts a brainstorming exercise to elicit feedback from staff and supervisors with the highest level of expertise in the components of the hazard.

Documented risk resolution and hazard mitigation activities from previous Risk Register entries and the resolution's documented level of success at achieving the desired safety objectives may also be reviewed and considered in the process. If the hazard is external (e.g., roadway construction by an outside agency) information and input from external actors or experts may also be sought to take advantage of all reasonably available resources and avoid any unintended consequences.

Agency Safety Plan



Once a mitigation strategy is selected and adopted, the strategy is assigned to an appropriate staff member or team for implementation. The assigned personnel and the personnel's specific responsibilities are entered into the Risk Register. Among the responsibilities of the mitigation team leader is the documentation of the mitigation effort, including whether the mitigation was carried out as designed and whether the intended safety objectives were achieved. This information is recorded in the appendix to the Risk Register for use in subsequent SA activities and to monitor the effectiveness of the SRM program.

B. Safety Assurance - 673.27 (a)

Safety Assurance means processes within the Grand Connection SMS that function to ensure a) the implementation and effectiveness of safety risk mitigation, and b) Grand Connection meets or exceeds our safety objectives through the collection, measurement, analysis and assessment of information.

SA helps to ensure early identification of potential safety issues. SA also ensures that safeguards are in place and are effective in meeting Grand Connection's critical safety objectives and contribute towards SPTs.

I. Safety Performance Monitoring and Measuring 673.27 (b)

As the first step in the Grand Connection safety assurance program, Grand Connection collects and monitors data on safety performance indicators through a variety of mechanisms described in the following sections. Safety performance indicators are information on safety that can provide early warning signs about safety risks. Grand Connection currently relies primarily on lagging indicators representing negative safety outcomes that should be avoided or mitigated in the future. However, initiatives are underway to adopt a more robust set of leading indicators that monitor conditions that are likely to contribute to negative outcomes in the future. In addition to the day-to-day monitoring and investigation procedures detailed below, Grand Connection will review and document the safety performance monitoring and measuring processes as part of the annual update of this ASP.

MONITORING COMPLIANCE AND SUFFICIENCY OF PROCEDURES 673.27 (B)(1)

Grand Connection monitors our system for personnel compliance with operations and maintenance procedures and also monitors these procedures for sufficiency in meeting safety objectives. A list of documents describing the safety related operations and maintenance procedures cited in this ASP is provided in Appendix A of this document.

Supervisors monitor employee compliance with Grand Connection SOP through direct observation and review of information from internal reporting systems such as the *Customer Comment Cards* (Section "Customer Service" of *The Grand Connection: A Guide to Grand Prairie Transit - Policies and Procedures* (Appendix A)) from customers and the *Employee Relations Policy* for employees provided in the *Employee Handbook*.

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Grand Connection addresses non-compliance with standard procedures for operations and maintenance activities through a variety of actions, including revision to training materials and delivery of employee and supervisor training if the non-compliance is systemic. If the non-compliance is situational, then activities may include supplemental individualized training, coaching, and heightened management oversight, among other remedies.

Sometimes personnel are fully complying with the procedures, but the operations and maintenance procedures are inadequate and pose the risk of negative safety outcomes. In this case, the cognizant person then submits the deficiency or inadequate procedures to the SRM process. Through the SRM process, the SRM team will then evaluate and analyze the potential organizational hazard and assign the identified hazard for mitigation and resolution, if appropriate. The SRM team will also do periodic self-evaluation and mitigation of any identified deficiencies in the SRM process itself.

MONITORING OPERATIONS 673.27(B)(2)

Department Directors are required to monitor investigation reports of safety events and SRM resolution reports to monitor the department's operations to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended. If it is determined that the safety risk mitigation did not bring the risk to an acceptable level or otherwise failed to meet safety objectives, then the supervisor resubmits the safety risk/hazard to the SRM process. The CSO will work with the supervisor and subject matter experts to reanalyze the hazard and consequences and identify additional mitigation or alternative approaches to implementing the mitigation.

II. Safety Event Investigation 673.27(b)(3)

Grand Connection currently conducts investigations of safety events through the Department Safety Committee and the City-wide Safety Committee, dependent on the size of the department. From an SA perspective, the objective of the investigation is to identify causal factors of the event and to identify actionable strategies that Grand Connection can employ to address any identifiable organizational, technical or environmental hazard at the root cause of the safety event. The City of Grand Prairie has an *Accident and Injury Review Policy* (Policy No. 5) (Appendix A) that provides a standardized approach for corrective and disciplinary action used to evaluate employee injuries and accidents across city departments when safety policies, procedures and practices have been violated.

The Safety Committee, consisting of content specialists, evaluates the incident report and other available information to determine the root cause of the accident/event. Primary sources for preserving information for the Safety Committee Investigation are described in Section III: Safety of the *Grand Connection Driver Manual* (DM) provided in the *Bus Operator Training Document* (Appendix A). These primary resources include the Pre-Trip and Pos-Trip Vehicle Inspection Form, the operator's IAR-Incident Accident Report and the results of post-accident drug & alcohol testing (if the incident met the criteria under 49 CFR Part 655). Follow up with driver or other cognizant parties may be necessary to elicit additional information.



The Safety Committee will identify any hazards noted in the incident report and refers those hazards to the SRM process.

Safety Event Investigations that seek beyond superficial circumstances to identify and document the root cause of an accident or other safety event are a critical component of the SA process because they are a primary resource for the collection, measurement, analysis and assessment of information. Grand Connection will examine our procedures and, as needed, incorporate a variety of mechanisms for identifying and documenting root causes of accidents and incidents into our existing procedures.

MONITORING INTERNAL SAFETY REPORTING PROGRAMS 673.27(B)(4)

As a primary part of the internal safety reporting program, our agency monitors information reported through the ESRP. When a report originating through the complaint process documents a safety hazard, the supervisor submits the hazards identified through the internal reporting process, including previous mitigation in place at the time of the safety event. The supervisor submits the hazard report to the SRM process to be analyzed, evaluated, and if appropriate, assigned for mitigation/resolution.

OTHER SAFETY ASSURANCE INITIATIVES

Because leading indicators can be more useful for safety performance monitoring and measurement than lagging indicators, Grand Connection is undertaking efforts to implement processes to identify and monitor more leading indicators or conditions that have the potential to become or contribute to negative safety outcomes. These efforts may include trend analysis of environmental conditions through monitoring National Weather Service data; monitoring trends toward or away from meeting the identified SPTs; or other indicators as appropriate.

C. Safety Promotion - 673.29

Management support is essential to developing and implementing SMS. SP includes all aspects of how, why, when and to whom management communicates safety related topics. SP also includes when and how training is provided. The following sections outline both the safety competencies and training that Grand Connection will implement and how safety related information will be communicated.

I. Safety Competencies and Training – 673.29(a)

Grand Connection provides comprehensive training to all employees regarding each employee's job duties and general responsibilities. This training includes safety responsibilities related to the employee's position. In addition, regular driver safety meetings are held to ensure that safety related information is relayed to the key members of our agency's safety processes.

As part of SMS implementation, Grand Connection will be conducting the following activities:

• Conduct a thorough review of all current general staff categories (administrative, driver, supervisor, mechanic, maintenance, etc.) and the respective staff safety related responsibilities.



- Conduct an assessment of the training requirements spelled out in 49 CFR Part 672 and the
 various courses required for different positions. (Grand Connection is not subject to the
 requirements under 49 CFR Part 672 but will review the training requirements to understand
 what training is being required of other larger agencies in the event these trainings might be
 useful).
- Conduct an assessment of the training material available on the FTA PTASP Technical Assistance Center website.
- Review other training material available from industry sources such as the Community
 Transportation Association of America and the American Public Transportation Association
 websites.
- Develop a set of competencies and trainings required to meet the safety related activities for each general staff category.
- Develop expectations for ongoing safety training and safety meeting attendance.
- Develop a training matrix to track progress on individuals and groups within the organization.
- Adjust job notices associated with general staff categories to ensure that new personnel understand the safety related competencies and training needs and the safety related responsibilities of the job.
- Include refresher training in all trainings and apply it to agency personnel and contractors.

II. Safety Communication – 673.29(b)

Grand Connection regularly communicates safety and safety performance information throughout our agency's organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through the ESRP (noted in Section 3) or other means.

Grand Connection reports any safety related information to the Grand Prairie City Council at their regular meetings and will begin including safety performance information. In addition, Grand Connection holds regularly scheduled meetings with drivers and dispatchers to ensure that any safety related information is passed along that would affect the execution of the drivers' duties. Grand Connection also posts safety related and other pertinent information in a common room for all employees.

Grand Connection will begin systematically collecting, cataloging, and, where appropriate, analyzing and reporting safety and performance information to all staff. To determine what information should be reported, how the information should be reported and to whom, Grand Connection will answer the following questions:

What information does this individual need to do their job?

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- How can we ensure the individual understands what is communicated?
- How can we ensure the individual understands what action must be taken as a result of the information?
- How can we ensure the information is accurate and kept up-to-date?
- Are there any privacy or security concerns to consider when sharing information? If so, what should we do to address these concerns?

In addition, Grand Connection will review its current communications strategies and determine whether others are needed. As part of this effort, Grand Connection has conducted, and will continue to conduct, a Safety Culture Survey to understand how safety is perceived in the workplace and what areas Grand Connection should be addressing to fully implement a safety culture at our agency.



5. APPENDIX A

TABLE 7:PTASP SUPPORTING DOCUMENTS

File Name	Revision Date	Document Name	Document Owner
2023-24 FG Grand Connection 2019 Funding	Presentation	Finance and Government	The Grand
Presentation.pptx	Date:	Committee - PowerPoint	Connection
	8/20/2024	presentation	Funding
D05 Safety Accident and Injury Review	Effective	Human Resources Policies	City of Grand
Policy.pdf	Date:	and Procedures, No 5	Prairie
	7/1/2019	Accident and Injury Review	
		Policy	
D05-Safety Accident and Injury Review		Accident/Injury Review Form	
Form.pdf			
E06 Substance Abuse and Drug Testing 9-26-	9/26/2018	Human Resources Policies	City of Grand
18.pdf		and Procedures, No 6	Prairie
		Substance Abuse and Drug	
		Testing	
E06 Substance Abuse and Drug Testing		Human Resources Policies	
Policy.pdf		and Procedures, No 6	
		Substance Abuse and Drug	
		Testing	-
Employee Handbook.pdf	12/31/2012	Employee Handbook	City of Grand Prairie
Facility Plan.docx		City of Grand Prairie, Facility	City of Grand
		Building Inspection Plan	Prairie
Final Report Triennial Review.pdf	Report Date:	Fiscal Year 2024 Triennial	Tuba Group
	07/23/2024	Review	inc.
Government.docx		No title - brief description of	
		the City (Government)	
GP_Service area.pdf		Grand Connection Service	
		Area Map	
Grand Connection Policies and Procedures		The Grand Connection: A	The Grand
Appdoc		Guide to Grand Prairie	Connection
		Transit - Policies and	
		Procedures	
HR Policy Cover Page and Introduction 12-19-	12/19/2018	Human Resources Policies	City of Grand
18.pdf		and Procedures	Prairie



File Name	Revision Date	Document Name	Document Owner
NCTCOG_GroupTAMPlan_FinalDraft - Copy.docx	9/21/2018	Transit Asset Management Group-Sponsored Plan	North Central Texas Council of Governments (NCTCOG)
Organizational Chart.pdf		Organizational Chart	City of Grand Prairie
Preventive Maintenance Plan.doc		Preventive Maintenance Plan	City of Grand Prairie
Training.pdf	6/28/2014	Job Classification, Bus Operator	City of Grand Prairie
Transportation Org Chart new 2024.ppt	Jan-2024	Transportation Services Organizational Chart	

A. Glossary of Terms

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 transit vehicles; an evacuation for life safety reasons; at any location, at any time, whatever the cause.

Accountable Executive (typically the highest executive in the agency): means a single, identifiable person who has ultimate responsibility for carrying out the SMS of a public transportation agency, 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.

Agency Leadership and Executive Management: means those members of agency leadership or executive management (other than an Accountable Executive, CSO, or SMS Executive) who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.

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

Corrective Maintenance: Specific, unscheduled maintenance typically performed to identify, isolate, and rectify a condition or fault so that the failed asset or asset component can be restored to a safe operational condition within the tolerances or limits established for in-service operations.

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

Event: means an accident, incident, or occurrence.

Federal Transit Administration (FTA): means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

Hazard: means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

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.

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.

Key staff: means a group of staff or committees to support the Accountable Executive, Chief Safety Officer, or SMS Executive in developing, implementing, and operating the agency's SMS.

Major Mechanical Failures: means failures caused by vehicle malfunctions or subpar vehicle condition which requires that the vehicle be pulled from service.

National Public Transportation Safety Plan (NSP): 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).

Passenger: means a person, other than an operator, who is on board, boarding, or alighting from a vehicle on a public transportation system for the purpose of travel.

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).

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Preventative Maintenance: means regular, scheduled, and/or recurring maintenance of assets (equipment and facilities) as required by manufacturer or vendor requirements, typically for the purpose of maintaining assets in satisfactory operating condition. Preventative maintenance is conducted by providing for systematic inspection, detection, and correction of anticipated failures either before they occur or before they develop into major defects. Preventative maintenance is maintenance, including tests, measurements, adjustments, and parts replacement, performed specifically to prevent faults from occurring. The primary goal of preventative maintenance is to avoid or mitigate the consequences of failure of equipment.

Public Transportation Agency Safety Plan (PTASP): means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

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

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

Road Calls: means specific, unscheduled maintenance requiring either the emergency repair or service of a piece of equipment in the field or the towing of the unit to the garage or shop.

Safety Assurance (SA): means the process within a transit agency's SMS that functions to ensure the implementation and effectiveness of safety risk mitigation and ensures that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Management Policy (SMP): means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of the agency's employees in regard to safety.

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

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

Safety Objective: means a general goal or desired outcome related to safety.

Safety Performance: means an organization's safety effectiveness and efficiency, as defined by safety performance indicators and targets, measured against the organization's safety objectives.

Safety Performance Indicator: means a data-driven, quantifiable parameter used for monitoring and assessing safety performance.

Safety 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.

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Safety Performance Monitoring: means activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and SPTs.

Safety Performance Target (SPT): means a quantifiable level of performance or condition, expressed as a value for a given performance measure, achieved over a specified timeframe related to safety management activities.

Safety Promotion (SP): means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

Safety Risk: means the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome.

Safety Risk Assessment: means the formal activity whereby a transit agency determines SRM priorities by establishing the significance or value of its safety risks.

Safety Risk Management (SRM): means a process within a transit agency's Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risk.

Safety Risk Mitigation: means the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards.

Safety Risk Probability: means the likelihood that a consequence might occur, taking as reference the worst foreseeable, but credible, condition.

Safety Risk Severity: means the anticipated effects of a consequence, should the consequence materialize, taking as reference the worst foreseeable, but credible, condition.

Serious Injury: means any injury which:

- Requires hospitalization for more than 48 hours, commencing within seven days from the date that the injury was received;
- Results in a fracture of any bone (except simple fractures of fingers, toes, or nose);
- Causes severe hemorrhages, nerve, muscle, or tendon damage;
- Involves any internal organ; or
- 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.

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State: means a State of the United States, the District of Columbia, or the Territories of 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.

State Safety Oversight Agency: means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.

Transit Agency: means an operator of a public transportation system.

Transit Asset Management (TAM) 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.

Vehicle Revenue Miles (VRM): means the miles that vehicles are scheduled to or actually travel while in revenue service. Vehicle revenue miles include layover/recovery time and exclude deadhead; operator training; vehicle maintenance testing; and school bus and charter services.

B. Additional Acronyms Used

ASP: Agency Safety Plan

City: The City of Grand Prairie, Texas

ESRP: Employee Safety Reporting Program

FAST Act: Fixing America's Surface Transportation Act

Grand Connection: Grand Connection Transit, City of Grand Prairie, Texas

MAP-21: Moving Ahead for Progress in the 21st Century Act

MOU: Memorandum of Understanding

MPO: Metropolitan Planning Organization

NTD: National Transit Database

SOP: Standard Operating Procedure

TxDOT: Texas Department of Transportation

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6. APPENDIX B

A. City Council Minutes or Resolution

Place here



Transportation Department

Safety Committee Formation

The Transportation Department has a total of 21 employees; this Safety Committee Formation shall be as followed.

Safety Chair – will only vote if there is a tie. Monica Law, Transit Manager
 One Driver Robert Trevino, Bus Operator
 One Dispatcher Maurice Burton, Transit Dispatcher
 One Engineer Tech Bill Dorminy, Traffic Engineering Teach
 One Planner Brett Huntsman, Transportation Planner

The Transportation Safety Committee shall meet as needed and no more than 30 days after an injury/accident to review injury/accidents that occurred within the department and/or division for corrective action.

The Transportation Safety Committee shall:

- Investigate the facts by reviewing all reports (internal, public records, police reports, etc.),
 statements, and any photos/video footage surrounding each accident to determine possible causes.
- b. Review the accident with the employee(s) involved;
- c. Determine if the accident was preventable or non-preventable;
- d. Complete the forms using the Point Assessment Tables and provide definitions to calculate points.
- Suggest any corrective action to prevent recurrence of an accident, i.e., change in operating procedure; equipment purchase; change or establishment of written procedures, rules, or instructions;
- f. Provide recommendations to the Department Director, or Division Manager, as appropriate, to impose final actions;
- g. Forward copy of the completed form to Human Resources Risk Advisor to complete the citywide log tracking application of the policy across all departments;
- h. Forward any discipline for employees in accordance with the City's disciplinary policy (written reprimand or higher for non-civil service and suspension or higher for civil service employees).



Hours of Service Policy and Fatigue Management Program

Grand Connection Transit

Based on Federal Transit Administration (FTA) Guidelines

1. Purpose

This policy outlines the Hours of Service (HOS) requirements and Fatigue Management Program for Grand Connection Transit to ensure the safety and well-being of employees, passengers, and the public.

2. Hours of Service Policy

2.1. Daily and Weekly Driving Limits

- Daily Driving Limit: Drivers are permitted to operate a vehicle for no more than 10 hours in a single shift.
- On-Duty Limit: Total on-duty time must not exceed 12 hours per day, including breaks and non-driving duties.
- Weekly Driving Limit: Drivers must not exceed 60 hours of duty within any sevenday period.

2.2. Rest Period Requirements

- Mandatory Rest Period: Drivers must have a minimum of 8 consecutive hours offduty between shifts.
- Extended Breaks: Drivers must take a **30-minute break** after every 4 hours of continuous driving.
- **Weekly Rest Period:** Drivers must have at least one full day (24 consecutive hours) off-duty within each seven-day work period.

2.3. Scheduling

• Supervisors will ensure that all work schedules comply with HOS limits to prevent violations.

2.4. Monitoring Compliance

- Use of electronic logging devices (ELDs) to track driving hours and ensure compliance with HOS regulations.
- Regular audits of logs to identify and address potential violations.

3. Fatigue Management Program



3.1. Education and Awareness

- **Training:** Annual mandatory training for drivers and supervisors on fatigue management, including recognizing signs of fatigue and strategies to mitigate it.
- **Communication:** Provide informational materials to employees about the effects of fatigue on safety and performance.

3.2. Scheduling Practices

- Avoid scheduling back-to-back shifts or shifts that disrupt normal sleep patterns (e.g., early morning or late-night shifts).
- Provide drivers with predictable schedules whenever possible.

3.3. Reporting Fatigue

- Drivers are encouraged to report fatigue concerns without fear of retaliation.
- Drivers feeling unfit for duty must immediately notify their supervisor.

3.4. Health and Wellness Support

- Access to wellness programs promoting healthy sleep habits, nutrition, and stress management.
- Encourage drivers to seek medical evaluations for sleep disorders, such as obstructive sleep apnea.

3.5. Incident Investigation

• All fatigue-related incidents or near-misses will be investigated to identify contributing factors and prevent recurrence.

4. Responsibilities

4.1. Drivers

- Adhere to HOS requirements and fatigue management guidelines.
- Report any signs of fatigue or medical conditions affecting fitness to drive.

4.2. Supervisors

- Monitor compliance with HOS regulations and address violations promptly.
- Ensure schedules promote adequate rest and recovery time for drivers.

4.3. Safety Manager

- Oversee the implementation and evaluation of the fatigue management program.
- Conduct periodic reviews of the program and make improvements as needed.

5. Enforcement and Accountability

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- Violations of this policy may result in disciplinary action, up to and including termination.
- Regular audits will be conducted to ensure ongoing compliance with FTA guidelines.

6. Review and Updates

This policy will be reviewed annually and updated as needed to comply with changes in FTA regulations or organizational needs.

Effective Date: January 01. 2023

Approved By: Monica Law, Transit Manager, Tony Flowers, Transit Analyst

This policy aligns with FTA guidelines to ensure safety and promote a culture of responsibility at Grand Connection Transit.

Policy on Assessing, Mitigating, and Monitoring Safety Risks Associated with Assault on Transit Workers

Grand Connection Transit Agency

Purpose

To establish a comprehensive framework for assessing, mitigating, and monitoring safety risks associated with assaults on transit workers, ensuring a safe and secure environment for employees, passengers, and the community.

Scope

This policy applies to all employees, contractors, and stakeholders of the Grand Connection Transit Agency, including bus operators, maintenance staff, administrative personnel, and any individuals interacting with transit employees.

1. Assessment of Safety Risks



The Grand Connection Transit Agency will:

1.1 Conduct Regular Risk Assessments

• Perform quarterly safety audits and risk assessments of transit operations to identify potential hazards and risks of assault on transit workers.

1.2 Engage Stakeholders

- Gather feedback from transit workers, passengers, and community members regarding safety concerns.
- Review incident reports, security footage, and data to identify trends and high-risk areas or times.

1.3 Collaboration with Law Enforcement

• Collaborate with local law enforcement to understand crime trends and integrate best practices for employee safety.

2. Mitigation Strategies

To minimize the risk of assaults on transit workers, the Grand Connection Transit Agency will implement the following measures:

2.1 Training and Education

- Provide mandatory conflict de-escalation and personal safety training for all transit workers.
- Conduct regular refresher courses and scenario-based training exercises.

2.2 Enhanced Security Measures

- Install and maintain surveillance cameras on all transit vehicles and at transit stations.
- Equip transit workers with communication devices for immediate access to emergency services.
- Increase visibility of security personnel during high-risk hours and in high-risk areas.

2.3 Physical Barriers and Equipment

- Install driver shields or barriers in buses and other transit vehicles.
- Ensure adequate lighting and clear signage in transit areas.

2.4 Public Awareness Campaigns

- Launch campaigns to educate the public about penalties for assaulting transit workers and promote a culture of respect.
- Display clear signage about zero-tolerance policies for assault on transit workers.



3. Monitoring and Reporting

To ensure the effectiveness of safety measures, the agency will:

3.1 Incident Reporting

- Implement a streamlined, confidential reporting system for transit workers to report assaults or safety concerns.
- Review all incidents promptly and follow up with appropriate actions, including notifying law enforcement when necessary.

3.2 Data Analysis and Reporting

- Analyze incident data regularly to identify patterns and evaluate the effectiveness of mitigation strategies.
- Share findings with leadership and law enforcement partners to improve safety measures.

3.3 Employee Support Services

- Provide access to counseling and support services for transit workers who experience or witness assaults.
- Offer leave and recovery assistance as needed.

3.4 Continuous Improvement

- Conduct regular reviews of safety policies and procedures, incorporating feedback from employees and stakeholders.
- Adjust mitigation strategies and allocate resources as necessary to address emerging risks.

4. Accountability and Enforcement

4.1 Policy Enforcement

• Supervisors and managers are responsible for ensuring compliance with this policy and addressing safety concerns in a timely manner.

4.2 Disciplinary Actions

• Employees who fail to comply with safety protocols may be subject to disciplinary action.

4.3 Public Accountability

• Assaults on transit workers will be reported to law enforcement, and violators will be prosecuted to the fullest extent of the law.

5. Policy Review

Agency Safety Plan



This policy will be reviewed annually or as needed to address evolving safety risks, changes in legislation, or advancements in technology.

Adoption and Implementation

This policy is effective immediately upon approval by the Grand Connection Transit Agency Board of Directors.

Approved by:

Monica Law, Transit Manager, Tony Flowers, Transit Analyst

Date: January 01. 2023

This policy reflects Grand Connection's commitment to the safety and well-being of its employees and the communities it serves.