



THE CITY OF NORMAN

AGENCY SAFETY PLAN (ASP)

Version 3, issued 07/28/2026

The City of Norman
201 West Gray Street
Norman, OK 73069

Agency Safety Plan Development, Approvals, & Certification

Signature of the Accountable Executive		
	Scott Sturtz, Director of Public Works	Date Signed
Signature of the Chief Safety Officer		
	Taylor Johnson, Transit & Parking Program Manager	Date Signed
Approval by the Board of Directors or an Equivalent Authority	This Agency Safety Plan was approved by the City of Norman City Council.	
	Stephen Tyler Holman, Mayor	Date Approved
	<i>NOTE: Attach approval documentation as an appendix to ASP (e.g., meeting minutes, approval resolution, etc.)</i>	
Transit Contractor Concurrence		
	Jesse Rush, COTPA Administrator	Date Signed
Entity that Drafted this Agency Safety Plan	The City of Norman	

Certification

The City of Norman certifies that this Agency Safety Plan meets the requirements of 49 CFR Part 673 as attested to by Resolution R-2627-12, which can be viewed in the addenda to this ASP.

Revision History

Revision Date	Version Number	Description of Revision
12-13-2022	0	Initial issuance of ASP
7-25-2023	1	Added Infectious Disease Language
05-13-2025	2	2025 Annual Review - updated personnel information
07-28-2026	3	2026 Annual Review updates include personnel info and Bipartisan Infrastructure Law required changes. Specific sections that comply with the current PTSAP requirements include the addition of the following: • Definitions for Assault on a Transit Worker, and Emergency • Employee Safety Reporting to include unsafe acts and near miss • Updated Performance Targets as required by 49 CFR 673 • Continuous Improvement text updates • Safety Promotion update to include new training requirements

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ADDENDA

Addendum	City of Norman
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Terms, Acronyms, & Abbreviations

Table 1. Definitions of Terms Used in ASP

Term	Definition
Accident	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	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 Safety Management System, 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.
Agency Safety Plan (ASP)	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and 49 CFR 673.
Assault on a Transit Worker	Assault on a Transit Worker means, as defined under 49 U.S.C. 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker.
CDC	Centers for Disease Control and Prevention
Chief Safety Officer (CSO)	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 Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in 49 CFR 673, or a public transportation provider that does not operate a rail fixed guideway public transportation system.
Collision	A vehicle accident in which there is an impact of a transit vehicle with: • Another transit vehicle • A non-transit vehicle • A fixed object • A person(s) (suicide/attempted suicide included) • An animal • A rail vehicle
Consultants/ Contractors	An individual who is compensated by the transit agency for directly operated services, the labor expense for the individual is reported in object class 501 labor, or for purchased transportation service, the labor expense for the individual meets the same criteria as object class 501 labor.

Term	Definition
Demand Response	A transit mode comprised of passenger cars, vans or small buses operating in response to calls from passengers or their agents to the transit operator, who then dispatches a vehicle to pick up the passengers and transport them to their destinations. A demand response operation is characterized by the following: a) The vehicles do not operate over a fixed-route or on a fixed schedule except, perhaps, on a temporary basis to satisfy a special need, and b) Typically, the vehicle may be dispatched to pick up several passengers at different pick-up points before taking them to their respective destinations and may even be interrupted en-route to these destinations to pick up other passengers. The following types of operations fall under the above definitions provided they are not on a scheduled fixed-route basis: • Many origins - many destinations • Many origins - one destination • One origin - many destinations • One origin - one destination
Emergency	As defined under 49 U.S.C. 5324, a natural disaster affecting a wide area (such as a flood, hurricane, tidal wave, earthquake, severe storm, or landslide) or a catastrophic failure from any external cause, as a result of which the Governor of a State has declared an emergency and the Secretary has concurred; or the President has declared a major disaster under section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5170).
Event	Any Accident, Incident, or Occurrence.
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.
Federal Transit Administration (FTA)	Federal Transit Administration (FTA) is an operating administration within the United States Department of Transportation.
Fire	Uncontrolled combustion made evident by flame that requires suppression by equipment or personnel or removal of the fuel source or removal of oxygen.
Fixed-Route	Services provided on a repetitive, fixed schedule basis along a specific route with vehicles stopping to pick up and deliver passengers to specific locations; each fixed-route trip serves the same origins and destinations, such as rail and bus; unlike demand responsive and vanpool services.
Hazard	Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
Incident	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 one or more persons as a result of an event that requires immediate medical attention away from the scene.
Investigation	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 Transit Database (NTD)	The National Transit Database (NTD) is a reporting system that collects public transportation financial and operating information.

Term	Definition
Occurrence	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.
Oklahoma Department of Transportation (ODOT)	The Oklahoma Department of Transportation (ODOT) is a multi-modal transportation agency whose mission "is to provide a safe, economical and effective transportation network for the people, commerce and communities of Oklahoma." ODOT is the Governor's designee for the administration of state and federal public transportation financial assistance programs for areas under 50,000 population.
OSONOC	Other Safety Occurrences Not Otherwise Classified (OSONOC) and not specifically listed as a Reportable Event, but which meet a reportable threshold. Includes (but not limited to): • Slips • Trips • Falls • Electric shock • Smoke or the odor of smoke/chemicals noticed in a transit vehicle or facility
Public Transportation Agency Safety Plan (PTASP) Final Rule	The Public Transportation Agency Safety Plan (PTASP) Final Rule (49 CFR Part 673) requires certain operators of public transportation systems that are recipients or subrecipients of FTA grant funds to develop safety plans that include the processes and procedures necessary for implementing Safety Management Systems (SMS).
Reportable Events	A safety or security event occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a transit maintenance facility, during a transit related maintenance activity or involving a transit revenue vehicle that results in one or more of the following conditions: <u>Non-Rail Modes:</u> • A fatality confirmed within 30 days of the event • An injury requiring immediate medical attention away from the scene for one or more person • Property damage equal to or exceeding \$25,000 • Collisions involving transit revenue vehicles that require towing away from the scene for a transit roadway vehicle or other non-transit roadway vehicle • An evacuation for life safety reasons
Risk	The composite of predicted severity and likelihood of the potential effect of a hazard
Safety Assurance	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, fire, hazardous material spill, act of nature (Act of God), evacuation, or OSONOC occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds

Term	Definition
Safety Management Policy	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)	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 Promotion	A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
Safety Risk Management	A process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Serious Injury	Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date 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
System Reliability	The safety performance measure System Reliability means the distance in miles between major mechanical failures. A reportable major mechanical failure is defined in the National Transit Database Glossary as "a failure of some mechanical element of the revenue vehicle that prevents the 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." System Reliability is determined by dividing the number of annual vehicle revenue miles by the number of major mechanical failures, by mode.
Transit Asset Management Plan	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

Table 2. Definition of Acronyms & Abbreviations Used in ASP

Acronym/Abbreviation	Definition
ACOG	Association of Central Oklahoma Governments
ADA	Americans with Disabilities Act of 1990
ASP	Agency Safety Plan
CSO	Chief Safety Officer
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
NTD	National Transit Database
ODOT	Oklahoma Department of Transportation

Acronym/ Abbreviation	Definition
OSONOC	Other Safety Occurrences Not Otherwise Classified
PTASP	Public Transportation Agency Safety Plan Final Rule (49 CFR Part 673)
SMS	Safety Management Systems
TAM	Transit Asset Management

SAFETY MANAGEMENT POLICY STATEMENT

Safety is a core value at the City of Norman, and management of safety is a core agency function. The City of Norman is dedicated to planning, designing, constructing, operating and maintaining transportation systems that optimize the safety of passengers, employees, consultants, contractors, emergency responders, and the public.

Accountability for safety begins with the Accountable Executive and permeates all levels of employees, including consultants and contractors. The following safety objectives reflect the City of Norman's overarching safety goals and demonstrate commitment to establishing, implementing, and continually improving Safety Management Systems (SMS):

- Integrate safety management into the primary responsibilities of all employees;
- Support SMS through allocation of resources and promotion of a safety culture that facilitates safe practices and effective employee safety reporting and communication;
- Define roles and responsibilities for all employees that contribute to safety performance and SMS;
- Implement risk-based hazard management consistent with risk acceptance levels;
- Monitor, and if applicable, implement CDC and Oklahoma State Department of Health guidelines to minimize the spread of infectious diseases.
- Operate an employee safety reporting program that ensures no action will be taken against any employee who discloses a safety concern unless disclosure indicates beyond reasonable doubt an illegal act, gross negligence, or a deliberate disregard of regulations or procedures;
- Comply with or exceed legislative and regulatory requirements and industry standards;
- Ensure systems and services that support operations meet or exceed agency safety standards;
- Require safety information and training to ensure all employees are competent in safety management for tasks allocated to them;
- Establish and measure safety performance against data-driven safety performance targets; and
- Continually improve safety performance and implementation of SMS.

By applying SMS as outlined above and detailed in this ASP, the City of Norman commits to making safety the top priority of all operations and to achieving an optimum level of safety through a cooperative effort in compliance of this ASP.

1 GENERAL

1.1 Safety Management System Overview

Safety Management Systems (SMS) is a formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk mitigation. SMS includes systematic and proactive procedures, practices, and policies for managing risks and hazards. By bringing employees and contractors together from all levels of the agency to manage risk, SMS helps agencies detect and address safety problems earlier, share and analyze data more effectively, and measure safety performance more precisely.

Four main components comprise SMS:

- **Safety Management Policy** (Section 1.5) is a transit agency's documented commitment to safety. The policy defines the transit agency's safety objectives and the safety accountabilities and responsibilities of its employees.
- **Safety Risk Management** (Section 3) is the process for identifying hazards and analyzing, assessing, and mitigating safety risk.
- **Safety Assurance** (Section 4) is the processes that ensures the implementation and effectiveness of safety risk mitigation, and ensures that the agency meets or exceeds its safety objectives through the collection, analysis, and assessment of safety data.
- **Safety Promotion** (Section 5) is a combination of safety training and communication applied to the agency's transportation system to support SMS.

1.2 Plan Applicability & Scope

1.2.1 Applicability

The Public Transportation Agency Safety Plan (PTASP) Final Rule (49 CFR Part 673) requires compliance by recipients and sub-recipients of FTA Urbanized Area Formula Grant Program funds under 49 USC § 5307¹.

1.2.2 Scope

This ASP meets all the requirements under 49 CFR part 673 and encompasses the equipment, facilities, plans, procedures, operations, and maintenance as they relate to the City of Norman's bus system. This ASP is scaled to the size, scope, and complexity of the City of Norman, which is a small public transportation provider as defined by 49 CFR part 673.

¹ The Bipartisan Infrastructure Law amends FTA's safety program at 49 U.S.C. § 5329(d) (Section 5329(d)) by adding to the public transportation agency safety plan (PTASP) requirements. This ASP has been amended to meet these additional requirements.

1.3 Plan Goals, Objectives, & Purpose

1.3.1 Goals

The overarching goal of this ASP is to enhance all aspects of safety within the City of Norman by guiding effective and proactive management of safety risks in the system and prioritizing capital investments using performance-based planning.

1.3.2 Objectives

The overarching objective of this ASP is to establish processes and procedures to support the implementation of SMS that meets Federal Transit Administration (FTA)-mandated requirements under the PTASP Final Rule (49 CFR Part 673) as amended.

As outlined in the Safety Management Policy Statement, specific safety objectives of this ASP and its established SMS include the following:

- Integrate safety management into the primary responsibilities of all employees;
- Support SMS through allocation of resources and promotion of a safety culture that facilitates safe practices and effective employee safety reporting and communication;
- Define roles and responsibilities for all employees that contribute to safety performance and SMS;
- Implement risk-based hazard management consistent with risk acceptance levels;
- Operate an employee safety reporting program that ensures no action will be taken against any employee who discloses a safety concern unless disclosure indicates beyond reasonable doubt an illegal act, gross negligence, or a deliberate disregard of regulations or procedures;
- Comply with or exceed legislative and regulatory requirements and industry standards;
- Ensure systems and services that support operations meet or exceed agency safety standards;
- Require safety information and training to ensure all employees are competent in safety management for tasks allocated to them;
- Establish and measure safety performance against data-driven safety performance targets; and
- Continually improve safety performance and implementation of SMS.

1.3.3 Purpose

This ASP formalizes the SMS principles and strategies for demonstrating Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion through all operations and maintenance activities of the City of Norman. The ASP defines the process for identifying, evaluating, and resolving hazards associated with operations of a bus system involved in revenue service. This process helps achieve the

highest practical level of operational safety for the riding public, employees, and anyone encountering the City of Norman Transit system.

1.4 Plan Review & Update

This ASP will be reviewed at least annually and updated as necessary to ensure that it remains current and consistent with FTA guidance and industry best practice. The City of Norman's Transit Chief Safety Officer (CSO) will initiate this review and will include all relevant staff, including frontline employees in this process. Additionally, when a significant change occurs within the City of Norman, the City will update the ASP with applicable changes.

The ASP will also be updated as necessary following any ASP audit to address any findings and recommendations and to improve the SMS program. If revised, the ASP will be re-issued for dissemination among all applicable stakeholders.

1.5 Transit Agency Information & System Overview

Transit Agency Name: City of Norman – Transit

Transit Agency Address: 1310 Da Vinci Street, Norman, Oklahoma

Name & Title of Accountable Executive: Scott Sturtz, Public Works Director

Name of Chief Safety Officer: Taylor Johnson, Transit & Parking Program Manager

Mode(s) of Service covered by this plan: Bus, Paratransit Services

Federal Transit Administration (FTA) Funding: Sections 5307, 5339

System Description

The City of Norman provides its bus services through a transit contractor, currently Oklahoma City's EMBARK. The two types of bus service provided by the City, fixed-route and paratransit, are described below. The bus service operates using 13 motor buses and 13 paratransit vehicles. Additionally, the City of Norman transit service is operating fare-free.

Fixed-Route Service (EMBARK Norman)

The City of Norman has six fixed-route bus lines. Five local routes serve various destinations in the community. A route to the Moore Social Security Office is provided twice a week.

Paratransit Service (EMBARK Plus)

Paratransit service complements the fixed-route transit system by providing lift-equipped transportation to people who are functionally unable to use local fixed-route service. The paratransit service provides shared-ride public transportation and requires an application and eligibility determination prior to use.

2 SAFETY MANAGEMENT POLICY

The City of Norman recognizes management of safety as a core agency function and is dedicated to planning, designing, constructing, operating and maintaining transportation systems that optimize the safety of passengers, employees, consultants, contractors, emergency responders, and the public. This commitment is established in the Safety Management Policy Statement provided at the beginning of this ASP and signed by the City's Accountable Executive.

2.1 Safety Accountability & Responsibilities

Under SMS, identified positions have specific safety responsibilities and authority. Refer to Table 3 for a matrix that names the specific agency position(s) and committee(s) responsible for each of the SMS roles and responsibilities described below.

2.1.1 All Employees

All Transit Agency employees and contractors, including agency leadership, executive management, and key staff, are responsible for safety. Each employee is required to work safely, correct unsafe behavior, identify and report safety hazards, and abstain from performing any task that the person feels could injure themselves or others.

2.1.2 Accountable Executive

The Accountable Executive is a single, identifiable person who has ultimate responsibility and accountability for implementing and maintaining the Transit Agency's SMS and this ASP. This is the same person responsible for carrying out the Transit Agency's Transit Asset Management (TAM) Plan. The Accountable Executive has control or direction over the human and capital resources needed to develop and maintain both the ASP and TAM. The Accountable Executive is also responsible for ensuring action is taken, as necessary, to address substandard performance in the SMS. This individual is the primary decision-maker who is ultimately responsible for both safety and TAM.

2.1.3 Chief Safety Officer

The CSO has the authority and responsibility for day-to-day implementation and operation of the City of Norman Transit's SMS. The CSO must have adequate training to take responsibility for safety and must have a direct line of reporting to their Accountable Executive. Small public transportation providers may designate a CSO who also manages other functions, and may be a full-time or part-time employee of the transit system, or a contracted employee.

2.1.4 Agency Leadership & Executive Management

Agency leadership and executive management is responsible for confirming the SMS is carried out at the City of Norman through incorporation of safety management practices into the agency's operational areas. Responsibilities include designating representatives from operations, maintenance, and other revenue service support functions to serve as

Key SMS Staff. Agency leadership and executive management is also responsible for encouraging SMS training for staff and taking ownership of the safety management processes and activities as they are implemented.

2.1.5 Key SMS Staff

In addition to the above positions, the City of Norman has subject matter experts who serve as Key SMS Staff and represent their departments to support SMS implementation. Key SMS Staff provide expertise on how to adapt existing departmental practices to SMS, identify departmental data and information resources to support SMS decision making, and meet with and update the CSO as necessary.

2.1.6 Safety Committees

Safety committees—whether standalone committees or incorporated into other committees—support SMS by informing and assuring agency management of safety issues affecting the agency and addressing safety issues assigned to it by the agency’s executive management.

Safety Roles & Responsibilities

Table 3 below describes the positions responsible for safety at the City of Norman and its transit contractor.

Table 3. City of Norman Safety Roles & Responsibilities Matrix

Roles & Responsibilities	Scott Sturtz, Director of Public Works/ Accountable Executive	Taylor Johnson, Public Transit Coordinator/ Chief Safety Officer	Jesse Rush, COTPA Administrator /Transit Contractor Executive	Mike Anderson, Safety Manager	Key SMS Staff (Transit Safety Council)
Safety Management Policy	A	P	S	S	
Safety Resource Allocation	P	S	S		
Safety Reporting & Follow-up		P	S		
Safety Performance Targets & Measurement	A	P	S		S
ASP Review & Update	A	P	S		
Hazard Identification & Mitigation		O	P		S
Safety Risk Management	A	P	S		S
Safety Assurance, Audits	A	P	S		S
Safety Assurance, Inspections		O	P		S
Accident Investigation		O	P	P	S
Safety Promotion, Communication		P	P	S	S
Safety Promotion, Training		O	P	S	S
SMS Implementation		P	S		S
Key: A = Approval. O = Oversight. P = Primary role. S = Secondary role/Support.					

The City of Norman's Transit Safety Council meets monthly to review safety data, discuss safety-related topics, confirm that the contractor and City are collectively meeting safety objectives and goals, and determine course corrections, additions or improvements to the contractor's SMS program. Safety topics include, but are not limited to, safety initiatives, hazards elevated through the safety risk management process, implementation of identified mitigations, safety audits, and employee-reported safety concerns. These meetings support SMS by informing and assuring the City of safety issues affecting the transit contractor and addressing safety issues assigned by executive management.

Additional safety coordination occurs at the transit contractor level where safety is incorporated into their other committees and activities to ensure that the system is operated and maintained in a safe manner.

2.2 Employee Safety Reporting

The City of Norman supports SMS through the allocation of resources and promotion of a safety culture that facilitates safe practices and effective employee safety reporting and communication. The City of Norman has established an employee safety reporting program that encourages employees and contractors to report safety conditions hazards or unsafe acts, such as a near miss, to senior management. The employee safety reporting program meets the following baseline components:

- Allows employees to report safety conditions to senior management
- Provides for anonymous reporting at the discretion of the employee
- Is accessible to all employees
- Ensures no action will be taken against any employee who discloses a safety concern unless disclosure indicates beyond reasonable doubt an illegal act, gross negligence, or a deliberate disregard of regulations or procedures

2.2.1 Employee Safety Reporting Program

The City of Norman requires its transit contractor to implement and maintain an employee safety reporting program that meets the requirements outlined in Section 2.2 of this ASP. The City will provide oversight to ensure the transit contractor is meeting these requirements by discussing their program at the regularly scheduled coordination meetings.

The City's current transit contractor, EMBARK, has an employee safety reporting program that encourages all employees to self-report and report any safety issues, concerns, or hazards. The program includes an open-door policy, the ability to schedule a meeting to meet with a Human Resources representative, and an online portal for safety reporting that can be done anonymously. EMBARK uses unintentional safety violations reported through the program to inform future training and instruction in order to prevent their recurrence. EMBARK further ensures no action will be taken against any employee who discloses a safety concern unless disclosure indicates beyond

reasonable doubt an illegal act, gross negligence, or a deliberate disregard of regulations or procedures.

2.3 Integration with Public Safety and Emergency Management

The City of Norman Police Department manages the radio frequencies used by the City's transit program and responds to incidents as necessary. The City of Norman conducts safety training annually to cover Emergency Management procedures. In addition, the Director of Public Works, who oversees the transit program, is a part of the Emergency Operations Committee when it is convened.

The City of Norman will provide oversight to ensure its transit contractor is participating in coordination efforts. Lessons gathered from these drills will be communicated to employees, and incorporated in training resources, as applicable.

2.4 Safety Performance Targets

The City of Norman has established safety performance targets based on the measures established under the National Public Transportation Safety Plan. These targets define quantifiable and measurable safety performance outcomes and conditions.

All measures will be evaluated over a fiscal year period against a 3-year average of data reported to the National Transit Database (NTD). For each measure, the performance target is defined as either maintaining or improving upon the 3-year average. For all measures, except System Reliability (Measure 5), "improvement" refers to a reduction. For System Reliability (Measure 5), "improvement" refers to an increase.

Table 4. City of Norman Safety Performance Targets

National PTASP Numbering	Performance Measurement	Performance Target
Measure 1a	Number of Major Safety Events	≤1
Measure1b	Major Event Rate per 100K VRM	≤0.25
Measure 1.1	Collision per 100K VRM	≤0
Measure 1.1.1	Pedestrian Collision Rate per 100k VRM	≤0
Measure 1.1.2	Vehicular Collision Rate per 100k VRM	≤0.25
Measure 2a	Number of Fatalities	≤0
Measure 2b	Fatality Rate per 100K VRM	≤0
Measure 2.1	Transit Worker Fatality Rate per 100K VRM	≤0
Measure 3a	Number of Injuries	≤0
Measure 3b	Injury Rate per 100k VRM	≤0
Measure 3.1	Transit Worker Injury Rate per 100K VRM	≤0
Measure 4a	Number of Assaults on Transit Workers	≤0
Measure 4b	Assaults on Transit Worker Rate per 100K VRM	≤0
	Total Major Mechanical Failures	≤0
Measure 5	Miles Between Major Mechanical Failures (System Reliability)	N/A

When requested, the City of Norman will provide the safety performance targets to the ODOT and to the region's Metropolitan Planning Organization, the Association of Central Oklahoma Governments (ACOG), to aid in the State and MPO planning processes, as applicable.

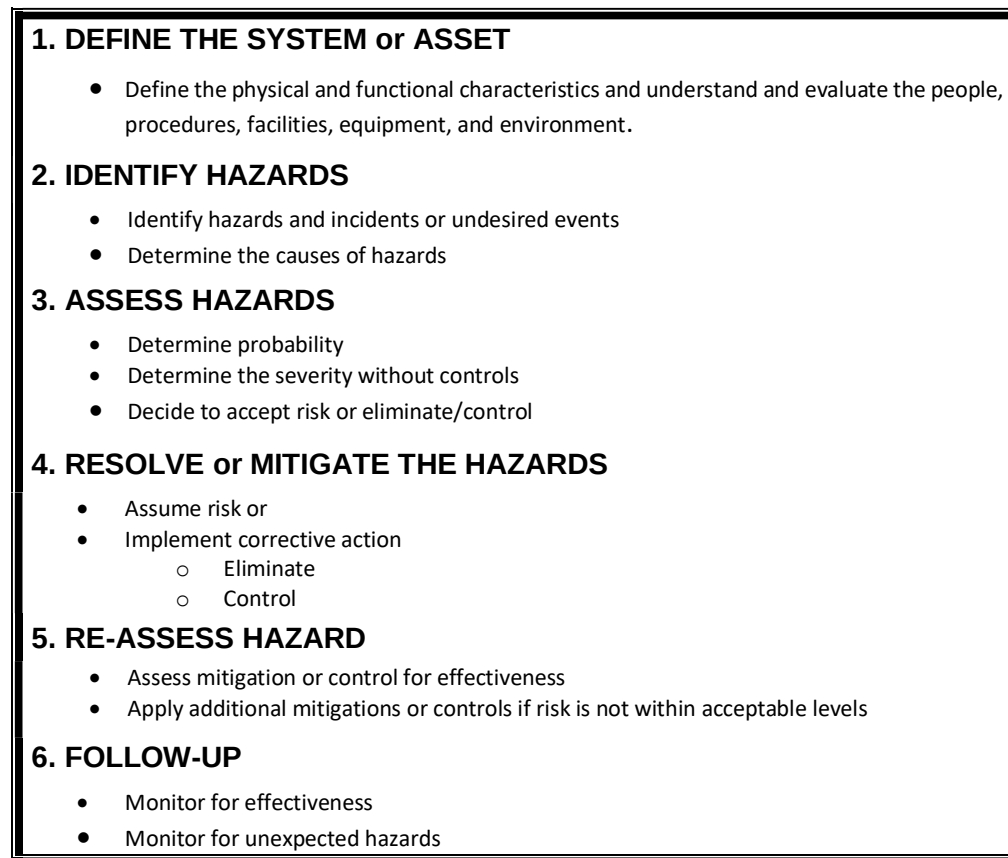
2.5 SMS Documentation & Records

The City of Norman will maintain and require documentation related to the implementation of this ASP and SMS. This includes documents included in whole, or by reference, which describe the programs, policies, and procedures used to carry out this ASP. These documents will be made available upon request by the FTA or other federal entity and will be maintained for a minimum of three years after they are created.

3 SAFETY RISK MANAGEMENT

This section provides detail on safety risk management. Safety risk management includes the activities that a public transportation agency undertakes to control the probability or severity of the potential consequence of hazards. Major safety risk management sub-components include Hazard Identification and Analysis and Safety Risk Evaluation and Mitigation. Figure 1 below summarizes the six basic steps of safety risk management.

Figure 1. Safety Risk Management Process



3.1 Safety Hazard Identification

The first step in a hazard analysis is defining the systems and sub-systems subject to hazards, followed by identifying specific physical and procedural hazards related to the identified systems and subsystems. A safety hazard is:

- Any real or potential condition that can cause personal injury or death or damage to or loss of equipment or property,
- A condition that may be a prerequisite to an accident, or
- Is a situation that has the potential to do harm.

Hazards are identified through a variety of sources, including those listed below. In addition, SMS enables every employee to identify hazards through Safety Promotion efforts and non-punitive hazard reporting, described further in Section 5.

- FTA's Hazard Analysis Guideline for Transit Projects (January 2000)
- Accident/incident data and experience
- Accident/incident data from other bus systems with similar characteristics
- Hazard scenarios
- Applicable industry standards
- Field assessments and surveys
- Project-specific design data and drawings, reviews, testing, and start-up activities
- Safety Assurance Activities

The following tools and techniques may be used for hazard identification and analysis:

- Preliminary Hazard Analysis
- Operational Hazard Assessment
- Accident/Incident Analysis
- Job Hazard Analysis

3.1.1 Infectious Disease Monitoring and Control

The City of Norman monitors current CDC and Oklahoma State Department of Health publications for the latest information about any new or potential pathogen and will implement recommended guidelines to ensure the safety of employees and the public. mitigations can include but are not limited to air purification systems, driver barriers, and mask mandates when required.

3.1.2 Safety Risk Assessment

After identifying system-specific hazards, safety risk management assesses safety risk by first identifying the potential to do harm in the system and then analyzing options to mitigate the hazard to an acceptable level. The process seeks to identify and define as many hazardous conditions as possible and initiate the safety risk mitigation process before those conditions or associated activities cause an accident.

The methodology for analyzing safety risk has two elements: evaluating hazard severity and evaluating hazard probability. The US Department of Defense's Standard Practice for System Safety, MIL-STD-882E, establishes system safety criteria guidelines for determining hazard severity and probability. This ASP adapts the MIL-STD-882E Risk Assessment and Hazard Risk Index matrixes to the transit environment for use in the City of Norman safety risk assessment process.

3.1.3 Hazard Severity

Hazards are rated in terms of their effect on transit customers, employees, the public, and the operating system. Hazard severity is a subjective measure of the worst credible

case consequence that results from design inadequacies, component failure or malfunction, human error, environmental conditions, or operating or maintenance practice, and procedure deficiencies. Figure 2 illustrates these ratings. The categorization of hazards is consistent with risk-based criteria for severity and reflects the principle that not all hazards pose an equal amount of risk.

Figure 2. Hazard Severity Definition

SEVERITY	CHARACTERISTICS			
	People	Equipment/Services	Financial	Reputational
Catastrophic	Several deaths and/or numerous severe injuries (per event)	Total loss of equipment or system interruption, requiring months to repair	Estimated loss from the incident in excess of \$500,000	Ongoing media coverage, irreparable reputational damage, government intervention (weeks – months)
Critical	Low number of deaths and/or serious injury* (per event)	Significant loss of equipment or system interruption, requiring weeks to repair	Estimated loss from the incident in excess of \$100,000-\$499,999	Prolonged media campaign, serious reputational damage, sustained government involvement (days - weeks)
Moderate	Minor injury and possible serious injury (per event)	Some loss of equipment or system interruption, requiring seven or less days to repair	Estimated loss from the incident in excess of \$10,000-\$99,999	Adverse media coverage, reputational damage, government involvement
Minor	Possible minor injury (per event)	Some loss of equipment, no system interruption, less than 24 hours to repair	Estimated loss from the incident in excess of \$1,000-\$9,999	Local media coverage and some reputational damage
Insignificant	No injury	Minor damage to equipment no system interruption, no immediate repair necessary	Estimated loss from the incident is likely less than \$1,000	No adverse media coverage or reputational damage
*Per 49 CFR 673, serious injury: 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.				

3.1.4 Hazard Probability

The probability that a hazard will occur during the planned life expectancy of the system element, sub-system or component is described qualitatively, in potential occurrences per unit of time, events, population, items, or activity. A qualitative hazard probability is derived from research, analysis, evaluation of safety data from the operating experience of the agency or historical safety data from similar bus systems, and from expert opinion. Figure 3 summarizes the hazard probability categories.

Figure 3. Hazard Probability Categories

Probability Level	Specific Individual Item	Fleet or Inventory	Frequency
Frequent A	Likely to occur frequently in the life of a system	Continuously experienced	> 1 event / month
Probable B	Will occur often in the life of a system	Will occur frequently in the system	> 1 event / year
Occasional C	Likely to occur sometime in the life of an item	Will occur several times	>1 event / 10 year
Remote D	Unlikely, but possible to occur in the life of an item	Unlikely, but can be expected to occur	> 1 event / 20 years
Improbable E	So unlikely, it can be assumed occurrence may not be expected	Unlikely to occur, but possible	< 1 event during 30 years

3.2 Safety Risk Assessment

Together, hazard severity and probability measure a hazard's magnitude and priority for applying the control measures. Hazards are then examined, qualified, addressed, and resolved based on the severity of a potential outcome and the likelihood that such an outcome will occur. The value derived by considering a hazard's severity and probability is the Hazard Risk Index. The resulting risk index is a measure of the acceptability or undesirability of the hazard and is applied to the Risk Assessment Index.

Assignment of a Safety Risk Matrix enables the City of Norman management to properly understand the amount of risk involved by accepting the hazard relative to what it would cost (schedule, dollars, operations, etc.) to reduce the hazard to an acceptable level.

Figure 4 identifies the Safety Risk Matrix, based upon hazard severity and probability, and outlines the criteria for further action and decision authority based on each matrix category. The Safety Risk Matrix is used to assist the decision-making process in determining whether a safety risk should be eliminated, controlled, or accepted. This helps prioritize hazardous conditions and focus available resources on the most serious hazards requiring resolution while effectively managing available resources.

For example, if the potential for an accident/incident reveals a Category 1 (catastrophic) occurrence with a Level A (frequent) probability, the assessed level of risk is Unacceptable and the system safety effort is directed toward eliminating the hazard or at the very least to implementing redundant hazard control measures. A Category 1 (catastrophic) or Category 2 (critical) safety risk may be tolerable if it can be demonstrated that its occurrence is highly improbable. This approach provides a basis for logical management decision-making that considers the hazard's severity and probability.

Figure 4. Safety Risk Matrix

Safety Risk Matrix					
Frequency Or Probability	Severity Category				
	1 Catastrophic	2 Critical	3 Moderate	4 Minor	5 Insignificant
(A) Frequent	1A	2A	3A	4A	5A
(B) Probable	1B	2B	3B	4B	5B
(C) Occasional	1C	2C	3C	4C	5C
(D) Remote	1D	2D	3D	4D	5D
(E) Improbable	1E	2E	3E	4E	5E

LEGEND

	Unacceptable - Cannot be accepted as is, <u>must</u> be mitigated
	Undesirable - Acceptable with Executive-level signoff
	Acceptable w/ Review - Acceptable Operational-level signoff
	Acceptable - Can be accepted as is

“Unacceptable” means the hazard cannot remain as is but must be mitigated.

“Undesirable” means that the hazard should be mitigated, if possible, within fiscal constraints. However, the hazard may be mitigated at a later time. Further, a management decision must be made as to when and how a hazard associated with an undesirable risk will be mitigated, or if management allows the hazard to exist and accepts the associated risk.

“Acceptable with review” or higher must be reviewed by management and must determine the risk associated without mitigating the hazard.

“Acceptable” means that the hazard can remain.

Managers can use the Safety Risk Matrix above to prioritize hazardous conditions and focus available resources on the most serious hazards requiring resolution while effectively managing the available resources.

3.3 Safety Risk Mitigation

As safety risks are identified, whether through a formal risk assessment or informally such as through employee reporting mechanisms, hazards can be resolved by deciding to either assume the risk associated with the hazard or to eliminate or control the risk. Mitigation to bring a hazard to an acceptable level of risk is applied in the following

order of precedence, listed from most effective at the top of the list to least effective mitigations at the bottom:

- Avoidance
- Elimination
- Substitution
- Engineering Controls
- Warnings
- Administrative Controls such as Operations and Maintenance Procedures
- Personal Protective Equipment and Guards

The City of Norman's Safety Manual establishes its hazard assessment process and policy. The City will audit and provide oversight to ensure its transit contractor is either applying the City's hazard assessment process or is applying its own process that meets or exceeds that of the City. With either approach, the City requires that its transit contractor manages safety risk at a level acceptable to the City.

As such, the City of Norman requires its transit contractor to communicate where identified elevated risk could potentially impact the City. As the owner of the transit system's safety risk, the City must review elevated risk and proposed mitigations. When mitigations are agreed upon by the City and transit contractor for identified hazards, mitigations are tracked through the safety assessment program to ensure all concerns raised have been addressed, mitigated, and implemented.

Refer to Policy 100-1 in the City of Norman Safety Manual, attached for reference, for a description of the City's risk assessment process.

4 SAFETY ASSURANCE

Safety assurance includes safety reviews, evaluations, audits, and inspections, as well as data tracking and analysis and investigations. Safety assurance provides for the implementation and effectiveness of safety risk management, and confirms that the City of Norman meets or exceeds its safety objectives through the collection, analysis, and assessment of information. The City of Norman will continually assess the effectiveness of their safety risk mitigations through their safety assurance efforts and report the results of the review to the Accountable Executive.

4.1 Safety Performance Monitoring & Measurement

SMS generates data and information that senior management need to evaluate whether implemented safety risk mitigations are appropriate and effective, and how well an agency's safety performance fits with their established safety objectives and safety performance targets. Safety performance monitoring will occur through routine monitoring of operations and maintenance activities. It also includes risk monitoring to track implementation and success of mitigations and controls put in place to manage risk.

At a minimum, the City of Norman will implement an annual audit that evaluates safety in compliance with this ASP and SMS. The audit program will consider how successfully and consistently the performance monitoring activities listed below are being performed. The annual audit report will be made available to the Accountable Executive and be considered as a foundation document for the annual ASP review and update process.

Monitoring and measurement activities that will be included in the internal audit will include at least the following:

- Monitor compliance and sufficiency of procedures for operations and maintenance
- Monitor operations to identify ineffective, inappropriate, or unimplemented safety risk mitigations
- Monitor effectiveness of mitigations implemented as a result of investigations of safety events and identification of causal factors
- Monitor information from safety reporting systems
- Document audit outcomes
- Collect and track safety data

4.2 Management of Change

The City of Norman will evaluate significant changes that occur within the agency or Transit Contractors for safety impacts by following these steps:

1. *Identifying proposed changes:* shall be completed within the City of Norman Safety Coordination meetings

2. *Assessing proposed changes:* stakeholders assess the proposed changes to determine whether a proposed change may have an unintended risk.
3. *Evaluating a proposed change:* stakeholders will determine if the change may introduce a new hazard or have an impact on safety performance.
4. *Documenting proposed changes:* If the change has a safety impact, risk associated with the change will be evaluated, mitigated, and documented following the processes outlined in the ASP SRM section. If the change does not have a safety impact, no further steps will be taken.

These changes will be discussed as part of the City of Norman's safety committee activities and may include, but are not limited to:

- New contractors or substantive amendment to contract provisions
- New buses, equipment, and/or facilities
- New or changed routes
- Other changes that might have a safety impact

4.3 Continuous Improvement

The City of Norman actively monitors the performance of their SMS program to identify deficiencies in its processes or outcomes against general safety performance targets. Evaluation of the SMS programs ensures that they effectively and efficiently allow the City of Norman to meet safety objectives and performance targets. The City of Norman will use the data and information gathered while conducting safety performance monitoring to address any identified weaknesses in organizational structures, processes, and resources in a timely manner.

5 SAFETY PROMOTION

The City of Norman uses Safety Promotion to communicate and disseminate safety information to strengthen the safety culture. Safety promotion includes safety lessons learned, reporting systems, recommendations based on safety metrics, and safety training. The goal is to foster a positive safety culture where employees receive ongoing training and updates of safety progress; feel comfortable reporting safety issues or concerns; and understand why safety is important and how they impact safety.

5.1 Safety Communication & Culture

The City of Norman will communicate safety messaging to employees, contractors and customers through placards, message boards, reader boards, social media communication, etc.

The City of Norman will communicate safety performance goals, objectives and targets to their employees and contractors. The Safety Management Policy Statement of this ASP will be communicated to all agency employees and contractors through multiple methods, including the methods outlined above.

The City of Norman is also responsible for communicating operational or maintenance safety hazards and their mitigations to employees and contractors relevant to those employees' and contractors' roles and responsibilities. Additionally, the response to any hazard reported through the employee safety reporting program will be communicated to employees and contractors by the Agency's CSO.

The City of Norman will review lessons learned from incidents, accidents and reported hazards and provide feedback to their employees and contractors regarding findings. This communication is an important step in letting employees know that they are important to the organization.

5.2 Competencies & Training

The City of Norman will establish and implement a safety training program that includes de-escalation training, safety concern identification and reporting training and refresher training, as appropriate, for all employees directly responsible for safety. The City of Norman will require compliant safety training programs from their contractors. The Accountable Executive and CSO will be adequately trained and demonstrate competence in safety management. The CSO will also establish and implement training at all levels of the organization to support SMS implementation. This training will be consistent with FTA requirements under the PTASP Final Rule, and the CSO will monitor and document training competencies for all employees.

The City of Norman requires its employees and contractors with direct safety responsibilities to be adequately trained and demonstrate competency in the aspects of safety management applicable to their roles and responsibilities. The City's Safety Policy provides minimum safety requirements by job function for its employees and

contractors. The City will provide oversight to ensure its transit contractor is implementing a safety training program that meets the requirements described in Section 5.2 of this ASP and in the City's Safety Policy. The City also requires the following:

- All operators are trained, certified or licensed to operate assigned vehicles and equipment, including both in-service and classroom training.
- Supervisors are appropriately trained in safety, accident prevention and investigation.

Refer to policy 001-3 in the City of Norman Safety Manual for the City's safety training policy and additional detail on safety training requirements.

5.3 Contractor Safety Program

The City of Norman procurement department will evaluate all contracts for safety impacts and include safety-related procurement language and specification requirements, as applicable. Any contractors will demonstrate job-appropriate training and competencies that meet or exceed the requirements of City of Norman.

CITY OF NORMAN ADDENDA

CITY OF NORMAN

201 W Gray St.
Norman, OK 73069

Safety-Related Agency Documents

The City of Norman and its transit contractor maintain the following safety-related documents:

- City of Norman Drug-Free Workplace Policy, 300-25 in Personnel Manual
- City of Norman Emergency Management Plan, 500-1, December 2015
- City of Norman Hazard Assessment Policy, Policy 100-1, November 2014
- City of Norman Safety Manual, August 2013, which includes the following:
 - City of Norman Safety Training Curriculum, Updated Continuously
 - City of Norman Security Policy, (No policy number) April 2019
 - City of Norman Vehicle Safety Policy, Policy 001-4, December 2018
- City of Norman development in cooperation with frontline employee representatives