

Attachment A

Public Transportation Agency Safety Plan



Madison County Mass Transit District (MCT)

July 2022

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Section 1. Transit Agency Information

General Information

Madison County Transit

Accountable Executive: Steven J. Morrison

1 Transit Way

Chief Safety Officer: Summer Moore

Pontoon Beach, IL 62040

Phone: (618) 797-4600

Modes of Service: Fixed Route Bus (MB), Demand Response (DR),

FTA Funding Sources: FTA Section 5307, 5311, 5310, 5339, CMAQ

Modes of Service Directly Provided: None

Overview

The Madison County Mass Transit District (MCT) is a municipal corporation organized in 1980 under the Local Mass Transit District Act (70 ILCS 3610) of the Illinois State Statutes. MCT provides a vast array of multi-modal transportation services.

MCT Service Area

The MCT District service area encompasses 16 member townships, covering 482 square miles including the incorporated municipalities of Alton, Bethalto, Collinsville, East Alton, Edwardsville, Glen Carbon, Godfrey, Granite City, Hartford, Highland, Madison, Maryville, Pontoon Beach, Roxana, South Roxana, St. Jacob, Troy, Venice, and Wood River.

MCT Services

MCT provides a diverse array of transportation services including a fixed-route public transit system, complementary Paratransit service for eligible elderly and disabled residents, a 137-mile bikeway network known as the MCT Trails, and RideFinders, the St. Louis region's carpool/vanpool program.

- 93 fixed-route buses on 28 routes carrying more than 1.2 million passengers each year;
- 26 vehicles in Runabout Paratransit service carrying more than 43,000 registered individuals annually;
- 137 miles of scenic Class I bikeways known as the MCT Trails;
- 5 passenger transfer stations: Alton, Collinsville, Edwardsville, Granite City and Wood River;
- 11,000 commuters in the RideFinders ride-matching database, 142 RideFinders vanpoolers and 5,255 registered carpoolers;

Working in conjunction with other Madison County and St. Louis area organizations, including Metro, MCT provides an important link in the chain of seamless regional transportation services.

Contracted Service Information:

Madison County Mass Transit District (MCT) is a municipal corporation organized pursuant to the Local Mass Transit District Act (70 ILCS 3610) of the Illinois State statutes. MCT is a grant recipient and does receive FTA 5307 funds. MCT contracts with The Agency for Community Transit (ACT) for the operation of all public transit (fixed route and paratransit) services in Madison County.

The Agency Safety Plan addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.

Section 2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan		Illinois Department of Transportation in cooperation with the Madison County Mass Transit District (MCT)	
Signature by the Accountable Executive		Signature of Accountable Executive	Date of Signature
Approval by the Board of Directors or an Equivalent Authority		Name of Individual/Entity That Approved This Plan	Date of Approval
		Relevant Documentation (title and location)	
Certification of Compliance		Name of Individual/Entity That Certified This Plan	Date of Certification
		Relevant Documentation (title and location)	
Version Number and Updates			
<i>Record the complete history of successive versions of this plan.</i>			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
7/2020		Initial Implementation	1/13/2020
7/2022	§1./3; §3./6; §4./10 &11	General Information (address & personnel change); Safety Performance Targets (annual update); Authorities, Accountabilities, and Responsibilities (personnel change); Bi-Partisan Infrastructure Law Changes.	7/2022
Annual Review and Update of the Public Transportation Agency Safety Plan			
<i>Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.</i>			
The Madison County Mass Transit District (MCT) provides no direct transit services. All operations services for public transit are contracted by Agency for Community Transit (ACT). The transit district provides oversight and contract management and meets a minimum of once a month with contractor to review their Safety Management Systems, compliance, and contractual obligations.			

Section 3. Safety Performance Targets

As a recipient receiving assistance under section 5307, Madison County Mass Transit District (MCT), shall allocate no less than 0.75 percent of funds to safety-related projects eligible under section 5307. In the event MCT does not meet the performance targets, the allocated amount will be utilized the following fiscal year for projects that are reasonably likely to assist in meeting the performance targets, including modifications to rolling stock, and de-escalation training.

Safety Performance Targets Specify safety performance targets based on the safety performance measures established under the National Public Transportation Safety Plan. <i>The following targets were developed based on the past three years of transit safety data collected by the Madison County Mass Transit District (MCT).</i>							
Mode of Service	Fatalities (Total)	Fatalities (per 100k VRM)	Injuries (Total)	Injuries (per 100k VRM)	Safety Events (Total)	Safety Events (per 100k VRM)	System Reliability (VRM/failures)
Fixed Route (MB)	0.00	0.00	12.33	0.35	14.33	0.41	44,134
Paratransit/ Demand Response (DR)	0.00	0.00	2.00	0.45	2.67	0.59	44,049
Vanpool (VP)	0.00	0.00	0.00	0.00	0.67	0.11	164,363

Safety Performance Target Coordination <i>Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.</i>		
Once the targets are developed as part of the Plan update in July of each year, MCT will share and discuss those targets and amendments with the East-West Gateway MPO and submit to IDOT at requested time.		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Illinois Department of Transportation	
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	East-West Gateway MPO	

Section 4. Safety Management Policy

Statement

Madison County Mass Transit District (MCT) strives to provide safe, reliable, comfortable, and innovative transportation options to every member of the community. The Public Transportation Agency Safety Plan (PTASP) has been developed to integrate safety into all MCT operations. By using the procedures contained in the PTASP, MCT can continue to improve the safety and security of its transit contracting services.

This PTASP describes the policies, procedures, and requirements to be followed by MCT management, to ensure a safe environment for contracted transit employees, riders, and the general public. The goal of this program is to eliminate the human and fiscal cost of avoidable personal injury and vehicle accidents.

MCT and the service contractor have a responsibility under the PTASP. The Accountable Executive will provide the continuing support necessary to achieve the PTASP objectives. A key to the success of this effort is for employees to be aware that they are accountable for safely performing the requirements of their contract. The success of the program also depends on all employees actively identifying potential hazards and making a commitment to the safety of others.

MCT and its contractor must be aware that decisions and actions often affect the safety of those in other operations. By following the processes described in the PTASP, MCT will continue to monitor performance and the safety of the system while creating a culture of safety.

MCT's commitment is to:

- **Support** the management of safety through the provision of appropriate resources that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- **Integrate** the management of safety among the primary responsibilities of all staff;
- **Clearly define** for all staff, managers, and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of MCT's safety management system;
- **Establish and operate** hazard identification and analysis, and safety risk evaluation activities--including an employee safety reporting program as a fundamental source for safety concerns and hazard identification--to eliminate or mitigate the safety risks of the consequences of hazards resulting from MCT operations or activities to a point which is consistent with an acceptable level of safety performance;
- **Ensure** that MCT and ACT will take no action against any employee who discloses a safety concern through the employee safety reporting program,

unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;

- **Comply** with, and wherever possible exceed, legislative and regulatory requirements and standards;
- **Ensure** that sufficient skilled and trained human resources are available to implement safety management processes;
- **Ensure** that staff provides adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills;
- **Establish and measure** safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- **Continually improve** safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and
- **Ensure** externally supplied systems and services to support operations are delivered, meeting established safety performance standards.

MCT's Goals for Safety are established as follows:

- In collaboration with ACT, design, construct, test, and operate a transportation system that achieves an optimum level of safety performance of other transit systems of a similar size in the United States.
- Identify and evaluate, then eliminate or control hazards to employees, customers, and the public.
- Ensure ACT meets or exceeds all government and industry occupational health and safety standards and practices.

The objectives of the PTASP are the means to achieving its goals. They also provide a method of evaluating the effectiveness of MCT's safety efforts. The PTASP objectives for MCT are:

- Integrate safety management and hazard control practices.
- Assign responsibilities for developing, updating, complying with, and enforcing safety policies, procedures, and requirements.
- Verify compliance with ACT's safety policies, procedures, and requirements through performance evaluations, accident/incident trends, and contract oversight.
- Investigate all accidents/incidents, including identifying and documenting the causes for the purpose of implementing corrective action to prevent a recurrence.
- Increase investigation and systematic documentation of near misses.
- Identify, analyze, and resolve safety hazards in a timely manner.

- Minimize system modifications during the operational phase by establishing and utilizing safety controls at system design and procurement phases.
- Ensure that system modifications do not create new hazards.
- Train employees and supervisors on the safety components of their job functions.

MCT takes these commitments seriously as the lives of MCT riders, employees and the general public depend on the transit district's ability to oversee contractor's culture of safety.

Accountable Executive

Date

Communication

MCT realizes the importance of ensuring employees and riders are aware of safety management policies and procedures to effectively manage the system's day to day operations. Staff meets weekly to review performance and safety and again monthly to review trends in safety data. In addition, staff are constantly evaluating existing policies and procedures to verify their effectiveness. To do this, MCT seeks input from all staff to determine if change is necessary based on trends, data analysis, operational changes, or new assets.

ACT provides safety instruction, safety notices and processes to improve risk management as well as collects safety data and monitors performance and safety events to identify trends where safety is below agency standards. MCT ensures ACT is following the company-wide Agency Safety Plan (ASP) which has been provided to MCT.

Depending on the importance of the policy or Standard Operating Procedure (SOP) change, an acknowledgement signature is required of each employee verifying their understanding of the change.

The contract with ACT began in 1986 and oversight is conducted daily with MCT co-located with ACT.

Riders: If a rider policy is changed or added, staff notifies riders through the following methods:

- ◆ Notice posted on vehicle and facilities including effective date and who to contact for more information
- ◆ Changes to digital rider guidance including schedules and ride guides as appropriate
- ◆ Public Meetings
- ◆ Social Media, Website Service Notices, E-News, and Text Alerts program.
- ◆ Any services impacted by policies changes will include outreach as required by Federal Guidance.

Authorities, Accountabilities, and Responsibilities

As mentioned in the Safety Policy Statement, the ultimate authority for the success of this PTASP falls to the Accountable Executive (AE), department managers, as well as employees fulfilling their commitment to safety on a day-to-day basis supporting the AE.

Accountable Executive (AE): The AE will determine, based on feedback from staff, the level of Safety Management System (SMS) principals to maintain to ensure a safe work environment, rider experience and community safety. MCT's AE is committed to providing contracts that will enable contract management to provide the tools and training needed to be successful and safe providing service for MCT.

The AE, Steven J. Morrison, and his staff will provide contract oversight and monitoring to include accountability for all aspects of safety. The AE is responsible for developing the RFP process for contracted service and will include language relative to the responsibility of the contractor to manage and operate service using SMS principals. Though contractors are not required under 49 CFR Part 673 to develop their own PTASP, they are required to follow SMS methods of managing risk to include compliant Employee Safety Reporting Program. ACT has developed a Transit Agency Safety Plan for all its employees to follow and the transit district ensures the Plan is being followed.

Chief Safety Officer (CSO): The CSO, Summer Moore, who provides reports and information directly to AE, is responsible for ensuring safety elements in the following areas are properly managed with the intent of creating a culture of safety. The CSO will participate in training relative to their role in implementing SMS per requirements in 49 CFR Part 673.

- Employee Safety Reporting Program
- Safety Performance Targets and Measures
- Safety Risk Management
 - Safety Hazard Identification
 - Safety Risk Assessment
 - Safety Risk Mitigation
- Safety Assurance
 - Safety Performance Monitoring and Measurement
- Safety Promotion
 - Competencies and Training
 - Safety Communication
 - De-escalation Training

Safety Committee (SC): The SC, convened by a joint-labor management process, consisting of equal number of frontline employee representatives and management representatives, who are responsible for identifying and recommending risk-based mitigations or strategies to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment, and identifying safety deficiencies for purposes of continuous improvement.

Employee Safety Reporting Program

ACT provides Employee Safety Reporting Program (ESRP). The ESRP will include the importance of safety and hazard reporting, elements covering retaliation assurances for reporting safety risks and penalties for false reporting.

ACT includes an ESRP that applies to staff associated with the MCT contract including all operations and support personnel. The policy is combined with Anti-Harassment policies in the employee handbook. MCT as part of its oversight, will require reporting data on a monthly basis as part of the required performance and safety data reports.

Section 5: Safety Performance Targets and Measures

ACT collects monthly data to include safety and performance data. This data is used annually to develop safety performance targets included in this plan. ACT uses current and historic safety data to develop targets while also monitoring monthly data to identify trends requiring mitigation actions.

Section 6: Safety Risk Management

ACT has risk management policies, procedures, and processes in place to identify, assess and mitigate hazards. Any hazard identified is properly documented and provided to MCT if needed as part of the monthly data collection process. Documents related to risk management and monitoring are included in periodic operations and service reviews.

ACT has a robust reporting software developed in-house to identify risk and safety events, assess and mitigate risks and create a follow-up process allowing multiple users to add to the

digital file. This mechanism allows ACT the ability to sort safety events by type and generate data reports used for identifying trends during monthly safety meetings.

Section 7: Safety Assurance

ACT collects regular performance which includes safety performance targets as required by the Federal Transit Administration's National Transit Database and Illinois Department of Transportation. The AE and CSO evaluates this information to identify trends in performance and safety monthly. If anomalies are noted in the data, ACT staff will investigate to identify the cause of the variance.

The monthly data collected include:

- ◆ Passenger Counts by Route by Day
- ◆ Total Revenue Hours
- ◆ Accident Log (Preventable/Non-Preventable) (AFR)
- ◆ Employee Injuries (IFR)
- ◆ Complaints (Valid/Invalid)
- ◆ Road Calls (Vehicle Breakdowns that Require Maintenance to Scene and/or Towing)
- ◆ Monthly National Transit Database (NTD) Report to include the following:
 - Fatalities
 - Injuries
 - Safety Events
 - System Reliability
- ◆ Vehicle Inspection Report (Maintenance and Daily Vehicle Inspection Reports)
- ◆ Preventive Maintenance

ACT uses an Excel program to track these data points and conduct analysis to identify trends.

Additionally, MCT's AE or the ACT staff will conduct reviews of assets, records, and processes to ensure adherence to contractual obligations, contractors ASP and Federal compliance.

Section 8: Safety Promotion

Training programs include programs in safety, policy, compliance, and performance. ACT provides extensive new hire training, periodic training, and remedial/refresher training. Additionally, employees receive training from outside organizations like local first responders as well as State and Federal training programs. ACT staff meets on a bi-weekly basis for one-hour safety meetings covering syllabus topics or trending topics observed in the past weeks.

Training files are included in periodic site reviews by MCT to ensure training policies are kept current and are relative to current events or trends in safety.

Section 9: Additional Information

This PTASP was developed from information in other documents, policies and procedures and manuals. Those documents are listed below:

- ACT Employee Handbook
- Maintenance Guidelines
- ACT Internal Controls

- ACT Safety Security and Emergency Preparedness Plan
- Training Guides

Section 10: Definitions of Terms Used in the Safety Plan

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

- **Accident** means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
- **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan, in accordance with 49 U.S.C. 5326.
- **Equivalent Authority** means an entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.
- **Event** means any Accident, Incident, or Occurrence.
- **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.
- **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
- **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
- **Operator** of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.
- **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

- **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
- **Public Transportation Agency Safety Plan (or Agency Safety Plan)** means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
- **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk mitigation** means a method or methods to eliminate or reduce the effects of hazards.
- **Safety Assurance** means processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
- **Safety Management System** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
- **Safety performance target** means a performance target related to safety management activities.
- **Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
- **Safety risk assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
- **Safety Risk Management** means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
- **Serious injury** means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second or third-degree burns, or any burns affecting more than 5 percent of the body surface.
- **Transit agency** means an operator of a public transportation system.
- **Transit Asset Management Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, 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.

Section 11. Commonly Used Acronyms

Acronym	Word or Phrase
ADA	American's with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as a PTASP in Part 673)
CFR	Code of Federal Regulations
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
IDOT	Illinois Department of Transportation
MPO	Metropolitan Planning Organization
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
U.S.C.	United States Code
VRM	Vehicle Revenue Miles