Public Transportation Agency Safety Plan

Lane Transit District



January 2020

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Section 1. Transit Agency Information

General Information

Agency Name Lane Transit District

Administrative Office3500 East 17th Ave, Eugene OR 97403Accountable ExecutiveAurora Jackson, General Manager

Chief Safety Officer David Collier, Director of Human Resources & Risk

Management

Modes of Services Fixed Route Bus, Demand Response, Demand

Response Taxi, Bus Rapid Transit, Vanpool

FTA Funding Sources FTA Section 5307

Modes of Service Directly Provided Fixed Route Bus, Bus Rapid Transit

LTD does not provide transit services on behalf of another transit agency or entity.

Additional Facility Information

Bus Facilities/Repair Facilities

Glenwood Operations Base

3500 E.17th Avenue Eugene, OR 97403

This facility includes Lane Transit District's (LTD) administrative offices, operations base, primary repair facility, and garaging location for LTD-operated buses and non-revenue vehicles. The maintenance shop is a 24-hour facility for all maintenance, fueling, and servicing for the bus fleet.

Transit Stations/Park & Rides:

LTD operates 26 Park & Rides, eight transfer stations, and two stand-alone city center transit centers within Lane County.

Eugene Station

1080 Willamette Street Eugene, OR 97401

The Eugene Station has 19 parking bays for buses, including two specialized bays for the EmX line. The Customer Service Center (CSC) is located in the Eugene Station and is open weekdays for walk-in and telephone services. It is the main sales outlet for fare instruments and is responsible for distributing fare instruments and customer information to 14 satellite outlets, as well as assisting customers with trip planning. The CSC has a customer waiting area, public restrooms, and houses LTD's lost-and-found center.

Springfield Station

355 South A Street Springfield, OR 97477

The Springfield Station has eight parking bays for buses, including two specialized bays for the EmX line. The station includes a Park & Ride lot, retail food establishments, Greyhound Bus Terminal and public restrooms.

LTD RideSource Facility

240 Garfield Street Eugene, OR 97402

The LTD RideSource Facility provides the base for the administration, operations, and maintenance functions of RideSource. RideSource is contracted to MTM to provide curb-to-curb public transportation for persons traveling throughout Eugene and Springfield who cannot use the regular service because of a disability.

Section 2. Plan Development, Approval, and Updates

Name of Entiti Drafted This		RLS & Associates, Inc.				
Signature by the		Signati	ure of Accountable Executive	Date of Signature		
Accountable						
		Name of Ind Plan	ividual/Entity That Approved This	Date of Approval		
Approval by to						
Equivalent Au		Relevant Do	cumentation (title and location)			
		Name of Ind Plan	ividual/Entity That Certified This	Date of C	ertification	
Certification (of					
Compilation		Relevant Documentation (title and location)				
Version Nur	nber and Up	odates				
Record the c	omplete hist	ory of succes	ssive versions of this plan.			
Version Number	Section/Pag	ges Affected	Reason for Change		Date Issued	
Annual Review and Update of the Public Transportation Agency Safety Plan						
Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.						

Section 3 Safety Performance Targets

Safety Performance Targets

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

Mode of Transit Service	Fatalities	Injuries	Safety Events	System Reliability	Other	Other	Other
Fixed Route Bus	0	36	2.5/100K	7,241 miles			
Bus Rapid Transit	0	36	2.5/100k	7,241 miles			

Safety Performance Target Coordination

Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.

The decision making body of the Central Lane MPO is the Metropolitan Policy Committee (MPC), which was created by Eugene, Springfield, and Lane County to cooperate on issues of regional importance. The Metropolitan Policy Committee is comprised of public officials from Springfield, Eugene, Lane County, Coburg, Lane Transit District, and the Oregon Department of Transportation.

Targets	State Entity Name	Date Targets Transmitted
Transmitted to the State	Oregon Department of Transportation	
Targets Transmitted to the	Metropolitan Planning Organization Name	Date Targets Transmitted
Metropolitan Planning Organization(s)	Central Lane Metropolitan Planning Organization	
Organization(s)		

Section 4. Safety Management Policy

Safety Management Policy Statement

Lane Transit District (LTD) strives to provide safe, reliable, comfortable, and innovative transportation options to every member of the community. The LTD Board of Directors adopted Resolution # 2016-12 which embraces a Safety-Conscious Environment Focused on Eliminating Fatalities and Serious Injuries.

The Public Transportation Agency Safety Plan (PTASP) has been developed to integrate safety into all Lane Transit system operations. By using the procedures contained in the PTASP, LTD can continue to improve the safety and security of LTD's operation and services.

This PTASP describes the policies, procedures, and requirements to be followed by management, maintenance, and operations personnel to provide a safe environment for LTD employees, customers, and the general public. The goal of this program is to eliminate the human and fiscal cost of avoidable personal injury and vehicle accidents.

Each department has a responsibility under the PTASP. Directors and managers shall 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 position. The success of the program also depends on all employees actively identifying potential hazards and making a commitment to the safety of others.

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

LTD'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 managers and employees;
- 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 LTD'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 LTD operations or activities to a point which is
 consistent with an acceptable level of safety performance;

- Ensure that no action will be taken 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 all staff are provided with 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.

LTD's Goals for Safety are established as follows:

- Design, construct, test, and operate a transportation system that achieves an optimum level of safety, exceeding the safety performance of other transit districts of a similar size in the United States.
- Identify and evaluate, then eliminate or control hazards to employees, customers, and the public.
- Meet or exceed all government and industry occupational health and safety standards and practices.
- Maximize the safety of future operations by affecting the design and procurement processes.

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

- Integrate safety management and hazard control practices within each LTD department.
- Assign responsibilities for developing, updating, complying with, and enforcing safety policies, procedures, and requirements.
- Verify compliance with LTD safety policies, procedures, and requirements through performance evaluations, accident/incident trends, and internal audits.

- 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.

LTD takes these commitments seriously as the lives of depend on LTD's ability to operate in a culture of safety.	
Accountable Executive – Aurora Jackson (GM)	 Date Signed

Safety Management Policy Communication

LTD realizes the importance of ensuring its employees and riders are aware of LTD safety management policies and procedures to effectively manage the system's day-to-day operations. To do this, LTD relies on several forms of effective communication.

Employees: LTD is constantly evaluating existing policies and procedures to verify their effectiveness. To do this, LTD seeks input from all staff to determine if change is necessary based on trends, data analysis, operational changes or new assets. Several methods are used to communicate policy and/or procedure changes, including:

- Employee memorandum through paycheck, daily manifest of work orders, agency meetings
- Bulletin board notices
- Employee email notification
- Labor Union notification

LTD includes a training element for safety management policies impacting safety or service delivery and is conducted before the policy effective date. New policies and procedures are incorporated into orientation training for new employees as well.

Depending on the importance of the policy or procedure change, an acknowledgement signature is required of each employee verifying their understanding of the change.

Riders: If a rider policy is changed or added, LTD 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
- 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). The Chief Safety Officer (CSO), the administration and management team, as well as employees fulfilling their commitment to safety on a day-to-day basis support the AE.

Accountable Executive (AE): The Accountable Executive will determine, based on feedback from senior staff, the level of Safety Management System principals to maintain to ensure a safe work environment, rider experience and community safety. LTD's AE is committed to providing employees with the tools and training needed to be successful and safe in their roles with LTD. The AE will continually strive to create a culture of safety among the employees, and LTD expects each employee to play a role in maintaining a safe workplace.

LTD's AE will be responsible for developing an annual budget to provide the necessary funding to support training for new hires and experienced staff while also maintaining assets in a State of Good Repair (SGR) and/or replacing it, if it is no longer able to function as originally intended.

The current Accountable Executive, Aurora Jackson is also the General Manager and is responsible for implementation and changes to this Plan.

Chief Safety Officer (CSO): LTD has concluded one CSO will be sufficient to manage the day to day adherence to this Plan and, while in this role, report directly to the AE. As CSO, this individual will monitor safety and security throughout the organization including sub-contractors. All departments have been notified of the CSO's role and the established reporting requirements relating to safety-related matters.

LTD's CSO will be responsible for the following:

- Developing and maintaining SMS documentation;
- Directing hazard identification and safety risk assessment;
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and Board of Directors on SMS implementation progress; and
- Planning safety management training.

Roll of Staff to Develop and Manage Safety Management Systems (SMS)

Accountable Executive

The Accountable Executive (AE), who also serves as General Manager, will work with the Chief Safety Officer (CSO) and Administrative staff to adjust the PTASP as needed based on staff feedback, trends, and data analysis. The AE is vested with the primary responsibility for the activities of the transit district and overall safety performance. The AE fulfills these responsibilities by providing the resources necessary to achieve PTASP goals and objectives by exercising the approval authority for system modifications as warranted. The AE also sets the agenda and facilitates the cooperative decision making of the Leadership Council (management team).

Chief Safety Officer (CSO)

For purposes of managing the SMS and PTASP, the CSO will report directly to the AE to determine strategy, policy, and goals for maintaining safety and security for passengers, employees, and the general public. The CSO will monitor day to day operations and work with staff to identify and mitigate risk through evaluation, feedback, and data analysis.

Directors

Directors are responsible for the safety of their departments, including employees, facilities, operations, and services provided as well as the day-to-day management of the transit district. They are also responsible for providing resources to managers as necessary to resolve hazards and implement/maintain safety programs and training.

Managers

Managers are responsible for safety within their organizational units, including employees, facilities, operations, and services provided. This responsibility includes determining and implementing measures required to counteract safety hazards and problems and coordinating the implementation and maintenance of safety programs within their functional areas. They are also responsible for ensuring that employees have required licenses and up-to-date certifications. Furthermore, they are responsible for communicating safety information to employees, and for assuring that all employees follow all appropriate safety rules and procedures.

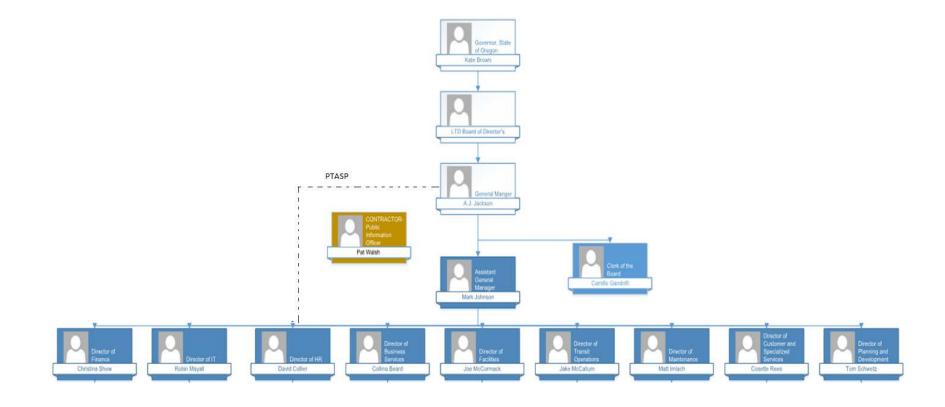
Supervisors

Supervisors are responsible for the safety performance of all personnel and equipment under their supervision. They are responsible for the initial investigation of all accidents and incidents, and for reporting these accidents and incidents to the Human Resources and Risk Management Department.

Employees

All LTD personnel are responsible for performing their work safely and for following established safety-related rules, procedures, and work practices. This includes reporting all accidents, incidents, and hazards to their supervisor per established requirements for the protection of themselves, co-workers, customers, facilities, and equipment.

Lane Transit District (LTD) Organization Chart



Key Staff

LTD staff will be responsible for maintaining high standards of safety, customer service, and security. The Employee Safety Reporting Program (ESRP) will define the employees' role to identify and mitigate risk through open communication to superiors including the CSO and AE. Administrative staff will be instrumental in ensuring action is taken to reduce risk and the whole system is continuously monitored to ensure actions are effective and appropriate.

LTD staff will be involved with updates, modifications and implementation of the PTASP. Each staff member brings a valued perspective to the development of policies and procedures he or she will be expected to implement. Every opportunity will be given for employees and riders to provide input to increasing safety at LTD. Those opportunities include monthly safety meetings, annual employee meetings and training, department meetings, customer and employee surveys and an open-door policy with access to all management staff.

Employee Safety Reporting Program (ESRP)

As stated in the <u>Safety Management Policy Statement</u>, LTD is determined to provide a safe working environment for its employees, riders and the general public. To ensure success, LTD has developed an ESRP to enable employees to report any risk or perceived risk to a supervisor, CSO, or member of administration.

The ESRP allows each employee to report detailed information and observations whether they are a driver in service, maintenance staff, or other on-duty employee. This program dovetails with other methods currently in place to proactively identify hazards or threats. Those methods include but are not limited to the following:

- Pre/Post Trip Inspections
- Preventive Maintenance Inspections
- Employee Evaluations
- Facility Maintenance Plan
- Service Evaluation and Planning Program
- Training Program
- Rider and Public
 Complaint/Compliment Process
- Safety and Employee Meetings
- Incident/Accident Policies
- Safety Committee

LTD's ESRP includes two tools for identifying potential or actual risks. First, a Hazard Identification Card, Appendix A, is used to identify hazards and threats and is accessible to all employees. Second, the Blue Card, Appendix B, similar to an incident report, is used to identify a hazard which could result in a safety situation. If the hazard is perceived to cause immediate danger, a supervisor will be notified immediately and mitigating action taken.

All employees have been trained in LTD's Hazard Identification process and the proper use of the Cards. All ESRP forms will be reviewed by the CSO to determine a course of action to mitigate the hazard or threat. Employees will receive no retribution or disciplinary action as a result of submitting the Form. If it is determined the employee completing the card contributed to the hazard or threat, disciplinary action may be taken.

Once a Hazard Identification Card has been submitted, it will be reviewed by the CSO, Risk Manager or AE to determine the level and time of action required, if any. LTD takes each of these cards seriously and will react with appropriate action.

The Card will be used as a starting point for investigating the perceived hazard or threat to determine if action is required, and if so, the appropriate action; the timeline for action; and follow-up to determine if the action was effective.

Section 5. Safety Risk Management

LTD provides training to all personnel in the identification of hazards and security threats while also providing tools to enable personnel to report these risks. Once the risk has been identified, LTD conducts an assessment of the risk to determine the necessary response and response time. The response may include further investigation or monitoring, action(s) to mitigate the hazard or security threat, and follow-up assessment to ensure the action taken is appropriate and effective.

The Risk Management function is managed within the Human Resources and Risk Management Department. The Department works to coordinate, promote, and evaluate safety within each District department and facility, and on LTD vehicles.

Examples of activities performed by Risk Management include the following:

- Update the PTASP periodically.
- Participate in, and manage, the Safety Committee (facilities).
- Participate in, and manage, the Accident Route Review Committee (vehicle).
- Participate in, and manage, the Risk Oversight Committee.
- Manage and coordinate LTD's Drug & Alcohol Program
- Ensure that facility safety inspections occur.
- Coordinate system-wide compliance with the System Safety Program Plan (SSPP).
- Assist with the development of proposed safety rules and procedures.
- Assist departments in the development and presentation of safety training and ensure mandated safety training is conducted as required.
- Be part of LTD's response to emergencies and major accidents.
- Work with insurance providers and safety consultants.
- Investigate accidents, incidents, injuries, and property losses as warranted; and make recommendations to mitigate and prevent recurrences.
- Analyze accidents, incidents, injuries, and property loss trends.
- Work with other departments to develop and implement loss prevention programs.
- Manage and coordinate illness and injury prevention programs.
- Assist in the evaluation and resolution of hazards that have not been resolved at the departmental level.
- Compile system safety data, perform analyses, and assist other departments in identifying and assessing operational risk.
- Participate in the evaluation of proposed system modifications.
- Upon request, evaluate hazard resolutions proposed by other departments.
- Recommend hazard resolutions.

Safety Hazard Identification

Hazard and security threats are identified through different methods of system monitoring. This includes system, employee, and asset assessments conducted daily and on an incremental basis. LTD conducts the following routine and random evaluations of the system in the following departments:

Personnel

LTD employees are evaluated annually to ensure they meet the agency's performance expectations. As part of their orientation process, employees are provided training and tools to perform their job. Employees do not receive permanent status until after completion of 180 days of continuous employment. During the 180 days, employees are evaluated to determine if they are properly prepared to perform their job.

Additional employee evaluations are conducted throughout the year through spot-checks of some aspect of their job function. If through spot-checks or the annual evaluation it is determined the employee's performance does not meet expectations or training standards, remedial training will be provided, and additional evaluations will take place to ensure remedial training was effective.

Assets

Rolling stock, facilities and equipment are monitored through a vigorous preventive maintenance plan aimed at identifying hazards and deficiencies as part of daily and scheduled inspections. Facilities and Maintenance Departments coordinate the preventive maintenance program including incremental and annual inspections.

LTD updates the Federal Transit Administration (FTA)-required Transit Asset Management (TAM) Plan annually with data relevant to each asset to include a condition assessment, miles (with rolling stock and non-revenue vehicles) and age as to whether the asset is in an SGR. The TAM Plan allows LTD management to plan asset replacement or rehabilitation for future years.

System

As part of its safety management system monitoring, LTD uses service evaluations when planning, spot-checking or responding to an event like an accident or incident. New routes are strategically developed with safety being the first priority and passenger access second. LTD route planners plan and test all routes before activating the route for revenue service. All routes are reviewed periodically to determine if environmental hazards may exist requiring modification to the route, schedule, or vehicle.

All front-line staff have been trained to note any changes to service which may be considered a hazard or security threat and, through the Blue Card, notify their supervisors immediately or upon return to LTD, depending on the severity of the hazard.

Hazard Identification Procedure

Any employee seeing something through inspection or observation they deem to be a hazard are instructed to immediately report that hazard to the immediate supervisor regardless of the perceived level of threat. Depending on the situation, either the immediate supervisor or the employee will complete a Blue Card or a Hazard Reporting Card and submit it to Operations or the Chief Safety Officer.

If the hazard requires immediate mitigation, the employee will be instructed on steps to take to reduce the risk, which may or may not alleviate the risk completely. Additional actions may be taken once the immediate risk mitigation has been taken. Some hazards may not pose an immediate risk but are still reported and the CSO will be responsible for risk assessment, investigation and mitigation strategy.

In some cases, a passenger or member of the general public may call LTD with a complaint about a front-line employee, which may rise to the level of hazardous behavior or actions. LTD currently documents all customer complaints/compliments and takes appropriate action to investigate any complaints. Complaints deemed hazardous will trigger immediate action by on-duty supervisors.

The Blue Card and the Hazard Identification Card will require the employee to briefly describe the hazard noting date, time of day, location, and other pertinent information. The Card includes a section for the CSO or immediate supervisor to document immediate action taken to reduce risk, a risk assessment chart prioritizing the risk, and a section for additional follow-up action. All cards will be processed by the CSO, Risk Management Department, and summarized periodically for trend analysis and include in safety performance measures.

49 CFR part 673.5

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.

Safety Risk Assessment

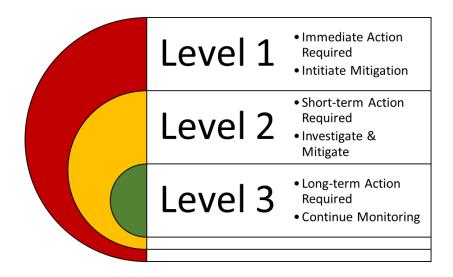
All LTD staff have been provided training appropriate for their positions within the organization. LTD expects its employees to respond to hazards or threats with professional judgment for situations where there is no time to contact a supervisor to prevent and/or address an emergency event. In cases where the hazard can be reported without immediate risk, the employee will make an initial assessment of the risk as part of his or her report.

Once received by the CSO, the initial risk assessment may be amended requiring immediate, short- or long-term response.

Level 1 - Immediate: A deficiency, threat, or hazard requiring immediate attention to mitigate risk either temporarily until further action can be taken or complete mitigation.

Level 2 - Short Term: Action is needed within seven days to mitigate an identified deficiency, threat, or hazard. The deficiency, threat, or hazard does not pose immediate danger, but if no action is taken could elevate to an immediate level risk.

Level 3 - Long Term: A deficiency, threat or hazard has been identified but does not pose a threat currently, but could at a later time. Continued monitoring and awareness are required.



The CSO, in coordination with staff, will investigate each identified hazard, assess the risk, and take appropriate action to mitigate the risk. Additional mitigation may be needed based on follow-up monitoring to the action taken.

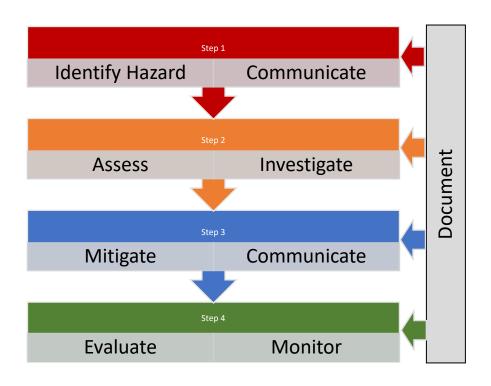
Safety Risk Mitigation

In response to all identified and assessed hazards, LTD will take steps to mitigate the hazard and reduce or eliminate the risk to employees, riders and public. Mitigation strategies will be dependent on the results of investigation into the elements contributing to the risks. The investigation may include more than one department and may include interviews outside of the transit system.

Actions to mitigate risk will include all employees, riders and public who may be impacted by either the hazard or the actions to reduce or alleviate the risk. LTD will communicate actions to appropriate staff through methods of appropriate risk assessment. In some cases immediate communication through two-way communications (dispatch system, text burst, email, or web alert) may be necessary. In other cases bulletin board notices or memorandum posting may be appropriate.

Once a risk mitigation strategy has been implemented LTD will monitor the actions to determine if full mitigation is possible and if not, is additional action necessary to alleviate the risk or is stepped up monitoring necessary. Some risks may not be completely mitigated but awareness of the risk is a top priority.

All actions taken to mitigate risk will be documented and linked to the initial deficiency, threat, or hazard identification step.



Section 6

Safety Performance Monitoring and Measurement

Safety performance monitoring and measurement involves the continual monitoring of the transit agency's activities to understand safety performance. Through these efforts, LTD can determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing Safety Management Systems (SMS).

LTD is constantly striving to maintain the highest level of safety through its monitoring methods to include adherence to policies and procedures, safety and maintenance plans, and system and employee evaluation processes. These methods allow LTD to determine the need to make changes to improve policies, employee training and service delivery.

Maintenance

Maintenance Standards and Procedures. Standards and procedures are included in the Lane Transit District Fleet Maintenance Plan. In general, maintenance procedures are designed to ensure that the maintenance recommendations of the manufacturer are met, maximum efficiency in performance and operation is obtained, and maximum bus life and condition are maintained. Daily bus inspections, an active Preventive Maintenance Program, contractor oversight, and careful monitoring are included in procedures to ensure the safety of buses and adequacy of the Fleet Maintenance Plan.

Operator Inspections. All operators are required to perform a pre-trip and post-trip inspection to ensure that the vehicle is safe and in good operating condition. If any defects are noted by the operator, a Defect Slip is completed and, depending on the severity and extent of the defect, the vehicle may be repaired or taken out of service until a repair can be made. In the case of a defect that develops or is noted once a vehicle is in service, the operator is required to radio the problem to Operations, who will then notify Maintenance.

Daily Servicing and Inspections. The General Service Workers of the Maintenance Department inspect and service every bus used in revenue service each day. The buses are fueled, all fluids are checked, tires and lugs are checked, and the vehicle is inspected for any leaks or unusual noises. The Inside Cleaners clean the bus interiors each day. When a defect is noted, it is reported to the Lead Mechanic or Supervisor on shift so that evaluation and, if necessary, a repair can be effected.

Mileage-Based Maintenance Inspections. All buses receive preventive maintenance inspections (PMI) at designated mileage intervals. Mileages are determined by vehicle and subcomponent manufacturers and real world experience. Oil sampling is performed at each oil change for both engines and transmissions. A description of the schedule and type of inspection and service performed for each bus series is included in the Fleet Maintenance Plan.

Maintenance Inspections of Contracted Providers. LTD contracts for the operation and maintenance of paratransit services. The contractor must ensure that all passenger vehicles and associated equipment are maintained in proper working condition. The contractor is required to implement a maintenance and safety program that includes a preventive maintenance schedule that complies with FTA requirements for preventive maintenance for vehicles. Further, contractors are required to maintain comprehensive maintenance records on each vehicle and provide the information to LTD. The information is reviewed by LTD. In addition, on-site inspections are conducted periodically to verify vehicle condition.

Operations

Facility Monitoring

Formal facility inspections of all LTD facilities and grounds are conducted by members of the Safety Committee. The purpose of the inspections is to identify any unsafe or unhealthy conditions which may exist, and that may require maintenance or modification. Each facility is also visually inspected for compliance with OSHA and local fire codes.

There is at least one member on the Safety Committee from each LTD department. The current 11 committee members include the Risk Manager, the Director of Human Resources and Risk Management, the Director of Transit Operations, the Union Executive Board Officer, the Human Services Transportation Coordinator, the Facilities Services Specialist, a Maintenance Supervisor, Bus Operators (2), Transit Operations Supervisor, and Journey Level Mechanic. All Committee members are trained in Hazard Identification and Accident Investigation. Checklists are used during these inspections.

Frequency

The Safety Committee conducts its safety inspections on a quarterly basis. Journeyman Mechanics and Facilities Maintenance employees look for potential hazards with equipment whenever they are using that equipment. The vehicle hoists, chain pulls, and cranes in the vehicle maintenance shop are inspected annually by contractors. Preventive maintenance of equipment and facilities is performed in accordance with the manufacturer's recommended practice. Hazards are also identified by analyzing work accident trends, through Blue Card Reports, and Hazard Reporting Cards submitted by employees. Both Cards are used by employees to report safety concerns and to make safety recommendations.

Reporting

When deficiencies are noted during quarterly inspections, they are documented and reported to the director of the department in which the safety hazard is located. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor. Blue Cards are routed to the department or director best equipped to evaluate the concern and, when necessary, propose a resolution.

Hazard Resolution

The primary purpose of facility inspections and hazard reporting is to identify conditions that could lead to accidents and losses. In view of this, it is crucial that all departments and employees be involved in the Facility Inspection and the Hazard Identification and Resolution processes. Hazard resolution is

related to the severity of the hazard and the probability and severity of a negative consequence of the hazard.

Follow-up

Corrective action for a confirmed hazard that has been identified by any established process is the responsibility of the director of the department area in which the hazard exists. This includes arranging for the services of other LTD departments or outside parties, as necessary, to eliminate or control the hazard.

The Safety Committee is required to communicate a proposed resolution for any hazard discovered during a quarterly Facility Inspection to the appropriate director. The director then has up to 60 days to resolve the hazard. Severe hazards, with a high probability of a negative consequence, must be resolved within a shorter period.

Documentation

Hazards that have been identified, proposed resolutions, and corrective actions are recorded in hard copy by the Safety Committee and maintained by Human Resources and Risk Management.

All front-line personnel are responsible for monitoring safety and security as part of their respective positions. If a hazard is identified through observation or interaction with customers or the general public, it is reported to the immediate supervisor as well as following LTD's hazard reporting process.

Employee Hazard Reporting

Reporting Cards

Employees can fill out a Hazard Reporting Card which is turned into the HR department and the Chief Safety Officer, talk with a supervisor or the Risk Manager. They can also contact a Safety Committee member which is comprised of union and administrative members. Depending on the severity/risk of the hazard identified, immediate action may be taken, or the input will be brought to the Safety Committee for discussion. Feedback will be provided to the employee on what action, if any, will be taken.

Route/Operations Safety

Employees can fill out a Lane Transit District Blue Card which has categories for Planning, Marketing, Ops, and Facilities. This form allows employees to provide feedback and input to the organization on how to make the system safer and user friendly. The Blue Card is turned into operations where it is logged and directed to the appropriate personnel. Feedback is provided to the employee on any action that is taken.

Safety Events

Accident and Incident Reporting Process

All accidents and loss incidents are to be investigated. LTD's safe driving standards require professional safe performance of all operators. To ensure better than average safety performance, LTD employs the Evergreen Safety Council and Smith System Defensive Driving guidelines to determine whether or not a collision or onboard incident could have been prevented. All personnel operating any LTD vehicle are held to this standard.

The Lane Transit District Operator's Manual and the accident investigation guidelines developed by the Transportation Safety Institute define, by position, responsibilities for accident/incident investigation. The combined manuals establish procedures for accident notification, response, and investigation.

Transit Operations coordinates with outside law enforcement agencies if they investigate an event. Risk Management coordinates with outside insurance providers and provides support among LTD departments and independent investigation to manage LTD liability and claims.

Most accidents and incidents LTD is involved in are relatively minor in severity and are investigated by Operations Field Supervision. Since most accidents involve buses, this section focuses on bus accidents. However, all non-bus accidents and incidents are also investigated.

Notification

Bus Operators are to notify the operations system supervisor anytime an LTD vehicle might have been damaged, anytime an LTD vehicle and another vehicle come into contact, or anytime an instance occurs in where a customer may have been injured. An Operations Field Supervisor will be directed to the scene. Police and ambulance will be dispatched, if necessary.

Note: An Operations System Supervisor will notify additional staff and members of the LTD Leadership Council whenever accident/incident severity or circumstance requires.

At-Scene Procedures

Bus Operators will adhere to the following procedures defined in the Lane Transit District Operator's Manual:

- Assist the injured.
- If blocking traffic, set out reflective triangles.
- Do not move the coach unless required to do so by an Operations Supervisor, fire or police order, or impending danger from traffic.
- Obtain names, addresses, and phone numbers of all witnesses.
- Have all customers sign the customer list.

Operations Field Supervisors are responsible for conducting on-scene investigations of accidents and incidents. Depending on the severity and the nature of the event, various mechanisms will be used for

preserving transient evidence. These may include digital photography, bus video, field sketches, interviews, and observations.

Investigation

An attempt is made to complete the investigation of most accidents within three days. Operations Field Supervisors are required to complete a Supervisor's Report. Operators are required to complete an Accident Information Report. The Supervisor is required to file both reports electronically and attach all relevant media for use by Risk Management. A hard copy of the reports is given to the Transit Operations Manager for review and sign-off.

A Report of Injury Form must be completed if an employee suffers an injury or illness as a result of an accident or incident. An 801 Form must be filed if medical treatment is necessary.

Accident Review Process

Vehicular accidents and incidents are classified as Preventable or Non-Preventable.

Preventable accidents are defined as those accidents that could have been reasonably avoided if the operator had followed all defensive driving techniques as established by the National Safety Council Guidelines, the Evergreen Safety Council, the Five Keys of the Smith System, and/or Transit Operations Procedures and Policies.

After reviewing all related documents and evidence, the investigating Operations Field Supervisor makes an independent preliminary determination of whether the accident was preventable.

The final accident determination is made by the Accident Route Review Committee (ARRC). The committee meets a minimum of once monthly, and is comprised of two union-elected bus operators who have not had a preventable accident for a minimum of two years, a Maintenance Supervisor, a Transit Operations Supervisor, and the Risk Manager, who is responsible for managing the committee's meeting schedule, documentation, and correspondence.

The ARRC follows all policies, procedures, and definitions as established in the Accident Route Review Committee By-Laws. Examples of investigations may include reviews of accident and injury reports, vehicle condition reports, witness statements, employee interviews, accident scene sketches, bus videos, physical evidence, brake test reports, training manuals, and accident site visits. Employees who are not in agreement with the Committee's determination can appeal directly to the ARRC by providing additional evidence and testimony. If the employee is not in agreement with the appeal results, he or she can make a second and final appeal to the General Manager or designee. The General Manager may review all relevant information, interview the employee making the appeal, interview ARRC members, and confer with any available person or resource he or she considers valuable to his or her deliberation.

Hazard Resolution

The primary purpose of the Accident Investigation process is to determine the cause(s) of accidents so that they may be prevented or mitigated in the future. To this end, it is crucial that all relevant departments be appropriately involved in the Process. A serious attempt is made to use lessons learned

through the investigatory process to incorporate hazard resolutions into future procedures, designs, construction, modifications, training, and procurements.

Follow-up

Follow-up in the form of corrective actions is the responsibility of the employee's director. The responsibility may be delegated to the employee's manager, supervisor or CSO.

Any disciplinary action will be assessed using the Transit Operations Disciplinary Standards, the ATU/LTD Working and Wage Agreement, and/or the Administrative Handbook. Disciplinary consequences for accidents may include warnings, suspensions, and discharge.

Training will be provided, in most cases, for employees who have been involved in two preventable accidents within one year. Training and re-training are not disciplinary in nature.

Internal Reporting

The Transit Operations Manager is responsible for ensuring that all accident reports are completed and filed with Human Resources and Risk Management. The Human Resources Technician is responsible for all accident documentation to be processed into a usable form for the ARRC to determine preventability for all accidents. The Risk Manager is responsible for informing key Transit Operations personnel of the ARRC determinations.

Documentation

Transit Operations and Human Resources and Risk Management maintain the accident investigation documentation in the iTrak database. Hard copies of the documentation will also be maintained by Human Resources and Risk Management for a minimum of three years. Human Resources and Risk Management also maintains the complete individual accident records for each employee.

Performance Measures

Through a series of performance measures relative to operations, maintenance, and safety, LTD can monitor the system's safety by identifying trends and gaps in policies, procedures, training, and monitoring efforts. The following performance measures are on a daily, monthly, and quarterly basis.

Maintenance

- **Preventive Maintenance On-time Inspection Percentage** determines the effectiveness of the maintenance department to ensure all inspections are conducted per manufacturing and LTD mileage intervals.
- Vehicles Removed From Revenue Service tracks vehicles removed from service due to
 a mechanical defect developed while in service requiring immediate service either onsite of failure or once returned to the facility.
- Annual Vehicle Condition Assessment through annual inspection, determines on a scale of 1-5 the overall condition of the asset. This performance measure is also used in annual updates of LTD's Transit Asset Management Plan.

Operations

- **Customer Complaints Per Month** tracks all customer complaints to identify areas of deficiency with vehicle, driver or other LTD areas. Safety-related complaints are immediately routed to a supervisor on-duty or the CSO for investigation mitigation and response.
- **On-time Performance** serves as an indicator to issues with time management, environmental factors, scheduling, and vehicle and driver performance.
- On-board Surveys conducted annually, allow LTD to receive rider feedback about bus operator performance, customer service, and vehicle safety.

Safety

- Safety Performance Measure: Fatalities (total number of reportable fatalities and rate per total vehicle revenue miles by mode)
- Safety Performance Measure: Injuries (total number of reportable injuries and rate per total vehicle revenue miles by mode)
- Safety Performance Measure: Safety Events (total number of reportable events and rate per total vehicle revenue miles by mode)
- Safety Performance Measure: System Reliability (mean distance between major mechanical failures by mode)

7. Safety Promotion

Operator Selection

Hiring Practices

Selecting applicants best suited to excel at the Bus Operator job requirements is critical to safe transit operations. The transit Bus Operator is directly responsible for the safety of not only the passengers, but also the pedestrians, bicyclists, drivers, and all others who share the road with the transit vehicle. LTD's hiring process includes the following components:

Applications

Applicants are sought through postings in traditional and culturally diverse media, postings distributed to other transit districts in the region, referrals from current employees, and interest cards filed by prospective candidates when there are no positions available. The applications are screened by key personnel in Human Resources and Risk Management and Transit Operations.

Video Testing

A two-section video test developed by Ergo Metrics is administered to applicants whose applications were acceptable. The People Sense section of the test uses transit-specific scenarios to evaluate the applicant's interpersonal skills and ability to de-escalate potentially dangerous onboard situations. The Start Driving section evaluates an applicant's ability to make safe driving choices by evaluating the surrounding traffic environment while processing passenger contacts and distractions. An on-line survey called Step One Survey is also administered. It is designed to evaluate the character, integrity, and truthfulness of employment candidates.

Interview

The most highly rated and desirable applicants passing the video testing are then interviewed by a panel comprised of an Operations Supervisor, an Operator/Instructor, and an HR or other administrative staff person. The interview process is designed to evaluate a candidate's strengths in customer service, the ability to simultaneous perform tasks, conflict resolution, and the ability to perform well under temporal and interpersonal pressure.

Driving Record

To be eligible for hire, a candidate must submit an acceptable driving abstract dating back five years. This establishes 21 years as the de facto minimum age requirement for new hire Bus Operators.

Licensing

To be eligible for hire, a candidate must be able to earn a Class B Oregon CDL with a Passenger and Air Brake Endorsement.

Criminal Background Check

To be eligible for hire, a candidate must submit to a Criminal Background Check administered by the Oregon State Police with the Federal Bureau of Investigation. The results must meet all statutory and LTD standards for the Bus Operator position.

Drug Testing

To be eligible for hire, a candidate must produce a negative result for a pre-employment drug test.

Physical Capacities Testing

To be eligible for hire, a candidate must pass a position-specific physical capacities test.

Training

There are formal training programs for Bus Operators, Maintenance employees and Operations Supervisors. These include training classes, manuals, LTD Standard Operating Procedures, and on-the-job training.

The safety component of training is designed to make employees aware of the hazards associated with their jobs and the appropriate methods for controlling these hazards. The training is intended to motivate employees to work safely. Trainings fall into three main categories: (1) Initial, (2) Periodic, and (3) Retraining or Refresher.

Journey Level Mechanic

Almost all mechanics are hired as "fully qualified journey level" heavy vehicle mechanics. A hiring panel comprised of several Maintenance personnel and a member of Human Resources and Risk Management evaluates candidates based on their background and interview. The panel determines whether a candidate meets the qualifications of a Journey Level Mechanic.

A Maintenance Training Program has been implemented, and two General Service Workers, possessing excellent prerequisite skills, have been trained and promoted to the Journey Level Mechanic position since the start of the Training Program.

Critical Bus Maintenance Safety Systems

Journey Level Mechanics who are hired may have extensive transit bus experience, but often they have experience maintaining heavy-duty vehicles with no transit bus experience. To ensure the safety of the buses being repaired, new Journeyman Mechanics are monitored by fully experienced Mechanics in each critical safety maintenance area to ensure that they can perform the work independently. The following are considered critical safety maintenance areas:

- Service and Parking Brakes
- Air Systems
- Interlock Systems
- Steering Systems
- Suspension Systems
- Tires, Wheels, and Rims
- Exterior Lights, Signals, Mirrors, and Wipers
- Wheelchair Lifts/Ramps
- Weekly Pit Inspections
- Fuel and Exhaust Systems

Core Vehicle Systems Training

Recently-hired Mechanics also receive other core technical training. This training is provided by a Mechanic Instructor. Training in the following areas is considered core technical training:

- Basic Electrical Systems
- Electronic Systems Training
- Diesel Engine Tune-up (Cat, Cummins, Detroit Diesel Series 50)
- Engine Systems (Cat, Cummins, and Detroit Diesel electronic controls)
- Transmission Preventive Maintenance and Troubleshooting (Allison and Voith)

New Equipment Training

Initial new equipment training is given three to six months after the equipment is added to the fleet. The Mechanics have the opportunity to familiarize themselves with the equipment before receiving the specific training. When new equipment is complex, the initial training may be followed in the future by additional refresher training. The Lead Mechanics and Maintenance Supervisors determine the need and timing of the secondary training and then request that the Director of Maintenance arrange the training.

Tracking Maintenance Training

The Human Resource Generalist has worked with the Maintenance Department on the development of a tracking system for maintenance training. In conjunction with this effort the Maintenance Technical Supervisor has developed a set of maintenance-specific LTD standard operating procedures and sign-off sheets for specific tasks and skills.

Initial Bus Operator Training

New Bus Operators receive an intensive six-week training course that covers every aspect of their new job. Some components of the training are delivered in the classroom. The majority of learning occurs on the buses during off-route and on-route training. The training includes, but is not limited to, the following areas:

- Smith System of Driving
- Orientation to Lane Transit District
- Basic Bus Maneuvers
- Advanced Bus Maneuvers
- Service Stops
- System Overview
- System Procedures
- Communication skills
- Customer Service
- Accessible Service
- Emergency Management
- Fleet Services
- Personal Safety
- Health/Injury Prevention

- Stress Management
- CDL Preparation
- On-route Training (14 Days)

On-route training provides real service experience with an Operator Instructor on the new operator's regularly scheduled work. The time the student operates the revenue route is increased daily. Each day the student receives a full review and debriefing from his or her instructor. Instructors communicate among one another regarding where additional training for new operators is required. Student rotation among the Operator Instructor group provides each student with experience across a variety of routes, vehicles, times of day, instructional styles, and driving conditions.

After the initial training, new Bus Operators receive additional support and training, including:

- The Mentor Program: Operator Instructor mentors and supports the new Bus Operator during the first year
- Check-rides at the following intervals: one week, two months, four months, six months, nine months, and twelve months
- Four-Week Follow-up: Procedure and Policy Review
- Fall Bad Weather: Driving and Defensive Driving Course (DDC)
- One-Year Follow-up: Debriefing with Operations Training Supervisor and safety review with Human Resources and Risk Management
- Two-Year Follow-up: DDC
- Three-Year Follow-up: Dealing with Difficult People
- Four-Year Bus Operators are invited to become secondary mentors to new Bus Operators

Annual Training For All Bus Operators

Every year, each Bus Operator receives one full day of refresher and topical training. The training addresses, but is not limited to, the following topics:

- Fatigue Awareness
- Stretching to Prevent Injuries
- Healthy Eating on a Tight Schedule
- Dealing With Difficult People
- Resolving Conflict
- Breath Awareness for Controlling Stress
- Harassment
- Effectively Dealing With People of Differing Ages
- Proper Securement of Mobility Devices
- Defensive Driving Course
- Bloodborne Pathogens
- Safety/Security Update
- Injury Prevention
- Transit Spanish

Accessible Service Sensitivity

Partial-day trainings are also scheduled on safe winter driving and whenever warranted by the addition of new equipment or a change in configuration.

Initial Operation Supervisor Training

Transit Operations Supervisors begin their career path, almost exclusively, as Bus Operators who first work in the position of Temporary Supervisor. A Temporary Supervisor performs many functions of the full supervisory position and receives training in, but not limited to, the following areas:

- Drug & Alcohol (Policy and procedures for all types of FTA-mandated testing)
- Accident Investigation (based on the TSI model)
- Emergency Procedures
- Security Procedures
- On-the-job Injury Claims
- Blood Borne Pathogens
- Data Entry and Recordkeeping
- Harassment
- Cultural Diversity
- Coaching/Criticism/Discipline
- Dispatch Operations
- Field Operations
- First Aid and Defibrillator
- Basic Writing
- Self Defense
- Conflict Resolution
- Pepper Spray

In addition to their initial training, all Transit Operations Supervisors receive five full days of refresher and topical training annually.

Injury and Illness Prevention Training

Injury and Illness Prevention Training is directed toward achieving a safe working environment for all employees and reducing the chance of occupational-related injuries and illnesses. The majority of training targets employees working in the Maintenance and Facilities Maintenance Departments because these employees have the greatest exposure to occupational hazards. The program is based on applicable Federal, State, and local safety codes and regulations. Some areas addressed in training include:

- Handling Hazardous Materials (Right to Know)
- Slips, Trips, and Falls
- Personal Protection Equipment
- Safety Data Sheets (SDS) and Labels
- First Aid
- Forklift Safety
- Bloodborne Pathogens
- Hazardous Materials Storage

- Strains and Sprains
- Fall Protection
- Confined Space Program
- Crane Operation
- Ergonomics
- Hazard Communication Program

Emergency Response Planning and Coordination

Details are contained in the Lane Transit District Emergency Preparedness and Security Plan (EPSP).

System Modification Design Review and Approval

General Process:

The LTD bus system is regularly modified in response to operational experience, the addition of new types of service, and changes in service design and levels. LTD's philosophy is to utilize appropriate new technologies to benefit the environment and the community it serves. The challenge is to review any proposed modification adequately before it is approved. Any proposed modification should be evaluated to ensure it is compatible with existing systems and does not introduce new hazards to the system or reduce the effectiveness of existing hazard controls.

Equipment modifications may be proposed by any employee of any department that uses the equipment. Changes may also occur from an analysis of reliability performance, historical data, and available improvements in equipment design and components.

Modification Design Review

A review of any modification in equipment design shall be made by the director and managers of the department responsible for the equipment. It is an informal practice to include Human Resources and Risk Management in the review of any change that might affect safety. The impact on the safety of all designs and specifications should be identified and evaluated before the change is approved. Some of the areas to be considered include but are not limited to:

- Hazardous Materials (handling and use)
- Motor Vehicle Safety
- Human Factor
- Occupational Health and Safety
- Materials Compatibility
- Fire Protection
- Lighting
- Braking systems
- Mirrors
- Warning Devices

Modifications must not be made before it is determined how they might affect the safety of the system, or any other systems. Other departments may evaluate a proposed change to determine its compatibility with other systems (e.g., hoists, fueling systems, communications systems). The evaluation may also include a review of applicable regulations, such as the Federal Motor Vehicle Safety Standards and Regulations and the U.S. Department of Labor's Occupational Safety and Health Act.

Testing may also be performed to evaluate the safety of a proposed modification. The testing of small changes may be minimal. For substantial modifications, extensive field testing, mock-ups, and structural evaluations may be employed.

Modification Design Approval

Final approval is generally made by either the Director of Operations or the Director of Planning and Development. When modifications are made by a bus manufacturer, the Director of Maintenance works with the manufacturer, and contractual changes may be made.

Monitoring

Once a modification is put in place, feedback from the operating department is solicited to evaluate the performance of the modification. Unsolicited input from the operating department and its employees (end users) is also encouraged. Depending on the nature of the modification, Human Resources and Risk Management, the Safety Committee, and the Accident Route Review Committee may also be involved.

Documentation

The Maintenance Department is responsible for documenting any vehicle modifications. Facilities Services is responsible for documenting any modifications made to a facility. Documentation may involve changing diagrams, schematics, manuals, service bulletins, service intervals, standard operating procedures, and Safety Data Sheets. The Risk Manager is responsible for updating Safety Data Sheets based on input from product manufacturers and various LTD Departments.

Routes

Route modifications are designed by Service Planning, Accessibility, and Marketing. The Service Planning Manager and a Service Planner are former operators who maintain a current CDL. They are qualified to drive various buses outside of revenue service to evaluate routing changes.

Service Planning may also use a current Bus Operator to test routing and bus stop placement. This experience-based, real-world process is designed to protect the safety of the transit bus, transit passengers, other vehicles, and pedestrians.

Service Planning informs the Accident Route Review Committee of any proposed route modifications. Service Planning can request that the Committee evaluate a specific proposal, or the Committee can choose to evaluate any proposed modifications.

Transit operations management may request a route modification it believes will improve operations. It may also choose to evaluate a modification that has been proposed by another department. Input from individual Bus Operators is encouraged through the Blue Card System, an open-door policy, and periodic surveying of Operators conducted by Service Planners.

Finally, Service Planning maintains a cooperative working relationship with the appropriate planning and road departments of all municipal levels of government within which LTD operates.

Additional Information

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

- Lane Transit District System Safety Program Plan 2012
- Lane Transit District Employee Handbook
- LTD Board of Directors Resolution #2016-12 Adoption of Safety Conscious Environment

HA CTI	SAFETY COMM AZARD REPORTI	R	eport Card# ate Received
Name:	Dept:	Date:	
Location of hazard:			
Is it Permanent Temp	porary Date/Time hazard was		
	id not fall, saw it just in time to avoid		
Additional Comments:			
	Use back of card for additional de	etails/response	
Outcome:	By Whom:	Date:	

	Lane Transit District Blue Card
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DO NOT WRITE IN THIS BOX	
BLUE CARD #	
DATE:	

FROM:		DATE:	
PROBLEM: (Describe details b	pelow)		
PLANNING BUS STOP ISSUE DRIVER TIMECARD LAYOVER / DROPOFF / RELIEF RUNNING LATE / EARLY TREES IN OPERATOR MANUAL OTHER / SUGGESTION	MARKETING ANNOUNCEMENT / DESTINATION SIGN INFORMATION AT BUS STOP / STATION PUBLIC INFORMATION OTHER / SUGGESTION	OPS TREE TRIMMING SAFETY HAZARD OTHER / SUGGESTION	FACILITIES DOWNED / MISSING LTD SIGN SHELTER / BUS STOP / STATION DAMAGE TRASH OTHER / SUGGESTION
BLOCK #	RUN #	ROUTE #	ПВ □ов
DESCRIPTION:			
SUGGESTIONS:			
ADDITIONAL COMMENTS:			
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