City of
New Braunfels

Agency Safety Plan

Version 1.0

The Agency Safety Plan (ASP) is approved and signed by the accountable executive.

Signed: _____   Date _____
Robert Camareno, City Manager

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Introduction

In compliance with MAP-21 and the FAST Act, FTA promulgated a Public Transportation Safety Program on August 11, 2016, that adopted Safety Management Systems (SMS) as the foundation for developing and implementing a Safety Program. There are several components of the national safety program, including the National Public Transportation Safety Plan (NSP), that FTA published to provide guidance on managing safety risks and safety hazards. One element of the NSP is the Transit Asset Management (TAM) Plan. Public transportation agencies first implemented TAM plans across the industry in 2018. The subject of this document is the Public Transportation Agency Safety Plan (PTASP) rule, 49 CFR Part 673, and guidance provided by FTA.

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. All levels of management, administration, and operations are responsible for the safety of their clientele and themselves. To ensure the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the NSP, the New Braunfels City Council adopts this ASP and the tenets of SMS including a Safety Management Policy and the processes for Safety Risk Management, Safety Assurance, and Safety Promotion, per 49 U.S.C. 5329(d)(1)(A).[1] While safety has always been a primary function at the City of New Braunfels, this document lays out a process to fully implement SMS that comply with the PTASP final rule and consequent updates.

The New Braunfels Transit District is operated by the City of New Braunfels and governed by the New Braunfels City Council. The mayor and council members function as the policymaking body of the City's government, determining the overall goals, objectives, and direction for City services and adopting the annual operating budgets for all City departments. Day-to-day operations of New Braunfels are the responsibility of the City Manager.

The transit system serves the public within the City of New Braunfels city limits and adjacent areas of the unincorporated county as defined in its service area map. The City is recognized as an Urban Transit District (UTD) by the State of Texas. At this time, the City of New Braunfels does not have any vehicles, facilities or other property purchased with Federal Transit Administration (FTA) funding but is in the process of establishing direct recipient status. The City of New Braunfels is defined by Federal legislation as a Tier II provider with less than 100 vehicles in both the fixed-route revenue service and the general demand response service during peak hours.

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[1] Federal Register, Vol. 81, No. 24

Section I: Safety Management Policy

Policy Statement

The City of New Braunfels (City) recognizes the management of safety is a core value of our business. The management team at the City will embrace the SMS and is committed to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our employees, customers, and the general public. All levels of management and frontline employees are committed to safety and understand that safety is the primary responsibility of all employees.

The City is committed to:

- Communicating the purpose and benefits of the SMS to all staff, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.

- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.

- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.

- Ensuring that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.

- Establishing safety performance targets (SPTs) that are realistic, measurable, and data driven.

- Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.

Safety Performance Targets

The PTASP Final Rule, 49 CFR Part 673.11(a)(3), requires that all public transportation providers must develop an ASP to include SPTs based on the safety performance measures established under the NSP. The safety performance measures outlined in the NSP were developed to ensure the measures can be applied to all modes of public transportation and are based on data currently being submitted to the NTD. The National Public Transportation Safety Plan identifies 14 safety performance measures for all transit providers subject to the PTASP regulation. Each is required to be reported by mode as presented in Table 1. Table 2 presents the baseline and target numbers for each performance measure.

Table 1: NSP Safety Performance Measures

Safety Performance Measure	Description
Measure 1a – Major Events	This includes all safety and security major events as defined by the NTD.
Measure 1b – Major Event Rate	This includes all safety and security major events as defined by the NTD, divided by VRM.
Measure 1.1 – Collision Rate	This includes all collisions reported to the NTD, divided by VRM.
Measure 1.1.1 – Pedestrian Collision Rate	This includes all collisions "with a person," as defined by the NTD, divided by VRM.
Measure 1.1.2 – Vehicular Collision Rate	This includes all collisions "with a motor vehicle," as defined by the NTD, divided by VRM.
Measure 2a – Fatalities	This includes all fatalities as defined by the NTD.
Measure 2b – Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.
Measure 2.1 – Transit Worker Fatality Rate	This includes all transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.
Measure 3a – Injuries	This includes all injuries as defined by the NTD.
Measure 3b – Injury Rate	This includes all injuries as defined by the NTD, divided by VRM.
Measure 3.1 – Transit Worker Injury Rate	This includes all transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.
Measure 4a – Assaults on Transit Workers	This includes all assaults on transit workers as defined by the NTD.9
Measure 4b – Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by the NTD,9 divided by VRM.
Measure 5 – System Reliability	This includes Major Mechanical System failures as defined by the NTD.

Table 2: Demand Response Safety Performance Targets

Mode	Baseline	Target
Fatalities	0.0	0.0
Rate of Fatalities*	0.0	0.0
Injuries	1	0.9
Rate of Injuries*	0.26	0.23
Safety Events	1.0	0.9
Rate of Safety Events*	0.26	0.23
Mean Distance Between Major Mechanical Failure	162,363	146,126.7
Collision Rate	0	0
Pedestrian Collision Rate	0	0
Vehicular Collision Rate	0	0
Transit Worker Fatality Rate	0	0
Transit Worker Injury Rate	0	0
Assaults on Transit Workers	0	0
Rate of Assaults on Transit Workers	0	0

*rate per 100,000 vehicle revenue miles

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

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

through the City of New Braunfels's annual Certifications and Assurances reporting to FTA.

The safety performance targets are made available to Alamo Area Metropolitan Planning Organization (AAMPO) or other state and federal agencies. The City will share annual target updates with AAMPO and the State DOT through meetings and emails as part of the Transportation Improvement Program (TIP) process. This information is also available to City Officials, Managers, and other City Staff on the transit website.

As more data is collected, the City will adjust the safety performance indicators to help inform management on safety related investments.

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

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

Table 2: ASP Annual Update Timeline

Task	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept
Review Agency Operations	→							
Review SMS Documentation • *Safety Policy* • *Risk Management* • *Safety Assurance* • *Safety Promotion*		→						
Review Previous Targets and Set or Continue Targets			→					
Report Targets to National Transit Database (NTD), TxDOT, New Braunfels Area MPO					→			
Make Any Necessary Adjustments to PTASP							→	
Update Version No., Adopt & Certify Plan Compliance								★

Maintenance of the ASP

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

The following table, Table 6, will be used to record final changes made to the ASP during the annual update. This table will be a permanent record of the changes to the ASP over time. The implementation of SMS is an ongoing and iterative process, and as such, this PTASP is a working document. Therefore, a clear record of changes and adjustments is kept in the PTASP for the benefit of safety plan performance management and to comply with Federal statutes.

Table 3: ASP Record of Changes

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

Accountabilities and Responsibilities

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

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

Executive Level Management are those members of our agency leadership or executive management, other than the Accountable Executive, who have authority or responsibility for day-to-day implementation and operation of our agency's SMS. Julie Sitton, Transit Services Coordinator/Manager, serves the function of **CSO** for the transit district, as an adequately trained individual who has the authority and responsibility as designated by the Accountable Executive for the day-to-day implementation and operation of the City's SMS. As such, the CSO can report directly to our transit agency's Accountable Executive.

Technical Level Management include staff, groups of staff, or committees to support the Accountable Executive, CSO, or SMS Executive in developing, implementing, and operating our agency's SMS, including but not limited to the Transit Services Coordinator/Manager.

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

The City will be reviewing and modifying, if necessary, our current job descriptions to ensure the job descriptions comply with 49 CFR Part 673. It is the intent of the City to review, update, ensure compliance and deliver a job description to employees annually.

SMS Documentation

At all times, the City will maintain documents that set forth our ASP, including those documents related to the implementation of the City's SMS and those documents related to the results from SMS processes and activities. The City will also maintain documents included in whole, or by reference, describing the programs, policies, and procedures our agency uses to carry out our ASP and all iterations of those documents. These documents will be made available upon request to the FTA, other Federal entity, or TxDOT. The City

will maintain these documents for a minimum of three years after the documents are created. These additional supporting documents will be cataloged in Appendix A as developed and the list will be kept current as a part of the annual ASP review and update.

Section II: Safety Risk Management

Under the requirements of 49 CFR Part 673.25(a), transit agencies must develop and implement a Safety Risk Management (SRM) Process for all elements of the system.

The SRM process consists of the following activities:

• Safety Hazard Identification

• Safety Risk Assessment

• Safety Risk Mitigation

The City's formal safety risk management system incorporates these requirements to identify all existing and foreseeable hazards, identify reasonable consequences of those hazards that may result in adverse events, analyze those consequences to evaluate the risk, and establish controls to manage those risks to the lowest practical level. SRM encompasses the use of safety analysis tools by adequately staffed and trained personnel, as well as the use of Subject Matter Experts (SMEs) wherever appropriate and necessary. Under the DOSS' guidance, department heads are responsible to ensure hazards are identified, analyzed, properly mitigated, and documented.

In addition, the SRM process at the City is integrated with its safety assurance program to ensure safety risk mitigations are evaluated for effectiveness over time, by following the general processes defined below and combined with Safety Assurance processes described in Section III.

Hazard Identification

All employees and contractors are required to identify, report, and work with the CSO and key staff to identify methods to mitigate hazards as appropriate. The CSO participates in helping to confirm mitigation is appropriate for the hazard as identified. The CSO will confirm mitigations have been completed and documented in accordance with identified requirements including those items delegated to others including the City staff, contractors, subject matter experts or others. The process includes reporting assaults on transit workers, near-misses, and unsafe acts and conditions.

Hazard Identification Sources

There are a variety of sources for hazard identification. The City uses the following sources for hazard identification:

- **Reactive hazard identification** involves analysis of events or outcomes that have already occurred. Hazards are identified through investigation of safety occurrences (including close calls), adverse events, and hazard reporting from the field (such as rules compliance activities, safety committee meetings and customer reports) where adverse outcomes have been experienced on the system.

- **Proactive hazard identification** involves effective implementation of the safety assurance function through departmental inspections, reviews, evaluations, observations, and assessments; proper change management; quality assurance programs; failure trend analysis; and the employee and contractor safety reporting programs. This involves actively seeking to identify hazards and mitigating them effectively before adverse events occur.

- A specialized subset of proactive risk-based analysis and inspections is **predictive identification**, which involves the thorough and timely analysis of safety data collected by all departments to identify possible negative future outcomes or events; as well as monitoring the system in real time.

- **Data and information** from FTA and other Federal or State agencies regarding industry experience, best practices and lessons learned, including the Centers for Disease Control and Prevention and local health departments to minimize exposure to infectious diseases.

- **Safety Hazard identification** offers the City and contractors the ability to identify hazards and potential consequences in the operation and maintenance of our system.

Employee Safety Reporting Program

Frontline employees are a significant source of safety data. These employees are typically the first to spot unsafe conditions that arise from unplanned conditions either on the vehicles, in the maintenance shop, or in the field during operations. For this reason, the Employee Safety Reporting Program (ESRP) is a major tenet of the PTASP Rule. Under this rule, agencies must establish and implement a process that allows employees to report safety conditions directly to senior management; provides protections for employees who report safety conditions to senior management; and includes a description of employee behaviors that may result in disciplinary action. All negative safety conditions or incidents involving safety will be reported to the Transit Services Coordinator and will then follow up with the process of evaluating the incident and report findings to the CSO or SMS Executive. The employee, in turn, can report the negative safety condition or incident directly to the CSO.

The City will be developing a reporting policy, which will extend to all contractors operating services, as well as be applicable to complainants within the city. According to the document, all employees are required to recognize and report any unsafe condition,

hazard, or faulty equipment to the employee's supervisor as soon as the employee becomes aware such a situation exists. Over the next year, the City will develop our reporting procedures into a full ESRP to ensure the procedures comply with 49 CFR Part 673.

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

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

Hazard Investigation
Hazards will be investigated by the City and its contractors as they are reported or identified in accordance with hazard investigation procedures. All investigatory activities will be properly documented. The purpose of investigation is to evaluate the hazards in terms of reasonable consequences (especially in the case of proactive identification); and to examine the frequency and severity of the consequences. Once these have been established, the safety risk index can be identified. If the hazard is currently mitigated, investigation involves assessment to establish if current mitigations are sufficient to address associated risk, or if changes or additional mitigations are warranted to further reduce risk. Once the investigation activities have been completed, risk may be assessed.

Safety Risk Assessment
As part of the SRM process, the City and its contractors will develop methods to assess the likelihood and severity of the consequences of identified hazards, and prioritize the hazards based on the safety risk. The investigation procedure and framework will be developed to cover all risk assessment. These procedures will be used to investigate risks identified from multiple sources, including the ESRP. Risk assessment is performed by measuring the likelihood of consequences occurring and the seriousness of the consequences if they do occur, as illustrated below.

There are five steps to effectively assessing safety risk:

1. Assess the hazard's likelihood of occurring.

2. Assess the hazard's severity.

3. Assess the current safety risk mitigations, if any are in place, and determine if revised or additional mitigations are necessary.

4. Index the safety risk based on likelihood and severity analysis of the consequences.

5. Determine risk acceptability based on the guidance provided per the risk index.

Table 4 - Severity Criteria, Risk Safety Assessment

Category	Consequences
Category 1, Catastrophic	Could result in one or more of the following: multiple deaths, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding $10M.
Category 2, Critical	Could result in one or more of the following: death, permanent partial disability, injuries, or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding $1M but less than $10M..
Category 3, Marginal	Could result in one or more of the following: injury or occupational illness resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding $100K but less than $1M.
Category 4, Negligible	Could result in one or more of the following: injury or occupational illness not resulting in a lost workday, minimal environmental impact, or monetary loss less than $100K.

From Appendix B, Standard Matrix, FTA Sample Safety Risk Assessment Matrices for Bus Transit Agencies (September 2019) Sample Safety Risk Assessment Matrices for Bus Transit Agencies (dot.gov)

Table 5 - Likelihood Criteria – Risk Safet Assessment

Description	Level	Likelihood	Result
Frequent	A	Likely to occur often in the life of the item.	Continuously experienced
Reasonably Probable	B	Will occur several times in the life of the item.	Will occur frequently
Occasional	C	Likely to occur sometime in the life of an item.	Will occur several times
Remote	D	Unlikely, but possible to occur in the life of an item.	Unlikely but can reasonably be expected to occur
Improbable	E	So unlikely, it can be assumed occurrences may not be experienced in the life of an item.	Unlikely to occur, but possible
Eliminated	F	Improbable, condition mitigated.	N/A

From Appendix B, Standard Matrix, FTA Sample Safety Risk Assessment Matrices for Bus Transit Agencies (September 2019) Sample Safety Risk Assessment Matrices for Bus Transit Agencies (dot.gov)

Safety Risk Assessment Matrix

The first chart below is a matrix combining Severity rankings with Likelihood rankings. The next chart, the Risk Assessment Index, is then used to define the acceptability of risk.

Figure 1 - Safety Risk Assessment Matrix

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

Safety Risk Mitigation

Safety Risk Mitigations are methods or processes to manage risk system-wide. Once risk is identified, the City and its contractors must ensure it is not accepting increased risk without the proper level of management decision, nor misallocating safety resources if existing mitigations are sufficient. Strategic decisions are made to ensure risk is reduced to the lowest practical level. The general risk mitigation strategy in place at the City is the following:

- **Avoid:** Avoidance removes the undesired consequence, such as canceling or delaying the operation or activity until risk is appropriately mitigated.

- **Reduce:** Risk reduction is the application of mitigations to reduce probability or severity to an acceptable level. It is noted here that it is rarely possible to reduce severity without engineering or operational configuration changes (such as speed reduction, reduction in vehicular and pedestrian accidents, mitigation of assaults on transit workers, minimize exposure to infectious diseases, etc.).

- **Segregate:** Segregation limits the exposure of people, assets, operations, or activities to the consequences of the identified hazards.

The hierarchy of mitigation follows these basic steps:

1. Design out the hazards.

2. Install safety devices.

3. Use warning systems.

4. Administrative (rules, procedures, training)

5. Personal Protective Equipment (PPE)

Criteria the City may use to identify when mitigations or strategies may be necessary to reduce the likelihood or severity of consequences are:

1. Identification of risk level acceptability

2. Cost-benefit analysis

3. Availability of technology

4. Changes to procedures, rules, or training

5. Service changes

Each level of employee will be trained to respond to hazards appropriate to their level of authority and responsibility. Front line employees (and contractors) must be trained, over time, to recognize hazards, report them, and suggest strategies for mitigation, such as corrective maintenance, avoidance of collisions, stop hazardous work, use of PPE, rules compliance, use of Incident Command, setting up barriers, etc. Managers will be trained to respond to hazard reports, deploy resources at their disposal to address and mitigate hazards under their control; and when additional resources are needed, inform executive management in a timely manner of the need for additional resources and why. Executive management will allocate resources based on risk, and if resources are not available, ensure that no activities take place until risk is mitigated to an acceptable level.

Section III: Safety Assurance

Safety Assurance means processes within the City's SMS function to ensure the implementation and effectiveness of safety risk mitigation. Safety Assurance also ensures that the City meets or exceeds our safety objectives through the collection, measurement, analysis and assessment of information. Safety Assurance helps to ensure early identification of potential safety issues. Safety Assurance also ensures that safeguards are in place and are effective in meeting critical the City's critical safety objectives and contribute towards SPTs.

Safety Performance Monitoring

As the first step in the City's Safety Assurance program, the City and its contractors collect and monitor data on safety performance indicators through a variety of mechanisms. Safety performance indicators can provide early warning signs about safety risks. The City will adopt a set of leading indicators that monitor conditions that are likely to contribute to negative outcomes in the future. In addition to the day-to-day monitoring and investigation procedures, the City will review and document the safety performance monitoring and measuring processes as part of the annual update of this ASP.

Compliance and Procedures

The City monitors our system for personnel compliance with operations and maintenance procedures and monitors these procedures for sufficiency in meeting safety objectives. Supervisors monitor employee and contractor compliance through direct observation and review of information from internal and external reporting systems from both employees and contractors.

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

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

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

Safety Event Investigation
49 CFR Part 673.27(b)(3) requires the transit agency to establish activities described in the agency safety plan to conduct investigations of safety events to identify causal factors. The City is committed to applying the "Organizational Approach;" that is, all investigations will seek to identify causal factors associated with the organization instead of simply blaming the person closest to the event. The CSO will ensure that all New Braunfels employees and contractors identified as critical to the investigation will fully cooperate in any investigation, regardless of which agency conducts it.

Internal investigations of all FTA-defined events may be led by the CSO or delegated to key staff, SMEs, or contractors. Corrective actions to address risk, non-compliances or deficiencies in SMS, practical drift or other defects in the safety program must be developed and reviewed by the CSO for consistency with the adopted safety plan.

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

Leading Indicators
Because leading indicators can be more useful for safety performance monitoring and measurement than lagging indicators, the City will make efforts to implement processes to identify and monitor more leading indicators or conditions that have the potential to become or contribute to negative safety outcomes. This may include trend analysis of

environmental conditions through monitoring National Weather Service data; monitoring trends toward or away from meeting the identified SPTs; or other indicators as appropriate.

Section IV: Safety Promotion

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

Competencies and Training

The City provides comprehensive training to all employees regarding each employee's job duties, general responsibilities, and industry standards. This training includes safety responsibilities related to the employee's position. In addition, regular safety meetings are held by transit staff and contractors to ensure that safety-related information is relayed to the key members of our agency's safety processes.

As part of SMS implementation, the City will conduct the following activities:

- Review staff categories (administrative, driver, supervisor, mechanic, maintenance, etc.) and the respective staff safety related responsibilities.

- Assess FTA training requirements and courses required for different positions, including the training material available on the FTA PTASP Technical Assistance Center website.

- Review other training material available from industry sources such as the Community Transportation Association of America and the American Public Transportation Association websites.

- Develop a set of competencies and trainings required to meet the safety related activities for each general staff category.

- Develop expectations for ongoing safety training and safety meeting attendance.

- Develop a training matrix to track progress on individuals and groups within the organization.

- Safety concern identification and reporting training.

- Adjust job notices associated with general staff categories to ensure that new personnel understand the safety-related competencies and training needs and the safety-related responsibilities of the job.

- Include refresher training in all trainings and apply it to agency personnel and contractors.

- Contractors will be required to provide de-escalation training for frontline staff to mitigate & identify and report potential operator assaults and increase overall safety of the system.

Safety Communication

The City and its contractors regularly communicate safety and performance information throughout our transit system that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through the ESRP or other means.

The City or its contractors report safety related information to the New Braunfels City Council at their regular meetings, including safety performance information. In addition, The City, or its contractors, hold regular meetings with operators to ensure that any safety related information is passed along that would affect the execution of the operators' duties. The City and its contractors also post safety related and other pertinent information in a common location for all employees.

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

- What information does this individual need to do their job?

- How can we ensure the individual understands what is communicated?

- How can we ensure the individual understands what action must be taken as a result of the information?

- How can we ensure the information is accurate and kept up to date?

- Are there any privacy or security concerns to consider when sharing information? If so, what should we do to address these concerns?

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

Cooperation with Frontline Employees

Per the Bipartisan Infrastructure Law changes to 49 U.S.C § 5329(d), the ASP will be developed in cooperation with frontline employee representatives. Each ASP update will include frontline employee representatives in the development team for input on the SMS, annual safety performance targets, and safety policy. The ASP will be reviewed by frontline staff before it is adopted. The ASP will be maintained in coordination with the contractor, and electronic and hard copies will be available to transit-related employees.

Acronyms

AAMPO	Alamo Area Metropolitan Planning Organization
ASP	Agency Safety Plan
CSO	Chief Safety Officer (transit)
FTA	Federal Transit Administration
NSP	National Public Transportation Safety Plan
NTD	National Transit Database
PTASP	Public Transportation Agency Safety Plan
SMS	Safety Management System
SPT	Safety Performance Targets
TAM	Transit Asset Management
TIP	Transportation Improvement Program
UTD	Urban Transit District