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PUBLIC TRANSPORTATION AGENCY SAFETY PLAN



December 2020

Mission Statement

The Luzerne County Transportation Authority (LCTA), through the operation of fixed route and shared ride divisions, seeks to provide high quality affordable public transportation services that are safe, reliable, useful, accessible and efficient. To this end, members of the Board of Directors and all employees shall conduct themselves in a professional manner; work to ensure the safety and security of passengers; seek new opportunities to improve and/or expand services; and coordinate public transit services with other agencies, organizations, and transit providers.

About LCTA

The Luzerne County Transportation Authority (the “LCTA”) or (the “Authority”) is an independent local governmental unit classified as a Pennsylvania municipal authority, which is responsible for providing both fixed route bus and paratransit public transportation service in Luzerne County, Pennsylvania.

The fixed route bus system has been operated by the Authority since October 1972. In May 2012, the Authority acquired the administration, operations, and maintenance responsibilities for the Shared Ride Program (paratransit service) from Luzerne County government.

The Authority’s efforts to implement a safety plan began in 2014 when a new management team was installed with a creation of a safety and training manager position for both the fixed route and paratransit (Demand Response) divisions.

The Luzerne County Transportation Authority currently provides the Wilkes-Barre urbanized area with scheduled mass transportation bus service across 17 routes. LCTA’s bus fleet operates on routes serving 31 municipalities within the urbanized area, so that approximately 88% of the population resides within one-quarter of a mile of a bus route. Route frequency of the various routes averages out to about every forty-five minutes, with some routes operating every half-hour. Our current service hours are between approximately 5:00 AM and 1:00 AM, Monday thru Friday and between approximately 9:00 am and 6:00 pm on Saturdays. The Luzerne County Transportation Authority also assists persons with disabilities in fulfilling their transportation needs and to meet requirements of the Americans with Disabilities Act of 1990. This paratransit Special Transportation Efforts Program (S.T.E.P.) is available in the General Service Area of the Luzerne County Transportation Authority.

TABLE OF CONTENTS

Section	Page
EXECUTIVE SUMMARY	1.
SECTION 1: TRANSIT AGENCY INFORMATION	2.
SECTION 2: PLAN DEVELOPMENT, APPROVAL & UPDATES	3.
SECTION 3: SAFETY PERFORMANCE TARGETS	5.
SECTION 4: SAFETY MANAGEMENT POLICY	7.
SECTION 5: SAFETY RISK MANAGEMENT	15.
SECTION 6: SAFETY ASSURANCE	20.
SECTION 7: SAFETY PROMOTION	25.
SECTION 8: SUPPORTING DOCUMENTATION	29.
Item 8.1: LCTA Risk Assessment Matrix	30.
Item 8.2: Event Investigation Casual Factor Analysis Form	32.
Item 8.3: Safety Performance Targets Tracking Sheet	32.
Item 8.4: LCTA All Hazards Risk Register Tracking Sheet	32.
Item 8.5: LCTA Driver Incident Report Form	33.
Item 8.6: LCTA Employee Accident Report Form	34.
Item 8.7: LCTA Transit Vehicle Pre-Trip Inspection Report Form	40.
Item 8.8: LCTA Transit Vehicle Technology Defect Report	41.
Item 8.9: LCTA Transit Vehicle Operator Defect Report Form	42.
Item 8.10: LCTA ESRP Safety Concern Reporting Form	43.
Item 8.11: LCTA Near Miss Incident Report Form	44.
Item 8.12: LCTA Organizational Chart	45.
Item 8.13: PennDOT LCTA ASP Self-Certification Letter	46.
Item 8.14: Authority Board PTASP Adoption Resolution	47.
Item 8.15: Authority Board Meeting Agenda	48.
SECTION 9: DEFINITIONS OF TERMS USED IN THE SAFETY PLAN	49.
SECTION 10: COMMONLY USED ACRONYMS	54.

Executive Summary

The Luzerne County Transportation Authority (“*the LCTA*” or “*the Authority*”) is a municipal authority, established in October of 1972, and governed by the Pennsylvania Municipal Authorities Act of 1945. The LCTA operates both fixed route bus and demand response paratransit public transportation services in Luzerne County, Pennsylvania. The LCTA does not purchase transportation services from a subcontractor, and does not provide transportation services on behalf of another entity or subcontractor. The LCTA is a recipient/subrecipient of DOT/FTA Section 5307, 5310, and/or 5311 funds.

The Luzerne County Transportation Authority has developed this Public Transportation Agency Safety Plan in accordance with the provisions of 49 C.F.R. Part 673. At the time of this writing, the LCTA has opted to draft and monitor its own internal safety plan, and opt out of a PennDOT sponsored plan. However, as the regulatory environment develops, the LCTA may choose to formally opt in to join the Pennsylvania Department of Transportation (PennDOT) state-sponsored public transportation agency safety plan.

As a small public transportation provider with less than 100 or fewer vehicles in peak revenue service, this safety plan shall apply to both fixed route (bus) and demand responsive (paratransit) modes. The Authority does not operate rail fixed-guideway public transportation services.

Should the LCTA develop so that it no longer meets the definition of a small public transportation provider, it will within one year from that date, draft and certify a plan compliant with requirements of systems operating greater than 100 vehicles in a single mode.

This public transportation agency safety plan shall have an effective date of December 1, 2020, with annual certification by the Authority taking place at the June meeting of the Authority Board of Directors.


The goals of this safety plan are to:

- Assist in the prioritization of both human and capital investment through safety performance-based planning;
- Further establish and reinforce a culture of safety responsibility and accountability among all Authority employees, managers, contractors, and officials;
- Cross reference safety performance data with Authority Transit Asset Management Plan (TAM) data to ensure the transit system is operating in a state of good repair (SGR);
- Advance and promote use of the Authority Employee Safety Reporting Program (ESRP);
- Implement Safety Management Systems (SMS) to manage and mitigate safety risks;
- Identify, establish, monitor, and update safety performance targets;
- Identify and deliver safety training resources to Authority employees;
- Establish document retention protocols; and
- Share safety performance data with Federal, state, and local (MPO) planning partners.

SECTION 1: TRANSIT AGENCY INFORMATION

Transit Agency Name	Luzerne County Transportation Authority (LCTA)			
Transit Agency Address	315 Northampton Street Kingston, PA 18704			
Name and Title of Accountable Executive	Mr. Lee Horton, Interim Executive Director			
Name of Chief Safety Officer or SMS Executive	Mr. Lee Horton, Interim Executive Director & CSO			
Mode(s) of Service Covered by This Plan	Fixed Route (MB/DO) Paratransit (DR/DO)	FTA Funding Types	5307, 5339, 5310 (Subrecipient)	
Mode(s) of Service Provided by the Transit Agency	Fixed Route (MB): Directly Operated Demand Response (Paratransit Van): Directly Operated			
Does the agency provide transit services on behalf of another transit agency or entity?	Yes	No X	Description of Arrangement(s)	N/A
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	N/A			

SECTION 2: PLAN DEVELOPMENT, APPROVAL & UPDATES

Name of Entity That Drafted This Plan	Luzerne County Transportation Authority, Office of Regulatory Compliance & Administrative Services and CSO	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
		12/1/2020
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	LCTA Board of Directors	12/1/2020
	Relevant Documentation	
	2.1 LCTA Board Agenda (December 1, 2020) 2.2 Board Action Resolution (December 1, 2020)	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification
	Board of Directors of the Luzerne County Transportation Authority	December 1, 2020
	Relevant Documentation	
	<p>A copy of the LCTA Board of Directors Authorizing Resolution and Meeting Minutes (December 1, 2020), approving the Agency Safety Plan (ASP), is maintained by the Secretary of the Board and the Chief Safety Officer, LCTA.</p> <p>Pursuant to 49 CFR Parts 673.13(a) and 673.13(b), the Luzerne County Transportation Authority certifies that it has established this Public Transportation Agency Safety Plan, meeting the requirements of 49 CFR Part 673 one year after the effective date of the final rule. On an annual basis taking place during the month of June, with the completion on or by June 30th, the LCTA shall certify its compliance with 49 CFR Part 673. The FTA does not require this plan to be submitted to FTA on a regular basis. Instead, the LCTA shall certify that it has established this Safety Plan, which fulfills the requirements under Part 673, and attach such certification to this Public Transportation Agency Safety Plan. The FTA annually amends and issues the list of Certifications and Assurances. The LCTA shall review such guidance for incorporation into the safety program as necessary.</p>	

Version Number and Updates			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1.0	All	New Document	12/1/2020

Annual Review and Update of the Public Transportation Agency Safety Plan

The Authority’s PTASP shall be jointly reviewed and updated by the CSO, Director of Operations, and the Director of Maintenance on an annual basis, to take place during the month of June, with the completion on or by June 30th, the LCTA shall certify its compliance with 49 CFR Part 673. Safety performance data shall be reviewed at this time and compared to historical data. The Accountable Executive will review and approve any changes, signing the new ASP, then forward to the LCTA Board of Directors for review and formal approval.

During this review, if any updates are required to be made to the plan, the following actions shall take place: (1) Documented updates and revisions in Section 2; (2) Communicate updates and revisions to all managers and employees via internal memo; (3) Communicate updates and revisions to state and local (MPO) planning partners; and (4) Communicate updates and revisions to the Authority Board of Directors at their June meeting.

In addition, the LCTA Shall update its ASP at any point when information, processes or activities change within the Agency and/or when Part 673 undergoes significant changes, or annually, whichever comes sooner. As the LCTA collects data through its Safety Risk Management and Safety Assurance processes, the Authority will evaluate its safety performance targets (SPTs) to determine whether they need to be changed, as well.

Specifically, LCTA will review its ASP when it:

- Determines its approach to mitigating safety deficiencies is ineffective;
- Makes significant changes to service delivery;
- Introduces new processes or procedures that may impact safety;
- Changes or re-prioritizes resources available to support SMS; and/or
- Significantly changes its organizational structure.

SECTION 3: SAFETY PERFORMANCE TARGETS

LCTA Annual Safety Performance Targets (2020)*								
FY Year	Mode of Transit Service	Fatalities (Total)	Fatalities (Per 100K VRM)	Injuries (Total)	Injuries (Per 100K VRM)	Safety Events (Total)	Safety Events (Per 100K VRM)	System Reliability (VRM/Failures)
2020	Fixed Route Bus (MB/DO)	0	0	3	1	3	1	6,800
	ADA Paratransit (DR/DO)	0	0	2	1	2	1	41,000

*Targets are based on review of the previous 5 years of LCTA's safety performance data. FY: 7/1 to 6/30.

Safety Performance Measure Definitions:

- FATALITIES** (The total number of reportable fatalities and rate per total vehicle revenue miles by mode). Measuring the number of fatalities over vehicle revenue miles, by mode, provides a fatality rate from which to assess future performance. Fatalities include death(s) confirmed within 30 days, excluding suicide, trespassers, illness, or natural causes.
- INJURIES** (The total number of reportable injuries and rate per total vehicle revenue miles by mode). Injuries occur much more frequently, and are due to a wide variety of circumstances. Analyzing the factors that relate to injuries is a significant step in developing actions to prevent them. Measuring the number of injuries by mode, over vehicle revenue miles provides an injury rate from which to assess future performance. Injuries include harm to a person that requires immediate medical attention away from the event scene.
- SAFETY EVENTS** (The total number of reportable events, major and non-major, and rate per total vehicle revenue miles by mode). The safety events measure captures all reported safety events that occur during transit operations and the performance of regular supervisory or maintenance activities. A reduction in safety events will support efforts to reduce fatalities and injuries, as well as damages to transit assets. Measuring the number of safety events by mode over vehicle revenue miles provides a safety event rate from which future performance can be compared. A safety event includes a collision, fire, hazardous material spill, or evacuation.
- SYSTEM RELIABILITY** (The mean distance between major mechanical failures by mode). The system reliability measure expresses the relationship between safety and asset condition. The rate of vehicle failures in service, defined as mean distance between major mechanical failures, is measured as revenue miles operated divided by the number of major mechanical failures. System reliability includes any major mechanical failure(s) that prevent a revenue vehicle from completing or starting a scheduled trip.

Safety Performance Target Coordination

The Authority shall coordinate safety performance management and planning with its state DOT and MPO planning partners in order to identify investment and management strategies to improve or preserve the condition of transit capital assets in order to achieve and maintain a state of good repair and safe transit operations.

The Authority’s Accountable Executive shares the ASP, including safety performance targets, with the Lackawanna/Luzerne Metropolitan Planning Organization (MPO) each year after its formal adoption by the LCTA Board of Directors. The Authority’s Accountable Executive also provides a copy of our formally adopted plan and performance targets to the PennDOT Bureau of Public Transportation. Authority personnel are available to coordinate with PennDOT and the MPO in the selection of specific PennDOT and MPO safety performance targets upon request.

The Metropolitan Transportation Plan shall include integration of the Authority’s PTASP. This coordination shall take place in two ways:

- (1) A description of the performance measures and targets; and
- (2) A report evaluating the condition of the transit system(s) with respect to the State and MPO performance measures and targets, including the progress achieved in meeting performance targets compared with system performance recorded in previous years.

With this data, both the MPO and the Authority can prioritize capital investment planning while balancing SGR and supporting safe transit operations.

Targets Transmitted to the State DOT	State DOT	Dates Targets Transmitted
	PennDOT, Bureau of Public Transportation	On or by 7/7 of each calendar year.
Targets Transmitted to the Metropolitan Planning Organization(s) (MPO)	Metropolitan Planning Organization (MPO)	Dates Targets Transmitted
	The Lackawanna/Luzerne MPO	On or by 7/7 of each calendar year.

SECTION 4: SAFETY MANAGEMENT POLICY

Safety Management Policy Statement



SAFETY MANAGEMENT POLICY STATEMENT

Safety is a core value at the Luzerne County Transit Authority ("the LCTA" and/or "the Authority"), and managing safety is a core business function. The LCTA is committed to developing, implementing, maintaining, and constantly improving SMS processes to ensure that all our operational, maintenance, and transit service delivery activities take place under a balanced allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting established standards. Integrating safety management is among the primary responsibilities of all managers and employees of the Authority.

All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the Executive Director and Chief Safety Officer (CSO). All employees, officials and contractors will support safety management by ensuring all hazards are identified and reported. It is the safety objective and mission of the Luzerne County Transportation Authority: *To make transit safer through policy development, hazard identification and investigation employee reporting, data collection, risk analysis, mitigation strategies, effective oversight programs, and information sharing.*

The LCTA will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. The LCTA is committed to the following safety objectives:

- **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 our safety management system;
- **Provide** appropriate management involvement and the necessary resources to establish an effective ESRP that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- **Establish and operate** hazard identification and analysis, and safety risk evaluation activities, including the utilization of an employee safety reporting program (ESRP) as a fundamental and primary source for the reporting and documentation of safety concerns and hazard identification, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities to a point which is consistent with our acceptable level of safety performance;
- **Confirm** that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicate an illegal act, gross negligence, or deliberate or willful disregard of regulations and procedures;
- **Identify** hazardous and unsafe work conditions and analyzing data from the ESRP. After thoroughly analyzing provided data, the Authority CSO and applicable transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level;
- **Provide** a culture of open dialog and reporting of all safety concerns, and ensure that no action will be taken against any employee who discloses a safety concern through the Authority Employee Safety Reporting Program (ESRP), 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** safety performance targets 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;
- **Establish and measure** our safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- **Continually improve** our safety performance through management processes that ensure that appropriate safety management action is taken and is effective;
- **Ensure** externally supplied systems and services to support our operations are delivered meeting our safety performance standards; and
- **Develop** multiple communication methods that explain the purpose and benefits of the Safety Management System (SMS) to all staff, managers, supervisors, and employees.

All LCTA executives, management, supervisory personnel, and appointed officials share in the responsibility for implementing and monitoring the Authority’s Agency Safety Plan within their respective areas, and will be assigned specific tasks with clearly defined accountabilities to ensure compliance is achieved. The LCTA Accountable Executive will evaluate the managerial and supervisory staff performance based on their successful implementation of the LCTA’s policies and procedures and achievement of safety performance targets, in the same way the LCTA assesses their performance regarding other agency goals. For our inaugural Agency Safety Plan, it is our objective to reduce safety events overall, as specified in our safety performance targets.

As the Interim LCTA Executive Director and Accountable Executive, I maintain overall responsibility and accountability for the Authority’s compliance with its Agency Safety Plan and SMS management. To ensure day-to-day administration, including program preparation, data gathering and monitoring and accident investigation, I will also serve as the LCTA’s Chief Safety Officer (CSO). AS the CSO I shall have authority with all levels of management, labor unions, contractors, and employees. I can be contacted via phone at 570-287-2148, or in-person at the LCTA Administrative and Operations Headquarters.

The LCTA is committed to undertaking and continuously improving an Agency Safety Plan and SMS that sets forth the policies, practices and procedures, with goals and timetables. The Authority shall communicate and distribute the Safety Management Policy Statement throughout the organization, and make the Agency Safety Plan (ASP) available for inspection, upon request, by any employee, contractor, or planning partner. Both this policy and ASP will be updated at least once on an annual basis, as cited in 49 CFR Part 673.



 Mr. Lee Horton, Interim Executive Director & Chief Safety Officer

12/01/2020

 Date:

Safety Management Policy Communication

Both the Authority Executive Director and the Chief Safety Officer introduced SMS principles in June 2020, at a senior staff meeting. The Authority has incorporated review and distribution of the Safety Management Policy Statement into new-hire training and all-staff annual refresher training. Upon inaugural certification and LCTA Board approval in (November 2020), the safety management policy (SMP) shall be communicated, internally, throughout the agency in the following ways:

- The inaugural copy of the LCTA Safety Management Policy Statement shall be distributed to each employee in the form of a handout, to be distributed by the CSO and each department manager on or by the conclusion of the fiscal year.
- A copy of the SMP will be made available for all Authority employees upon hire during initial onboarding training.
- A copy of the SMP will be made available for all Authority employees during annual refresher training (October).
- A copy of the SMP will be made available for all Authority employees upon any updates or revisions to the policy and ASP (Annually/June).

Additionally, the Authority CSO shall also posts copies of the Safety Management Policy Statement on bulletin boards at headquarters and in the operations and maintenance break areas of each operating division within the LCTA. The Safety Management Policy Statement will be posted in the following locations:

- In employee common areas;
- Operator lounge and maintenance employee lunchroom;
- Dispatch Office;
- Training Room;
- Safety Communication Board;
- Board Room; and
- Employee policy bulletin boards on Authority property.

Safety Authorities, Accountabilities and Responsibilities

The following LCTA staff members are charged with the overall responsibility and authority of directing the Agency Safety plan, SMS, and in establishing and monitoring safety performance objectives.

Accountable Executive: The Accountable Executive (Executive Director) is a single, identifiable individual who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of the LCTA with the following authorities, accountabilities, and responsibilities:

- Controls and directs human and capital resources needed to develop and maintain the ASP and SMS.
- Designates and oversees an adequately trained Chief Safety Officer who is a direct report.
- Ensures that the LCTA's SMS is effectively implemented.
- Ensures action is taken to address substandard performance in LCTA's SMS.
- Assumes ultimate responsibility for carrying out LCTA's ASP and SMS.
- Maintains responsibility for carrying out the agency's Transit Asset Management Plan.

Additionally, the Accountable Executive is responsible for ensuring all LCTA managers and supervisors share in the responsibility of ensuring compliance is achieved through understanding, communication, and active involvement in the support of the SMS. Performance evaluations of managers and supervisors shall include evaluating the success of the PTASP in the same manner as performance on other goals.

Chief Safety Officer (CSO): The Chief Safety Officer (Interim Executive Director) is an adequately trained individual who has responsibility for safety and reports directly to the LCTA Accountable Executive (Interim Executive Director). The LCTA CSO will manage and administer the day-to-day operation of the Agency Safety Plan and SMS.

The CSO shall possess the following essential characteristics in order to be effective in the discharge of their duties:

- Sensitivity to, and subject-matter expertise of, the varied ways in which accidents and safety hazards occur;
- Strategic safety management function, and total commitment to SMS goals and objectives;
- Knowledge of applicable laws, policies, rules, regulations, and guidelines; and
- Sufficient authority and ability to work and communicate, via tailored communication methods and training materials, with others (e.g., department heads, employees) to achieve SMS goals and objectives.

The responsibilities of the Authority CSO include, but are not limited to, the following duties:

1. Develop and implement the Authority's the Safety Management Policy Statement and a written ASP.
2. Advise senior management on safety matters, and provide strategic direction.
3. Maintain documentation and records of all safety-related (ASP/SMS) operational activities.
4. Collect, track and analyze safety management performance data, identifying problem areas, setting safety performance targets and timetables, and developing mitigation efforts to achieve goals.
5. Monitors SMS safety performance against established safety performance indicators and targets.
6. Design, implement, and monitor internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where proactive action is needed.
7. Review of the Authority's ASP and SMS with all managers and supervisors to ensure that the policy is understood.
8. In conjunction with the Authority Human Resources Department, periodically review employment practices and policies.
9. Report, at least semiannually, to the Accountable Executive on safety performance progress in relation to the agency's goals, and on applicable contractor and vendor compliance.
10. Serve as a safety matter SME and liaison between the Authority; Federal, state, county, local governments, and regulatory agencies.
11. Maintain awareness of current safety laws and regulations, and ensuring the laws and regulations affecting the Authority are disseminated to responsible officials.
12. Hold regular discussions with other managers, supervisors, and employees to ensure Authority safety policies and procedures are being followed.
13. Conduct periodic inspections to ID safety hazards and perform safety risk analysis.
14. Respond to and Investigate complaints of safety hazards and accidents.
15. Develop curriculum and deliver safety training to employees and managers.

16. Provides official notification of safety hazards to all employees.
17. Coordinate the implementation of safety risk mitigations, and review the effectiveness of safety mitigation(s).
18. Assess the impact on safety of operational changes.
19. Monitor and document safety promotion activities.
20. Identifies and describes the interface with external public safety and emergency preparedness organizations.
21. Ensures coordination in plans for dealing with the management of emergencies/unexpected events and abnormal operations, and the return to normal operations.
22. Maintain records and their retention for inputs and outputs of the safety risk and safety assurance management process; SMS training and employee communications; safety performance data and reporting; ASP updates; and SMS activities.
23. Serves as NTD safety & security incident reporter (S&S).
24. Chairs the LCTA Safety Committee.

Agency Leadership and Executive Management:

Director of Administrative Services: The Director of Administrative Services is accountable and responsible for:

- The implementation of the Authority's PTASP by ensuring employee and customer safety hazard complaints are forwarded to the CSO.
- Ensure safety hazard communications are distributed to employees.
- Coordinate with the Authority CSO, Human Resources Manager, and Director of Operations to develop employee safety training courses.
- Complete training on SMS and LCTA's ASP elements.
- Oversee day-to-day operations of the SMS within department.
- Modify policies within department, consistent with implementation of the SMS, as necessary.

Director of Maintenance: The Director of Maintenance is accountable and responsible for:

- Ensure the implementations of the Authority's PTASP by ensuring employee safety hazard complaints are forwarded to the CSO.
- Ensure safety hazard communications are distributed to employees.
- Responsible for ensuring TAM inspections and maintenance protocols are followed.
- Complete training on SMS and LCTA's ASP elements.
- Oversee day-to-day operations of the SMS within department.
- Modify policies within department, consistent with implementation of the SMS, as necessary.

Director of Operations (Fixed Route): The Director of Operations is accountable and responsible for:

- The implementation of the Authority's PTASP by ensuring employee safety hazard complaints are forwarded to the CSO, and safety hazard communications are distributed to employees.
- Assist the CSO in the collection of safety performance data.
- Coordinate with CSO, Director of Administrative Services, and Human Resources Manager to develop employee safety training courses.
- Incorporate safety hazard information into and delivering employee training programs.
- Assist the CSO in investigating safety hazard complaints and safety incidents (accidents).
- Complete training on SMS and LCTA's ASP elements.
- Oversee day-to-day operations of the SMS within department.
- Modify policies within department, consistent with implementation of the SMS, as necessary.
- Serve as a member of the Authority Safety Committee, and as the Authority's Drug and Alcohol Program Manager (DAPM).

Human Resources Manager: The Human Resources Manager is accountable and responsible for:

- The implementation of the Authority's PTASP by ensuring employee safety hazard complaints are forwarded to the CSO, and safety hazard communications are distributed to employees.
- Coordinate with CSO, Director of Administrative Services, and Director of Operations to develop employee safety training courses.
- Complete training on SMS and LCTA's ASP elements.
- Oversee day-to-day operations of the SMS within department.
- Modify policies within department, consistent with implementation of the SMS, as necessary.
- Serve as a member of the Authority Safety Committee.

Authority Board of Directors: The Authority Board of Directors are accountable and responsible to the implementation and maintenance of the Authority's PTASP by ensuring the provisions of the safety plan are being observed and followed by the agency Accountable Executive and Chief Safety Officer. A member of the Authority Board shall be nominated to Chair the Board Safety & Security Committee, and serve on the LCTA Safety Committee by being present at all Authority Safety Committee meetings. The Authority Board shall aid in the establishment and monitoring of annual safety performance metrics, and preside over the annual update and formal approval of the ASP.

Paratransit (Shared Ride Program) Operations Manager: The Paratransit Program Operations Manager is accountable and responsible for:

- The implementation of the Authority's PTASP by ensuring employee and client safety hazard complaints are forwarded to the CSO, and safety hazard communications are distributed to employees.
- Serve as a member on Authority Safety Committee.
- Responsible for incorporating safety hazard information into and delivering employee training programs.
- Complete training on SMS and LCTA's ASP elements.
- Oversee day-to-day operations of the SMS within department.
- Modify policies within department, consistent with implementation of the SMS, as necessary.

Paratransit (Shared Ride Program) Assistant Operations Manager & Safety Training Manager: The Paratransit Program Assistant Operations Manager & Safety Training Manager is accountable and responsible for:

- The implementation of the Authority's PTASP by ensuring employee and client safety hazard complaints are forwarded to the CSO.
- Ensure safety hazard communications are distributed to employees.
- Serve as a member on Authority Safety Committee.
- Incorporate safety hazard information into and delivering employee training programs.
- Assist the CSO in investigating safety hazard complaints and safety incidents.
- Complete training on SMS and LCTA's ASP elements.
- Oversee day-to-day operations of the SMS within department.
- Modify policies within department, consistent with implementation of the SMS, as necessary.

Key Staff:

Maintenance Manager: The Authority Maintenance Manager is accountable and responsible for:

- Confirm the implementation of the Authority's PTASP by ensuring employee safety hazard complaints is forwarded to the CSO.
- Ensure safety hazard communications are distributed to employees.
- Ensuring safety, maintenance, and TAM protocols are followed.
- Complete training on SMS and LCTA's ASP elements.
- Oversee day-to-day operations of the SMS within department.
- Modify policies within department, consistent with implementation of the SMS, as necessary.

Compliance Analyst: The Authority Compliance Analyst assists both the Accountable Executive and CSO by monitoring state and federal regulatory updates, and providing legal updates to senior staff. Assists in the development and drafting of the ASP, and in collecting and analyzing both ASP/SMS and TAM data sets.

Fixed Route Dispatcher: The role of the Authority Fixed Route Dispatcher is to notify both the Director of Operations and CSO of safety hazards and safety incidents in-real-time, and enters safety-related information into the daily dispatch log. Also, distributes safety communication information to/from the CSO and to operators when they report/end for their shift.

Paratransit (Shared Ride Program) Dispatcher: The role of the Authority Paratransit Dispatcher is to notify both the Director of Operations and CSO of safety hazards and safety incidents in-real-time, and enters safety-related information into the daily dispatch log. Also, distributes safety communication information to/from the CSO and to operators when they report/end for their shift.

Key Staff Activities:

The LCTA utilizes a monthly safety committee meeting, bi-monthly senior staff meetings and bi-annual all-staff training meetings, to support its SMS and safety programs:

- **Safety Committee Meeting:** The LCTA holds a monthly safety committee meeting. Membership is open to any Authority employee. Any safety hazards reported will be jointly evaluated by the Authority Safety Committee and the Chief Safety Officer during the monthly meeting. The Authority Safety Committee members include the Chief Safety Officer, HR Manager, Director of Operations (SR and FR), Paratransit Assistant Manager, an operations manager, a representative of both the ATU and Teamsters Union(s), a representative from fixed route, a representative from paratransit, and a representative from the LCTA Board who meet monthly to review issues and make recommendations to improve safety.

The monthly safety committee meeting also includes a component to serve as a driver and maintenance employee meeting. Each safety committee meeting contains a documented record of written meeting minutes and a permanent agenda. All safety issues are discussed and documented.

- **Bi-Monthly Senior Staff Meetings:** The members of the Authority's executive management hold bi-monthly meetings to discuss various business, operational and regulatory items. In addition to the Authority Executive Director, all senior level (Director) management employees of the Authority are required to attend. Safety performance metrics, data, and safety hazard information will be shared by the CSO with those in attendance for review and deliberation toward a mitigation or solution. Safety items discussed in this meeting will be utilized by the CSO for safety policy development and SMS monitoring. Information discussed in these meetings will be documented and retained by the CSO.

- **Bi-Annual All-Staff Training Meetings:** Hazard reports and mitigations shall be shared, safety topics will be brought up for open discussion, further feedback solicited, and hazard self-reporting further encouraged. The CSO will also deliver safety training course content during these meetings. Training and information discussed in these meetings will be documented and retained by the CSO.

Employee Safety Reporting Program

The LCTA Employee Safety Reporting Program (ESRP) encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. All new hires shall be trained on the process of how to report a safety hazard using the Authority's ESRP. Additionally, all employees will receive introduction and refresher training on how to report safety hazards during semi-annual training. It is required that all reported safety hazards be documented in a written format and submitted to the CSO. All written/documented safety concern reports (see Item 8.10) will be logged in the safety report register (see Item 8.4), followed up on, and investigated by the CSO within 36 hours of submission. There are many ways employees can report safety conditions:

1. Any Authority employee who, upon observation of an unsafe condition or safety hazard that poses, an immediate danger, is to directly and immediately notify their respective dispatcher, supervisor or CSO verbally, when conditions permit. The dispatcher on duty shall enter all reported safety hazards into the daily operations log. Additionally, a completed written safety concern form shall also be required to be filed at the conclusion of the reporting employee's shift and filed with the CSO via the locked safety concern box outside the office of the CSO near the safety communication board.
2. When hazardous conditions are present or observed that do not require an immediate mitigation response (including all near misses), the Authority employee is required to verbally report the hazard to their immediate supervisor and/or dispatch office. The dispatcher on duty shall enter all reported safety hazards into the daily operations log. Additionally, a completed written safety concern form shall also be required to be filed at the conclusion of the reporting employee's shift and filed with the CSO via the locked safety concern box outside the office of the CSO near the safety communication board.
3. Safety concerns can also be verbally expressed at the monthly safety committee meeting. Additionally, a completed written safety concern form shall also be required to be filed at the conclusion of the meeting by the reporting employee and provided to the CSO.
4. Although not encouraged, any Authority employee may file a written safety concern form anonymously. A blank sheet of paper with a written narration of an unsafe condition or hazard can also be submitted to the CSO via the locked safety concern box outside of the office of the CSO near the safety communication board.

On a daily basis, the CSO reviews the dispatch Daily Operations Log (DOL), checks the comment box, and documents identified safety conditions in the electronic Safety Risk Register (SRR). The LCTA CSO, ensuring that hazards and their consequences are appropriately identified and resolved through the Authority's SRM process and that reported deficiencies and non-compliance with rules or procedures are managed through the safety assurance process.

Once a completed written Safety Concern Form (SCF) is completed by the employee, the CSO shall coordinate with the dispatcher or departmental supervisor to develop a hazard mitigation plan and employee communications strategy. Documentation reporting, safety database tracking, and investigation of the incident shall then take place. Upon close out of the incident, an “after actions” brief will take place among senior Authority management and applicable employees. New safety rules and/or training curriculum shall then be developed and implemented.

The Authority CSO shall discuss actions taken to address reported safety conditions during both the bi-monthly senior staff meetings, and the monthly Authority Safety Committee meeting. Additionally, if the reporting employee provided his or her name during the reporting process, the CSO or designee follows up directly with the employee when the Authority determines whether or not to take action, and after any mitigation are implemented.

The Authority encourages participation in the ESRP by protecting employees that report safety conditions in good faith. The Authority shall not retaliate against any employee, as per state and federal regulations, for reporting an observable safety hazard. However, the Authority shall take and enforce the progressive disciplinary process, up to and including termination of employment, as outlined in the applicable non-union employment policy and/or the collective bargaining agreement in the following instances if it is determined:

- Willful participation in illegal activity, such as assault or theft;
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk;
- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances;
- Knowingly operating Authority-owned property that is deemed to be in an unsafe condition;
- Knowingly signs off on the maintenance report of an Authority-owned asset when it presents an unsafe condition;
- Violations of the Authority DOT Drug and Alcohol Policy;
- Not conducting protocols for pre- and post-trip inspections; and/or
- Knowingly not reporting an observable safety hazard within the provisions of this safety policy.

SECTION 5: SAFETY RISK MANAGEMENT

Safety Risk Management Program

Safety Risk Management (SRM) Process:

The LCTA uses the SRM process as a primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. The Authority’s SRM process consists of the following activities:

- **Safety Hazard Identification:** The methods or processes to identify hazards, level of risk, and consequences of the hazards.
- **Safety Risk Assessment:** The methods or processes to assess the safety risks associated with identified safety hazards.

- **Safety Risk Mitigation:** The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment.

Additionally, SRM is a process whereby hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to the Authority's leadership. The LCTA SRM process allows us to carefully examine what could cause harm and determine whether we have taken sufficient precautions to minimize the harm, or if further mitigations are necessary. The steps to the SRM process include:

1. Hazard Identification (a real or potential condition) and level of risk (severity and probability);
2. Hazard Analysis (determine consequence);
3. Evaluate the Safety Risk;
4. Mitigate the Safety Risk;
5. Manage Safety Risks; and
6. Monitor and Measure Safety Risk after Mitigation Implemented.

The LCTA Chief Safety Officer (CSO) leads the Authority's SRM process, working with the LCTA Safety Committee to identify hazards and consequences, assess safety risk of potential consequences, and mitigate safety risk. The results of the LCTA SRM process are documented in our safety risk register (see Item 8.4) and referenced materials.

The LCTA SRM process applies to all functioning elements of our system including: operations and maintenance; facilities and vehicles; administration; and personnel recruitment, training, and supervision.

In carrying out the SRM process, Authority uses the following terms:

- **Event:** Any accident, incident, or occurrence (not a real or potential condition, has already occurred).
- **Hazard:** Any real or potential condition that can cause a consequence: injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure belonging to the Authority; or damage to the environment.
- **Risk:** Composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk Mitigation:** Method(s) to eliminate or reduce the effects of hazards.
- **Consequence:** An effect of a hazard involving injury, illness, death, or damage to Authority property or the environment.

Safety Hazard Identification:

As the first step in the safety risk management process, safety hazard identification involves identifying hazards and potential consequences of the hazards to address them before they escalate into incidents or accidents. Safety hazard Identification also provides a foundation for the safety risk assessment and mitigation that follows. Hazards are an inevitable part of transit operations. Only after the Authority identifies hazards, can they be addressed. The Authority shall utilize the following hazard identification sources:

- Employee safety concern reporting program (ESRP);
- Review of vehicle camera footage;
- Checklists and physical ride checks;

- Review of monthly performance data and safety performance targets;
- Observations of operations by supervisors;
- Maintenance reports;
- Internal safety investigations into safety events, incidents and occurrences;
- Accident reports and data sets;
- Compliance programs;
- Results of training assessments;
- Industry data (APTA, PPTA);
- Governmental oversight sources and authorities (PENNDOT, PSP, FTA, NTSB, NTD);
- Comments and feedback from customers, passengers, and third parties, including Authority transit insurance pool and vendors;
- Safety Committee and Staff Meetings; and
- Results of audits and inspections of vehicles and facilities, including TAM asset inspections.

The key attributes of effective hazard identification include:

- Determine the appropriate and potential consequence for the hazard (most common, worst possible, and/or worst credible consequence);
- Determine the severity of the hazard (characteristics of potential consequence as they relate to severity, and determine if singular or multiple criteria need to be addressed at the same time or at one at a time);
- Determine the likelihood of the hazard (Scope and location or equipment, Exposure and opportunity for occurrence, and Experience and probability of event);
- The more comprehensive the data sources and documentation, the more confident Authority management can be that safety concerns are being identified;
- Training all Authority employees on proper identification and reporting of safety concerns increases the likelihood that hazards can be addressed;
- Focus on the collection of safety concerns while coordinating with operations (CSO) and management personnel to identify the exact hazard(s); and
- Promote and support agency-wide safety concern reporting and hazard identification.

The process to identify a hazard comes from an employee, customer or manager. When a safety concern observed by LCTA management or supervisory personnel, whatever the source, it is reported to the Authority Chief Safety Officer, preferably by completing the Safety Concern reporting form. Procedures for reporting hazards to the LCTA CSO are reviewed during both Staff Meetings and Safety Committee Meetings. The LCTA CSO also receives employee reports from the ESRP, customer comments related to safety, and the dispatch daily Operations Log. The LCTA CSO reviews these sources for hazards and documents them in the LCTA Safety Risk Register. Also, once incident and/or safety concern data is cataloged in the safety/incident database, trend and ratio analysis shall be performed to determine any recurrent or emerging trends that are occurring on a regular basis.

The LCTA CSO also may enter hazards into the Safety Risk Register based on their review of Authority operations and maintenance, the results of audits and observations, and information received from FTA and other oversight authorities.

Next, an investigation is conducted by the CSO to determine the amount and type of risk a hazardous safety condition presents, and how to best mitigate the hazardous safety condition. The LCTA CSO may conduct further analyses of hazards and consequences entered into the Safety Risk Register to collect information and identify additional consequences and to inform which hazards should be prioritized for safety risk assessment.

In following up on identified hazards, the LCTA CSO may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard;
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary;
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard;
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.);
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard;
- Review any past reported hazards of a similar nature; and
- Evaluate tasks and/or processes associated with the reported hazard.

The LCTA CSO will then prepare an agenda to discuss identified hazards and consequences with both senior managers during bimonthly meetings and with the LCTA Safety Committee during their monthly meeting. The agenda may include additional background on the hazards and consequences, such as the results of trend analyses, vehicle camera footage, training needs, vendor documentation, reports and observations, or information supplied by FTA or other oversight authority.

Additionally, if any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately be brought to the attention of the Accountable Executive and addressed through the SRM process for safety risk assessment and mitigation. This means that the CSO believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of of EPA or PA DEP environmental protection standards. Otherwise, the CSO will prioritize hazards for further SRM activity.

Finally, if applicable a training course is developed as part of the safety hazard mitigation strategy. Finally, the CSO develops a hazard communication product and distributes it throughout the applicable workforce.

Safety Risk Assessment:

The Authority assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes: (1) Hazard Identification; (2) documentation and an assessment of risk (the likelihood and severity of the consequences of hazards), including existing mitigations; and (3) categorizing and prioritizing hazards based on safety risk.

The term “safety risk” represents the likelihood that people could be harmed, or equipment could be damaged, by the potential consequences of a hazard and the extent of the harm or damage. Therefore, safety risk is expressed and measured by the predicted probability and severity of a hazard’s potential consequences, as a percentage.

The safety risk assessment considers existing mitigations when determining whether further measures are needed to reduce the likelihood and severity of the potential consequences of a hazard.

The CSO assesses prioritized hazards using the LCTA Safety Risk Matrix (see Item 8.1). This matrix expresses assessed risk as a combination of one severity category and one likelihood level, also referred to as a hazard rating. For example, a risk may be assessed as “1A” or the combination of a Catastrophic (1) severity category and a Frequent (A) probability level.

This matrix also categorizes combined risks into levels, High, Medium, or Low, based on the likelihood of occurrence and severity of the outcome. For purposes of accepting risk:

- “**High**” hazard probability ratings will be considered unacceptable and require action from the Authority to mitigate the safety risk.
- “**Medium**” hazard probability ratings will be considered undesirable and require the Authority CSO to make a decision regarding the acceptability of risk, and
- “**Low**” hazard probability ratings may be accepted by the CSO without additional review.

Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk. The table below summarizes the safety risk assessment process:

Table 5.1

Safety Risk Assessment Analysis				
Event Probability	Percentage Rating	Potential Safety Consequences	Employee/Public Communication	Training Required
High Risk (1)	66% to 100%	Severe/Immediate Risk	YES	YES
Medium Risk (2)	31% to 65%	Moderate/Pending Risk	YES	YES
Low Risk (3)	0% to 30%	Minimal Risk	YES	If Applicable

The Authority CSO schedules safety risk assessment activities on the safety committee agenda and prepares a safety risk assessment package for the preceding month. This package is distributed at least one week in advance of the monthly safety committee meeting. During the meeting, the CSO reviews the hazard and its consequence(s) and reviews available information distributed in the safety risk assessment package on severity and likelihood. The CSO may request support from members of the safety committee in obtaining additional information to support the safety risk assessment.

Once sufficient information has been obtained, the CSO will facilitate completion of the remaining relevant sections of the Safety Risk Register, using the Authority Safety Risk Assessment Matrix. The CSO will document the safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Authority Safety Risk Register. The CSO will maintain on file safety committee agendas, safety risk assessment packages, additional information collection, and completed safety risk register sections for a period of three years from the date of generation.

Safety Risk Mitigation:

Following the safety risk assessment, the Authority shall identify and develop a safety mitigation strategy that may be necessary to protect the public and personnel from an unsafe condition(s). Both the Authority Accountable Executive and Chief Safety Officer shall review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards based on recommendations from all reporting sources. It is these actions that can reduce safety risk by reducing the likelihood and/or severity of potential consequences of hazards.

The safety risk mitigation actions taken by the Authority are designed to reduce the probable likelihood and/or severity of the potential consequences of a safety hazard. The Authority CSO tracks and updates safety risk mitigation information in the Safety Risk Register and makes this data and information available to the Authority Safety Committee during monthly meetings, and to senior staff upon request. This safety risk mitigation strategy enables the Authority to actively “manage” safety risk(s) in a manner that is aligned with the Authority’s safety performance targets, and consists of initial, ongoing, and revised mitigations.

Categorization and prioritization of safety risk mitigations is based on the results of safety risk assessments. The Authority CSO shall document and review the specific measures, activities (observations and audits) and mitigation strategies employed and conducted for each specific safety incident/hazard. This shall take place, at a minimum, of once per each quarter (90 days) and updated as applicable to monitor the effectiveness of the mitigations once implemented. Additionally, all safety events and hazards shall have a safety risk mitigation analysis performed to determine the severity of potential consequences, mitigation approaches, and both training and communications needs (See Table 5.2). All mitigation strategies shall be documented in the Safety Risk Register by the CSO. All mitigation strategies shall be communicated by the CSO to all Authority employees and the public (as applicable).

Table 5.2

Safety Risk Mitigation Analysis					
Event Probability	Percentage Rating	Potential Safety Consequences	Employee/Public Communication	Training Required	Mitigation Strategy (Initial, Ongoing, Revised)
High Risk (1)	66% to 100%	Severe/Immediate Risk	YES	YES	As applicable
Medium Risk (2)	31% to 65%	Moderate/Pending Risk	YES	YES	As applicable
Low Risk (3)	0% to 30%	Minimal Risk	YES	If Applicable	As applicable

SECTION 6: SAFETY ASSURANCE

Safety Assurance:

The safety assurance component ensures that safety hazard/event mitigations and safety training protocols are implemented, adhered to, appropriate, effective, and sufficient in addressing the potential consequences of

identified hazards. The data derived from the mitigations developed under the safety risk management process are analyzed and reviewed to determine if (1) the mitigations are effective, and (2) that no new risks have been introduced through implementation of the mitigations.

Safety assurance is the process within the Authority's SMS that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the Authority meets or exceeds its safety performance objectives through the collection, analysis, and assessment of information. Through our safety assurance process, the Authority:

- Determines if and how well mitigation strategies and actions are working;
- Evaluates our compliance with operations and maintenance procedures to determine whether our existing rules and procedures are sufficient to control our safety risk;
- Provides key information for data-driven unformatted decision making, and timely information on safety performance;
- Assesses the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended;
- Investigates safety events to identify causal factors;
- Analyzes information from safety reporting, including data about safety failures, defects, or conditions; and
- Verifies safety performance and validate the effectiveness of safety risk mitigation activities.

Safety Performance Monitoring and Measurement:

The Authority utilizes the following processes and activities to monitor its entire transit system for compliance with operations and maintenance procedures, including:

- Safety audits (Training, safety committee meeting minutes);
- Informal inspections;
- Monitoring operational and maintenance data (Dispatch logs, TAM Fleet/Facility Inspections);
- Assess external information (Industry, DOT, NTD, insurance, customer complaints);
- Regular review of onboard camera footage to assess drivers and specific incidents;
- Conduct safety surveys (Driver and passenger);
- Assess the ESRP (Number and type of complaints);
- Conduct evaluations of the SMS (Are we safer?);
- Investigation of safety occurrences (Accident reports. Both reported events and near misses);
- Safety review prior to the launch or modification of any facet of service (Tabletop exercise);
- Daily data gathering and monitoring of data related to the delivery of service (including field observations); and
- Regular vehicle inspections and preventative maintenance (TAM, Ecolane, FRITS, and Dossier reports).

These activities are designed to support safety oversight and performance monitoring, with data and physically observable standards being critical to the safety assurance methodology. The results from the above processes are compared against recent performance trends quarterly and annually by the Authority CSO to determine where action needs to be taken. The CSO enters any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for reevaluation by the Authority Safety Committee, as applicable. Annual monitoring of operations and maintenance activities shall take place each May of the calendar year.

Monitoring the Effectiveness of Safety Risk Mitigations:

The Authority monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The CSO maintains a list of safety risk mitigations in the safety risk register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

By its very nature, the SMS generates data and information that the Authority's CSO and senior management needs in order to evaluate whether implemented safety risk mitigations are appropriate and effective and how well the Authority's safety performance is in line with established safety objectives and safety performance targets. Safety performance monitoring does not focus on monitoring individuals, but rather monitoring the safety performance of the Authority, itself, through routine monitoring of operations, training, and maintenance activities.

The Authority Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate director, manager, or supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports; conducting job performance observations; or other activities. The CSO will endeavor to make use of existing Authority processes and activities before assigning new information collection activities.

The Authority CSO may consult with the safety committee, as applicable, to review the performance of individual safety risk mitigations during monthly safety committee meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the CSO will propose a course of action to modify the mitigation or take other action to manage the safety risk. The CSO will approve or modify this proposed course of action and oversee its execution.

The CSO shall monitor the Authority's operations on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by the following methods:

- Reviewing results from accident, incident, and occurrence investigations and reports;
- Review of CCTV video footage;
- Monitoring of the Employee Safety Reporting Program;
- Reviewing results of internal safety audits and inspections; and
- Analyzing operational and safety data to identify emerging safety concerns.

The Authority CSO coordinates with the safety committee (as applicable) and Accountable Executive to carry out and document all monitoring activities.

Investigations of Safety Events to Identify Causal Factors:

The Authority maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event. These procedures also reflect all traffic safety reporting and investigation requirements established PennDOT.

The CSO maintains all documentation of the Authority's investigation policies, processes, forms, checklists, activities, and results. When an investigation is commissioned by the CSO, the following causal factors shall be analyzed

to identify causal factors, as displayed in Table 6.1. Using table 6.1, the CSO shall conduct the investigation and gather data using the following resources:

- Physical in-person interviews with all involved actors;
- Review of CCTV video footage;
- Review of Accident/Incident/Police Reports;
- Review of service delivery activities (field observations);
- Review of operational, training, and maintenance data;
- Development of simulated physical event using a tabletop exercise;
- Development of mitigation and communication strategy; and
- Development of training update/implementation.

Table 6.1

Safety Assurance Event Investigation Causal Factor Analysis Form			
Causal Factor	Contributing Factor Present (Y/N)	Describe Causal Events Leading to Event	Describe the Mitigation Strategy for Causal Event
Operator Error			
Operator Fitness for Duty			
Operator Action(s)			
Vehicle Condition			
Road Conditions			
Weather Conditions			
Passenger/Public Contribution			
Training/Policy Deficiency			
Existing Mitigation Failure			
External Conditions/Factors (other)			
Event Type:		Event Date:	Investigator:
Investigation Start Date:		Event Location:	LCTA Division:
Investigation End Date:			Incident Number:
Investigation Review Dates:			

Upon completion of the investigation process, the Authority CSO shall draft a written investigation report. The CSO shall determine in this report whether:

- The accident was preventable or non-preventable;
- Personnel require discipline or retraining;
- The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event; and
- The accident appears to involve underlying organizational causal factors beyond just individual employee behavior.

The Authority CSO shall meet with the applicable employees, union representatives and managers to discuss any facets of the investigation that identified causal factors, and mitigation/training/monitoring/communication strategies. Finally, upon the investigation close out or ongoing monitoring, the safety hazard/event database shall be updated. If an ongoing training or mitigation phase it implemented, the review schedule shall also be documented by the CSO.

ESRP Information Monitoring Activities:

The Authority’s Employee Safety Reporting Program (ESRP) is essential to the safety assurance function. The safety assurance process also helps the Authority evaluate whether an anticipated change may affect the safety of operations. There are six steps to the ESRP management:

1. **Ease of Reporting:** Events/circumstances reported shall be accurate and concise by utilizing a format and reporting medium that is simple to use and devoid of complicated requisites.

2. **Storage:** The CSO has implemented a storage system that is standardized in its application, while allowing for ease of access.
3. **Analysis:** The format used to collect, store and analyze data allows for the user to make informed decisions.
4. **Information Exchange:** Data and subsequent reporting derived from the ESRP allows for the creation and development of mitigation strategies that are based on actual and factual evidence.
5. **Feedback:** Timely, accessible, and informative feedback motivates reporters by showing that the Authority values the time and effort involved in submitting a report.
6. **Protection of Information:** All information submitted in a report is confidential in nature, and must not be used for purposes other than those for which it was collected. All information shall be documented and stored in a secure, password-protected or key locked, location.

The Authority’s safety concern reporting form has a built-in internal monitoring mechanism in place, via a carbon copy of the form, which assures a safety concern is reported to multiple Authority managers when an employee submits the form. When an employee submits the safety concern reporting form, the following employees receive a copy within 24 hours or by the start of the next shift: The reporting employee, the director of operations, the employee’s immediate supervisor/ applicable department manager, safety committee file.

Next, the Authority CSO will enter the reported information into the safety concern/event tracking database within 24 hours of receipt. All safety concerns shall have the investigation started within 48 hours of receipt. All safety concerns shall be closed within 30 days of receipt, or continually monitored and updated every 30 days until deemed closed. If an anticipated change is determined to introduce safety risk, the Authority shall conduct safety risk management activities, via a tabletop exercise, to minimize the safety risk associated with the change via a simulation.

Additionally, the Authority CSO shall routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the CSO and safety committee ensure that the concerns are investigated or analyzed through the Authority’s SRM process.

Last, the Authority CSO shall also review internal and external reviews, including audits and assessments, with findings concerning the Authority’s safety performance targets, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.

NOTE: *In the event of a fatality, the Authority must comply with all FTA drug and alcohol requirements and 75 Pa. C.S. Section 4704. Pursuant to the Commonwealth statute, in the event a motor carrier vehicle or mass transit vehicle is involved in an accident that causes the death of the vehicle operator or another person, the motor carrier vehicle or mass transit vehicle and its equipment, load, driver and documents shall be inspected by a qualified Commonwealth employee as designated by 75 Pa. C.S. Section 4704 before the vehicle or driver will be allowed to continue operation. The LCTA Executive Director or designee will contact the nearest PUC District Office to request a post-accident MCSAP bus inspection. The following table lists PUC District Offices:*

PUC District Office	Manager	Telephone	Fax
Harrisburg District	Andrew Turriziani	717.787.7598	717.787.3114
Philadelphia District	Anthony Bianco	215.965.3721	215.965.4262
Pittsburgh District	Kimberly Johnston	412.423.9310	412.820.2607
Scranton District	Andrew Turriziani	570.963.4590	570.614.2070

SECTION 7: SAFETY PROMOTION

The safety promotion component requires a combination of competency training and communication of safety information to employees that will enhance the Authority's safety performance. The Authority has established competencies and training for all agency personnel directly responsible for safety, and to establish and maintain the means for communicating safety performance and safety management information. This training program contains both new-hire and refresher training, as necessary.

Competencies and Training:

In accordance with 49 C.F.R. Part 672, the Authority shall require voluntary compliance of the Authority's Chief Safety Officer (CSO) to complete and maintain credentialing via the online safety training curriculum (or equivalent), as specified by the FTA Public Transportation Safety Certification Training Program on or by the effective date of this document, or within 60 days of appointment:

- SMS Awareness
- Safety Assurance
- SMS Principles for Transit

The development of safety training curricula and courses meet the following criteria:

- Perform an analysis to identify critical safety training needs, scheduling, and determine Authority personnel to receive training;
- Design the curriculum for both initial new-hire and refresher training, in order to establish training tasks, competencies, qualification standards, and evaluation criteria for performance measurement;
- Develop the curriculum delivery method (filed, classroom, online), lessons, exercises, activities, tests, and evaluations;
- Implement the training curriculum, and document all training records for future analysis in revising training materials.

The delivery of safety training programs utilized by the Authority may include both in-house training systems, and/or contracted training entities, defined as:

- In-House Training Program: A combination of classroom, on-line, self-directed study, workshops, seminars, lunch-and-learn and/or toolbox talks, presented by the Authority personnel.
- Contracted Training Program: A combination of classroom and/or online training, presented by a third party.

The Authority dedicates resources to conduct a comprehensive safety training program, as well as training on SMS roles and responsibilities. The scope of the safety training, including both new-hire and annual refresher training, is appropriate to each employee's individual safety-related job responsibilities and their role in the SMS, as detailed in Table 7.1.

Table 7.1

LCTA Personnel Competency and Training Requirements		
All Employees	Managers & Supervisors	Senior Management & Officials
Everyone needs to be trained and educated on the SMS.	Managers and Supervisors need training on safety data management.	Management & leadership commitment.
<ul style="list-style-type: none"> • Understanding of safety performance targets. 	<ul style="list-style-type: none"> • Analyze safety data. • Extract information from safety data. 	<ul style="list-style-type: none"> • Shows commitment by ensuring resources are sufficient to carry out an effective safety management training program.
<ul style="list-style-type: none"> • Fundamentals of SMS. 	<ul style="list-style-type: none"> • Look for trends from data reported. 	
<ul style="list-style-type: none"> • Safety reporting. 	<ul style="list-style-type: none"> • Commitment to SMS Process. 	
<ul style="list-style-type: none"> • Individual roles within SMS. 		

The Authority’s comprehensive safety training program applies to all employees in their duty to be directly responsible for safety, including the following job groups:

- Bus & revenue vehicle operators;
- Dispatchers & Spotters;
- Maintenance technicians;
- Managers and supervisors;
- Administrative staff;
- Agency Leadership, Officials and Executive Management;
- Chief Safety Officer; and
- Accountable Executive.

The Authority Accountable Executive, agency leadership, and executive management team must complete the FTA SMS Awareness online training module presented by TSI (<https://tsi-dot.csod.com/>).

Operations safety-related skill training includes the following:

- New-hire bus and paratransit vehicle operator classroom and hands-on skill training;
- Bus and paratransit vehicle operator refresher training;
- Bus and paratransit vehicle operator retraining (recertification or return to work);
- Classroom and on-the-job training for dispatchers;
- Classroom and on-the-job training for operations supervisors and managers; and
- Accident investigation training for operations supervisors and managers.

Transit vehicle maintenance safety-related skill training includes the following:

- Ongoing vehicle maintenance technician skill training;
- Ongoing skill training for vehicle maintenance supervisors;
- Accident investigation training for vehicle maintenance supervisors;
- Ongoing hazardous material training for vehicle maintenance technicians and supervisors; and
- Training provided by vendors.

Safety Communication:

The Authority shall communicate safety and safety performance information throughout the organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through an employee safety reporting program.

Specifically, the Authority CSO and Human Resources Manager shall coordinate the agency's safety communication activities for the SMS. These activities focus on the three categories of communication activity established in 49 CFR Part 673 (Part 673):

- **Communicating safety and safety performance information throughout the agency:** The Authority communicates information on safety and safety performance in its monthly safety committee meetings and bi-monthly senior staff meetings. The Authority also has a permanent agenda item in all monthly safety committee meetings. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact Authority service or safety performance, and updates regarding SMS implementation. The Authority also requests information from drivers during these meetings, which is recorded in meeting minutes. Finally, the Authority Human Resources Manager and CSO posts safety bulletins and flyers on the bulletin boards located in all bus operator and maintenance technician break rooms, advertising safety messages and promoting awareness of safety issues. The efficient and effective distribution of safety information should answer six main questions:
 1. What is the information being communicated;
 2. Who is your audience (target);
 3. Why is this being communicated (purpose);
 4. Where is it being communicated (identify the best venues);
 5. When will it be communicated (identify the timing and frequency); and
 6. How will it be communicated (identify the best mediums and format).

The process of safety communication is a two-way feedback loop between frontline employees and management about safety information in establishing a positive safety culture. Thus, all employees are instructed to file a formal safety concern form (SCF) with their immediate supervisor. Within one business day, the supervisor must supply the safety concern form to the Authority's Chief Safety Officer. Upon receipt of the (SCF), the CSO shall enter the hazard information into the Safety Concern/incident tracking spreadsheet. Next, an investigation into the safety concern/incident shall take place. This way of communication makes Authority personnel aware of safety priorities and initiatives, and ensures that feedback is captured and acted upon as appropriate.

The platforms and tools used for agency-wide safety communications include:

- The Safety Management Policy Statement;
- Safety Reporting & Communications Bulletin Board;
- Safety meetings;
- Electronic, audio, and/or video, hardcopy distribution;
- Web-based, intranet, podcasts, or social media;
- Safety bulletins, notices, policies, and posters;
- CDs and DVDs;
- Newsletters;
- Briefings, seminars, and workshops; and
- Formally documented sign-off sheets.

- **Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency:** As part of new-hire training, the Authority distributes safety policies and procedures, included in the Employee Handbook, to all employees. The Authority provides training on these policies and procedures and discusses them during safety talks between supervisors and bus operators and vehicle maintenance technicians. For newly emerging issues or safety events at the agency, the Authority Chief Safety Officer issues bulletins or messages to employees that are reinforced by supervisors in one-on-one or group discussions with employees.

Safety-related information shall be actively and routinely communicated, and must focus on raising awareness of hazards and potential safety risks. Potential sources for safety topics and information include, but are not limited to:

- Investigation results from accidents and incidents;
- Close calls/near miss reporting;
- Hazard(s) identified through employee safety reporting;
- Observations from routine safety inspections and audits; and
- Similar information from other agencies and government oversight agencies.

There are three levels of identifiable hazards, each with its own emergency communication protocols detailed below:

1. **Level 1 (High):** Immediate Hazard Condition. Communication is needed on a mass scale to alert all employees in the least amount of time as an immediate need.
2. **Level 2 (Medium):** High Safety Alert. Communication is needed on a mass scale to applicable employees in an efficient amount of time.
3. **Level 3 (Low):** General Safety Alert. Communication is needed on a reduced scale to alert applicable employees in a static amount of time.

Once a safety hazard level is identified, depending on the severity and nature of the hazard, the CSO shall communicate information about the hazard to applicable employees in the following manner:

- Utilize the dispatch radio system to alert employees who are out in the field operating a vehicle (Level 1).
- Utilize the facility PA system to alert administrative, office, maintenance, and employees stationed at the facility of an immediate hazard (Level 1).
- Utilize an email message to alert applicable employees of a hazard (Level 2 or 3).
- Utilize a verbal message from the CSO or immediate supervisor to the applicable employee department(s) upon reporting to work or learning of a hazard (Level 1, 2 or 3).
- Utilize a written memo from the CSO to each immediate supervisor or dispatcher to share with the applicable employee. The written memo will appear either as an individually addressed letter to all employees, or the memo will appear at the dispatch office memo board. Upon the employee's report time, the dispatcher on duty will instruct the operations employee to review the daily safety memo board (Level 3).

- **Informing employees of safety actions taken in response to reports submitted through the ESRP:** The Authority provides targeted communications to inform employees of safety actions taken in response to reports submitted through the ESRP, including handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors.

The Authority shall host regular discussion of safety concerns, at its monthly safety committee meeting in order to promote an environment that encourages employees to report concerns, and demonstrates management commitment to both the employees and the agency's safety performance objectives.

Authority safety committee meetings shall take place on the last Tuesday of each month. A meeting schedule to the year shall be posted in employee common areas. Safety committee meetings shall have recorded minutes, and a report issued at the conclusion of each meeting for review by all Authority staff. The Authority safety committee shall maintain compliance certification from HARIE on an annual basis. These reports shall be retained via an electronic folder on the Authority's intranet. A monthly report of the safety committee meeting minutes shall be submitted by the CSO to both the Authority Accountable Executive and the Authority Board of Directors.

Safety committee meetings are open to all Authority employees to participate. The agenda for each meeting shall allow for a monthly progress review of all safety hazard complaints and incidents reported to date. Those in attendance shall also have the opportunity to submit new safety hazard complaints for the CSO and Safety committee to intake and review.

SECTION 8: SUPPORTING DOCUMENTATION

Pursuant to 49 CFR Part 673.31, The Luzerne County Transportation Authority shall maintain records of its documents that are developed in accordance with this policy and FTA requirements. The DOT/FTA expects a transit agency to maintain documents that set forth its agency safety plan, including those related to the implementation of its SMS such as the results from SMS processes and activities. For the purpose of reviews, investigations, audits, or other purposes, this section requires the transit agency to make these documents available to PennDOT, FTA, and other Federal agencies as appropriate. The Authority shall maintain these documents for a minimum of three years. Documents shall also be retained and disposed of within the regulatory schedules specified by the Commonwealth of Pennsylvania Historical & Museum Commission Municipal Records Manual (<https://www.phmc.pa.gov/Archives/Records-Management/Documents/2019-Municipal-Records-Manual-rev-with-links.pdf>).

Additionally, Section 8 of this document shall also serve as the appendix for exhibits, charts and tables featured and/or referenced in this safety plan.

Item 8.1: LCTA Risk Assessment Matrix

LCTA RISK ASSESSMENT MATRIX					
PROBABILITY		SEVERITY			
		1. Catastrophic	2. Critical	3. Marginal	4. Negligible
a. Frequent	High	High (1a)	High (2a)	Serious (3a)	Medium (4a)
b. Probable		High (1b)	High (2b)	Serious (3b)	Medium (4b)
c. Occasional	Medium	High (1c)	Serious (2c)	Medium (3c)	Low (4c)
d. Remote	Low	Serious (1d)	Medium (2d)	Medium (3d)	Low (4d)
e. Improbable		Medium (1e)	Medium (2e)	Medium (3e)	Low (4e)
f. Eliminated		Eliminated			

RESOLUTION REQUIREMENTS			
High	High	Unacceptable	Correction required due to existing conditions.
Serious		Undesirable	Correction may be required due to existing conditions, decision by management.
Medium	Medium	Acceptable w/ Review	Acceptable with review, monitoring, and documentation by management.
Low	Low	Acceptable	Acceptable under existing circumstances, without review.
Eliminated		Acceptable	Acceptable under existing circumstances, no action needed.

CONDITION/CONSEQUENCE PROBABILITY & FREQUENCY TABLE					
Probability Level		Likelihood of event in specific item	MTBE* Operating Hours	Occurrence in Time	Occurrence Description
a. Frequent	High	Will occur frequently.	Less than 1,000 OH	1 per month	Continuously experienced.
b. Probable		Will occur several times.	1,000 to 100,000 OH	> 1 per year	Will likely occur.
c. Occasional	Medium	Likely to occur sometimes.	100,000 to 1,000,000 OH	1 per 2 years	Will occur several times.
d. Remote	Low	Unlikely, but possible to occur.	1,000,000 to 100,000,000 OH	1 per 5 years	Unlikely, but can be expected to occur.
e. Improbable		So unlikely, occur may not be experienced.	Greater than 100,000,000 OH	1 per 10 years	Unlikely to occur, but possible.
f. Eliminate		Risk removed / eliminated.	Never	N/A	Will not occur.

*Mean Time Between Events: The likelihood that hazards will be experienced during the planned life expectancy of the system. Can Be estimated in potential occurrences per unit of time, events, population, items, or activity.

SAFETY HAZARD CONSEQUENCES and SEVERITY CRITERIA	
Consequences	Severity Criteria Categories
Death	Number of fatalities, types of fatalities, priority given to fatalities under specific conditions (i.e, striking passengers, pedestrians or bicyclists vs. trespassers).
Injury	Number of injuries, types of injuries, priority for passenger and employee injuries or other injuries, full or partial disability, hospitalization, lost workdays.
Illness	Full or partial disability, hospitalization, lost workdays.
Property Damage	Range of dollar values, total or partial destruction of vehicle or infrastructure element of a public transportation system.
Loss of Service & Facilities	System-wide shutdown, partial shutdown, significant limitations on service. Loss of facilities, rolling stock, equipment, or infrastructure of a public transportation system.
Damage to the Environment	Extent of damage (reversible, reversible with mitigations, irreversible), legal determination regarding failure to comply with environmental regulations.

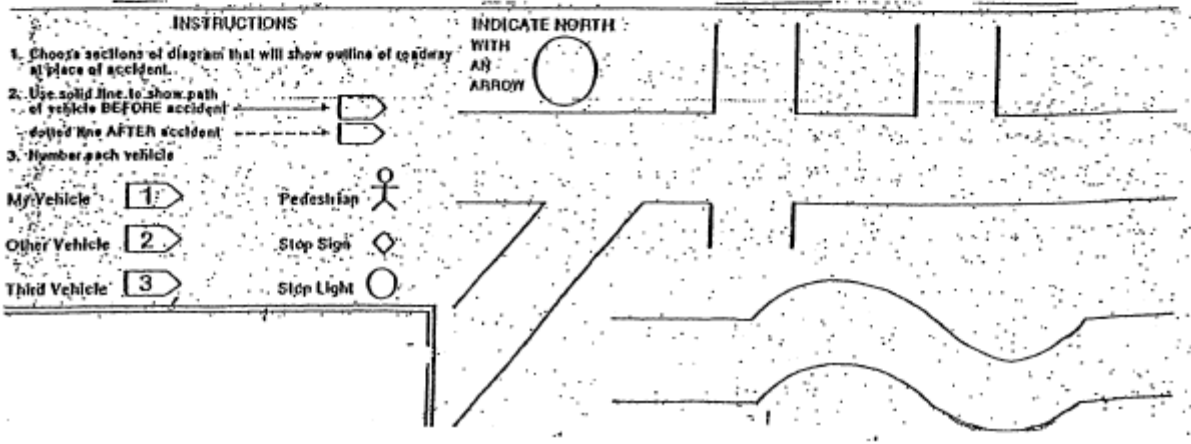
CONDITION/EVENT SEVERITY LEVEL SCALE				
Severity Level	1. Catastrophic	2. Critical	3. Marginal	4. Negligible
System Disruption	Greater than 24 Hours	12 to 24 Hours	4 to 12 Hours	Less than 4 Hours
Service/ Operation	Substantial or total loss of operation.	Partial shutdown of operation.	Brief disruption to operation.	No disruption to operations.
People	Mass casualty incident with major loss of life.	Some fatalities or major critical injuries requiring immediate medical	Minor injuries requiring immediate medical attention.	No or some minor injuries, not requiring medical attention.
Financial	Greater than \$1,000,000.	Less than \$1,000,000.	Less than \$250,000.	Less than \$100,000.
Legal and Regulatory	Significant breach of the law. Individual or agency law suits.	Breach of law; report/investigation by authority. Attracts compensation/penalties/enforcement action.	Breach of regulatory requirements; report/involvement of authority. Attracts administrative fine.	Technical non-compliance. No warning received; no regulatory reporting required.
Environmental	Permanent impact; affects a whole region; highly sensitive environment.	Lasting months; impact on an extended area; area with some environmental sensitivity.	Lasting weeks; reduced area; no environmentally sensitive surroundings.	Lasting days or less; limited to small area; low significance/sensitivity.
Social	Major widespread social impacts.	Significant, ongoing social issues.	Some impacts on local population, mostly repairable.	Minor disturbance of cultural/social structures.
Reputation & Public Relations	Noticeable reputational damage; national/international public attention and repercussions.	Suspected reputational damage; local/regional concern and reactions.	Limited, local impact; concern/complaints from certain groups/organizations.	Minor impact, awareness/concern from specific individuals.
Injury	Death (Not including suicides or by natural causes.)	Fracture, Severe Bleeding, Brain injury, Dismemberment.	Bruising, Abrasions, Bleeding (Ambulance transport)	Bruising, Abrasions, Sprains (No Ambulance transport)
Emergency Management	Major widespread impacts.(No supplies, no service, curfew, martial law)	Significant, ongoing issues. (Lack of supplies, martial law)	Some impacts on local population, able to be mitigated and recover.	Minor or short-term disturbance of effected area.
Health	Exposure with irreversible impacts with loss of life of a numerous group/populations or multiple fatalities.	Exposure with irreversible impact on health with loss of quality of life or single fatality.	Exposure with reversible impacts on health or permanent change with no disability or loss of quality of life.	Exposure to health hazard resulting in symptoms requiring medical intervention, with full recovery.
Safety	Severe accident with major service disruption or loss of life; Potential Federal agency involvement, damages over \$250,000.	Accident with serious injuries, damages exceed \$100,000.	Reportable accident with over \$25,000 in damages.	Incident with minor damage.
Technology & Infrastructure	Critical technology and infrastructure cannot be accessed via primary infrastructure, which includes data and major fiscal loss.	Critical infrastructure and technology has an outage, but agency can restore services at the primary datacenter site in an allotted SLA timeframe. Causing operations and fiscal loss.	Critical Infrastructure and technology has an outage, but the agency can restore services at the primary datacenter site in an allotted SLA timeframe. Causing no operations or fiscal loss.	Critical infrastructure and technology systems not on list, has a brief outage that is not noticed by the users, nor affects any Operation, or causes fiscal loss.
Information Security	A breach of customer, Authority employee information, network infrastructure or security systems:			
	Where PII/PCI data is exposed/accessed by malware, viruses or ransomware, an external or internal hacker, employee abusing trusted elevated permissions and breach is of non-encrypted data or cause the encryption of data causing data loss.	Where no PII/PCI data is exposed/accessed by malware, virus or ransomware, an external or internal hacker, employee abusing trusted elevated permissions and breach is of non-encrypted data or cause the encryption of data. Data is recoverable by backup.	Where no PII/PCI data is exposed/accessed by malware, virus or ransomware, an external or internal hacker, employee abusing trusted elevated permissions and breach is of non-encrypted data information, but quickly fail over to backup site.	Malware or other type of virus is identified on a PC, Server, or another network node, but does not affect any process nor accesses data, and is quickly eliminated.
Security/ Law Enforcement	Criminal or terrorism attack of system resulting in death or serious bodily harm to customers. Violent attack /terrorism at Authority business unity or administrative/maintenance facility with grave loss of life or significant bodily harm to multiple employees and/or civilians.	Non-life-threatening workplace violence incident or significant targeted criminal damage to business unit facilities, or Authority critical infrastructure.	Suspicious package resulting in minor system delays; or trespasser (suicide) within or on the system (classified as security incident).	Assault of employee or customer; minor criminal activity on system or at a business unit/administrative facility.

Item 8.6: LCTA Employee Accident Report Form

EMPLOYEE ACCIDENT REPORT

Name: _____
 Driver License # _____ D.O.B. _____
 Accident Date: _____ Time: _____ AM / PM
 Time Dispatch Called: _____ AM / PM
 Vehicle # _____ Plate # _____ VIN # _____
 Job # _____ Rte # _____ Direction: Outbound / Inbound
 Location of Accident: _____

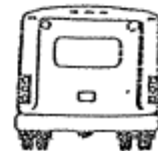
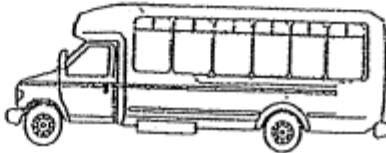
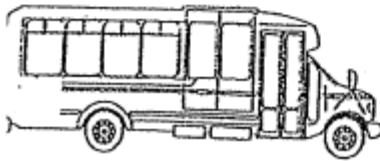
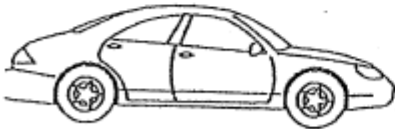
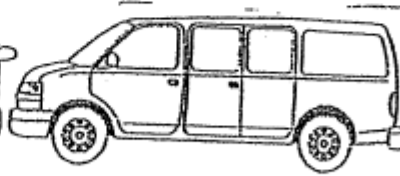
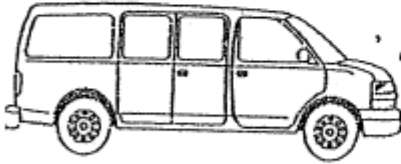
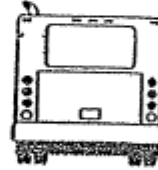
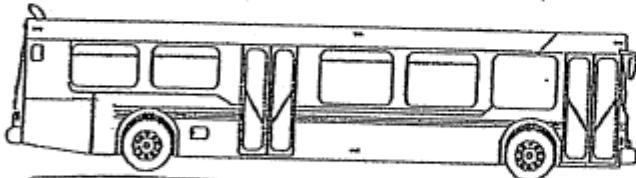
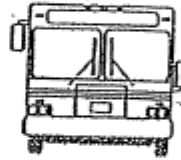
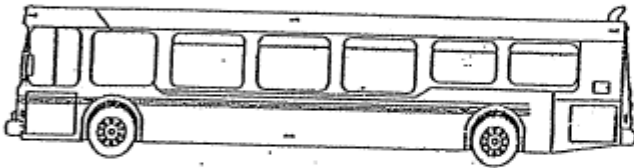
Police Dept Called: _____
 Circle All That Apply: Revenue Service / Deadhead / Bus Swap
 Customer Service / Maint / Admin / Road Supervision
 Number of Injuries: Bus Passengers _____ Other Vehicle _____
 Outside Party _____ Employee _____
 Weather Conditions _____ Road Condition _____



DESCRIBE DAMAGE TO LCTA VEHICLE:

DESCRIBE DAMAGE TO OTHER VEHICLE:

CIRCLE THE POINT OF CONTACT ON BOTH VEHICLES BELOW



OTHER PARTIES INVOLVED IN EVENT

Circle One: Vehicle Driver Vehicle Passenger Bus Passenger Pedestrian Property Owner Bicyclist

Last Name:		First:		Middle:	
Address:		City:		County:	
State:		Zip Code:			
Home Phone #					
Vehicle Make:		Model:	Year:	Color:	Lic. Plate # & State:
Driver's License #			State:	Date of Birth:	
Insurance Company:				Policy #	
Registered Owner's Name (if different from above) Last:					First:
					MI.
Address:		City:		County:	
State:		Zip Code:			
Home Phone #		Work Phone & ext. #			
Insurance Company:		Agency:		Policy #	

Circle One: Vehicle Driver Vehicle Passenger Bus Passenger Pedestrian Property Owner Bicyclist

Last Name:		First:		Middle:	
Address:		City:		County:	
State:		Zip Code:			
Home Phone #					
Vehicle Make:		Model:	Year:	Color:	Lic. Plate # & State:
Driver's License #			State:	Date of Birth:	
Insurance Company:				Policy #	
Registered Owner's Name (if different from above) Last:					First:
					MI.
Address:		City:		County:	
State:		Zip Code:			
Home Phone #		Work Phone & ext. #			
Insurance Company:		Agency:		Policy #	

PASSENGER INFORMATION CARD

DATE: _____

YOUR NAME: _____

ADDRESS: _____

PHONE: () _____

ARE YOU HURT? NO YES

IF YOU WERE HURT, PLEASE DESCRIBE YOUR INJURY:

DID YOU SEE THE ACCIDENT HAPPEN? _____

DESCRIBE WHAT HAPPENED: _____

SITTING STANDING

WERE YOU SITTING OR STANDING (CIRCLE ONE). PLEASE

MARK (X) YOUR APPROXIMATE LOCATION ON THE BUS.

DOOR			
	FRONT	MIDDLE	REAR
DRIVER			

SIGNATURE _____

Thank You!

Item 8.7: LCTA Transit Vehicle Pre-Trip Inspection Report Form

<u>Pre-Trip Inspection:</u>	<u>Bus Number:</u>
Interior	Exterior
___ AVL Login	___ Low Beams
___ Fare Box Check	___ High Beams
___ Horn	___ Brake Lights
___ Door Controls	___ Marker and DOT Lights
___ A/C & Heat Controls	___ Windshield/ Glass / Cracks
___ Defroster Operation	___ Mirrors/ Set for Driver/Loose/Crack
___ Wipers	___ Tires/Wheels/Cracks/Lug nuts
___ Washer Fluid	___ Body Damage
___ Destination Sign	___ Turn Signals
___ WC Lift	___ Bike Rack (Working Order?)
___ WC Restraints	Notes: _____
___ Fire Extinguisher	_____
___ Registration & Insurance Card	_____
___ Seats	_____
___ Camera/Monitor	_____
___ Vent Hatch	_____
___ Emergency Window Release	_____
___ Stop Signal	
___ Brake Test	

PRINT NAME _____

OPERATOR SIGNATURE: _____ DATE: _____

(THIS MUST BE TURNED IN BEFORE STARTING SHIFT!)

Item 8.8: LCTA Transit Vehicle Technology Defect Report (AVL/FRITS/EcoLane)

Luzerne County Transportation Authority

TECHNOLOGY DEFECT REPORT

Bus No:	Date:
Job:	Route:

AVL / OBU

- OBU does not turn on (blank screen)
- OBU does not turn on (blue screen with words)
- Cannot login (passcode incorrect)
- Jobs are wrong or missing
- Turn-by-turn is wrong
- There is a problem with a stop
- There is a different problem with the AVL / OBU

Destination Signs

- Sign code is wrong or missing
- Destination names are wrong or missing
- Incorrect spelling or unreadable abbreviations
- There is a different problem with the signs

Which sign code has the problem?

Comments:

Item 8.10: LCTA Employee Safety Reporting Program (ESRP) Safety Concern Reporting Form



Safety Concerns #SC 0297



Location of Safety Concern: _____

Employee Name (Please Print): _____

Signature: _____ Date: _____

Please fill out and return to: Becky Dennis @ Shared Ride
 Rich McNeil @ LCTA

Employee Copy

Item 8.11: LCTA Near Miss Incident Report Form



Near Miss Incident Report Form

A near miss is an unplanned potentially hazardous incident, event, or condition that has not resulted in an injury, illness or damage. Other familiar terms for these events are a “close call,” a “narrow escape,” or in the case of moving objects, “near collision” or a “near hit.” It is everyone’s responsibility to report any potential hazards immediately. Please use this form to report near-misses and assist us in preventing future incidents and in making the LCTA a safer workplace.

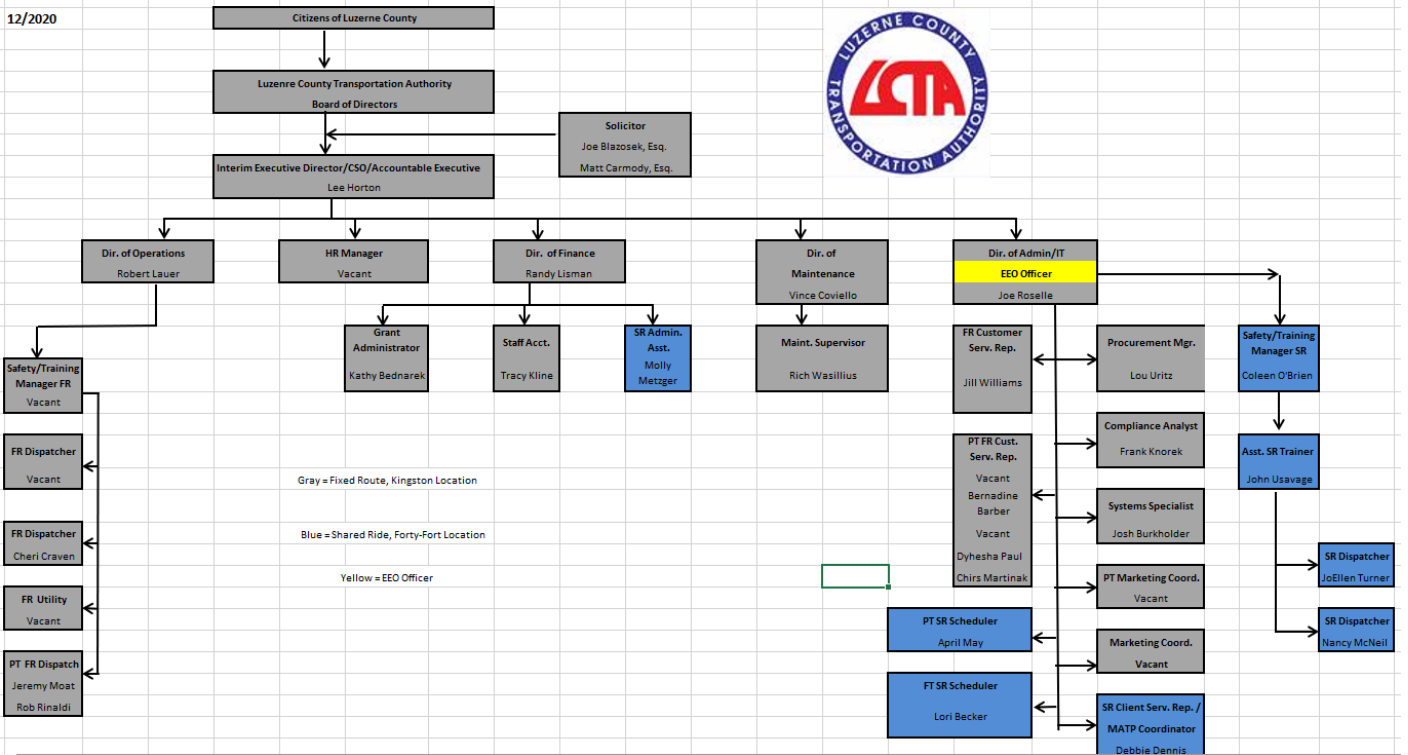
LCTA Work Department:	Incident Location:
Date of Incident:	Time of Incident:
Type of Incident: <input type="checkbox"/> Unsafe Act. <input type="checkbox"/> Unsafe condition of equipment. <input type="checkbox"/> Missed collision. <input type="checkbox"/> Unsafe condition of area. <input type="checkbox"/> Unsafe use of equipment. <input type="checkbox"/> Other (describe):	
Describe the potentially hazardous incident/condition, possible outcome, and safety suggestion (in as much detail as possible):	
Employee Name and Title:	Phone Number:
LCTA Email Address (if applicable):	Date Reported:

Submit this completed form to the LCTA Chief Safety Officer.

Item 8.12: LCTA Organizational Chart (12/2020)

Administrative Organizational Chart

12/2020



Item 8.13: PennDOT LCTA ASP Self-Certification Letter

SHARED RIDE
2009 WYOMING AVE.
FORTY FORT, PA 18704
(570) 288-8420
FAX (570) 288-7455



FIXED ROUTE
315 NORTHAMPTON ST.
KINGSTON, PA 18704
(570) 288-9356
FAX (570) 288-7327
www.lctabus.com

April 20, 2020

Nicholas Baldwin, Program Manager
Bureau of Public Transportation
P.O. Box 3151
Harrisburg, PA 17105-3151

Re: Public Transportation Agency Safety Plan (PTASP)

Dear Mr. Baldwin:

The Federal Transit Administration (FTA) Public Transportation Agency Safety Plan regulation, at 49 CFR Part 673, requires State Departments of Transportation (DOTs) to draft and certify Agency Safety Plans (ASPs) on behalf of small public transportation providers. However, a State DOT is not required to draft an ASP for a small public transportation provider if the small transit provider notifies the State that it will draft its own plan.

This letter serves to notify the Pennsylvania Department of Transportation that the Luzerne County Transportation Authority (LCTA) will draft and certify its own ASP to address Part 673 requirements. The ASP will be signed by the Accountable Executive, Mr. Lee Horton, Interim Executive Director, and approved by the LCTA Board of Directors.

Sincerely,

A handwritten signature in black ink that reads "LEE HORTON". The signature is written in a cursive, slightly slanted style.

Lee Horton, Interim Executive Director and Accountable Executive
Luzerne County Transportation Authority

Item 8.14: Authority Board PTASP Adoption Resolution (December 1, 2020)

**RESOLUTION TO APPROVE PUBLIC TRANSPORTATION
AGENCY SAFETY PLAN FOR LCTA**

WHEREAS, the Federal Transit Administration has regulations applicable to the Luzerne County Transportation Authority hereinafter, LCTA, pertaining to the formulation, , adoption, and implementation of a public transportation agency safety plan, hereinafter PTASP; and

WHEREAS, the LCTA provides public transit service through its fixed route and shared ride divisions within designated areas of Luzerne County; and

WHEREAS, the PTASP contains performance targets, management policy, risk management, assurances and promotions of the implementation for a plan for safety in the operation of LCTA vehicles and maintenance and operation of facilities; and


WHEREAS, the Board has reviewed the PTASP and has determined that it addresses the necessary requirements set forth by the Federal Transit Administration and further determines that said plan by LCTA establishes a safety program for use by LCTA in its provision of public transit service;

NOW THEREFORE, the Board of the Luzerne County Transportation Authority hereby approves the PTASP, a copy of which is attached to this resolution, and further directs the management of the authority to implement the provisions contained in the plan and to provide the necessary certifications to Federal and State Agencies of the approval of the plan and its implementation by the Luzerne County Transportation Authority.

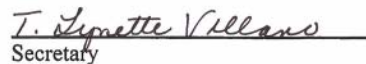
Attest:

By:





Board Chairman



Secretary

Item 8.15: Authority Board Meeting Agenda (December 1, 2020)



**LUZERNE COUNTY TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS MEETING**

**AGENDA
December 1, 2020**

Charles Sciandra - Chair	Lynette Villano - Secretary	Dennis Driscoll
Michael Cefalo - Vice Chair	Valerie Kepner Ph.D - Treasurer	Thomas Bindus
Joe Padavan - Asst. Treasurer	Gary Polakoski - Asst. Secretary	John Young
Solicitor - Atty. Joseph Blazosek		Asst. Solicitor – Atty. Matt Carmody
Interim Executive Director – Lee Horton		

WORK SESSION 4:00 pm.

Action Items & Discussion Items:

1. Health Care for 2021
2. LCTA Public Transportation Safety Plan
3. Part Time Employee pay Increase
4. Wilkes-Barre City to sponsor LSA Grant

Executive Sessions, if needed, will take place after the work session and before the voting session.

VOTING SESSION 5:00 pm

1. PLEDGE OF ALLEGIANCE – Chair Charles Sciandra
2. ROLL CALL
3. PUBLIC COMMENT
4. APPROVAL OF MINUTES – October 20th 2020 Minutes
5. TREASURERS REPORT – Valerie Kepner Ph.D.
6. CHAIRMAN’S REPORT – Charles Sciandra
7. SOLICITOR’S REPORT- Attorney Joseph Blazosek
8. EXECUTIVE DIRECTORS REPORT – Interim Executive Director Lee Horton (written report) Attachment A

ACTION & FORMAL ITEMS:

1. Motion to approve the Highmark / Benistar healthcare plans
2. Motion to approve the LCTA Public Transportation Safety Plan
3. Motion to approve the Part Time Employee pay Increase

9. BOARD COMMITTEE REPORTS:

PUBLIC TRANSIT RIDERSHIP FORUM COMMITTEE- Dr. Valerie Kepner
 SAFETY COMMITTEE-
 STRATEGIC PLANNING COMMITTEE– Mr. Cefalo
 HEALTH & PENSION – Mr. Joseph Padavan
 OPERATIONS – Mr. Gary Polakoski
 PERSONNEL COMMITTEE – Mr. Joseph Padavan

10. OLD BUSINESS

1. Murray Complex Update and New Building Update

11. NEW BUSINESS
12. REMARKS
13. ADJOURNMENT

SECTION 9: DEFINITIONS OF TERMS USED IN THE SAFETY PLAN

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

- **Accident** means an event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of rail transit vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
- **Accountable Executive** (typically the highest executive in the agency) means a single, identifiable person who has ultimate responsibility and accountability for the implementation and maintenance of the Safety Management System of a public transportation agency; responsibility for carrying out the agency's TAM Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
- **Agency or Transit Agency** means the Luzerne County Transportation Authority or "the Authority".
- **Board** means governing body of the Luzerne County Transportation Authority or "the Authority".
- **Chief Safety Officer (CSO)** means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's CEO, general manager, president or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capabilities, unless the CSO is employed by a transit agency that is a small public transportation provider as defined by this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.
- **Consequence** means the potential outcome of a hazard.
- **Continuous Improvement** means a process by which a transit agency examines safety performance to identify safety deficiencies and carry out a plan to address the identified safety deficiencies.
- **Corrective Action Plan (CAP)** means a plan developed by a transit agency that describes the actions the transit agency will take to minimize, mitigate, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency (SSOA) or the FTA may require a Rail Transit Agency (RTA) to develop and carry out a corrective action plan.
- **Equivalent Authority** means an entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.
- **Event** means an accident, incident, or occurrence.
- **FTA** means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

- **Hazard** means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; damage to the environment; or reduction of ability to perform a prescribed function.
- **Hazard Analysis** means the formal activities to analyze potential consequences of hazards during operations related to provision of service.
- **Human Factors** refers to applied technology comprising principles that apply to equipment design, certification, training, operations and maintenance, which seek safe interface between the human and other system components by proper consideration to human performance.
- **Hazard Identification** means formal activities to analyze potential consequences of hazards during operations related to provision of service.
- **Human Performance** means human capabilities and limitations that have an impact on the effectiveness and efficiency of operations related to provision of service.
- **Incident** means an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
- **Investigation** means the process of determining the causal and contributing factors of an accident, incident or hazard, for the purpose of preventing recurrence and mitigating risk.
- **Lagging Indicators** provide evidence, through monitoring, that intended safety management outcomes have failed or have not been achieved.
- **Leading Indicators** provide evidence, through monitoring, that key safety management actions are undertaken as planned.
- **Major Mechanical Failures** are failures caused by vehicle malfunctions or subpar vehicle condition which requires that it be pulled from service. Major mechanical system failures are failures of some mechanical element of the revenue vehicle not caused by a collision, natural disaster, or vandalism and a vehicle from completing or starting a scheduled revenue trip because actual movement is limited or because of safety concerns.
- **Mechanical Failures (other)** are failures of some other mechanical element of the revenue vehicle not caused by a collision, natural disaster, or vandalism, but, because of local agency policy, prevents the revenue vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip even though the vehicle is physically able to continue in revenue service. Common examples include breakdowns of Fareboxes; Wheelchair lifts; or Heating, ventilation, and air conditioning (HVAC) systems
- **Management of Change** means a process for identifying and assessing changes that may introduce new hazards or impacts the transit agency's safety performance. If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process.

- **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
- **Near Miss** means a safety event where conditions with potential to generate an accident, incident or occurrence existed, but where an accident, incident or occurrence did not occur because the conditions were contained by chance, or by existing safety risk mitigations.
- **Occurrence** means an event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
- **Operator** of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.
- **Operational System Description** means the analysis of operations to gain an understanding of critical operational interactions to identify hazards, or those that have been identified, as well as to identify the mitigations in place to safeguard against the consequences of hazards.
- **Organizational Accident** means an accident that has multiple causes involving many people operating at different levels of the respective agency.
- **Part 673** means 49 CFR (Code of Federal Regulations) Part 673.
- **Practical Drift** means the slow and inconspicuous, yet steady, uncoupling between written procedures and actual practices during provision of services.
- **Passenger** means a person other than an operator who is on board, boarding, or alighting from a vehicle on a public transportation system for the purpose of travel.
- **PennDOT** means the Pennsylvania Department of Transportation.
- **Performance Measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
- **Performance Criteria** means categories of measures indicating the level of safe performance within a transit agency.
- **Performance Target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
- **Public Transportation Agency Safety Plan (or Agency Safety Plan)** means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
- **Public Transportation System** means the entirety of a transit provider's operations, including the services provided through contractors.
- **PUC** means Pennsylvania Public Utility Commission.
- **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.

- **Risk Mitigation** means a method or methods to eliminate or reduce the effects of hazards.
- **Safety** means the state in which the potential harm to persons or property damage during operations related to provision of services is reduced to and maintained at an acceptable level through continuous hazard identification and safety risk management activities.
- **Safety Assurance** means the process within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Deficiency** means a condition that is a source of hazards and/or allows the perpetuation of hazards in time.
- **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
- **Safety Management Policy Statement** is a document, signed by the Accountable Executive and distributed throughout a transit agency property that formalizes executive leadership's commitment to support SMS with both short-term and long-term initiatives.
- **Safety Management System (SMS)** means the formal, top-down, data-driven, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
- **Safety Objective** means a high-level, global, generic and non-quantifiable statement regarding conceptual safety achievements to be accomplished by an organizational regarding its safety performance.
- **Safety performance** means an organization's safety effectiveness and efficiency, as defined by safety performance indicators and targets, measured against the organization's safety objectives.
- **Safety performance indicator** refers to a data-driven, quantifiable parameter used for monitoring and assessing safety performance.
- **Safety Performance Measure** is an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
- **Safety Performance Measurement** means the assessment of non-consequential safety-related events and activities that provide ongoing assurance that safety risk mitigations work as intended.
- **Safety Performance Monitoring** means activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.

- **Safety Performance Target (SPT)** means a quantifiable level of performance or condition, expressed as a value for a given performance measure, achieved over a specified timeframe related to safety management activities.
- **Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
- **Safety Performance Monitoring and Measurement** means activities a transit agency must establish to:
 1. Monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
 2. Monitor its operations to identify hazards not identified through the Safety Risk Management process;
 3. Monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
 4. Investigate safety events to identify causal factors; and
 5. Monitor information reported through any internal reporting programs.
- **Safety Reporting Program** means a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.
- **Safety Risk** means the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome.
- **Safety Risk Assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
- **Safety Risk Evaluation** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value to its safety risks.
- **Safety Risk Management (SRM)** means a process within a Rail Transit Agency's Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risk.
- **Safety Risk Mitigation** means the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards.
- **Safety Risk Probability** means the likelihood that a consequence might occur, taking as reference the worst foreseeable—but credible—condition.
- **Safety Risk Severity** means the anticipated effects of a consequence, should it materialize, taking as reference the worst foreseeable—but credible—condition.

- **Serious Injury** means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within seven days from the date of the injury was received; (2) results in a fracture of any bone (except simple fractures of fingers, toes, or nose); (3) causes severe hemorrhages, nerve, muscle, or tendon damage; (4) involves any internal organ; or (5) involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.
- **State of Good Repair** means the condition in which a capital asset is able to operate at a full level of performance.
- **Transit Agency** means an operator of a public transportation system, and/or “the LCTA” or “the Authority”.
- **Transit Asset Management Plan (TAMP)** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR Part 625.
- **Vehicle Revenue Miles (VRM)** Means the miles that vehicles are scheduled to or actually travel while in revenue service. Vehicle revenue miles includes: Layover / recovery time. However, it excludes: Deadhead; Operator training; Vehicle maintenance testing; and School bus and charter services.

SECTION 10: COMMONLY USED ACRONYMS

Acronym	Word or Phrase
LCTA	Luzerne County Transportation Authority or “the Authority”
ASP	Agency Safety Plan
AE	Accountable Executive
PTASP	Public Transportation Agency Safety Plan
CFR	Code of Federal Regulations
CDL	Commercial Driver’s License
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
PennDOT	Pennsylvania Department of Transportation
PV	Private Vehicle
MPO	Metropolitan Planning Organization

MTBE	Mean Time Between Events
NSP	National Public Transportation Agency Safety Plan
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
SRM	Safety Risk Management
SA	Safety Assurance
SMP	Safety Management Policy
SOP	Standard Operating Procedure
SP	Safety Promotions
SPI	Safety Performance Indicator
SPT	Safety Performance Target
STIP	Statewide Transportation Improvement Program
TSO	Office of Transit Safety and Oversight
TSI	Transportation Safety Institute (DOT)
U.S.C.	United States Code
VRM	Vehicle Revenue Miles
NTD	National Transit Database
TAM	Transit Asset Management Plan
CSO	Chief Safety Officer
DOT	U.S. Department of Transportation
PUC	Pennsylvania Public Utility Commission
FMCSA	Federal Motor Carrier Safety Administration
PPTA	Pennsylvania Public Transportation Association
SGR	State of Good Repair



2020 LCTA PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

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