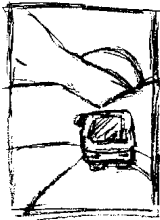


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RTAP: A Rural Transit Assistance Program of the Federal Transit Administration

MANAGING SYSTEM SAFETY FOR RURAL TRANSIT



Providing passengers and employees with the highest possible level of safety is a fundamental goal of every rural transit system. So why is it that safety does not always receive the attention it deserves? Small systems tend to have few management positions, and a single manager is left juggling multiple responsibilities. As a result, safety issues may be relegated to second-

ary status, receiving attention only when the system sustains a loss. This reactive approach can be costly to a small system. Safety should be a proactive process and an integral part of a rural transit system's daily operations. In short, safety is everyone's responsibility.

Providing the highest level of safety in an efficient manner requires the development and implementation of a comprehensive system safety program (SSP). This program should address the three primary safety functions of a transit system:

- To prevent the occurrence of incidents and accidents;
- To respond to incidents and accidents appropriately and recover from any loss as quickly as possible; and
- To learn from incidents and accidents.

This brief outlines how to develop and implement an SSP for rural transit agencies.

SAFETY IS AFFORDABLE

Transit system costs associated with liability claims; property and equipment damage; the replacement of service, equipment and employees; and the administration of risk management can eat up scarce funds. Instead, these same dollars could be used for a system safety program that results in the provision of safer and more efficient transportation.

A management position responsible for the safety of the system, employees, and passengers provides a significant long-term cost-saving measure for rural transit systems. A safety manager has the necessary time to direct the development and implementation of a proactive safety management program.

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(If a full-time safety specialist is not feasible for your system, the responsibility for an SSP should be assigned to a respected employee who communicates easily with diverse staff and interests.) The net improvement to the system can be seen in such areas as more favorable insurance rates, reduction in employee injury, less vehicle down-time due to incidents and accidents, more efficient and cost-effective service, and an enhanced public image.

SAFETY REQUIRES COMMITMENT

Preventing incidents and accidents and reducing loss is the responsibility of all transit system personnel. A successful SSP requires the commitment of the system's top management, including the Board of Directors. To guarantee that the SSP has the commitment of all system personnel, each department and job function must participate in its preparation and implementation. Individual ownership of, and responsibility for, the safety of the transit system is crucial to a proactive plan. The principle is simple: safety is everyone's responsibility.

COMPONENTS OF AN SSP

Each transit system should create its own specific SSP. The SSP identifies the safety issues that must be considered by the transit system, as well as the relationship and responsibilities of the transit system with other departments, agencies, and organizations that impact safety. The introduction to the program should convey the safety commitment and position of that transit system in a clear and concise manner. It should address the following issues and contain the following information:

1. Purpose of the SSP

The SSP formally documents the transit system's commitment to safety. The SSP also provides a framework for the implementation of safety policy and achievement of safety goals and objectives. It guides the transit system in meeting the requirements of federal and state laws and local codes, ordinances, and regulations.

2. Policy Statement

The policy statement of the System Manager (or Agency Director, if the transit system is part of a larger organization) is important because it establishes the transit system's commitment to the SSP on an agency-wide basis. It addresses all departments and job functions within the transit system, including passengers and employees.

3. System Description

This section of the SSP should define the transit system in terms of the people, procedures, equipment, facilities, and environment in which the system operates. It describes the entire transit system operation, including the details listed below, and identifies which staff members perform which specific functions related to the provision of service.

The system description should include at least the following:

- Population(s) the system aims to serve
- Types of service offered
- Number of rides provided per year
- Number of square miles covered
- Hours and days of service
- Number of employees
- Number and type of vehicles
- Description of the system's facility
- Geographic characteristics of the service area.

It should also provide a list of regulations that affect the system, which may include:

- Americans with Disabilities Act
- Clean Air Act
- Driver and vehicle licensing
- Drug and alcohol testing
- Handling bloodborne pathogens
- OSHA requirements, such as Employee Right-to-Know
- Underground fuel storage
- Vehicle safety and inspection

ROLES AND RESPONSIBILITIES FOR IDENTIFYING SAFETY ISSUES

Safety is the responsibility of all transit system employees, and everyone should be able to identify safety issues. This philosophy should be clearly stated in this section of the SSP. If employees understand they are responsible for identifying safety issues, they are more likely to act to prevent incidents and accidents. To obtain the most effective results, each job function within the transit system should contribute to the preparation of this section. Such an approach helps ensure that safety responsibility will be clearly stated and understood by all transit system personnel. It also allows for performance evaluation based on incident and accident prevention and creation of a safe transit environment.

It is important to view systems of all sizes in terms of which person performs which function. For example, who determines the types of vehicles to be purchased and when? Who designs the service delivery methods? Who establishes and

enforces policies and procedures? The following job functions are performed in some manner in all transit systems, regardless of size. At a minimum, the SSP should clearly identify:

- **Human Resources:** medical issues (drugs and alcohol); legal counsel; labor relations; personnel (hiring, evaluation, firing); operations; safety and training (including OSHA regulations and blood-borne pathogens); and workers' compensation
- **Operations:** scheduling, dispatching, service delivery, maintenance and warranty recovery.
- **Planning:** facility development, equipment requirements, service changes and marketing
- **Administration:** budget development, financial systems, information systems policy, customer relations, external and internal communication systems, and Board and advisory committee relations
- **Auditing:** financial and service performance

Next, this section should include job descriptions for all job categories. The job descriptions should relate to the job functions described above. Each function has an impact on the safety of the system. Ignoring these functions or failing to identify the safety responsibilities within each function can reduce the level of safety of the transit system and undermine attempts to address safety issues proactively.

THE HAZARD IDENTIFICATION PROCESS

After safety responsibilities have been identified and assigned to all transit system personnel, the next step is to identify, assess, and resolve safety issues and hazards. These may include a variety of items, ranging from alternative fuels to icy roads to vehicle breakdown on the road. This section of the SSP should present a clear and concise description of the identification process. For most transit systems, this process will contain a description of how to:

- Identify the safety issues,
- Assess the safety issues,
- Resolve the safety issues,
- Implement corrective and preventive actions, and
- Follow-up and monitor.

MANAGING THE SSP

With the safety responsibilities of each job function and the personnel within the agency clearly stated, and with a process in place for the identification, assessment, and resolution of safety issues and hazards, management of the SSP must be continual.

Initially, the person designated to manage the system's safety must have the authority to establish, manage, monitor, and follow up safety goals. The system safety manager's role includes:

- Coordinating and interfacing with the departments and job function areas through:
 - establishing a safety committee and identifying its responsibilities,
 - coordinating with the persons responsible for safety management of contractors and vendors,
 - identifying and developing required internal and external safety reporting systems,
 - conducting incident and accident investigations,
 - establishing a committee to review incidents and accidents, disseminate results of investigations and notify the appropriate personnel to prevent a reoccurrence, and
 - providing follow-up monitoring and evaluation of corrective actions.
- Reviewing and revising safety policies and procedures.
- Reviewing vehicle specifications prior to bid awards.
- Reviewing and auditing operations; collecting and reviewing operating data.
- Establishing a safety training program by:
 - instituting safety training requirements,
 - conducting and evaluating safety training classes, and
 - scheduling and leading regular safety meetings.

SSP IMPLEMENTATION

Once the SSP has been written, develop a detailed timetable for its implementation. Information about when, how, and how often the initial and revised parts of the SSP will be disseminated to all transit system departments and employees should be included. Establish timetables for resolution of identified safety issues and hazards. A viable SSP changes as the transit system's people, procedures, equipment, facilities and operating environment change. The SSP must constantly be reviewed and revised to reflect these changes.

SSP MAINTENANCE

Maintenance of the SSP involves a variety of ongoing activities, most of which are proactive. These include:

- Establishing the process of internal audits to ensure that safety issues are identified, reported and resolved, and corrective actions taken. One method is to establish a management review and audit process. At a minimum, an annual safety au-

dit should be conducted by a preselected committee of three or four persons.

- Reviewing data on the process of hazard identification and resolution on a regular basis, such as quarterly, to ensure that hazards are dealt with in a timely fashion.
- Reviewing incident and accident data on a case-by-case basis and over a period of time to identify trends, and formulating recommendations to prevent recurrences.
- Establishing a schedule for revising and updating the SSP.
- Establishing a process for using outside safety experts to perform reviews and evaluate the SSP and the overall safety of the transit system. Such experts may be available locally. For example, your insurance carrier or state highway patrol office may offer safety reviews at little or no cost. Peers, such as managers or safety coordinators of other rural transit systems, can also serve as reviewers.

JUSTIFYING A SAFETY POSITION

Particularly within smaller transit systems, it may be difficult to justify assigning a staff member to be in charge of safety. Since safety really is everyone's business, it may seem that no one individual needs to take time from a busy day for the purpose of overseeing safety, but accountability demands that someone have oversight responsibility. The following five major responsibilities of a safety manager demonstrate the need to create at least a part-time safety position within your organization.

- Liaison to insurance carrier: Insurance companies need safety-history information and reports when figuring insurance premiums for transit companies, and they prefer to have one person as the contact point. With accurate records of losses and claims record-keeping can be accelerated and a reduced premium may result. Having a safety officer and ongoing safety training can help cover the cost of an insurance policy.
- Incident and accident investigator: Incident and accident investigation by a safety officer who knows what to look for can minimize claims against a transit system. The driver cannot always explain the event accurately and investigation is often necessary. If claims are not handled professionally they can turn into costly lawsuits.
- Compliance administrator: Various federal, state, and local regulations require the attention of a safety officer. The FTA's drug and alcohol testing program and OSHA's rules on handling bloodborne pathogens and underground fuel storage are examples. Safety regulations related to the operation of vehicles require a safety officer to work closely with maintenance personnel to assure compliance.
- Driver trainer: A safety officer should screen driver applicants on road tests and safety tests. If drivers take tests on a

regular basis the safety officer needs to monitor the results. Drivers need safety training in defensive driving, passenger accessibility and emergency situations.

- Worker's compensation officer: When there is a worker's compensation claim filed by an employee, the safety officer must investigate the situation and provide information to insurance companies.

DOCUMENT ALL TRAINING

Providing sufficient safety training for your personnel is crucial. Documenting its provision is necessary. There are three primary reasons for this documentation:

- If an incident or accident does occur, safety training records indicating that the personnel involved had the proper safety training and therefore acted in the proper manner can save your agency from embarrassment (and possible litigation).
- If it should be proven that one of your employees did perform in an irresponsible and dangerous manner, that employee will be unable to maintain that she or he was not properly trained and therefore was unprepared for the situation that occurred.
- You will be able to easily ascertain the safety competence of your personnel by referring to your training records.

Documenting the training you have provided is very simple. Every time that your agency conducts a training program, keep the following records:

- The date(s) that the training was conducted;
- The name of the trainer;
- The type of training program that was conducted;
- The location of the training;
- The categories of employees who were to receive this particular type of training;
- The names, titles and affiliations (whether any attendees were from other agencies or organizations) of all participants in the training;
- A list of all those who completed the training satisfactorily, and have the trainees sign the list; and
- A list of any certificates or awards that were presented at the completion of the training, including the recipients of such certificates or awards.

The effort of recording this information is minor compared to the value it will provide should an incident or accident occur.

Remember, the principle is simple:

Safety is EVERYONE'S responsibility.

The original Technical Brief was written by Judith Byman; it was revised by the RTAP National Review Board, APWA staff, and CTAA staff in 2000.

RESOURCES

The National Transit Resource Center maintains a peer-to-peer technical assistance network, tapping into a wealth of experience from professionals in the community transportation field. For more information, visit the CTAA website at www.ctaa.org/ntrc/services, or contact the National Transit Resource Center at 800.527.8279.

Byman, Judith and William Hathaway, *Bus and Passenger Accident Prevention* USDOT, 1994. (Order on-line at <http://www.ntis.gov/search.htm>.)

The North Carolina Passenger, Vehicle and Public Transportation System Safety Plan Guide North Carolina Department of Transportation, 2000. (Request a copy from the NTRC at 800.527.8279.)

Recommended Emergency Preparedness Guidelines for Urban, Rural, and Specialized Transit Systems USDOT, 1991. (Order on-line at <http://www.ntis.gov/search.htm>.)

Risk Management for Rural Transit Systems (training module), Rural Transit Assistance Program, Revised 2000. (Order from the NTRC at 800.527.8279.)

Walther, Erskine. *Bloodborne Pathogens: A Guide for Managers*, Technical Assistance Brief No. 3, December 1995. (Find this brief on the CTAA website at <http://www.ctaa.org/ntrc/ctap/pubs/blood.shtml>.)

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