
Milwaukee County Transit System

Agency Safety Plan



The Federal Transit Administration (FTA) has adopted the principles and methods of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation in the United States. FTA will follow the principles and methods of SMS in its development of rules, regulations, policies, guidance, best practices, and technical assistance administered under the authority of 49 U.S.C. 5329. This part sets standards for the MCTS Agency Safety Plan (ASP), which will be responsive to FTA's Public Transportation Safety Program, and reflect the specific safety objectives, standards, and priorities of MCTS. The Milwaukee County Transit System ASP will incorporate SMS principles and methods tailored to the size, complexity, and scope of the public transportation system and the environment in which it operates.

Table of Contents

- 1. TRANSIT AGENCY INFORMATION.....3
- MISSION, VISION, & VALUES OF THE MILWAUKEE COUNTY TRANSIT SYSTEM3
- 2. PLAN DEVELOPMENT, APPROVAL, AND UPDATES4
- 3. SAFETY PERFORMANCE TARGETS.....5
- 4. SAFETY MANAGEMENT POLICY6
- 5. SAFETY RISK MANAGEMENT12
 - SAFETY RISK MANAGEMENT PROCESS.....12
 - 5.1 SAFETY HAZARD IDENTIFICATION.....12
 - 5.2 SAFETY RISK MITIGATION23
 - 5.3 SAFETY RISK REDUCTION PROGRAM23
 - 5.4 INFECTIOUS DISEASES.....24
- 6. SAFETY ASSURANCE25
 - 6.1 SAFETY PERFORMANCE MONITORING AND MEASUREMENT.....25
 - 6.2 MANAGEMENT OF CHANGE27
 - 6.3 CONTINUOUS IMPROVEMENT28
 - 6.4 COMPETENCIES AND TRAINING28
 - 6.5 SAFETY COMMUNICATION33
- 7. ADDITIONAL DOCUMENTS REFERENCED IN THIS PLAN34
- 8. DEFINITIONS OF SPECIAL TERMS USED IN THE SAFETY PLAN34
- 9. LIST OF ACRONYMS USED IN THE SAFETY PLAN37

1. Transit Agency Information

Transit Agency Name	Milwaukee County Transit System		
Transit Agency Address	1942 N. 17 th St. Milwaukee, WI 53205		
Name and Title of Accountable Executive	Denise Wandke, President & Managing Director		
Name of Chief Safety Officer or SMS Executive	Dan Basile, Chief Operations Officer		
Mode(s) of Service Covered by This Plan	Fixed Route Bus and Demand response	List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5310
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route – Directly Operated Demand Response – Contracted Service		
Does the agency provide transit services on behalf of another transit agency or entity?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Description of Arrangement(s)

Mission, Vision, & Values of the Milwaukee County Transit System

Mission

MCTS Connects our community to jobs, education, and life with essential transit services

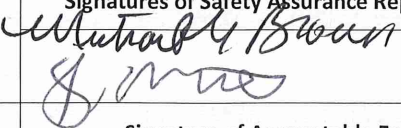
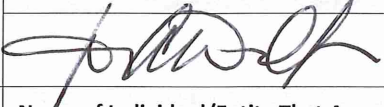
Vision

To be the preferred transportation choice through service excellence and innovation

Values

Respect
Integrity
Excellence
Equity
Collaboration
Innovation

2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Milwaukee County Transit System		
Signature by the Safety Assurance	Signatures of Safety Assurance Representatives	Date of Signature	
		3/1/24 3/1/24	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature	
		3/1/24	
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval	
	Milwaukee County Board of Supervisors		
	Relevant Documentation (title and location)		
	MCTS Agency Safety Plan – MCTS Sharepoint Site		
	Name of Entity That Certified the Transit Awaed Management System (TrAMS) and date		
	Milwaukee County Department of Transportation – February 6 th , 2023		
Version Number and Updates			
<i>Record the complete history of successive versions of this plan.</i>			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
2020 – 1	All	New Plan –	08-01-2020
2020-2	Section 4.4/ 9	Updated SAC members	09-14-2020
2020-3	Table of Contents	Changed numbering of Risk Mgt to be consistent	10-01-2020
2020 – 4	Page 1	Added Signature	11/6/2020
2022-05	All	Updates based on FTA Review / Updated Safety Performance Targets	7-1-2022
2023-06	All	Updates based on FTA Review / Updated Safety Performance Targets	12/21/2023
2024-07	4, 9, 10, 12, 22, 26	Safety Assurance Committee Amendments	

Annual Review and Update of the Public Transportation Agency Safety Plan

The Chief Safety Officer, the Transportation Training Manager, the Maintenance Manager of Administration and the Director of Safety, Security & Project Management will meet and jointly review the ASP by December 1st of each year. If any changes are made, the Chief Safety Officer will present the changes to the Safety Assurance Committee for approval prior to January 1st. Once the Safety Assurance Committee approves the updates the Accountable Executive and the Milwaukee County Director of the Department of Transportation will be forwarded a copy for review. Once approved, the new version of the plan will be signed and presented to the County Board for approval by February 1st. Once approved, the updated plan will then be disseminated to the appropriate MCTS staff, training on changed content will be conducted, and old versions will be archived on the shared ASP site in Microsoft Teams.

3. Safety Performance Targets

The Public Transportation Agency Safety Plan (PTASP) regulation requires MCTS to establish safety performance targets (SPTs) to address the safety performance measures (SPMs) identified in the National Public Transportation Safety Plan.

As described in the National Safety Plan, MCTS must establish seven (7) Safety performance targets for both fixed route and demand response (Paratransit) services. These targets are:

1. Total number of fatalities reported to the National Transit Database (NTD)
2. Fatality rate per total vehicle revenue miles (VRM)
3. Total number of injuries reported to NTD
4. Injury rate per total VRM
5. Total number of safety events reported to NTD
6. Safety Event rate per total VRM
7. System Reliability, which is the mean distance between major mechanical failures

Milwaukee County Transit System Safety Performance Targets

2024

Mode of Transit Service	Fatalities	Fatalities (Per 1M VRM)	Injuries	Injuries (Per 1M VRM)	Safety Events	Safety Event Rate (Per 1M VRM)	System Reliability
Fixed Route Total	0	0	85	5.26/1M VRM	96	5.94/1M VRM	3085 Miles
DR Total	0	0	26	12.04/1M VRM	28	12.97/1M VRM	126922 Miles

MCTS Annual Fixed Route Vehicle Revenue miles are expected to be 16,151,907 in 2024

Fixed Route targets represent a 5% reduction based on average data from 2020-2022

Demand Response targets represent a 5% reduction based on average data from 2020-2022

Safety Performance Target Coordination

The following is MCTS’s coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.

As identified in the Public Transportation Agency Safety Plan (PTASP) regulation (49 C.F.R. Part 673), the Southeastern Wisconsin Regional Planning Commission (SEWRPC), as the Metropolitan Planning Organization (MPO) for the seven-county southeastern Wisconsin area, will integrate transit agency performance targets and performance plans into VISION 2050, the regional land use and transportation system plan for Southeastern Wisconsin and the regional Transportation Improvement Program (TIP). The Commission will include a description in the TIP of how the programmed projects promote the achievement of the highway and transit performance targets, including the established regional transit safety performance targets.

Consistent with the Cooperative Agreement for Continuing Transportation Planning for the Southeastern Wisconsin Region, entered into on January 21, 2020, and the Performance Measure Cooperation Written Documentation, finalized on April 26, 2018, the Commission will cooperatively establish performance targets, share data, and prepare system performance reports in coordination with the Wisconsin Department of Transportation (WisDOT) and transit operators.

As part of this cooperative process, transit operators will share transit safety performance data and targets with SEWRPC to assist with the development of initial regional safety performance targets for consideration by transit operators in the Region. SEWRPC will coordinate with transit operators on the development of the regional transit safety performance targets for inclusion in subsequent updates of VISION 2050 and the TIP.

Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Wisconsin Department of Transportation	October 3 rd , 2023
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Southeastern Wisconsin Regional Planning Commission	October 3 rd , 2023

4. Safety Management Policy

4.1 Safety Management Policy Statement

Purpose:

To ensure transit safety and comply with Federal Transit Administration (FTA) requirements, MCTS has developed and adopted this Safety Management Policy that strengthens our commitment to maintain an active Safety Management System (SMS), that encourages the open sharing of information on all safety issues throughout MCTS.

Responsibilities and Accountabilities:

MCTS’s executive team and management staff are committed to SMS as a systematic and comprehensive approach to identifying safety hazards and risks associated with transit system operations and related maintenance activities. Through a top-down approach, MCTS will foster agency-wide support for transit safety by establishing a culture in which everyone in the organization takes an active role to ensure that management has access to the information necessary to strategically deploy resources based on identified safety concerns, establish and support accountability for safety decision-making and address unacceptable safety risk.

Safety Objectives

1. Safety is a Mission Critical Directive (MCD) for MCTS by continuously examining our operations for hazards, through active employee reporting and review and analysis of data.
2. By focusing on safety, the services that we provide will be Reliable; another MCD. We will provide consistently high-quality transit services by clearly explaining for all staff their accountabilities and responsibilities for the development and operation of MCTS's SMS. MCTS will focus on reducing preventable accidents and incidents and commit to supporting an accident review committee to focus on contributing factors to all accidents at MCTS, whether in a garage, on other property or on a bus.

Safety Culture

MCTS believes in explicitly promoting safety MCTS Executive Management is dedicated to explicitly promoting safety and establishing a culture that recognizes safety as a core value, trains employees in safety principles, and allows open, two-way communications of safety issues. It involves establishing a culture that recognizes safety as a core value, training employees in safety principles, and allowing open communications of safety issues.

Actions, attitudes, and decisions at the policy-making level will demonstrate a genuine commitment to safety. Safety is a responsibility of every employee, but the ultimate responsibility for safety rests with the Managing Director of MCTS. Employees should trust that they have management support for decisions made in the interest of safety while recognizing that intentional breaches of safety will not be tolerated.

4.2 Safety Management Policy Communication

The Safety Management policy will be integrated into each employee handbook and posted annually on all company Safety bulletin boards at each location. The MCTS Safety Assurance Committee (SAC) meets monthly (or as needed) and will provide updates to accountable executives on safety issues, safety priorities and hazards. The MCTS SAC will also meet on a regular basis with each work location so any concerns or progress can be discussed. In addition, MCTS is committed to ensure contracted paratransit providers will post and share their corporate Safety Management Policy with their employee.

4.3 Employee Safety Reporting Program

MCTS is committed to the safest transit operating standards possible. Employees have uninhibited ability and are encouraged to report incidents and occurrences which may compromise safety of operations. To this end, every employee and contract service provider is responsible for the communication of information that may affect safety of the transit system. Safety reporting is completely free of any form of reprisal. Employees are encouraged to provide contact information so that follow-up information may be obtained if needed. However, all employees may report safety hazards to their supervisor anonymously through the online MCTS Safety Reporting System or by emailing safety@mcts.org.

Transportation Department Employees can report safety concerns to the company by the following methods:

- In person or by phone to their Supervisor, Training Supervisor or Division Manager
- By two-way radio transmission to the Dispatch Office
- In person to a Route Supervisor
- By contacting Union representative
- Completion of a Vehicle Defect Card
- Completion of report via online MCTS Safety Hazard Reporting System

Maintenance Department Employees can report safety concerns to the company by the following methods:

- In person or by phone to Shop Forman, Shift Supervisor or Garage Manager
- By Phone to the Dispatch Office
- By contacting Union representative
- Completion of a Safety Condition Report
- Completion of report via online MCTS Safety Hazard Reporting System

Employee behaviors that would result in disciplinary action:

- Reporting to work under the influence of alcohol or drugs
- Operating company vehicle while using cellular phone, including texting and hands-free use
- Horseplay
- Disarming safety device
- Failure to wear proper Personal Protective Equipment
- Failure to report a known safety hazard or defect
- Unsafe or illegal vehicle operation, traffic violations
- Not following safety rules or procedures.

For their Safety, employees may be temporarily removed from service by a supervisor any time they are deemed unsafe for any reason including medical conditions such as dizziness, vision impairment, chest pains or drowsiness.

Paratransit:

Contracted providers follow their respective Agency Safety Plans for employee safety hazard reporting and the results of their reporting system, and the risk management process will be communicated monthly through the MCTS Contract Compliance Audit Supervisor.

4.4 Authorities, Accountabilities, and Responsibilities

Management has the overall responsibility of safe and secure operations of MCTS and contract service operators. Each employee is required to carry out specific system safety responsibilities, depending on

his/her position, in compliance with the PTASP. The information provided below describes each position and the reporting structure; the table in the following page shows system safety responsibilities of each position specifically.

Denise Wandke, President and Managing Director

The Accountable Executive meets all the requirements in [§673.5](#) and [§673.23\(d\)\(1\)](#). This position is ultimately responsible for:

Accountable Executive

- Carrying out the Agency Safety Plan (ASP) and the Transit Asset Management (TAM) Plan,
- Controlling or directing the human and capital resources needed to develop and maintain the ASP and the TAM Plan, and
- Ensuring that the agency’s SMS is effectively implemented, and action is taken, as necessary, to address substandard performance in the agency’s SMS.
- Communicating the Agency Safety Plan to Milwaukee County Executive, the Board of Supervisors, and the Department of Transportation.
- Overseeing the transit agency’s safety certification.
- Approving the Agency Safety Plan and any updates

Dan Basile, Chief Operations Officer / Chief Safety Officer

Reports directly to the Accountable Executive and oversees and directs:

Chief Safety Officer or SMS Executive

- SMS processes and activities.
- Hazard management practices in all MCTS Operations
- Safety Assurance Committees operations and handling of incident and accident investigations but will not make decisions for the committee or restrict the activity of the committee.
- MCTS’ internal safety audit programs.

Sandra Kellner, Chief Administrative Officer

Ensures

Agency Leadership and Executive Management

- SMS is communicated and supported throughout MCTS.
- Procurement of technical and material resources for SMS implementation.
- Agency-wide safety policy and procedure implementation and support.

SMS Project Managers and Subject Matter Experts

- Brittany M. Bertsch, Director of Safety, Security & Project Management**
- Frederic Spence, Interim Training Manager**
- Sawyer Schmitt, Safety & Security Manager**
- Joe Price, Manager of Maintenance Administration**
- Chris Fox, Paratransit Compliance Audit Manager**
- Kevin Pumphrey, Director of Transportation**
- Dwayne Reese, Director of Maintenance**
- Frances Musci, Director of Paratransit**
- Ben Stark, Human Resources Director**

- Assists with the updating and maintenance of the Agency Safety Plan.

**Safety Assurance
Committee Members**

Sawyer Schmitt, Safety & Security Manager
Melanie Flynn, Street Operations Manager
Joe Price, Maintenance Administration Manager
David Locher, Manager of Enhanced Transit
Chris Fox, Paratransit Compliance Audit Manager
Nilsa Rosado-Jurkiewicz, Director of Risk Management
Brittany Bertsch, Director of Safety, Security and Project Management
(Alternate)

Five front line workers (ATU 998)

One front line worker (Local 9)

One alternate front line worker (ATU 998)

The Safety Assurance Committee's responsibilities include:

- Approving the Agency Safety Plan and subsequent updates including safety performance targets.
- Identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment process.
- Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended.
- Identifying safety deficiencies for purposes of continuous improvement.

Brian Kading, General Manager

This position oversees the operations of Transdev and has a direct line of reporting, without intermediaries, to the MCTS Accountable Executive. This position is ultimately responsible for:

**Transdev (Contracted
Service)**

- Assisting with carrying out the Agency Safety Plan (ASP)
- Controlling or directing the human and capital resources needed to uphold and maintain the ASP.
- Ensuring that the agency's SMS is effectively implemented, and action is taken, as necessary, to address substandard performance in the agency's SMS.

Transdev Safety Manager

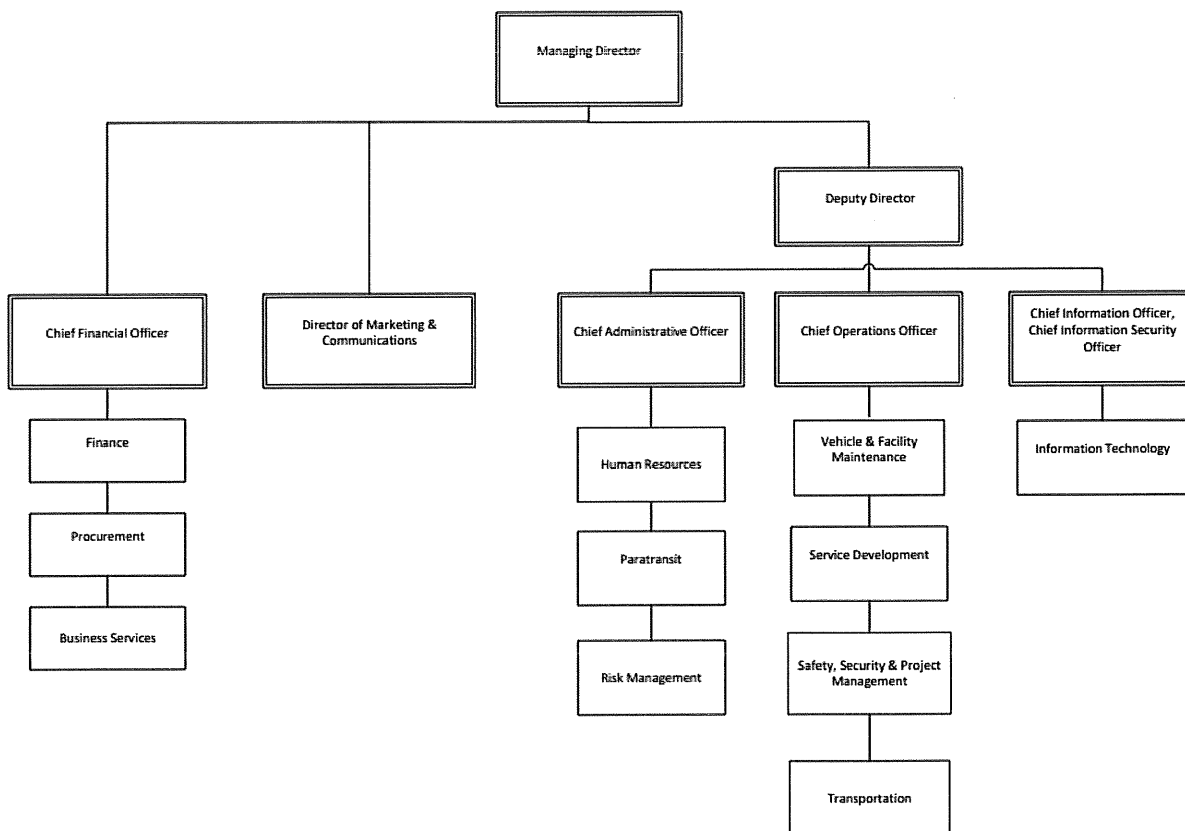
This position oversees the safety of Transdev and has a direct line of reporting, without intermediaries, to the MCTS Accountable Executive. This position is ultimately responsible for:

**Transdev (Contracted
Service)**

- Assisting with carrying out the Agency Safety Plan (ASP)
- Resolving safety hazards and mitigating future hazards

Milwaukee County Transit System

Operated by Milwaukee Transport Services, Inc
10/30/2023



5. Safety Risk Management

Safety Risk Management Process

Milwaukee County Transit System takes a proactive approach to managing safety. All employees are required to perform their jobs in the safest manner possible. There are many inspection measures in place across all departments to ensure proper management and maintenance of equipment and processes. Through our Transit Asset Management Plan, Vehicle Fixed Asset Assessments, pre-trip inspections and audits of paratransit contract management, along with the Risk Assessment Matrix, we can properly allocate resources. The steps followed in managing hazards is outlined in the following diagram.



5.1 Safety Hazard Identification

Safety hazard identification is critical in our efforts to provide the safest and most reliable service. All safety hazards identified and reported to management will be tracked through the Risk Register that is managed by the Safety Assurance Committee. There is a representative from Maintenance, Transportation, and Safety, Security & Project Management who will be responsible for entering hazards into the risk register when they are received, and then the Safety Assurance committee will assess the mitigation efforts to see if the appropriate actions were taken and that there were no negative effects of the mitigation.

FTA and Oversight Reporting Sources:

MCTS relies on Audits and reviews by the FTA, TSA, Milwaukee County Department of Transportation and other oversight authorities as a source of hazard reporting. When deficiencies are reported in after-action reports, they will be documented on the MCTS Risk Register and addressed by the department responsible for their mitigation.

Transportation Department Hazard Reporting and Processing:

- Pre-trip vehicle inspections
 - Description: Inspection by Operator before vehicle is operated to determine road worthiness.
 - Follow Up: If any defects are found, Maintenance is notified for repairs.
 - Documentation: Defect Cards are kept by the Maintenance Department.

- Trip / Run Report defect cards
 - Description: Document that Operators list bus safety and mechanical defects on. Issues on Defect card issues are minor in nature and the operator reports this to the Maintenance Clerk on pull-in so that it can be addressed by mechanics.
 - Follow Up: Maintenance department puts information from the Defect Card on the Bus Logbook so that repeated defects can be tracked over time.
 - Documentation: Defect Cards

- Maintenance Road Call
 - Description: A road call is when the operator calls dispatch for a major mechanical problem with the bus which then needs to be removed from service. “Chargeable” road calls are when there is an interruption in revenue service caused by preventable mechanical failures.
 - Follow Up: Maintenance department fixes and tracks all road calls and any repeat issue is reviewed by the garage managers. Any bus with the same problem within 30 days is noted.
 - Documentation: Maintenance Road call log

- Wellness checks for Operators by Route Supervisors
 - Description: Route Supervisors will board buses at random to interview operators to identify potential safety hazards and to monitor operator compliance with system regulations.
 - Follow Up: Any hazards identified will be reported to SAC by use of the MCTS Safety Reporting System. Any immediate concerns requiring a detour or security will be addressed on location. Violations of company policy will be documented and addressed through a company complaint being issued.
 - Documentation: Google Forms spreadsheet

- Bus Stop Committee
 - Description: Determines the locations of bus stops throughout the system and submits for approval(s) as needed.
 - Follow Up: Consults with Transportation and Paratransit Departments to ensure that each stop is safe for passengers, equipment and is ADA compliant.
 - Documentation: Bus Stop Committee Teams site

- Accelerometer videos

- Description: Videos are generated and automatically download via on-board camera system each time the bus experiences a motion not consistent with everyday driving of a transit bus. These triggers can includes hitting curbs, turning to quickly or abrupt stopping.
- Follow Up: Information from each video clip is reviewed and sent to Supervisor and Training Department for additional training as needed.
- Documentation: Apollo Camera Video System
- Post-accident training reviews to identify and correct unsafe driving behaviors.
 - Description: Training reviews occur after an Operator has an accident that is determined to be preventable.
 - Follow Up: The Training Department meets with each Operator individually to identify and correct unsafe driving behaviors and to discuss their preventable accident, offer suggestions on how to avoid a like accident in the future and a ride evaluation to review all skills.
 - Documentation: Training Review tracking form
- Public complaints
 - Description: Complaints from the public, including passengers, that are received at MCTS through either phone call, email, Facebook or RideMCTS.com website.
 - Follow Up: Customer enter information and complaint is investigated. If complaint is valid, Supervisor will interview Operator and re-instruct as needed.
 - Documentation: Safety hazards reported through the customer service process will be sent to Safety@mcts.org and will be addressed by the appropriate department and tracked through the Risk Register and the Safety Assurance Committee.
- Union complaints
 - Description: Issues that are brought up through the Union that are as a result of Operator input through Union Steward.
 - Follow Up: Complaint is investigated, and appropriate department(s) notified.
 - Documentation: Email information
- Proposed route changes or new routes
 - Description: All new routes or changes for existing routes are reviewed
 - Follow Up: The Training Department, along with members from the Schedule and Planning Department, will evaluate all new route or changes to existing route proposals. This includes driving each route with a bus to determine that it can be operated in service keeping safety in mind for passengers, bus and surrounding environment.
 - Documentation: Planning / Training files, Bus Stop Committee Teams site
- Safety or hazard concerns as reported to company management
 - Description: Safety or hazard concerns will be entered into the MCTS Safety Reporting System by the person that it was reported to or the supervisor may send an email to Safety@MCTS.org.
 - Follow Up: MCTS will use the Safety Risk Register to record, track and log hazards in the workplace.
 - Documentation: Safety Risk Register

- Safety or hazard concerns as reported online MCTS Safety Reporting System.
 - Description: Safety or hazard concerns that were entered into the MCTS Safety Reporting System.
 - Follow Up: MCTS will use the Safety Risk Register to record, track and log hazards in the workplace.
 - Documentation: Safety Risk Register

- Information provided to Dispatch
 - Description: Operators will contact Dispatch via two-way radio or telephone to report roadblocks, accidents, construction or other unsafe items observed while in service.
 - Follow Up: Dispatch will send Route Supervisors or Security to follow up on the condition of the report. If immediate action is required, such as a detour, it will be immediately implemented. All other concerns will be entered into the MCTS Safety Reporting System.
 - Documentation: Dispatch radio logs, Safety Risk Register

- Information received through department meetings and communication.
 - Description: Hazards may be identified through internal meetings. When identified, it will be entered in the MCTS Safety Reporting System.
 - Follow Up: MCTS will use the Safety Risk Register to record, track and log hazards in the workplace. A Safety Risk Register is an information management tool used to document Safety Risk Management and Safety Assurance activities.
 - Documentation: Safety Risk Register

Transit Asset Management Plan

The purpose of MCTS TAM Plan is to outline how the Milwaukee County Transit System will accurately identify and prioritize the assessment and investment in revenue and non-revenue vehicles, equipment, infrastructure, and facilities. The plan identifies processes by which we effectively address those needs and identifies the practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage performance, risks, and costs over their life cycles to provide safe, cost-effective, and reliable public transportation.

Once processes are identified, vetted, and implemented, the plan will help MCTS create a long-term strategic plan for all MCTS assets. The TAM process will move MCTS towards a long-term facilities/asset State of Good Repair (SGR) vision. The SGR shall include objective standards for measuring the condition of capital assets of recipients, including equipment, rolling stock, infrastructure, and facilities

While there are no formal requirements that link MCTS's Transit Asset Management (TAM) Plan with SMS, there are many opportunities to share information and analysis between the two processes, thus improving actions and decision-making agency wide.

TAM-SMS Nexus Points:

1. The Accountable Executive reviews and approves the TAM and Agency Safety Plans
2. Condition Assessments done in the TAM Plan can identify potential safety issues
3. TAM Data and analysis will be used for performance monitoring and measurement
4. Safety Risk Assessments will prioritize the repair or replacement of an asset in TAM

5. Outcomes of risk assessments could inform resources for TAM

Maintenance Department Hazard Reporting and Processing:

During orientation and at each monthly training, all employees are encouraged to report any hazards, unsafe acts, or equipment safety issues to any management staff member. If employees wish to remain anonymous, they could fill out a paper or online safety hazard form or report the issue to a union representative who could then bring the issue to MCTS Maintenance management.

- Monthly safety inspection checklist by Buildings & Grounds (B&G) Department Employees
 - Description: Each month, trained B&G employees conduct inspections of all equipment and property for defects and safe operation. These inspections include all Fire extinguishers and fire alarms
 - Follow up: A form is completed for each month any defects noted, and repairs made are written on the back of the form. All issues must be repaired and addressed when found. The supervisor of B&G files all inspection reports according to MCTS records retention policy.
 - Documentation: Maintenance Department Training files
- Preventative Maintenance (PM) Forms
 - Description: Twice per year, the Milwaukee County Transit System utilizes mechanical contractors to perform inspections and preventative maintenance on all critical infrastructure. It is necessary to conduct preventative maintenance on all critical facility/mechanical infrastructure not only extend the life of the equipment, but to ensure safety and reduce the chances of catastrophic failure.
 - Follow up: any defects noted, and repairs made are entered into the Cityworks Maintenance work order system and addressed promptly. If repairs are required before equipment can be operated, the employee will lock out and tag the equipment to prevent use. All OSHA guidelines are followed for Lock-out/Tag-out when the machine is put back in service to ensure the safety of the equipment.
 - Documentation: Maintenance Department PM forms
- Vehicle Fixed Asset (VFA) assessment and building and infrastructure completed by Milwaukee County per MTS TAM Plan
 - Description: Milwaukee County Facilities Division assesses the condition of all Milwaukee County Transit Facilities. They document and house all facility condition assessments within the Milwaukee County VFA database.
 - Follow up: The Value Facilities Assessment defines the facility components and sub-components, then grades these components on the industry standard universal life benchmark (ULB). The sum of these grades is then converted into a facility condition index score (FCI). The lower the FCI, the better the condition of the facility. (0-0.05 Good, 0.05-0.10 Fair, above 0.10 = Poor). The FCI benchmark is based on Milwaukee County Facilities Management Division metrics. Multiple preventive maintenance inspections are completed each month and filed with Buildings & Grounds
 - Documentation: Current Vehicle Fixed Accident report

-

- Trip / Run Report defect cards
 - Description: Document that Operators list bus safety and mechanical defects on. Issues on Defect card issues are minor in nature and the operator reports this to the Maintenance Clerk on pull-in so that it can be addressed by mechanics.
 - Follow Up: Maintenance department puts information from the Defect Card on the Bus Logbook so that repeated defects can be tracked over time.
 - Documentation: Defect Cards

- Maintenance Road Call
 - Description: A road call is when the operator calls dispatch for a major mechanical problem with the bus which then needs to be removed from service. “Chargeable” road calls are when there is an interruption in revenue service caused by preventable mechanical failures.
 - Follow Up: Maintenance department fixes and tracks all road calls and any repeat issue is reviewed by the garage managers. Any bus with the same problem within 30 days is noted.
 - Documentation: Road call log, defect cards

- 6,500-mile inspections
 - Description: All buses are inspected by a trained mechanic at the respective garage every 6500 miles. They inspect all major components on the bus including the chassis, engine compartment, operator compartment, and bus interior. They also analyze oil use and contents and change the oil and other fluids as needed.
 - Follow up: The mechanic records all findings on an inspection record card for the bus. The equipment engineer determines how each bus should be inspected based on notes on the inspection card. All cards are retained at Fleet Maintenance and are a part of the bus’s permanent record.
 - Documentation: Maintenance Department inspection form

Paratransit Department Hazard Reporting and Processing:

The Paratransit Compliance Audit Manager is responsible for contract compliance of service providers. The following are methods taken by MCTS to identify safety hazards in the contractor’s operations.

- Site visits to each agency conducted quarterly (see sample forms enclosed)
 - Description: Check list for onsite cleanliness, safety (OSHA requirement), customer service observation (if applicable), vehicle maintenance, drivers’ records, and operations processes (i.e. dispatching, reservations, etc.).
 - Follow Up: If any findings, the provider has a week to fix and submit documentation of fix in writing.
 - Documentation: Inspection log report

- Route shadowing
 - Description: The Paratransit Compliance Audit Manager selects random route and follows the route to assure driver is performing proper, safe, and efficient service.

- Follow Up: Any improper procedures observed are reported immediately to the provider, which the provider is to submit documentation of corrective action within 24 hours.
- Documentation: Inspection log report
- Accident/ Incident reporting
 - Description: In event of accident or incident involving service vehicle or client, the provider has 72 hours to report via documentation to the MCTS Paratransit Department.
 - Follow Up: Transit Plus assures protocol was properly followed (such as post-accident testing, conflict resolution, etc.), and if protocol was not properly followed and/or report not submitted within timeframe, liquidated damages will be assessed.
 - Documentation: Accident / Incident report
 -
- Cameras on vehicles
 - Description: The provider must have a minimum amount of cameras that fully cover high resolution video of all passenger seating and securement areas, all passenger boarding areas, the full driver area, and the roadway in front of the vehicle (about 3 cameras minimum). The provider is responsible for assuring cameras are properly working as part of their pre-trip inspections and during general maintenance.
 - Follow Up: The MCTS Director of Paratransit or designee can request at any time random footage from any vehicle to check camera function. Any camera system found not properly functioning will result in liquidated damages, and the vehicle will be removed from service until documentation of fix is received.
 - Documentation: Per provider
- Road supervisor investigation and report
 - Description: The provider must send a road supervisor to scene if there is a circumstance or event that disrupts, may pose a safety hazard, or could be outside of the scope of services provided by the MCTS Paratransit Department. Provider is to document and report issues to MCTS within 24 hours.
 - Follow Up: If necessary, the Compliance Audit Manager will go on site to assess the situation with the road supervisor. the MCTS Paratransit Department will reach out to client via letter to document results of on-site evaluation.
 - Documentation: Per provider
- New hire background checks, pre-hire drug testing, credentials assurance, and proof of training
 - Description: The provider must submit driver/ employee paperwork to the MCTS Paratransit Department upon hire that include background checks, pre-hire drug testing, credentials assurance, and a minimum of 80 hours proof of training.
 - Follow Up: Upon review by MCTS, any missing piece of the required paperwork and/or background checks that do not meet the requirements of our contract (such as more

than 3 moving violations within 3 years, etc.), the provider will be notified that the driver/ employee cannot conduct Paratransit service.

- Documentation: Per provider
- Proof of drivers' refresher training
 - Description: Providers offer drivers' refresher training annually and must provide proof of refresher training to the MCTS Paratransit Department.
 - Follow Up: the MCTS Paratransit Department must check with the provider at least twice a year to assure collection of refresher training document.
 - Documentation: Per provider
- Random drug and alcohol test selection for all safety sensitive employees
 - Description: Random selections are made monthly by our Medical Review Officer (MRO) for random drug and/or alcohol testing for all safety sensitive employees. Providers must submit notification forms to Transit Plus. Failure to send employee for testing and/or follow proper protocol will result in liquidated damages.
 - Follow Up: Transit Plus assures testing through collection of MRO reports and CCF forms from testing sites.
 - Documentation: Per Provider
- Post-accident and/or reasonable suspicion drug and alcohol testing
 - Description: Providers must send drivers for post-accident drug and alcohol testing after an accident or incident if vehicle was damaged and towed away, and/or client is transported to hospital. The provider also must send any safety sensitive employee for reasonable suspicion testing if during observation upon employee check in, the employee appears suspicious of substance abuse. Providers must submit notification forms to the Paratransit Compliance Audit Manager. Failure to send employee for testing and/or follow proper protocol will result in liquidated damages.
 - Follow Up: the MCTS Paratransit Department assures testing through collection of MRO reports and CCF forms from testing sites.
 - Documentation: Per provider
- Safety concerns reported by the client
 - Description: Clients can report any safety concerns and/or conflicts to either the agency and/or the MCTS Paratransit Department customer service liaison.
 - Follow Up: Provider has 72 hours to resolve complaint or liquidated damages will be assessed. Once complaint is resolved, it is officially documented on public record. If a driver is found to be operating in an unsafe manner, the driver can be removed from conducting Paratransit service.
 - Documentation: Per provider

5.2 Safety Risk Assessment

MCTS will use the Safety Risk Register to record, track and log reported hazards in the workplace. A Safety Risk Register is an information management tool used to document Safety Risk Management and Safety Assurance activities. It records the hazards identified, the potential consequences associated with these hazards, initial safety risk ratings, new mitigations implemented to eliminate or minimize the risk associated with the hazard, revised safety risk rating, and mitigation monitoring measures and activities to ensure the implementation and effectiveness of mitigations. MCTS also takes existing mitigations into account during safety risk assessment activities.

The Safety Risk Register serves a dual purpose:

- 1) It provides MCTS managers and the Safety Assurance Committee with an on-going, up-to-date picture of
 - (a) the overarching safety concerns that MCTS faces during transit service delivery and supporting operations, and
 - (b) the controls (safety risk mitigations) put in place to address them; and
- 2) It allows personnel involved in the agency's Safety Management System (SMS) to
 - (a) formally document hazards, potential consequences of the hazards, safety risk assessment results, and anticipated safety risk mitigations; and
 - (b) track the status of implemented safety risk mitigations.

After a safety issue or hazard has been identified, the actions required to address the hazard is determined by using the Risk Assessment Matrix. This Matrix will be used by front line supervisors in all departments to determine the consequence of the reported hazard, and the likelihood the consequence will happen, given MCTS' operating climate. Once the consequence and likelihood are determined, the supervisor will assign a risk rating and record the hazard, the risk on the Risk Register.

The Risk Register will capture all fields from the MCTS Safety Reporting form:

- Reporting Date/Time
- Date/Time hazard was noticed
- Location or Bus number
- Condition and Hazard type
- Suggestions to mitigate hazard
- Who hazard was reported to
- Contact information (optional)
- Follow up information

Training for MCTS Supervision on Safety Risk Assessment:

Supervisors in all MCTS departments will be initially trained on the following subjects to ensure the successful implementation of the ASP and SMS. Any new supervisor will be trained within 1 week of promotion and all supervisors will receive annual refresher training. All training materials will be taken from both the FTA website and MCTS Plan and presented by members of the MCTS SAC.

- SMS for Transit Agencies basics
- Promoting a Safety Culture
- Recognizing hazards in the workplace
- Hazard assessments and Risk Rating

- Communicating Safety in the Workplace
- Hazard Mitigation measures and record keeping.

MCTS Supervisors and the SAC will use this Matrix to determine the Risk Rating for all reported hazards based on the severity of the consequences of the hazard and the likelihood of that consequence happening. Reported hazards will be initially rated by the supervisor and the SAC will review that rating and determine if the mitigation efforts reduce the Risk Rating.

MCTS Risk Assessment Matrix

Step 1 - What is the Consequence of the hazard?				Step 2 - What is the Likelihood of the Consequence				
Consequences				Likelihood				
Severity	People Employee Passenger Other	Property/Assets MCTS or 3rd Party	Reputation MCTS or Milwaukee County	A	B	C	D	E
				Incredibly Rare /Improbable	Remote, not likely to occur	Could occur, or heard of it happening	Likely, to occur or has happened before	Common, or occurs frequently
1	First aid or no injury	No/Slight damage <\$500	No/Slight impact	A1 Low	B1 Low	C1 Low	D1 Low	E1 Medium
2	Slight injury, medical treatment	Minor damage \$501 to \$5000	Limited impact	A2 Low	B2 Low	C2 Medium	D2 Medium	E2 High
3	Serious injury, hospitalization more than 7 days	Moderate damage \$5001 to \$10,000	Local area impact	A3 Low	B3 Low	C3 Medium	D3 High	E3 High
4	Permanent total disability, or one fatality	Major damage \$10,001 to \$50,000	Major statewide impact	A4 Low	B4 Medium	C4 High	D4 High	E4 High
5	Multiple fatalities	Major damage Over \$50K	Major national impact	A5 Medium	B5 Medium	C5 High	D5 High	E5 High

Actions		Low Risk, continuous improvement
		Medium Risk, monitor and control
		High Risk, unacceptable/intolerable, immediately introduce further control measures

Direct Notifications		Department Head and Safety Assurance Committee
		Department Head and Safety Assurance Committee
		Dept. Head, SAC and Chief Safety Officer

Once the Risk Rating is determined, the supervisor will take the following actions and the re-evaluation will be done in coordination with the Department Head and SAC.

RISK VALUE	ACTIONS BASED ON RISK RATING	Re-evaluate in X days
A1 – A4	Record reported hazard, post and re-evaluate if repeated	30
A5	Investigate hazard, correct or issue work order, take equipment out of service until fixed	15
B1 – B3	Record reported hazard, post and re-evaluate if repeated	30
B4 – B5	Investigate hazard, correct or issue work order, take equipment out of service until fixed	15
C1	Record reported hazard, post and re-evaluate if repeated	30
C2 – C3	Investigate hazard, correct or issue work order, take equipment out of service until fixed	15
C4 – C5	Unacceptable / Stop action immediately	1
D1	Record reported hazard, post and re-evaluate if repeated	30
D2	Investigate hazard, correct or issue work order, take equipment out of service until fixed	15
D3 – D5	Unacceptable / Stop action immediately	1
E1	Investigate hazard, correct or issue work order, take equipment out of service until fixed	15
E2 – E5	Unacceptable / Stop action immediately	1

Example:

Hazard: A bus operator reports a large pothole on the Blueline to dispatch

Consequence: Possible damage to the bus and jostling of passengers every time a bus hits the pothole. It is also a hazard when other cars swerve to avoid the pothole.

Consequence Rating: A supervisor would rate the consequence as a “2” as a passenger might have slight medical treatment and there would be minor damage to the bus.

Likelihood Rating: This incident could happen multiple times per day with multiple vehicles, so the Likelihood would be rated as an “E”.

Actions: A rating of “2E” would mean that the supervisor must take immediate action and report the issue to the Safety Assurance Committee, the Department Head and Chief Safety Officer. Because Dispatch Contacted the city right away and put in a work order, this risk would be recorded after the mitigating measures took place. The Safety Assurance Committee will ensure the hazard and mitigating measures were posted, the pothole was filled and possibly follow back up with the employee who reported the hazard.

Completing the Risk Register:

Once a Risk has been evaluated and given a risk value – the hazard MUST be recorded on the Risk register for posting in the respective department and for evaluation by the Safety Assurance Committee. All medium hazards must be investigated and mitigated. For hazards that have been deemed as “high”, immediate action must be taken to stop the activity, assess and take action to mitigate the risks and the Department head, Safety Assurance Committee and Chief Safety Officer must be notified within 24 hours. The supervisor will fill out the following fields on the Risk Register:

- Consequences & Likelihood
- Risk Rating
- Mitigation Actions (see below)
- Notifications made
- Responsible Department
- Implementation Date
- Contact person

5.2 Safety Risk Mitigation

The goal of Risk Mitigation is to implement processes to reduce the likelihood and severity of the consequences of the hazard. The resolutions that are put into place may take place in different forms to achieve the necessary outcomes. All resolutions will be thoroughly investigated by the SAC based on the facts of the risk, past practice where applicable, and the use of Subject Matter Experts. The SAC will ensure that the resolution specifically addresses the hazard and does not create another hazard elsewhere in the operation. The MCTS safety risk mitigation process consists of avoiding, reducing, or segregating risk in the mitigation process.

Risk Avoidance – This involves selecting a different type of activity to accomplish the goals to avoid a hazard or stopping the operation or procedure that causes the hazard. This process reduces the likelihood rating of an event.

Risk Transfer – This is the practice of contracting or changing the responsibility of a hazardous practice to a third party. Risk Transfer involves insurance, contractual agreements and possibly hold-harmless agreements.

Risk Assumption – This is where MCTS is aware of the risk of the hazard and takes it on and is within our level of acceptability. These hazards and risks will be regularly monitored and reviewed. This action will only be taken when the Risk Matrix Value is Low.

Risk Segregation – This process is where hazard would be broken into separate parts or across multiple locations or across multiple duties or roles to reduce the severity and likelihood of the event. For example, If one duty requires lifting heavy parts multiple times, a supervisor might change the job to have multiple people complete the task to reduce repetitive injuries or fatigue.

All mitigation measures taken and the outcomes of those actions will be recorded and monitored on the MCTS Risk Register through the investigative process by the SAC during Risk Assurance and Monitoring.

5.3 Safety Risk Reduction Program

Risk Reduction is the practice of keeping an action, behavior, procedure to a minimum, or adopting actions to lessen the severity of the consequences. These mitigations usually involve a change in procedure, using a less hazardous substance, or changing how a task is performed. The Safety Risk Reduction Program includes but is not limited to data submitted to the National Transit Database, reducing the number and rate of injuries, and reducing vehicle accidents and assault on transit workers.

Vehicle and Pedestrian Accidents -- MCTS has a Vehicle Accident Review Committee (VARC) that reviews all vehicle accidents weekly to review accident severity, causal relationships, and ensure that other hazards were not contributing factors. The VARC also utilizes this time to identify possible trends in vehicle/pedestrian accidents, root causes of accidents, and unnecessary risks that can lead to an accident. The VARC addresses reducing vehicular and pedestrian accidents involving buses and takes into consideration measures to reduce visibility impairments for bus operators that may contribute to accidents.

Transit Worker Assaults – MCTS Safety and Security Department and Transportation Department meet weekly to discuss recent security related incidents. These discussions include addressing the mitigation of assaults on transit workers. These discussions include but are not limited to the deployment of assault mitigation infrastructure and technology on buses. MCTS has already installed operator shields and surveillance on buses, along with providing operators with de-escalation techniques.

5.4 Infectious Diseases

The Center for Disease Control (CDC) is responsible for controlling the introduction and spread of infectious diseases and provides assistance to agencies to assist in improving their disease prevention and control, environmental health and health promotion activities. The CDC provides resources for bus transit employees including how to protect themselves from exposure and guidance for proper cleaning and use of disinfectants. MCTS follows the current CDC and Milwaukee County Health Department recommendations which includes face coverings, social distancing, frequent handwashing, facility and vehicle cleaning and other measures to ensure the continued safety of transit employees and passengers. The following mitigations have previously been in effect, currently are in effect and/or can be reinstated as needed:

Frontline Workers

- Protective driver barriers
- Regularly disinfecting high touch surfaces
- Disinfecting / sanitizing buses on a nightly basis
- Placing hand sanitizer on vehicles
- Providing face masks
- Rear-door boarding when possible
- Suspending fares to limit passenger / operator contact
- Passenger capacity limits
- Limiting service to essential trips only
- Providing bleach/water solution and rags for operators to wipe down areas
- Using destination sign and social media to inform passengers
- Special air filters to clean circulated air
- Health questionnaire before coming to work
- Temperature check stations at each work location
- Posting CDC information on buses
- Requiring face masks

Office Workers

- Telework options for all employees when possible
- Alternate workdays by department
- Providing laptops / VPN access
- Microsoft Teams
- Requiring face masks
- Regularly disinfecting high touch surfaces
- Office closed to public
- Health questionnaire before coming to work
- Temperature check stations at each work location
- Public seating changed to wipeable surfaces
- Signage

6. Safety Assurance

Safety Assurance is the monitoring, measuring, and evaluating pillar of SMS. The Safety Assurance process will provide evidence as to whether the safety mitigations are performing as intended and will be a proactive source for safety performance data and predictive action. The Safety Assurance process will also identify changes that may introduce new safety risks in operation in support of service delivery. Here, MCTS will assure that our safety risk mitigation process are effective and that through the collection and analysis of data, we meet or exceed our safety objectives.

There are 3 required elements of the Safety Assurance Pillar, Safety performance monitoring and measurement, the Management of Change and Continuous Improvement. The MCTS Safety Assurance Committee is responsible for all Safety Assurance activities. The Safety Assurance Committee is made up of an equal number of MCTS management members and the plurality of frontline line workers (ATU 998) § 5329(d).

6.1 Safety Performance Monitoring and Measurement

MCTS ensures that all safety risk mitigations that are put in place are appropriate, adhered to and effective. Through the safety component of SMS, we actively monitor operations, safety reporting processes, inspections, and other workplace activities to ensure the desired goals are met without the introduction of additional risks. MCTS also investigates occurrences that resulted in an event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of MCTS.

6.1.A System Monitoring

Through the MCTS Safety Assurance Committee, MCTS will monitor compliance with and the sufficiency of all operations and maintenance procedures. This committee will review all safety performance targets and root cause analyses of incidents and accidents. They will use the Risk Register as a guideline for issuing recommendations and changes to procedures to the respective departments.

Other activities that the SAC will use to monitor the system or compliance are as follows:

- **Route Supervisor wellness checks and daily checks of street operations:** Any safety issues found by route supervisors during their work on the road will be sent to the Safety Committee through the Risk Register. The Manager of Street Operations will perform a risk assessment when reviewing Wellness Checks, Daily Logs, Checks of Pull Outs and Company Complaints.
- **Route Supervisor checks of operator pull-outs and pre-trip inspections:** Any safety issues found by Dispatcher during their shift will be sent to the Safety Committee through the Risk Register. The Supervisor of Dispatch Operations will perform a risk assessment when reviewing CAD/AVL logs, Radio Traffic and Major incidents reported to Dispatch.
- **Continuous checks of service and performance through dispatch office:** Through the Daily Accident and Incident Log, the Supervisor of Dispatch Operations will make sure that reports of safety events and issues is reported on the risk register.
- **Daily observations of stations and operators through station management staff:** Any safety issues found by Station or Garage Supervisors during their shift will be sent to the Safety Committee through the Risk Register by each Transportation Station Manager or Maintenance Garage Supervisor.
- **Review of maintenance inspections:** Buildings and Grounds employees send checklists monthly to the Supervisor for review and will ensure that all safety issues are reported, evaluated and tracked on the Risk Register.

- **Maintenance road calls and bus logs:** System reliability will be regularly monitored to look at road call frequency and severity.

6.1.B Risk Evaluation

The SAC will use the time period stated on the Risk Matrix to evaluate the mitigation measures of all reported hazards and ensure that the mitigation measures were effective, appropriate and did not cause any unforeseen consequences.

A file will be created for each reported hazard with all supporting investigations, reports and follow up communication.

6.1.C Incident Evaluation and Causal Factors

MCTS has developed an internal reporting system whereby all incidents and safety events reported to the dispatcher requires a written report. The employee will complete their report and the Safety, Security and Training department, who reviews the bus video for each event will track visible causal factors. If causal factors are not readily available, Risk Management will contact the supervisor of the area to discuss other factors that led to the incident or event. A report will be generated each month for review by the SAC and Executive.

MCTS has also established a Vehicle Accident Review Committee (VARC) that will review all vehicle accidents weekly to review accident severity, causal relationships and ensure that other hazards were not contributing factors. The VARC will report their findings to the Chief Safety Officer and SAC.

Contracted service providers will submit an accident/incident form to MCTS that includes their investigation and listing of causal factors that led up to that accident or incident. The Paratransit Compliance Audit Manager will report out to the SAC at the monthly meetings.

6.1.D Monitoring Safety Reporting Activity – MCTS Risk Register

The Safety Assurance Committee meets monthly (or as needed) to review all hazards reported and recorded on the Risk Register. For each hazard reported, the Committee will assess the actions taken and ensure the following:

1. The employee who reported the hazard is satisfied with the mitigation actions.
2. No new incidents/accidents were created as a result of the actions taken.
3. Track scheduled mitigation efforts if corrective action could not be taken right away.

The committee will ensure that each hazard is rated and mitigated. The hazard will be given a serialized number for easy reference so that all investigative details can be attributed to that hazard. The actions and discussions of the SAC will be tracked in the minutes of the meeting and posted to the company's intranet. The Risk register will be published and posted to the intranet which is available to all employees.

The following is the standing agenda of the Safety Assurance Committee:

AGENDA

1. New Safety Hazards Reported since previous meeting

2. Safety Assurance Process for Previously Reported Hazards
3. Accident/Incident Report Evaluation (Additions to the Risk Register)
4. New initiatives and Possible Hazards
5. Vehicle Accident Review Committee Report
6. Department updates from Members

6.2 Management of Change

MCTS is committed to identifying and assessing changes that may introduce new hazards or impact safety performance. The CSO and executive management will be responsible for reviewing and evaluating new non-safety related projects and incentives for possible safety hazards or issues. Each process will be carefully monitored for safety hazards.

MCTS may need to institute changes to policies or operations as a result of information received from such safety risks identified, regulatory requirements, new technology, new products or employee contracts. Changes to operations, organizational structure or equipment are evaluated through the risk management process prior to being implemented so additional safety risks are not created or increased. The process of change that MCTS follows is documented below:



The communication of changes to employees would be accomplished through bulletins, company bulletin boards in affected locations, the employee intranet, newsletters, email, changes to employee handbooks and manuals and additional in-person training as appropriate.

Paratransit providers are expected to follow the change management processes outlined in their attached Agency Safety Plans. Compliance is checked on a quarterly basis by the Paratransit Department.

6.3 Continuous Improvement

Continuous improvement helps MCTS assess its overall safety performance and how well its SMS is working and identify and address any other SMS issues. MCTS will carry out a full safety assessment when deemed necessary by identified safety deficiencies. If a transit agency identifies any deficiencies as part of its safety performance assessment, then the transit agency must develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies. The plan will include efforts to address underlying hazards and potential consequences through Safety Risk Management, changing data collection or analysis techniques to better understand what is really going on, and/or testing and evaluating new approaches to the SMS process.

Through the processes identified in the Safety Risk Management and Safety Assurance sections, MCTS is committed to the safety of our organization and community. Safety is of utmost importance and is an ongoing process that requires MCTS to always be open and adaptable to the necessary changes needed to remain free from risk.

Contracted Paratransit providers are expected to follow the processes outlined in their attached Agency Safety Plans.

6.4 Competencies and Training

All MCTS Employees, regardless of title, go through a substantial training and onboarding process prior to performing their specific role. The MCTS Human Resources Department trains all new employees, during their orientation on the MCTS Substance Abuse Policy, harassment policy, social media policy and electronics policy. Once in their department, employees are trained by their direct supervisor in office safety, emergency procedures and the safety reporting processes.

Additionally, the Transportation and Maintenance department train their safety-sensitive employees in the following areas:

Transportation - Bus Operators

MCTS Bus Operators are the face of the company by which the community see us. Bus Operators are trained both in the classroom by the MCTS training team and on the road by Instructors. Our Instructors are MCTS Bus Operators who have been hand selected and specifically trained to teach our newest employees the knowledge and skills necessary to be a professional, safe and courteous operator. Each new Bus Operator is trained with “safety-first mindset” meaning that Safety is above all things when delivering service.

MCTS utilizes the Transit Bus Operator Development Course from TAPTCO (The Transit and Paratransit Company) in the professional training of Bus Operators. This program consists of the following video components:

- Introduction to Professional Driving
 - Explains that new Operators must perform to higher standard, that passengers and other vehicles expect safety and emphasizes the need to always act professionally.

- Federal Regulations
 - Discusses regulations and how to comply with them.
- Fatigue Management
 - Discusses fatigue, symptoms and causes, offers tips on how to avoid fatigue.
- Wellness
 - Explains importance of wellness, including diet, exercise, rest and stress relieve to increase safety performance.
- Safety Best Practices
 - Defines *Safety, Risk and Accidents*, explains why people have accidents and what people can do to eliminate unsafe behaviors that lead to accidents.
- Introduction to The Bus
 - Provides a thorough introduction to the bus and systems
- Pre-Trip Inspections
 - Explains inspections are mandatory and how it reduces potential safety hazards
- Mirror Adjustments
 - Explains that mirrors must be relied upon, shows how to effectively use mirrors and reference points.
- LLLC Defensive Driving Skills
 - Explains the “Triple LC” program (look ahead, look around, leave room & communicate) system, understanding of the framework for professional driving.
- Driver Distractions
 - Explains the different types of driver distractions and how to prevent them.
- Following Distance
 - Explains the importance of proper following distance and teaches the process how to establish and maintain a proper following distance.
- Railroad Crossings
 - Explains the dangers of railroad crossings, teaches proper procedures for crossing tracks.
- Pedestrian Awareness
 - Explains how to always be aware of pedestrians, gives examples of high-risk pedestrian areas and teaches how to use the Rock-n-Roll method during turns to eliminate blind spots.
- Preventing Backing Accidents
 - Explains only to back when necessary and demonstrates how to back with a spotter.
- Merging, Lane Changing and Passing
 - Demonstrates and explains the proper procedure for each maneuver.

Additional classroom items include:

- MCTS Policies & Procedures
 - Explains policies and procedures as it relates to station procedures, vehicle operation and codes of conduct.
- ADA Sensitivity Skills
 - Explains the different types of disabilities, hidden disabilities, how to interact, ADA requirements and service animals. Describes the different types of mobility devices and the proper securement.
- Customer Service
 - Provides customer service skills training and role playing
- Passenger Interaction Skills

- Provides information passenger / operator stressors, verbal defense and de-escalation skills.
- Other Bus Equipment Training (Farebox, Clever Device, DCM, ADA Securement Devices)
 - Includes essential skill training for each type of equipment.
- Accident Prevention
 - Discusses different accident scenarios, how to prevent them and reinforces defensive driving skills. The difference between fault and preventable / non-preventable accidents is discussed and what to do in the event of an accident.
- Report Writing
 - Explains essential information necessary to complete a report and how to obtain it and hands on demonstration of completing accident and incident reports in SAFER system.

On-the-Road Training is detailed in the New Operator Training Manual and consists of the following:

- Driver training to obtain Commercial Driver's License
 - In compliance with Entry Level Driver Training requirement effective February 7, 2022.
 - Includes all the necessary skills and practice to pass the Wisconsin Department of Transportation Commercial Driver's License test, including pre-trip vehicle inspection, basic skills control and road test.
- Defensive Driving Skills
 - This includes a demonstration and practice of all defensive driving skills as identified in the classroom segments, including the LLC methods.
- Seat / Mirror adjustments
 - These critical adjustments are demonstrated and practiced throughout training including the importance of doing before the bus is moved.
- Right & Left turns
 - Shows students the proper way to set-up a turn on approach, how take to use push-pull method of steering, take turn at a walking pace and to rock-n-roll in seat to avoid blind spots.
- Urban and Freeway driving
 - Shows students how to drive in all driving situations including the proper use of signals, traffic checks, covering the brake at intersections, merging and keeping their space within their lane.
- Pulling in and out of bus stops
 - This provides demonstration and practice on how to approach a bus stop, when to pull-in, what to do if bus stop is blocked, where to safely alight passengers, when to pull-out of bus stop and how to merge safely back into traffic.
- ADA Securement Device Practice
 - Provides hands-on practice of securing a variety of types of mobility devices that they may encounter.
- Safety in the garages and yard
 - Shows how to properly enter and drive through garages, yard speed and pull over pits in the garage.
- Route training & familiarization
 - Allows students to see a demonstration of the route for note taking, drive the route in all directions for familiarization of routing, stops and potential hazards.
- In service training

- Allows students to operate in service with their instructor on-board to become familiar with all aspects of the position of bus operator.

Our Training Department also offers refresher and remedial as needed when identified through unsafe behaviors and accident investigations.

Transportation – Route Supervisors & Dispatchers

All MCTS Route Supervisors and Dispatchers were prior Bus Operators who excelled in safety and job performance and were selected through an extensive application and interview process. This allows for all employees in these positions to have knowledge of and understand the same core of safety beliefs as Bus Operators. Route Supervisors and Dispatchers follow all procedures as detailed in the MCTS Street Operations Manual that includes additional training in the following areas:

- Accident / incident investigation
 - Dispatcher’s priority is summoning assistance for the injured. Route Supervisor assess the scene and determines what caused accident. Gathers pertinent information and writes a detailed report.
- Post-accident, random and reasonable suspicion drug and alcohol testing
 - Route Supervisor determines whether a post-accident drug test must be performed using predetermined criteria set forth by the DOT. Dispatch and Route Supervisor schedule and help to facilitate random, as well as reasonable suspicion testing based on DOT guidelines and strict company protocol.
- Hazard identification
 - Route Supervisor often responds to hazardous concerns and #1 determines if a hazard exists, and #2 develops and implements a plan that eliminates or minimizes the hazard.
- Establishing route detours
 - Route Supervisor establishes detours based on what is safe and convenient. They also use the standard, “can our most inexperienced operator perform these maneuvers” the detour will require?
- Weapons protocol
 - Dispatch will immediately order the bus out of an area that is affected by off board weapons threats and detour subsequent buses away from the area. On board weapons incidents require a careful assessment of the incident. Operator and passenger safety is the #1 priority – the bus will be evacuated if it can be done so safely. All weapons incidents require the dispatcher to summon law enforcement. Route Supervisor and security are also sent to the scene, but observe and monitor from a distance until the threat is gone or the scene is secured by law enforcement, after which they can respond to the bus and offer support to the operator, passengers and to the law enforcement investigation.
- Security / Use of force
 - Transit Security officers can deploy use of force only as a last resort following a felony, or if their or an occupant of the bus is under direct threat of their personal safety. Security is trained in the proper use of pepper spray and physical restraint techniques.
- Verbal defense and de-escalation techniques

- Security is contracted out to a third-party security firm that provides extensive training in de-escalation techniques.
- National Transit Institute Assault Awareness and Prevention for Transit Operators
- Incident command
 - Dispatch is the control center for operations. We immediately respond to emergencies through our Computer Automated Dispatch/Automatic Vehicle Location (CAD/AVL) system which prioritizes calls based on operator input, through our phone network and observations through our fleet wide high-resolution camera system. We immediately summon local authorities and dispatch company personnel as needed as well as provide reporting to other departments and stakeholders.
- Mechanical trouble shooting / when to disable a bus
 - Trouble shooting is done to ensure safe operation and to protect equipment. Extensive training assists Dispatch and Route Supervisor with the knowledge needed to either disable a bus or swap it out with another one.
- Proper use of safety equipment (safety vests, traffic cones and vehicle amber lights)
 - Route Supervisors are required to use safety equipment and are provided with proper training on their use.
- Operator safety-checks
 - Route Supervisor will check operators for proper use of seat belts, ADA restraints, and compliance with our zero-use cell phone policy while the bus is in service.
- Sick Operators
 - Dispatch and Route Supervisor are trained to summon immediate medical assistance based on the operator's request and or observed or reported symptoms. Operators that are deemed safe to continue can do so if they are willing and if their illness does not present a safety hazard.
- Injured Operators
 - Injured operator's requiring immediate medical attention will have EMTs sent to them by dispatch. Operator's that are deemed safe can finish their shift or continue until they can be replaced based on their injury or preference
- Safe handling of sharps and Bloodborne Pathogens
 - Operators are instructed to never handle Bloodborne Pathogens or sharps by dispatch when incidents occur on the bus. Route Supervisor will handle bodily fluids and sharps if necessary. They are supplied with nitrile gloves as wells biohazard bags. Sharps are disposed of in approved sharps containers by the Route Supervisor.

Maintenance Department

Maintenance Department training is detailed in the Maintenance Department Training Manual and consists of the following components:

- Safe work methods
 - Monthly Safety Training Meetings that include eight (8) Safety and OSHA topics
- Shop safety
 - Monthly Safety Training Meetings

- OSHA standards
 - Fall Protection, Hazardous Communication & GHS, Hearing Conservation, Lockout/Tag Out (1910.147), Bloodborne Pathogens (1910.1030), PPE (1910.132), Fire Protection (1910.39), Emergency Preparedness (1910.38), Back & Lifting Safety
- Defensive driving techniques
 - Provided by the Transportation Department
- Vehicle maintenance
 - Minimum 3mo initial training, Ongoing Training, Vendor Training
- Lock out – Tag out
 - As required every year for Authorized, and effected employee – Month of August
- Material Safety Data Sheets
 - GHS Training, initially and every year April
- Proper Protective Equipment (PPE) usage and regulations
 - Initially upon New Hire Orientations-Supervisor Monitored. All PPE is provided to all maintenance employees at no cost to them.
- Disposal of contaminated materials
 - Bloodborne Pathogens training every year in the month of September. Company/Maintenance dept policy explained and enforced.
- Injury avoidance (walking, climbing, slip and fall, pushing, pulling, etc.)
 - Slips, Trips, & Falls training every year in the month of March. Class includes Ladder Safety, Walking Working Surfaces / Back & Lifting Safety Training every year Month of November.
- De-escalation techniques
 - National Transit Institute Assault Awareness and Prevention for Transit Operators

See the attached paratransit provider Agency Safety Plans for a description of training programs for safety related employees.

6.5 Safety Communication

The processes and activities that MCTS will deploy to communicate safety and safety performance information throughout the organization will consist of written, electronic, and in-person training. As a result, the MCTS Safety Promotion Committee was formed. The Committee consists of members of multiple departments within MCTS to help identify safety related issues and to provide recommendations to reduce accidents and increase safety throughout the company through recognition, incentives, and promotion.

This Committee's goal is to improve the Safety Culture at MCTS both organizationally and throughout the community that we serve: The Committee achieves the goal by:

- Implementing programs and providing communication to make employees feel that the company genuinely cares about their overall safety and well-being
- Reduce claims for injury and property damage as a result of an improved safety culture
- Provides safe and reliable public transportation to the community
- Provide positive image and maintain public trust

MCTS will regularly communicate safety and safety awareness information to employees: A Safety department member follows up directly with the reporter of a safety hazard if they are self-identified to let them know what actions were taken to address their report. A safety board is designated at all work locations for posting the Safety Policy, the updated Risk Register and any promotional information for safety issues.

The following are examples of the activities that recognize and communicate safe behavior:

- Monthly training events at each station
- Monthly Reconnect Classes
- Operator service awards
- Safety patches for years of safe driving
- Safety messages to Operators by data message
- Safety incentive programs
- Commendations for safe driving
- Transportation bulletins identifying hazards or new procedures or policies
- Training Supervisor at each station for assistance
- Refresher training as needed
- Postings at each work location
- Information broadcast on MCTS TV
- Company email notifications
- Employee newsletters – Inside MCTS

7. Additional Documents Referenced in this Plan

MCTS and its contractors will retain all required SMS documentation for at least three years and will make this documentation available upon request to the FTA or other oversight agencies. Information will be kept in the SMS Teams Site or in the Risk Management SMS E-folder. The following documents referenced in this plan will be maintained with the MCTS Agency Safety Plan:

- Triennial Review Maintenance Document Section #7 – Contains all maintenance inspection forms and checklists.
- Transit Asset Management (TAM) Plan
- Street Operations Manual
- Bus Operators Manual
- Maintenance Standard Operating Procedures
- Employee Handbook

8. Definitions of Special Terms Used in the Safety Plan

Safety performance target definitions:

Fatalities total number of reportable fatalities and rate per total vehicle revenue miles by mode

Injuries total number of reportable injuries and rate per total vehicle revenue miles by mode

System reliability - mean distance between major mechanical failures by mode or revenue miles operated divided by the number of major mechanical failures.

Major Mechanical Failure: system failures that prevent a vehicle from completing or starting a scheduled revenue trip because actual movement is limited or because of safety concerns

Accident: Event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

Event: Any Accident, Incident, or Occurrence.

Incident: 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.

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.

Safety 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 Federal Transit Administration (FTA).

Safety Performance Measure is a quantifiable indicator of performance or condition that is used to establish targets related to safety management activities, and to assess progress toward meeting the established targets

Serious injury means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

Other Definitions from the PTASP Final Rule:

Chief Safety Officer means an adequately trained individual who has responsibility for safety and reports directly to MCTS' general manager.

Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

Incident means an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rollingstock, 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.

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation means a method or methods to eliminate or reduce the effects of hazards.

Safety Assurance means processes within a transit agency's Safety Management System that 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 Management Policy means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety

Safety Management System (SMS) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation.

Safety Promotion means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

Safety Risk Management means a process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Transit Asset Management Plan means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by the FTA.

9. List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
MCTS	Milwaukee County Transit System
SEWRPC	Southeastern Wisconsin Regional Planning Commission
FTA	Federal Transit Administration
SMS	Safety Management System
PTASP	Public Transportation Agency Safety Plan
SAC	MCTS Safety Assurance Committee
TAPTCO	The Transit and Paratransit Company bus driver training course used by MCTS fixed route
CDC	Centers for Disease Control