
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.

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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	Steve Fuentes, President & CEO			
Name of Chief Safety Officer or SMS Executive	Nilsa Rosado-Jurkiewicz, Director of Risk Management/Chief Safety 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)	N/A
Does the agency serve a large, urbanized area?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Which large, urbanized area(s) does the agency serve?	Milwaukee

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 and Entity that Drafted this Plan	Milwaukee County Transit System	
Accountable Executive Signature	Signatures	Date of Signature
Safety Committee Approval	Name of Individual/Entity that Approved this plan	Date of Approval
	Safety Assurance Committee	
	Relevant Approval Documentation (title and location)	
Board of Directors or Equivalent Entity Approval	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 the Entity that certified the Transit Award Management System (TrAMS) and date	
	Milwaukee County Department of Transportation-February 6, 2023	

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 annually. If any changes are made, the Chief Safety Officer will present the changes to the Safety Assurance Committee for approval. Once the Safety Assurance Committee approves the update, 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. 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.

Does this plan address all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Website address where this Plan is published	https://www.ridemcts.com

Version Number and Updates

Record the complete history of successive versions of this plan.

Version Number	Section/Pages affected	Reason for Change	Date Issued
2020-1	All	New Plan	8/1/2020
2020-2	Section 4.4/9	Updated SAC members	9/14/2020
2020-3	Table of Contents	Changed numbering of Risk Mgmt. to be consistent	10/01/2020
2020-4	Page 1	Added signature	11/6/2020
2022-5	All	Updates based on FTA Review/Updated Safety Performance Targets	7/1/2022
2023-6	All	Updates based on FTA Review/Updated Safety Performance Targets	12/21/2023
2024-7	4,9,10,12,22,26	Safety Assurance Committee Amendments	
2025-8	All	Updates based on FTA Review/Updated Safety Performance Targets	6/9/2025

3. Safety Performance Targets

The Public Transportation Agency Safety Plan (PTASP) regulation requires MCTS to establish safety performance targets (SPTs) based on the safety performance measures (SPMs) established under the National Public Transportation Safety Plan.

As described in the National Safety Plan, MCTS must establish fourteen (14) Safety performance targets for both fixed route and demand response (Paratransit) services. These targets are:

Milwaukee County Transit System Safety Performance Targets for the year 2024

<u>Performance Target</u>	<u>Fixed Route</u>	<u>Demand Response (Paratransit)</u>
Total Major Events	57	5
Major Event Rate (per 1M VRM)	3.47	1.90
Collision Rate (per 1M VRM)	3.28	1.90
Pedestrian Collision Rate (per 1M VRM)	.12	.38
Vehicular Collision Rate (per 1M VRM)	3.16	1.52
Total Fatalities	4	0
Fatalities Rate (per 1M VRM)	.24	0
Transit Worker Fatality Rate	0	0

Total Injuries	139	22
Injury Rate (per 1M VRM)	8.45	8.38
Transit Worker Injury Rate	1.03	0
Total Assaults on Transit Workers	233	8
Transit Workers Assault Rate	14.17	3.05
System Reliability	4,045 miles	105,047 miles

4. Safety Performance Targets for the Safety Risk Reduction Program

The Public Transportation Agency Safety Plan (PTASP) regulation requires MCTS to establish safety performance targets (SPTs) set by the Safety Committee for the safety risk reduction program based on the safety performance measures (SPMs) established under the National Public Transportation Safety Plan. MCTS Safety Committee set these targets using a 3-yr rolling average of data reported to NTD.

As described in the National Safety Plan, MCTS must establish eight (8) Safety performance targets for both fixed route and demand response (Paratransit) services. These targets are:

Milwaukee County Transit System Safety Performance Targets for the Safety Risk Reduction Program for the year 2024 and 2025

<u>Performance Target</u>	<u>Fixed Route 2024</u>	<u>Demand Response (Paratransit) 2024</u>	<u>Fixed Route 2025</u>	<u>Demand Response (Paratransit) 2025</u>
Total Major Events	57	5	54	4
Major Event Rate (per 1M VRM)	3.47	1.90	3.29	1.80
Total Collisions	55	5	52	4
Collision Rate (per 1M VRM)	3.28	1.90	3.11	1.80
Total Injuries	139	22	139	21
Injury Rate (per 1M VRM)	8.45	8.38	8.03	7.96
Total Assaults on Transit Workers	233	8	221	8
Transit Workers Assault Rate	14.17	3.05	13.46	2.90

5. Coordination with the State and Metropolitan Planning Organization

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 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 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 Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Southeastern Wisconsin Regional Planning Commission	October 3 rd , 2023

6. Safety Risk Reduction Program

Risk Reduction is the practice of minimizing hazardous actions, behaviors, or procedures and adopting safer alternatives to lessen the severity or likelihood of adverse consequences. Risk reduction strategies may include procedural changes, the substitution of less hazardous materials, or modifications to how a task is performed.

The Safety Risk Reduction Program (SRRP) at MCTS is a comprehensive initiative that includes, but is not limited to:

- Reducing the number and rate of reportable injuries
- Reducing vehicle collisions and pedestrian incidents
- Reducing assaults on transit workers
- Incorporating and analyzing safety data submitted to the National Transit Database (NTD)
-

As part of the SRRP, the Safety Committee plays a central role in identifying and recommending appropriate safety risk mitigations based on formal safety risk assessments. These mitigations are included in, or incorporated by reference into, the Agency Safety Plan (ASP) and are reviewed periodically to ensure ongoing effectiveness.

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 Assault Mitigation-The MCTS Safety, Security, and Project Management Department and Transportation Department meet weekly to discuss recent security related incidents and security trends. These discussions include taking the appropriate steps to mitigate assaults on transit workers. These discussions include but are not limited to ensuring the proper deployment of transit worker assault mitigation efforts.

The Milwaukee County Transit System currently implements all FTA recommended transit works assault mitigations. Those include, but are not limited to:

- Transit Worker Area Protective Barriers
- Signage Informing Riders of Surveillance/Penalties
- Personal Security Training
- De-Escalation Training
- Operating Policies and Procedures & Communication Protocols
- Video/Audio Surveillance/CCTV Monitoring
- Covert/Overt Emergency Alarms
- Automatic Vehicle Location
- Patrol Strategies-Public Safety Officers (PSO's) & Transit Safety Officers (TSO's)
- Safety & Security Bulletins
- Monthly Security Meetings
- Scheduled Relief Points/Transport Vans
- Established Law Enforcement Relationship

7. Safety Assurance Committee Establishment, Membership and Procedures

Safety Assurance Committee Establishment, Membership, and Procedures

Establishment

The **MCTS Safety Committee** is established in accordance with 49 CFR Part 673 to support the implementation, oversight, and continuous improvement of the Agency Safety Plan (ASP) and Safety Management System (SMS). The Committee serves as the primary internal forum for identifying safety risks, evaluating mitigations, and monitoring safety performance across the organization.

ATU 998 and Local 9 will select frontline transit worker representatives for the Safety Assurance Committee. The Committee is appropriately scaled to the size, scope and complexity of the agency.

There is an equal number of management representatives and frontline transit representatives in the Safety Assurance Committee.

Membership

The Safety Committee is composed of representatives from key operational and administrative areas, including but not limited to:

- Chief Safety Officer (Chair)
- Safety & Security
- Risk Management
- Transportation
- Paratransit
- Union representative(s)

Additional staff, subject matter experts, or third-party contractors may be invited to participate in meetings as needed based on agenda topics.

Meeting Procedures

- Frequency – The Safety Committee convenes at least quarterly and may meet more frequently when emerging risks, significant incidents, or urgent assessments warrant immediate attention.
- Compensation policy – meetings are conducted during the business workday. Employees scheduled to work are compensated with their regular wages.
- MCTS Agency does not require members to attend special training.
- Agenda Development – The Chair prepares and distributes agendas in advance. Standing items include performance reviews, hazard reports, mitigation updates, policy discussions, and review of transit-worker safety-report submissions.
- Access to Information & Resources – Committee members have direct access to:
 - Safety performance dashboards, risk registers, and incident databases.
 - Submissions from the employee safety-reporting program.
 - Internal subject-matter experts (SMEs) and frontline transit workers who can be invited as advisors on specific topics.
 - Technical tools such as data-analysis platforms, mapping software, and vehicle-telematics reports, provided by the Safety Assurance team.
- Quorum & Voting – A quorum is achieved when more than 50 percent of appointed members are present. Decisions are reached by simple majority vote and recorded in the minutes.
- Documentation – A member of the SAC captures the meeting minutes, attendance, data reviewed, deliberations, recommendations, dissenting viewpoints, and assigned action items. Records are stored in accordance with the agency's recordkeeping policy.
- Dispute Resolution – If consensus cannot be reached, the Chair facilitates discussion; unresolved disputes are escalated to the Accountable Executive for final determination, with dissent noted in the minutes.
 - In a deadlock of the Committee exists if the vote of the Labor and Management group is equal on any safety proposal. Whenever a deadlock exists, the Labor and Management may seek a mutually agreeable mediator to assist in breaking the deadlock. If that mediation proves unavailing after 30 days, the parties shall select an Umpire with transit Safety experience to act as the tie breaking vote. If the parties cannot agree on an umpire they shall request a list from the Federal Mediation and Conciliation Service. The parties shall alternately strike names from the FMCS with the first strike being determined by chance. The Umpire shall only be empowered to vote for or against the proposal at deadlock. The majority vote shall be binding.
- Transparency – Key outcomes (e.g., safety-performance results, hazard mitigations, corrective

actions) are communicated agency-wide via transportation bulletins, internal emails, safety boards, MCTS TV, and the Inside MCTS newsletter.

Authority & Lines of Communication

- The Safety Committee reports directly to the Accountable Executive and provides annual briefings to the Board of Directors (or equivalent governing body).
- The Accountable Executive retains ultimate authority over safety-related decisions and resource allocation, while the Committee tracks implementation and effectiveness of its recommendations through the Safety Assurance process.

Access to Technical Experts

- The Committee may invite internal SMEs, frontline operators, maintenance technicians, union safety representatives, or external consultants to serve in an advisory capacity when specialized input is required.
- Advisors participate in deliberations but do not vote on formal recommendations unless formally appointed as committee members.

Contractor Involvement

Contracted Paratransit providers are required to establish and maintain their own safety committees consistent with their Agency Safety Plans. MCTS may invite representatives from these contractors to participate in the MCTS Safety Committee for coordination on shared safety initiatives or concerns.

8. Safety Management System

MCTS's Safety Management System is tailored to the size, scope, and complexity of the agency's operations. It integrates safety into daily activities and long-term planning by clearly defining responsibilities, managing risks, monitoring performance, and fostering a strong safety culture. By implementing this system, MCTS created a systematic approach to improving safety performance and enhancing operational reliability.

9. Safety Management Policy

Safety Management Policy Statement

At MCTS, safety is fundamental to every aspect of our operations and service delivery. Our Safety Management System (SMS) is designed and implemented in accordance with Federal Transit Administration (FTA) requirements outlined in 49 CFR Part 673. This policy affirms our unwavering commitment to fostering a proactive, data-driven, and collaborative safety culture throughout our organization.

Our Safety Objectives are as follows:

1. **Safety as a Mission Critical Directive (MCD):**
Safety is an essential, non-negotiable priority for MCTS. We will continuously examine all facets of our operations to identify and mitigate hazards. This will be achieved through robust and active employee hazard reporting, systematic safety reviews, and thorough analysis of safety data.
2. **Reliability as a Mission Critical Directive:**
By making safety our focus, MCTS ensures that the transit services we provide are consistently reliable and of high quality. We will clearly define the accountabilities and responsibilities for all staff involved in the development, implementation, maintenance, and continual improvement of our SMS. Our goal is to reduce preventable accidents and incidents across all work environments, including garages, properties, and buses. To support this goal, we commit to maintaining an Accident Review Committee to examine all incidents and their contributing factors, and to recommend preventive actions.

Description of the Safety Committee:

MCTS's **Safety Committee** plays a central role in our Safety Management System. It is composed of representatives from executive leadership, management, frontline operations, maintenance, and union or employee groups as applicable. The Safety Committee meets regularly to:

- Review of safety performance data and trends.
- Evaluate identified hazards and assess safety risks.
- Develop and monitor mitigation strategies.
- Support and promote the employee safety reporting program.
- Provide recommendations for improvements to policies, training, and operational practices.
- Review findings from the Accident Review Committee and ensure appropriate follow-up actions are implemented.

The Safety Committee ensures that safety concerns are addressed promptly and that all levels of the organization are actively engaged in maintaining and enhancing our safety culture.

Safety Management Policy Communication

MCTS is committed to ensuring that this Safety Management Policy is effectively communicated, clearly understood, and consistently reinforced throughout the entire organization and among our contracted service providers.

To achieve this:

- **Integration into Employee Handbook:** The Safety Management Policy will be incorporated into each employee handbook, ensuring that every employee has direct access to it as a part of their reference materials.
- **Annual Posting:** The Safety Management Policy will be posted annually on all designated Safety bulletin boards at each company location to maintain high visibility and ongoing awareness.
- **Safety Assurance Committee (SAC) Meetings:** The MCTS Safety Assurance Committee (SAC) meets monthly — or more frequently if necessary — to review safety issues, set safety priorities, and identify and monitor hazards. The SAC provides regular updates on these matters directly to the accountable executive(s).
- **Work Location Engagement:** The SAC will also meet regularly with employees at each work location to discuss safety concerns, report progress on safety initiatives, and promote two-way communication about safety performance and needs.
- **Contracted Service Providers:** MCTS is committed to ensuring that all contracted Paratransit providers likewise post and share their own corporate Safety Management Policies with their employees to align with MCTS's safety expectations and standards.

Through these integrated communication efforts, MCTS ensures that the Safety Management Policy remains a living document — guiding daily decision-making, empowering employees to actively participate in hazard reporting, and fostering a safety-first culture across our transit system and contracted operations.

Authorities, Accountabilities, and Responsibilities

Management holds ultimate responsibility for ensuring the safe and secure operations of MCTS and all contracted service providers. Every employee is expected to fulfill specific safety responsibilities appropriate to their role, in full compliance with the Public Transportation Agency Safety Plan (PTASP). The descriptions below outline the safety-related duties and reporting structure for each position. A detailed table on the following page further defines the system safety responsibilities assigned to each role.

Accountable Executive

Steve Fuentes, President & CEO

The Accountable Executive meets all the requirements in [§673.5](#) and [§673.23\(d\)\(1\)](#). The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for MCTS's safety will not

be delegated and always rests with the Accountable Executive.

This position is ultimately responsible for:

- Ensuring that the agency's SMS is effectively implemented throughout the system and action is taken, as necessary, to address substandard performance in the agency's SMS.
- 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.
- Implementing safety risk mitigations for the safety reduction program that are included in the Agency Safety Plan (ASP)
- Receiving and considering all other safety risk mitigations recommended by the Safety Committee.
- 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.
- Signing the Agency Safety Plan and any updates

Chief Safety Officer or SMS Executive

Nilsa Rosado-Jurkiewicz, Director of Risk Management/ Chief Safety Officer

The Chief Safety Officer is designated by and directly reports to the Accountable Executive. The Chief Safety Officer is an adequately trained individual who has responsibility for safety.

This position is ultimately responsible for:

- Day-to-day implementation and operation of the SMS.
- 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.

Safety Assurance Committee Members

Armond Sensabaugh, Transportation Coordinator

Mathew Storvick, Maintenance Administration Manager

David Locher, Enhanced Transit Manager

Chris Fox, Paratransit Compliance Audit Manager

Nilsa Rosado-Jurkiewicz, Director of Risk Management/Chief Safety Officer

Matthew Kennedy, Safety & Security Manager

Brittany Bertsch, Director of Safety, Security & Project Management (Alternate)

Five front line workers (ATU 998) Michael Brown(VP), Donnell Shorter, Yolanda Nash, Tanita Dickerson, Ronald Nelson

One front line worker (Local 9) Gail Hirsch

One alternate front line worker (Local 9) Alesha Monk

One alternate front line worker (ATU 998) Bruce Freeman

The Safety Assurance Committee is responsible for:

- Reviewing and approving the Agency Safety Plan (ASP) and any updates (before approval by the Board of

Directors/equivalent entity)

- Setting annual performance targets for the safety risk reduction program
- 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, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.
- Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.
- Identifying safety deficiencies for purposes of continuous improvement, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

Agency Leadership and Executive Management

Sandra Kellner, Chief Administrative Officer

- MCTS Leadership and Executive Management member, other than the Accountable Executive and Chief Safety Officer, who has the authorities or responsibilities for the day-to-day implementation and operation of the SMS.

SMS Project Managers and Key Staff

Brittany Bertsch, Director of Safety, Security & Project Management

Jason Scheelk, Training Manager

Matthew Kennedy, Safety & Security Manager

Mathew Storvick, Maintenance Administration Manager

Chris Fox, Paratransit Compliance Audit Manager

Kevin Pumphrey, Chief Operations Officer

Dwayne Reese, Director of Maintenance

Frances Musci, Director of Paratransit

Ben Stark, Chief Human Resources Officer

- Key staff that support the Accountable Executive, Chief Safety Officer/SMS Executive, and Safety Assurance Committee in developing, implementing, and operating the SMS

Transdev(Contracted Service)

Patrick O'Brien, General Manager

This position oversees the operations of Transdev and has a direct line of reporting, without intermediaries, to the Paratransit Compliance Audit Manager.

This position is ultimately responsible for:

- 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.

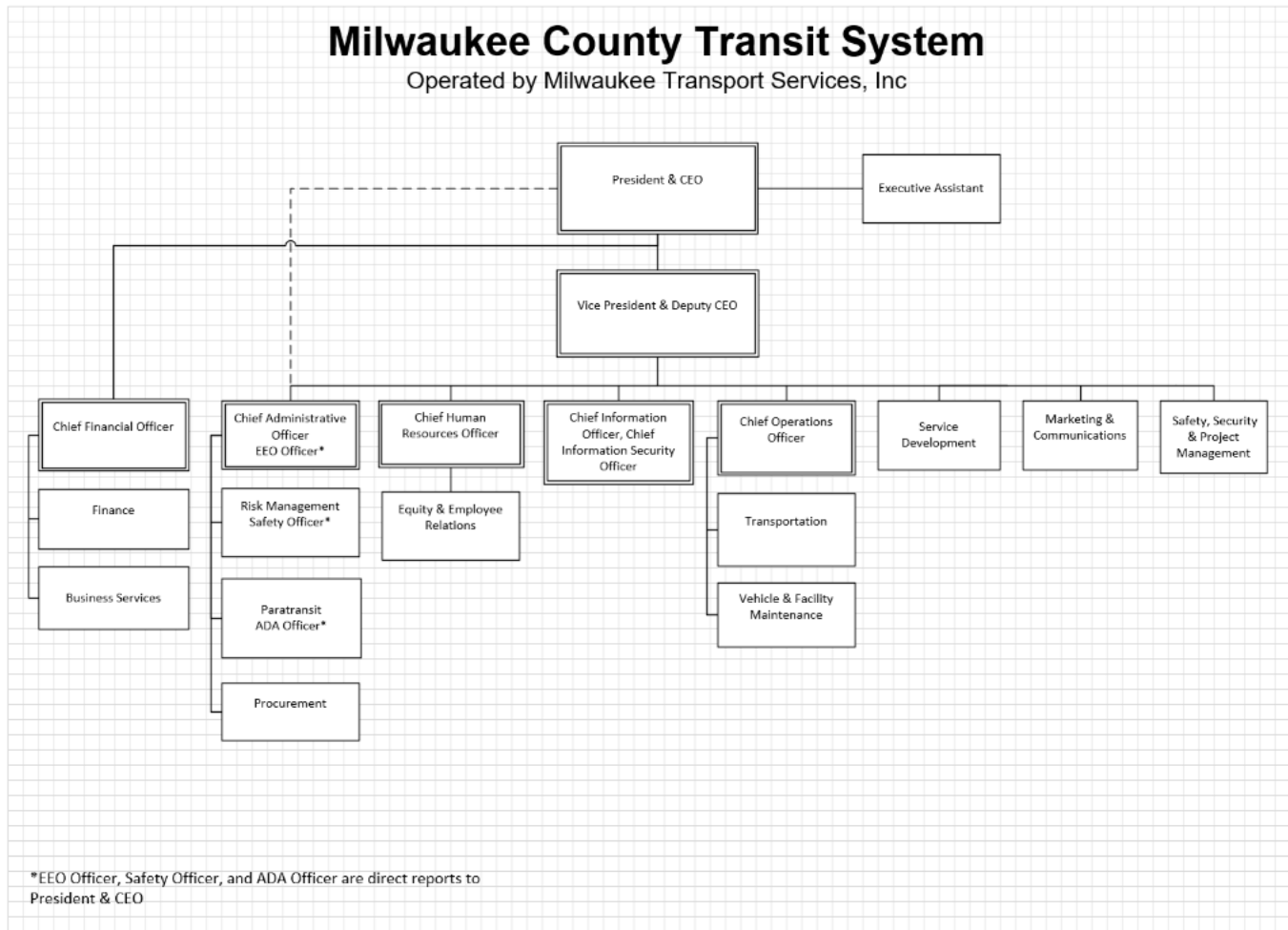
Transdev Safety Manager

Toni Tarantino, Safety Manager

This position oversees the safety of Transdev and has a direct line of reporting, without intermediaries, to the Paratransit Compliance Audit Manager.

This position is ultimately responsible for:

- Assisting with carrying out the Agency Safety Plan (ASP)
- Resolving safety hazards and mitigating future hazards
- Coordinates monthly Safety Solutions Team (SST) and driver safety meetings



Employee Safety Reporting Program

MCTS is dedicated to maintaining the highest possible standards for safe transit operations. All employees are encouraged and fully empowered to report any incidents, hazards, or situations that could compromise the safety of our operations, without fear of retaliation. This reporting process includes, but is not limited to, incidents such as assaults on transit workers, near misses, unsafe acts, and hazardous conditions.

Every employee and contracted service provider shares responsibility for promptly communicating any information that may affect the safety of the transit system. Safety reporting is strictly protected from any form of reprisal. Employees are encouraged to include their contact information when submitting reports so that additional details or follow-up questions can be addressed, ensuring timely and effective resolution. 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 the 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 Foreman, Shift Supervisor or Garage Manager
- By Phone to the Dispatch Office
- By contacting the 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 and, therefore, are excluded from protection:

- 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 pain or drowsiness.

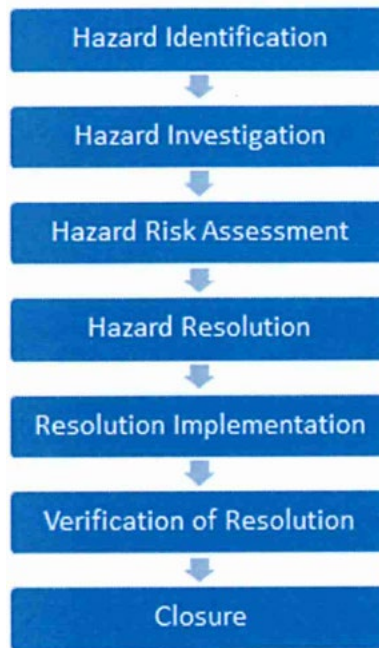
Paratransit:

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 Paratransit Compliance Audit Manager.

10. 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 are outlined in the following diagram.



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.

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
 - b. the controls (safety risk mitigations) put in place to address them
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
 - b. track the status of implemented safety risk mitigations.

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

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

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

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 utilizes audits and reviews conducted by the FTA, TSA, Milwaukee County Department of Transportation, and other oversight authorities as important sources for hazard identification and reporting. When deficiencies are identified through after-action reports, they are documented in the MCTS Risk Register and addressed by the responsible department to implement appropriate corrective actions and mitigation measures.

As additional sources for hazard identification, MCTS considers safety concerns identified through its ongoing Safety Assurance activities, as well as data and guidance from the Centers for Disease Control and Prevention (CDC) and relevant state health authorities regarding exposure to infectious diseases. These inputs help ensure that MCTS proactively identifies and addresses a broad range of operational and public health hazards to maintain a safe transit system.

Transportation Department Hazard Reporting and Processing:

- Pre-trip vehicle inspections
 - o Description: Inspection by Operator before vehicle is operated to determine road worthiness.
 - o Follow Up: If any defects are found, Maintenance is notified for repairs.
 - o Documentation: Defect Cards are kept by the Maintenance Department.
- Trip/ Run Report defect cards
 - o 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.
 - o Follow Up: Maintenance department puts information from the Defect Card on the Bus Logbook so that repeated defects can be tracked over time.

- o Documentation: Defect Cards
- Maintenance Road Call
 - o 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.
 - o 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.
 - o Documentation: Maintenance Road call log
- Wellness checks for Operators by Route Supervisors
 - o Description: Route Supervisors will board buses at random to interview operators to identify potential safety hazards and to monitor operator's compliance with system regulations.
 - o 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.
 - o Documentation: Google Forms spreadsheet
- Bus Stop Committee
 - o Description: Determines the locations of bus stops throughout the system and submits for approval(s) as needed.
 - o Follow Up: Consults with Transportation and Paratransit Departments to ensure that each stop is safe for passengers, equipment and is ADA compliant.
 - o Documentation: Bus Stop Committee Teams site
- Accelerometer videos
 - o 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 include hitting curbs, turning too quickly or abrupt stopping.
 - o Follow Up: Information from each video clip is reviewed and sent to the Supervisor and Training Department for additional training as needed.
 - o Documentation: Apollo Camera Video System
- Post-accident training reviews to identify and correct unsafe driving behaviors.
 - o Description: Training reviews occur after an Operator has an accident that is determined to be preventable.
 - o Follow Up: The Training Department meets with each Operator individually to identify and correct unsafe driving behaviors and to discuss their preventable accidents, offer suggestions on how to avoid a like accident in the future and a ride evaluation to review all skills.
 - o Documentation: Training Review tracking form
- Public complaints
 - o Description: Complaints from the public, including passengers, that are received at MCTS through either phone call, email, Facebook or RideMCTS.com website.
 - o Follow Up: Customer's information is entered, and complaint is investigated.

If complaint is valid, Supervisor will interview Operator and re-instruct as needed.

- o 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
 - o Description: Issues that are brought up through the Union that are a result of Operator input through Union Steward.
 - o Follow Up: Complaint is investigated, and appropriate department(s) notified.
 - o Documentation: Email information
- Proposed route changes or new routes
 - o Description: All new routes or changes for existing routes are reviewed
 - o Follow Up: The Training Department, along with members from the Service Development Department, will evaluate all the new routes 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, buses and surrounding environment.
 - o Documentation: Planning/Training files, Bus Stop Committee, Teams site
- Safety or hazard concerns as reported to company management
 - o 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.
 - o Follow Up: MCTS will use the Safety Risk Register to record, track and log hazards in the workplace.
 - o Documentation: Safety Risk Register
- Safety or hazard concerns as reported online MCTS Safety Reporting System.
 - o Description: Safety or hazard concerns that were entered into the MCTS Safety Reporting System.
 - o Follow Up: MCTS will use the Safety Risk Register to record, track and log hazards in the workplace.
 - o Documentation: Safety Risk Register
- Information provided to Dispatch
 - o Description: Operators will contact Dispatch via two-way radio or telephone to report roadblocks, accidents, construction or other unsafe items observed while in service.
 - o 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.
 - o Description: Hazards may be identified through internal meetings. When identified, it will be entered in the MCTS Safety Reporting System.
 - o 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.
- o Documentation: Safety Risk Register

Transit Asset Management Plan

The purpose of the Milwaukee County Transit System (MCTS) Transit Asset Management (TAM) Plan is to guide the assessment, prioritization, and investment in revenue and non-revenue vehicles, equipment, infrastructure, and facilities. The plan outlines processes for procuring, operating, inspecting, maintaining, rehabilitating, and replacing capital assets to manage performance, risks, and costs throughout their life cycles, ensuring safe, cost-effective, and reliable public transportation. Once implemented, these processes will support the development of a long-term strategic vision for achieving and maintaining a State of Good Repair (SGR), using objective standards to measure asset conditions. While there are no formal requirements linking TAM with the Safety Management System (SMS), the two systems share several nexus points that enhance agency-wide decision-making, including executive oversight, the identification of safety risks through condition assessments, performance monitoring through TAM data, prioritization of asset repair or replacement via safety risk assessments, and the alignment of risk assessment outcomes with TAM resource planning.

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
 - o 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.
 - o 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.
 - o Documentation: Maintenance Department Training files
- Preventative Maintenance (PM) Forms
 - o 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.
 - o Follow up: any defects noted, and repairs made are entered into the MCTS Dynamics 365 Maintenance request 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.
 - o Documentation: Maintenance Department PM forms
- Value Facilities Assessment (VFA) and building and infrastructure completed by Milwaukee County per MCTS TAM Plan
 - o 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.

- o 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
- o Documentation: Current Vehicle Fixed Accident report
- Trip/ Run Report defect cards
 - o 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.
 - o Follow Up: Maintenance department puts information from the Defect Card on the Bus Logbook so that repeated defects can be tracked over time.
 - o Documentation: Defect Cards
- Maintenance Road Call
 - o 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.
 - o 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.
 - o Documentation: Road call log, defect cards
- 6,500-mile inspections
 - o 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.
 - o 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.
 - o Documentation: Maintenance Department inspection form

Paratransit Department Hazard Reporting and Processing:

The Paratransit Compliance Audit Manager is responsible for contract compliance with 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)
 - o 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.).
 - o Follow Up: If there are any findings, the provider has a week to fix and submit documentation of fix in writing.

- o Documentation: Inspection log report
- Route shadowing
 - o Description: The Paratransit Compliance Audit Manager selects random route and follows the route to assure driver is performing proper, safe, and efficient service.
 - o 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.
 - o Documentation: Inspection log report
- Accident/ Incident reporting
 - o Description: In the event of an accident or incident involving a service vehicle or client, the provider has 72 hours to report via documentation to the MCTS Paratransit Department.
 - o 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, Compliance Audit Manager addresses issues and works with the vendor to ensure proper protocols are followed.
 - o Documentation: Accident/ Incident report
- Cameras on vehicles
 - o Description: The provider must have a minimum number 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.
 - o Follow Up: The MCTS Director of Paratransit or designee can request random footage from any vehicle to check camera function. Any camera system found not properly functioning will result in the vehicle being removed from service until documentation of fix is received.
 - o Documentation: Per provider
- Road supervisor investigation and report
 - o 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. The provider is to document and report issues to MCTS within 24 hours.
 - o 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 clients via letter to document results of on-site evaluation.
 - o Documentation: Per provider

- New hire background checks, pre-hire drug testing, credentials assurance, and proof of training
 - o 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.
 - o 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.
 - o Documentation: Per provider

- Proof of drivers' refresher training
 - o Description: Provider drivers are required to complete refresher training annually and must provide proof of refresher training to the MCTS Paratransit Department.
 - o Follow Up: the MCTS Paratransit Department checks with the provider monthly to ensure collection of refresher training document.
 - o Documentation: Per provider

- Random drug and alcohol test selection for all safety sensitive employees
 - o Description: Provider's Medical Review Officer (MRO) pulls selections for random drug and/or alcohol testing for all safety sensitive employees. The provider must submit copies of all testing documents to Transit Plus.
 - o Follow Up: Transit Plus assures testing through collection of MRO reports CCFs and results from vendor.
 - o Documentation: Per Provider

- Post-accident and/or reasonable suspicion drug and alcohol testing
 - o 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.
 - o Follow Up: Transit Plus assures testing through collection of MRO reports, CCFs, and results from vendor.
 - o Documentation: Per provider

- Safety concerns reported by the client
 - o Description: Clients can report any safety concerns and/or conflicts to either the agency and/or the MCTS Paratransit Department customer service liaison.
 - o 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.

- o Documentation: Per provider

Safety Risk Assessment

MCTS has established a process to assess the safety risk associated with identified hazards. This assessment includes an assessment of the likelihood and severity of the potential consequences of identified hazards to determine if safety risk mitigation is necessary and to inform prioritization of safety risk mitigation. MCTS also takes existing mitigations into account during safety risk assessment activities.

After a safety issue or hazard has been identified, the actions required to address the safety risk of the potential consequences of the hazard are 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.

Training for MCTS Supervision on Safety Risk Assessment:

Supervisors in all MCTS departments will be initially trained in 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
- Communicating Safety in the Workplace
- Reasonable Suspicion Training
- Recognizing Hazards in the workplace
- Hazard assessments & Risk Rating
- Hazard Mitigation measures & recordkeeping

(See Appendix A & B for MCTS Substance Abuse Policy and Post-Accident or Reasonable Suspicion Drug & Alcohol Testing Form)

MCTS Supervisors and the SAC will use this Matrix to determine the Risk Rating for potential consequences of identified hazards based on the severity of the consequences of the hazard and the likelihood of that consequence happening. Risk assessments 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.

Safety Risk Mitigation

The goal of Safety Risk Mitigation at MCTS is to implement effective processes or methods to identify safety risk mitigation necessary because of our Safety risk assessment process to reduce the likelihood and severity of the potential consequences of identified hazards. Mitigation measures may take various forms to achieve the desired safety outcomes and will be tailored to the specific nature of each risk.

The Safety Assurance Committee (SAC), will identify mitigations based on safety risk assessments by analyzing the facts of each risk, considering past practices where applicable, and consulting with relevant Subject Matter Experts (SMEs). The SAC ensures that every mitigation strategy directly addresses the identified hazard and does not inadvertently introduce new hazards elsewhere in the operation.

MCTS uses multiple methods to identify and implement safety risk mitigations or strategies as part of its safety risk assessment process. These include:

Safety Committee Role: The SAC plays a central role in identifying, developing, recommending, and overseeing safety risk mitigations. It actively reviews risk assessments and proposes appropriate actions to minimize risks.

Oversight Guidance: MCTS incorporates recommendations and guidance from oversight authorities, such as the Federal Transit Administration (FTA) and, where applicable, other regulatory bodies, when determining suitable safety risk mitigations.

Public Health Guidance: MCTS also considers guidelines issued by the Centers for Disease Control and Prevention (CDC) and relevant state health authorities to prevent or control exposure to infectious diseases as part of its hazard control measures.

Risk mitigation strategies at MCTS generally include:

Risk Avoidance: Choosing alternative activities, procedures, or operations to avoid a hazard altogether, or suspending an operation that poses an unacceptable risk. This directly reduces the likelihood of an adverse event.

Risk Transfer: Shifting responsibility for a hazardous activity to a third party through contracts, insurance, or hold-harmless agreements to manage exposure and liability.

Risk Assumption: Consciously accepting a known risk that falls within MCTS's acceptable risk threshold (Low Risk according to the Risk Matrix). These risks are continuously monitored and periodically reviewed.

Risk Segregation: Dividing a hazardous task into separate components, distributing tasks across different roles or locations, or modifying duties to reduce the severity and likelihood of harm. For example, sharing repetitive heavy-lifting tasks among multiple employees to prevent fatigue and injury.

Vehicular and Pedestrian Safety:

When identifying mitigations for the safety risk reduction program, especially for vehicle and pedestrian safety events involving transit vehicles, or when addressing a missed safety performance target set by the SAC, MCTS and the SAC specifically consider actions to reduce operator visibility impairments that contribute to collisions. This includes evaluating retrofits for existing vehicles in revenue service and specifying design requirements for future vehicle procurements that improve operator lines of sight.

Assaults on Transit Workers:

When identifying mitigations for the safety risk reduction program related to assaults on transit workers including hazards or missed targets involving operator assaults, MCTS and the SAC specifically consider installing or upgrading assault-mitigation infrastructure and technology, such as barriers or shields that block entry of unwanted individuals or objects into the bus-operator

workstation, and related monitoring or emergency-alert systems.

Integration into the Agency Safety Plan (ASP)

All safety-risk mitigations the SAC identifies and recommends, whether addressing vehicular/pedestrian events or assaults on transit workers are included in, or incorporated by reference into, the ASP. Each entry specifies the responsible department, implementation timeline, performance indicators, and review schedule. **SEE SECTION ABOVE-Transit Worker Assault Mitigation**

Decision Accountability:

If the SAC recommends a safety risk mitigation measure unrelated to the safety risk reduction program and the Accountable Executive chooses not to implement it, the Accountable Executive will prepare a written statement explaining the decision. This statement will be submitted to and presented before the SAC and the MCTS Board of Directors (or equivalent governing body) for transparency and recordkeeping.

Documentation and Monitoring:

All mitigation measures, along with their implementation status and resulting outcomes, will be documented and tracked in the MCTS Risk Register. The SAC will monitor these actions as part of its ongoing Safety Assurance and Monitoring process to ensure that each mitigation remains effective and continues to control the associated risk as intended.

Infectious Diseases

As a source of safety risk mitigation, MCTS considers guidelines to prevent or control exposure to infectious diseases provided by the Center for Disease Control (CDC) is responsible for controlling the introduction and spread of infectious diseases and aids agencies to assist in improving their disease prevention and control, environmental health and health promotion activities.

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 to ensure the continued safety of transit employees and passengers.

11. 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 is 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).

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.

System Monitoring

MCTS will monitor compliance with and the sufficiency of all operations and maintenance procedures. MCTS 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 for the respective departments.

Other activities to monitor the system or compliance are as follows:

- **Route Supervisor wellness checks and daily checks of street operations:** The Manager of Street Operations will review 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 Manager of Operators. 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 are reported to MCTS.
- **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.

Safety Risk Mitigation Monitoring

The SAC will use the 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.

Investigation of Safety Events to Identify Causal Factors

MCTS has developed an internal reporting system whereby all incidents and safety events reported to the dispatcher require a written report. The employees will complete their report and the Safety, Security and Training department, who review the bus video for each event will track visible causal factors. MCTS identifies organizational, equipment & infrastructure, external, human and environmental 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 Team.

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 are 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.

Monitoring Internal Safety Reporting Program

The Risk management to review all hazards reported and recorded on the Risk Register. For each hazard reported, the Risk Management will assess the actions taken and ensure the following:

OSHA reports, Drug & alcohol reports, employee safety reporting program (anyway an employee can report safety issues) who monitors this.

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

MCTS will ensure that each hazard identified during monitoring activity 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 MCTS intranet which is available to all employees.

Management of Change

MCTS is committed to identifying and assessing changes that may introduce new hazards or impact safety performance. The Chief Safety Officer 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 because 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 Compliance Audit Manager.

Continuous Improvement

Continuous improvement enables MCTS to identify efficiencies in its Safety Management System (SMS), and in our performance against safety performance targets and risk reductions program targets.. This section outlines the annual process, led by the Safety Committee and the Accountable Executive, assessing safety performance, addressing gaps, and ensuring the Agency Safety Plan (ASP) remains current.

Annual Safety Performance Assessment

- Compile Data- Gather the most recent 12 months of safety data, including performance indicators, safety event logs, audit results, and stakeholder feedback.
- Evaluate overall SMS performance- Compare results against the agency-wide safety performance targets (SPTs) in the ASP and identify systemic SMS deficiencies.
- Review Safety Risk Reduction Program (SRRP) Targets- Compare outcomes against the annual SPTs set by the Safety Committee specifically for the SRRP (e.g., operator-assault and collision targets).

- Identify Deficiencies-SMS processes and resources, overall agency SPT's, annual SRRP SPT's.

Continuous Monitoring Throughout the Year

- **Dashboards & Scorecards** – Monthly dashboards track performance against both agency-wide SPTs and SRRP SPTs.
- **Quarterly Safety Committee Reviews** – The Committee validates data accuracy, confirms trends, and directs additional analyses as needed.
- **Contractor Oversight** – Contracted Paratransit providers must perform equivalent monitoring in line with their approved Agency Safety Plans and submit quarterly performance reports to MCTS.

Corrective Action When a Target Is Not Met

If any *annual SRRP* target is missed:

1. **Safety Risk Assessment** – The Safety Committee triggers a formal safety-risk assessment to quantify the risk posed by the missed target.
2. **Safety Risk Mitigation** – Mitigations are developed in accordance with the SMS Safety Risk Mitigation process. Typical actions may include:
 - Engineering controls (e.g., retrofitting bus operator barriers).
 - Enhanced training, procedures, or supervision.
 - Technology upgrades or process redesigns.
3. **Incorporation into the ASP** – All mitigations are documented in, or incorporated by reference into, the ASP with clear owners, timelines, and performance indicators.
4. **Budget Allocation (“Safety Set-Aside”)** – In the subsequent fiscal year, MCTS dedicates its 49 U.S.C. 5307 safety set-aside funds to projects reasonably likely to improve performance on the missed SRRP target(s).

Deficiency-Resolution Plan(s)

When the annual assessment uncovers *any* SMS deficiency (overall or SRRP-specific):

- The **Accountable Executive** directs the development of a formal plan, endorsed by the Safety Committee, to eliminate the deficiency.
- Each plan includes:
 1. **Root-Cause Analysis** – Identification of underlying hazards and contributing factors.
 2. **Corrective Actions & Mitigations** – Measures derived from the Safety Risk Management process.
 3. **Resource Allocation & Timeline** – Budget, staffing, and target completion dates.
 4. **Performance Metrics** – Indicators to verify effectiveness.
- Progress is tracked in the Risk Register and reported to the Board of Directors annually.

Safety Committee’s Role in Continuous Improvement

- **Leadership & Oversight** – Chairs all assessment meetings and endorses plans before submission to the Accountable Executive.
- **Decision Authority** – Recommends reallocating resources or revising targets when data show persistent gaps.
- **Validation** – Confirms completion and effectiveness of mitigations; re-opens items if targets remain unmet.

All contracted Paratransit providers must:

- Follow the processes specified in their Agency Safety Plans (incorporated by reference into the MCTS ASP).
- Conduct their own annual safety-performance assessments and submit findings to MCTS.
- Participate in any joint deficiency-resolution efforts when shared hazards are identified.

12. Safety Promotion

Competencies and Training

All MCTS employees, regardless of title or department, participate in a comprehensive training and onboarding program prior to assuming their specific duties. This program is designed to ensure that every employee understands the policies, procedures, and safety expectations that support a safe and compliant work environment.

MCTS Human Resources Department provides all new employees with initial training during orientation, which includes Substance Abuse Policy, Anti-Harassment Policy, social media Policy, and Electronics Policy.

Following orientation, employees receive department-specific safety training conducted by their direct supervisors. This includes instructions on:

- **Office and workplace safety protocols**
- **Emergency procedures**
- **Hazard identification and safety reporting processes**

MCTS's safety training program applies to all operations transit workers, maintenance transit workers, and transit workers directly responsible for safety. This ensures that employees in critical operational roles receive appropriate safety instruction aligned with their responsibilities and job functions. The Transportation and Maintenance departments train their safety-sensitive employees in the following areas:

Transportation - Bus Operators

MCTS Bus Operators are the face of the company with which the community sees 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 a 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**
 - Explaining 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**

- o Provides customer service skills training and role playing
- **Passenger Interaction Skills/De-Escalation Training**
 - o Provides information passenger/ operator stressors, verbal defense and de-escalation skills.
- **Other Bus Equipment Training (Farebox, Clever Device, DCM, ADA Securement Devices)**
 - o Includes essential skill training for each type of equipment.
- **Accident Prevention**
 - o 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**
 - o 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**
 - o In compliance with Entry Level Driver Training requirement effective February 7, 2022.
 - o 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**
 - o This includes a demonstration and practice of all defensive driving skills as identified in the classroom segments, including the LLLC methods.
- **Seat/Mirror adjustments**
 - o These critical adjustments are demonstrated and practiced throughout training including the importance of doing before the bus is moved.
- **Right & Left turns**
 - o Shows students the proper way to set up a turn-on approach, how 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**
 - o 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**
 - o This provides demonstrations and practice on how to approach a bus stop, when to pull- in, what to do if the bus stop is blocked, where to safely alight passengers, when to pull out of the bus stop and how to merge safely back into traffic.
- **ADA Securement Device Practice**
 - o Provides hands-on practice of securing a variety of types of mobility devices that they may encounter.
- **Safety in the garages and yard**
 - o Shows how to properly enter and drive through garages, yard speed and pull over pits in the garage.
- **Route training & familiarization**
 - o 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**
 - o 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 are 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**
 - o Dispatcher's priority is summoning assistance for the injured. The Route Supervisor assesses the scene and determines what caused the accident. Gathers pertinent information and writes a detailed report.
- **Post-accident, random and reasonable suspicion drug and alcohol testing**
 - o 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**
 - o 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**
 - o Route Supervisor establishes detours based on what is safe and convenient.
- **Weapons protocol**
 - o Dispatch will immediately order the bus out of an area that is affected by off-board weapons threats and subsequent detour buses away from the area. On board weapons incidents require 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**
 - o Public Safety Officers/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**
 - o Public Safety Officers and third-party Transit Security Officers receive comprehensive training in de-escalation techniques.

- o National Transit Institute Assault Awareness and Prevention for Transit Operators
- **Incident command**
 - o 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**
 - o Trouble shooting is done to ensure safe operation and to protect equipment. Extensive training assists the 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)**
 - o Route Supervisors are required to use safety equipment and are provided with proper training on their use.
- **Operator safety-checks**
 - o 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**
 - o 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**
 - o An injured operator requiring immediate medical attention will have EMTs sent to them by dispatch. Operators 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**
 - o 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 well as 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**
 - o Monthly Safety Training Meetings that include eight (8) Safety and OSHA topics
- **Shop safety**
 - o Monthly Safety Training Meetings
- **OSHA standards**
 - o 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**
 - o Provided by the Transportation Department
- **Vehicle maintenance**
 - o Minimum 3-month initial training, Ongoing Training, Vendor Training
- **Lock out - Tag out**
 - o As required every year for Authorized, and effected employee - Month of August
- **Material Safety Data Sheets**
 - o GHS Training, initially and every year April
- **Proper Protective Equipment (PPE) usage and regulations**
 - o Initially upon New Hire Orientations-Supervisor Monitored. All PPE is provided to all maintenance employees at no cost to them.
- **Disposal of contaminated materials**
 - o 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.)**
 - o 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**
 - o National Transit Institute Assault Awareness and Prevention for Transit Operators

(See Appendix C for Paratransit Provider, Transdev Agency Safety Plan)

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 because of an improved safety culture
- Provides safe and reliable public transportation to the community
- Provide positive image and maintain public trust

MCTS is committed to fostering a proactive safety culture through ongoing communication,

recognition, and transparency. Safety and safety awareness information is regularly shared with all employees to ensure organizational alignment and reinforce individual responsibility for maintaining a safe work environment.

A member of the Safety Department follows up directly with any employee who self-identifies when reporting a safety hazard to inform them of the actions taken in response to their report. This personal feedback loop reinforces trust in the system and encourages continued participation in safety reporting.

Each MCTS facility is equipped with a designated Safety Board, which displays:

- The MCTS Safety Policy
- The updated Risk Register
- Promotional and educational materials on relevant safety topics

In addition, the results of Safety Committee activities, including updates on safety performance, changes to procedures, new risk mitigations, and outcomes of hazard investigations, are conveyed to employees through a variety of internal communication channels, such as:

- Transportation bulletins
- Safety board postings
- Company email notifications
- MCTS TV broadcasts
- “Inside MCTS” employee newsletters

Examples of Safety Recognition and Communication Activities

- Monthly safety training events at each station
- Monthly Reconnect Classes for Operators
- Operator service awards recognizing long-term commitment
- Safety patches awarded for consecutive years of safe driving
- Safety messages sent via operator data terminals
- Safety incentive programs to reward exemplary behavior
- Commendations for safe driving, based on incident-free performance
- Transportation bulletins highlighting new procedures, safety alerts, or identified hazards
- Training Supervisors assigned to each station to provide on-the-spot coaching and guidance
- Refresher training provided as needed based on performance or policy changes
- Postings of critical safety messages and policy updates at all work locations
- MCTS TV used to deliver video updates on safety campaigns, training highlights, and committee initiatives
- Company-wide emails with urgent or high-priority safety communications
- “Inside MCTS” newsletters featuring success stories, committee updates, and upcoming safety initiatives
- Safety Awareness week to elevate the safety culture of MCTS.
- Fatigue Policy aligned with fatigue awareness week established.

13. Additional Information

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 on 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

Definitions of Special Terms Used in the Safety Plan

Fatalities: total number of reportable fatalities & 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: 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: A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time required by the Federal Transit Administration (FTA).

Safety Performance Measure: 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: 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: An adequately trained individual who has responsibility for safety and reports directly to MCTS' general manager.

Hazard: 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: 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: 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: The composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation: A method or methods to eliminate or reduce the effects of hazards.

Safety Assurance: 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: A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety

Safety Management System (SMS): 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: 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: 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: 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.

14. 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

Recordkeeping

MCTS will retain, in original or digital form, all documents that:

- **Set forth the ASP** – the approved plan and any formally issued revisions.
- **Demonstrate SMS implementation** – procedures, work instructions, training materials, meeting minutes, audit reports, and corrective-action plans.
- **Capture SMS results** – safety-performance data, risk assessments, safety-assurance findings, investigation reports, and Safety Committee decisions.
- **Are incorporated in whole or by reference** – policies, programs, and procedures used to execute any portion of the ASP.

Recordkeeping Process

- **Create & File-** Documents are saved to a secure network repository
- **Review and Approval-** Records tied to ASP updates or SMS activities are routed through the Safety Committee (or designated approver) for quality and compliance checks.
- **Storage & Security-** All files reside on an access-controlled server with nightly backups and disaster-recovery protocols.

Retention Period

- **Minimum Retention** – MCTS will keep all ASP-related records for at least three (3) years after the date of creation.
- **Longer Retention** – Records tied to open investigations, legal holds, or grant requirements will be preserved until formally released.

(See Appendix D for MCTS and PTASP Documentation and Recordkeeping)

Compliance Statement:

Upon request, MCTS will promptly provide any ASP-related record to the Federal Transit Administration (FTA), other authorized Federal entities, or the State oversight agency. Records will be furnished in the requested format (electronic or hard copy) within the timeframe specified by the requesting authority.

Public Access

While some safety documents contain sensitive or security-related information, MCTS is committed to transparency. Public records requests will be processed in accordance with applicable open-records laws, with redactions applied only where required to protect personal privacy, security-sensitive data, or other exempted information.

Appendices

Appendix A: Substance Abuse Policy

This appendix incorporates by reference the most recent **MCTS Substance Abuse Policy Revision** (effective September 2025)

- This policy outlines procedures for pre-employment, random, reasonable suspicion, post-accident, return-to-duty, and follow-up drug and alcohol testing. The policy also includes provisions for employee education, access to substance abuse treatment resources, and clear disciplinary actions for policy violations.
 - A copy of this policy is retained on file with the MCTS Human Resources Department and is available upon request.
 - Any future revisions to this policy will be reviewed during MCTS's annual Policy update cycle.
-

Appendix B: Drug & Alcohol Testing Form

This appendix documents the **Post-Accident or Reasonable Suspicion Drug & Alcohol Testing Form**

- This form is used by Supervisors to document and initiate drug and alcohol testing following a qualifying accident or when there is reasonable suspicion that an employee is under the influence while on duty.
 - This form is retained on file and available upon request.
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Appendix C: Subcontractor Safety Plan

This appendix incorporates by reference the most recent **2025 Transdev Agency Safety Plan** (effective September 4, 2025)

- This plan outlines the subcontractor's safety management framework, hazard identification procedures, and risk mitigation processes.
 - It has been reviewed and approved by the MCTS Safety Committee to ensure alignment with the MCTS Public Transportation Agency Safety Plan (PTASP) requirements.
 - A copy of the subcontractor's Safety Plan is retained on file with the MCTS Safety Department and is available upon request.
 - Any future revisions to the subcontractor's Safety Plan will be reviewed during MCTS's annual Safety Plan update cycle.
-

Appendix D: MCTS and PTASP Documentation and Recordkeeping

This appendix documents the **MCTS and PTASP Documentation and Recordkeeping** adopted since the last version of the Agency Safety Plan was executed.

- This policy outlines the retention periods and storage requirements for safety-related documentation (including all documents that set forth the ASP, demonstrate SMS implementation, capture SMS results and are incorporated in whole or by reference).
- A copy of this policy is retained on file with the MCTS Safety Department and is available upon request