REQUEST FOR BOARD ACTION
HENDERSON COUNTY
BOARD OF COMMISSIONERS

MEETING DATE: November 2, 2020

SUBJECT: Public Transportation Agency Safety Plan (PTASP)

PRESENTERS: Autumn Radcliff, Planning Director

ATTACHMENTS: 1. Apple Country Public Transit Safety Plan

SUMMARY OF REQUEST:

This Public Transportation Agency Safety Plan (PTASP) describes the policies, procedures, and requirements to be followed by management and operations personnel to provide a safe environment for employees, customers, and the general public. The goal of this program is to eliminate the human and fiscal cost of avoidable personal injury and vehicle accidents.

As a recipient of federal grant funding, this plan is required for Apple Country Public Transit by the Federal Transit Administration (FTA). Once the plan is approved by the Board, it will be integrated into the North Carolina Department of Transportation's PTASP. Apple Country will review the plan annually and if any edits are required, the plan will be re-approved by the Board.

BOARD ACTION REQUESTED:
Formal action by the Board of Commissioners is necessary to accept the Public Transportation Agency Safety Plan (PTASP) as required by the Federal Transit Administration.

> **Suggested Motion:**
> *I move that the Board of Commissioners approve Apple Country Public Transit's PTASP.*

Public Transportation Agency Safety Plan

Apple Country Public Transit

June 2020

DRAFT

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Section 1. Transit Agency Information

General Information

Apple Country Public Transit

Accountable Executive: Janna Peterson

Chief Safety Officer: Jeff Roper

100 N. King St. Hendersonville, NC 28792
(828) 697-4819
www.applecountrytransit.com

Modes of Service: Motor-bus (fixed-route transit) and demand response (paratransit)

FTA Funding Sources: FTA Section 5307

Modes of Service Directly Provided:

☒Bus (MB)   ☐Bus Rapid Transit (RB)   ☐Publico (PB)

☒Demand Response (DR)   ☐Commuter Bus (CB)   ☐Trolleybus (TB)

☐Demand Response Taxi (DT)   ☐Jitney (JT)   ☐Vanpool (VP)

☒[TS] does not provide transit services on behalf of another transit agency or entity.

☐[TS] provides the below transit modes on behalf of the following transit agency(s) or entity(s).

Transit Agency: _____

☐Bus (MB)   ☐Bus Rapid Transit (RB)   ☐Publico (PB)

☐Demand Response (DR)   ☐Commuter Bus (CB)   ☐Trolleybus (TB)

☐Demand Response Taxi (DT)   ☐Jitney (JT)   ☐Vanpool (VP)

Brief description of services provided on behalf of the above agency.

Henderson County as Apple Country Public Transit provides both fixed-route transit and paratransit services. Service runs throughout the City of Hendersonville, Town of Fletcher and Laurel Park with three (3) bus routes running from 6:30 a.m. - 6:30 p.m., Monday through Friday (exceptions include holidays and severe weather) on a 1 hour cycle. The County contracts out the operation and maintenance of the system. The FY20 – FY22 contract provider is Western Carolina Community Action (WCCA).

The Agency Safety Plan addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.

Section 2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Henderson County DBA Apple Country Public Transit	

Signature by the Accountable Executive	**Signature of Accountable Executive**	**Date of Signature**

Approval by the Board of Directors or an Equivalent Authority	**Name of Individual/Entity That Approved This Plan**	**Date of Approval**
	Henderson County Board of Commissioners	
	Relevant Documentation (title and location)	

Certification of Compliance	**Name of Individual/Entity That Certified This Plan**	**Date of Certification**
	Relevant Documentation (title and location)	

Version Number and Updates

Record the complete history of successive versions of this plan.

Version Number	Section/Pages Affected	Reason for Change	Date Issued

Annual Review and Update of the Public Transportation Agency Safety Plan

At the end of each fiscal year, an annual review and update of the Public Transportation Agency Safety Plan is conducted by both the Accountable Executive and the Chief Safety Officer.

An assessment of the safety standards is conducted annually and if any standards are deemed subpar, the PTASP is updated and subsequently adopted. If the current version of the plan is working well, no changes will be made.

Section 3. Safety Performance Targets

Safety Performance Targets

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

Mode of Transit Service	Fatalities	Fatalities (per 100k VRM)	Injuries	Injuries (per 100k VRM)	Safety Events	Safety Events (per 100k VRM)	System Reliability
Fixed Route Bus	0	0	1	.59	1	.59	6,000
Demand Response	0	0	1	10	1	10	10,000

The following performance measures are based on the fiscal year, July 1 through June 31, to coincide with the FTA's National Transit Database reporting.

Performance Measures:

♦ SAFETY PERFORMANCE MEASURE: FATALITIES (total number of reportable fatalities and rate per total vehicle revenue miles by mode)
  o Customers, employees and the public
    ▪ 0 MB & 0 DR – Fatalities by mode
    ▪ 170,500 MB & 10,000 DR – Estimated revenue miles by mode
♦ SAFETY PERFORMANCE MEASURE: INJURIES (total number of reportable injuries and rate per total vehicle revenue miles by mode)
  o Customers, employees and the public
    ▪ 1 MB & 1 DR – Accidents with injuries by mode
    ▪ 170,500 MB & 10,000 DR – Estimated revenue miles by mode
♦ SAFETY PERFORMANCE MEASURE: SAFETY EVENTS (total number of reportable events and rate per total vehicle revenue miles by mode)
  o Combined above with reportable incidents for customers, employees and the public
    ▪ 1 MB & 1 DR – Accidents with injuries by mode
    ▪ 170,500 MB & 10,000 DR – Estimated revenue miles by mode
    ▪ ACPT defines a "safety incident" as collisions, fires, acts of God, hazardous material spills, or security events. An "other incident" is an incident that cannot be defined as a safety incident and meets the criteria for a reportable incident according to NTD. (Note: ACPT is considered a reduced reporter for NTD and does not actually report any safety events or injuries)
♦ SAFETY PERFORMANCE MEASURE: SYSTEM RELIABILITY (mean distance between major mechanical failures by mode)
  o Apple Country Public Transit fixed-route vehicles were put online in 2013 and paratransit vehicle in 2015. All buses and the paratransit vehicle have surpassed their useful lifetimes. Repairs are often needed on the buses due to their "self-lowering"

floors. The hydraulic fails because of the bus's weight from the CNG tanks. This bus model is no longer produced due to the common issue. Rarely does the issue present a safety problem for the riders. When a bus is taken offline, a replacement vehicle is readily available to continue the service.

- o *Relationship with TAM Plan – State of Good Repair (SGR) by mode*
    - To increase System Reliability, ACPT already tracks the number of days that a revenue service vehicle is offline. Tracking this data is helpful to explain budgeting for maintenance and new vehicles. A purchase order for a replacement fleet was completed on May 22, 2020. The buses are expected to arrive in spring of 2021.
    - In FY 2019, there were 32 major mechanical failures for fixed-route vehicles and 0 for the paratransit vehicle.
    - Major Mechanical Failure - A failure of some mechanical element of the revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns.

Safety Performance Target Coordination		
Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.		
Apple Country Public Transit shares safety performance targets with the French Broad River Metropolitan Planning Organization (FBRMPO) annually as part of our continued coordination of transit data. This data also includes Transit Asset Management Plan updates and anticipated capital replacement schedules.		

Targets Transmitted to the State	**State Entity Name**	**Date Targets Transmitted**
	North Carolina Department of Transportation Public Transit Division (NCDOT PTD)	

Targets Transmitted to the Metropolitan Planning Organization(s)	**Metropolitan Planning Organization Name**	**Date Targets Transmitted**
	French Broad River Metropolitan Planning Organization (FBRMPO)	

Section 4. Safety Management Policy

Safety Management Policy Statement

Henderson County, as Apple Country Public Transit (ACPT), strives to provide safe, reliable, comfortable, and innovative transportation options to every member of the community. The system is operated by a contract provider, Western Carolina Community Action (WCCA). The Public Transportation Agency Safety Plan (PTASP) has been developed to integrate safety into all system operations and it is the responsibility of the contract provider, WCCA, to implement all policies and procedures. By using the procedures contained in the PTASP, WCCA can continue to improve the safety and security of its operation and services.

This PTASP describes the policies, procedures, and requirements to be followed by management and operations personnel to provide a safe environment for employees, customers, and the general public. The goal of this program is to eliminate the human and fiscal cost of avoidable personal injury and vehicle accidents.

Each department has a responsibility under the PTASP. The Director and supervisors shall provide the continuing support necessary to achieve the PTASP objectives. A key to the success of this effort is for employees to be aware that they are accountable for safely performing the requirements of their position. The success of the program also depends on all employees actively identifying potential hazards and making a commitment to the safety of others.

Western Carolina Community Action must be aware that decisions and actions often affect the safety of those in other operations. By following the processes described in the PTASP, WCCA will continue to improve performance and the safety of the system while creating a culture of safety.

Apple Country Public Transit's and WCCA's commitment is to:

- **Support** the management of safety through the provision of appropriate resources that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;

- **Integrate** the management of safety among the primary responsibilities of all managers and employees;

- **Clearly define** for all staff, managers, and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of ACPT's safety management system;

- **Establish and operate** hazard identification and analysis, and safety risk evaluation activities--including an employee safety reporting program as a fundamental source for safety concerns and hazard identification--to eliminate or mitigate the safety risks of the consequences of hazards resulting from ACPT operations or activities to a point which is consistent with an acceptable level of safety performance;

- **Ensure** that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;

- **Comply** with, and wherever possible exceed, legislative and regulatory requirements and standards;

- **Ensure** that sufficient skilled and trained human resources are available to implement safety management processes;

- **Ensure** that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills;

- **Establish and measure** safety performance against realistic and data-driven safety performance indicators and safety performance targets;

- **Continually improve** safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and

- **Ensure** externally supplied systems and services to support operations are delivered, meeting established safety performance standards.

Apple Country Public Transit's and WCCA's Goals for Safety are established as follows:

- In collaboration with the Asheville UZA participants, design, construct, test, and operate a transportation system that achieves an optimum level of safety, exceeding the safety performance of other transit systems of a similar size in the United States.

- Identify and evaluate, then eliminate or control hazards to employees, customers, and the public.

- Meet or exceed all government and industry occupational health and safety standards and practices.

- Maximize the safety of future operations by affecting the design and procurement processes.

The objectives of the PTASP are the means to achieving its goals. They also provide a method of evaluating the effectiveness of Apple Country Public Transit's safety efforts. The PTASP objectives are:

- Integrate safety management and hazard control practices within each WCCA department.

- Assign responsibilities for developing, updating, complying with, and enforcing safety policies, procedures, and requirements.

- Verify compliance with ACPT safety policies, procedures, and requirements through performance evaluations, accident/incident trends, and internal audits.

- Investigate all accidents/incidents, including identifying and documenting the causes for the purpose of implementing corrective action to prevent a recurrence.

- Increase investigation and systematic documentation of near misses.

- Identify, analyze and resolve safety hazards in a timely manner.

- Minimize system modifications during the operational phase by establishing and utilizing safety controls at system design and procurement phases.

- Ensure that system modifications do not create new hazards.

- Train employees and supervisors on the safety components of their job functions.

Apple Country Public Transit and Western Carolina Community Action takes these commitments seriously as the lives of its riders, employees and the general public depend on the system's ability to operate in a culture of safety.

_____
Accountable Executive

_____
Date

Safety Management Policy Communication

Apple Country Public Transit realizes the importance of ensuring its employees and riders are aware of its safety management policies and procedures to effectively manage the system's day to day operations. To do this, ACPT relies on several forms of effective communication.

Employees: ACPT is constantly evaluating existing policies and procedures to verify their effectiveness. To do this, WCCA seeks input from all County staff and WCCA staff, to determine if change is necessary based on trends, data analysis, operational changes or new assets. Several methods are used to communicate policy and/or procedure changes, including:

♦ Employee memorandum through paycheck, daily manifest of work orders, agency meetings
♦ Bulletin board notices
♦ Employee email notification
♦ Departmental meetings

Apple Country Public Transit includes a training element for safety management policies impacting safety or service delivery and is conducted before the policy effective date. New policies and procedures are incorporated into orientation training for new employees as well.

Depending on the importance of the policy or procedure change, an acknowledgement signature is required of each employee verifying their understanding of the change.

Riders: If a rider policy is changed or added, ACPT notifies riders through the following methods:

♦ Notice posted on vehicle and facilities and the website including effective date and who to contact for more information
♦ Any services impacted by policies changes will include outreach as required by Federal Guidance
♦ Changes to digital rider guidance including schedules and ride guides as appropriate

Authorities, Accountabilities, and Responsibilities

As mentioned in the Safety Policy Statement, the ultimate authority for the success of this PTASP falls to the Accountable Executive (AE). The Chief Safety Officer (CSO), the administration and management team, as well as employees fulfilling their commitment to safety on a day-to-day basis support the AE.

Accountable Executive (AE): The Accountable Executive will determine, based on feedback from senior staff, the level of Safety Management System principals to maintain to ensure a safe work environment, rider experience and community safety. ACPT's AE is committed to providing employees with the tools and training needed to be successful and safe in their roles with ACPT. The AE will continually strive to create a culture of safety among the employees, and ACPT expects each employee to play a role in maintaining a safe workplace.

Apple Country Public Transit's AE is accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's public transportation system. The AE is accountable for ensuring

action is taken, as necessary, to address substandard performance in the agency's SMS. She may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the AE.

The current AE, Janna Peterson is ultimately responsible for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; carrying out the agency's Transit Asset Management Plan; and controlling or directing the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. § 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. § 5326.

Chief Safety Officer (CSO): ACPT has concluded one CSO will be sufficient to manage the day to day adherence to this Plan and, while in this role, report directly to the AE. As CSO, Jeff Roper will monitor safety and security throughout the organization including sub-contractors. All departments have been notified of the CSO's role and the established reporting requirements relating to safety-related matters. The CSO has been adequately trained for this role and has the authority and responsibility for day-to-day implementation and operation of ACPT's SMS. Along with CSO responsibilities, the CSO is also the Transportation Director for WCCA.

ACPT's CSO will be responsible for the following:

♦ Developing and maintaining SMS documentation;
♦ Directing hazard identification and safety risk assessment;
♦ Monitoring safety risk mitigation activities;
♦ Providing periodic reports on safety performance;
♦ Briefing the Accountable Executive and Board of Directors on SMS implementation progress; and
♦ Planning safety management training.

Roll of Staff to Develop and Manage Safety Management Systems (SMS)

Accountable Executive

The Accountable Executive (AE) will work with the Chief Safety Officer (CSO) and Administrative staff to adjust the PTASP as needed based on staff feedback, trends, and data analysis. The AE is vested with the primary responsibility for the activities of the transit system and overall safety performance. The AE fulfills these responsibilities by providing the resources necessary to achieve PTASP goals and objectives by exercising the approval authority for system modifications as warranted. The AE also sets the agenda and facilitates the cooperative decision making of the management team.

Chief Safety Officer (CSO)

For purposes of managing the SMS and PTASP, the CSO will report directly to the AE to determine strategy, policy, and goals for maintaining safety and security for passengers, employees, and the general public. The CSO will monitor day to day operations and work with staff to identify and mitigate risk through evaluation, feedback, and data analysis.

Supervisors

Supervisors are responsible for the safety performance of all personnel and equipment under their supervision. They are responsible for the initial investigation of all accidents and incidents, and for reporting these accidents and incidents to the Human Resources, Risk Management and Transportation Operations Department.

Employees

All WCCA personnel are responsible for performing their work safely and for following established safety-related rules, procedures, and work practices. This includes reporting all accidents, incidents, and hazards to their supervisor per established requirements for the protection of themselves, co-workers, customers, facilities, and equipment.

Key Staff

Western Carolina Community Action staff will be responsible for maintaining high standards of safety, customer service, and security. The Employee Safety Reporting Program (ESRP) will define the employees' role to identify and mitigate risk through open communication to superiors including the CSO and AE. Administrative staff will be instrumental in ensuring action is taken to reduce risk and the whole system is continuously monitored to ensure actions are effective and appropriate.

WCCA staff will be involved with updates, modifications and implementation of the PTASP. Each staff member brings a valued perspective to the development of policies and procedures he or she will be expected to implement. Every opportunity will be given for employees and riders to provide input to increasing safety at WCCA. Those opportunities include monthly safety meetings, annual employee meetings and training, department meetings, and an open-door policy with access to all management staff.

Employee Safety Reporting Program (ESRP)

As stated in the [Safety Management Policy Statement](#), Apple Country Public Transit is determined to provide a safe working environment for WCCA employees, its riders and the general public. To ensure success, ACPT has developed an ESRP to enable employees to report any risk or perceived risk to a supervisor, CSO, or member of administration.

The ESRP allows each employee to report detailed information and observations whether they are a driver in service, maintenance staff, or other on-duty employee. This program dovetails with other methods currently in place to proactively identify hazards or threats. Those methods include but are not limited to the following:

- Pre/Post Trip Inspections
- Preventive Maintenance Inspections
- Employee Evaluations
- Service Evaluation and Planning Program
- Training Program
- Rider and Public Complaint/Compliment Process
- Safety and Employee Meetings
- Incident/Accident Policies
- Safety Committee

Hazard Reporting Process

ACPT has developed a Hazard Report Form used to identify and provide information about hazards observed by employees while on-duty. The three-page form identifies vital information to assist employees in determining an action to mitigate the threat or hazard. This form is not meant to replace accident forms currently being used, but instead used in conjunction with the accident forms. It is proactive reporting method to identify a perceived threat or hazard, potentially endangering employees, riders or the general public. The form serves a dual role as an incident, illness, and near miss report. The form is located in Appendix 1 of this Plan.

Effective September 1, 2020 all WCCA employees will receive training on the procedures associated with the Hazard Report Form. The training will cover the following areas:

- ♦ Locations of blank Hazard Report Form
- ♦ When to use a Hazard Report Form
- ♦ Capturing critical information on the form
- ♦ Notification process depending on the hazard
- ♦ Proper assessment of the reported hazard
- ♦ Levels of likelihood of repeat
- ♦ Supervisor and CSO role in completing the form
- ♦ Follow-up process to determine effectiveness of mitigation

The following process is used as part of the ESRP.

Immediate Action Required

If you have identified a hazard which you perceive to be a risk to yourself, fellow employees, passengers, or the public you must report it immediately to the on-duty supervisor/dispatcher. Once reported you must determine if immediate action is necessary to prevent additional risk. If so, communicate to supervisor before taking action if time allows. Once action has been taken to mitigate the potential harm to yourself, others or property advise a supervisor of the results of your actions. Once you are able, complete the Loss Prevention Investigation Report with complete information and give to supervisor on-duty.

Delayed Action Required

Once a hazard has been identified, the employee should assess if the hazard requires immediate action to reduce the risk of if delayed action can be taken. If the employee determines delayed action is appropriate a full report must be completed using the Loss Prevention Investigation Report and submitted to the on-duty supervisor.

Role of Supervisor

The on-duty supervisor is responsible for advising the employee on immediate action or delayed action to mitigate a hazard. The supervisor must then review the Loss Prevention Investigation Report to ensure all information is included adding additional information from their perspective. Once the form is complete it must be reviewed by the CSO to determine action necessary, investigate root cause of hazard and follow-up.

The CSO is responsible for determining the status of each hazard reported. In some cases, hazards may be identified and are not able to be resolved but actions are taken to reduce the risk of the hazard. It is ACPT's goal to eliminate all identified hazards if possible. Some hazards may require continuous monitoring to ensure the hazard does not elevate to an action level.
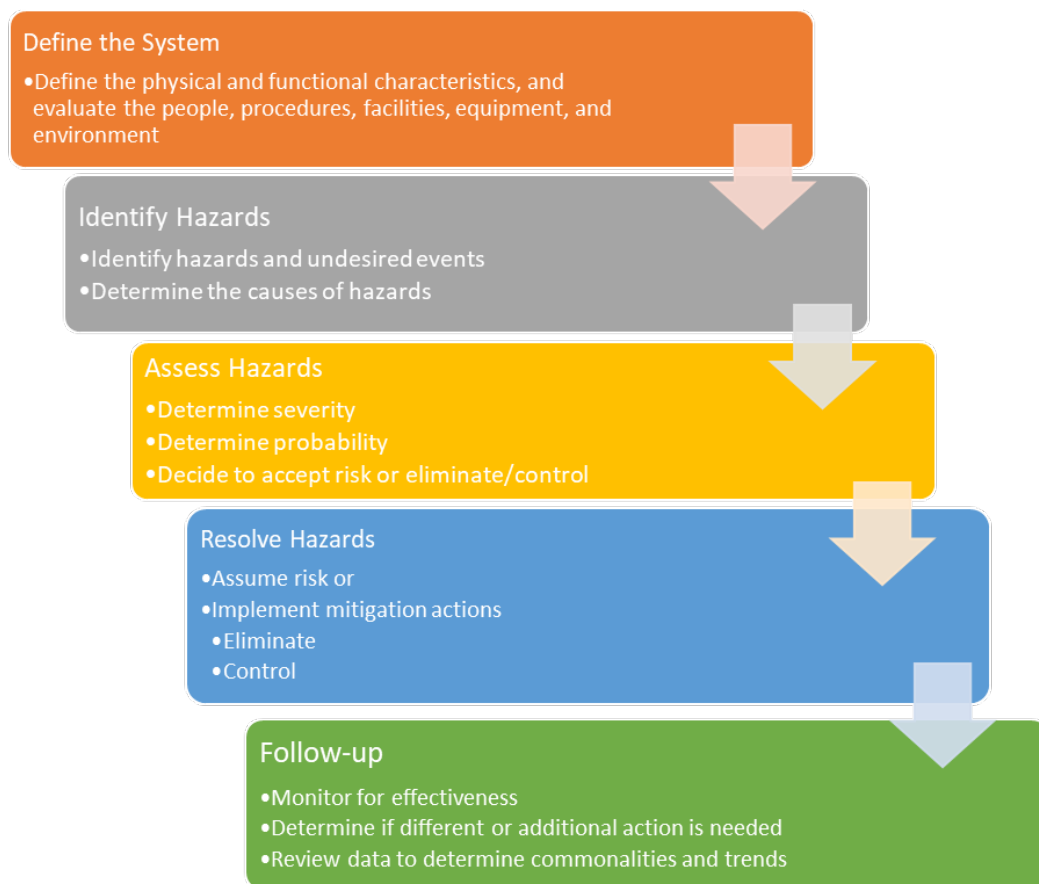
All hazard reports will be documented and integrated into current performance measures and data collection. The CSO will track each hazard to completion and recommend policy or procedural changes if needed as a result of the hazard mitigation.

Apple Country Public Transit's and WCCA's Responsibility

ACPT takes every hazard report seriously and WCCA investigates each one to determine if it's an isolated case, or emerging trend requiring evaluation of policies and procedures or service modifications. Employees reporting hazards will not face disciplinary action unless that employee contributed to the hazard. ACPT wants to encourage all WCCA employees to report any hazard or threat they observe and help make the system as safe as possible for its employees, riders, and the general public. Employees may report the hazard to their immediate supervisor or go directly to the CSO to submit and discuss their report.

The following process chart illustrates the steps taken as part of the hazard identification process through the ESRP.

Define the System
- Define the physical and functional characteristics, and evaluate the people, procedures, facilities, equipment, and environment

Identify Hazards
- Identify hazards and undesired events
- Determine the causes of hazards

Assess Hazards
- Determine severity
- Determine probability
- Decide to accept risk or eliminate/control

Resolve Hazards
- Assume risk or
- Implement mitigation actions
  - Eliminate
  - Control

Follow-up
- Monitor for effectiveness
- Determine if different or additional action is needed
- Review data to determine commonalities and trends

Section 5. Safety Risk Management

Western Carolina Community Action provides training to all personnel in the identification of hazards and security threat while also providing tools to enable personnel to report these risks. Once the risk has been identified, WCCA assesses the risk to determine the necessary response and response time. The response may include further investigation or monitoring, action(s) to mitigate the hazard or security threat and follow-up assessment to ensure action taken is appropriate and effective.

Safety Hazard Identification:

Hazard and security threats are identified through different methods of monitoring the system. This includes system, employee and asset assessments conducted daily and on incremental basis. Additionally, Apple Country Public Transit communicates with peers across the state, FTA and NCDOT to identify common hazards impacting multiple systems. WCCA conducts the following routine and random evaluations of the system in the following departments:

Personnel

Each employee is evaluated annually to ensure they are performing their job to the expectations of the Agency. As part of their orientation process the employee is provided training and tools to perform their job while not receiving permanent status until completing 90 days of employment. During the 90-day period, the employee is evaluated to determine if they are properly prepared to perform their job.

Additional evaluations of the employee are conducted throughout the year through spot-checks of some aspect of their job function. Video monitoring and complaint-based evaluations are also performed. If through spot-check or annual evaluation it is determined the employee's performance does not meet expectations or training standards, remedial training will be provided, and additional evaluations will take place to ensure remedial training was effective.

Assets

ACPT via WCCA contracts out maintenance of all service vehicles. Rolling stock are monitored through a vigorous preventive maintenance plan aimed at identifying hazards and deficiencies as part of daily and scheduled inspections. Operators perform daily Vehicle Inspection Reports (VIR)s and incremental (every 15,000 miles) and annual inspections are performed by the contracted maintenance provider.

ACPT updates the FTA required Transit Asset Management (TAM) Plan annually with data relevant to each asset to include a condition assessment, miles (with rolling stock and non-revenue vehicles) and age as to whether the asset is in a State of Good Repair (SGR). The TAM Plan allows management to plan asset replacement or rehabilitation for future years.

System

As part of WCCA's safety management system monitoring, the agency uses service evaluations when planning, spot-checking or responding to an event like an accident or incident. New routes are strategically developed with safety being the first priority and passenger access second. ACPT route planners plan and test all routes before activating the route for revenue service. All routes are reviewed periodically to determine if environmental hazards may exist requiring modification to the route, schedule or vehicle.

All front-line staff have been trained to note any changes to service which may be considered a hazard or security threat and through the ESRP, notify their supervisors immediately or upon return to WCCA depending on the severity of the hazard.

Hazard Identification Procedure

Any employee seeing something through inspection or observation they deem to be a hazard are instructed to immediately report that hazard to the immediate supervisor regardless of the perceived level of threat. Depending on the situation, either the immediate supervisor or the employee will complete a Hazard Report Form and submit it to the CSO.

If the hazard requires immediate mitigation, the employee will be instructed on steps to take to reduce the risk which may or may not alleviate the risk completely. Additional actions may be taken once the immediate risk mitigation has been taken. Some hazards may not pose an immediate risk but are still reported and the CSO will be responsible for risk assessment, investigation and mitigation strategy.

In some cases, a passenger or member of the general public may call with a complaint about a front-line employee which may rise to the level of hazardous behavior or actions. WCCA and ACPT currently documents all customer complaints/compliments and takes appropriate action to investigate any complaints. Complaints deemed hazardous will trigger immediate action by on-duty supervisors.

Hazard Report Forms will be located on all vehicles along with standard safety kits for accident and incident reporting, with all Customer Service Representatives (CSR)'s, Dispatch, Operations, and Maintenance Departments. A copy of the form is located in Appendix 1.

The Hazard Report Form will require the employee to briefly describe the hazard noting date, time of day, location, and other pertinent information. The form includes a section for the CSO or immediate supervisor to document immediate action taken to reduce risk, a risk assessment chart prioritizing the risk, and a section for additional follow-up action. All forms will be processed by the CSO and summarized periodically for trend analysis and include in safety performance measures.

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49 CFR part 673.5

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

Safety Risk Assessment

All staff have been provided with training appropriate for their positions within the organization. WCCA expects its employees to respond to hazards or threats with professional judgement as sometimes there might not be time to contact a supervisor to prevent an emergency event. In cases where the hazard can
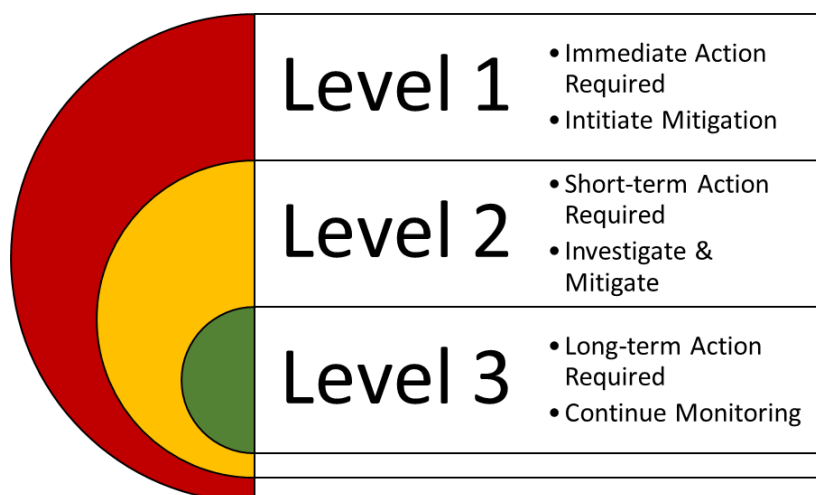
be reported without immediate risk, the employee will make an initial assessment of the risk as part of their report.

Once received by the CSO, the initial risk assessment may be amended requiring immediate, short, or long-term response.

Level 1 - Immediate: A deficiency, threat or hazard requiring immediate attention to mitigate risk either temporarily until further action can be taken or complete mitigation.

Level 2 - Short Term: Action is needed within seven days to mitigate an identified deficiency, threat or hazard. The deficiency, threat or hazard does not pose immediate danger but if no action is taken could elevate to an Immediate level risk.

Level 3 - Long Term: A deficiency, threat or hazard has been identified but does not pose a threat currently but could at a later time. Continued monitoring and awareness are required.

Level 1	• Immediate Action Required • Intitiate Mitigation
Level 2	• Short-term Action Required • Investigate & Mitigate
Level 3	• Long-term Action Required • Continue Monitoring

The CSO in coordination with staff will investigate each identified hazard, assess the risk, and take appropriate action to mitigate the risk. Additional mitigation may be needed based on follow-up monitoring to the action taken.

Safety Risk Mitigation

In response to all identified and assessed hazards, WCCA will take steps to mitigate the hazard and reduce or eliminate the risk to employees, riders, and public. Mitigation strategies will be dependent on results of investigation into the elements contributing to the risks. The investigation may include more than one department and may include interviews outside of the transit system.

Actions to mitigate risk will include all employees, riders, and public who may be impacted by either the hazard or the actions to reduce or alleviate the risk. WCCA will communicate actions to appropriate staff through methods appropriate risk assessment. In some cases, immediate communication through two-way communications (dispatch system, text burst, email, or web alert) may be necessary. In other cases, bulletin board notices or memorandum posting may be appropriate.

Once a risk mitigation strategy has been implemented WCCA will monitor the actions to determine if full mitigation is possible and if not, is additional action necessary to alleviate the risk or is stepped up monitoring necessary. Some risks may not be completely mitigated but awareness to the risk will is a top priority.

All actions taken to mitigate risk will be responsibility of the CSO, documented and linked to the initial deficiency, threat, or hazard identification step.
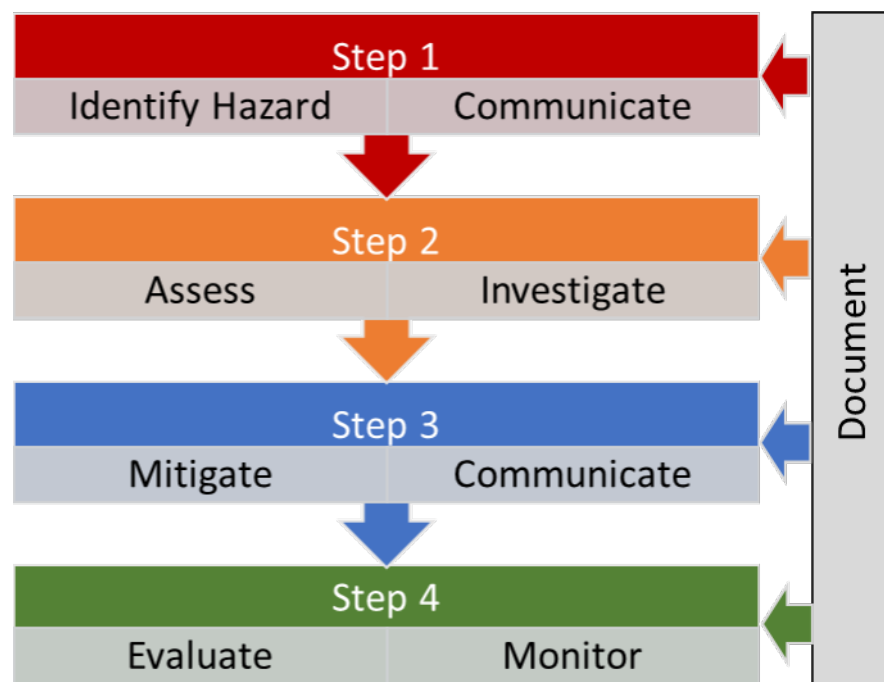
Section 6. Safety Performance Monitoring and Measurement

Safety performance monitoring and measurement involves the continual monitoring of the transit agency's activities to understand safety performance. Through these efforts, ACPT and WCCA can determine whether they are meeting their safety objectives and safety performance targets, as well as the extent to which it they are effectively implementing Safety Management Systems (SMS).

WCCA is constantly striving to maintain the highest level of safety through its monitoring methods to include adherence to policies and procedures, safety and maintenance plans, and system and employee evaluation processes. These methods allow WCCA to determine the need to make changes to improve policies, employee training and service delivery.

The CSO will monitor operations daily through observation, data analysis, communication and safety updates to identify mitigation strategies that may be ineffective. If mitigation actions are found to be ineffective additional strategies will be developed through key and impacted staff feedback.

Maintenance

Maintenance Standards and Procedures. Standards and procedures are included in the ACPT Maintenance Plan. In general, maintenance procedures are designed to ensure that the maintenance recommendations of the manufacturer are met, maximum efficiency in performance and operation is obtained, and maximum bus life and condition are maintained. Daily bus inspections, an active Preventive Maintenance Program, contractor oversight, and careful monitoring are included in procedures to ensure the safety of buses and adequacy of the Fleet Maintenance Plan.

Operator Inspections. All operators are required to perform a pre-trip and post-trip inspection to ensure that the vehicle is safe and in good operating condition. If any defects are noted by the operator, a Defect Slip is completed and, depending on the severity and extent of the defect, the vehicle may be repaired or taken out of service until a repair can be made. In the case of a defect that develops or is noted once a vehicle is in service, the operator is required to communicate the problem to Operations, who will then notify the maintenance contract provider.

Daily Servicing and Inspections. WCCA bus operators inspect and service buses used in revenue service each day. The buses are fueled, all fluids are checked, tires and lugs are checked, and the vehicle is inspected for any leaks or unusual noises. A contracted cleaning service cleans the bus interiors each day. When a defect is noted, it is reported to the Supervisor on shift so that evaluation and, if necessary, a repair can be conducted.

Mileage-Based Maintenance Inspections. All service vehicles receive preventive maintenance inspections (PMI) at designated mileage intervals. Mileages are determined by vehicle and subcomponent manufacturers and real-world experience. Oil sampling is performed during regular maintenance service for both engines and transmissions. A description of the schedule and type of inspection and service performed for each bus series is included in the ACPT Maintenance Plan.

Operations

Facility Monitoring

Formal facility inspections of all WCCA facilities and grounds are conducted by the Safety Manager quarterly based upon NCDOT recommended guidelines. The purpose of the inspections is to identify any unsafe or unhealthy conditions which may exist, and that may require maintenance or modification. Each facility is also visually inspected for compliance with OSHA and local fire codes.

Any guests to WCCA's administration facility must check in through a secured process requiring check-in and validation of visit purpose. Employees are trained on procedures for visitors in the workplace and facility access is limited through security systems.

Frequency

The Safety Committee conducts its safety inspections quarterly. Employees look for potential hazards with equipment whenever they are using that equipment. Preventive maintenance of equipment and facilities is performed in accordance with the manufacturer's recommended practice. Hazards are also identified by analyzing work accident trends, through Hazard Report Forms submitted by employees. Forms are used by employees to report safety concerns and to make safety recommendations.

Reporting

When deficiencies are noted during quarterly inspection*s*, they are documented and reported to the director of the department in which the safety hazard is located. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor or CSO. Hazard Report Forms are routed to the department, Chief Safety Officer or director best equipped to evaluate the concern and, when necessary, propose a resolution.

Hazard Resolution

The primary purpose of facility inspections and hazard reporting is to identify conditions that could lead to accidents and losses. In view of this, it is crucial that all departments and employees be involved in the Facility Inspection and the Hazard Identification and Resolution processes. Hazard resolution is related to the severity of the hazard and the probability and severity of a negative consequence of the hazard.

Follow-up

Corrective action for a confirmed hazard that has been identified by any established process is the responsibility of the director of the department area in which the hazard exists or the CSO. This includes arranging for the services of other WCCA departments or outside parties, as necessary, to eliminate or control the hazard.

Documentation

Hazards that have been identified, proposed resolutions, and corrective actions are recorded in hard copy by the Safety Committee and maintained by CSO.

All front-line personnel are responsible for monitoring safety and security as part of their respective positions. If a hazard is identified through observation or interaction with customers or the general public, it is reported to the immediate supervisor as well as following WCCAs hazard reporting process.

Employee Hazard Reporting

Loss Reports

Employees can fill out a Hazard Report Form which is turned into the effected department and the CSO, talk with a supervisor or the Operations Manager. They can also contact their supervisor. Depending on the severity/risk of the hazard identified, immediate action may be taken. Feedback will be provided to the employee on what action, if any, will be taken. All employees follow the Employee Hazard Reporting Program Policy.

Route/Operations Safety

Employees can fill out a Hazard Report Form or discuss suggestions for making the system/route safer. ACPT encourages WCCA employees to be advocates for safety while also suggesting methods of increasing performance. Management has an open-door policy and makes clear the importance of employee feedback; positive and negative.

Safety Events

Accident and Incident Reporting Process

All accidents and loss incidents are to be investigated. ACPT's safe driving standards require professional safe performance of all operators. To ensure better than average safety performance, WCCA employs the Defensive Driving, National Safety Council, and PASS System guidelines to determine if a collision or onboard incident could have been prevented. All personnel operating any ACPT vehicle are held to this standard.

The Western Carolina Community Action Operator's Manual includes procedures and responsibilities for accident/incident investigation. The combined manuals establish procedures for accident notification, response, and investigation.

Transit Operations coordinates with outside law enforcement agencies if they investigate an event. Administrative staff coordinates with outside insurance providers and ensures an independent investigation to manage liability and claims.

Most accidents and incidents are relatively minor in severity and are investigated by the supervisor and Transit Director. Since most accidents involve buses, this section focuses on bus accidents. However, all non-bus accidents and incidents are also investigated.

Notification

Bus Operators are to notify a supervisor anytime a vehicle might have been damaged, anytime an ACPT vehicle and another vehicle come into contact, or anytime an instance occurs in where a customer may have been injured. An Operations Supervisor will be directed to the scene. Police and ambulance will be dispatched, if necessary.

At-Scene Procedures

Bus Operators will adhere to the following procedures defined in the WCCA Safety Plan:

- ♦ Assist the injured.

- ♦ If blocking traffic, set out reflective triangles.

- ♦ Do not move the coach unless required to do so by an Operations Supervisor, fire or police order, or impending danger from traffic.

- ♦ Obtain names, addresses, and phone numbers of all witnesses.

- ♦ Have all customers sign the customer list.

Operations Supervisors are responsible for conducting on-scene investigations of accidents and incidents. Depending on the severity and the nature of the event, various mechanisms will be used for preserving transient evidence. These may include digital photography, bus video, field sketches, interviews, and observations.

Investigation

An attempt is made to complete the investigation of most accidents within three days. Operations Supervisors are required to complete an Accident/Incident Report. Operators are required to complete an Accident Information Report. The Supervisor is required to file both reports electronically and attach all relevant media for use by the Transportation Director and the CSO.

A Report of Injury Form must be completed if an employee suffers an injury or illness as a result of an accident or incident.

Accident Review Process

Accidents and Incidents are classified as Preventable or Non-Preventable.

Preventable accidents are defined as those accidents that could have been reasonably avoided if the operator had followed all defensive driving techniques as established by the Defensive Driving, National Safety Council, and PASS System guidelines. After reviewing all related documents and evidence, the investigating Operations Supervisor and CSO make an independent preliminary determination of whether the accident was preventable. The final accident determination is made by the Transportation Director.

Hazard Resolution

The primary purpose of the Accident Investigation process is to determine the cause(s) of accidents so that they may be prevented or mitigated in the future. To this end, it is crucial that all relevant departments be appropriately involved in the Process. A serious attempt is made to use lessons learned through the investigatory process to incorporate hazard resolutions into future procedures, designs, construction, modifications, training, and procurements.

Follow-up

Follow-up in the form of corrective actions is the responsibility of the employee's director. The responsibility may be delegated to the employee's manager, supervisor or CSO.

Any disciplinary action will be assessed using the Administrative Handbook. Disciplinary consequences for accidents may include warnings, suspensions, and discharge.

Training will be provided, in most cases, for employees who have been involved in two preventable accidents within one year. Training and re-training are not disciplinary in nature.

Internal Reporting

The Operations Supervisor is responsible for ensuring that all accident reports are completed and filed with Human Resources and the CSO. Human Resources will advise on the history of the employee if a pattern of safety events is evident.

Documentation

Transit Operations and Human Resources and CSO maintain the accident investigation documentation.

Performance Measures

Through a series of performance measures relative to operations, maintenance, and safety, ACPT can monitor the system's safety by identifying trends and gaps in policies, procedures, training, and monitoring efforts. The following performance measures are on a daily, monthly, and quarterly basis.

Maintenance *(examples)*

- **Preventive Maintenance On-time Inspection Percentage** – determines the effectiveness of the maintenance department to ensure all inspections are conducted per manufacturing and ACPT mileage intervals.

- **Vehicles Removed From Revenue Service** – tracks vehicles removed from service due to a mechanical defect developed while in service requiring immediate service either on-site of failure or once returned to the facility.

- **Annual Vehicle Condition Assessment** – through annual inspection, determines on a scale of 1-5 the overall condition of the asset. This performance measure is also used in annual updates of ACPT's Transit Asset Management Plan.

Operations

- **Customer Complaints Per Month** – tracks all customer complaints to identify areas of deficiency with vehicle, driver or other ACPT areas. Safety-related complaints are immediately routed to a supervisor on-duty or the CSO for investigation mitigation and response. Complaints may be a result of phone calls, website or [TS] public forums.

- **On-time Performance** – serves as an indicator to issues with time management, environmental factors, scheduling, and vehicle and driver performance.

Safety

♦ **Safety Performance Measure: Fatalities** (total number of reportable fatalities and rate per total vehicle revenue miles by mode)

♦ **Safety Performance Measure: Injuries** (total number of reportable injuries and rate per total vehicle revenue miles by mode)

♦ **Safety Performance Measure: Safety Events** (total number of reportable events and rate per total vehicle revenue miles by mode)

♦ **Safety Performance Measure: System Reliability** (mean distance between major mechanical failures by mode)

7. Safety Promotion

Operator Selection

Hiring Practices

Selecting applicants best suited to excel at the Bus Operator job requirements is critical to safe transit operations. The transit Bus Operator is directly responsible for the safety of not only the passengers, but also the pedestrians, bicyclists, drivers, and all others who share the road with the transit vehicle. ACPT's hiring process includes the following components:

Applications

Applicants are sought through postings in transportation listservs, JobLinks, and the WCCA website and applications filed by prospective candidates when there are no positions available. The applications are screened by key personnel in Human Resources and Transit Operations.

Interview

After application reviews, applicants are then interviewed by the Operations Supervisor, Transportation Director, and an HR or other administrative staff person. The interview process is designed to evaluate a candidate's strengths in customer service, the ability to simultaneous perform tasks, conflict resolution, and the ability to perform well under temporal and interpersonal pressure.

Driving Record

To be eligible for hire, a candidate must submit an acceptable driving tract dating back seven years. This establishes 23 years as the de facto minimum age requirement for new hire Bus Operators.

Licensing

To be eligible for hire, a candidate must be able to earn a CDL with a Passenger Endorsement.

Criminal Background Check

To be eligible for hire, a candidate must submit to a Criminal Background Check administered by the North Carolina State Police with the Federal Bureau of Investigation. The results must meet all statutory and ACPT standards for the Bus Operator position.

Drug Testing

To be eligible for hire, a candidate must produce a negative result for a pre-employment drug test.

Physical Capacities Testing

To be eligible for hire, a candidate must pass a position-specific physical capacities test.

Training

There are formal training programs for Bus Operators, Maintenance employees and Operations employees. These include training classes, manuals, ACPT Standard Operating Procedures, and on-the-job training.

The safety component of training is designed to make employees aware of the hazards associated with their jobs and the appropriate methods for controlling these hazards. The training is intended to motivate employees to work safely. Trainings fall into three main categories: (1) Initial, (2) Periodic, and (3) Remedial or Refresher.

Initial Bus Operator Training

New Bus Operators receive an intensive two week training course that covers every aspect of their new job. Some components of the training are delivered in the classroom. The majority of learning occurs on the buses during off-route and on-route training. The training includes, but is not limited to, the following areas:

- Defensive Driving

- Orientation to Bus System

- Basic Bus Maneuvers

- Advanced Bus Maneuvers

- Service Stops and Proper CNG Fueling Procedures

- System Overview

- System Procedures

- Communication skills

- Customer Service

- Accessible Service

- Emergency Management

- Fleet Services

- Personal Safety

- Health/Injury Prevention

- Stress Management

- CDL Preparation

- On-route Training

- Vehicle Orientation of all Vehicles

- SMS Training and all other manuals

On-route training provides real service experience with an Operator Instructor on the new operator's regularly scheduled work. The time the new employee operates the revenue route is increased daily. Each day the student receives a full review and debriefing from his or her instructor. Instructors communicate among one another regarding where additional training for new operators is required. Student rotation among the Operator Instructor group provides each student with experience across a variety of routes, vehicles, times of day, instructional styles, and driving conditions.

After the initial training, new Bus Operators receive additional support and training, including:

- Check-rides at the following intervals: one week, two weeks, and twelve months

- Annual Follow-up: Procedure and Policy Review

- Driving and Defensive Driving Course (DDC) (when available)

- One-Year Follow-up: Debriefing with Operations Training Supervisor and safety review with Operations Management

- Annual check-ride

- Annual Performance Evaluation

Annual Training For All Bus Operators

Every year, each Bus Operator receives one full day of refresher and topical training when available. The training addresses, but is not limited to, the following topics:

- Fatigue Awareness

- Dealing With Difficult People

- Resolving Conflict

- Harassment

- Effectively Dealing With People of Differing Ages

- Proper Securement of Mobility Devices

- Defensive Driving Course

- Bloodborne Pathogens

- Safety/Security Update

- Injury Prevention

- Accessible Service Sensitivity

- PTASP and SMS

Partial-day trainings are also scheduled on safe winter driving and whenever warranted by the addition of new equipment or a change in configuration.

Initial Operation Supervisor Training

Transit Operations Supervisors begin their career path, almost exclusively, as Bus Operators who first work in the position of Temporary Supervisor. A Temporary Supervisor performs many functions of the full supervisory position and receives training in, but not limited to, the following areas:

- Drug & Alcohol (Policy and procedures for all types of FTA-mandated testing)

- Accident Investigation (based on the TSI model)

- Emergency Procedures

- Security Procedures

- On-the-job Injury Claims

- Blood Borne Pathogens

- Data Entry and Recordkeeping

- Harassment

- Cultural Diversity

- Dispatch Operations

- Field Operations

- First Aid and Defibrillator

- Conflict Resolution

In addition to their initial training, all Transit Operations Supervisors receive refresher training and topical training annually.

Injury and Illness Prevention Training

The WCCA employees are not often in situations that present hazardous conditions, but trainings are offered to achieve a safe working environment for all employees and reduce the chance of occupational-related injuries and illnesses. Dependent upon availability, some areas addressed in training include:

- Handling Hazardous Materials (Right to Know)

- Slips, Trips, and Falls

- Personal Protection Equipment

- First Aid

- Bloodborne Pathogens

- Hazardous Materials Storage

- Strains and Sprains

- Fall Protection

- Confined Space Program

- Ergonomics

- Hazard Communication Program

Emergency Response Planning and Coordination

Details are contained in the Henderson County Emergency Action Plan and Evacuation Request Procedures. Apple Country Public Transit vehicles are on-call in a declared emergency for the Emergency Services Department of Henderson County.

System Modification Design Review and Approval

General Process

The ACPT bus system is regularly modified in response to operational experience, the addition of new types of service, and changes in service design and levels. ACPT's philosophy is to use appropriate new technologies to benefit the environment and the community it serves. The challenge is to review any proposed modification adequately before it is approved. Any proposed modification should be evaluated to ensure it is compatible with existing systems and does not introduce new hazards to the system or reduce the effectiveness of existing hazard controls.

Equipment modifications may be proposed by any employee of any department that uses the equipment. Changes may also occur from an analysis of reliability performance, historical data, and available improvements in equipment design and components.

Route modifications are designed by the County Planning Department. Planning may use a current Bus Operator to test routing and bus stop placement. This experience-based, real-world process is designed to protect the safety of the transit bus, transit passengers, other vehicles, and pedestrians.

The Planning Department informs the Operations Department of any proposed route modifications. The Planning Department can request that the Committee evaluate a specific proposal, or the Committee can choose to evaluate any proposed modifications.

Transit operations management may request a route modification it believes will improve operations. It may also choose to evaluate a modification that has been proposed by another department. Input from individual Bus Operators is encouraged through the Hazard Report Form, and direct communication.

Finally, the Planning Department maintains a cooperative working relationship with all WCCA staff, NCDOT, and municipal Public Works departments.

8. Additional Information

This PTASP was developed from information in other WCCA/ACPT documents, policies and procedures and manuals. Those documents are listed below:

- WCCA Employee Handbook
- Safety and Security Plan (SSP)
- Vehicle Maintenance Plan
- WCCA Driver Training Manual

9. Definitions of Terms Used in the Safety Plan

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

• **Accident** means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of 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.

• **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan, in accordance with 49 U.S.C. 5326.

• **Equivalent Authority** means an entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.

• **Event** means any Accident, Incident, or Occurrence.

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

• **Incident** means an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

• **Investigation** means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.

• **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.

• **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

• **Operator** of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.

• **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

• **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.

• **Public Transportation Agency Safety Plan (or Agency Safety Plan)** means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.

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

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

• **Safety Assurance** means processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

• **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

• **Safety Management System** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

• **Safety performance target** means a performance target related to safety management activities.

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

• **Safety risk assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

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

• **Serious injury** means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when 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.

• **Transit agency** means an operator of a public transportation system.

• **Transit Asset Management Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR Part 625.

10. Commonly Used Acronyms

Acronym	Word or Phrase
ACPT	Apple Country Public Transit
ADA	American's with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as a PTASP in Part 673)
CFR	Code of Federal Regulations
CT	County Transit
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
NCDOT	North Carolina Department of Transportation
MPO	Metropolitan Planning Organization
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
SSP	System Safety Plan
U.S.C.	United States Code
VRM	Vehicle Revenue Miles
WCCA	Western Carolina Community Action