



3613 LUCIUS ROAD. • COLUMBIA, SC • 29201

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Central Midlands Regional Transit Authority SERVICE COMMITTEE AGENDA

Wednesday, August 9, 2023 - 12:00 p.m.

3613 Lucius Road, Columbia, SC, 29201

Conference Room A (Large) - 2nd Floor

Prior to entering the meeting, please turn all electronic devices (cell phones, pagers, etc.) to a silent, vibrate or off position.

Lill Mood, Chair (Lexington County)

Will Brennan, (City of Columbia)

John V. Furgess, Sr. (Richland County Legislative Del.)

Tina Herbert (City of Columbia)

Carolyn Gleaton (City of Columbia)

Allison Terracio, (Richland County)

Skip Jenkins (City of Cayce)

Geraldine Robinson (Town of Eastover)

Al Koon (Town of Chapin)

1. CALL TO ORDER AND DETERMINATION OF QUORUM
2. ADOPTION OF AGENDA PAGE(S) 1
3. MIDLANDS TRANSIT RIDERS' ASSOCIATION UPDATE (Walter Durst)
4. ADOPTION OF MINUTES FROM July 12, 2023 PAGE(S) 2-7
5. DISCUSSION AND ACTION ITEMS
 - A. Passenger Amenities Program Update (Zane McGhee-Davis & Floyd) PAGE(S) 8-10
 - B. Lucius and River SuperStop Update (Eric Harris) Verbal
 - C. Transit Operations Report June 2023 (Lenny Cooksey) PAGE(S) 11-38
 - D. Ridership Analysis - June 2023 (Eric Harris) Verbal
 - E. Public Transportation Agency Safety Plan (Arlene Prince) PAGE(S) 38-113
6. ADJOURN

All items on this agenda are subject to action being taken by the Committee. Agenda order is subject to change.

GENERAL INFORMATION ABOUT BOARD COMMITTEE MEETINGS: The COMET will make all reasonable accommodations for persons with disabilities to participate in this meeting. Upon request to the Public Information Specialist and Clerk of the Board, The COMET will provide agenda materials in appropriate alternative formats, or disability-related modification or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public meetings. Requests should be sent to The COMET by mail at 3613 Lucius Road, Columbia, SC 29201, by fax at (803) 255-7113, or by e-mail to info@catchthecomet.org. For language assistance, interpreter services, please contact (803) 255-7133, 711 through the Relay Service. Para información en Español, por favor llame al (803) 255-7133.

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The COMET Service Committee Meeting minutes are prepared and presented in summary form. Audio recordings of the meetings are on file at The COMET and are part of the approved minutes. If you would like to hear the recording of the meeting, please contact Angela Jacobs at ajacobs@thecometsc.gov.

Per SC Code of Laws, Title 30, Chapter 4, Section 30-4-80 - All public bodies shall notify persons or organizations, local news media, or such other news media as may request notification of the times, dates, places, and agenda of all public meetings, whether scheduled, rescheduled, or called, and the efforts made to comply with this requirement must be noted in the minutes of the meetings. The COMET complied with the notification of this meeting on July 6, 2023

**Central Midlands Regional Transit Authority
SERVICE COMMITTEE MEETING
Wednesday, July 12, 2023-12:05 P.M.
3613 Lucius Road, Columbia, SC 29201
Conference Room A (Large) - 2nd Floor**

Members Present

Will Brennan*
John V. Furgess, Sr., Vice Chair
Carolyn Gleaton
Tina Herbert * **Joined at 12:12**
Lill Mood, Chair **Joined at 12:15**

Advisory Members Absent

Skip Jenkins
Al Koon
Geraldine Robinson

*Via phone or virtual

COMET Staff Present:

Rosalyn Andrews, Director of Finance/CFO*
Jackie Bowers, Director of Operations
LeRoy DesChamps, Interim Executive Director*
Angela Jacobs, Board Clerk & Community Programs Specialist
Michelle Ransom, Regional Grants Manager*
Arlene Prince, Director of Compliance & Civil Rights Officer
Crystal Willis, Financial Accountant*

Guests Present:

Courtney Coney, RATP Dev*
Lenny Cooksey, RATP Dev
Walter Durst, MTRA
Dennis Franklin, TCS
Olga Graziano, RATP Dev*
Natavis Eric Harris, Planning Consultant*
Frannie Heizer, Burr & Foreman
Mamie Jackson, COMET Rider
Zane McGhee, Davis & Floyd *
Alicia Peterson, RATP Dev *
Allison Terracio, The COMET Board Chair*

1. CALL TO ORDER AND DETERMINATION OF A QUORUM

Mr. Furgess called the meeting to order at 12:05 P.M. A quorum was present at the opening of the meeting. Ms. Heizer informed the Committee that based on the Bylaws, Chairwoman Terracio is not an official member of the committee and would be participating in the capacity as a board member and her presence would not count as a quorum.

2. ADOPTION OF AGENDA

Page 1

Motion:

A motion was made by Mr. Furgess to amend the agenda to add 5.F. Lower Richland Route 47 Discussion to be discussed before agenda item 5. A, and was seconded by Ms. Gleaton to adopt the July 12, 2023, Agenda with the amendment.

Approved: Brennan, Furgess, Gleaton

Absent: Herbert, Mood

Motion passed.

3. MIDLANDS TRANSIT RIDERS' ASSOCIATION UPDATE

Mr. Durst apologized for his absence at the June meeting due to scheduling conflicts. He reported that a Columbia NE rider was thrilled to take the bus to the airport and is passing the information on to his friends. He also reported that several riders have asked about a bench being placed on the corner of Zimalcrest and Broad River and asked if installation could be fast-tracked. He informed the committee that several mental health offices will combine offices on Two Notch near Providence Hospital in January and wanted to give the committee a heads up. Mr. Durst took a personal moment to address Mr. Furgess and apologize for any issues they have had over the years and thanked him for taking the lead on Phases 2 and 3 of the Lucius and River project and that he looks forward to working with the rest of the board on carrying out the project.

4. ADOPTION OF June 12, 2023, MINUTES

Page 2-7

Motion:

A motion was made by Mr. Brennan and seconded by Ms. Gleaton to adopt the June 12, 2023, meeting minutes.

Approved: Brennan, Furgess, Gleaton

Absent: Herbert, Mood

Motion passed.

Ms. Heizer advised the board that she was aware that Ms. Terracio attended the last committee meeting and voted, and after reviewing the Bylaws, she advised that Ms. Terracio does not have an official vote as a member of the committee and she also understands that none of the matters were controversial and there was no split-vote that would have made a difference in outcome of the vote and should be reflected as the minutes are approved. Ms. Heizer offered to draft a paragraph for inclusion in the last committee minutes to explain Ms. Terracio's role and approval of those minutes.

5. DISCUSSION AND ACTION ITEMS

F. Lower Richland Route 47 Discussion

Mr. Furgess asked that the committee discuss reinstating the Lower Richland Route 47 to a fixed route and reviewing the entire Lower Richland transportation be reviewed in an effort to make any necessary adjustments since Route 47 was mentioned at the last board meeting. Mr. Harris said staff could review the routes and comeback to the committee with feedback and since they did not have the necessary information today would it be appropriate to come to the full board meeting and recommend that the issue be taken back to the Service Committee. Mr. Furgess and Mr. Brennan agreed the matter should be taken before and voted on at the full board meeting. Mr. Harris said a number of factors would need to be

considered including the number of available operators and the availability of buses. The route was initially reduced because there was a low demand for ridership but can be reviewed if there is a need for increased service. Mr. Harris said if a new route plan is devised for Route 47 and presented to the board for a vote, the implementation would still not take effect until January 2024 since the service-change window to implement a new route for September is closed due to the Fall service changes. Mr. Cooksey confirmed that the next service change is September 10th and operators start reviewing those schedule on August 9th and there would be an extremely small window for a new Route 47 implementation. Mr. Furgess said his concern is assisting individuals in the Lower Richland area who benefit from the Penny Tax. Mr. Franklin said there would also need to be union negotiations involved with the change in service which may not be completed before the next board meeting. Ms. Bowers said the route would also need two buses and those available are Soda Cap buses. Ms. Mood said she is uncomfortable taking a motion to the board with regard to the service change with so many unknowns and would like to have all the necessary information and plans in place to present to the board for the approval of implementation in January. Mr. Cooksey said additional conversations need to be had with RATP Dev, The COMET and TCS to discuss all options and variables before presenting to the board. Ms. Gleaton asked Ms. Bowers what her thoughts were and she shared that when the fixed route was changed to ReFlex, ridership existed to justify Route 47 as fixed, but a previous Executive Director said there was a need for extra buses and discontinued Route 47 as a fixed route. She said she has been hearing from riders and drivers about the need to reinstate 47 as a fixed route. Ms. Mood said this is important information that should be factored in their decision-making.

Motion:

A motion was made by Mr. Furgess to recommend to the board that Lower Richland Route 47 be reinstated and that staff review other improvements that can be made in the Lower Richland area, seconded by Ms. Gleaton.

Approved: Brennan, Furgess, Gleaton, Herbert, Mood

Motion passed.

A. Passenger Amenities Program Update (Zane McGhee)

Pages 8-10

Mr. McGhee reported that Stop 1231 is listed as completed but has been for a while prior to this report. They are coordinating with SCDOT on an encroachment permit at Stop 99 on Decker Blvd. and have been coordinating with McEntire Produce to add a shelter at their facility and are still working with Midlands Tech at their Northeast Campus to determine the best location for a shelter. He referred to the Zimalcrest/Broad River Road location mentioned by Mr. Durst and said it will require an easement from the property owner which they have been having difficulties contacting. He asked if anyone was familiar with the property owner, he welcomed their input for contacting them. Ms. Mood said her understanding is that because the shelter is located on private property permission must be gained from the property owner and Mr. McGhee concurred and said it applies to most of Broad River Road. Ms. Mood asked Mr. McGhee to provide the property owner's contact information to staff so they can research how to contact them. Mr. Durst also suggested contacting the owner of the power box at the location to obtain contact information.

B. Lucius & River Road Superstop Update (Eric Harris)

Mr. Harris reported that the site is set to be completed by the end of August and the board approved moving the implementation date to January 2024 and those plans are being worked through including additional public outreach strategies. Several recommendations were received with regard to restroom facility options and contact has been made with those companies, the next step is to locate grant funding for the installation. A timeline has not been developed for identification of funds to construction, but one company gave a timeline of 30-90 days for installation. of 30-beekickoff meeting for the public outreach held the week of June 5th was successful and a lot of feedback was received. Ms. Mood asked about the stability of the land and concrete and Mr. Harris said the contractor is currently working on determining the land stability and explaining why there were cracks in the concrete and the project remains on schedule.

C. Transit Operations Report May 2023 (Lenny Cooksey)

Pages 11-37

Mr. Cooksey reported that they have one confirmed COVID case which has not affected operations. He reported that customer service complaints were lower in June 2023 than 2022. He recognized Moses Taylor for 43 years of service with RATP Dev, and Marshal Gamill who has reached 22 years of service. He noted that Maintenance Manager, Kevin Bundrick, has continued the 100% on-time preventable maintenance, and the mean distance between road call target miles continues to exceed its target.

OTP

- Fixed Route OTP for June 2023: 77.78%
- Fixed Route OTP decreased slightly by 0.68% compared to May 2023 at 78.46%
- DART/Paratransit OTP for June 2023: 91.05%
- DART/Paratransit OTP increased 0.08% compared to May 2023 at 90.26%

Ridership

- Average Daily Ridership has been positive for the last 6 months
- Slight decrease in ridership for June at 127,984 compared to May at 131,263
- 121,579 total ridership for May 2022
- DART Ridership decreased by 2.7%

Safety

- 1 personal injury in the last 42 days with no loss of time from work
- 0 Preventable accidents

KPI

- OTP - Fixed Route 77.78% of 85% goal; Paratransit 91.05% of 90% goal
- Miles Between Road Calls Exceeded 12,581 of 12,000% goal
- Customer complaints 2.34 of 6.0% goal
- Preventable accidents .11 of 2.0%

D. DART Non-Certified Passengers/Fixed-Route Fares (Dennis Franklin)

Page 38

Mr. Franklin reported that RATP Dev, TCS and The COMET staff met to discuss issues with total ridership and referred the committee to page 38 which shows the following:

- DART's number of trips has increased (5800 - 6200 per month)
- 40 - 50 new riders approved each month
- From 2020, the average trip has increase from 22 mins per trip to 31.8 mins per trip

- Average miles increased from 5.62 to 8.75 during the same period.

Mr. Franklin noted that the changes have occurred due to the areas being served and because several providers are no longer in service. He explained that current DART riders go through an application process, are picked up by DART and transported to their eligibility assessor. He said their concerns are that the passenger has not been through travel training and does not understand the process, and liability for those passengers. He said they would like to propose that the Service Committee recommend to the Board that free rides to initial assessments be discontinued because it takes spots from individuals who have already been assessed for eligibility and are current DART customers. The other recommendation is to eliminate DART passengers to ride fixed route for free because they are already receiving a discounted rate with that could be cheaper. Dr. Prince said after speaking with Mr. Franklin and Mr. Cooksey she agrees with the recommendation. Ms. Ransom provided historical information that since the inception of the CMRTA this service has provided that any certified DART riders could ride for free because paratransit much more costly than fixed-route which is always in service that ridership from paratransit to fixed-route was encouraged.

Motion:

A motion was made by Ms. Herbert to recommend to the board that free DART services no longer be provided to people for their assessment of eligibility to use DART services, seconded by Ms. Gleaton.

Approved: Gleaton, Herbert, Mood

Absent: Brennan

Nays: Furgess

Motion passed.

After several questions and concerns were raised by about the second recommendation for elimination of free rides for DART passengers on fixed-route, Mr. Cooksey asked that the second recommendation be tabled until next month after staff has had a chance to meet again to discuss and clear up any ambiguity. Ms. Mood agreed that a second motion would not be made and the matter tabled.

E. Ridership Analysis – May 2023 (Eric Harris)

Pages N/A

Mr. Harris did not report and accepted the ridership report given by RATP Dev. Updates will be given in August. Mr. Harris also noted for the record in relation to Lucius and River that a formal RFP process will be required for the restroom additions.

6. ADJOURNMENT

Motion: A motion was made by Ms. Gleaton to adjourn.

Approved: Aye (Voice Vote, 1:32 P.M.)

The meeting was adjourned at 1:32 P.M.

CENTRAL MIDLANDS REGIONAL TRANSIT AUTHORITY

Adopted this _____, 2023.

Prepared by:

Angela R. Jacobs, Board Clerk & Community Programs Specialist

Reviewed by:

Pamela Bynoe-Reed, Director of Marketing & Community Affairs/PIO
(Board Administrator)

Approved by:

Christopher Lawson, Secretary

DRAFT

August 2, 2023

LeRoy DesChamps
Chief Operating Officer
The COMET
3613 Lucius Rd
Columbia, SC 29201

Re: Bus Stop Shelter and Bench Permitting - Summary of Work
D&F Job Number: 13827.00

Dear Mr. DesChamps:

WORK COMPLETED THIS PERIOD:

- Site Designs, Status Reports, Effort Review, and Project Management
- Coordination with SCDOT and property owner for Stop #799
- Finalized location for Midlands Tech Shelter
- Made contact with property owner for Stop #1134
- Monthly Meeting with Jackie Bowers/Eric Harris to discuss new work requests and review pending questions needing COMET input

WORK IN PROGRESS:

- Coordination with Lexington Medical regarding Stop #1378 easement agreement
- Coordination with McEntire Produce regarding Stop #195 easement agreement

UNRESOLVED ISSUES:

- SCDOT addressing ADA compliance issue with new sidewalk at Stop #1650

PENDING ITEMS REQUIRING CLIENT ACTION:

- None

Very truly yours,

DAVIS & FLOYD



Todd J. Warren, PE
Vice President

COMET Shelter and Bench Permitting Status August 2023

Completed Sites

Shelters

None for this period

Benches

None for this period

Boarding and Alighting

None for this period

Approved Sites

Shelters

None for this period

Benches

Stop #1650 Hardscrabble Bush NB (Provided to AOS, coordinating with SCDOT project)

Boarding and Alighting

None for this period

Sites Currently Under Permit Review

Shelters

Stop #799 Decker Boulevard and Quiet Ln (SCDOT Encroachment)

Stop #195 McEntire Produce (Awaiting signed easement)

*Stop #838 Main Elmore NB

Benches

Stop #1378 W Hospital Sunset NB (Lexington Medical is reviewing easement)

*Stop #319 Broad Heritage SB

*Stop #1041 Forest Shandon Baptist EB

*Stop has been added/updated to this status since previous report.

Boarding and Alighting

None for this period

Sites in Design

Shelters

Stop #788 Decker Boulevard and Wedgefield Road

Stop #1192 Medical Park @ Prisma Health

Stop #43 Pendleton Barnwell EB

Stop #3203 Midlands Tech College NE SuperStop

Benches

Stop #225 Harbison Boulevard and Parkridge Drive

Stop #1134 Broad Zimalcrest SB

Stop #331 Broad Shivers SB

Stop #683 Main Prescott NB

Stop #21 Harden Rosewood NB

Stop #22 Rosewood Howard EB

Stop #45 Rosewood Kilbourne WB

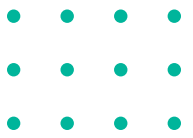
Stop #335 Gervais Oak EB

Stop #1233 Sumter College SB

Stop #269 Gavilan Campanella

Stop #223 Read Oak EB

*Stop has been added/updated to this status since previous report.



RATP Dev USA Monthly Performance Report

July
2023



Hot Topics:

COVID-19 – Lenny Cooksey

Customer Service – Alicia Peterson

Maintenance – Kevin Bundrick

Operations – Rickey Mack

Safety and Training – Mary Saunders

Human Resources – Courtney Coney

Performance Indicators - Lenny Cooksey





Covid- 19

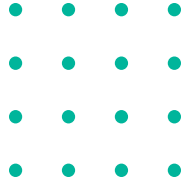


U.S. COVID hospitalizations climb for second straight week. Is it a summer surge?

- The U.S. has experienced increases in Covid-19 during the past three summers
- An ensemble of academic and federal modelers said last month that the main period of Covid-19 activity is expected to occur in late fall and early winter over the next two years, with medium peak incidence between November and mid-January
- Updated vaccines are expected to be available by late September, the CDC said earlier this month, after the FDA requested that drugmakers begin producing new formulations targeting XBB strains

Bus Cleaning	Totals
Detailed	350
Special Detail	1





Customer Service





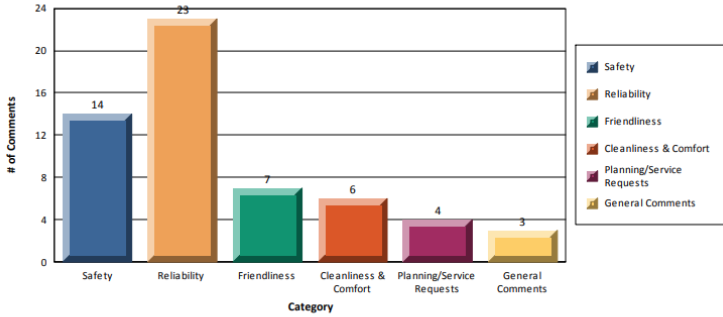
Customer Service

CUSTOMER COMMENTS

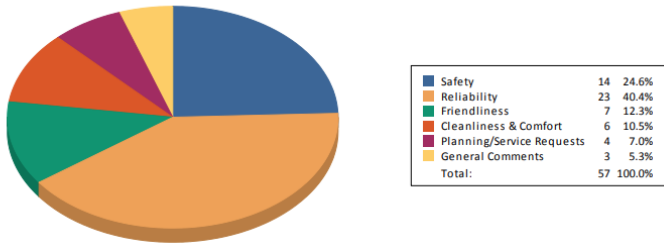
For the Period: 7/1/2023 to 7/31/2023



Number of Comments by Category



Percentage by Category



For the month of July 2023, RATP Dev had a total of 52 customer complaints comparing to 30 of June 2023, that is a 43.90 % increase from the previous month. The Safety category was increased to 24.6% from 18.8% and the Reliability category decreased to 40.4% from 46.9% of the previous month.

The complaint rate 4.21% (complaints per 10,000 riders) for the month of July is within our target goal of 4.00 to 6.00 complaints per 10,000 customers.

RATP Dev has been continuously addressing the customer complaint issues in different training programs, personal counseling/coaching, and other management actions.



Courtney Coney
HR Manager

Manager Spotlight



Olga Graziano
IT Manager

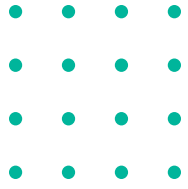
Manager Spotlight



Alicia Peterson
QA Manager

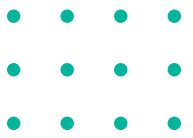
Manager Spotlight



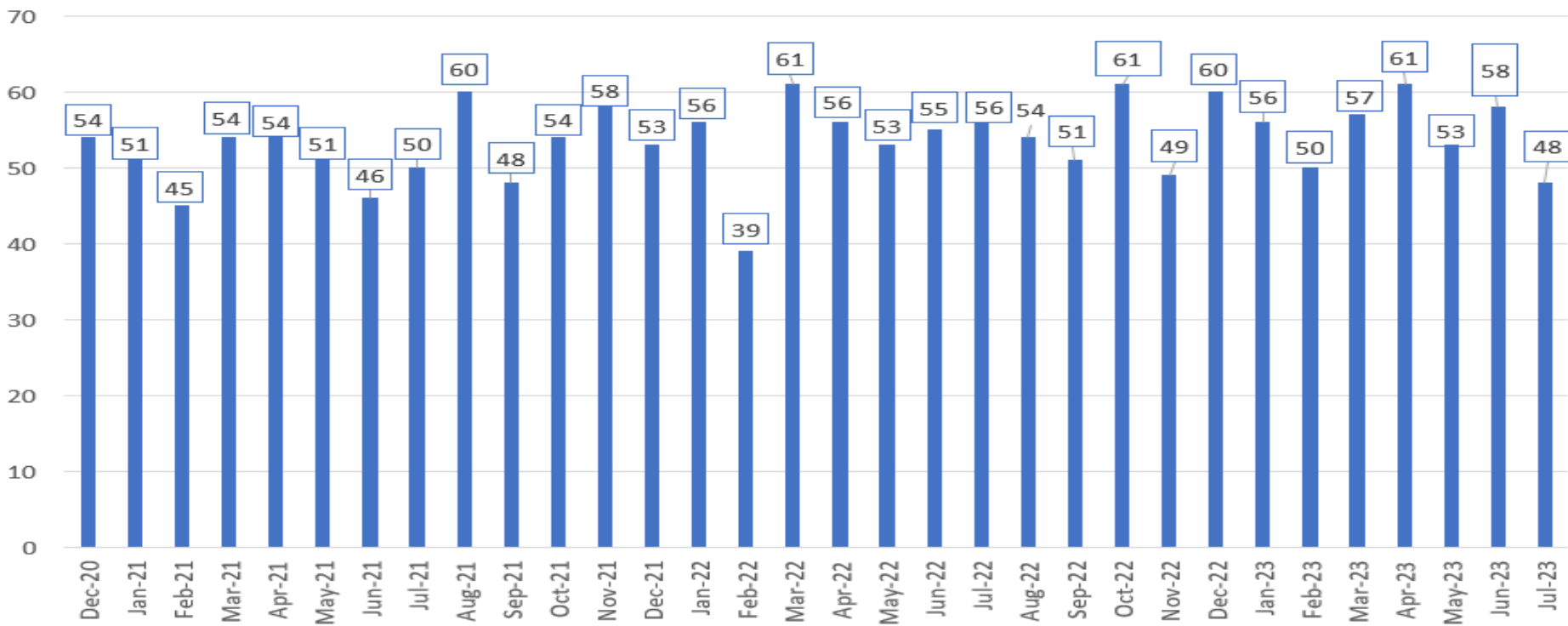


Maintenance





Preventive Maintenance

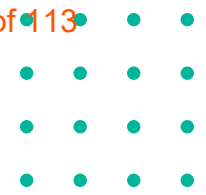


Scheduled PMIs = 48
Completed PMIs = 48
100% On-Time

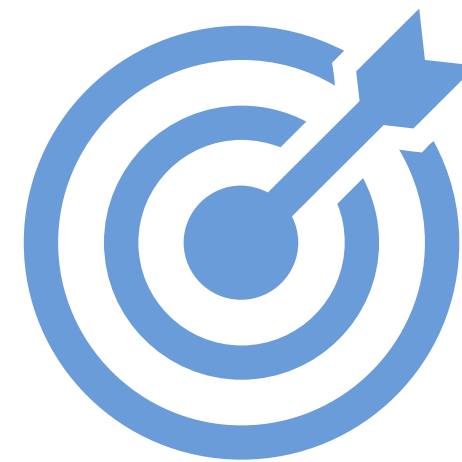
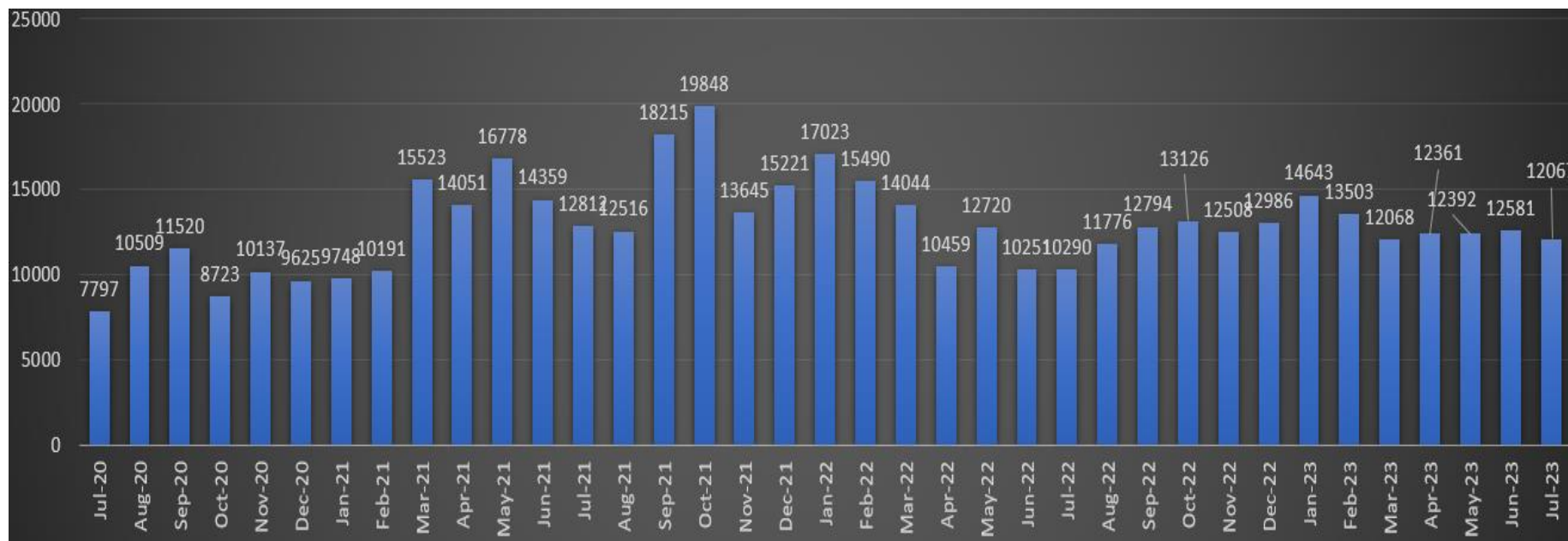
PMI'S ARE TRIGGERED BY ACCUMULATED MILEAGE

AMOUNT VARIES BY MONTH





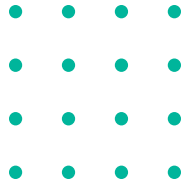
PM Results



Vehicle Preventative Maintenance Interval Statistics

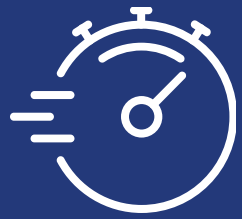
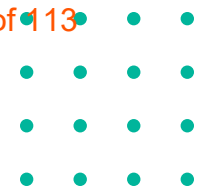
Total Miles Between Road Calls = **12067**
 Target Miles Between Road Calls = 12067



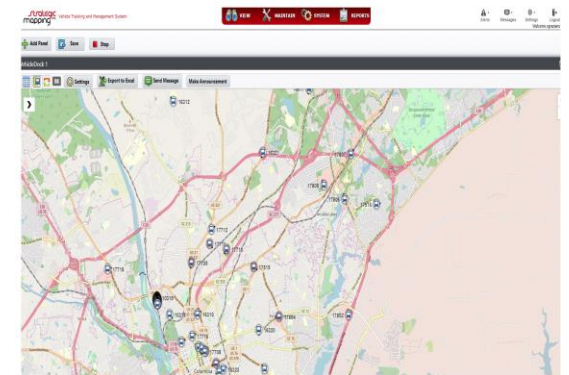


On Time Performance (OTP)





OTP for Fixed Route / DART / Flex

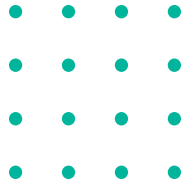


On-time performance is a leading indicator of service reliability and is inscribed as an essential [service standard](#). On-time performance measures the percentage of actual arrival times that are between (<1) minutes early and five (<6) minutes late at designated points along transit routes. The metric is reported by the COMET's AVL system for Fixed Route (Strategic Mapping) and DART Paratransit (Trapeze).

- Fixed Route OTP for July 2023: **77.90%**
- Fixed Route OTP increase by 0.15% compared to June 2023 at **77.78%**
- DART/Paratransit OTP for July 2023: **91.22%**
- DART/Paratransit OTP increased **0.18%** compared to June 2023 at **91.05%**

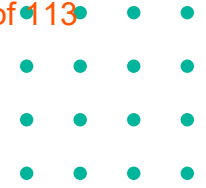
Clever Devices has been replaced with the new AVL system, Strategic Mapping. We are currently in phase one of three-part implementation to improve depiction of the system OTP.





Ridership Summary

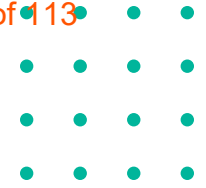




All Aboard

- **123,381 total ridership for July 2023**
- 118,533 total ridership for July 2022
- Ridership has increased by 4.09% compared to July 2022





Previous Month Comparison

- **123,381 total ridership for July 2023**
- 127,984 total ridership for June 2023
- Ridership decrease of 3.59% compared to June 2023

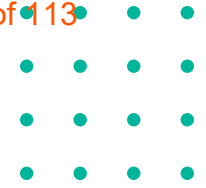




Average Daily Ridership

Average Daily Ridership					
Month	Monthly Ridership		Average Daily Ridership		
	2022	2023	2022	2023	% Change
January	106,428	144,066	15,204	20,581	35%
February	112,303	150,528	16,043	21,504	34%
March	138,952	158,632	19,850	22,662	14%
April	134,878	147,800	19,268	21,114	10%
May	121,579	131,263	17,368	18,752	8%
June	121,607	127,984	17,372	18,283	5%
July	118,533	123,381	16,933	17,626	4%
August	150,627		21,518	--	-100%
September	170,842		24,406	--	-100%
October	155,044		22,149	--	-100%
November	122,649		17,521	--	-100%
December	111,331		15,904	--	-100%
Year to Date	1,564,773	983,654	223,539	140,522	-37%



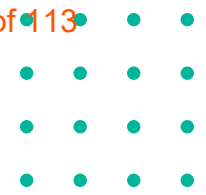


GAMECOCK RIDERSHIP

Route	July 2023 Total	June 2023 Total	Variance	% Change
13 North Loop	38	28	10	26%
14 Express	330	394	64	-19%
15 Yellow	No Service	No Service	EVOLVE	EVOLVE
16 Greek Village	No Service	No Service	EVOLVE	EVOLVE
17 Green	No Service	No Service	EVOLVE	EVOLVE
18 Red	No Service	No Service	EVOLVE	EVOLVE
19 Blue	No Service	No Service	EVOLVE	EVOLVE
20 West Campus	97	234	137	-141%
24 Evening 1	No Service	No Service	EVOLVE	EVOLVE
25 Evening 2	No Service	No Service	EVOLVE	EVOLVE
	465	656	191	-41%



- 465 Total passenger boardings
- Difference of -191 passengers compared to June



DART Ridership



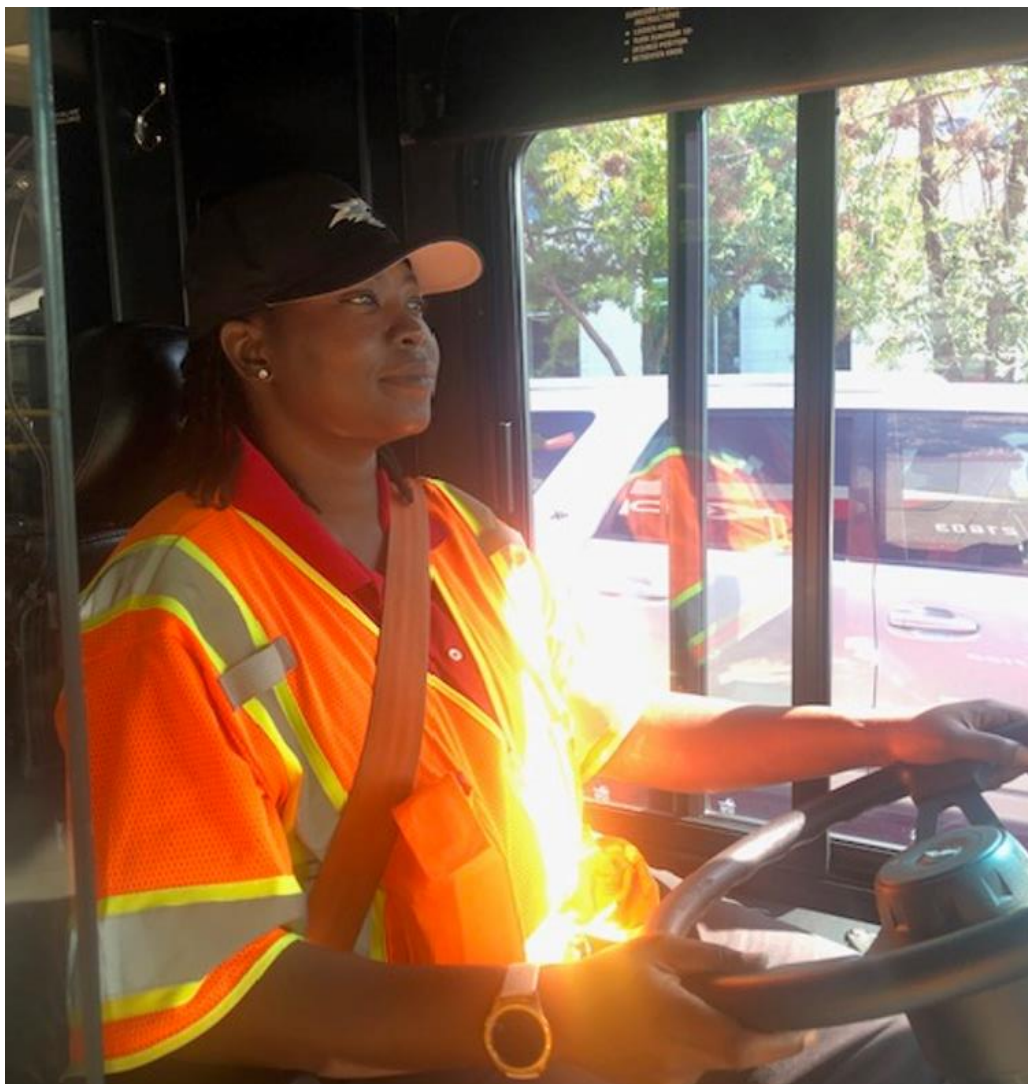
Passenger Information

<i>Clients</i>	76.24	%
<i>Companions</i>	0.00	%
<i>Attendants</i>	23.22	%
<i>Others</i>	0.55	%
<hr/>		
<i>Pass. Per Trip</i>	1.23	
<i>Average Length</i>	30.93	Minutes
<i>Average Distance</i>	8.79	Miles
<i>Transferred Passengers</i>	0	

Requested Trip Information

<i>Total Requested</i>	5133	<i>No Shows</i>	96
<i>Unscheduled</i>	9	<i>Cancel CD</i>	114
<i>Unscheduled</i>	0.18 %	<i>No Shows</i>	4.09 %
<i>Cancel Adv.</i>	1372		
<i>Late Cancels</i>	19	<i>No Shows Other</i>	0
<i>Same Day</i>	139	<i>Cancel Other</i>	0
<i>Site Closure</i>	10	<i>Missed</i>	0
<i>User Error</i>	41	<i>Missed T</i>	0
<i>Cancels</i>	30.80 %	<i>Missed</i>	0.00 %
<i>Transferred Trips</i>			0





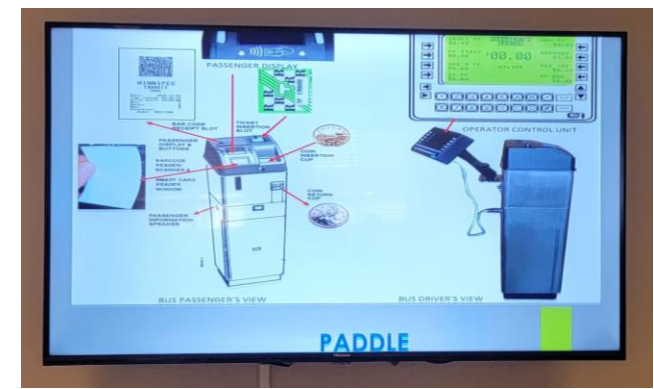
**Safety First,
Safety Always**





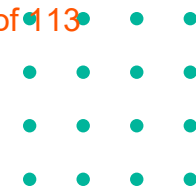
Safety First

- Safety First Safety Always
- Safety Meeting – Spring Into Safety
- Facilities Inspection
- Mandatory Safety Bulletin
 - Drive Cam
- Preventable RATPDEV – 2(0.75) Per 100,000
- Preventable DART-0
- Total Collisions – 5 Per (1.82) 100,000





Safety Performance



Vehicle Accidents				
	Fixed	Flex	Dart	Total
Revenue Incidents/Accident	5	0	0	5
Deadhead Incidents/Accidents	0	0	0	0
Per 100,000 Miles	0	0	0	1.82
Total Incidents /Accidents	5	0	0	5

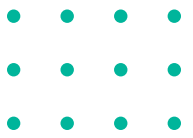
Injuries				
	Fixed	Flex	Dart	Total
Revenue Injuries	0	0	0	1
Deadhead Injuries	1	0	0	0
Per 100,000 Miles	0	0	0	0.37
Total Injuries	1	0	0	1



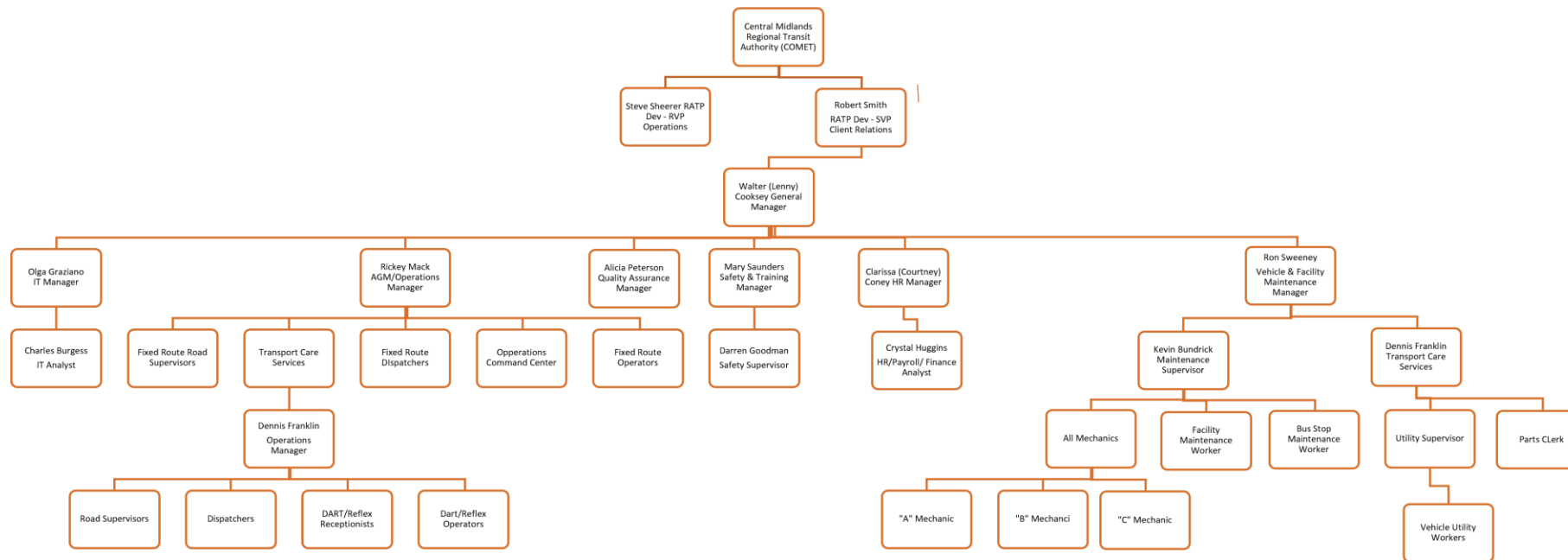


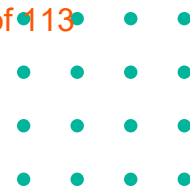
Human Resources





Organizational Chart

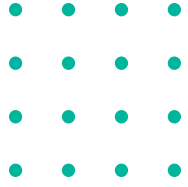




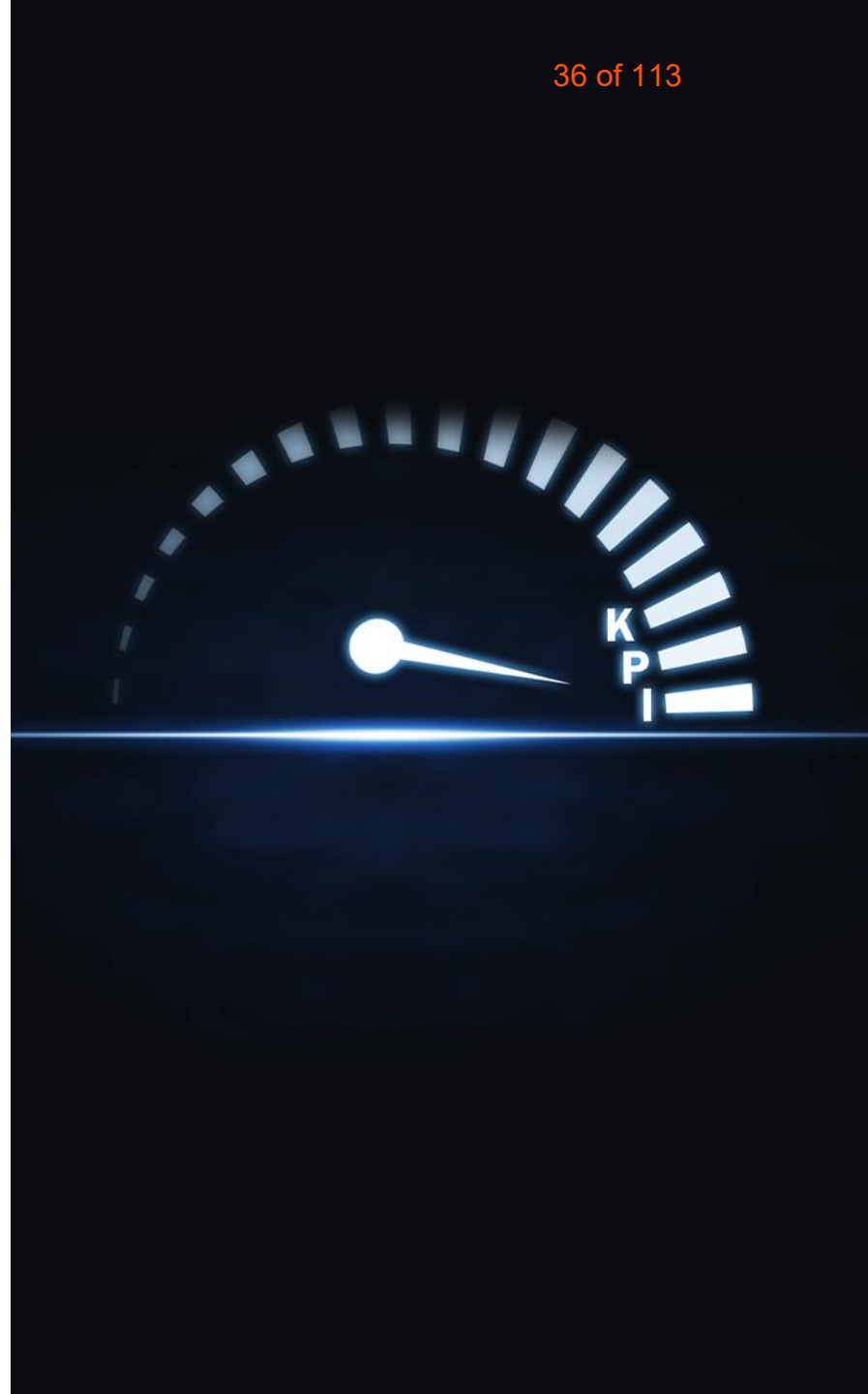
Staffing & Recruitment

Description	Active	Training	Leave	Total
Fix Route Operators/USC	115	2	8	125
Ops Supervisor (USC)	2			2
Dispatcher/supervisor (USC)	1			1
Fix Route Operations Supervisor	09			09
Fix Route Dispatcher	2			2
DART/Reflex Reservationist	3.0			3.0
TCS Total Operators	21		3	24
IT Analyst	1			1
Mechanics	13	0	0	13
Lead mechanic/Maintenance Supervisor	1			1
Utility Worker	10			10
Shopkeeper	1			1
Totals	179.0	2	11	192.0





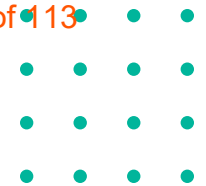
Key Performance Indicator (KPI)





Key Performance Indicator (KPI)

Performance Measure	<i>RATP Dev Contract Goal</i>	<i>RATP Dev July /Actual</i>
On-Time Performance (Fixed Route / Paratransit)	<i>85% / 90%</i>	<i>77.78%/ 91.22%</i>
Miles Between Road Calls	<i>12,000</i>	<i>12,067</i>
Customer Complaints (Per 10,000 Customers)	<i>6.0</i>	<i>4.21</i>
Preventable Accidents (Per 10,000 Miles)	<i>2.0</i>	<i>0.07</i>



Thank You

Public Transportation Agency Safety Plan (PTASP)



July 2023 (Revised)



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Section 1. Transit Agency Information

General Information

Transit Agency Name	Central Midlands Regional Transit Authority (The COMET)			
Transit Agency Address	Lowell C. Spires Jr. Regional Transit Facility 3613 Lucius Road, Columbia, SC 29201			
Name and Title of Accountable Executive	LeRoy DesChamps, Interim Executive Director/CEO			
Name of Chief Safety Officer	Contractor Safety & Training Manager			
Name of SMS Executive	Arlene Prince, Director, Regulatory Compliance and Civil Rights Officer			
Modes of Service	Fixed Route (FR), Demand Response (DR), Van Pool (VP), Demand Response Taxi (DT), Commuter Bus (CB)			
FTA Funding Sources	FTA Section 5307, 5310, 5339, 5311			
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
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	N/A			

Modes of Service Directly Provided: None

Central Midlands Regional Transit Authority (The COMET) is a Tier II Transit Agency that operates in the greater Columbia area in Columbia, South Carolina. The COMET presently provides fixed route and paratransit, van pool, demand response taxi, and commuter bus services to the city of Columbia and Richland and Lexington counties in South Carolina. The system is made up of 34 fixed routes and three flex routes. The fleet consists of 97 fixed route vehicles and 25 paratransit vehicles. Total passengers transported during FY 2022 was 1,547,622 (FR), 59,366 (DR) with a total system passenger miles of 3,626,955.

Contract services are provided by RATP Dev USA, Inc., Lyft, and Enterprise Holdings. The COMET does not provide any direct transit services. All services including operations and maintenance services are contracted.

The COMET and Contractor safety representatives:

The COMET: Safety Management System (SMS) Executive

Contractor: Chief Safety Officer (CSO): Safety & Training Manager

The Chief Safety Officer for the transit operation’s contractor will report to The COMET SMS Executive, and the contractor’s General Manager to ensure that both The COMET and the transit operations Contractor executive management are engaged and aware of safety issues.

Key staff include the SMS Executive, Chief Safety Officer (also Safety and Training Manager), Director of Operations, Facility and Vehicle Maintenance Manager, Paratransit Operations Manager, Operations Manager, Information Technology Manager and Quality Assurance Manager.

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

Commonly Used Definitions

Acronym	Word or Phrase
ADA	Americans with Disabilities Act of 1990
AE	Accountable Executive
ASP	Agency Safety Plan (also referred to as a PTASP in Part 673)
CFR	Code of Federal Regulations
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SCDOT	South Carolina Department of Transportation
SMS	Safety Management System
The COMET	Central Midlands Regional Transit Authority
U.S.C.	United States Code
VRM	Vehicle Revenue Miles

Section 2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	RLS & Associates, Inc. in cooperation with South Carolina Department of Transportation and The COMET		
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	
	Relevant Documentation (title and location)		
	Chair, Board of Directors/The COMET		
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification	
	LeRoy DesChamps		
	Relevant Documentation (title and location)		
	Executive Director/CEO, 3613 Lucius Road, Columbia, SC 29201		
Version Number and Updates			
<i>Record the complete history of successive versions of this plan.</i>			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	All	Initial Public Transportation Agency Safety Plan	6-19-20
2	All	Updates, Change in Personnel and contractor	7-31-23

Annual Review and Update of the Public Transportation Agency Safety Plan

Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.

The COMET's Public Transportation Agency Safety Plan also referred to as Agency Safety Plan, will be jointly reviewed and updated by The COMET's Executive Director, SMS Executive, Chief Safety Officer, and PTASP Safety Committee in July of each year. The Executive Director will review and approve any changes, sign the revised Agency Safety Plan, and forward to The COMET's Board of Directors for final review and approval.

Along with annual updates, The COMET may update the plan if The COMET:

- Determines its approach to mitigating safety deficiencies is ineffective;
- Makes significant changes to service delivery;
- Introduces new processes or procedures that may impact safety;
- Changes or re-prioritizes resources available to support Safety Management Systems and the Public Transportation Agency Safety Plan;
- Changes are made to facilities, equipment or rolling stock with a potential to safety;
- A change in contractors; and/or
- Significant changes to COMET's organizational structure

Revisions will be submitted to the PTASP Safety Committee and Board's Service Committee with recommendations to the full Board of Directors. Upon adoption by the Board, revisions will be communicated to The COMET's staff and contractor employees.

21 Safety Management Systems (SMS)

Safety Management Systems is a management system, akin to a financial or quality management system. It ensures that a public transportation agency, regardless of its size or service environment, has the necessary organizational structures, activities and tools in place, and the necessary safety accountabilities to direct and control resources to manage safety proactively and optimally.

Safety Management Systems activities proactively detect safety concerns and organizational factors, and correct them using data-driven prioritization. As such, important to its success are the:

1. Effective collection, analysis, and sharing of safety data, and
2. Active, accurate, and routine safety performance measurement.

Safety Management Systems provides transit and oversight agencies with additional tools and activities, and therefore new opportunities to efficiently and effectively align safety priorities and promote continuous improvement in safety performance.

SAFETY MANAGEMENT SYSTEM COMPONENTS

<p>Safety Management Policy</p> <ol style="list-style-type: none"> 1. Safety Management Policy Statement 2. Safety Accountabilities and Responsibilities 3. Integration with Public Safety and Emergency Management 4. Safety Management System Documentation and Records 	<p>Safety Assurance</p> <ol style="list-style-type: none"> 8. Safety Performance Monitoring and Measurement 9. Management of Change 10. Continuous Improvement
<p>Safety Risk Management</p> <ol style="list-style-type: none"> 5. Safety Hazard Identification 6. Safety Risk Assessment 7. Safety Risk Mitigation 	<p>Safety Promotion</p> <ol style="list-style-type: none"> 11. Safety Communication 12. Competencies and Training

Section 3. Safety Performance Targets (SPT)

<p>Safety Performance Targets Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.</p> <p><i>The following targets were developed based on the past five years (2015 – 2019) of transit safety data collected by The COMET</i></p>							
Mode of Service	Fatalities (Total)	Fatalities (Rate)	Injuries (Total)	Injuries (Rate)	Safety Events (Total)	Safety Events (Rate)	System Reliability
Fixed Route (MB)	0	0 per 100,000 VRM	0	4.0 per 100,000 VRM	0	0 per 100,000 VRM	15,000
Demand Response/ Paratransit (DR)	0	0 per 100,000 VRM	0	4.0 per 100,000 VRM	0	0 per 100,000 VRM	15,000
Vanpool (VP)	0	0 per 100,000 VRM	0	0 per 100,000 VRM	0	0 per 100,000 VRM	15,000
Demand Response Transportation Network (DN)	0	0 per 100,000 VRM	0	0 per 100,000 VRM	0	0 per 100,000 VRM	15,000

31 Safety Performance Targets and Measures

The COMET collects monthly data from contractors to include safety and performance data. This data is used annually to develop Safety Performance Targets included in this plan. The COMET

[Type here]

[Type here]

[Type here]

uses current and historic safety data to develop targets while also monitoring monthly data to identify trends requiring mitigation actions.

Additionally, when developing targets, The COMET takes into consideration the following attributes that may impact target development:

- New vehicles or facility(s);
- Changes in training programs;
- Changes in the process of employee evaluation, asset review, and process review;
- Growth in service (increased number of routes, new service modes); and
- New contractor(s).

Safety Performance Target Coordination		
<i>Describe the coordination with the State in the selection of State and MPO safety performance targets.</i>		
Once targets are developed as part of the Plan update in July of each year, The COMET will share and discuss those targets and amendments with and submit to South Carolina Department of Transportation (SCDOT) at requested time.		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	South Carolina Department of Transportation (SCDOT)	July __, 2023 (Revised)
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Columbia Area Transportation Study (COATS)	July ____, 2023 (Revised)

Section 4. Safety Management Policy

4.1 Safety Management Policy Statement

Central Midlands Regional Transit Authority (The COMET) is committed to providing safe, secure, clean reliable and efficient transportation services to the patrons. This policy statement serves to express management’s commitment to and involvement in providing and maintaining a safe and secure transit system.

In the interest of safety and security, and in order to comply with the Federal Transit Administration (FTA) requirements, The COMET’s goal is to place primary importance on the personal health and safety of each employee, its contractors, and passengers. Accordingly, prevention of work-related accidents/injuries must be given precedence over operating productivity whenever necessary. Management will provide, to the greatest extent feasible, safety devices and protective equipment necessary for personal health and safety consistent with the highest standards.

The objectives of this Safety Policy are to:

1. Create a culture that supports safety and security through the appropriate use and operation of equipment and resources among our employees and contractors.

2. Partake in and strengthen community involvement and participation in the safety and security of our system.
3. Develop and implement a Threat and Vulnerability Assessment program and, based on the results of this program, establish a course of action for improving physical safety and security measures and emergency response capabilities.
4. Expand our training program for employees, volunteers and contractors to address safety and security awareness and emergency management concerns.
5. Enhance our coordination with partner agencies regarding safety, security and emergency preparedness issues.
6. Ensures that safety, security and emergency preparedness are addressed during all phases of system operation including hiring and training of personnel; procurement and maintenance of equipment; development of policies and procedures; delivery of service, and coordination with local emergency management and first responder agencies.
7. 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.

The COMET executive management is responsible for maintaining a coordinated safety system in order to identify and prevent unsafe acts and conditions that present a potential danger or threat to public safety. The Accountable Executive has responsibility for maintaining and implementing this policy and directing The COMET employees and management towards complying with the policies, procedures, and standards included in this document. All personnel, and contract service operators are charged with the responsibility of adhering to this Safety Policy. Any violation of safety and security practices is subject to appropriate administrative action. The Accountable Executive is ultimately responsible for enforcing the Safety Policy and maintaining a safe and secure system. The SMS Executive and the Chief Safety Officer as designated by the Executive Director/CEO has the responsibility of carrying out the intent of this policy.

The COMET will maintain a written safety program to which strict adherence will be mandatory. The Accountable Executive will be responsible for monitoring compliance with all provisions of the safety program.

Accountable Executive

Date

42 Safety Management Policy Communication

The COMET realizes the importance of ensuring its employees, contracted employees and passengers are aware of its safety management policies and procedures to effectively manage the system's day to day operations. To do this, The COMET relies on several forms of effective communication by contractors to their employees and passengers as well as The COMET employees.

Contracted Employees: The COMET is constantly evaluating existing policies and procedures of its contractors as well as its internal processes to verify their effectiveness, as part of contract oversight weekly. To do this, The COMET seeks input from the contractor's key personnel, 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:

- Formal notice to contractors;
- Informal communication to contractors;
- Contract amendments or change orders; and
- Contract itself

The COMET expects of its contractors 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 acknowledgment signature is required of each employee verifying their understanding of the change.

Passengers: If a passenger policy is changed or added, The COMET and contractors notify passengers through the following methods:

- Notice posted on vehicle and facilities including effective date and who to contact for more information;
- Changes to digital passenger guidance including schedules and ride guides as appropriate;
- Public Meetings;
- Social Media; and
- Any services impacted by policies changes will include outreach as required by Federal Transit Administration Guidance.

The COMET Employees: The COMET reviews and evaluates its internal policies, procedures and processes on a weekly basis to determine effectiveness of identifying risk and response through Safety Management System principles. Through weekly meetings and daily interactions, The COMET employees are able to share information from each contractor and make adjustments to procedures or processes as needed.

43 Authorities, Accountabilities, and Responsibilities

As mentioned in the Safety Policy Statement, the ultimate authority for the success of this Agency Safety Plan falls to the Accountable Executive. Managers, as well as employees fulfilling their commitment to safety on a day-to-day basis support the Accountable Executive.

Accountable Executive (AE): The Accountable Executive will determine, based on feedback from contractors, the level of Safety Management Systems principles to ensure a safe work environment, passenger experience and community safety. The COMET's Accountable Executive

is committed to ensuring service contractors maintain the highest level of safety standards and safety oversight.

The Accountable Executive, and associated support staff of The COMET will provide contract oversight and monitoring to include accountability for all aspects of safety as well as oversee internal processes to ensure that working for The COMET directly is safe. The Accountable Executive is responsible for developing the RFP process for contracted service and will include language relative to the responsibility of the contractor to manage and operate service using Safety Management Systems principles. Though contractors are not required under 49 CFR Part 673 to develop their own Public Transportation Agency Safety Plan, they are required to follow Safety Management Systems methods of managing risk to include compliant Employee Safety Reporting Program.

Additional responsibilities include, but are not limited to:

- Make decisions about resources (e.g. people and funds) to support asset management, Safety Management Systems activities, and capital investments
- Sign Safety Management Systems implementation planning documents
- Endorse Safety Management Systems implementation team membership
- Complete and submit the National Transit Data reports
- Responsible for Transit Asset Management Plan

SMS Executive: The Safety Management Systems Executive will serve as an intermediary between the contractor's Chief Safety Officer and The COMET's Accountable Executive associated with a contract with The COMET. The position requires oversight and interaction with contract operations, maintenance, human resources, training and safety to ensure the Agency Safety Plan is being followed and a culture of safety is present among all contract employees.

Chief Safety Officer: The Chief Safety Officer, also the contractor's Safety and Training Manager, is responsible for ensuring safety elements in the following areas are properly managed with the intent of creating a culture of safety. The Chief Safety Officer will maintain training proficiency relative to their role in implementing Safety Management Systems per requirements in 49 CFR Part 673.

- Employee Safety Reporting Program
- Safety Performance Targets and Measures
- Safety Risk Management
 - Safety Hazard Identification
 - Safety Risk Assessment
 - Safety Risk Mitigation
- Safety Assurance
 - Safety Performance Monitoring and Measurement
- Safety Promotion
 - Competencies and Training
 - Safety Communication
 - Director of Operations
 - Contractor General Manager
 - Contractor Operations Manager
 - Contractor Facility and Vehicle Maintenance Manager
 - Contractor Quality Assurance Manager
 - Contractor Paratransit Operations Manager

- Contractor Information Technology Manager
- Maintains Safety Management Systems documentation
- Direct hazard identification and safety risk assessments
- Monitor safety risk mitigation activities
- Provide monthly safety performance reports to The COMET
- Brief the Safety Management Systems Executive on SMS implementation progress
- Facilitate and document Safety Committee meetings
- Develop and implement Safety Management Systems training
- Conduct safety analysis to identify trends
- Initiate root cause analysis through investigation of safety events

The COMET's Contractor Leadership

Listed below are the Directors and Managers that play an important leadership or support roles in providing important data or resources to accomplish The COMETS's safety goals and/or the day to day safe operation of the Agency's modes of transportation.

Contractor Facility and Vehicle Maintenance Manager

- Provides
 - Total maintenance (labor and parts) cost per system
 - A monthly report regarding road calls including major breakdowns
 - A monthly report regarding the cost of in-house repairs (both labor and parts) per mode of transit service
 - A monthly report of facility inspections and repair completed
- Participates in root cause occurrence investigations

Contractor Operations Manager

- Ensures the trainers of operators and maintenance personnel conduct and document evaluations for operators and maintenance personnel
- Reviews quarterly data provide by the Chief Safety Officer and trainers, and use that information to modify existing training or create new training
- Participates in root cause occurrence investigations
- Communicates with Chief Safety Officer on Safety Management System elements like Hazard Identification, Hazard Assessment, Hazard Mitigation and Follow-up of mitigation strategies.

Contractor Information Technology Manager

- Ensures that The COMET's data is protected from cyber-crime and viruses
- Maintains software with required updates
- Communicates with technology vendors if problems occur
- Assists personnel with technology issues or questions
- Oversees social media platforms and The COMET's web site

Contractor Quality Assurance Manager

- Works with all departments to ensure local, State and Federal regulations are being followed
- Reviews inspections and evaluations conducted by outside agencies
- Ensures data collection and reporting methods are consistent with the COMET contract

Contractor Paratransit Operations Manager

- Ensures paratransit operators are meeting The COMET training standards for working with persons with cognitive and physical disabilities
- Oversight of service following Americans With Disabilities (ADA) Act requirements under Federal Transit Administration's 49 CFR part 27, 37 and 38.
- Conduct outreach when necessary to care givers or human service agencies to provide appropriate transportation services for individuals having difficulty using The COMET transportation services
- Identify areas of training needing modifications based on incident trends, new regulations or feedback from employees

Contractor General Manager

- Provide oversight and management of all COMET contracted services
- Communicate with COMET management on a regular basis to update on services provided
- Work with management staff to address identified safety risks or hazards
- Oversee safety mitigation strategies
- Ensure a high level of system safety in all departments
- Conduct weekly management meetings to discuss safety and performance of COMET services

Contractor Safety and Training Manager

- Identify training programs needing modifications based on trends, regulation changes or Best Practices found through communications with local, State and Federal subject matter experts
- Ensure employees are performing to the training standards
- Ensure all trained employees are trained to proficiency
- Track, document and maintain all safety information
- Ensure all employees are current on training certifications, refresher training programs and new policy training
- Coordinate with Operations and Maintenance Departments on training needs
- Initiate, maintain and modify Safety Management System principles as needed to ensure the Public Transportation Agency Safety Plan (PTASP) is being followed by all contracted employees
- Facilitate monthly safety committee meetings and convene the committee if a safety event occurs and immediate mitigation strategies are necessary

The COMET's Director of Operations

- Work closely with Customer Service Representatives to identify safety and customer service issues needing immediate action
- Review safety data entering through Customer Service feedback opportunities like social media, direct contact, phone comments and surveys
- Design surveys to identify the passenger's experience
- Ensure all aspects of the contracted services are following the clearly defined contract with The Comet
- Provide monthly reports to The COMET on customer service data

44 Employee Safety Reporting Program

The COMET, in addition to its internal Employee Safety Reporting Program, will require all contractors to develop an Employee Safety Reporting Program that applies to staff associated

with The COMET. The COMET as part of its oversight, will require reporting data on a monthly basis as part of the required performance and safety data reports.

All hazards reported through the Employee Safety Reporting Program go straight to the Chief Safety Officer for review, assessment, investigation, mitigation and follow-up. If the hazard directly impacts the working relationship between two or more employees, the Chief Safety Officer will ensure no retaliation or hostile work environment will take place. The COMET and its contractors will ensure that no action will be taken against any employee who discloses a safety concern through the respective Employee Safety Reporting Program unless the employee engaged in the following:

- Willful participation in illegal activity, such as assault or theft;
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk; or
- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances.

The COMET's Employee Safety Reporting Program encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the daily Operations Log.
- Report conditions anonymously via locked comment box in the driver area.
- Report conditions directly to any supervisor, manager, or director.

Examples of information typically reported include:

- Safety concerns in the operating environment (for example, county or city road conditions or the condition of facilities or vehicles);
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection);
- Events that senior managers might not otherwise know about (for example, near misses); and
- Information about why a safety event occurred (for example, radio communication challenges).

Section 5. Safety Risk Management

51 Safety Risk Management Process

The Safety Risk Management process will utilize hazard identification, hazard assessment, and hazard mitigation methods and processes to ensure an awareness of hazards and the implementation of step or eliminate and/or control the hazards.

52 Safety Hazard Identification

Any contractors operating transit services for The COMET shall have risk management policies, procedures and processes in place to identify, assess and mitigate hazards. Any hazard identified is properly documented and provided to The COMET if needed as part of the monthly data collection process. Should an accident or incident with injury occur, the contractor will notify The COMET immediately and follow-up with proper documentation as required by the contract, local, State and Federal guidelines.

Documents related to risk management and monitoring are included in periodic site reviews. The COMET ensures all safety events are properly identified, assessed, investigated and mitigated. Each contractor has a process of conducting a root cause analysis and the results are conveyed to The COMET with information on each event. As part of the periodic inspections performed by the Safety Management System Executive and The COMET oversight personnel, safety event documentation is reviewed for Safety Management System process of risk management.

The following are the methods and processes the contractor will use to identify hazards and consequences to hazards.

Inspections are conducted and are an important source of information about hazards. Results from these inspections also help identify areas where mitigations designed and adopted to manage safety risks are not being carried out as required. Inspections include personnel, vehicles, facilities and data that identify potential safety concerns or potential safety events. Inspections focus on the following:



- Compliance with rules and regulations, which may identify:
 - Non-compliance with safety rules
 - Challenges in complying with safety rules, and
 - Emerging practices
- Operations personnel fitness-for-duty checks, which may identify:
 - Impairment
 - Fatigue
 - Attentiveness
 - Absence of corrective lenses
 - Apparent injuries, and
 - Uniform or equipment issues
- Radio or digital communication checks, which may identify defective equipment, low or no signal zones, or employee procedures not being followed
- CDL and operator citation checks, which may identify driver non-compliance with driving regulations and requirements
- Pre- and Post-trip inspection, which may identify vehicles being used without proper inspections to identify safety defects
- Vehicle inspection, which may identify a series of defects in components and part with the potential to impact the safety performance of the vehicle
- Facility inspection, which may identify conditions with the potential to impact the safety of employees, passengers or the public

Inspections conducted include:

- Facility Inspections — Routine facility inspections will be conducted monthly by the Contractor's Facility and Vehicle Maintenance Manager to identify hazardous conditions of the facilities and hazardous behaviors of the employees. The inspections will be documented in writing and reported to the Chief Safety Officer.
- Bus Stop Inspections — Bus stops, including COMET's Super Stops, will be inspected at least monthly to identify unsafe conditions and Americans with Disabilities Act (ADA) compliance issues. The inspection will be documented in writing and shared in a summary

report to the Contractor Facility and Vehicle Maintenance Manager and Chief Safety Officer. Operators will be responsible for notifying dispatch if they notice a hazard at any stop.

- Pre-Trip and Post-Trip Inspections — Pre-Operation vehicle inspections are conducted before each vehicle enters revenue service. The Pre-Trip inspection requires the operator to conduct a systematic inspection of the interior, exterior and mechanical operations of the vehicle. Maintenance staff is availability is a safety, mechanical or cleaning defect is found. The maintenance staff will determine if repairs can be made without disrupting service or if a replacement vehicle will be provided. Post trip inspections are required and are meant to document any issues experienced with the vehicle during revenue service. All Pre and Post Inspections are reviewed by the maintenance department daily.
- Routine Preventive Maintenance Vehicle Inspections — Preventive maintenance inspections are conducted based on mileage and manufacture intervals. The inspections follow manufacturer’s guidelines and provide an opportunity to identify mechanical degradation, replace parts, identify safety hazards, and ensure the vehicle is ready for revenue service. Any hazards identified are reported on inspection documents and deficiencies are corrected or the vehicle is placed out of service until corrections can be made.

Other hazard identification methods include:

- Results of the annual Transit Asset Management Condition Assessments — Facilities, rolling stock and equipment are inspected annually as part of the update to The COMET’s Transit Asset Management (TAM) Plan as required by the Federal Transit Administration’s 49 CFR Part 625. The Contractor’s Facility and Vehicle Maintenance Manager will conduct the assessments to ensure the COMET fleet is in a State of Good Repair (SGR) and per the Federal Transit Administration regulation and The COMET’s Transit Asset Management Plan. Results from these assessments will be provided to The COMET’s Management Team.
- Employee Observations — Through The COMET’s Employee Safety Reporting Program, Safety Committee meetings, training programs and open door policies, the contractor will document, assess and mitigate safety risks identified by employees.
- Federal Transit Administration (FTA) Notices and Announcements — The contractor’s Safety and Training Manager will monitor updates, best practices and training opportunities through the Federal Transit Administration’s Office of Safety and Security web notification process. The notification process provides information on safety trends across the country and provides remedies to trending safety hazards.
- Transit Industry Peer Information — The contractor will maintain information sharing with local, State and National transportation peers to share ideas and solutions to safety issues affecting transit systems. This includes participation in the Transportation Association of South Carolina (TASC), interaction with South Carolina Department of Transportation, and South Carolina transit systems. On a National level, the contractor and The COMET employees will monitor information relative to transit safety through American Public Transit Association (APTA), Community Transportation Association of America (CTAA), National Transit Institute (NTI), Transportation Safety Institute (TSI) and National Transportation Safety Board (NTSB).
- Customer Feedback — The contractor and The COMET’s Operations Director will share information on safety and performance complaints and document these complaints for mitigation and analysis.

- Near Miss Reports — Employees will be encouraged to report near miss incidents utilizing the Employee Safety Reporting Program, Hazard Reporting Form or Incident Report. These incidents will be investigated and analyzed for trends or isolated occurrences. Subject matter experts may be called upon to assist in mitigating a hazard based on the near miss.
- Workers Compensation Claims — The COMET and its contractor will monitor Workers Compensation Claims to identify trends, conduct root cause analysis and develop mitigation strategies to create a safer working environment for The COMET and contract employees.
- Safety Event Data — The COMET's contractor will document and summarize safety events monthly as part of the contract with The COMET, but also to conduct analysis on trending safety data which may be indicators of safety risk.

Contractors will provide a safety committee to review all safety events, perform root cause analysis, review mitigation strategies and make safety recommendations to The COMET. In addition, contractors will schedule and conduct monthly safety meetings to communicate current safety concerns, provide feedback on existing mitigation actions taken as a result of safety event or concern and share safety and training information.

The COMET has safety policies and procedures in place in cases of incidents or accidents, and a reporting process with designated forms for contractors to follow if there is a safety event or hazard identified.

The contractor's dispatch has a reporting process in place to document safety and security events, passenger complaints, fare disputes and any other situation outside of normal operating activities. The dispatch daily shift reports are meant to document these events and provide the ability for internal and external follow-up. Follow-up includes outcomes, employee response, and supervisor action.

Using Safety Management System principles, the Dispatch Report is used to identify a risk or hazard and then sent to Chief Safety Officer for review, assessment, investigation and follow-up. Once an internal investigation is completed by the contractor the report is sent to The COMET's Accountable Executive and SMS Executive for further assessment.

53 Safety Hazard Assessment

As part of the accident investigation, incident investigation or hazard identification process, an assessment will be conducted to determine the level of potential threat or hazard requiring immediate, delayed or monitoring response. Each event assessment will include a determination of the likelihood of the event being repeated. If there is a potential for repeated safety events or hazards, The COMET and its contractors will review areas of the system to modify to reduce risk. In some cases, it may be as simple as a training modification, but in other cases it may extend to policies, procedures, processes or personnel. The following tables indicate how the agency can assign values and measure risk to ascertain the severity and probability of operational hazards.

Table 1. Initial Assessment of Hazard

Initial Assessment of Hazard		
	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.	
Likelihood of re-occurrence of this hazard (1–10)		

Table 2. Severity Categories

SEVERITY CATEGORIES		
Description	Severity Category	Mishap Result Criteria
Catastrophic	1	Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10 million.
Critical	2	Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1 million but less than \$10 million.
Marginal	3	Could result in one or more of the following: injury or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100,000 but less than \$1 million.
Negligible	4	Could result in one or more of the following: injury or occupational illness not resulting in a lost work day, minimal environmental impact, or monetary loss less than \$100,000.

Table 3. Probability Levels

PROBABILITY LEVELS			
Description	Level	Specific Individual Item	Fleet or Inventory
Frequent	A	Likely to occur often in the life of an item.	Continuously experienced.
Probable	B	Will occur several times in the life of an item.	Will occur frequently.
Occasional	C	Likely to occur sometime in the life of an item.	Will occur several times.
Remote	D	Unlikely, but possible to occur in the life of an item.	Unlikely, but can reasonably be expected to occur.
Improbable	E	So unlikely, it can be assumed occurrence may not be experienced in the life of an item.	Unlikely to occur, but possible.
Eliminated	F	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.

Table 4. Risk Assessment Table

RISK ASSESSMENT MATRIX				
Likelihood/ Severity	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	High	Medium
Probable (B)	High	High	Medium	Medium
Occasional (C)	High	Medium	Medium	Low
Remote (D)	Medium	Medium	Low	Low
Improbable (E)	Low	Low	Low	Low

Table 5. Safety Risk Index

Safety Risk Index	Criteria by Index
High	Unacceptable — Action Required: Safety risk must be mitigated or eliminated.
Medium	Undesirable — Management Decision: Executive management must decide whether to accept safety risk with monitoring or require additional action.
Low	Acceptable with Review: Safety risk is acceptable pending management review.

54 Safety Risk Mitigation

The COMET currently mitigates risk as it happens in coordination with its contractors. Actions taken might include route changes due to construction or ensuring that there is a spare bus at SuperStop or COMET Central. These actions are taken as a result of identifying potential risk to employees or passengers and preparing for the likelihood of an accident resulting in service disruption.

The COMET's Service Planning Committee is responsible for conducting route analysis and reviews for determining safety and performance. All route or service reviews must be documented properly to include safety elements. The Service Planning Committee meets monthly to study data related to route performance.

Safety Management System principles dictate that transit employees must document when mitigation actions are taken. Documentation is essential to understanding whether actions taken were appropriate to the level of risk or if additional actions are necessary. By documenting hazards, hazard assessments/investigations and mitigation actions, The COMET is collecting information to analyze trends and effective responses. It is also required as part of the safety performance target development mentioned in Section 3.

Section 6. Safety Assurance

6.1 Monitoring Compliance Activities

The COMET has monitoring practices in place for Federal and State compliance, including 49 CFR Part 673. A process for determining effectiveness of the Agency Safety Plan includes the collection of data for analysis to determine trends. The transit system currently collects data on safety events like accidents and incidents. Various software programs are used to monitor safety in Maintenance, Operations, Customer Service, Training and Human Resources areas. Those programs include:

- M Pulse — tracks facility maintenance and inspections;
- LYTX — identifies driving characteristics;
- Apollo Camera — Surveillance camera system used in investigations;
- Strategic Mapping — alerts drivers to detours or delays;
- ReFlex Route — coordinates service for deviated fixed route service; and
- Solutions for Transit Software — captures operations data.

The Chief Safety Officer is responsible for reviewing all safety events, mitigation strategy, reviewing events and recommending any necessary disciplinary action. They work closely with all departments and communicates well. The Chief Safety Officer is not only responsible for internal reporting to the contractor and local operator, but also for external reporting to The COMET's Accountable Executive and SMS Executive.

The Service Planning Committee is responsible for monitoring and modifying routes, primarily for performance reviews. Safety elements added to the existing service performance review allows safety data to be collected with route proposals or modifications.

The COMET uses a private security firm, New Age Protection to monitor safety and security on fixed routes, ADA paratransit, COMET Central, SuperStops, bus stops and Lowell C. Spires Jr. Regional Transit Facility to provide security for the system. The officers may wear uniforms or dress in plain clothes. They help to monitor system safety and security and have the ability of immediate response if an event occurs.

Customer service representatives monitor incoming customer feedback and if safety issues are presented, the customer service representative forward the documented customer feedback to the appropriate department using Solutions For Transit Software, for further investigation. Passengers may also voice any safety concerns through the Midlands Transit Riders Association which works closely with The COMET to improve all aspects of the system through customer feedback.

62 Monitoring Service

The COMET collects performance and safety data from both its contractors as required per each contract. The data includes safety performance targets as required by the Federal Transit Administration's National Transit Database and South Carolina Department of Transportation. The Accountable Executive evaluates this information to identify trends in performance and safety. If anomalies are noted in the data, contact with the contractor will be made by The COMET and Safety Management System Executive to identify the cause of the variance.

The monthly performance and safety data collected include:

- Passenger Counts by Route by Day;
- Total Revenue Hours and Miles;
- Total Vehicle Hours and Miles;
- Accident Log (Preventable/Non-Preventable) (AFR);
- Employee Injuries (IFR);
- Complaints (Valid/Invalid);
- Road Calls (Vehicle Breakdowns that Require Maintenance to Scene and/or Towing);
- Monthly National Transit Database Report to include the following:
 - Fatalities
 - Injuries
 - Safety Events
 - System Reliability (Major Mechanical Failures)
- Vehicle Inspection Report (Maintenance and Daily Vehicle Inspection Reports); and
- Facility/Equipment Inspection.



The COMET uses Solutions For Transit Software to track these data points and conduct analysis to identify trends. Using a proactive and analytical approach, The COMET will maintain data in various safety event categories similar to the required monthly data submitted by the contractor, to focus on areas of safety showing a rise in certain events. Upon determining an increase in a particular area, The COMET will convene the Service Planning Committee or the contractor's Safety Committee, its management and/or key contractor staff to develop solutions and mitigation strategies to remove or reduce the risk.

63 Investigation of Activities

The Director of Operations and associated staff will establish and carry out a schedule of regular safety inspection tours of all The COMET facilities. The main purpose of these safety inspections will be to bring to light any unsafe conditions or acts that might exist and to effectuate corrective action before an accident occurs. Regular dialogue will take place between The COMET and contractor management as both organizations share the same facility.

The Director of Operations will make a written report of their findings. Each such report will be reviewed by the Accountable Executive.

The contractor will conduct daily, monthly and annual reviews of employees, assets, policies, procedures, training and processes to ensure they are meeting the intent of Safety Management System principles and The COMET safety policies and performance. These safety reviews include but are not limited to the following.

- Vehicle Pre/Post trip inspections;
- Facility reviews including shelters, transfer points, bus stop signs, maintenance facility; administrative facility, storage and parking area;
- Preventive maintenance program;
- Employee evaluations – video review, ride along assessment, follow-along assessment;
- Policy and procedure reviews;
- Fire Marshall and/or OSHA review;
- Assessment of technology;
- Review and monitoring social media compliments and complaints;
- Threat and vulnerability assessments;
- Route evaluations for safety and performance — new and existing; and
- Training program effectiveness.

The COMET has established safety performance goals within its contracts and will maintain accurate performance and accident records. These goals and records will be reviewed regularly and appropriate action taken as a measure of managerial and supervisory proficiency. The Accountable Executive will be responsible for reviewing all accident and investigation reports as they occur within 24 hours of the incident.

All accidents will be investigated thoroughly regardless of severity through root cause analysis conducted by contractors and The COMET's Administration and Operations staff. Information derived from investigation and analysis may lead to changes in policy, procedures or processes to mitigate or reduce future occurrences.

The COMET maintains emergency preparedness plan providing guidance to employees and contractors through its Disaster Preparedness Plan and Emergency Communications Plan. In the event of an emergency/disaster related to a nuclear disaster (VC Summer Plant), Homeland Security, or other local, State, or Federal declared emergency/disaster situation, The COMET will direct all emergency/disaster responses to the Richland or Lexington Counties Emergency Preparedness Teams, the State of South Carolina Office of Emergency Preparedness, or Federal Emergency Management Agency.

The COMET serves as ESF-1 Transportation Provider in its role as a member of the Richland and Lexington Counties Emergency Preparedness Teams and follows all guidance and procedures as prescribed by the local team. The primary person at The COMET for contracting the Richland and

Lexington Counties Emergency Preparedness Team is the Director of Operations.

64 Management of Change

As a small public transportation operator, The COMET does not need to report on Management of Change.

65 Continuous Improvement

As a small public transportation operator, The COMET does not need to report on Continuous Improvement.

Section 7. Safety Promotion

71 Safety Training

Training programs for the contractor relate to safety, policies, procedures, Federal, State and local regulatory compliance and performance monitoring related to efficiency, productivity, and safety. The contractor also provides thorough new hire training and remedial/refresher training. Additionally, contract employees receive training from outside organizations like local first responders as well as Federal, State and local training programs.

As part of the annual training curriculum, and as required by contract, The COMET will require the contractor to be flexible to include additional or replacement training based on current safety trends requiring new or revised training as part of the safety mitigation strategy. As mentioned in Section 6, trends in safety data through safety performance measurement will allow The COMET and its contractors to identify if there is an upward trend in a particular safety category and respond with appropriate training to prevent incidents from occurring.

Training files are included in periodic site reviews by The COMET's Operations Department to ensure training programs are kept current and are relative to current events or trends in safety. All contracted employees must meet The COMET training requirements and achieve proficiency before operating in revenue service without supervision. Additional evaluations above and beyond normal frequency will be conducted on new employees or employees required to take remedial training to ensure they are performing to the training standard. If not, additional training or counseling may be conducted or terminated if all methods have been exhausted.

A complete list of training provided by The COMET for its employees is located in The COMET Safety Policy in the Appendix of this Plan.

72 Safety Communication

The COMET displays information relating to safety warnings in various locations for easy employee visibility, including breakrooms, dispatch areas and in garages. Transloc software allows dispatch to notify drivers of identified in-service hazards.

Any changes made to policies, procedures or processes is distributed to all employees and contractors impacted by the change. In turn, training programs, employee handbooks and all

relevant documents, including policies or procedures, are updated to reflect the change. If the change is considerable, The COMET may choose to train employees and contracted employees prior to release of the change to ensure employees understand the change.

The COMET or its contractors will notify their employees of policy, procedure or process changes through various methods including but not limited to the following:

- Memorandum;
- Bulletin board posting;
- Training; and
- Electronic notification process, such as emails.

Weekly or monthly contractor meetings and Safety Committee meetings are also used to convey hazard or safety issues that have been identified with mitigation actions being taken. Minutes of the meeting are taken, and both The COMET Administration & Operations staff and contractor management staff attend. The meetings are meant to discuss safety event response, mitigation analysis, trend analysis and safety performance measures.



Section 8. Additional Information

This Public Transportation Agency Safety Plan was developed from information in The COMET and contractor documents, and policies and procedures manuals. Those documents are listed below:

Document	Date of Completion
Central Midlands Regional Transit Authority Safety Policy	February 26, 2020
The COMET SMS Development Plan 2020	January 2020
Customer Comment Procedure	October 2019
Disaster Preparedness Plan	September 5, 2019
Emergency Communications Plan	October 2019
System Security and Emergency Preparedness Program Plan (SSEPP)	October 1, 2019

Section 9. Definitions of Terms Used in the Safety Plan

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. (per § 673.5)

Accountable Executive (AE) 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. (per § 673.5 Definitions)

The transit agency must identify an Accountable Executive. The Accountable Executive is accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's public transportation system. The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive. (per § 673.23(d)(1))

Chief Safety Officer/SMS Executive means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

Safety Management System (SMS) Executive means a Chief Safety Officer or an equivalent. (per § 673.31)

The Accountable Executive must designate a Chief Safety Officer or SMS Executive who has the authority and responsibility for day-to-day implementation and operation of an agency's SMS. The Chief Safety Officer or SMS Executive must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer or SMS Executive. (per § 673.23(d)(2))

Consequences are outcomes or what those conditions can cause. Transit agencies should assess the likelihood and severity of the consequences of a hazard, not of the hazard itself (per § 673.5)

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. (per § 673.5)

Event means any Accident, Incident, or Occurrence. (per § 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. Hazards are conditions. (per § 673.5)

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. (per § 673.5)

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. (per § 673.5)

National Public Transportation Safety Plan (NPTSP) 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. (per § 673.5)

Operator of a Public Transportation System means a provider of public transportation as defined under 49 U.S.C. 5302(14).

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. (per § 673.5)

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. (per § 673.5)

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. (per § 673.5)

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard. (per § 673.5)

Risk Mitigation means a method or methods to eliminate or reduce the effects of hazards. (per § 673.5)

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. (per § 673.5)

Safety Event means any Accident, Incident, or Occurrence. (per § 673.5)

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. (per § 673.5)

Safety Management System (SMS) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards. (per § 673.5)

Safety Performance Target means a performance target related to safety management activities. (per § 673.5)

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. (per § 673.5)

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. (per § 673.5)

Safety Risk Management means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk. (per § 673.5)

Serious Injury means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface. (per § 673.5)

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.

Section 10. 2020 NTD Safety & Security Quick Reference Guide — Non-Rail Mode Reporting

Reportable Event: A safety or security event occurring: on transit right-of-way or infrastructure, at a transit revenue facility, at a maintenance facility or rail yard, during a transit-related maintenance activity, or involving a transit revenue vehicle. Excluded from this event reporting requirement are events that occur off transit property where affected persons, vehicles, or objects come to rest on transit property after the event, OSHA events in administrative buildings, deaths that are a result of illness or other natural causes, other events (assault, robbery, non-transit vehicle collisions, etc.) occurring at bus stops or shelters that are not on transit-controlled property, collisions that occur while traveling to or from a transit-related maintenance activity, collisions involving a supervisor car, or other transit service vehicle operating on public roads.

Alaska (AR) and Commuter rail (CR) modes report only SECURITY events that meet a Major event threshold.

S&S-40 Major Event Report	S&S-50 Non-Major Monthly Summary
MAJOR THRESHOLDS	NON-MAJOR THRESHOLDS
<p>An event meeting the reportable event definition AND meeting one or more of the following reporting thresholds:</p> <ul style="list-style-type: none"> • A fatality confirmed within 30 days (including suicide) • An injury requiring transport away from the scene for medical attention for one or more persons (partial exception in the case of Other Safety Events) • Estimated property damage equal to or exceeding \$25,000 • An evacuation for life safety reasons • Collisions involving transit roadway revenue vehicles that require towing away of a transit roadway vehicle or other non-transit roadway vehicle <p>Reports are due within 30 days of the date of the event.</p>	<p>Less severe Other Safety Occurrence Not Otherwise Classified (OSONOC) injuries meeting the reportable event definition that are NOT a result of a collision, evacuation, security event, hazmat spill, or Act of God, and non-major fires.</p> <p>Other Safety Occurrence Not Otherwise Classified (OSONOC):</p> <ul style="list-style-type: none"> • Single injury event requiring transport away from the scene for medical attention (<i>do not report “minor” collisions on S&S-50</i>) <p>Fires:</p> <ul style="list-style-type: none"> • Requiring suppression that do not meet a major incident reporting threshold <i>injury, fatality, evacuation, or property damage of \$25,000 or more.</i> <p>Reports due by the end of the following month (e.g., January data due by end of February)</p>

S&S-40 Major Event Report	S&S-50 Non-Major Monthly Summary
EVENT TYPES	EVENT TYPES
<ul style="list-style-type: none"> • Collision (including suicide/attempted suicide) • Fire • Hazardous material spill (requires specialized clean-up) • Acts of God (nature) • System security: <ul style="list-style-type: none"> • Arson • Bomb threat/bombing • Burglary / Vandalism • Chemical/biological/radiological/ nuclear release • Cyber security event • Hijacking • Sabotage • Suspicious package • Other security event (shots fired, projectiles, etc.) • Personal Security: <ul style="list-style-type: none"> • Assault • Homicide • Suicide or Attempted Suicide (no transit vehicle involved) • Robbery • Larceny/theft • Motor vehicle theft • Rape • Other personal security events (perpetrator tazing) • Other Safety Occurrences Not Otherwise Classified (OSONOC) (two injuries and/or another threshold) <ul style="list-style-type: none"> Miscellaneous events that meet a threshold 	<p>Other Safety Occurrence Not Otherwise Classified (OSONOC):</p> <p>Injury due to:</p> <ul style="list-style-type: none"> • Slip/Trip • Fall <ul style="list-style-type: none"> • Including person making contact with a non-moving transit vehicle • Injury to maintenance workers • Boarding/alighting • Abrupt or evasive transit vehicle maneuvers • Mobility device (e.g. wheelchair) securement issues • Injury sustained on a mobility device lift • Stairs/elevator/escalator injury <p>Fire:</p> <ul style="list-style-type: none"> • Requires suppression but no major threshold is met • Small fire on in transit station • Small engine fire on transit vehicle

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Appendix A: SMS Development Plan

Safety Management Systems (SMS) Development Plan



January 2020



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1.0 Introduction

Central Midlands Regional Transit Authority (The COMET) is a Tier II Transit Agency operating less than 100 peak buses in revenue service. In January 2020, The COMET contracted with RLS & Associates, Inc., to develop The COMET's Agency Safety Plan in order to comply with the Federal rulemaking issued by the Federal Transit Administration (FTA) related to transit safety. The rule, 49 CFR Part 673: Public Transportation Agency Safety Plan, is required of all public transit operators receiving funding through FTA Section 5307 and requires the operators to develop an Agency Safety Plan to be certified by the South Carolina Department of Transportation (SCDOT) by July 20, 2020.

In an effort to gain a better understanding of the safety policies and processes in place within The COMET's public transportation system, RLS was tasked with conducting a Safety Management Systems assessment. The assessment included document reviews, on-site interviews with key safety staff, and round table discussions of existing safety practices and enhancements needed to comply with the FTA rule.

A key element to the FTA rule is a practice adopted from the airline industry called Safety Management System, which focuses on accountability, resources to risk, risk management processes and an overall culture of safety. The assessment evaluated existing practices to determine gaps with Safety Management System practices and to make recommendations for changes to policies and processes. The following report serves as a road map for the development of the Agency Safety Plan, and is organized within the same framework suggested by the FTA for the development of an Agency Safety Plan.

Beginning January 16, 2020, RLS staff met for two days with The COMET's management and safety staff. The meeting began with a presentation of the FTA rule, Safety Management System, and risk management

principles for transit. The meeting was attended by an SCDOT representative to observe, provide clarification, and to provide content support.

The following sections were developed to mirror the framework for Phase II of the Agency Safety Plan, to be developed from this assessment as well as from The COMET and its contractor's staff feedback.

(Note: For clarification, and for purposes of this document, Safety Management System refers to FTA's overarching program of a comprehensive and collaborative approach to managing safety. Public Transportation Agency Safety Plan refers to FTA's overarching safety plan requirements, while Agency Safety Plan refers to the Agency Safety Plan for The COMET).

2.0 Assessment of Current Safety Management System Capabilities

As part of the Safety Management System assessment process, RLS conducted a series of interviews and facilitated a series of discussion with The COMET executives, department managers, and front-line employees about existing risk-management processes. Additionally, RLS reviewed existing policies, procedures and practices for managing safety for employees, riders and the public provided by The COMET.

The following sections are structured similar to the FTA's Public Transportation Agency Safety Plan Template for Bus Transit and the Public Transportation Agency Safety Plan Checklist for Bus Transit, and will be the base structure for the Agency Safety Plan.

3.0 Safety Performance Targets

The Agency Safety Plan specifies performance targets, as defined by § 673.5, for:

- Fatalities: Total number of reportable fatalities and rate per total vehicle revenue miles, by mode.
- Injuries: Total number of reportable injuries and rate per total vehicle revenue miles, by mode.
- Safety Events: Total number of reportable events and rate per total vehicle revenue miles, by mode (Event, as defined in § 673.5).
- System Reliability: Mean (or average) distance between major mechanical failures, by mode.

The Agency Safety Plan specifies or references documentation that specifies:

- Performance targets are made available to the State to aid in the planning process.
- Performance targets are made available to the Metropolitan Planning Organization(s) (MPO) to aid in the planning process.
- Coordination with the State and MPO(s) in the selection of State and MPO safety performance targets, to the maximum extent practicable.

The COMET currently collects data on accidents, incidents, workers compensation claims, and hazards. Hazard information is collected but there is no specific form used and hazards have minimal classifications to allow for detailed trend analysis. Safety data will need to be collected for safety performance targets. RLS will provide a simple spreadsheet program to enable the Chief Safety Officer to collect the data required to complete the four required targets as defined below.

Sample Method of Collecting Safety Performance Targets

Safety Performance Targets (SPT)s	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Annual Total
Type of Safety Event					
Fatality	1	0	0	0	1
Injury	6	5	6	4	21
Property Damage	5	3	1	1	10
Evacuation	0	1	0	0	1
Collision Tow-away	2	5	1	3	11
Total Safety Events	14	14	8	8	44
Total Vehicle Rev. Miles	150,000	152,000	125,000	134,000	561,000
Major Mechanical Failures	7	7	8	5	27
Mileage Increment for SPTs	100,000	100,000	100,000	100,000	100,000
Performance Measures	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Annual Avg.
Fatality	0.667	0	0	0	0.17
Injury	4.00	3.29	4.80	2.99	3.77
Safety Event	9.33	9.21	6.40	5.97	7.73
System Reliability	21,428.57	21,714.29	15,625.00	26,800.00	20,778.78

Recommendations: The COMET should implement use of the spreadsheet provided by RLS for inputting the required data. When developing targets, The COMET must take into consideration the following attributes that may impact target development:

- New vehicles or facility(s);
- Changes in training programs;
- Changes in the process of employee evaluation, asset review, and process review; and
- Growth in service (increased number of routes, new service modes).

4.0 Safety Management Policy Statement

The Safety Management Policy establishes the organizational accountabilities and responsibilities necessary for implementing Safety Management System. The policy must identify an Accountable Executive, a Chief Safety Officer or SMS Executive, as well as agency leadership, executive management, and key personnel who will be responsible for carrying out Safety Management Systems. The policy must also include a policy statement that articulates safety goals and objectives based on the agency's unique needs, and details a process allowing employees to report safety conditions to senior management without fear of reprisal. Additionally, the policy statement must be communicated throughout the organization, including the Board of Directors (or equivalent authority), and be readily available to all employees and contractors.

4.1 Written Statement of Safety Management Policy, and Safety Objectives.

The COMET has an Safety Management Policy, The Central Midlands Regional Transit Authority Safety Policy, dated February 26, 2020 addressing accountability, system objectives and importance of risk management. In addition, The COMET has a

System Security and Emergency Preparedness Program Plan (SSEPP) dated October 1, 2019 covering security responsibilities and The COMET's role in emergency events.

Recommendations: The COMET should modify their Safety Policy to include the following required in FTA's Safety Management Policy:

- Describe The COMET's commitment to Safety Management System and the dedication of resources (e.g., people and funds) to support it,
- Must be signed by the Accountable Executive, whom is presently the Executive Director/CEO.

4.2 Employee Safety Reporting Program

Employee safety reporting program, that includes:

- *A process that allows employees to report safety conditions to senior management,*
- *Protections for employees who report safety conditions to senior management, and*
- *A description of employee behaviors that may result in disciplinary action, and therefore are excluded from protection.*

The COMET's contractor has a Fixed Route Operator Manual and DART Operator Manual explaining the steps to take by employees if they have a complaint about a policy or workplace issue, but does not go into detail about retaliation, penalty of false claims. The existing contractor policy is below.

20. Complaint Resolution Procedures

A formal complaint can be defined as a condition of employment or application of a policy that the Operator believes to be unjust of [sic] prejudiced.

Anytime [sic] an employee talks in a critical, complaining fashion, them [sic] may be stating a complaint. Often, the complain is being discussed among several employees.

Generally, the topics center around their pay; unsatisfactory elements of their job; what other companies are doing; physical surroundings; excess noise, and so forth. Veolia wants to try and solve problems or issue [sic] before they worsen. If we ignore the problem, it will grow. If you are unable to resolve an issue, notify you supervisor or manager and seek help resolving it.

Formal complaints will be resolved in the following manner:

To resolve a complaint or problem that has not been resolved informally you are first encouraged to seek assistance from your immediate Supervisor. Supervisors are responsible for handling complaints as important business matter, and they will attempt to arrive at a prompt and equitable solution.

Alternative Channels

Occasionally, a complaint involves an Operator's Supervisor. Transdev recognizes that employees may not feel free to express such concerns to them. Therefore, employees are encouraged to discuss complaints with the next higher level of management to avoid an awkward situation. As an alternative, the employee may discuss the complaint at any time with the Human Resources Manager. An employee may ask the Human Resources Manager, or another employee or another manager to be present when the complaint is discussed.

Appeals

If the Operator's complaint is not settled satisfactorily with the immediate supervisor, you are encouraged to appeal the complaint to the next higher level or management. The Company expects Supervisors to support this appeal process to help resolve any remaining dissatisfaction.

The Operator may appeal a complaint through succeeding levels of management all the way to the General Manager if desired.

The General Manager will render a final decision on the matter after appropriated [sic] investigation.

Currently, The COMET uses Accident and Incident forms to describe safety events, but there is no process for identifying hazards or potential risks. Safety hazards come in many forms and a process should include safety hazards in the following areas:

- Safety hazards in operating environment
- Policies and procedures that may put employees at risk
- Events or actions taking place not otherwise known to senior managers
- Information about why a safety event occurred

Recommendation: A formal employee safety reporting policy should be implemented to protect employees from hazardous reporting which could result in retaliation. Along with the policy, a process must be developed for pro-active hazard identification by employees. This process would complement or replace existing complaint policies currently in-place with contractors. The process must include the following elements:

- Single non-retaliation policy included as part of an Employee Safety Reporting Program
- Name of Employee, Date, Time, Location/Route, Service Type (Fixed Route, Demand Response)
- Type of hazard
- Assessment and investigation of hazard
- Mitigation actions
- Potential to repeat
- Follow-up to determine if mitigation is effective
- Accessibility of Employee Hazard Reporting Form (locations of form)
- Training for process
- Reporting chain
- Data collection, reporting and analysis

The COMET collects information on safety events but complete documentation of

the Safety Management System process is located in Operations, Human Resources, and Safety areas instead of in a centrally located, comprehensive guide with a dedicated file. This issue can be easily remedied by creating a form that can be digitized and shared through Google docs, allowing each department to add their information into a common document with all relevant information attached. Once the Safety Management System process is complete, the document can be properly filed to allow access for future review and/or trend analysis.

4.3 Communication of the Safety Management Policy

The safety management policy must be communicated throughout the agency's organization.

The COMET communicates policies, procedures or practices — including directives issued by the contractor — to employees via acknowledgment-required bulletin board notices, tablet safety blitzes (for immediate information of potential risk or safety information), all calls and safety meetings.

The COMET conducts monthly safety meetings and training for Operations staff, including all drivers. These meetings provide safety updates and new or refresher trainings. Trainings are based on needs identified in the previous month's safety events, as well as standard refresher training through the contractor's training programs.

The COMET has an informal Service Planning Committee that meets monthly to discuss safety, performance, and customer service. The Service Planning Committee is made up of The COMET Planning and Development, Administration, Operations, Accountable Executive and contractor's managers, operators, dispatchers, road supervisors, and maintenance personnel. These meetings help evaluate safety through trend analysis, management observations, and safety reports. Meeting results may impact current

Safety Management System processes or policies and procedures to be shared with all employees.

Contracted service providers provide a Safety Committee to review all safety events, perform root cause analysis, review mitigation strategies and make safety recommendations to The COMET. In addition, service contractors will schedule and conduct monthly safety meetings to communicate current safety concerns, provide feedback on existing mitigation actions taken as a result of safety event or concern and share safety and training information.

Recommendation: Once finalized, the updated Safety Management Policy should be shared through the Service Planning Committee, contractor's Safety Committee and through direct communication with all transit employees. During quarterly safety meetings, Maintenance staff should be participating to ensure they are kept up to date on all safety related information and participate in any other relevant training.

4.4 Authorities and Accountability

Authorities, accountabilities, and responsibilities necessary for the management of safety, as they relate to the development and management of the transit agency's Safety Management System (SMS), for the following individuals.

Accountable Executive

The COMET is currently led by Executive Director/CEO, John Andoh. Mr. Andoh is the designated Accountable Executive by the Board of Directors.

SMS Executive

The SMS Executive will serve as an intermediary between the contractor's Chief Safety Officer and The COMET's Accountable Executive. The position requires oversight and interaction with contract operations,

maintenance, human resources, training and safety to ensure the Agency Safety Plan is being followed and a culture of safety is present among all contract employees.

Chief Safety Officer

The Chief Safety Officer for the transit operation's contractor will report to The COMET SMS Executive, and the contractor's General Manager to ensure that both The COMET and the transit operations contract executive management are engaged and aware of safety issues. The Chief Safety Officer will be responsible for ensuring the Agency Safety Plan is followed by all contract employees and Safety Management System principles are in place.

Executive Management and Key Staff

The COMET has identified other leadership positions to be involved with implementation of the Agency Safety Plan to include:

The COMET

- Executive Director/CEO
- Director of Administration and Operations/COO
- Paratransit Operations Manager
- Director or Regulatory Compliance and Civil Rights Officer
- Compliance Specialist
- Customer Experience & Contract Compliance Specialist or Manager

Contractor(s)

- General Manager
- Operations Manager
- Safety and Training Manager
- IT Manager
- Quality Assurance Manager

Facility and Vehicle Maintenance Manager

Paratransit Operations Manager

Recommendations: Ensure that all job descriptions include Safety Management System responsibilities and relevant safety information for that job. The Chief Safety Officer should have a direct reporting line to the SMS Executive or Accountable Executive for the purposes of the Agency Safety Plan.

5.0 Safety Risk Management

A transit agency must develop and implement a Safety Risk Management process for all elements of its public transportation system. The Safety Risk Management process must be comprised of the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation.

5.1 Safety Hazard Identification

Methods or processes to identify hazards and consequences of hazards, which includes data and information provided by an oversight authority and FTA as sources for hazard identification.

As described in Section 4.2, The COMET has safety policies and procedures in place in cases of incidents or accidents, and a reporting process with designated forms. Existing forms do not include all Safety Management System elements.

Transit dispatch has a reporting process in place to document safety and security events, passenger complaints, fare disputes and any other situation outside of normal operating activities. The dispatch daily shift reports are meant to document these events and provide the ability for internal and external follow-up. Follow-up includes outcomes, employee response, and supervisor action.

Using Safety Management System principles, the Dispatch Report is used to identify a risk or

hazard. A process outlining next steps must be developed. Supervisor and Dispatcher roles and responsibilities must be defined regarding which types of complaints or incidents will be handled by whom.

Recommendation(s):

- Pre-trip inspections
- Preventive Maintenance program
- Annual inspection
- Facility inspections
- Security protocols
- Training
- Passenger complaints
- Public complaints
- FTA or State reviews
- Trip data analysis
- Safety meetings
- Trends identified
- Employee assessments
- Route evaluations
- Security video spot checks

The existing passenger complaint/compliment intake process should include Americans with Disabilities (ADA), Title VI and safety complaints with a priority path to supervisory investigation and assessment. The process should include documentation in a format that can be monitored for trends on a periodic basis. As per Federal requirements, The COMET must develop procedures for investigating and tracking Title VI and ADA complaints filed against them and make their complaint procedure available to the public. They must also develop a complaint form, and the form and procedures for filing a complaint shall be available on their website. Though Safety Management System is not as stringent as the FTA's Civil Rights regulations, it still requires all steps to be taken and documented.

A Hazard Reporting Form should be considered as part of hazard identification and the Employee Safety Reporting Program. The form should allow amendments to the original identification to include the following steps:

- Hazard identification
- Initial assessment matrix

- Investigation
- Mitigation plan
- Likelihood of repeat occurrence
- Follow-up to ensure mitigation was effective

The COMET and its contractor have several software programs that may be adapted to include this process and allow all staff involved to amend the safety event and keep all information in one document or file.

5.2 Safety Risk Assessment

Methods or processes to assess the safety risks associated with identified safety hazards. This must include assessment of the likelihood and severity of the consequences of the hazards, including existing mitigations, and prioritization of the hazards based on the safety risk.

The COMET has processes in place to identify hazards pertaining to accidents as discussed earlier, but assessment of those hazards before they become accidents is not documented using Safety Management System principles. FTA stresses in its rule that there must be documentation showing each hazard. Also, the identified risk or harmful practice is to be assessed to determine if mitigation is warranted and if so, how soon must action be taken based on the severity of inaction. Additionally, the assessment must include likelihood of the risk happening again. If the likelihood is high, the mitigation strategy must address the root cause versus responding to an isolated incident.

Recommendations: The COMET should include a simple assessment scale to apply to any hazard or incident identified. The scale will help determine the type and timeline for mitigation response. Two sample matrices are shown below:

RISK ASSESSMENT MATRIX				
Likelihood/ Severity	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	High	Medium
Probable (B)	High	High	Medium	Medium
Occasional (C)	High	Medium	Medium	Low
Remote (D)	Medium	Medium	Low	Low
Improbable (E)	Low	Low	Low	Low

Safety Risk Index	Criteria by Index
High	Unacceptable – Action Required: Safety risk must be mitigated or eliminated.
Medium	Undesireable – Management Decision: Executive management must decide whether to accept safety risk with monitoring or require additional action.
Low	Acceptable with Review: Safety risk is acceptable pending management review.

Training would need to accompany this scale to educate all employees regarding how to assess hazards using a scale. Modifications to existing forms like accidents, incidents or hazard identification forms might include the following information:

Initial Assessment of Hazard	
	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.
Likelihood of re-occurrence of this hazard (1-10)	

5.3 Safety Risk Mitigation

Methods or processes to identify mitigations or strategies necessary as a result of the agency's safety risk assessment to reduce the likelihood and severity of the consequences of hazards.

The COMET currently mitigates risk as it happens. Actions taken might include route changes due to construction or ensuring that there is a spare bus at the transit center. These actions are taken as a result of identifying potential risk to employees or passengers and preparing for the likelihood of an accident resulting in service disruption.

The COMET's Service Planning Committee is responsible for conducting route analysis and reviews for determining safety and performance. All route or service reviews must be documented properly to include safety elements. The Service Planning Committee meets monthly to study data related to route performance.

Weekly or monthly contractor meetings and Safety Committee meetings are also used to convey hazard or safety issues that have been identified with mitigation actions being taken. Minutes of the meeting are taken, and both The COMET administration & operations staff and contractor management staff attend. The meetings are meant to discuss safety event response, mitigation analysis, trend analysis and safety performance measures.

Safety Management System principles dictate that transit employees must document when mitigation actions are taken. Documentation is essential to understanding whether actions taken were appropriate to the level of risk or if additional actions are necessary. By documenting hazards, hazard assessments/ investigations and mitigation actions, the transit system is collecting information to analyze trends and effective responses. It is also required as part of the safety performance target development mentioned in Section 3.

Recommendations: The COMET must ensure a documentation trail that, beginning with hazard identification, includes all elements of Safety Management System reporting including mitigation actions. As previously mentioned, this documentation should be centrally located and contain a record of all Safety Management System steps taken.

The Service Planning and Safety Committees should include safety assessment as part of their service evaluation process. Safety data should be reviewed at monthly meetings.

6.0 Safety Assurance

The Agency Safety Plan describes or references documentation that defines:

6.1 Monitoring Compliance Activities

Activities to monitor the transit agency's system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance (i.e., safety performance monitoring and measurement).

Periodic performance reviews, audits and evaluations are methods of monitoring compliance with State and Federal regulations, industry standards and transit system policies and procedures. Reviews are not limited to employees or service but also apply to processes to determine effectiveness. Monitoring compliance activities includes ensuring transit policies and procedures support compliance with the FTA, the Occupational Safety and Health Administration (OSHA), and the U.S. Department of Transportation, Office of Civil Rights.

The COMET has monitoring practices in place for Federal, State and local compliance, but with 49 CFR Part 673, additional steps may be necessary to show proper monitoring of the safety program above and beyond normal The COMET risk management strategies.

A process for determining effectiveness of the Agency Safety Plan includes the

collection of data for analysis to determine trends. The transit system currently collects data on safety events like accidents and incidents. Various software programs listed in Section 6.2 are used to monitor safety in Maintenance, Operations, Customer Service, Training and Human Resources areas. The contractor's Safety and Training Manager is responsible for reviewing all safety events, mitigation strategy, reviewing events and recommending any necessary disciplinary action. She works closely with all departments and communicates well. The Safety & Training Manager is not only responsible for internal reporting, but also for external reporting to The COMET and contractor's corporate offices. In many cases, the contractor's office may make decisions about discipline or mitigation along with contractor's Operations Manager and Human Resources Departments.

There is no clear method of conducting a root cause analysis other than by the Service Planning Committee and reviews of safety events by upper management. Currently, actions are taken as the result of a safety event and follow-up is not well documented. The Safety Committee is listed in the contractor's safety documents, but it is not clear if this committee is in place, as reported by RLS.

Currently procedures for managing safety events include data collection, Safety Committee review of events at safety meetings, and a monthly summary provided to The COMET. Additionally, monthly facility inspections conducted by the contractor's Maintenance Department & The COMET's Administration and Operations staff include hazard identification, repair and replacement of defective equipment, and coordination on annual Transit Asset Management (TAM) Targets.

Recommendations: A process should be developed showing safety data analysis for trends, with anomalies being explained. For example, if the months of March and April showed a higher number of vehicle

breakdowns than previous months, there should be an explanation for this trend. The trend may be caused by increased service hours due to expansion or new vehicles with unexpected mechanical issues. Documentation of data analysis should be a part of the monthly safety report.

The COMET should increase its data points to include information needed for developing required annual safety performance targets, including:

- Deaths
- Injuries
- Safety Events
- Service Reliability

It is recommended data points be collected monthly to allow easy target development each year. In addition, the safety data should include sub-categories to allow separation by department, mode of service, type of event or other classifications which would help conduct detailed analyses. For example, an injury event should be broken into classification levels as indicated below:

Injury

- Major or Minor
- On-board bus, at facility or property
- Mode — paratransit, fixed route, commuter bus, vanpool, demand response taxi
- Contractor Departments – Maintenance & Operations, Paratransit, Safety Training, and Administration
- The COMET Departments – Administration and Operations, Finance, Regulatory and Compliance, Planning and Development and Executive
 - Slip and fall
 - Fast start/stop
 - Improper securement
 - Equipment of facility defect

The Safety Committee should be conducting regular meetings to evaluate the following: safety events, policies and procedures related to safety events, root cause analyses,

and identification of modifications needed to mitigate risk. The Service Planning and Safety Committees should also be charged with assisting the Accountable Executive, SMS Executive, and Chief Safety Officer with updates to the Agency Safety Plan.

6.2 Monitoring Operations

Activities to monitor the transit agency's operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended (i.e., Safety performance monitoring and measurement).

As previously mentioned, the Service Planning Committee, as mentioned earlier is responsible for monitoring and modifying routes, primarily for performance reviews. Safety elements can be easily added to the existing performance review format and would be another method of monitoring safety.

The contractor uses a software analysis program, Power BI, to analyze data input into the contractor's risk management software, Web Risk. Power BI generates summary reports used to submit to The COMET as well as Transdev Corporate offices. Transdev's Regional Safety Director works closely with the management team to identify areas of trends or changes to safety monitoring practices.

The COMET uses private security guards, Columbia Police Department, Riverside County Sheriff, and Cayce Police Department employees to monitor safety and security on fixed routes and at transfer facilities to provide an extra layer of security within the system. The officers may wear uniforms or dress in plain clothes.

Customer service representatives monitor incoming customer feedback and if safety issues are presented, the customer service representative will forward the documented customer feedback to the appropriate department via LISTEN, for further investigation. Riders may also voice any safety

concerns through the Midlands Transit Riders Association which works closely with The COMET to improve all aspects of the system through customer feedback.

A complete list of software used to monitor and maintain safety and performance is listed below:

- M Pulse — tracks facility maintenance and inspections
- Salesforce's LISTEN software — captures and records service complaints
- Smart Drive — identifies driving characteristics
- Apollo Camera — Surveillance camera system used in investigations
- Clever Devices — Manages Automated Vehicle Location (AVL) systems, voice enunciator and on-time performance
- Transloc — alerts drivers to detours or delays
- VDS Software — an attendance software that coordinates with ADP payroll system

Recommendations: Continuous monitoring of routes must be a part of the risk assurance strategy. A documented process for route evaluation of safety risk should be developed to include the following elements:

- A form used for each route evaluation
 - Date, time and route number
 - Identified hazards, if any (i.e. road construction, potholes, risky traffic pattern, changes to environment since last evaluation)
 - Potential environmental risks near designated stops
- Process for mitigating hazards identified
 - Assessment
 - Investigation
 - Chance of re-occurrence
 - Action
 - Follow-up
- Chain of command for mitigation and documentation
- Summary analysis to identify trends

6.3 Investigation Activities

Activities to conduct investigations of safety events, including the identification of causal factors (i.e., Safety performance monitoring and measurement).

The COMET uses a standard accident reporting form with basic information required for insurance purposes. The COMET's Fixed Route and DART paratransit Operator's Manual and Safety Policies and Procedures proposed by contractor both define accidents and the steps employees should take if they are involved in an event. All accidents, incidents and injuries are documented.

The Contractor's Safety and Training Manager reviews all accidents and incidents and makes a determination of preventability. This person works with Human Resources and the Contractor's Corporate Office to coordinate disciplinary action and/or remedial training. If their findings are challenged, the case is forwarded to the Accident Review Board (required by union contract) for further review. The Accident Review Board is comprised of management, drivers and a representative from the State of South Carolina.

RLS was provided information about a Safety Committee included in the Transdev Safety Policies and Procedures manual, but based on the interviews conducted it is unclear whether this has ever been implemented. The Safety Committee responsibilities outlined in the Safety Policies and Procedures show a leadership and committee structure, meeting schedules, objectives, activities and tasks. This committee is an ideal complement to the Chief Safety Officer and would serve to provide assistance, additional investigative elements and relief to the Contractor Safety and Training Manager. The Safety Committee should be the group to conduct root cause analysis, identify changes needed in safety policies and procedures and training reviews.

Recommendations: The foundation for investigation activities is present but additional

documentation is needed to verify that a root cause analysis is being conducted for each event. A simple modification of the accident/incident form to allow an "Investigation" or "Supervisor Analysis" section will provide adequate documentation of the process. Adding a report number to the accident form will aid the documentation process by adding a unique identifier for easy searching and accountability.

6.4 Monitoring Information

Activities to monitor information reported through any internal safety reporting programs (i.e., Safety performance monitoring and measurement).

As mentioned in Section 5.1, safety risk information is being collected in various places within The COMET structure and by a number of different reporting platforms; different reporting software and manual forms. Given that the information is not centrally located, compiling it for monitoring purposes can be challenging. Developing a consistent reporting process with common reporting categories will allow consistent analysis by attribute.

Recommendations: The COMET might consider using categories listed on the Hazard Reporting Form located in the Appendix of this Plan along with a Safety Management System Incident Report and Transit Service Evaluation Form. These are sample categories and should be customized to coordinate with other department reporting methods. Several managers will be involved in the process and should be able to update safety event information easily. The COMET currently has software similar to Google Docs, which allows different departments to update the same document.

It is recommended that the Safety Committee notes or minutes should be taken at each monthly meeting, including a description of the discussion and outcomes. Members of the committee should receive basic Safety

Management Systems training to understand the principles of Safety Management Systems, thus allowing them to support the Agency Safety Plan.

A consistent method for the reporting of potential safety risks should be developed, including procedures for beginning the Safety Management System documentation process, which staff should be involved, a timeline for each step, and follow-up process.

7.0 Safety Promotion

The Agency Safety Plan describes or references documentation that describes:

7.1 Safety Training

A comprehensive safety training program for all transit agency employees and contractors designated as directly responsible for safety in The COMET must be in place. This program must include refresher training, as necessary.

The COMET has a training curriculum for all new employees. The curriculum covers The COMET policies and transit specific training. The COMET also has refresher training outlines that are used during monthly safety meetings during which additional training is provided. Existing training programs are relevant and delivered by the Contractor's Safety and Training Manager. The contractor uses a combination of DVD training programs and in-house training, all of which is monitored to ensure that certifications remain current. All trainings includes sign-in sheets to ensure that employees across shifts have coverage.

ADA Paratransit training is provided by the contractor and includes additional paratransit specific training.

Recommendations: The Agency Safety Plan should include a listing of new-hire training and regular training programs for refresher, remedial and re-certification. The training section should also include defined strategies

for implementing refresher training; accidents, incidents, and employee evaluations.

In addition, the Agency Safety Plan should explain the methods used to ensure employees are following training standards. Employee evaluations and spot checks are proven methods for determining whether employees are retaining information and demonstrating comprehension. The contractor uses a combination of software programs to monitor employee performance and safety, including Clever Devices, Apollo Camera, and Smart Drive as examples.

7.2 Safety Communication

Communication of safety and safety performance information throughout the transit agency's organization is critical. It must convey, at a minimum:

- *Information on hazards and safety risks relevant to employees' roles and responsibilities, and*
- *Safety actions taken in response to reports submitted through an employee safety reporting program.*

The COMET displays information relating to safety warnings in various locations for easy employee visibility, including breakrooms, dispatch areas and in garages. Transloc software allows dispatch to notify drivers of identified in-service hazards.

Monthly safety meetings are also used to convey hazard or safety issues that have been identified with mitigation actions being taken.

Recommendations: It is recommended that The COMET ensure that maintenance personnel are attending quarterly safety meetings and taking part in relevant trainings to stay up to date with The COMET safety policies and procedures.

Safety meetings present an opportunity for the Safety Committee to conduct any root cause analyses which may not have been conducted immediately following a safety event. One of the committee members should be

responsible for taking notes and documenting discussions of safety events and any necessary mitigation actions. This is in addition to current safety meetings which are focused on reviewing safety data and determinations of preventability.

8.0 Additional Information

The Agency Safety Plan specifies or references:

Reference the Appendix at the end of this document for items of consideration, as optional ways for The COMET to improve the documentation of hazards and safety events through an Safety Management System format:

- Hazard Reporting Form
- Incident Report Form
- Service Evaluation Form
- Bus Stop Observation Report

8.1 Documentation

This Section must include documentation not included or referenced elsewhere in the Agency Safety Plan, related to:

- *Implementation of the transit agency's Safety Management System;*
- *Programs, policies, and procedures that the agency uses to carry out its Agency Safety Plan; and*
- *Results from Safety Management System processes and activities.*

The documents must be maintained for three years after they are created and must be made available upon request by the FTA or other Federal entity, or a State Safety Oversight Agency having jurisdiction.

The COMET has several safety documents recently updated in the last year and will be referenced in the Agency Safety Plan. Those documents include the following:

- Central Midlands Regional Transit Authority Safety Policy, February 26, 2020

- The COMET Safety Management System Development Plan, January 2020
- Customer Comment Procedure
- Disaster Preparedness Plan, September 5, 2019
- Emergency Communications Plan
- System Security and Emergency Preparedness Program Plan (SSEPP), October 1, 2019

8.2 Definitions of terms used in the Agency Safety Plan

The following terms will be included in the Agency Safety Plan.

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. (per § 673.5)

Accountable Executive (AE) 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. (per § 673.5 Definitions)

The transit agency must identify an Accountable Executive. The Accountable Executive is accountable for ensuring that the agency's SMS is effectively implemented throughout the agency's public transportation system. The Accountable Executive is accountable for ensuring action is taken, as necessary, to address substandard performance in the agency's SMS. The

Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the transit agency's safety performance cannot be delegated and always rests with the Accountable Executive. (per § 673.23(d)(1))

Chief Safety Officer/SMS Executive

means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

Safety Management System (SMS) Executive means a Chief Safety Officer or an equivalent. (per § 673.31)

The Accountable Executive must designate a Chief Safety Officer or SMS Executive who has the authority and responsibility for day-to-day implementation and operation of an agency's SMS. The Chief Safety Officer or SMS Executive must hold a direct line of reporting to the Accountable Executive. A transit agency may allow the Accountable Executive to also serve as the Chief Safety Officer or SMS Executive. (per § 673.23(d)(2))

Consequences are outcomes or what those conditions can cause. Transit agencies should assess the likelihood and severity of the consequences of a hazard, not of the hazard itself (per § 673.5)

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. (per § 673.5)

Event means any Accident, Incident, or Occurrence. (per § 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. Hazards are conditions. (per § 673.5)

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. (per § 673.5)

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. (per § 673.5)

National Public Transportation Safety Plan (NPTSP) 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. (per § 673.5)

Operator of a Public Transportation System means a provider of public transportation as defined under 49 U.S.C. 5302(14).

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. (per § 673.5)

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. (per § 673.5)

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. (per § 673.5)

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard. (per § 673.5)

Risk Mitigation means a method or methods to eliminate or reduce the effects of hazards. (per § 673.5)

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. (per § 673.5)

Safety Event means any Accident, Incident, or Occurrence. (per § 673.5)

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. (per § 673.5)

Safety Management System (SMS) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards. (per § 673.5)

Safety Performance Target means a performance target related to safety management activities. (per § 673.5)

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. (per § 673.5)

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. (per § 673.5)

Safety Risk Management means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk. (per § 673.5)

Serious Injury means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface. (per § 673.5)

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.

8.3 List of acronyms used in the Agency Safety Plan

Acronym	Word or Phrase
ADA	Americans with Disabilities Act of 1990
AE	Accountable Executive
ASP	Agency Safety Plan (also referred to as a Public Transportation Agency Safety Plan in Part 673)
CFR	Code of Federal Regulations
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SCDOT	South Carolina Department of Transportation
SMS	Safety Management System
The COMET	Central Midlands Regional Transit Authority
U.S.C.	United States Code
VRM	Vehicle Revenue Miles

9.0 Conclusion

The COMET is a transit system providing deviated fixed route, demand response/ADA paratransit, vanpool and demand response taxi service in Richland and Lexington Counties, South Carolina. The system has all the staffing requirements and experience to modify its policies, procedures and processes to adapt to the required Safety Management Systems required in 49 CFR Part 673. Implementation of the recommendations in this SMS Development Plan can be accomplished with relative ease. By using the existing foundation of safety protocols as building blocks, the suggested changes will result in more organized and user-friendly reporting system.

This Safety Management System Development Plan is meant to identify gaps in existing policies, procedures and processes compared to the requirements under FTA's rule on Safety Management System. The recommendations in this document were discussed during the Phase I, two-day meeting conducted in January 2020, and should be implemented as the Phase II Agency Safety Plan.

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Appendix A: Hazard Reporting Form

HAZARD REPORTING FORM							
Reporting Employee					Report #		
Date of Report							
Time of Hazard				Time Report Submitted			
Location of Hazard				Route/Manifest			
Supervisor Notified							
(Check all that apply)							
Type of Hazard							
Vehicle		Weather Related			Policy		
Passenger		Road Condition			Training		
Facility		Security					
Employee		Near Miss					
Description of Hazard							
Initial Action Taken to Mitigate Hazard							
Initial Assessment of Hazard (check one)							
	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.						
Likelihood of re-occurrence of this hazard (1-10)							
Received by: _____				Date/Time _____/_____/_____			

HAZARD MITIGATION						
Investigating Supervisor					Title	
Date of Investigation					Time	
Additional Information						
Assessment Classification (Circle)			Level 1	Level 2	Level 3	
					Report #	<input type="text"/>
Mitigation Action(s) Taken						
Action(s) Designed to:	Eliminate		Control			(Circle one)
Describe Communication of Action(s)						
Follow-up						
Date			Contact			
Status of Action Taken						
Is additional action needed?		YES		NO		
Additional Action Taken						
Follow-up						
Date			Contact			
Status of Action Taken						
Is additional action needed?		YES		NO		

HAZARD CLASSIFICATION							
						Report #	
Category of Hazard							
Vehicle				Passenger			
Mechanical				Behavior			
Performance				Weapon			
Interior				Suspended from svc.			
Exterior				Medical Emergency			
Towed				Injury			
Repaired on scene				Death			
Safety equipment				Mobility Devise			
Lift/Ramp/Securemt							
See Pre-Trip							
Facility				Facility			
Safety Equipment				Shelter			
Security Systems				Fueling			
Plumbing				Hazardous Materials			
Electrical				Fencing/Gate			
Foundation				Passenger Amenities			
Parking							
Equipment				Employee			
HVAC/Heat				Behavior			
Roof				Theft			
Storage				Endangering Others			
Computer/Data				Property Abuse			
Farebox/Vault				Illegal Activity			
				Chief Safety Officer Initials			

Appendix B: Incident Reporting Form

INCIDENT REPORTING FORM						
Reporting Employee					Report #	
Date of Report						
Time of Incident				Time Report Submitted		
Location of Incident				Route/Manifest		
Supervisor Notified						
(Check all that apply)						
Type of Incident						
Vehicle		Weather Related				
Passenger		Road Condition				
Facility		Security				
Employee		Near Miss				
Description of Incident						
Initial Action Taken to Mitigate Incident						
Initial Assessment of Incident						
	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.					
Likelihood of re-occurrence of this incident (1-10)						
Received by: _____				Date/Time _____/_____/_____		

INCIDENT MITIGATION						
Investigating Supervisor				Title		
Date of Investigation				Time		
Additional Information						
Assessment Classification (Circle)	Level 1	Level 2	Level 3			
				Report #		
Mitigation Action(s) Taken						
Action(s) Designed to:	Eliminate	Control	(Circle one)			
Describe Communication of Action(s)						
Follow-up						
Date		Contact				
Status of Action Taken						
Is additional action needed?	YES	NO				
Additional Action Taken						

INCIDENT CLASSIFICATION						
						Report # <input type="text"/>
Category of Incident						
Vehicle			Passenger			
Mechanical			Behavior			
Performance			Weapon			
Interior			Suspended from svc.			
Exterior			Medical Emergency			
Towed			Injury			
Repaired on scene			Death			
Safety equipment			Mobility Devise			
Lift/Ramp/Securemt						
See Pre-Trip						
Facility			Facility			
Safety Equipment			Shelter			
Security Systems			Fueling			
Plumbing			Hazardous Materials			
Electrical			Fencing/Gate			
Foundation			Passenger Amenities			
Parking						
Equipment			Employee			
HVAC/Heat			Behavior			
Roof			Theft			
Storage			Endangering Others			
Computer/Data			Property Abuse			
Farebox/Vault			Illegal Activity			
			Chief Safety Officer Initials			<input type="text"/>

Appendix C: Service Review Form

The following Service Evaluation Form is used on a periodic basis to evaluate routed/demand response services to determine the safety of the route, timing, pickup location, ridership and facilities. The form is then reviewed by [Transit Agency]'s Safety Committee/Chief Safety Officer (CSO) to assess and determine if changes or enhancements must be made to mitigate safety or security threats. If changes to the service are made, follow-up evaluation of the change(s) will be conducted to determine the effectiveness of the change(s). The CSO will evaluate the event to determine the likelihood of a similar event/hazard happening again. If the likelihood of re-occurrence is rated "High" or "Medium", additional action may be necessary.

All staff have been trained in the importance of periodic evaluations of our service to ensure the safety of the riders, employees, public and assets. The employee self-reporting, customer feedback and management observation play instrumental roles in prioritizing service evaluations. Random service evaluations will also be conducted whether a potential safety or security threat have been identified or not.

SERVICE EVALUATION FORM

Date ____/____/____

The following service was evaluated:

- Fixed Route #/Vehicle # _____
- Paratransit Manifest/Vehicle # _____
- Passenger Pickup Location _____
- Facility _____

Elements of Evaluation:

Location

- Road hazard _____
- Passenger access hazard _____
- Construction zone _____
- Passenger Issue _____
- Traffic Hazard _____
- Facility Hazard _____
- Safety Issue _____
- Security Issue _____
- Timing _____
- Other _____

Provide details below of hazard:

CSO Initial's _____

Assessment Level

- High Priority
- Medium Priority
- Low Priority

Hazard Response Action Taken:

Date of Response: _____

Follow-Up

Date: _____

What is the likelihood of this hazard happening again? High Medium Low

Appendix D: Driver Evaluation Form

ROAD OBSERVATION REPORT RIDE CHECK REPORT

DATE: _____ TIME: _____ AM / PM
 VEHICLE NUMBER: _____ MED. CARD: EXP: _____ CDL DL# _____ EXP: _____
 DRIVER: _____
 ROUTE / LOCATION: _____ DIRECTION: _____ UNIFORM / ID BADGE /Name
 ROAD CONDITIONS: DRY WET ICE WEATHER: CLEAR CLOUDY RAIN FOG SNOW
 HEADLIGHTS ON YES NO VIOLATION OF LAW (IMMEDIATE FAILURE)

<u>OK</u>	<u>NEEDS IMPROVEMENT</u>		<u>OK</u>	<u>NEEDS IMPROVEMENT</u>	
<input type="checkbox"/>	<input type="checkbox"/>	Operated within posted speed limit	<input type="checkbox"/>	<input type="checkbox"/>	Proper backing procedure
<input type="checkbox"/>	<input type="checkbox"/>	Speed reasonable for conditions	<input type="checkbox"/>	<input type="checkbox"/>	Pre-Trip Inspection
<input type="checkbox"/>	<input type="checkbox"/>	Maintains proper following/stopping distance	<input type="checkbox"/>	<input type="checkbox"/>	Braking smooth
<input type="checkbox"/>	<input type="checkbox"/>	Accelerates smoothly	<input type="checkbox"/>	<input type="checkbox"/>	Proper distance from the curb
<input type="checkbox"/>	<input type="checkbox"/>	Proper use of turn signals/hazards	<input type="checkbox"/>	<input type="checkbox"/>	Turning (mirror awareness)
<input type="checkbox"/>	<input type="checkbox"/>	Observed stop sign/traffic signal	<input type="checkbox"/>	<input type="checkbox"/>	Proper radio procedure
<input type="checkbox"/>	<input type="checkbox"/>	Good general vehicle control	<input type="checkbox"/>	<input type="checkbox"/>	Proper passenger assistance (off bus)
<input type="checkbox"/>	<input type="checkbox"/>	Removes keys when leaving vehicle	<input type="checkbox"/>	<input type="checkbox"/>	Condition of bus interior
<input type="checkbox"/>	<input type="checkbox"/>	Passengers all properly seated / orderly	<input type="checkbox"/>	<input type="checkbox"/>	Driver appearance/professional manner
<input type="checkbox"/>	<input type="checkbox"/>	Operated in proper traffic lane	<input type="checkbox"/>	<input type="checkbox"/>	Proper Routing / on-time
<input type="checkbox"/>	<input type="checkbox"/>	Wheelchair / Lap Belt / 4 pt. Tie Down	<input type="checkbox"/>	<input type="checkbox"/>	R/R Crossing
<input type="checkbox"/>	<input type="checkbox"/>	Uses Proper Body Mechanics	<input type="checkbox"/>	<input type="checkbox"/>	Uses Safe work practices
<input type="checkbox"/>	<input type="checkbox"/>	Proper Fare Handling	<input type="checkbox"/>	<input type="checkbox"/>	ADA Announcements
<input type="checkbox"/>	<input type="checkbox"/>	Other : _____			

Comments / Suggestion: _____

Driver Signature: _____

Observer Signature: _____

Manager Signature: _____

Appendix B: The COMET Safety Policy

CENTRAL MIDLANDS REGIONAL TRANSIT AUTHORITY

Policies and Procedures

Subject: Safety Policy

Policy Number: _____

Board Approval: February 26, 2020

Purpose: The purpose of this policy is to ensure compliance with federal regulations regarding safety.

Background: As a recipient of FTA federal funds, The COMET is required to implement and comply with the Public Transportation Agency Safety Plan (PTASP) Final Rule 49 CFR Part 673. The PTASP was published on July 18, 2018 with an effective date of July 19, 2019 and a compliance date of July 20, 2020. This rule requires that covered transit agencies develop and implement safety management plans that meet the requirements of this rule.

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 Public Transportation Agency Safety Plan, which will be responsive to FTA's Public Transportation Safety Program, and reflect the specific safety objectives, standards, and priorities of each transit agency. Each Public Transportation Agency Safety Plan 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.

Policy: Central Midlands Regional Transit Authority (The COMET) is committed to providing safe, secure, clean reliable and efficient transportation services to the patrons. This policy statement serves to express management's commitment to and involvement in providing and maintaining a safe and secure transit system.

In the interest of safety and security, and in order to comply with the Federal Transit Administration (FTA) requirements, The COMET's goal is to place primary importance on the personal health and safety of each employee and contractor. Accordingly, prevention of work-related accidents/injuries must be given precedence over operating productivity whenever necessary. Management will provide, to the greatest extent feasible, safety devices and protective equipment necessary for personal health and safety consistent with the highest standards.

The objectives of this Safety Policy are to:

1. Create a culture that supports safety and security through the appropriate use and operation of equipment and resources among our employees and contractors.
2. Partake in and strengthen community involvement and participation in the safety and security of our system.
3. Develop and implement a Threat and Vulnerability Assessment program and, based on the results of this program, establish a course of action for improving physical safety and security measures and emergency response capabilities.
4. Expand our training program for employees, volunteers and contractors to address safety and security awareness and emergency management concerns.
5. Enhance our coordination with partner agencies regarding safety, security and emergency preparedness issues.
6. Ensures that safety, security and emergency preparedness are addressed during all phases of system operation including hiring and training of personnel; procurement and maintenance of equipment; development of policies and procedures; delivery of service, and coordination with local emergency management and first responder agencies.

The COMET management is responsible for maintaining a coordinated safety system in order to identify and prevent unsafe acts and conditions that present a potential danger or threat to public safety. The Executive Director/CEO has responsibility for maintaining and implementing this policy and directing The COMET employees and management towards complying with the policies, procedures, and standards included in this document. All personnel, and contract service operators are charged with the responsibility of adhering to this Safety Policy. Any violation of safety and security practices is subject to appropriate administrative action. Executive Director/CEO is ultimately responsible for enforcing the Safety Policy and maintaining a safe and secure system as the accountable executive. The SMS Executive and the Chief Safety Officer as designed by the Executive Director/CEO has the responsibility of carrying out the intent of this policy.

The COMET will maintain a written safety program to which strict adherence will be mandatory. The Executive Director/CEO will be responsible for monitoring compliance with all provisions of the safety program.



CENTRAL MIDLANDS REGIONAL TRANSIT AUTHORITY SAFETY PROGRAM PROCEDURES FOR ITS EMPLOYEES, BOARD OF DIRECTORS, CONSULTANTS AND VOLUNTEERS

INTRODUCTION

The safety program contained herein has been prepared to assist employees in the safe and efficient performance of their duties. Maintaining a safe place to work is of utmost importance to The COMET, and we firmly believe that strict adherence to the procedures of this safety program will hold work-related accidents/injuries to a minimum.

It will be the duty of all employees to plan and carry out their job assignments in the safest manner possible. The practice of effective accident prevention is mandatory and a responsibility to be shared by each and every employee.

Since it is not possible to cover every situation which might be encountered, the Executive Director/CEO will be responsible for tailoring these guidelines to meet the requirements of their particular operation. Remember . . .

SAFETY DEPENDS ON ALL OF US!

USE GOOD COMMON SENSE AND SOUND JUDGMENT!

The primary function of the safety responsibilities of the Executive Director/CEO will be to review major accident-producing conditions and circumstances and to recommend corrective action. The Executive Director/CEO will also review reports of work-related accidents and injuries, employee suggestions, reports and/or correspondence from COMET's workers' compensation carrier and proposed new construction and/or installation of equipment. Further responsibilities will include periodic checks of safety procedures and their effectiveness, semi-annual safety inspection tours of all COMET facilities, assistance with development and implementation of safety policies and procedures as necessary and such other actions as may be required for maintaining an effective safety program and reducing work-related accidents and injuries.

SAFETY INSPECTIONS

The Director of Administration & Operations/COO will establish and carry out a schedule of regular safety inspection tours of all The COMET facilities. The main purpose of these safety inspections will be to bring to light any unsafe conditions or acts that might exist and to effectuate corrective action before an accident occurs.

The Director of Administration & Operations/COO will make a written report of their findings. Each such report will be reviewed by the Executive Director/CEO.

RESPONSIBILITY

The Executive Director/CEO is initially and ultimately responsible for accident prevention. This responsibility through management directives and the safety program. The Executive Director/CEO will establish safety performance goals and will maintain accurate performance and accident records. These goals and records will be reviewed regularly and appropriate action taken

as a measure of managerial and supervisory proficiency. The Executive Director/CEO will be responsible for reviewing all accident and investigation reports.

Employees must abide by adopted safety procedures at all times. Those who do not will be subject to appropriate disciplinary action. Prescribed wearing apparel and safety equipment will be worn while on the job. Employees are expected to observe general housekeeping rules and to assist in maintaining their respective work areas in a clean and sanitary condition. Employees must immediately report **ALL** accidents (including minor incidents and accidents that are around the vicinity of the employee) and **ALL** injuries (whether or not they require medical attention) to their supervisor. Each and every employee is expected to comply with and support the provisions of the safety program.

ACCIDENT INVESTIGATION

All accidents should be investigated thoroughly, even though they may only be minor incidents. Of primary concern should be the potential seriousness represented by the **CAUSE** of the accident. The cause of an accident resulting in a minor injury this time could eventually result in serious damage, serious injury or even a fatality if not corrected. Minor accidents should be viewed as an opportunity to learn what can be done to prevent a more serious accident.

Investigations must be made as soon as possible after the occurrence of an accident. The sooner facts relating to the accident are determined, the more accurate and reliable they will be. Even though the supervisor conducting the investigation may not have been witnesses to the accident, they will be responsible for gathering information from eye witnesses and other employees familiar with the conditions in the area where the accident occurred. Based on the information obtained, the supervisor must then formulate an opinion as to the cause of the accident and immediately notify the Executive Director/CEO of any corrective measures they recommend to prevent recurrence of a similar accident.

As a minimum, the following guidelines must be followed when investigating an accident:

- Physical causes that may have contributed to the accident are to be reviewed; e.g., poor housekeeping conditions, improper apparel, defective equipment, unsafe work area, etc.
- Personal causes that may have contributed to the accident are to be reviewed; e.g., unsafe action by the injured employee, unsafe action by someone else that contributed to the accident, violation of rules or instructions, etc.
- A determination is to be made as to **WHY** an unsafe condition existed or **WHY** an employee engaged in an unsafe act. (Was it because of a disability, or did he misunderstand the instructions given? Was it because he had not received sufficient instructions and lacked experience, or did he have the wrong attitude and consider the instructions unimportant?)
- A recommendation is to be made to the Executive Director/CEO as to what action should be taken to prevent recurrence of a similar accident. The Executive Director/CEO is responsible to see that any appropriate corrective measures are undertaken immediately.
- All information relative to the accident and subsequent investigation is to be recorded and sent to the Executive Director/CEO.

The cause of an accident should not be considered under control or eliminated until follow-up observations and inspections clearly demonstrate that any action taken has been effective; therefore, supervisors must closely monitor the results of any action taken. If violations are observed, the supervisor must determine why the violations have occurred and recommend further action as necessary to accomplish their objective.

ACCIDENT RECORDS

An accurate accident recordkeeping system must be established and maintained. Copies of all records must be submitted to the Executive Director/CEO at the time they are prepared so that accurate, up-to-date composite records will be maintained and:

- indicate the type and prevalence of accidents;
- locate operational and geographical problem areas;
- identify areas with a high frequency of accidents;
- identify areas where the most severe injuries occur;
- indicate prevalence of unsafe physical conditions and work practices; and
- assist in determining the effectiveness of the safety program.

Accurate accident records are essential to an efficient and successful safety program. The three general categories that describe the primary purpose of maintaining these records are to:

1. serve as a guide for accident prevention;
2. furnish information necessary for the injured person's compensation; and
3. assist in determining costs of accidents.

More specifically, these records will be used to . . .

. . . create a genuine interest in job safety;

. . . determine the main sources of accidents so that corrective efforts can be concentrated on areas that will result in the largest reduction of accidents; and

. . . determine whether or not the accident experience is improving.

To ensure uniform compliance with the recordkeeping provisions herein, the Executive Director/CEO will develop and/or distribute appropriate report forms as necessary.

SAFETY HAZARD ANALYSIS

The Executive Director/CEO will review all accident investigation reports, hazard reports and incident reports from employees to determine any trends in accidents or hazards that may have developed. This review will be conducted on an as-needed basis. The Executive Director/CEO will then recommend any corrective actions to be taken to prevent recurrence of similar accidents or hazards.

EMPLOYEE TRAINING

In a continuing effort to prevent accidents/injuries and to provide general health and safety information, safety training will be conducted on a regular basis. COMET will be responsible for safety training. As a minimum, employees will receive training in the following general areas:

Slips, Trips and Falls; Fire Extinguishers; Housekeeping; First Aid; CPR; Personal Ergonomics; Substance Abuse; Personal Protective Equipment; Summer Safety; Winter Safety; and Safety Orientation (new employees)

In addition, the following specialized training will be provided to employees exposed to associated hazards:

Hazardous Chemicals; Confined Spaces; Respirator Use; Ladders; Lockout/Tagout; Bloodborne Pathogens; Flammables and Combustibles; Machine Guarding; Pump Stations; Trenching and Shoring; and Welding, Cutting and Brazing

FIRST AID

First aid is the emergency treatment of the sick or injured before professional medical or surgical attention can be administered. First aid **DOES NOT** take the place of professional medical or surgical attention and should consist of furnishing only temporary assistance until professional aid is obtained. Minor injuries not requiring professional assistance should also be treated immediately since small cuts and scratches can develop into serious infections if not treated.

To the extent feasible, first aid supplies should be available at every work site. Supplies should consist of all items necessary to handle emergencies that may occur and should be replenished as necessary.

It is recommended that employees complete an approved first aid course such as the one offered by the American Red Cross. This will ensure that trained personnel are available at all times to assist injured persons when required.

SAFETY RULES & REGULATIONS

These rules and regulations have been developed to assist supervisors and employees in the practice of safe job performance. Compliance is mandatory; violations will result in appropriate disciplinary action. Questions, comments and suggestions relative to these rules and regulations are solicited and should be directed to the employee's supervisor or Executive Director/CEO.

Cases, Boxes, Cartons and Similar Objects

When using these objects, do not stack them insecurely; obtain a firm grip; check for protruding wires, nails, splinters, broken glass or any sharp object that might pierce or cut your hands; when removing from a stack, be sure the stack remains stable; allow clearance for your hands and feet; do not attempt to carry too many at one time; and wear gloves if the surfaces are rough or have sharp edges.

Chemicals, Acids & Caustics

Corrosive acids and caustic powders and solutions are destructive to body tissue. The effect of contact with corrosive acids or caustics is similar to that of a burn from a heated object or flame. The destruction of tissue may be minor or severe depending upon the length of time it is in contact with the flesh. Only authorized individuals are permitted to handle chemicals and caustics. Acids and caustic solutions should be handled or used in such a manner as to avoid splashing. Always use rubber gloves and goggles to protect hands and eyes when handling chemicals. Rules governing the use of protective masks/ breathing apparatus must be followed.

Electrical Apparatus

Before working on electrical apparatus or current-carrying parts of equipment, be sure to shut off current or tag or lock switch in open position. When necessary to work in close proximity to live, uninsulated lines or current-carrying parts of equipment, rubber gloves and other protective clothing must be worn to prevent contact with such live lines and equipment. Ground wires on motors and other electrical apparatus must not be

disconnected or broken. Only authorized individuals are permitted to make alterations or repairs to electrical equipment.

Field Operations. Bus Yard and Maintenance Garage

Protective clothing (e.g., heavy shoes, leggings, gloves, reflective harnesses and long-sleeved shirts, safety vests) should be worn whenever work is being performed in ditches or areas with heavy vegetation. A first-aid kit, including a snakebite kit, should be placed in each supervisor's vehicle and in every frequently used field vehicle. At least one person on each crew should be trained to give first aid. Goggles or face shields should be worn while removing or working in and around brush or vehicles. Adjustments are not to be made on mowers while they are in operation. Trenches that are five feet or more in depth must be sloped at an angle of repose or adequately shored up. Compressed gas cylinders should be supported in an upright position. Appropriate guidelines must be followed for the safe and efficient movement of traffic and the protection of workers at street construction, maintenance and utility work areas. Generally, these guidelines will be in accordance with the American Traffic Safety Services Association (ATSSA) Guide for Work Area Traffic Control.

Fire Prevention

Poor housekeeping is the cause of many fires; therefore, make sure that "No Smoking" rules are observed; burning cigarette butts are not swept into waste units; waste is not allowed to accumulate in areas not intended for that purpose; waste is disposed of daily; empty boxes (wood or cartons) are not allowed to accumulate in various storage areas - collect them and stack neatly in an area designated for that purpose; and all electrical equipment is in good order (i.e., wires, switches, panels, motors, battery chargers, etc.).

PROTECT YOUR JOB BY KEEPING KNOWN FIRE HAZARDS UNDER CONTROL!

Firefighting Equipment

Report any empty fire extinguisher. Check the tags on all fire extinguishers (they should **not** date back more than 12 months). Extinguishers should be mounted on brackets and should not be on the floor. See that extinguishers are prominently displayed and not hidden by stock piles or clothing. Make sure you understand how to use the different types of extinguishers. **NEVER** use water-type extinguishers on electrical fires. (All soda/acid-type extinguishers should be replaced.)

Flammables

Remember that gasoline, naphtha, alcohol, lacquers, thinners and similar liquids give off fumes that are highly flammable. It is extremely dangerous to use them where there is a possibility of ignition of fumes from an open flame, electrical spark or lit cigarette. Smoking is not permitted when fueling vehicles. Gasoline, naphtha and other highly flammable liquids must not be used for degreasing or for cleaning purposes of any kind.

Floors and Walking Surfaces

Any spilled substances such as water or oil should be removed immediately. Watch your footing when floors are wet and slippery. **DO NOT RUN!** Floors should be kept clear of glass, nails, extension cords and other objects which may cause slips, falls or punctures.

Drain covers should be kept in place and flush with the floor at all times. Floor areas which have just been painted or washed should be roped off or blocked until dry. Avoid shortcuts through slippery areas.

General

Be sure you thoroughly understand your job; never attempt to do work to which you have not been assigned or with which you are not familiar. Be considerate of the safety and welfare of fellow workers. Avoid lifting weights beyond your ability and ask for help when necessary. When lifting, keep back straight, bend knees and make use of leg muscles. Never use a case, chair, box or any other makeshift device to stand on. Always use a ladder or suitable platform. **Do not indulge in horseplay**; it leads to accidents. Do not overreach; it is a common cause of injury. Immediately report every accident and injury - no matter how minor - to your supervisor or Executive Director/CEO and obtain proper first aid treatment. Keep alert when working or passing under low-hanging fixtures or other obstructions. Use gloves when handling trash or other objects with sharp or ragged edges. Lids, levers, bars, handles and similar objects, when placed in an upright position, should be firmly tied or supported to prevent falling. Do not stand directly under any object being hoisted. Do not perform work over heads of fellow employees if it can be avoided. If necessary to do so, warn them and see that they are protected against the possibility of falling tools or materials. Cylindrical objects of any nature, such as rollers, pipes, tanks, etc., should be securely blocked or chocked to prevent rolling. Any heavy object which is placed on temporary blocks must be properly supported to prevent falling. Nails must be removed at once from used lumber.

Grinding and Buffing Wheels

Goggles must be worn when using grinding or buffing wheels. When grinding small parts, a suitable clamp or other holding tool must be used instead of attempting to hold with fingers. Keep tool rest adjusted to within 1/4 inch of the grinding wheel.

Hand Tools

Do not use defective tools such as those with cracked handles, cold chisels with mushroom heads and wrenches with spread jaws. Always use goggles when cutting, chipping, scraping or doing similar work which causes chips or scale to fly. Support yourself properly and provide clearance for your fingers and feet when pushing down on a pry, crowbar or wrench. Do not exert too much pressure with a small tool or use an oversized wrench on a light bolt. Keep your fingers away from the cutting edges of sharp tools. Do not point an ice pick, screwdriver or any other sharp tool toward your body. Be sure that the tool you use is of proper type and size for the job at hand.

Ladders

Do not overreach when working from a ladder. Be sure the ladder is blocked or tied to prevent slipping. If this is not possible, have someone hold it. See that the ladder is of proper length to provide safe access to the job to be done. When ascending or descending, watch footing, keep one hand free for support and do not hurry.

Machinery

Do not start any machine until you are certain that no one is working on it or exposed to it. Do not attempt to clear a jam, clean, oil, repair or adjust any machine until it has come to a full stop. (Certain machines such as pumps, engines, etc. may have to be oiled when in motion. In such cases, proper facilities for doing this safely should be used.) Whenever necessary to remove guards for repairs, make sure they are replaced before the machine is started.

Office and Shop Operations

Keep phone and equipment cords coiled up and out of walkways. Raised floor outlets in walkways should be removed or capped if removal is impossible. Desk and cabinet drawers should be kept closed when not in use. Use step stools or ladders to reach high places; do not use chairs, boxes or desks. Repair or remove loose floor tiles, worn carpeting and mats with turned-up edges. Do not leave supplies or boxes in doorways, walkways or on stairs. Non-slip floor waxes should be used. All stairways should be well lighted with non-slip stair treads and handrails on at least one side; open stairways should have handrails on both sides. Place non-slip mats inside doorways and mop up water around entrances during wet weather. The office watchwords should be . . . “If you drop it, pick it up; if you spill it, wipe it up.”

Power Saws

Saw guards must be kept in place at all times except when, because of the nature of the work, it is impossible to use guards. A pusher stick must be used so that it will not be necessary to place fingers near revolving saw.

Stairs

Do not run up or down stairs but proceed with a degree of speed consistent with safety. Keep one hand on rail and watch where you step. Slippery substances such as oil should be removed immediately. Boxes or other objects should not be left on stairs where they may cause persons to trip. Do not attempt to carry bulky or unwieldy objects up or down stairs without adequate assistance. Extreme precautions should be taken on outside stairs when it is raining, sleeting or snowing.

Vehicles

Watch your footing and look where you step when getting on or off vehicle. Use handle or hand grip for support. Do not get on or off moving vehicles. Load chain or safety bar should be kept in place at all times when vehicle is in motion. See that footing is secure when moving objects in vehicles; do not overreach. Keep alert when working in vicinity of moving vehicles; watch for vehicles backing up; keep feet clear of wheels. To the greatest extent feasible, employees authorized to ride in City-owned vehicles must be seated in cab when vehicle is in motion. You must not ride load, tailgate or running board unless authorized to do so by your supervisor. Riding outside the cab will be avoided whenever possible and, when necessary, will be done using extreme care. Do not drive if you feel drowsy, ill or fatigued.



WORKPLACE ACCOMMODATION REQUEST FORM

EMPLOYEE: _____

DATE SUBMITTED: _____

1. Please state why you are requesting an accommodation (identify and describe the physical or mental disability, illness, condition or disease which is the basis for your request):

2. List- job related tasks(s) you have difficulty performing due to your disability.

3. Accommodation(s) you are requesting:

4. Describe how the accommodation(s) will assist you:

Employee Signature

Date



NOTICE OF WORK-RELATED INJURY OR ILLNESS

EMPLOYEE: _____

DATE SUBMITTED: _____

This is to notify The COMET of a work-related injury or illness.

1. The work related injury or illness occurred on _____ at _____ .m.

2. Location where the injury or illness occurred was:

3. Describe how the work-related injury or illness occurred:

4. Describe the work-related injury or illness:

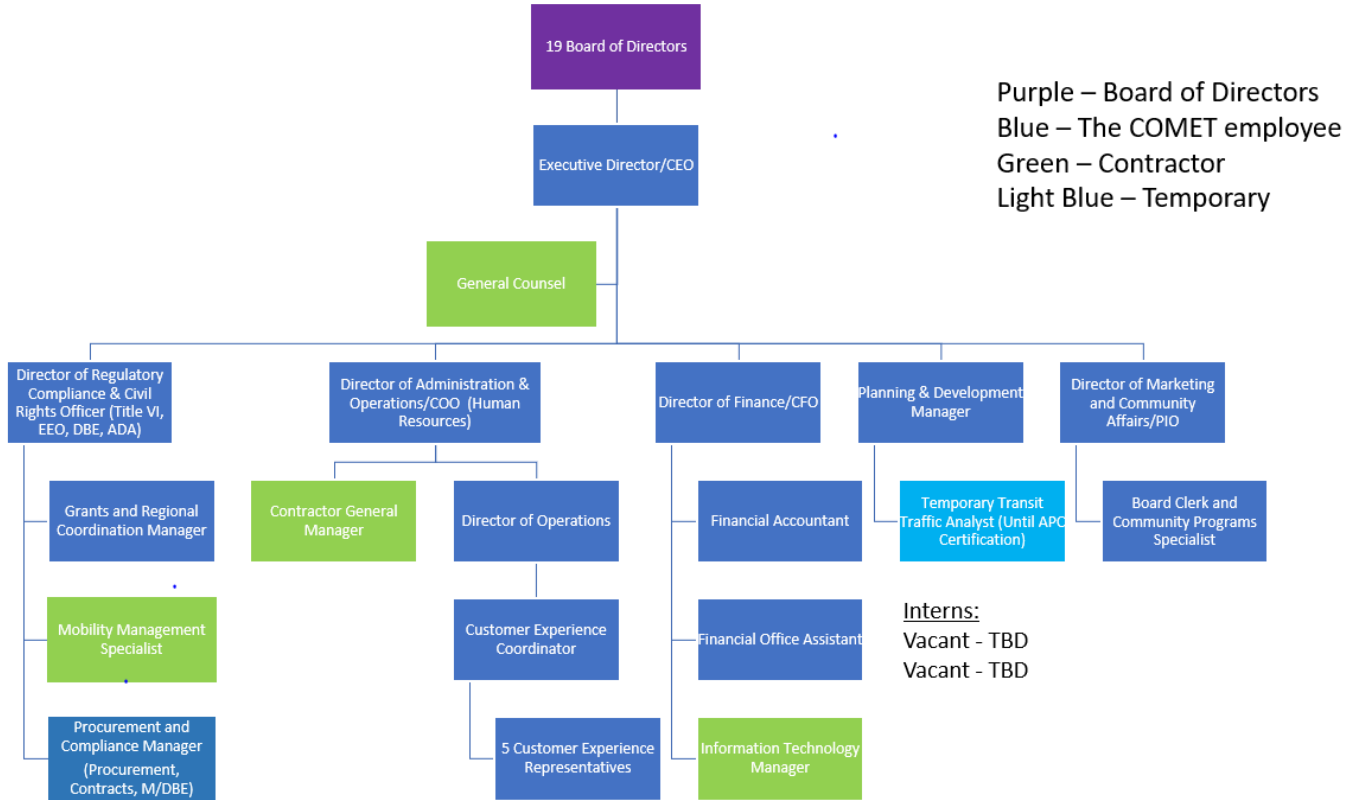
5. Identify all individuals who observed the incident giving rise to the work-related injury or illness occurred:

Employee Signature

Date

Appendix C: The COMET Organizational Chart

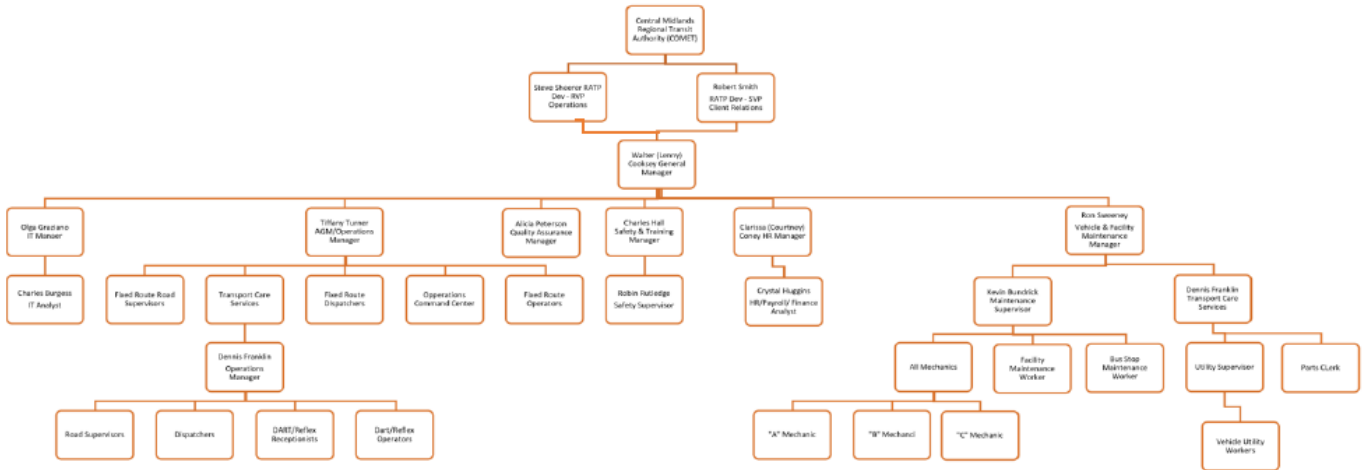
The COMET Organizational Chart (June 2023)



Appendix D: RATP Dev Organizational Chart



Organizational Chart of RATP Dev USA-COLUMBIA SC



Appendix E: The COMET System Map

