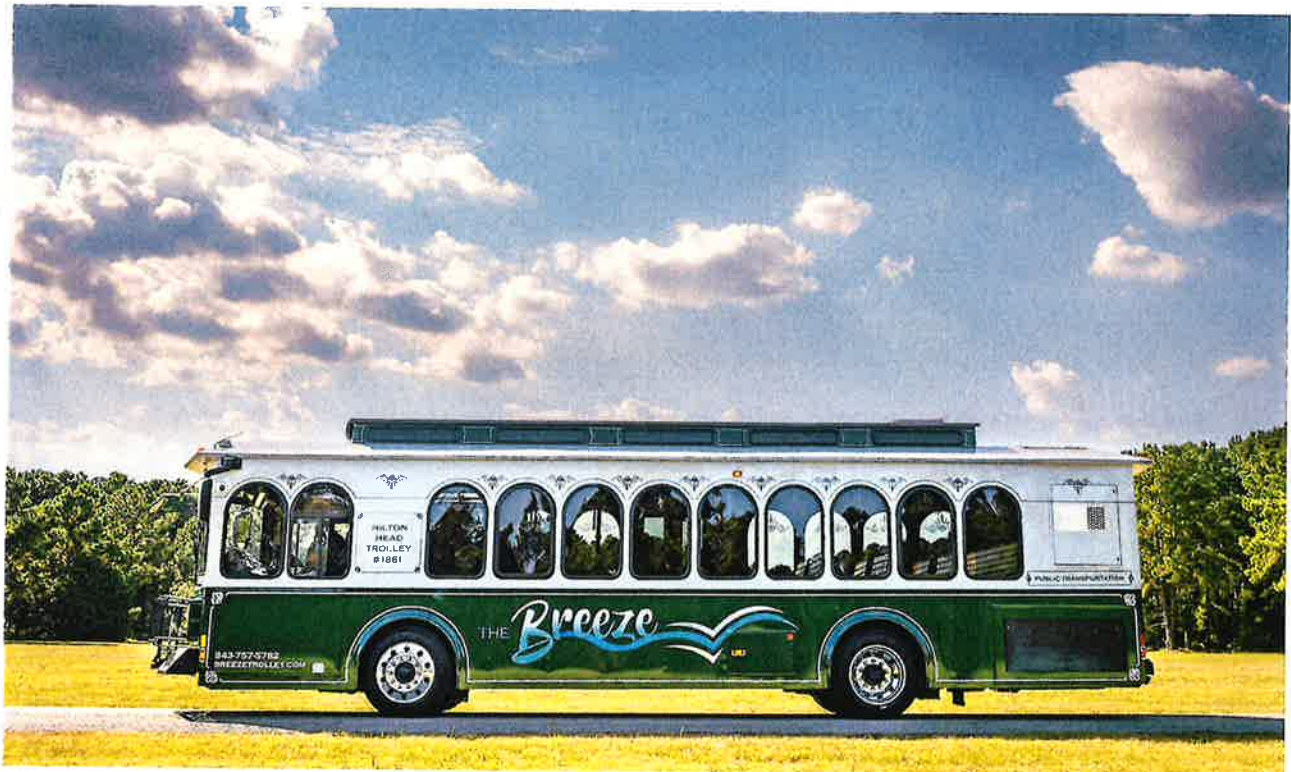




Lowcountry Regional Transportation Authority dba Palmetto Breeze Agency Safety Plan

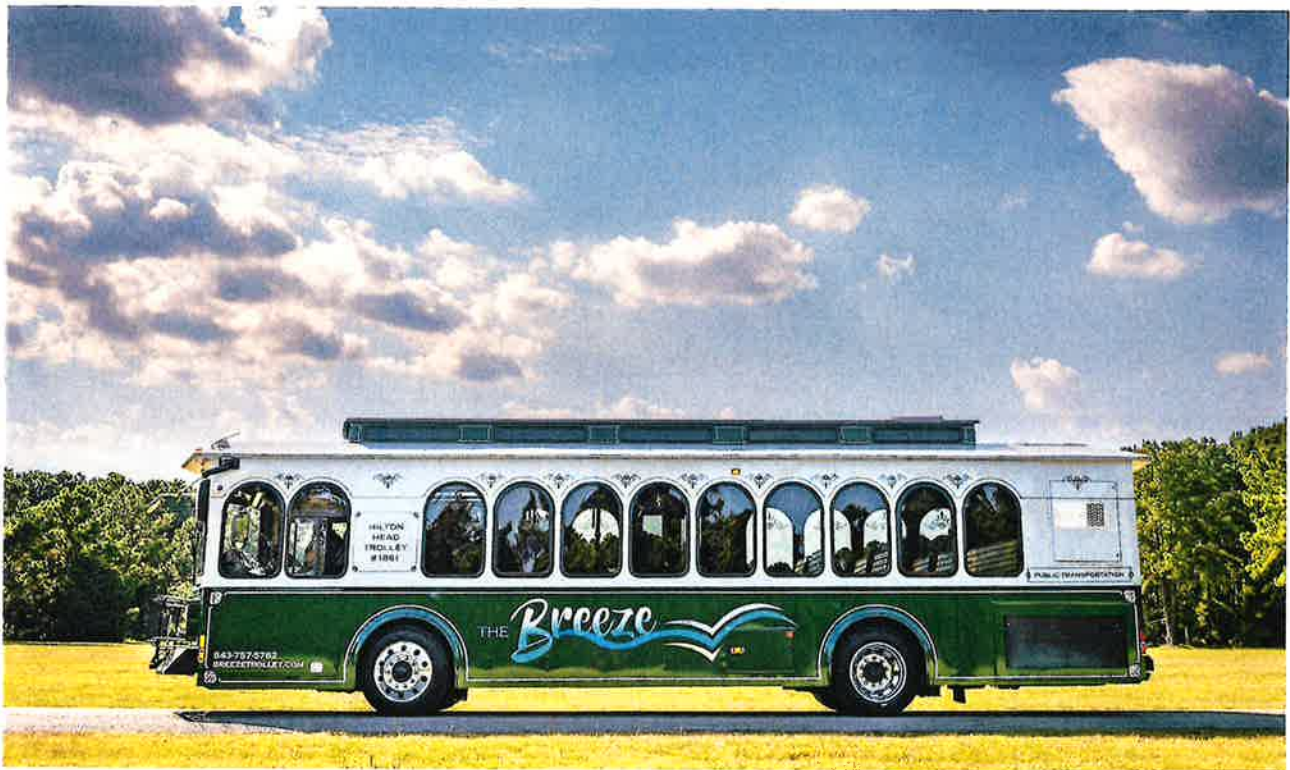
05/27/2020





Lowcountry Regional Transportation Authority dba Palmetto Breeze Agency Safety Plan

05/27/2020



Safety Plan Version Activity Log

Version Number and Updates			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	Entire Document	New Document	05/27/2020

Agency Safety Plan and Safety Management System (SMS)

LRTA developed this safety plan to comply with 49 CFR Part 673, the PTASP regulation. This plan also serves as an "SMS user's manual" that guides LRTA in the successful implementation and operation of its SMS. The agency safety plan addresses all applicable requirements and standards as set forth in FTA's Public Transportation safety program and the national public transportation safety plan.

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1. Transit Agency Information

Transit Agency Name	Lowcountry Regional Transportations Authority (LRTA) dba Palmetto Breeze								
Transit Agency Address	25 Benton Field Road, Bluffton SC 29910								
Name and Title of Accountable Executive	<p>Mary Lou Franzoni, Executive Director</p> <p>The Accountable Executive meets the requirements in 49 CFR § 673.5 and §673.23(d)(1). Please see the Roles and Responsibilities of the Accountable Executive in Section 4-Safety Management Policy.</p>								
Name of Chief Safety Officer	<p>Yazmin Winston Black, Chief Safety Officer</p> <p>The Chief Safety Officer is responsible for the day-to-day operation of the SMS. Please see the Roles and Responsibilities of the Chief Safety Officer in Section 4-Safety Management Policy.</p>								
Mode(s) of Service Covered by This Plan	Commuter, Fixed Route, and Demand Response	List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5311, 5310						
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	<table> <tr> <td>Fixed-Route</td> <td>Directly Operated</td> </tr> <tr> <td>Demand Response</td> <td>Directly Operated</td> </tr> <tr> <td>Commuter Bus</td> <td>Directly operated</td> </tr> </table>			Fixed-Route	Directly Operated	Demand Response	Directly Operated	Commuter Bus	Directly operated
Fixed-Route	Directly Operated								
Demand Response	Directly Operated								
Commuter Bus	Directly operated								
Does the agency provide transit services on behalf of another transit agency or entity?	No	Description of Arrangement(s)							

System Description

LRTA's Agency Safety Plan (ASP) describes the four components integral to the successful implementation of a safety management System (SMS).

The FTA defines SMS as:

"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."

Furthermore, SMS is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry's existing safety foundation to better control risk, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully.

LRTA's SMS has four distinct components, which are discussed in subsequent sections to this safety plan:

- a. Safety management policy
- b. Safety risk management
- c. Safety assurance
- d. Safety promotion


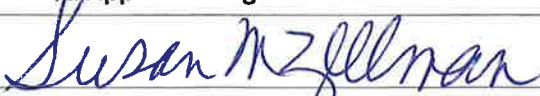
Our History

The Beaufort-Jasper Regional Transportation Authority was established in 1978 under the Regional Transportation Authority Law, Section 58-25-10 et seq. Code of Laws of South Carolina (1976) as the primary public transportation provider for Beaufort and Jasper counties. Transportation was provided to the public for commuting to various jobs on Hilton Head Island and points in-between. In 1984 three additional counties were added to the Authority, including Allendale, Colleton, and Hampton. To reflect the addition of these counties, the name was changed to Lowcountry Regional Transportation Authority (LRTA). Additional services included Medicaid transportation, Job Training Partnership Act (JTPA) transportation, vanpooling, and human service agency transportation. A demand response (dial-a-ride) service was initiated in 1997 in Beaufort County, and additional human service agency transportation was provided for Programs for Exceptional People, Beaufort-Jasper Comprehensive Health, the Technical College of the Lowcountry and others. Currently, the Lowcountry Regional Transportation Authority transports an average of 22,304 passengers a month and logs 87,700 miles monthly. In April 2000, the LRTA Board of Directors asked Beaufort County to take over management of the Lowcountry Regional Transportation Authority. Coach USA Transit Services was selected as the transit management company for the LRTA and began managing the Authority in January 2001. Coach USA Transit Services was purchased by First Transit, and the contract with First Transit ended in December 2017. Lowcountry Regional Transit Authority employs the management of the system.

Board of Directors

The LRTA is a political subdivision of state government consisting of five counties. The Board consists of appointees from the respective member counties in which the appointee resides. A Chairman, Vice-Chairman, and Executive Director comprise the Board Executive Committee. Other committees include Operations, Maintenance, Finance, Marine Division, and Nominating.

2. Plan Development, Approval, and Updates

Name of Entity that Drafted this Plan	Lowcountry Regional Transportations Authority (LRTA) dba Palmetto Breeze	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
		5/27/2020
Approval by the Board of Directors or an Equivalent Authority	Board Approval – Signature of Chairman	Date of Approval
		5/27/2020
	25 Benton Field Road, Bluffton SC 29910	
A copy of the LRTA's Board of Director Minutes from 05/27/2020 approving LRTA's Agency Safety Plan is maintained on file by the Executive Director and Chief Safety Officer.		
Certification by State Department of Transportation		

Annual Review and Update of the Public Transportation Agency Safety Plan

Our Agency Safety Plan will be jointly reviewed and updated by our Chief Safety Officer by July 1st of each year. The Accountable Executive will review and approve any changes, sign the new Agency Safety Plan, and forward to the LRTA's Board of Directors for final review and approval.

3. Safety Performance Targets

Safety Performance Targets (SPT)

LRTA includes Safety Performance Targets in this safety plan. These targets are specific, numerical targets set by LRTA and based on the safety performance measures established by FTA in the National public transportation safety plan.

The seven SPT's are:

- Total number of reportable fatalities.
- Rate of reportable fatalities per total vehicle revenue miles.
- Total number of reportable injuries.
- Injuries Rate per total vehicle revenue miles.
- Total number of reportable Safety events.
- Rate of reportable safety events per total vehicle revenue miles.
- System reliability.

The targets listed below are based on reviews of the previous five years of LRTA's safety performance data.

Mode of Transit Service	Fatalities (total)	Fatalities (per 100 thousand VRM)	Injuries (total)	Injuries (per 100 thousand VRM)	Safety Events (total)	Safety Events (per 100 thousand VRM)	System Reliability (VRM / failures)
Fixed Route	0	0	6	1	12	2	6
Commuter Bus	0	0	1.5	.25	6	1	2
Demand Response	0	0	6	1	12	2	6

Safety Performance Target Coordination

LRTA's Accountable Executive shares our Agency Safety Plan, including safety performance targets, with the Lowcountry Council of Governments (COG) each year after its formal adoption by the LRTA Board of Directors. The Accountable Executive also provides a copy of our formally adopted plan to the South Carolina Department of Transportation (SCDOT). LRTA personnel are available to coordinate with SCDOT and its MPO in the selection of SCDOT and MPO safety performance targets upon request.

Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	South Carolina Department of Transportation	
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Lowcountry Council of Government	

4. Safety Management Policy

LRTA Safety Management Policy Statement (SMPS)



May 27, 2020

The management of safety is one of our core business functions. Lowcountry Regional Transportation Authority (LRTA) is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all our transit service delivery activities take place under a balanced allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting established standards.

All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the Executive Director.

LRTA commits to:

- *Support the management of safety through the provision of appropriate resources that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;*
- *Integrate the management of safety among the primary responsibilities of all managers and employees.*
- *Clearly define for all staff, managers, and employees, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of our Safety Management System.*
- *Establish and operate hazard identification and analysis, and safety risk assessment activities, including an employee safety reporting program as a fundamental source for safety concerns and hazard identification, in order to eliminate or mitigate the safety risk of the consequences of hazards resulting from our operations or activities to a point which is consistent with our acceptable level of safety performance.*
- *Ensure that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.*
- *Comply with, and wherever possible exceed, legislative and regulatory requirements and*

standards.

- *Ensure that sufficient skilled and trained human resources are available to implement safety management processes.*
- *Ensure that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills.*
- *Establish and measure our safety performance against realistic and data-driven safety performance indicators and safety performance targets.*
- *Continually improve our safety performance through management processes that ensure that appropriate safety management action is taken and is effective.*
- *Ensure externally supplied systems and services to support our operations are delivered and meet our safety performance standards.*

Mary Lou Franzoni

*Mary Lou Franzoni,
Executive Director/Accountable Executive*

Safety Management Policy Communication

The Chief Safety Officer (CSO), introduced the Safety Management Policy principles to our staff during the employee safety meetings. A hard copy of the SMPS was provided to each employee during the meeting. A copy of the SMPS has also been posted on the Safety Bulletin Boards and CCTV. LRTA has also added a review of the SMPS to all new-hire training.

Authorities, Accountabilities, and Responsibilities

Role and Responsibilities of the Accountable Executive

LRTA's Accountable Executive has ultimate responsibility for carrying out the Agency Safety Plan (ASP). The Accountable Executive has control or direction over the human and capital resources needed to develop and maintain this Agency Safety Plan.

The Accountable Executive is accountable for ensuring that LRTA effectively implements its SMS throughout the agency and addresses SMS substandard safety performance. The Accountable Executive is responsible for signing SMS implementation planning documents and endorsing SMS implementation team members.

The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for LRTA's safety performance cannot be delegated and always rests with the Accountable Executive.

The LRTA Accountable Executive's roles include, but are not necessarily limited to:

- Decision-making about human and capital resources needed to support asset management, SMS activities, and capital investments.
- Maintaining the Transit Asset Management (TAM) Plan.
- Signing SMS implementation planning documents and ensuring that SMS is effectively implemented throughout LRTA's public transportation system.
- Ensuring action is taken to address substandard performance in LRTA's SMS.
- Endorsing SMS implementation team membership.

Role and Responsibilities of the Chief Safety Officer

The LRTA Executive Director, who serves as the Accountable Executive, designates the Director of Safety and Training as Chief Safety Officer (CSO). The Accountable Executive relies on the Director of Safety and Training/CSO to oversee safety-related activities at LRTA. The CSO has direct access to the Accountable Executive for SMS-related activities.

The CSO has the following authorities, accountabilities, and responsibilities under this plan:

- Develops LRTA's ASP and SMS policies and procedures.
- Advises the Accountable Executive on SMS progress and status.
- Oversees implementation and operation of LRTA's SMS.
- Identifies substandard performance in LRTA's SMS and develops action plans for approval by the Accountable Executive.
- Ensures LRTA's policies are consistent with LRTA's safety objectives.
- Establishes and maintains LRTA's Safety Risk Register and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents, and accidents.

- Ensures and helps carry out day-to-day implementation and operation of LRTA's SMS.
- Manages LRTA's Employee Safety Reporting Program (ESRP).
- Chairs the LRTA's Safety Committee and:
 - Coordinates the activities of the committee.
 - Maintains and distributes minutes of committee meetings.
- Ensures LRTA's policies are consistent with LRTA's safety objective.
- Provides SRM expertise and support for other LRTA personnel in conducting and overseeing Safety Assurance activities.

Agency Leadership and Executive Management Roles

Agency leadership and executive management also have authorities and responsibilities for day-to-day SMS implementation and operation of LRTA's SMS under this plan. LRTA Agency Leadership and Executive Management include:

- Director of Operations
- Director of Maintenance
- Director of Finance
- Mobility Manager

LRTA's Leadership and Executive Management personnel have the following authorities, accountabilities, and responsibilities:

- Assist in hazard identification, safety risk assessment, safety risk mitigation, safety performance monitoring, safety performance measurement, safety training, and safety communication activities.
- Supports the Chief Safety Officer in day-to-day implementation and operation of LRTA's SMS.
- Support the Chief Safety Officer in guiding the development, implementation, and operation of LRTA's SMS.

Key Staff Roles

Safety Committee

LRTA has designated our Safety Committee (SST, Safety Solutions Team) to serve as our key staff to support implement and operate the agency's SMS. LRTA's Safety Committee/Key Staff include the following persons:

- Executive Director
- Director of Operations
- Director of Maintenance
- Director of Finance
- Director of Safety & Training
- Mobility Manager
- Human Resources Administrator
- Driver Supervisor
- One Dispatcher
- One Maintenance Technician
- Vehicle Operators

LRTA uses the Safety Committee (SST), as well as the weekly Departmental Managers Meeting, Monthly All-Staff Meetings and Safety Announcements, to support our SMS and safety programs.

The Safety Committee meetings are conducted monthly. During the Safety Committee (SST) meetings, safety events and current hazard issues are reviewed and analyzed.

Subject Matter Experts

Subject matter experts play a valuable role in hazard identification, safety risk assessment, safety risk mitigation, and safety performance monitoring activities. These subject matter experts may include:

- Directors
- Managers
- Supervisors
- Dispatchers
- Vehicle operators
- Vehicle mechanics
- Other skilled professionals as needed.

Employee Safety Reporting Program

LRTA has established and implemented a formal safety reporting program that allows its employees to voluntarily report their safety issues, concerns, or conditions they may see during their day-to-day delivery of transit services. This voluntary safety reporting program is separate from LRTA mandatory reporting requirements for accidents and incidents.

The employee safety reporting program (ESRP) provides protections for employees who report safety issues, concerns, or conditions and ensures that discipline will not be applied, and employees have protection against reprisal or any other adverse action for reporting a safety issue, concern, or condition.

The ESRP also describes employee behaviors that are not protected and may result in disciplinary action, such as an employee engaged in an illegal act, one that has committed gross negligence, or deliberately or willfully disregarded regulations or LRTA'S procedures. These behaviors are listed in the employee handbook. Employees who report safety issues, concerns, and conditions are also generally protected under Occupational Safety and Health Administration whistleblower protections.

The ESRP clarifies:

- What to report, what not to report, and how to report.
- What managers/supervisors should do when employees report safety concerns.
- How reports are documented.
- How employees will receive feedback about the results of their reports.

The reporting system is simple to use and available to all LRTA personnel. LRTA's employee safety reporting program policy addresses the following:

- Who is responsible for developing and managing the employee safety reporting program?
- Timely response to employee safety reports.
- How the agency provides feedback to employees on the action(s) taken to address the reported safety issue, concern, or condition.
- Investigation of reported safety issues, concerns, or conditions for causal or contributing factors.
- How the transit system documents and reviews safety issues, concerns, or conditions to determine if a hazard exists.
- If the issue is determined to be a hazard, how the hazard is then entered into the safety risk have management process.

We are committed to providing feedback to our employees who report a safety issue, concern, or condition. This feedback is provided either directly in a one-on-one conversation or through the safety meeting platform. The feedback addresses what, if any, action(s) will be taken to address the reported safety issue, concern, or condition.

We have established a non-punitive ESRP. The below outlines the process by which team members are to report any safety issues, concerns, or conditions.

1. LRTA has a safety reporting box at our location with the reporting forms attached to the box. This box is used to report any safety issues, concerns, or conditions that employees may encounter. It is the responsibility of the employee to write up the safety issue, occurrence, or condition on the safety form and then place it into the safety reporting box or give it to the Director of Safety.
2. Employees, passengers, and the general public will have access to our website and social media platform whereby comments can be left online, which are retrieved by the website administrator. Employees, passengers, and the public may also call into our dispatching center to report any concerns. The dispatchers, in this case, are responsible for logging any safety issues, concerns, or hazards onto the form and placing them in the safety reporting box or delivering to the Director of Safety.
3. LRTA has also established an email address for reporting safety issues, concerns, or conditions: safety@palmettbreezetransit.com. The Director of Safety and Director of Operations monitor this email address.
4. The Director of Safety checks the safety reporting box daily.
5. Employees are notified of action(s) taken about reported safety issues, concerns, or conditions.

More detailed documentation of the ESRP is kept in the CSO's office. We ensured that a description of the ESRP was provided to all current employees during the orientations on employee safety reporting. New employees receive information on our ESRP during new-hire orientation.

5. Safety Risk Management

LRTA uses the Safety Risk Management (SRM) process as a primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. It is a process wherein hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to LRTA'S leadership. The LRTA SRM process allows us to carefully examine what could cause harm and determine whether we have taken precautions to minimize the harm, or if further mitigations are necessary.

The CSO leads the SRM process, at times working with the Safety Committee to identify hazards and consequences, assess the safety risk of potential consequences, and mitigate the safety risk. The results of the SRM process are documented in the Safety Risk Register and referenced materials.

The SRM process applies to all elements of the system, including operations, maintenance, facilities, vehicles, personnel recruitment, employee training, and supervision.

Overall, the LRTA SRM process includes the following steps that are carried out by the CSO, with input from applicable subject matter experts:

- a. Identify hazards.
- b. Identify the potential consequences of each hazard.
- c. Evaluate consequences in terms of probability and severity.
- d. Prioritize risk using our formal risk matrix.
- e. Communicate prioritized risk to the Accountable Executive.
- f. Based on the Accountable Executive's approval, create safety risk mitigations to eliminate or reduce the effects of hazards.
- g. Implement the mitigation.
- h. Create a strategy for monitoring mitigation effectiveness.

In carrying out the SRM process, LRTA uses the following terms:

- **Safety event** – Any accident, incident, or occurrence.
- **Hazard** – Any real or potential condition that can cause injury, illness, death, damage to/loss of facilities, equipment, rolling stock, or infrastructure belonging to LRTA, or damage to the environment.
- **Risk** – Composite of predicted severity and likelihood of the potential effect of a hazard.
- **Risk Mitigation** – Method(s) to eliminate or reduce the effects of hazards.
- **Consequence** – An effect of a hazard involving injury, illness, death, or damage to LRTA property or the environment.

The steps LRTA takes in carrying out SRM activities include but are not limited to:

1. The CSO reviews reported safety issues, concerns, or conditions to determine if they are hazards that need to be put through the SRM process.
2. The CSO will confer with the involved department head to address the identified hazards and bring in other department heads if it affects other departments.
3. The timeframe to resolve identified hazards will be determined based on the Hazard Code Scale and the affected department(s).
4. The CSO will report the hazard(s) on the Hazard Log form and post on the Safety Board and CCTV.

5. The CSO will continually monitor the hazard until it is mitigated to an acceptable level and post the mitigation and/or update to the employees on the safety board and CCTV.
6. Before closing out the safety hazard, it will be determined by the CSO, responsible department head(s), and/or safety committee if/how the resolution needs to be monitored for effectiveness, revisions, and/or final resolution taking it through the risk management process.
7. Safety hazards will be logged, and the CSO will review the logged safety hazards periodically to determine any trends, such as similar occurrences, conduct any risk management assessments, and report findings to the Accountable Executive.

Safety Hazard Identification

All subsequent safety risk management activities are contingent on effectively identifying sources for hazard identification, and the processes to obtain information on hazards.

LRTA has methods and processes to identify hazards and consequences of the hazards. As a source for hazard identification, LRTA considers data and information provided by its Board of Directors, the FTA, and the SCDOT. LRTA also considers the results of its asset condition assessments when performing safety hazard identification activities through its SMS. The results of the condition assessments and safety risk management activities help inform LRTA's determination as to whether an asset meets the state of good repair standards under 49 CFR Part 625.

The CSO is responsible for overseeing LRTA's hazard identification process. This individual is responsible for facilitating the hazard identification process and documenting identified hazards and ensuring that subject matter experts identify the potential consequences of those hazards. Information related to hazard identification and consequence determination is stored in the LRTA Safety Risk Register, which is a spreadsheet that allows for the documentation of all identified safety hazards and the subsequent activities related to addressing those hazards. This risk register is maintained by the CSO.

The safety hazard identification process offers LRTA the ability to identify hazards and potential consequences in the operation and maintenance of the system. Hazards are identified through a variety of sources, including:

- LRTA employee safety reporting.
- Review of vehicle camera footage, if available.
- Review of monthly performance data and safety performance targets.
- Observations from supervisors.
- Maintenance reports.
- Observations from customers, passengers, and third parties.
- Reviews of information concerning bus operator assaults.
- Safety Meetings.
- Safety Committee Meetings (SST).
- Results of audits and inspections of vehicles and facilities.
- Results of training assessments.
- Results of internal safety audits.
- Investigations into safety events, incidents, and occurrences.
- Road condition reports.
- FTA and other oversight authority agencies.

The CSO reviews these sources for hazards and documents them in LRTA's Safety Risk Register. The CSO also enters hazards into the Safety Risk Register from reviews of the LRTA operations and maintenance, results of audits and observations, and information received from FTA and other oversight authorities, including the National Transportation Safety Board.

The CSO may conduct further analysis of hazards and consequences entered into the Safety Risk Register to collect information, identify additional consequences, and to inform management which hazards should be prioritized for safety risk assessment. In following up on identified hazards, the CSO may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard.
- Conduct a walkthrough of the affected area, assess the possible hazardous condition/s, generate visual documentation (photographs and/or video), and take any measurements that are deemed necessary.
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard.
- Review any documentation associated with the hazard, such as records, reports, procedures, inspections and technical documents.
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard.
- Review any previously reported hazards of a similar nature.
- Evaluate tasks and/or processes associated with the reported hazard.

Any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately be brought to the attention of the Accountable Executive and addressed through the SRM process for safety risk assessment and mitigation. This signifies the CSO's belief that immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of the Environmental Protection Agency or SCDOT environmental protection standards.

LRTA involves subject matter experts in safety hazard identification processes by matching the experience and expertise of the individual(s) with the type of hazard to be analyzed. The CSO and the agency's leadership and executive management team will collectively select the SME for each department. For example, if the hazard is operations related, then the primary subject matter experts will be from operations; if the hazard is vehicle maintenance related, that type of hazard requires vehicle maintenance expertise and skills.

Determination of the potential consequences of hazards drives our safety risk assessment activities. Hazards in and of themselves do not cause damage. It is the consequences of hazards that cause injuries and death, destroy property, harm the environment, or impair the ability of a transit provider to deliver transit services. LRTA subject matter experts identify the potential consequences of hazards, keeping in mind that a single hazard could have many potential consequences. Each potential consequence is identified and recorded.

To determine the potential consequences of an identified hazard, the CSO meets with the SME(s) from the department in which the identified hazard is rooted. During this meeting, they list all the potential consequences of the hazard and record them on the Risk Mitigation Form.

The CSO is responsible for ensuring that the documentation of hazards and consequences is taking place. This documentation is stored in the CSO's office.

Safety Risk Assessment

LRTA has established processes to assess the safety risk associated with identified safety hazards. These safety risk assessment processes include an 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.

Assessing the likelihood and severity of hazard consequences is the first step in prioritizing safety risk. LRTA established procedures for assessing the safety risk of the consequences of identified safety hazards and prioritizing the hazards based on this safety risk. The agency assesses safety risk in terms of likelihood (the probability of a consequence occurring) and severity (the seriousness of a consequence, if it does occur). A color-coded safety risk index provides a rating system to use with a safety risk assessment matrix to prioritize safety risk. The safety risk assessment matrix helps us determine the probability and severity of consequences and allows for prioritization of safety risk. The safety risk assessment risk matrix used by LRTA is presented in Appendix E: Safety Risk Assessment Matrix.

LRTA chooses subject matter experts to involve in safety risk assessment by matching the experience and expertise of subject matter experts with the type of hazard under assessment. This assessment is carried out under the guidance of the CSO using LRTA's safety risk assessment matrix.

Safety risk prioritization is linked to safety risk mitigation creation. Prioritizing our safety risk provides the Accountable Executive with the information needed to make decisions about resource application. It helps LRTA apply its limited time, financial, and human resources to the highest priority transit safety risk.

The Accountable Executive, with input from the CSO, is the ultimate decision-maker on applying resources to mitigate high priority transit safety risk. Therefore, high priority transit safety risks are communicated to the Accountable Executive. LRTA defined and documented this process that includes criteria for when high priority transit safety risks need to be elevated to the Accountable Executive. Responsibility for communicating to the Accountable Executive resides with the CSO.

Safety Risk Mitigation

Developing safety risk mitigations to proactively reduce the agency's safety risk is the culmination of the safety risk management process. LRTA has established processes to identify mitigations or strategies necessary, as a result of its safety risk assessment activities, to reduce the likelihood and severity of its consequences. The CSO is responsible for guiding and overseeing the Safety Risk Mitigation process. Also, the CSO is responsible for directing the activities of the subject experts during the risk mitigation process. Safety risk mitigations requiring additional resources or changes in agency policy are approved by the LRTA Accountable Executive.

All hazards and safety inquiries will be reviewed by the CSO and SMEs to determine the corrective actions for the mitigation. The same SMEs will also monitor the status of the mitigation until completion. When there is a major hazard, the entire Safety Committee (SST) is brought in for a meeting concerning the hazard.

LRTA has established procedural steps for creating safety risk mitigations to address the potential consequences of its prioritized risk. The steps include how LRTA determines when safety risk mitigation is necessary, and the job function(s) or position(s) that is responsible for creating mitigations. Within this documentation, LRTA references any forms used to create mitigations and describes how it will record the results of this activity and where these recorded results are stored or maintained. LRTA understands that the goal of a mitigation is to reduce assessed safety risk to an acceptable level. It is unrealistic that a transit operation can assume that it will be able to eliminate all safety risk.

LRTA's safety risk mitigation steps include:

- Examining the consequences of hazards and their probability and severity.
- Develop strategies to reduce the probability and/or severity of those consequences.
- Ensure the strategy can be realistically implemented with available resources.
- Turn the strategy into a mitigation plan.
- Put the mitigation plan into place.
- Create a plan for monitoring the effectiveness of the mitigation.

After creating a safety risk mitigation, the CSO, with the involvement of subject matter experts, develops and documents a strategy for implementing the mitigation. These implementation strategies include:

- Who is responsible for implementing the mitigation?
- Where the mitigation will reside within agency activities.
- How the mitigation will be implemented.
- How long implementation should take.

LRTA needs to know that its mitigations are working. When we develop a mitigation, we also define and document the way the mitigation will positively impact safety performance so that we can then monitor whether that positive impact is taking place and if the mitigation is effective. Under the direction of the CSO, the subject matter experts involved in creating a safety risk mitigation also decide on the best ways to monitor the effectiveness of the mitigation being implemented. This includes developing and documenting monitoring strategies. LRTA creates strategies for monitoring the effectiveness of mitigations. These strategies provide consistency in monitoring activities, regardless of whether the mitigation is implemented in operations, maintenance, or administration.

LRTA understands that successful mitigation implementation and monitoring activities depend on having a process for how it will formally communicate mitigation and monitoring strategies to operations, maintenance, or administration staff who will implement and monitor the mitigations. LRTA has documented this process under the guidance and facilitation of the CSO. This communication feeds cross-functional ownership in SMS processes since employees who create the mitigations may not be the same employees that implement and monitor the mitigations.

Strong documentation of safety risk mitigations feeds safety performance monitoring. LRTA has established and documented how it will record all its various safety risk mitigation activities and their outcomes. Within this process, LRTA references any forms that it uses during safety risk mitigation activities and where the completed records of safety risk mitigation activities are stored.

Safety Risk Management Documentation

The documented SRM processes for hazard identification, safety risk assessment, and safety risk mitigation are on file in the CSO's office. The CSO also maintains the documentation of the results of the SRM activities that we carry out.

6. Safety Assurance

LRTA has established processes to:

- Monitor its operations for compliance with and competence of its policies and procedure.
- Monitors external vehicle maintenance providers to ensure that they are performing maintenance, which is consistent with LRTA's ability to safely meet its operational requirements.
- Monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or that were not implemented as intended
- Conduct investigations of safety events to identify causal factors.
- Monitor the effectiveness of its employee safety reporting program.

LRTA has a system to document the activities as we monitor our system for compliance within our operations and maintenance policies and procedures. To document this process, we use checklists or forms during the monitoring activities and to record the results of monitoring activities.

Safety Performance Monitoring and Measurement

LRTA has many processes in place to monitor its entire transit system for compliance with operations and maintenance procedures, including:

- Safety audits.
- Informal inspections.
- Review of on-board camera footage to assess drivers and specific incidents.
- Safety surveys.
- Investigation of safety occurrences.
- Safety review prior to the launch or modification of any facet of service.
- Daily data gathering and monitoring of data relating to the delivery of service.
- Regular vehicle inspections and preventative maintenance.

Internal reviews are performed to ensure that all areas of LRTA are in compliance with external regulatory requirements and our internal policies and procedures. The major issues and activities involved in performing the internal safety review include:

- Examination of documentation.
- Analysis of safety data and information.
- Observation of equipment, facilities and in-process tasks.
- Evaluation of system operations policies and procedures.
- Interviews with management and relevant staff.
- Examination of maintenance procedures and recall information.

Results from the above processes are compared against recent performance trends both quarterly and annually by the CSO to determine where corrective actions need to occur. The CSO enters any identified non-compliant or ineffective activities, including any resulting mitigations, back into the SRM process for reevaluation by the Safety Committee.

All monitoring activities and their results are formally documented, with documentation stored in the CSO's office.

The monitoring is done based on a yearly schedule created by the CSO.

Operations Monitoring

LRTA has checklists and forms that it uses to drive and document its operations monitoring activities.

The Operational Area is monitored by the Director of Operations. The following operational areas are monitored for compliance with policies and procedures:

- Bus operator pre-trip inspections
- Bus operator behind-the-wheel performance
- Bus operator passenger assistance
- Bus operator emergency response
- Dispatch emergency response
- Dispatch passenger assistance response
- Driver Supervisors Activity

When LRTA's monitoring activities determine lack of compliance with operations policies and procedures or inadequacies of those policies and procedures, it then uses this information to feed LRTA's hazard identification and safety risk assessment process.

Within these documented processes, LRTA describes:

- The job functions responsible for the different areas of field observations.
- How it will record the results of field observations.
- Where these records are stored.
- How it will address hazards or safety issues identified during field observations.

Field Observations are performed by the Director of Operations and Driver Supervisor twice a year on each Vehicle Operator to determine if corrections are needed or procedures revamped. These observations are recorded on the Behind the Wheel Performance Form, which is also used to measure the performance of the operator during their new hire training and any future refresher training. The form also becomes a part of the employee's performance evaluation.

Field Observations' findings are also used as a refresher training for operations staff. Once the processes have been completed, a review of the findings is done by the CSO to determine what and if the correct action has been taken.

Documentation of all operation monitoring activities are stored in the office of the Director of Operations and shared with the CSO.

Vehicle Maintenance Monitoring

The Maintenance Area is monitored by the Director of Maintenance. The following maintenance areas are monitored for compliance with policies and procedures:

- Adherence to Preventive Maintenance Schedules
- Mechanic Preventive Maintenance Activities and Performance
- Mechanic Corrective Maintenance Activities and Performance
- Number of Maintenance Related Vehicle Road Calls and Mechanic Performance during Road Calls

The Director of Maintenance regularly monitors and documents mechanic preventive and corrective

maintenance performance. We use this information to drive mechanic coaching, training, and discipline.

The Director of Maintenance documents all vehicle maintenance monitoring activities and results. This documentation is stored at the vehicle maintenance facility and shared with the CSO.

Facility Safety Inspections

Facility Safety Inspections are recorded in a checklist located in the maintenance policies and procedures manual. All deficiencies are brought to the attention of the Director of Maintenance. The Director of Maintenance then goes into the evaluation process to correct the deficiency. Depending on what the reporting issues are, the CSO will be called to discuss the issue.

LRTA conducts periodic inspections to ensure the safety of our main office and maintenance facilities. The inspections are to ensure that the functions of all locations comply with all safety and hazard procedures and policies.

The inspections include a monthly fire hazard and fire extinguisher inspections at the main office, bus transfer centers, and our maintenance facilities by the Director of Maintenance or designee as well as an outside source for our yearly fire extinguisher testing. All other inspections of the facilities are conducted by our maintenance staff. The maintenance technicians utilize checklists to perform safety inspections.

Any deficiencies found are forwarded to the Director of Maintenance, who will then correct the deficiency during the evaluation process. Depending on the issue, the CSO may be called in to discuss the issue for final decision on the resolution.

Periodically we outsource for contractors to come in to do HAZMAT inspections, facility audits, and shop walk-through inspections. These contractors include but are not limited to OSHA, State agencies, and our insurance carriers.

Hard copies of inspections are stored in the Maintenance Department.

Field Observations of Service Delivery

LRTA has documented processes that it uses to conduct field observations of safety-related aspects of the following elements of service delivery:

- Bus stops.
- Bus transfer locations.
- Fixed-route schedules and service delivery.
- Commuter bus schedules and service delivery.
- Paratransit/demand response scheduling.
- Service delivery.

Field Observations are conducted by the Director of Operations and the Driver Supervisor. Checklists are used to perform route observations for safety concerns or route effectiveness.

LRTA honors flag stops on all routes. The flag stops and our assigned stops are not marked, but they are designated. Our drivers have been trained to operate and perform their routes in a safe manner when stopping for a passenger at a flag stop.

Risk Mitigation Monitoring

The CSO is responsible for monitoring operations to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended. The actual field monitoring of the mitigations is often carried out by subject matter experts, including those that assisted in the creation of the mitigation of the SRM process.

LRTA documents how it carries out these monitoring strategies to periodically assess the effectiveness of safety risk mitigations.

Activities to monitor the effectiveness of safety risk mitigations ultimately assist LRTA in determining whether:

- The existing mitigation is working as desired.
- The existing mitigation needs some modification to work as desired.
- The existing mitigation is not working and needs to be replaced.
- The existing mitigation is no longer needed.

The results of mitigation monitoring activities are made available for further safety risk management activity if needed.

The CSO will document the monitoring of all mitigations. The documentation will be kept up to date by the CSO. The CSO will also monitor the status of mitigations for timely implementation.

Safety Event Investigation

Responsibility for LRTA's safety event investigation process is shared by the Director of Operations and the CSO. Actual performance of safety event investigations, including identifying causal factors, involves not only the CSO and Director of Operations but also LRTA Driver Supervisors. Depending on the nature of the event, the Director of Maintenance may also be involved in the investigation.

Safety event records provide critical baseline information to support SMS implementation, operation, and safety performance target achievement.

LRTA has documented procedures for safety event investigation. LRTA has forms, consistent with industry standards, that it uses to document safety events, as well as the subsequent investigation. The safety event documentation is on file in the CSO's office.

After a safety event investigation is complete, LRTA management, subject matter expert, and the Safety Committee (SST) determines whether the accident was preventable or non-preventable and, based on these findings, determine whether discipline of employee(s) involved is required.

LRTA takes the process a step further and performs causal analysis of safety events to help determine if latent organizational factors, beyond individual employee behavior, may have contributed to the event. The results of causal analysis are documented on a causal analysis form. Records of the results of the analysis of the forms are kept in the CSO's office.

Results of this analysis for causal factors provide potential hazard identification information that may need to be put through LRTA's safety risk management process to reduce the potential risk of recurrence of a similar accident or incident.

Employee Safety Reporting Program Monitoring

An effective ESRP supports hazard identification. The CSO has ultimate responsibility for monitoring the transit agency's internal employee safety reporting program.

LRTA has established and documented the activities it uses on an ongoing basis to monitor whether its ESRP is effective and achieving desired outcomes. Within this process, LRTA established criteria that will help determine if the program is performing as desired. Some of the criteria include: volume of reports received, the value of reports received, response to reports received in terms of hazard identification, risk assessment and risk mitigation, how information gathered from the ESRP is shared and communicated, and the timeliness and accuracy of feedback provided to employees who reported a safety issue or concern.

Documentation on all aspects of monitoring LRTA's safety reporting program is stored in the SMS CSO office.

Safety Performance Measurement

LRTA is committed to periodically measure its safety performance. The CSO is responsible for measuring LRTA's safety performance. This measurement includes using not only safety performance indicators to measure the achievement of our safety performance targets, but also how well we do in addressing safety risk within every aspect of our service delivery.

Documentation of periodic performance measurement results is on file in the CSO's office.

7. Safety Promotion

Competencies and Training

Under the guidance of the CSO, the individuals who conduct training delivery, has the day-to-day responsibility for the development, delivery, and documentation of all SMS-related safety skill competencies and SMS training.

LRTA has established competencies and training for all personnel directly responsible for safety. Training is provided to employees at hire and on an ongoing refresher basis.

Training Needs Analyses

LRTA periodically conducts training needs analyses to ensure that its training is up to date, and addresses critical, safety-related concerns. It carries out these training needs analyses by doing the following:

- Reviewing existing job descriptions.
- Identifying which positions have direct responsibility for determining when safety training is needed.
- Determining what SMS roles, responsibilities, and processes are missing from job descriptions
- Updating job descriptions to reflect SMS practices.

The training needs analysis looks at the position and skills required to ensure the training lines up to what the employees need.

New-Hire Bus Operator Training Program

LRTA revised its Vehicle Operator manual to be a training manual to reflect updated work procedures with learned routes certification to include refresher training to aid in evaluations and job performance and safety effectiveness. Bus evacuation training is held with the use of a P.A.S.S. training video and hands-on training utilizing three different size vehicles. A master training syllabus was created to include a training calendar to be maintained and controlled by the CSO; this training is monitored to determine if adjustments or corrective actions need to be made.

Content of new-hire bus operator training program includes but is not limited to:

- Equipment familiarization.
- Defensive driving.
- Pre- and post-trip inspection procedures.
- Reporting vehicle defect procedures.
- Radio communication.
- Fare management.
- Customer service and sensitivity.
- Passenger assistance and securement.
- Managing aggressive/dangerous passenger behavior.
- Safety equipment requirements.
- Safety event management and reporting.
- Emergency evacuation procedures.
- Route knowledge.

New-hire bus operator training includes a combination of classroom training, hands-on training with a

training instructor, and behind-the-wheel training with an experienced operator.

Bus Operator Refresher Training

LRTA presently provides periodic bus operator refresher training on a variety of topics. LRTA has lesson plans, agendas, and sign-in sheets to document the content of refresher training and individual attendance at that training. These documents are on file at the LRTA CSO's office.

LRTA has a refresher checklist for all vehicle operators, which coincides with the training schedule for providing hands-on training and refresher classroom training on procedures.

LRTA also provides retraining for Bus Operators for performance deficits.

Driver Supervisors and Dispatch Training

Supervisors and dispatchers play a critical role in identifying and responding to hazards and helping to both proactively and reactively mitigate risk. Training for driver supervisors and dispatchers consists of formal supervisor and dispatcher training and also includes mentoring, coaching, and on-the-job training.

Mentoring, coaching, and on-the-job training are very appropriate training approaches, but ones that need to be guided by a structured agenda of topics. LRTA has developed checklists with topics for experienced supervisors and dispatchers to use during on-the-job training, coaching, and mentoring of trainees.

These checklists are also used to document an employee's satisfactory completion of the training and include instructor and trainee signatures and the dates the training took place. These documents are kept on file at the LRTA CSO's office.

Maintenance Training

The Director of Maintenance regularly coaches mechanics on required maintenance skills and formal training as they carry out their job responsibilities.

This training includes:

- Lock Out / Tag Out
- Pinch Point
- PPE
- Lift Training
- Wheelchair Training

SMS Orientation

A cross-functional and multi-level understanding of SMS supports all SMS-related activities. Successful SMS implementation and operation require employee involvement and ownership at every level of the agency and within every service-delivery related function. Employees need to understand SMS; what their role is within SMS; and how they, the organization, and customers benefit from SMS success. This knowledge will nurture employee "buy-in."

LRTA has presented SMS orientation sessions for all employee functions and addressed the implications of SMS for all agency functions. LRTA has also plugged information on SMS into all new-hire employee orientations. Documentation of these orientations, including agenda of topics covered, signatures of trainer/trainee, are kept on file in the CSO's office.

Safety Risk Management Orientation for Subject Matter Experts

Successful proactive safety risk mitigation begins with subject matter experts who have a clear understanding of their responsibilities and the skills required to carry them out.

Employees who participate in safety risk management activities as subject matter experts need to understand how to carry out their responsibilities. The CSO makes sure that subject matter experts are orientated on their safety risk management responsibilities, the desired outcomes of safety risk management activities, and the importance of the effort to LRTA's safety performance.

Documentation of the orientation process, as well as the orientations themselves, includes how the agency:

- Assesses hazards for consequences.
- Conducts safety risk assessments.
- Creates safety risk mitigations.

Documentation on this ongoing activity is on file at the LRTA CSO's office.

Safety Performance Monitoring Orientation

The quality of safety performance monitoring is reflected in an agency's overall positive safety performance. Employees who participate in safety performance monitoring activities need to know how to carry out their responsibilities. The CSO makes sure that these employees receive orientations on what their responsibilities are, the desired outcomes of safety performance monitoring, and the importance of the effort to overall agency safety performance.

Orientations include how to perform monitoring activities of operations. Performance monitoring includes such activities as:

- Field observations to ensure operations and maintenance policies and procedures are being followed correctly.
- Assessing and documenting employee safety performance; monitoring the effectiveness of safety risk mitigations.
- Evaluating the effectiveness of the employee safety program.

Documentation of these activities is kept on file at LRTA CSO's office.

Orientation on Employee Safety Reporting Program

An effective employee safety reporting program is one of the most important tools for hazard identification.

LRTA's employee safety reporting program, at a minimum, provides the following information:

- The purpose and benefits of the program.
- Guidelines on the types of safety concerns and issues employees should report.
- The reporting methods available to employees (how to report).
- An explanation of how the information will be managed and shared.
- The protections for employees who report safety concerns.
- A description of the operational behaviors that are not protected and may result in discipline.
- The agency's commitment to providing feedback on reported safety concerns.

Agendas of the employee safety reporting program orientation and attendance records are on file at the LRTA CSO office.

Training Documentation

Training documentation is a source of hazard identification.

Training documentation provides formal proof that employees were trained and shows that employees received timely certification and recertification in critical skill areas. Up-to-date training documentation also assists LRTA in forecasting future training schedules. LRTA utilizes a master training folder which outlines the process for recording employee's completion of all SMS and skill-related training.

LRTA Training documentation includes:

- Records of training needs analysis for lesson plan development.
- Curricula for initial and refresher training.
- Training schedules and records of all completed training.
- Procedures for revising training materials.
- Course assessment materials.
- Copies of individual employee training records.

LRTA Records of course completion include:

- The dates training is held.
- Content covered during the training session.
- Length of the session.
- Training format.
- Signatures of instructor and trainee.

Records of training documentation and course completion are kept on file at the LRTA CSO's office.

Training Monitoring

LRTA regularly monitors its training to ensure effectiveness. Specifically, the training monitoring process addresses the following:

- Monitor training to make sure it delivers the necessary SMS skills and information.
- Establish a process for reviewing and revising training courses and consider review frequency, reviewers, and decision-making process for revisions.

The CSO, with assistance from the department heads, assesses the training to ensure the training is not out of date, and the CSO monitors the completion of all training recorded in the training log.

Post-training observations recorded on our route performance form are used to help measure the effectiveness of new-hire or refresher bus operator training.

Safety Communication

The CSO is ultimately responsible for ensuring the distribution and communication of safety and safety performance information throughout LRTA. The CSO is assisted in this responsibility by the appropriate directors, managers, and supervisors.

Safety communication provides a foundation to build SMS processes and activities. LRTA has ensured that all of its employees are aware of information relevant to their safety-related roles and responsibilities. This information includes explanations of changes to policies, activities, or procedures. LRTA has documented its overall approach to safety communication and supporting safety communication activities. This overall approach to safety communication is on file at the LRTA CSO's office.

In general, LRTA's documentation of safety communication includes details about:

- Objectives of the communication
- Content
- Target audience
- Format
- Frequency of the communication
- Ways to ensure communication was understood

LRTA communicates safety information utilizing our employee safety boards, monthly safety meetings or make up one-on-one meetings, subject matter experts, safety committee meetings, CCTV, and flyers which are distributed to every employee.

Safety Meetings

An effective employee safety meeting process provides a strong platform for safety-related communication and dialogue, identification of safety hazards, concerns, and issues, and the delivery of refresher training.

LRTA holds monthly employee safety meetings, which can include safety-related refresher training. Agendas for these meetings are comprehensively documented.

LRTA's document of its safety meeting process includes:

- How often we schedule employee safety meetings.
- The job functions that are required to attend meetings.
- How we choose topics to discuss during the meetings.
- How we address those topics within the employee safety meeting.

Organization-Wide Communication of Safety Hazard and Safety Risk Information

A goal of safety risk management processes is to reduce safety risk for employees and customers. Safety-sensitive employees are always vulnerable to the consequences of safety hazards within the transit environment. Timely reporting to employees of newly identified safety hazards and the safety risks those hazards present can help reduce that vulnerability.

LRTA has documented procedures for communicating hazards. The documentation of these procedures is on file at the LRTA CSO's office. The CSO is responsible for making sure this communication takes place.

Communication about Safety Risk Mitigations

LRTA is committed to informing employees at every level of operations about the safety risk mitigations it is putting into effect. The reasons it provides this information are:

- It tells employees that the transit agency is doing all it can to reduce risk.
- It brings attention to employee roles and responsibilities that may be affected by new mitigations.

- Informed employees are better situated to be a source of information on determining how well mitigations are working.

LRTA documents its procedures for communicating hazards. When new safety risk mitigations are put into place, SMEs aid in communicating these mitigations to employees.

Organization-Wide Communication of Agency Safety Performance

Transit agencies implement SMS to help them continuously improve their safety performance. Communicating agency safety performance information promotes employee "buy-in" to SMS processes, thus further improving the agency's overall safety performance.

LRTA employees should have ownership of safety. To reinforce this ownership, LRTA periodically communicates statistics on the agency's overall safety performance to all employees, regardless of job function. This includes providing information on LRTA's status related to achieving its safety performance targets. The Accountable Executive is responsible for taking the lead on this communication and making sure that it takes place.

LRTA has safety performance targets for each mode of bus transportation for our fixed routes, demand response, and commuter routes based on a five-year average. These performance targets are measured as safety events occur. We communicate the targets to our employees, no less than twice a year. We also post safety performance information on the safety boards in our employee break rooms and the operations building on CCTV.

LRTA has documented how it communicates safety performance information throughout its organization. This documentation is on file in the CSO's office.

Additional Information

LRTA will maintain documents that describe the programs, policies, and procedures it uses to carry out its agency safety plan. It will also maintain documents not included or referenced elsewhere in this safety plan, related to the implementation of the transit agency's SMS, as well as results from SMS processes and activities.

These documents will be maintained for at least three years after their creation and made available upon request by the FTA, other federal entities, or the SCDOT. The CSO will be a primary point of contact when providing Agency Safety Plan-related information to external agencies to ensure access to these documents.

Appendix A: Definitions

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

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

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

Event means any Accident, Incident, or Occurrence.

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

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

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

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

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

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

Performance target means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).

Public Transportation Agency Safety Plan means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

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

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

Safety event means any Accident, Incident, or Occurrence.

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

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

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

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

Safety performance target means a Performance Target related to safety management activities.

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

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

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

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

Small public transportation provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

State means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

State of good repair means the condition in which a capital asset is able to operate at a full level of performance.

Transit agency means an operator of a public transportation system.

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

Appendix B: Acronyms and Abbreviations

Acronym or Abbreviation	Meaning
ADA	Americans with Disabilities Act
ASP	Agency Safety Plan
CFR	Code of Federal Regulations
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
HAZMAT	Hazardous Materials
LCOG	Lowcountry council of Government
LRTA	Lowcountry Regional Transportation Authority
MPO	Metropolitan Planning Organization
PB	Palmetto Breeze
PTASP	Public Transportation Agency Safety Plan
SCDOT	South Carolina Department of Transportation
SMPS	Safety Management Policy Statement
SME	Subject Matter Expert
SMS	Safety Management System
SPT	Safety Performance Target
SRM	Safety Risk Management

Appendix C: LRTA Board of Directors ASP Approval Documentation

May 27, 2020 Board Meeting – Copy of Board Minutes Once Approved - YWB

Appendix D: Certification Documentation
SC DOT Certification Attached Here - YWB

Appendix E: LRTA Safety Risk Assessment Matrix

Risk Assessment Matrix

SEVERITY LIKELIHOOD	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)	Medium	Low	Low	Low

Severity of the Consequence		
Definition Category	Meaning	Value
Catastrophic	Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact that violates law or regulation, or monetary loss equal to or exceeding \$250,000.	1
Critical	Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least one person, property damage exceeding \$25,000 but less than \$250,000, system shut down lasting between 10 minutes and 4 hours, or reversible significant environmental impact causing a violation of law or regulation.	2
Marginal	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 without violation of law or regulation, or monetary loss up to \$25,000, or system shutdown of less than 10 minutes	3
Negligible	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 \$25,000.	4

<i>Qualitative Definition</i>	<i>Meaning</i>	<i>Value</i>
Frequent	Likely to Occur Frequently - more than once per month	A
Probable	Likely to Occur less than once per month but more than once per year	B
Occasional	Likely to Occur less than once per year but more than once per decade	C
Remote	Very Unlikely to Occur - once in the life of the system	D
Improbable	Almost inconceivable that the event will occur in the life of the system	E

Safety Risk Levels

Risk Assessment Matrix Color Code

<i>"Tolerability" based on identified severity and likelihood.</i>	
	Unacceptable under the existing circumstances.
	Acceptable based upon mitigations; monitoring is necessary.
	Acceptable under existing circumstances; with senior management approval.

Appendix F: LRTA Organizational Chart

