Regional Transit Authority
Of Southeast Michigan

Board of Directors Meeting
Thursday, July 17, 2025
SEMCOG Offices, Woodward Room
1001 Woodward Avenue, Suite 1400
Detroit, MI 48226
Zoom Virtual Public Participation
1:00 PM

AGENDA

1. Call to Order
2. Roll Call
3. **Approval of Agenda**
4. Public Comment – Time Limitation for Public Comment = 3 minutes per speaker
5. Executive Directors Report
6. Presentations
7. Consent Agenda
    a. **Approval of May 2025 Board Meeting Summary**
    b. **Acceptance of Summary of Contracts**
8. Regular Agenda
    a. **Approval of May & June 2025 Financial Reports**
    b. **Approval of Transit App Contract**
    c. **Approval of Updated RTA Drug and Alcohol Policy**
    d. **Approval of QLINE Public Transportation Agency Safety Plan (PTASP)**
    e. **Approval of RTA Express Bus PTASP**
9. New Business
10. Adjourn

The Board may, at its discretion, revise this agenda or take up any other issues as needed, and time allows. Request for reasonable accommodation at RTA meetings requires advanced reservations. Individuals with disabilities requiring assistance should contact RTA Information Services at least 48 hours in advance of the meeting. Documents and information are available in a variety of formats. Contact the RTA at info@rtamichigan.org or call 313-402-1020 to discuss your format needs.

Proposed Meeting Summary
Board of Directors
Thursday, May 15, 2025
1:00 PM

1. **Call to Order at** 1:01 PM**.**

2. **Roll Call:**

Board of Directors members	Government Entity	Attendance Status
Jeannette Bradshaw	Oakland County	P
Freman Hendrix (Secretary)	City of Detroit	P
June Lee	Wayne County	A
Dave Massaron (Chair)	State of Michigan	P
Jon Moore	Macomb County	P
Don Morandini (Vice Chair)	Macomb County	P
Dr. Erica Robertson	Wayne County	A
Alma Wheeler Smith (Treasurer)	Washtenaw County	A
Ned Staebler	Washtenaw County	P
Helaine Zack	Oakland County	P

Absent (A); Present (P); Virtual (V) means participating online, yet unable to vote on official business.

RTA Representatives Present:
Ben Stupka, Rachel Schmuhl, Melanie Piana, Julia Roberts, Corri Wofford, Kristin Caffray, Isaac Constans, Dasia Mack, Kameron Bloye

Other Meeting Participants:
Michelle Hodges – Rehmann
Ryan Bridges - MMA

3. **Approval of Agenda**

- Moved by Vice Chair Morandini and supported by Member Bradshaw. The agenda for May 15, 2025, was approved. The motion carried on the following roll call vote:

Board of Directors members	Government Entity	Vote
Jeannette Bradshaw	Oakland County	Y
Freman Hendrix (Secretary)	City of Detroit	Y
June Lee	Wayne County	A
Dave Massaron (Chair)	State of Michigan	Y
Jon Moore	Macomb County	Y
Don Morandini (Vice Chair)	Macomb County	Y
Dr. Erica Robertson	Wayne County	A
Alma Wheeler Smith (Treasurer)	Washtenaw County	A
Ned Staebler	Washtenaw County	Y
Helaine Zack	Oakland County	Y

- *Absent (A); Yea (Y); Nay (N); Virtual (V) means participating online, yet unable to vote on official business.*

4. Public Comment

Robert Pawlowski – As Vice Chair of the RTA's Citizens Advisory Committee (CAC), Pawlowski requested increasing transparency in knowledge sharing from the Board, primarily in receiving updates on policy and projects. Pawlowski also mentioned that the CAC is planning to conduct "ride-alongs" on RTA services.

5. Executive Directors Report

- Executive Director Stupka presented the following topics:
    - DAX Survey
    - Administration
    - Communications
    - Website
    - Core Business – Planning
    - Initiatives
    - QLINE Performance: Ridership, On-Time, Delays, Safety
    - D2A2 & DAX
    - Strategy & Strategic Plan Schedule

- Secretary Hendrix asked if the lower ridership numbers in January and February are due to weather.
    - Executive Director Stupka answered affirmatively.
- Chair Massaron asked for a more detailed explanation of the metrics on the "QLINE Performance – On Time" slide.

    - Executive Director Stupka explained the bar graphs in more detail, noting the differentiation between “target” and “actual” metrics, along with the on-time performance categories.
- Vice Chair Morandini asked what causes QLINE delays, specifically regarding cars driving on the tracks.
    - Executive Director Stupka answered that people parking/stopping on the tracks is the most consequential for QLINE performance. He also noted that RTA/QLINE is in contact with the Detroit Police Department (DPD) for support.
- Member Bradshaw asked about accidents, specifically if there was an increase in accidents in CY 2025.
    - Executive Director Stupka explained that there had not been an increase in accidents in 2025.
- Secretary Hendrix asked how many buses run over a 24-hour period.
    - Executive Director Stupka answered that 16 round trips run every 24 hours.
- Member Staebler asked about the cost to fund the DAX pilot.
    - Executive Director Stupka answered that it is about $2 million per year.
- Member Zack asked about fare prices for DAX and the park-and-ride.
    - Executive Directors explained the following breakdown of DAX fares:
        - $8 at the door, $6 if you purchase in advance
        - Discounts: $4 for seniors, people with disabilities, students, and youth (ages 2-17)
        - Frequent riders' discounts:
            - Book of 10 passes: $50 ($5 per ride)
            - Book of 50 passes: $100 ($2 per ride)

6. Presentations

- There were no additional presentations.

7. Consent Agenda

a. Approval of March & April 2025 Board Meeting Summaries

b. Acceptance of Procurement Advisory Notice

- Moved by Member Moore and supported by Secretary Hendrix. The consent agenda was approved unanimously. The motion carried on the following roll call vote:

Board of Directors members	Government Entity	Vote
Jeannette Bradshaw	Oakland County	Y
Freman Hendrix (Secretary)	City of Detroit	Y
June Lee	Wayne County	A
Dave Massaron (Chair)	State of Michigan	Y
Jon Moore	Macomb County	Y
Don Morandini (Vice Chair)	Macomb County	Y
Dr. Erica Robertson	Wayne County	A
Alma Wheeler Smith (Treasurer)	Washtenaw County	A
Ned Staebler	Washtenaw County	Y
Helaine Zack	Oakland County	Y

- *Absent (A); Yea (Y); Nay (N); Virtual (V) means participating online, yet unable to vote on official business.*

8. Regular Agenda

a. Approval of March & April 2025 Financial Reports

- Michelle Hodges from Rehmann presented the March & April 2025 Financial Reports.
- Vice Chair Morandini asked a clarifying question about the budget breakdown regarding the calendar and fiscal year discrepancy.
- Vice Chair Morandini also asked if the RTA anticipates continuing to be under budget and if this difference can be carried into the next fiscal year's budget.
    - Michelle Hodges answered affirmatively but noted the local bus operating funding discrepancy.
- Moved by Member Staebler and supported by Secretary Hendrix. The regular agenda was approved. The motion carried on the following roll call vote:

Board of Directors members	Government Entity	Vote
Jeannette Bradshaw	Oakland County	Y
Freman Hendrix (Secretary)	City of Detroit	Y
June Lee	Wayne County	A
Dave Massaron (Chair)	State of Michigan	Y
Jon Moore	Macomb County	Y
Don Morandini (Vice Chair)	Macomb County	Y
Dr. Erica Robertson	Wayne County	A
Alma Wheeler Smith (Treasurer)	Washtenaw County	A
Ned Staebler	Washtenaw County	Y
Helaine Zack	Oakland County	Y

- *Absent (A); Yea (Y); Nay (N); Virtual (V) means participating online, yet unable to vote on official business.*

b. Approval of FY 2025 Federal Formula Funding

- Executive Director Stupka and Planning and Innovation Director, Julia Roberts, presented the FY 2025 Federal Formula Funding overview.

- Member Bradshaw asked if Roberts could explain and clarify how cities within operating regions can receive funding.
    - Planning and Innovation Director Roberts mentioned that the application asked specific questions that may illicit responses as to how the municipalities or community providers are coordinating with the counties and county-wide providers.
- Moved by Member Zack and supported by Member Bradshaw. The FY2025 Federal Formula Funding was approved. The motion carried on the following roll call vote:

Board of Directors members	Government Entity	Vote
Jeannette Bradshaw	Oakland County	Y
Freman Hendrix (Secretary)	City of Detroit	Y
June Lee	Wayne County	A
Dave Massaron (Chair)	State of Michigan	Y
Jon Moore	Macomb County	Y
Don Morandini (Vice Chair)	Macomb County	Y
Dr. Erica Robertson	Wayne County	A
Alma Wheeler Smith (Treasurer)	Washtenaw County	A
Ned Staebler	Washtenaw County	Y
Helaine Zack	Oakland County	Y

- *Absent (A); Yea (Y); Nay (N); Virtual (V) means participating online, yet unable to vote on official business.*

9. New Business

- Secretary Hendrix noted that there is demand for adding a D2A2 stop at Michigan Central/Newlab, asking the RTA to evaluate. More precisely, Hendrix noted that this stop has been requested at the intersection of Michigan Avenue and Rosa Parks Boulevard.

10. Meeting adjourned at 1:51 PM**.**

Regional Transit Authority
Of Southeast Michigan

BOARD OF DIRECTORS MEMORANDUM

TO: RTA Board of Directors

FROM: Melanie Piana, Program Director

SUBJECT: Procurement Advisory Notice

DATE: July 17, 2025

REQUESTED ACTION: Receive and File

Background Information: The RTA procurement policy requires that all procurement types be reported to the Board through an advisory notice at the first available meeting after an award if/when the total value exceeds $50,000.

Since the last Board meeting, the following contract awards have been made:

Method	Description	Vendor	Value
S-RFP	Strategic Planning Services	Bridgeport Consulting	$145,750

Regional Transit Authority of Southeast Michigan

Statement of Net Position and
Governmental Funds Balance Sheet

May 31, 2025

	Governmental Fund	Adjustments	Statement of Net Position	Prior Year (for comparison)
Assets				
Cash and cash equivalents	$ 3,784,039	$ -	$ 3,784,039	$ 96,524
Restricted cash and cash equivalents	66,039	-	66,039	46,244
Accounts receivable	995,639	-	995,639	1,113,120
Prepaids and other assets	112,979	-	112,979	2,110
Capital assets, net of depreciation	-	101,763,625	101,763,625	228,910
Other Assets	-	-	-	-
Total assets	$ 4,958,696	$ 101,763,625	$ 106,722,321	$ 1,486,908
Liabilities				
Accounts payable and other accrued liabilities	1,248,721	-	1,248,721	1,118,262
Accrued payroll and related liabilities	3,902	-	3,902	49,830
Refundable advance	81,361	-	81,361	81,361
Compensated absences	-	77,126	77,126	-
Unearned Revenue	65,555	-	65,555	-
Total liabilities	$ 1,399,539	$ 77,126	$ 1,476,665	$ 1,249,453
Fund balance				
Fund balance	5,575,700	(5,575,700)	-	-
Current year change in fund balance	(2,016,543)	2,016,543	-	-
Total fund balance	$ 3,559,157			
Total liabilities and fund balance	$ 4,958,696			
Net position				
Investment in capital assets		101,763,625	101,763,625	228,910
Unrestricted		9,180,622	9,180,622	122,268
Current year change in net position		(5,698,591)	(5,698,591)	(113,723)
Total net position		$ 105,245,656	$ 105,245,656	$ 237,455

Regional Transit Authority of Southeast Michigan

Statement of Activities and
Governmental Revenues, Expenditures and Changes in Fund Balance

For the 8 Months Ending May 31, 2025

	Governmental Fund	Adjustments	Statement of Activities
Revenue			
Fares	$ 427,052	$ -	$ 427,052
Federal grants	4,534,294	-	4,534,294
State grants - matching	515,306	-	515,306
State grants	3,989,724	-	3,989,724
Local grants	900,000	-	900,000
In-kind revenue	185,394	-	185,394
Project match revenue	-	-	-
RTA regional planning set-aside	-	-	-
Other	80,274	-	80,274
Total revenue	$ 10,632,044	$ -	$ 10,632,044
Expenditures/expenses			
Operating:			
Personnel	3,304,876	11,561	3,316,437
Conferences/events/training	122,710	-	122,710
Board & public meeting management	9,215	-	9,215
Finance, legal, government relations	300,090	-	300,090
Insurance	584,258	-	584,258
Rent and utilities	323,760	-	323,760
Telephone and internet	13,421	-	13,421
Computer equipment and IT support	134,118	-	134,118
Services	4,359,984	-	4,359,984
Supplies	1,991,254	-	1,991,254
Total operating	11,143,686	11,561	11,155,247
Planning:			
Planning services	1,055,760	-	1,055,760
Specialized planning services	-	-	-
CHSTP	244,598	-	244,598
Community engagement	-	-	-
Total planning	1,300,358	-	1,300,358
External affairs:			
Branding	10,000	-	10,000
External communications	163,172	-	163,172
Social media management	-	-	-
Website	21,820	-	21,820
Graphics/photography	6,340	-	6,340
Promotional items	-	-	-
Miscellaneous items	3,211	-	3,211
Total external affairs	204,543	-	204,543
Other -			
Depreciation/amortization	-	3,670,487	3,670,487
Total expenditures/expenses	$ 12,648,587	$ 3,682,048	$ 16,330,635
Change in fund balance/net position	$ (2,016,543)	$ (3,682,048)	$ (5,698,591)

Regional Transit Authority of Southeast Michigan

Statement of Revenues, Expenditures and Changes in Fund Balance - Budget to Actual

For the 8 Months Ending May 31, 2025

	General Admin		Qline		D2A2	
	Actual	**Budget**	**Actual**	**Budget**	**Actual**	**Budget**
Revenue						
Fares	$ -	$ -	$ -	$ -	$ 244,368	$ 224,320
Federal grants	2,049,922	1,812,311	-	733,333	1,263,319	1,140,493
State grants - matching	-	-	-	183,333	233,458	74,040
State grants	445,859	763,825	3,248,707	1,965,744	128,759	337,014
Local grants	-	-	900,000	3,933,333	-	-
In-kind revenue	-	-	-	-	105,497	93,467
Project match revenue	-	-	-	-	-	-
RTA regional planning set-aside	-	-	-	-	-	-
Other	30,497	-	49,778	-	-	-
Total revenue	$ 2,526,278	$ 2,576,136	$ 4,198,485	$ 6,815,744	$ 1,975,401	$ 1,869,333
Expenditures						
Operating:						
Personnel	892,799	1,276,677	2,412,076	2,738,000	-	-
Conferences/events/training	75,922	75,085	46,784	-	-	-
Board & public meeting management	6,404	10,400	2,810	-	-	-
Finance, legal, government relations	270,486	216,037	29,608	312,143	-	-
Insurance	11,437	11,180	572,824	842,667	-	-
Rent and utilities	6,257	85,200	317,508	319,333	-	-
Telephone and internet	13,422	5,620	-	-	-	-
Computer equipment and IT support	74,364	71,343	57,975	-	1,717	-
Services	3,396	-	711,093	86,000	1,973,684	1,869,333
Supplies	2,200	1,667	1,989,039	2,656,667	-	-
Total operating	1,356,687	1,753,209	6,139,717	6,954,809	1,975,401	1,869,333
Planning:						
Planning services	665,659	375,027	130,102	-	-	-
Specialized planning services	-	83,333	-	-	-	-
CHSTP	244,598	100,000	-	-	-	-
Community engagement	-	133,333	-	-	-	-
Total planning	910,257	691,693	130,102	-	-	-
External affairs:						
Branding	10,000	6,667	-	-	-	-
External communications	96,000	83,333	67,172	105,333	-	-
Social media management	-	5,200	-	-	-	-
Website	18,125	23,333	3,695	-	-	-
Graphics/photography	265	6,767	6,075	-	-	-
Promotional items	-	5,933	-	-	-	-
Miscellaneous items	1,706	-	1,505	-	-	-
Total external affairs	126,096	131,233	78,447	105,333	-	-
Total expenditures	$ 2,393,040	$ 2,576,136	$ 6,348,266	$ 7,060,143	$ 1,975,401	$ 1,869,333
Change in fund balance	$ 133,238	$ -	$ (2,149,781)	$ (244,399)	$ -	$ -

Regional Transit Authority of Southeast Michigan

Statement of Revenues, Expenditures and Changes in Fund Balance - Budget to Actual

For the 8 Months Ending May 31, 2025

	DAX		One Click/One Call		Mobility Wallet	
	Actual	**Budget**	**Actual**	**Budget**	**Actual**	**Budget**
Revenue						
Fares	$ 182,684	$ 181,333	$ -	$ -	$ -	$ -
Federal grants	960,548	605,437	166,843	266,667	-	-
State grants - matching	240,138	106,667	41,712	66,667	-	-
State grants	-	119,897	-	-	142,982	400,000
Local grants	-	-	-	-	-	-
In-kind revenue	79,895	53,333	-	-	-	-
Project match revenue	-	-	-	-	-	-
RTA regional planning set-aside	-	-	-	-	-	-
Other	-	-	-	-	-	-
Total revenue	$ 1,463,265	$ 1,066,667	$ 208,555	$ 333,333	$ 142,982	$ 400,000
Expenditures						
Operating:						
Personnel	-		-	-	-	
Conferences/events/training	-		-	-	-	
Board & public meeting management	-		-	-	-	
Finance, legal, government relations	-		-	-	-	
Insurance	-		-	-	-	
Rent and utilities	-		-	-	-	
Telephone and internet	-		-	-	-	
Computer equipment and IT support	-		-	-	64	
Services	1,463,265	1,066,667	208,555	333,333	-	400,000
Supplies	-		-		-	
Total operating	1,463,265	1,066,667	208,555	333,333	64	400,000
Planning:						
Planning services	-	-	-	-	142,918	-
Specialized planning services	-	-	-	-	-	-
CHSTP	-	-	-	-	-	-
Community engagement	-	-	-	-	-	-
Total planning	-	-	-	-	142,918	-
External affairs:						
Branding	-	-	-	-	-	-
External communications	-	-	-	-	-	-
Social media management	-	-	-	-	-	-
Website	-	-	-	-	-	-
Graphics/photography	-	-	-	-	-	-
Promotional items	-	-	-	-	-	-
Miscellaneous items	-	-	-	-	-	-
Total external affairs	-	-	-	-	-	-
Total expenditures	$ 1,463,265	$ 1,066,667	$ 208,555	$ 333,333	$ 142,982	$ 400,000
Change in fund balance	$ -	$ -	$ -	$ -	$ -	$ -

continued…

Regional Transit Authority of Southeast Michigan

Statement of Revenues, Expenditures and Changes in Fund Balance - Budget to Actual

For the 8 Months Ending May 31, 2025

	Access to Transit		Total Year to Date		Annual
	Actual	Budget	Actual	Budget	Budget
Revenue					
Fares	$ -	$ 1,066,667	$ 427,052	$ 1,472,320	$ 608,480
Federal grants	93,665		4,534,297	4,558,240	8,437,361
State grants - matching	-	266,667	515,308	697,373	1,046,060
State grants	23,417	908,930	3,989,724	4,495,410	6,743,114
Local grants	-		900,000	3,933,333	5,900,000
In-kind revenue	-		185,392	146,800	220,200
Project match revenue	-		-	-	-
RTA regional planning set-aside	-		-	-	-
Other	-		80,275	-	-
Total revenue	$ 117,082	$ 2,242,263	$ 10,632,046	$ 15,303,477	$ 22,955,215
Expenditures					
Operating:					
Personnel	-	-	3,304,875	4,014,677	6,022,016
Conferences/events/training	-	-	122,706	75,085	112,628
Board & public meeting management	-	-	9,214	10,400	15,600
Finance, legal, government relations	-	-	300,094	528,179	792,269
Insurance	-	-	584,261	853,847	1,280,770
Rent and utilities	-	-	323,765	404,533	606,800
Telephone and internet	-	-	13,422	5,620	8,430
Computer equipment and IT support	-	-	134,120	71,343	107,015
Services	-	2,242,263	4,359,993	5,997,597	8,996,395
Supplies	-	-	1,991,239	2,658,333	3,987,500
Total operating	-	2,242,263	11,143,689	14,619,615	21,929,423
Planning:					
Planning services	117,082	-	1,055,761	375,027	562,540
Specialized planning services	-	-	-	83,333	125,000
CHSTP	-	-	244,598	100,000	150,000
Community engagement	-	-	-	133,333	200,000
Total planning	117,082	-	1,300,359	691,693	1,037,540
External affairs:					
Branding	-	-	10,000	6,667	10,000
External communications	-	-	163,172	188,667	283,000
Social media management	-	-	-	5,200	7,800
Website	-	-	21,820	23,333	35,000
Graphics/photography	-	-	6,340	6,767	10,150
Promotional items	-	-	-	5,933	3,400
Miscellaneous items	-	-	3,211	-	5,500
Total external affairs	-	-	204,543	236,567	354,850
Total expenditures	$ 117,082	$ 2,242,263	$ 12,648,591	$ 15,547,875	$ 23,321,813
Change in fund balance	$ -	$ -	$ (2,016,543)	$ (244,399)	$ (366,598)

concluded.

Project Budget Tracker

Title	**Detroit to Ann Arbor Express Bus (D2A2)**
Description	Express bus connecting downtown Detroit to downtown Ann Arbor.
Schedule	October 2021 - September 2025

Budget Tracker			
	Total	ITD	Balance
Cost	**$ 10,607,529**	**$ 9,916,697**	**$690,832**
Grants			
MI-2021-036-01	$4,311,592	$4,311,592	($0)
2017-0119/P7/R2	$1,635,893	$1,635,893	$0
Fares/Contrib	$955,214	$1,535,156	($579,942)
MI-2021-036-02	$1,373,593	$1,373,593	($0)
MDOT LBO	$505,521	$128,759	$376,762
ARPA MI-2022-005-02	$1,825,716	$931,703	$894,013
	$10,607,529	$9,916,697	$690,832

Title	**Regional Mobility Management (MyRide2)**
Description	Call center/website with information for seniors and persons with disabilities.
Schedule	October 2017 - September 2026

Budget Tracker			
	Total	ITD	Balance
Cost	**$1,850,920**	**$1,804,409**	**$46,511**
Grants			
MI-2017-031-02	$1,069,444	$1,069,444	$0
2017-0119/P2/R4	$267,361	$267,361	$0
MI-2024-009-01	$411,292	$374,083	$37,209
2022-0126/P7	$102,823	$93,521	$9,302
	$1,850,920	$1,804,409	$46,511

Title	**Universal Basic Mobility Pilot**
Description	Mobility wallet fare technology pilot focused on Detroit jobseekers.
Schedule	June 2023 - July 2026

Budget Tracker			
	Cost	ITD	Balance
Cost	**$1,025,000**	**$579,644**	**$445,356**
Grants			
2022-0126-P3	$1,025,000	$579,644	$445,356
	$1,025,000	$579,644	$445,356

Title	**Downtown to Airport Express**
Description	Express bus connecting downtown Metro Airport to Downtown Detroit.
Schedule	March 2024 - September 2025

Budget Tracker			
	Cost	ITD	Balance
Cost	**$3,467,087**	**$2,732,160**	**$734,927**
Grants			
MI-2024-002	$2,000,000	$1,796,944	$203,056
2022-0126-P4 R1	$500,000	$449,236	$50,764
Fares/Contrib	$519,087	$485,981	$33,106
MDOT LBO	$179,845	$0	$179,845
ARPA MI-2022-005-02	$268,155	$0	$268,155
	$3,467,087	$2,732,160	$734,927

Title	**Regional Technology Strategic Plan**
Description	Inventory and assessment of providers technology and identifcation of goals.
Schedule	October 2024 - June 2025

Budget Tracker			
	Cost	ITD	Balance
Cost	**$125,000**	**$117,351**	**$7,649**
Grants			
2017-0119/P10	$125,000	$117,351	$7,649

Title	**Access to Transit Program**
Description	Grant program for safety and access improvements at bus stops.
Schedule	October 2024 - December 2026

Budget Tracker			
	Cost	ITD	Balance
Cost	**$3,363,395**	**$117,082**	**$3,246,314**
Grants			
2022-0126-P6	$1,363,395	$117,082	$1,246,314
FY2024 CMAQ*	$1,600,000	$0	$1,600,000
State Grant*	$400,000	$0	$400,000
	$3,363,395	$117,082	$3,246,314

*Funding is secured. Will be amended into the grant at a future date.

Regional Transit Authority of Southeast Michigan

Statement of Net Position and
Governmental Funds Balance Sheet

June 30, 2025

	Governmental Fund	Adjustments	Statement of Net Position	Prior Year (for comparison)
Assets				
Cash and cash equivalents	$ 3,347,039	$ -	$ 3,347,039	$ 69,866
Restricted cash and cash equivalents	66,087	-	66,087	46,282
Accounts receivable	902,843	-	902,843	517,060
Prepaids and other assets	79,265	-	79,265	540
Capital assets, net of depreciation	-	101,304,814	101,304,814	214,603
Other Assets	-	-	-	-
Total assets	$ 4,395,234	$ 101,304,814	$ 105,700,048	$ 848,351
Liabilities				
Accounts payable and other accrued liabilities	1,412,036	-	1,412,036	491,001
Accrued payroll and related liabilities	5,041	-	5,041	52,677
Refundable advance	81,361	-	81,361	81,361
Compensated absences	-	77,126	77,126	-
Unearned Revenue	122,865	-	122,865	-
Total liabilities	$ 1,621,303	$ 77,126	$ 1,698,429	$ 625,040
Fund balance				
Fund balance	5,575,701	(5,575,701)	-	-
Current year change in fund balance	(2,801,770)	2,801,770	-	-
Total fund balance	$ 2,773,931			
Total liabilities and fund balance	$ 4,395,234			
Net position				
Investment in capital assets		101,304,814	101,304,814	214,603
Unrestricted		9,639,433	9,639,433	136,574
Current year change in net position		(6,942,628)	(6,942,628)	(127,866)
Total net position		$ 104,001,619	$ 104,001,619	$ 223,311

Regional Transit Authority of Southeast Michigan

Statement of Activities and
Governmental Revenues, Expenditures and Changes in Fund Balance

For the 9 Months Ending June 30, 2025

	Governmental Fund	Adjustments	Statement of Activities
Revenue			
Fares	$ 486,426	$ -	$ 486,426
Federal grants	4,625,099	-	4,625,099
State grants - matching	549,115	-	549,115
State grants	4,545,692	-	4,545,692
Local grants	900,000	-	900,000
In-kind revenue	209,395	-	209,395
Project match revenue	-	-	-
RTA regional planning set-aside	-	-	-
Other	89,050	-	89,050
Total revenue	$ 11,404,777	$ -	$ 11,404,777
Expenditures/expenses			
Operating:			
Personnel	3,707,643	11,561	3,719,204
Conferences/events/training	128,591	-	128,591
Board & public meeting management	24,197	-	24,197
Finance, legal, government relations	338,745	-	338,745
Insurance	657,168	-	657,168
Rent and utilities	347,505	-	347,505
Telephone and internet	14,719	-	14,719
Computer equipment and IT support	155,927	-	155,927
Services	4,906,114	-	4,906,114
Supplies	2,092,886	-	2,092,886
Total operating	12,373,495	11,561	12,385,056
Planning:			
Planning services	1,354,132	-	1,354,132
Specialized planning services	-	-	-
CHSTP	254,312	-	254,312
Community engagement	-	-	-
Total planning	1,608,444	-	1,608,444
External affairs:			
Branding	10,000	-	10,000
External communications	183,212	-	183,212
Social media management	-	-	-
Website	21,845	-	21,845
Graphics/photography	6,340	-	6,340
Promotional items	-	-	-
Miscellaneous items	3,211	-	3,211
Total external affairs	224,608	-	224,608
Other -			
Depreciation/amortization	-	4,129,297	4,129,297
Total expenditures/expenses	$ 14,206,547	$ 4,140,858	$ 18,347,405
Change in fund balance/net position	$ (2,801,770)	$ (4,140,858)	$ (6,942,628)

Regional Transit Authority of Southeast Michigan

Statement of Revenues, Expenditures and Changes in Fund Balance - Budget to Actual

For the 9 Months Ending June 30, 2025

	General Admin		Qline		D2A2	
	Actual	**Budget**	**Actual**	**Budget**	**Actual**	**Budget**
Revenue						
Fares	$ -	$ -	$ -	$ -	$ 277,106	$ 252,360
Federal grants	1,848,858	2,038,850	-	825,000	1,418,472	1,283,054
State grants - matching	-	-	-	206,250	233,458	83,295
State grants	821,423	859,303	3,282,723	2,211,462	192,599	379,141
Local grants	-	-	900,000	4,425,000	-	-
In-kind revenue	-	-	-	-	119,631	105,150
Project match revenue	-	-	-	-	-	-
RTA regional planning set-aside	-	-	-	-	-	-
Other	41,843	-	47,208	-	-	-
Total revenue	$ 2,712,124	$ 2,898,153	$ 4,229,931	$ 7,667,712	$ 2,241,266	$ 2,103,000
Expenditures						
Operating:						
Personnel	995,238	1,436,262	2,712,402	3,080,250	-	-
Conferences/events/training	81,496	84,471	47,092	-	-	-
Board & public meeting management	20,809	11,700	3,387	-	-	-
Finance, legal, government relations	307,760	243,041	30,989	351,161	-	-
Insurance	12,708	12,578	644,463	948,000	-	-
Rent and utilities	9,972	95,850	337,538	359,250	-	-
Telephone and internet	14,719	6,323	-	-	-	-
Computer equipment and IT support	92,954	80,261	60,917	-	1,994	-
Services	3,396	-	786,084	96,750	2,239,272	2,103,000
Supplies	2,512	1,875	2,090,363	2,988,750	-	-
Total operating	1,541,564	1,972,361	6,713,235	7,824,161	2,241,266	2,103,000
Planning:						
Planning services	860,182	421,905	149,925	-	-	-
Specialized planning services	-	93,750	-	-	-	-
CHSTP	254,311	112,500	-	-	-	-
Community engagement	-	150,000	-	-	-	-
Total planning	1,114,493	778,155	149,925	-	-	-
External affairs:						
Branding	10,000	7,500	-	-	-	-
External communications	108,800	93,750	74,412	118,500	-	-
Social media management	-	5,850	-	-	-	-
Website	18,150	26,250	3,695	-	-	-
Graphics/photography	265	7,613	6,075	-	-	-
Promotional items	-	6,675	-	-	-	-
Miscellaneous items	1,706	-	1,505	-	-	-
Total external affairs	138,921	147,638	85,687	118,500	-	-
Total expenditures	$ 2,794,978	$ 2,898,153	$ 6,948,847	$ 7,942,661	$ 2,241,266	$ 2,103,000
Change in fund balance	$ (82,854)	$ -	$ (2,718,916)	$ (274,949)	$ -	$ -

Regional Transit Authority of Southeast Michigan

Statement of Revenues, Expenditures and Changes in Fund Balance - Budget to Actual

For the 9 Months Ending June 30, 2025

	DAX		One Click/One Call		Mobility Wallet	
	Actual	**Budget**	**Actual**	**Budget**	**Actual**	**Budget**
Revenue						
Fares	$ 209,320	$ 204,000	$ -	$ -	$ -	$ -
Federal grants	1,095,786	681,116	166,843	300,000	-	-
State grants - matching	273,947	120,000	41,712	75,000	-	-
State grants	-	134,884	-	-	225,160	450,000
Local grants	-	-	-	-	-	-
In-kind revenue	89,763	60,000	-	-	-	-
Project match revenue	-	-	-	-	-	-
RTA regional planning set-aside	-	-	-	-	-	-
Other	-	-	-	-	-	-
Total revenue	$ 1,668,816	$ 1,200,000	$ 208,555	$ 375,000	$ 225,160	$ 450,000
Expenditures						
Operating:						
Personnel	-		-	-	-	
Conferences/events/training	-		-	-	-	
Board & public meeting management	-		-	-	-	
Finance, legal, government relations	-		-	-	-	
Insurance	-		-	-	-	
Rent and utilities	-		-	-	-	
Telephone and internet	-		-	-	-	
Computer equipment and IT support	-		-	-	64	
Services	1,668,816	1,200,000	208,555	375,000	-	450,000
Supplies	-		-		-	
Total operating	1,668,816	1,200,000	208,555	375,000	64	450,000
Planning:						
Planning services	-	-	-	-	225,096	-
Specialized planning services	-	-	-	-	-	-
CHSTP	-	-	-	-	-	-
Community engagement	-	-	-	-	-	-
Total planning	-	-	-	-	225,096	-
External affairs:						
Branding	-	-	-	-	-	-
External communications	-	-	-	-	-	-
Social media management	-	-	-	-	-	-
Website	-	-	-	-	-	-
Graphics/photography	-	-	-	-	-	-
Promotional items	-	-	-	-	-	-
Miscellaneous items	-	-	-	-	-	-
Total external affairs	-	-	-	-	-	-
Total expenditures	$ 1,668,816	$ 1,200,000	$ 208,555	$ 375,000	$ 225,160	$ 450,000
Change in fund balance	$ -	$ -	$ -	$ -	$ -	$ -

continued…

Regional Transit Authority of Southeast Michigan

Statement of Revenues, Expenditures and Changes in Fund Balance - Budget to Actual

For the 9 Months Ending June 30, 2025

	Access to Transit		Total Year to Date		Annual
	Actual	Budget	Actual	Budget	Budget
Revenue					
Fares	$ -	$ 1,200,000	$ 486,426	$ 1,656,360	$ 608,480
Federal grants	95,145		4,625,104	5,128,021	8,437,361
State grants - matching	-	300,000	549,117	784,545	1,046,060
State grants	23,787	1,022,546	4,545,692	5,057,336	6,743,114
Local grants	-		900,000	4,425,000	5,900,000
In-kind revenue	-		209,394	165,150	220,200
Project match revenue	-		-	-	-
RTA regional planning set-aside	-		-	-	-
Other	-		89,051	-	-
Total revenue	$ 118,932	$ 2,522,546	$ 11,404,782	$ 17,216,411	$ 22,955,215
Expenditures					
Operating:					
Personnel	-	-	3,707,640	4,516,512	6,022,016
Conferences/events/training	-	-	128,588	84,471	112,628
Board & public meeting management	-	-	24,196	11,700	15,600
Finance, legal, government relations	-	-	338,749	594,202	792,269
Insurance	-	-	657,171	960,578	1,280,770
Rent and utilities	-	-	347,510	455,100	606,800
Telephone and internet	-	-	14,719	6,323	8,430
Computer equipment and IT support	-	-	155,929	80,261	107,015
Services	-	2,522,546	4,906,123	6,747,296	8,996,395
Supplies	-	-	2,092,875	2,990,625	3,987,500
Total operating	-	2,522,546	12,373,500	16,447,067	21,929,423
Planning:					
Planning services	118,932	-	1,354,135	421,905	562,540
Specialized planning services	-	-	-	93,750	125,000
CHSTP	-	-	254,311	112,500	150,000
Community engagement	-	-	-	150,000	200,000
Total planning	118,932	-	1,608,446	778,155	1,037,540
External affairs:					
Branding	-	-	10,000	7,500	10,000
External communications	-	-	183,212	212,250	283,000
Social media management	-	-	-	5,850	7,800
Website	-	-	21,845	26,250	35,000
Graphics/photography	-	-	6,340	7,613	10,150
Promotional items	-	-	-	6,675	3,400
Miscellaneous items	-	-	3,211	-	5,500
Total external affairs	-	-	224,608	266,138	354,850
Total expenditures	$ 118,932	$ 2,522,546	$ 14,206,554	$ 17,491,360	$ 23,321,813
Change in fund balance	$ -	$ -	$ (2,801,770)	$ (274,949)	$ (366,598)

concluded.

Project Budget Tracker

Title **Detroit to Ann Arbor Express Bus (D2A2)**
Description Express bus connecting downtown Detroit to downtown Ann Arbor.
Schedule October 2021 - September 2025

Budget Tracker			
	Total	ITD	Balance
Cost	**$ 10,607,529**	**$ 10,182,561**	**$424,968**
Grants			
MI-2021-036-01	$4,311,592	$4,311,592	($0)
2017-0119/P7/R2	$1,635,893	$1,635,893	$0
Fares/Contrib	$955,214	$1,582,028	($626,814)
MI-2021-036-02	$1,373,593	$1,373,593	($0)
MDOT LBO	$505,521	$192,599	$312,922
ARPA MI-2022-005-02	$1,825,716	$1,086,856	$738,860
	$10,607,529	$10,182,561	$424,968

Title **Regional Mobility Management (MyRide2)**

Description Call center/website with information for seniors and persons with disabilities.
Schedule October 2017 - September 2026

Budget Tracker			
	Total	ITD	Balance
Cost	**$1,850,920**	**$1,804,409**	**$46,511**
Grants			
MI-2017-031-02	$1,069,444	$1,069,444	$0
2017-0119/P2/R4	$267,361	$267,361	$0
MI-2024-009-01	$411,292	$374,083	$37,209
2022-0126/P7	$102,823	$93,521	$9,302
	$1,850,920	$1,804,409	$46,511

Note: FY2025 Q3 invoice not yet received

Title **Universal Basic Mobility Pilot**
Description Mobility wallet fare technology pilot focused on Detroit jobseekers.
Schedule June 2023 - July 2026

Budget Tracker			
	Cost	ITD	Balance
Cost	**$1,025,000**	**$661,822**	**$363,178**
Grants			
2022-0126-P3	$1,025,000	$661,822	$363,178
	$1,025,000	$661,822	$363,178

Title	**Downtown to Airport Express**
Description	Express bus connecting downtown Metro Airport to Downtown Detroit.
Schedule	March 2024 - September 2025

Budget Tracker			
	Cost	ITD	Balance
Cost	**$3,467,087**	**$2,937,711**	**$529,376**
Grants			
MI-2024-002	$2,000,000	$1,932,182	$67,818
2022-0126-P4 R1	$500,000	$483,045	$16,955
Fares/Contrib	$519,087	$522,484	($3,397)
MDOT LBO	$179,845	$0	$179,845
ARPA MI-2022-005-02	$268,155	$0	$268,155
	$3,467,087	$2,937,711	$529,376

Title	**Regional Technology Strategic Plan**
Description	Inventory and assessment of providers technology and identifcation of goals.
Schedule	October 2024 - June 2025

Budget Tracker			
	Cost	ITD	Balance
Cost	**$125,000**	**$117,351**	**$7,649**
Grants			
2017-0119/P10	$125,000	$117,351	$7,649

Title	**Access to Transit Program**
Description	Grant program for safety and access improvements at bus stops.
Schedule	October 2024 - December 2026

Budget Tracker			
	Cost	ITD	Balance
Cost	**$3,363,395**	**$118,932**	**$3,244,464**
Grants			
2022-0126-P6	$1,363,395	$118,932	$1,244,464
FY2024 CMAQ*	$1,600,000	$0	$1,600,000
State Grant*	$400,000	$0	$400,000
	$3,363,395	$118,932	$3,244,464

*Funding is secured. Will be amended into the grant at a future date.

Regional Transit Authority Of Southeast Michigan

BOARD OF DIRECTORS MEMORANDUM

TO:	RTA Board of Directors
FROM:	Ben Stupka, Executive Director
SUBJECT:	Transit App Pilot Program
DATE:	July 17, 2025
REQUESTED ACTION:	Board of Directors Approval

Approval Request:

This memo requests board approval for the Executive Director to accept the Transit App proposal and to enter into a contract with Transit App to execute a three-year pilot project funded by a grant through the Michigan Department of Transportation (MDOT).

Background:

Transit is an international technology company that provides a mobile app for public transportation riders. The app offers real-time transit information, trip planning, fare payment integration, and rider feedback tools. A simplified version of the app is available for free, but an upgraded version with integration is available for subscribers or agencies that want to provide it to their riders. The latter partnership is in place with hundreds of agencies across North America. The RTA, in partnership with DDOT, MoGo, PeopleMover, SMART, and TheRide, has secured funding from the Michigan Department of Transportation (MDOT) to extend the upgraded version to transit users throughout the region.

The purpose of this memorandum is to provide information on the proposed app and the pilot project. RTA staff are seeking Board approval to enter into the contract needed for this upgrade.

Transit App Pilot Program:

The proposed three-year contract with Transit App provides all the partners with two core service bundles—Guide and Inform—that will significantly enhance the digital transit experience for riders across the region. This pilot will focus on fixed route systems, and the SMART and TheRide Flex on-demand systems. We will work throughout the pilot period to see if there is a pathway to branch this over to paratransit and dial-a-ride systems.

Attachment B1: Transit App Proposal must be approved by the Board of Directors.

Guide Package

- Royale for Agencies, which gives all riders free, premium access to the Transit app with RTA branding, unlocking advanced trip planning features and removing paywalls.
- Fare payment integration, allowing seamless connections to mobile ticketing and contactless payment systems.
- On-demand integration, enabling users to view and book flexible services directly within the app.
- Transit APIs, which allow the providers to embed real-time trip planning and mobility data into websites, kiosks, and other digital platforms.

Inform Package

- Communicate directly with riders through in-app banners and push notifications, targeted by location, language, and rider behavior.
- Use Network Change Previews to visually demonstrate how upcoming service changes will affect individual trips, reduce confusion, and improve public engagement.

The program will include joint marketing and Menlo Innovation's evaluation with all of the providers. Additionally, service branding will be retained by the providers so that app users will be able to associate the improved trip planning with their core provider.

Program Schedule

The standard implementation timeline is four to six weeks after contract completion. RTA staff anticipates launching this pilot in the fall of 2025 and ending it in fall 2028.

Program Cost and Funding

The three-year pilot program has an estimated cost of $910,000. The bulk of that will be supported by a $828,000 MDOT Service Initiatives grant. The remainder will be administrative and project management with in-kind support from RTA staff. On top of the Transit App, the pilot program also includes marketing, evaluation, and funding for integration of existing mobile ticketing and on-demand systems.

Program Benefits

The key benefits of the pilot are:

- Improved rider satisfaction through real-time, accurate, and accessible trip information.
- Stronger regional branding and visibility via customized app interfaces.
- Increased fare system adoption through integrated mobile ticketing and payment tools.
- Enhanced communication with riders during service disruptions or planned changes.
- Data-driven insights from rider behavior and feedback to inform planning and operations.
- Reduced customer service burden by proactively addressing rider needs through the app.

Additionally, there may be an opportunity to test the RTA's Mobility Wallet pilot integration into this app to get us a step closer to fully integrated real-time tracking, trip-planning, and payment platform.

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H2T 13X Canada

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transitapp.com

Transit app for the RTA - Detroit

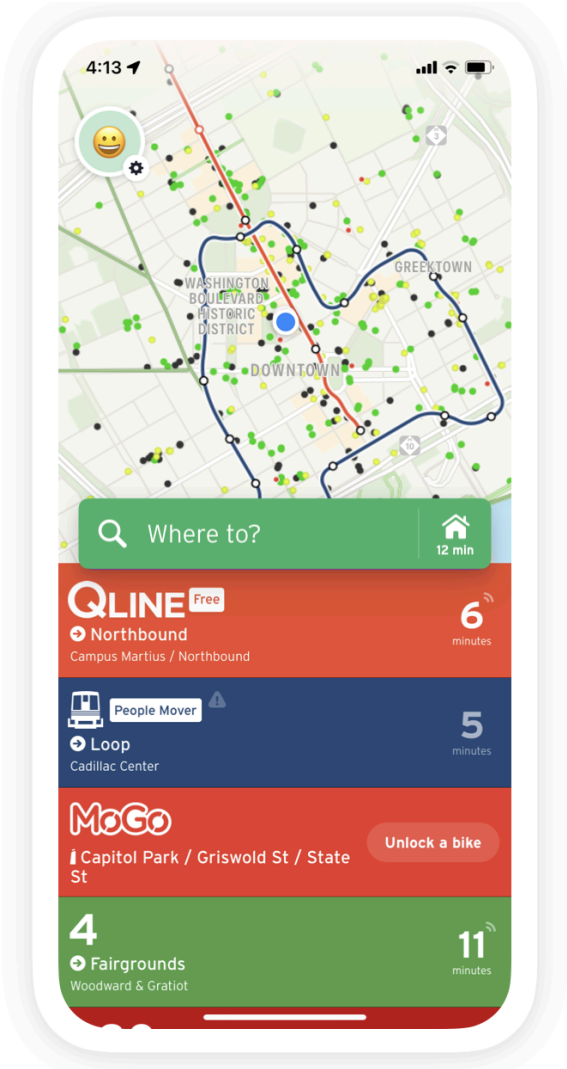
April 16, 2025

Submitted by Transit to the Regional Transit Authority of Southeast Michigan

Table of Contents

Intro: Guide, Inform, Listen

At *Transit*, it all begins with an app that makes life better for you and your riders.



We take pride in designing an app that millions rely on, with an intuitive design that makes it easy and enjoyable to ride public transit.

Our app is *the* tool riders turn to every day. We're there with real-time updates when they need to know when the bus is going to show up, a companion to show the way when they don't already know it by heart, a beacon to tell them if there's a wrench in their commute, a guide to route them around the unexpected.

We're also a megaphone to help them share feedback about their daily commute, and a platform to connect both with other riders and their transit agency

Our unrelenting focus on the needs of transit riders makes us better than any navigation app. After all, your riders deserve a complete digital experience that puts their needs first.

We've launched more than 180 partnerships with transit agencies, each one a direct collaboration with the shared goal of a better experience for public transit riders. We do this in three major ways, by helping your team:

1) Guide riders through their journeys with reliable, accurate, easy-to-understand information

2) Inform riders of network changes, service updates, and other strategic communications

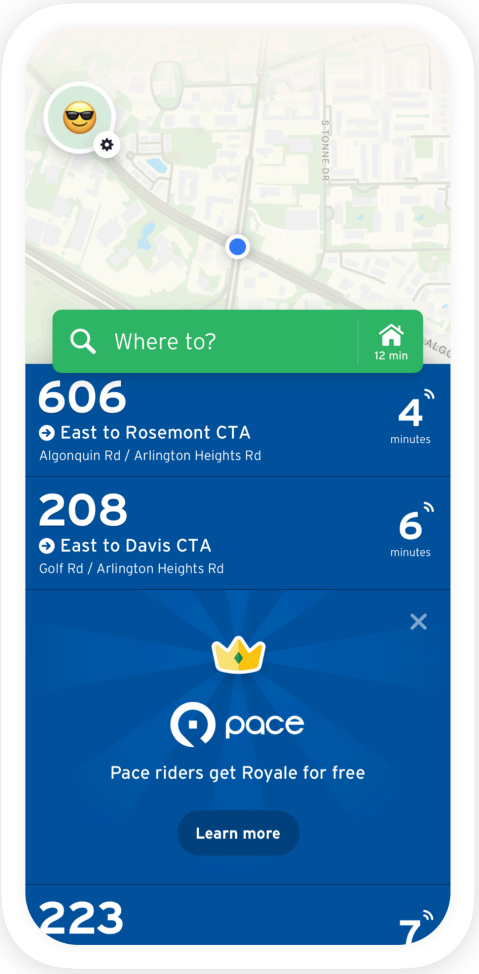
3) Listen to riders through customer feedback that's representative, ongoing and actionable

Guide, Inform, Listen: for a better transit system and happier riders.

1. **Guide** your riders through their journeys

Royale for Agencies

Royale is Transit's subscription service, offering a premium in-app experience: with unlimited access to nearby transit lines, additional trip planner search results, customizable app icons, and more.



Access to Royale's features, including the removal of the in-app paywall, can be purchased either by individuals (for themselves) or by their transit agency.

Royale for Agencies offers instant, paywall-free access to Transit for all riders and visitors. Agencies that subscribe to Royale receive custom in-app branding, putting your logo and service colours on the home screens of your riders' mobile devices.

By upgrading to Royale and giving riders complete access to all routes, more trip suggestions, and later departure times, Royale for Agencies helps to build a larger audience for your agency, combining our technological know-how with your brand recognition to create a powerful platform for riders.

Partner agencies benefit from our in-house resources, from real-time data monitoring to instant feedback from riders using the app. Our team of transit technology experts is here to support your staff, and find common best practices among the hundreds of peer agencies that work with Transit. These benefits include quarterly transit data reviews, automatic email alerts when we detect real-time data issues, and beta-feed access for internal agency testing of new data sources.

What's included in the Royale for Agencies service:

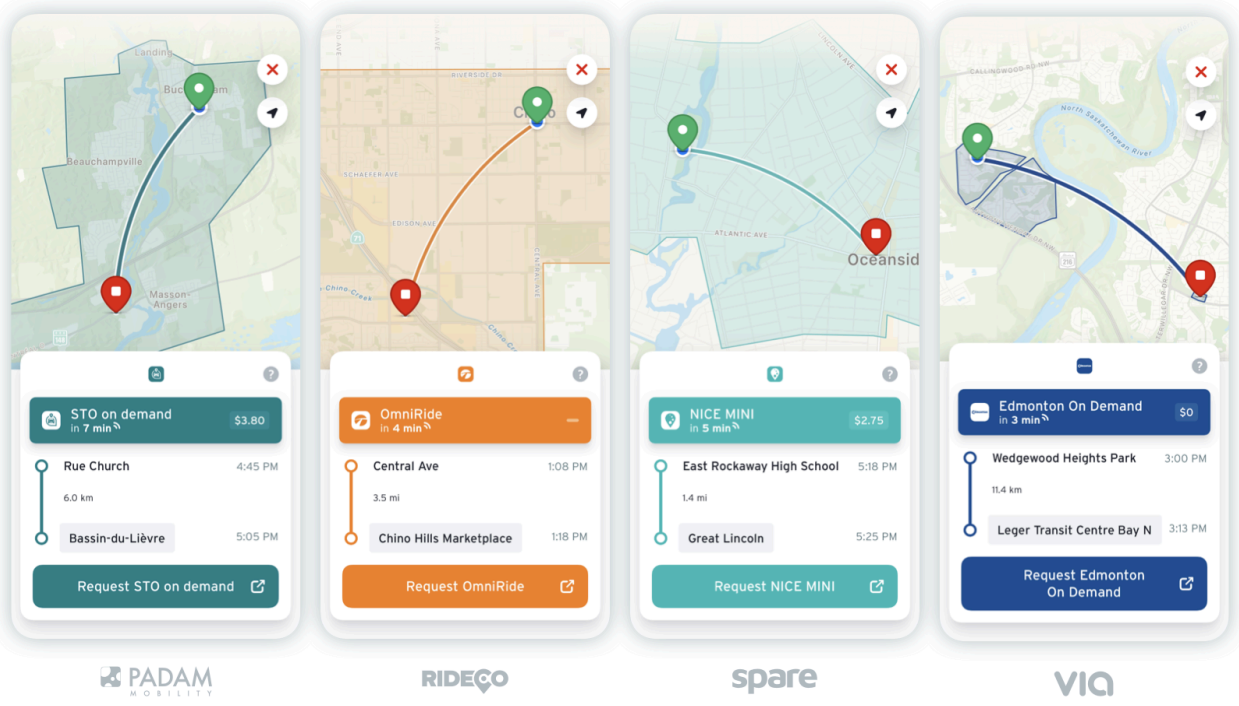
- Paywall-free experience for your riders with your branding and in-app visual elements
- Regular meetings with Transit's Service Delivery Team, including GTFS and realtime experts and automated email alerts when your real-time feed goes down
- Beta versions for testing new feeds and integrations and early access to new Transit app features
- Quarterly transit data reviews
- Automatic email alerts when real-time goes down

On-Demand Integration

Transit helps riders connect on-demand and paratransit services to fixed-route, view zones on the map, and link directly to the booking platform – all in the app they use every day.

Thanks to our public On Demand API Guidelines, Transit can integrate any on-demand software provider. Transit currently has 45+ live integrations with Spare, RideCo, Padam, Via, Pantonium, Ecolane, Trapeze, and DemandTrans. When integrated, on-demand options appear on the app's **Main Screen** and **Trip Planning** interfaces.

Transit integrates paratransit and call-ahead services via GTFS-flex, which defines service zones, hours of operation, and includes a website link or phone number for booking.



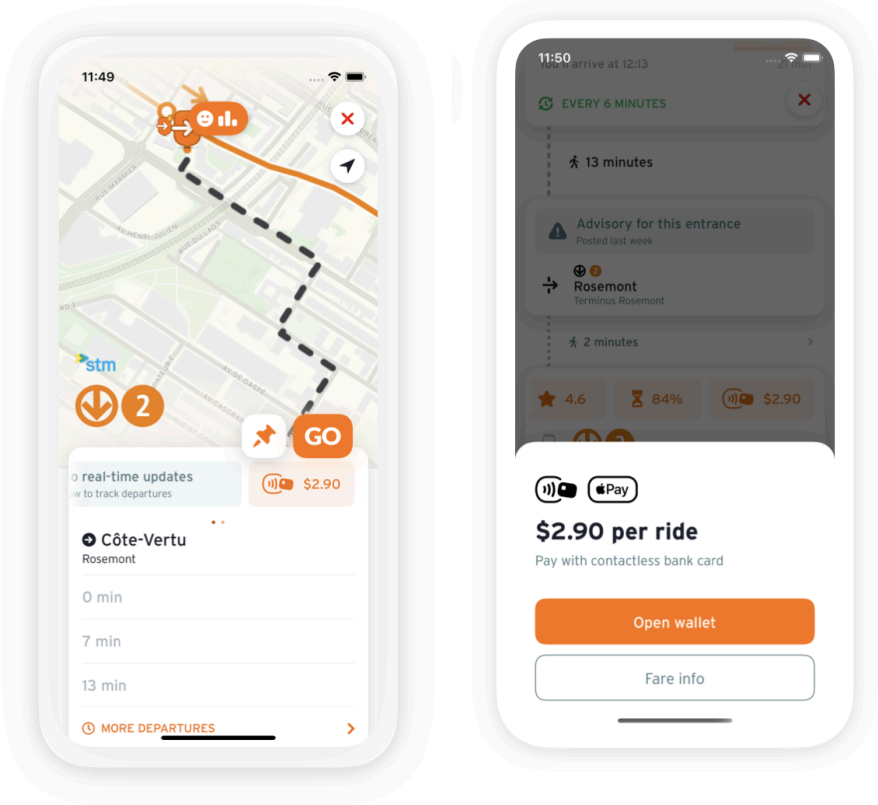
Fare Payment Integration

Transit works to make it as simple as possible to help riders pay for their fares – whatever the fare payment system — using a variety of tools, including:

- Automatic display of open loop payment via GTFS
- App-to-app integration
- Native mobile ticketing integration

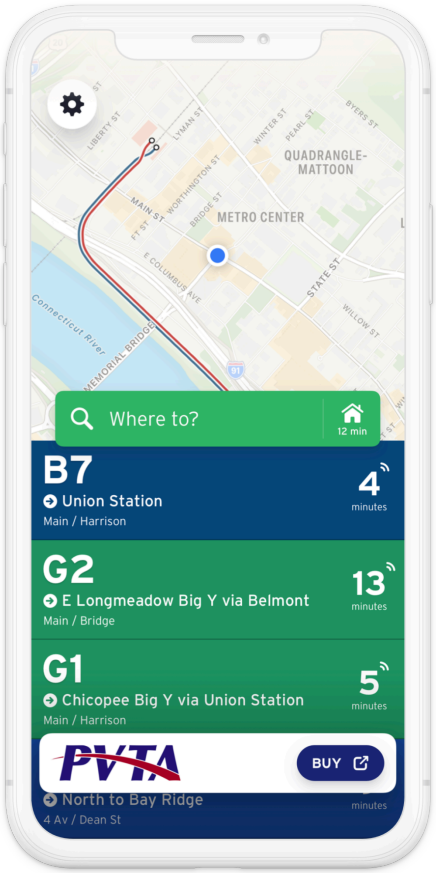
Contactless Payment

Wherever a transit agency accepts contactless payment, **we'll link riders directly to Apple Wallet on iOS or Google Wallet on Android** so they can instantly tap and pay for their ride. It all gets added to the app automatically, thanks to the industry-wide GTFS standard. When agencies share information about fares in Fares v2, a direct link to the user's phone's wallet instantly appears in the app, right beside info about how much it'll cost.



App-to-App: Fare Information Discoverability

Transit also supports app-to-app discovery, and links your riders from within our app to your fare payment provider's app. As shown for PVTA in Springfield, Massachusetts, *Transit* provides a link on the ticket bar of the Home Screen, driving discovery, adoption and daily usage of your fare payment system.



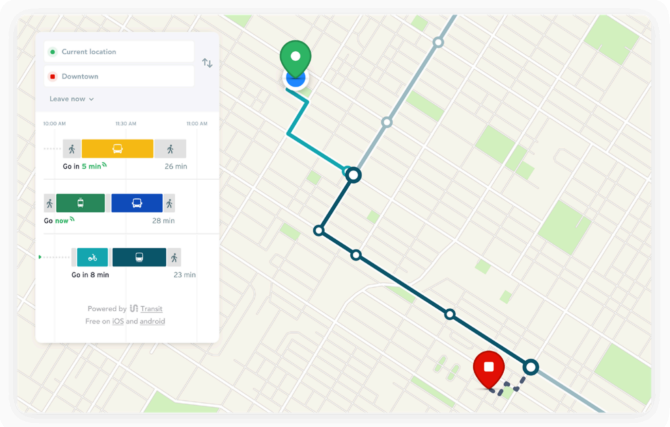
Native Mobile Ticketing In-App

Transit has partnered with leading mobile ticketing providers, including Masabi and Token Transit, to deliver a **complete ticketing experience within Transit for 100+ agencies across North America**. Since our first mobile ticketing launch in 2018, we've built a robust feature set that includes visual validation, QR code validation, stored-value accounts, account-based ticketing and fare-capping, cash reload at retail stores and fare vending machines, and origin-destination, inter-agency and inter-modal fares, and more, in one application, completely integrated.

Transit APIs for Web-based Trip Planning

Riders also need a great interface for trip-planning on the web: you can have its platforms run on our proprietary, well-tested trip planning engine that powers Transit. With our APIs, you get access to Transit's powerful services on your own website, app, or smart kiosk. Plus: riders who plan a trip on a Transit-powered platform can scan a QR code to open up the app and get on their way.

It's not just trip plans. Transit's APIs provide your riders with all the mobility options around a given location, in real time — from vehicle crowding, to accessibility, to bikeshare availability and on-demand pickup. Transit also has a suite of web development partners we work with depending on the functionality requested.



What's included with APIs for web-based trip-planning:

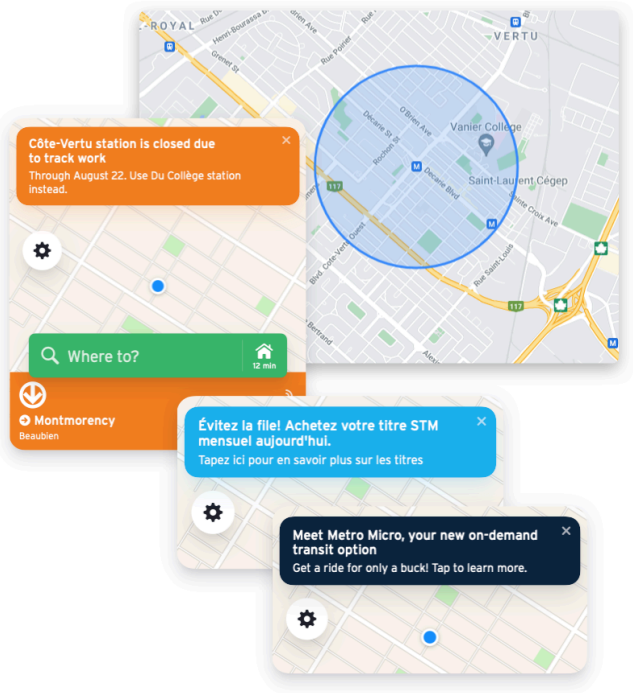
- A set of APIs for you to integrate and design trip planning and real-time information functionality into a web-based trip planner, digital displays at stations, or other rider information services in third-party digital touchpoints
- Detailed API features:
    - Stop locations (send lat/lon, receive a list of nearby stops)
    - Scooter/bikeshare locations (send lat/lon, receive a list of nearby vehicles/stations and detail)
    - Routes at a stop with real time (send stop id, receive routes, directions, ETAs)
    - Journey planning (send origin + destination location, receive transit, bike, walk and multimodal directions)
    - Deep link scheme to launch the Transit app
    - Complete integration of Auto-detected Detours through GTFS-RT TripModifications in APIs (if you elect to deploy Transit's Automatic Detour Detection and Display)
- Transit shall provide your agency an environment to test the features
- A secure download of data collected about users' journeys (e.g. planned origins and destinations) when using the API, provided on-request to your agency each month.

2. **Inform** your riders with strategic comms

In-app banners and push notifications

Transit's **Main Screen** banners communicate directly with riders who use Transit app already, and are the broadest and most-powerful communication tool we provide to the agencies we serve. Banners can be targeted by cohorts of riders, by language setting, rider behavior, location, and more, and can be linked to web pages ("Tap here for more information").

Transit's **Push Notifications** allow agencies to reach their intended audience, and send messaging to a defined cohort of riders (e.g. all users of a particular route who rely on Transit app), providing visibility outside the app on the phone's lock screen. Plus, push notifications catch riders who may have ignored or dismissed the Main Screen banner.

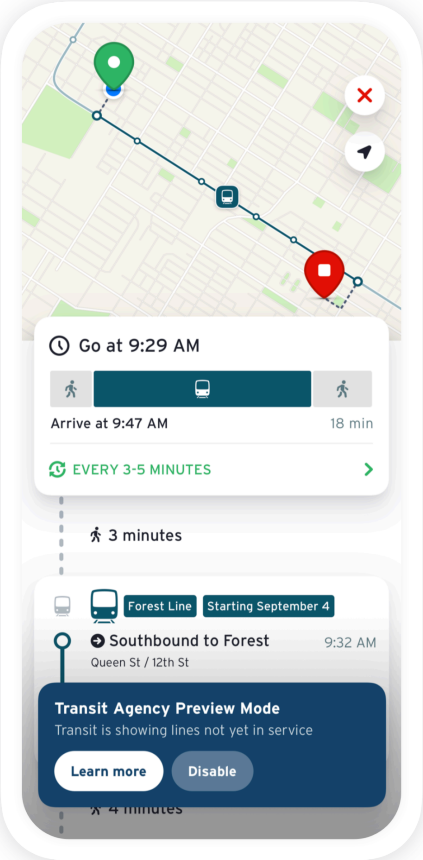


What's included in the **Inform** bundle:

- 12 banners per year for strategic comms; no cap on number of banners for unforeseen circumstances
- 12 push notifications per year with up to 2 behavioral cohorts per Push (e.g. English-speaking riders in a particular geographic area and Spanish-speaking riders in that same area would count as 2 cohorts).
- Audiences for each campaign can be targeted by app open location, language settings, and/or rider behavior, including routes the user has interacted with and origins and destinations.
- Translation services provided in-house for Spanish and French. Copy used in push notification and banner to be agreed upon by both your agency and Transit
- Banners will appear for 1-2 weeks per campaign

Network Change Previews for New Infrastructure & Route Redesigns

With *Transit*'s unique **Network Change Preview** tool, we make sure riders know a network change is going into effect — but more importantly, we show them *exactly how it will affect their daily trips*, showing them where their new stop is, what the new schedule is, and how long their new commutes will take in advance of a new network rollout.



For redesigns of routes or entire networks, *Transit*'s Network Change Previews provide a highly intuitive, visible, and interactive way for riders to understand how their commute will evolve, lessening friction on Day 1 of the new service. Moveover, Network Change Previews can also be used to solicit riders' feedback regarding two or more alternative route or network redesigns, making this a public-consultation tool as well as a way to communicate changes already decided.

Transit agencies like SEPTA in Philadelphia, the REM in Montreal, Miami-Dade Transit in Miami, COTA in Columbus, and VTA in Silicon Valley have all used Interactive Previews to assist with network roll-outs.

What's included with each Network Change Preview:

- Complete preview of new services (reflected on Transit's map, in the trip planner, and in schedules) that riders or agency staff can "play with"
    - Creation of a beta feed within the app and configuration.
    - Implement test GTFS within the app
    - Share test access to the appropriate group at your agency
    - Custom tag on any new lines denoting that they are coming soon, or with the name of the program

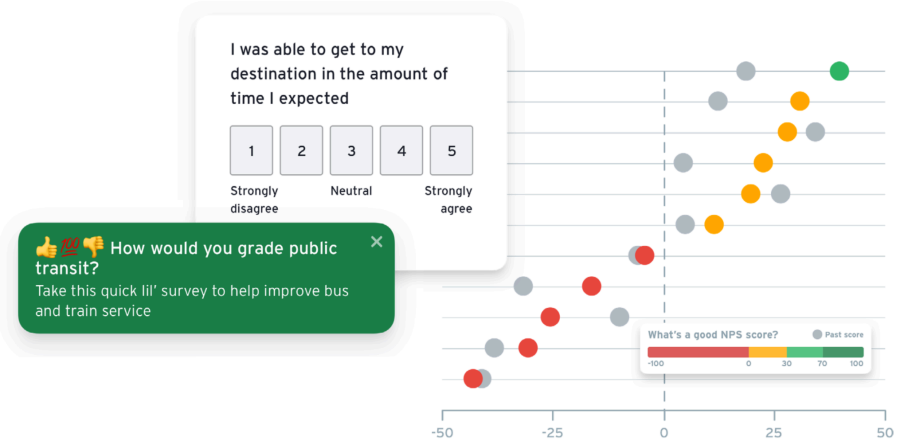
3. **Listen** to your riders with next-gen feedback mechanisms

Rider Happiness Benchmark (RHB) Quarterly Survey Program Subscription

Four times a year, Transit surveys app users across North America in a long form questionnaire about their commuting habits, satisfaction and demographics, called the **Rider Happiness Benchmark (RHB).**

Agencies who become RHB members get a customized report each quarter comparing their riders' responses to those of peer agencies and North American averages, complete access to response-level data to enable cross-tabulation of rider satisfaction with commute habits and with demographic characteristics, a detailed comparison table to benchmark your agency performance on rider satisfaction to all other North American agencies (60+ agencies, including New York, Montreal, Vancouver, Washington D.C., etc)

In the most-recent quarter (Q1 2025), the RHB survey collected ~30,000+ complete long-form responses from riders across North America.

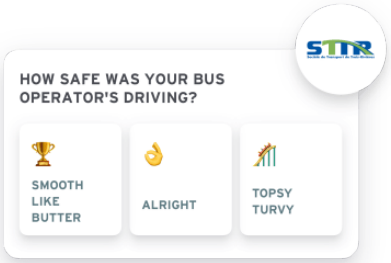


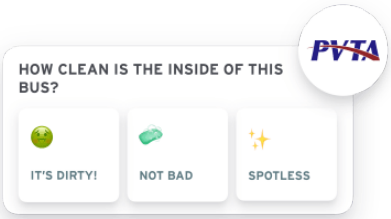
What's included with the RHB Quarterly Survey Program Membership:

- Four quarterly reports on your riders' responses per year, to be delivered no more than 4 weeks following the end of each survey's data-collection period
- Access to all scores across satisfaction questions for 60+ agencies each quarter, in.csv format for benchmarking purposes
- All response-level data from your riders
- Two seats on the RHB steering committee to propose new questions and weigh in on survey question evolution

Rate-My-Ride Intercept Survey

When it comes to rider feedback, timing is everything. Not many people will tell someone with a clipboard about how unsafe they felt onboard a bus three weeks prior. Even fewer will take the time to fill out a web form to report a vandalized bus shelter. Which means transit agencies miss out on useful intel: what goes unreported, goes unaddressed.





Rate-My-Ride is *Transit*'s core customer engagement tool. It's a real-time survey that appears for riders when they use GO Mode, our step-by-step navigation assistant and crowdsourcing generator. Thanks to their active participation in GO mode, riders willingly (though anonymously) share their precise location throughout their trip, allowing us to ask context-relevant Rate-My-Ride questions at each stage of their journey. And, thanks to a 2023 project with WMATA (Washington Metropolitan Area Transit Authority) Funded by the US Federal Transit Administration, Rate-My-Ride now asks riders conditional-logic follow-up questions as well.

Each response is automatically associated to the following GTFS data:

- route number
- trip_id (distinguishes the exact "run", vehicle, operator, etc)
- direction
- time of day and date
- origin stop_id and destination stop_id of rider's journey (including each portion of multi-part journeys)

But most importantly, subscribing to Rate-My-Ride allows your agency to set your own custom questions, including on a per-route basis, with four rounds of custom-question deployment available per year, 6 top-level questions per round, and 4 conditional follow-up questions per top-level question.

Responses to questions are viewable live in Transit's Rate-My-Ride dashboard, and can be exported at-will into CSV for analysis in the software of your choice, or integration into third-party CRMs.

What's included with the Rate-My-Ride Intercept Survey:

- Responses from your riders each week
- Four rounds of new custom questions per year (one per quarter):
    - Custom questions replace those already asked in-app. A maximum of 6 top-level questions can be asked in total over the course of a single trip, with up to 4 possible follow-up questions per top-level question.
    - Your agency, subject to Transit's reasonable approval, can determine at which stage of the journey the custom questions will be asked (waiting for the vehicle, on the trip, or at the trip end).
- Access and export response data to Rate-My-Ride questions
- Provide detailed rate-my-ride responses from riders delivered as a CSV file with complete response-level data organized by route, time, direction, and stop_id

Bundle Pricing Grid for RTA - 2025

All pricing is based on a fixed-route fleet size of 393 vehicles per the National Transit Database (2022).

Bundle + included services	Year One	Year Two	Year Three
Guide			
1. Royale for agencies 2. Flexible services integration 3. Fare payment integration 4. Transit APIs for Web-based Trip Planning	~~$331,750~~ **$79,620** 76% discount	**$83,601** 5% annual increase	**$240,591**
Inform			
5. In app banners & push notifications 6. Network change preview	~~$160,900~~ **$38,616** 76% discount	**$40,547** 5% annual increase	**$56,404**
Listen			
7. Rider Happiness Benchmark 8. Rate-My-Ride intercept survey	~~$222,360~~ **$53,366** 76% discount	**$56,034** 5% annual increase	**$171,946**

Line-Item Pricing for Royale and Fare Payment Integration

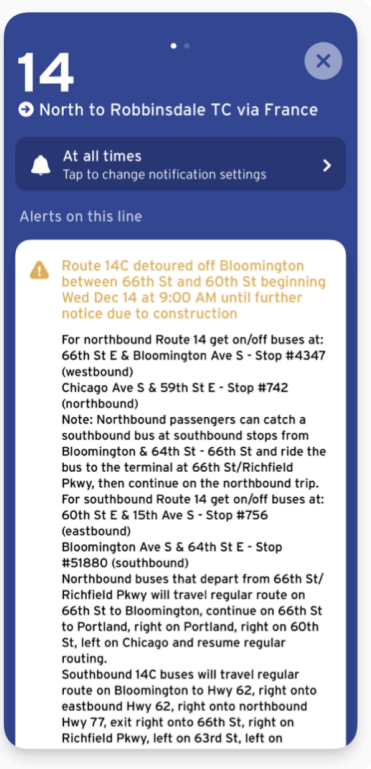
Royale for Agencies	Upfront Cost	Year One	Year Two	Year Three
Deploy RTA-branded Transit Royale to all riders of DDOT, SMART, Ann Arbor's The Ride, People Mover, QLine and MoGo Services at no cost to the rider, and provide paywall-free access to Transit app. Deploy RTA, or other regional branding in Transit app, allowing riders to swap out the Transit app icon for an agency or regional logo. All other agency benefits as listed above.	**N/A**	~~**$212,000**~~ **$50,000** **76% discount**	**$52,500** **5% annual increase**	**$233,730**
Fare Payment Integrations				
Fare payment integration, either via deeplink or native integration, using agency branding. Functionality dependent on transit agency's fare payment system and provider	**$0** *For existing partners (Masasbi, Bytemark, Token Transit)* **$10,000** *(for all new providers)*	**$0** ***Existing deployment of mobile ticketing for Ann Arbor exempt**	**$0**	**$0**

Quote Validity Period

The final version of this draft quote shall be honored until June 30, 2025. Following the first 2 years, pricing will fall in line with our regular pricing model.

Appendix: Additional Agency specific Products and Roadmap

Automatic detour detection and display

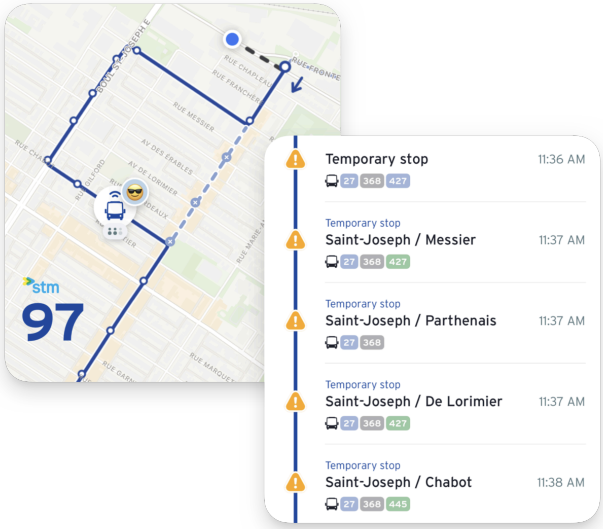


**Transit's detour product is not included in the highly-discounted Guide Bundle for the RTA, but can be discussed on a per-agency basis due to the nature of custom configuration.*

Real-time information and mobile apps have revolutionized the transit-riding customer experience over the past decade: everyone can now track their ride as it moves towards their stop in real-time, watch live arrival estimates countdown to zero, and see the entire route and list of upcoming stops projected on a map.

The moment a transit line is diverted onto a temporary route, however, all of these technological innovations disappear.

At best, agencies issue lengthy descriptions of the detour using the text field of service alerts (see right), requiring riders to read the alert and use local knowledge (if they have it) to visualize a detoured route's path.



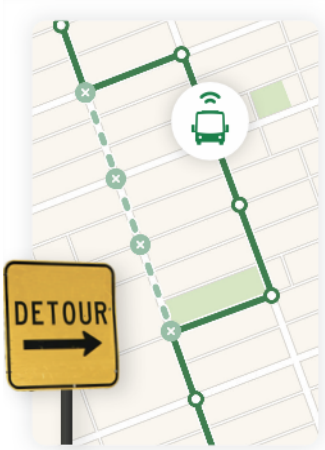
Until now. In a first-of-its-kind innovation, Transit can now use machine learning to detect and display detours as they happen, putting the new route path and temporary stops on the map in an easy-to-understand format for riders. We even include real-time ETAs to say when the bus will arrive at temporary stops. It's unlike anything else offered by any other app.

But it's about more than just our app: we also provide subscribing agencies with a real-time detour feed in a standardized GTFS-compliant data format, for use in other front-end interfaces, including web-based trip planners.

Automatic detour detection meaningfully improves the customer experience, boosts rider confidence and satisfaction, improves an agency's own data, and reduces the load on agency staff.

With Transit's automatic detection and display of detours, your agency can ensure the information you present to riders is consistent with on-the-ground truth.

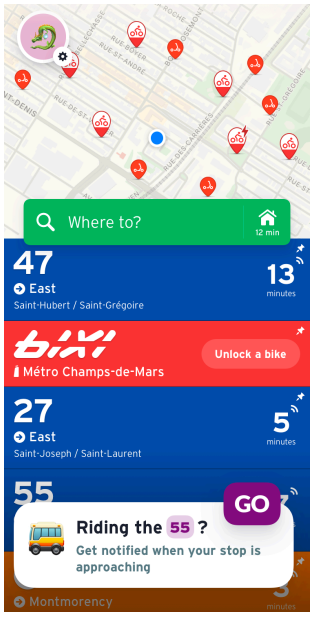
What's included with automatic detour detection and display:



- Automatic detection of detours as they occur (after 2-3 consecutive runs following identical detour)
- Notification of detour sent to your agency, including new route shape and stop locations in GTFS-TripModifications format ready for external use
- Display of detour route shape, including stop locations along detour, in Transit app
- Auto-generated service alert notification published in Transit app
- Once Transit detects the detour has ended (after 1-2 consecutive runs with regular stop pattern per static GTFS): Removal of detour route shape and skipped stop locations in Transit app, and new notification sent to your agency

Transit's Roadmap and Feature Development

Transit app partners also benefit from *Transit*'s continual feature improvements as we continue to leverage and expand the competitive edge *Transit* maintains over competing platforms like Google Maps. The following is a high-level overview for the next 18 months of what your agency can expect:



- **Releasing *Transit* 6.0** – an updated user interface, with most major redesigns done to the Route Details and Trip Details screens to present most important information like ETAs more prominently; scheduled to conclude in the first half of 2025.
- **Rolling out Achievements**, a new feature which creates additional incentives for users to complete individualized tasks via intrinsic and extrinsic motivation, for example riding the bus every day.
- **Developing a web-based trip planner,** to use both as a universal tool on Transit's website (https://transitapp.com/) and as an embeddable tool for public agencies to host on their own websites, so they can provide the same high-quality trip planning results to riders who prefer web-based transit directions. Transit's web trip-planner will facilitate the continuity of trip planning, allowing handoff from web to app-based trip-planning.
- **Improving our GO feature** to include step-by-step notifications (both audio and push notification) when walking (already available for public transportation and biking).
- **Improving GO with machine learning algorithms** and sensor fusion so that it functions to track user's trips and give them audio and text guidance even when GPS is unavailable.
- **Showing a "stop sheet"** which includes additional information about that stop, including amenities like shelters and shade and connecting lines. Allowing users to contribute to this information through our Rate-My-Ride functionality, which is triggered when someone is using the GO feature.
- **Improving support for automatic rerouting in GO** when a journey is no longer feasible. Currently users are only able to switch to the next vehicle on the same trip; this would allow users to switch to an alternate route.
- **Rider Reports:** allowing passengers to report issues in app as opposed to via e-mail, primarily for the service itself (e.g. reports of harassment, driver praise, lost & found, etc.)

In addition to the above, Transit will continue to release updates every 4 weeks to our app, with numerous bug fixes and smaller features added in each release.

Regional Transit Authority Of Southeast Michigan

BOARD OF DIRECTORS MEMORANDUM

TO:	RTA Board of Directors
FROM:	Ben Stupka, Executive Director
SUBJECT:	Drug and Alcohol Policy
DATE:	July 17, 2025
REQUESTED ACTION:	Board of Directors Approval

Approval Request:

This memo requests board approval of the Drug and Alcohol Policy.

Background:

The Drug and Alcohol Program regulation (49 CFR Part 40) is a U.S. Department of Transportation (DOT) regulation that outlines the procedures for drug and alcohol testing in the transportation industry, applying to all DOT-regulated employers and safety-sensitive employees. It specifies how tests must be conducted, how results are reported, and the steps for returning employees to duty after a violation. The regulation also holds employers accountable for compliance, even when using third-party service agents.

RTA's recent Triennial Review by the FTA identified deficiencies in its Drug and Alcohol Program that required the following corrective actions:

- Adoption of the program by the Board of Directors.
- Add the Safety Manager as the main point of contact.
- Add a procedure for reviewing the Drug and Alcohol records for new hires if they were previously employed by DOT employers (e.g., if a DDOT driver moves over to the QLINE, the RTA needs their DDOT records).
- Add a procedure for monitoring the implementation of a DOT compliant program at our current operational contractor (e.g. Michigan Flyer).
- Provide a record that all safety-sensitive employees have reviewed the updated program.

These updates have been included in **Attachment C1: RTA Drug and Alcohol Policy**, which must be approved by the Board of Directors.

Regional Transit Authority Of Southeast Michigan

QLINE

Drug and Alcohol Policy

Effective as of 07/31/2025

TITLE: Drug & Alcohol Program

Revision Number: 1	
Approved by (Committee): SSOC	Approval Date: 09/26/2024

Change Record

Revision Number	SSOC Approval Date	Responsible	Description of Change
1. 0	09/01/2022	Rachel Schmuhl	Initial Issuance
2. 1	09/26/2024	Rachel Schmuhl	RTA Transition
3. 2	06/12/2025	Rachel Schmuhl	Covered Employees updated and contractors' requirements.

Annual Review

Required Date:	Assigned to: Rachel Schmuhl

Recommended by:

General Manager:_____ Date:_____

Concurred By:

Chief Safety Officer:_____ Date:_____

Approved By:

Accountable Executive:_____ Date:_____

Table of Contents

Acronyms

BAC	Blood Alcohol Content
DAPM	Drug & Alcohol Program Manager
DER	Designated Employee Representative
EAP	Employee Assistance Program
MRO	Medical Review Officer
SAC	Substance Abuse Counselor
SAP	Substance Abuse Program

Definitions

Adulterated Specimen – A specimen that contains a substance that is not expected to be present in human urine or a substance expected to be present but is at a concentration so high that it is not consistent with human urine.

Alcohol- an organic compound in which a hydroxyl group is bound to a carbon atom

Alcohol Use – The drinking or swallowing of any beverage, liquid mixture, or preparation (including any medication) containing alcohol.

Accident- an unfortunate incident that happens unexpectedly and unintentionally, typically resulting in damage or injury.

Alcohol Concentration-
The concentration of alcohol in the blood expressed as the weight of alcohol in a fixed volume of blood and used as a measure of the degree of intoxication in an individual. The concentration depends on body weight, the quantity, and rate of alcohol ingestion, and alcohol absorption and metabolism rates. Also called *blood alcohol level*.

Breath Alcohol Technician – A person who instructs and assists employees in the alcohol testing process and operates an evidential breath testing device.

Canceled Test – A drug or alcohol test that has a problem identified that cannot be or has not been corrected or which 49 CFR Part 40 otherwise requires to be canceled. A canceled test is neither a positive nor a negative test.

Collector – A person who instructs and assists employees at a collection site, who receives and makes an initial inspection of the specimen provided by those employees, and who initiates and completes the Custody and Control form.

Controlled substance- A drug or other substance the government tightly controls because it may be abused or cause addiction.

Dilute Specimen – A specimen with creatinine and specific gravity values lower than expected for human urine.

Disabling Damage – Damage that precludes the departure of a motor vehicle from the scene of the accident in its usual manner in daylight after simple repairs.

1) Inclusion: Damage to a motor vehicle, where the vehicle could have been driven but would have been further damaged if so driven.
2) Exclusions:
    a. Damage that can be remedied temporarily at the scene of the accident without special parts or tools.
    b. Tire disablement without other damage even if no spare tire is available.
    c. Headlamp or taillight damage.
    d. Damage to turn signals, horn, or windshield wipers, which make the vehicle inoperable.

DOT, the department, DOT Agency- All DOT agencies, including but not limited to FAA, FRA, FMCSA, FTA, PHMSA, NHTSA, Office of Secretary (OST), and any designee of a DOT agency. For testing under 49 CFR PART 40, the USCG (in the Department of Homeland Security) is considered a DOT agency for drug testing purposes.

Drug and Alcohol Program Manager- The General Manager will oversee the Drug and Alcohol Program.

Evidential Breath Testing (EBT) Device- The NHTSA conforming products list (CPL) for evidential devices are the only devices you may use to conduct alcohol tests under 49 CFR Part 40.

FTA- The Federal Transit Administration, an agency of the US Department of Transportation.

HHS- The Department of Health and Human Services or any designee of the Secretary, Department of Health, and Human Services.

Medical Review Officer (MRO) – A licensed physician responsible for receiving and reviewing laboratory results generated by an employer's drug-testing program and evaluating medical explanations for specific drug test results.

Public Transportation Vehicle – a vehicle used to transport the public or for ancillary services.

Split Specimen – In drug testing, a part of the urine specimen that is sent to a first laboratory, retained unopened, and transported to a second laboratory if the employee requests that it be tested following a verified positive test of the primary specimen or a verified adulterated or substituted specimen.

Substance Abuse Professional (SAP) – A licensed physician (medical doctor or doctor of osteopathy) or licensed or certified psychologist, social worker, employee assistance professional, state-licensed, or certified marriage and family therapist, or drug and alcohol counselor (certified by an organization listed at https://www.transportation.gov/odapc/sap) with knowledge of and clinical experience in the diagnosis and treatment of drug and alcohol-related disorders.

Substituted Specimen – A specimen with creatinine and specific gravity values so diminished that they are not consistent with human urine.

Verified Test – A drug or validity test result from an HHS-certified laboratory that has undergone review and final determination by the MRO.

Drug and Alcohol Program Overview

This program complies with 49 CFR Part 655, as amended, and 49 CFR Part 40, as amended. The requirements can be found online at the Federal Transit Administration (FTA) Drug and Alcohol Program website: http://transit-safety.fta.dot.gov/DrugAndAlcohol/. Copies of Parts 655 and 40 are available in the drug and alcohol program manager's office, who is the General Manager or designee.

All covered employees must submit to drug and alcohol tests as a condition of employment per 49 CFR Part 655.

Portions of this program are not FTA-mandated but reflect the RTA policy. These additional provisions are identified by **bold text**.

In addition, DOT has published 49 CFR Part 32, implementing the Drug-Free Workplace Act of 1988, which requires establishing drug-free workplace policies and reporting certain drug-related offenses to the FTA.

All RTA employees are subject to the provisions of the Drug-Free Workplace Act of 1988.

The unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the workplace. An employee convicted of any criminal drug statute for a violation occurring in the workplace shall notify RTA's President or General Manager no later than five days after such conviction.

Pre-employment Release of Information

RTA will use the DOT Release of Information form (Appendix H) to verify the previous employers of employees entering safety-sensitive positions for any history of drug and alcohol misuse. This form will be requested during the onboarding process for employees coming from backgrounds where their previous employers required DOT testing within the two years prior to their hire date.

Covered Employees

This policy applies to every person, including applicants and transferees, who performs or will perform a "safety-sensitive function" as defined in Part 655, Section 655.4.

You are a covered employee if you perform any of the following:

- Operating a revenue service vehicle, in or out of revenue service
- Operating a non-revenue vehicle requiring a commercial driver's license

- Controlling movement or dispatch of a revenue service vehicle
- Maintaining (including repairs, overhaul, and rebuilding) a revenue service vehicle or equipment used in revenue service

Contractors for RTA

When a contractor has an employee who is covered under the RTA and falls under the "covered employee" section, the contractor is responsible for creating and maintaining a drug and alcohol program that meets FTA requirements. That program must be shared with the RTA and will stay in the electronic record-keeping system on SharePoint. The RTA will audit the contractors program compliance with federal requirements on an annual basis.

RTA Safety Sensitive Positions

- General Manager
- Maintenance of Way Manager
- Maintenance of Way Supervisors
- Maintenance of Way Technicians
- Fleet Maintenance Manager
- Vehicle Maintenance Supervisors
- Vehicle Maintenance Technicians
- Operations Manager
- Assitant Operations Manager
- Operations Supervisors
- Streetcar Operators
- Parts Clerk
- Safety Manager
- Training Manager

Employee Training

General

All safety-sensitive employees will undergo a minimum of one hour of training on the signs and symptoms of drug use, including the effects and consequences of drug use on personal health, safety, and the work environment. The training must also include manifestations and behavioral cues that may indicate prohibited drug use. Training will also include one hour of alcohol misuse.

Supervisors and Managers

Supervisors and Managers will also receive, in addition to the above training, one hour of reasonable suspicion training on the physical, behavioral, and performance indicators of probable drug use, as well as additional reasonable suspicion training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.

Acknowledgment

All employees must sign the acknowledgment form verifying that they have received the Drug and Alcohol Policy and training on the policy.

Record Keeping and Review

The RTA Drug and Alcohol Program will be reviewed annually by the Drug and Alcohol Program Manager and DER. RTA will also review all contractor's drug and alcohol programs on an annual review cycle. All records will be kept electronically on RTA's SharePoint with limited access for a minimum of five years.

Prohibited Substances

The use of illegal drugs is always prohibited. Prohibited drugs include, but are not limited to:

- Marijuana
- Cocaine
- Amphetamines
- Opioids
- Phencyclidine (PCP)

Hemp Products

Hemp Warning

Food products containing Hemp may have sufficient THC to cause impairment and produce positive marijuana drug test results.

The Hemp plant, from which marijuana is derived, also produces edible seeds that can be legally imported into the United States after they are "sterilized," a process intended to render the seed incapable of being sprouted and to remove "all traces of THC." All hemp food packaging is labeled as "CONTAINS NO THC." This may be inaccurate. One major manufacturer advertises that they have the lowest THC levels at only 33

parts per million. Others say residual THC in their products is under 50 parts per million and claim competitive products may contain as much as 1,300 parts per million.

Because RTA is concerned for workplace safety, which THC could jeopardize from any source, employees are encouraged to refrain from using Hemp containing food products until the effectiveness of seed sterilization in removing THC can be documented through independent testing.

If a job applicant or employee claiming to use hemp-containing food products tests positive for marijuana, the test is considered positive. All positive drug-test results will warrant immediate discharge.

Prohibited Behavior

All covered employees are prohibited from consuming alcohol within four (4) hours before performing safety-sensitive job functions.

All covered employees required to take a post-accident test are prohibited from consuming alcohol for eight (8) hours following involvement in an accident or until they submit to the post-accident drug and alcohol test, whichever occurs first.

All covered employees are prohibited from performing or continuing to perform safety-sensitive functions with an alcohol concentration of 0.04 or greater.

All covered employees are prohibited from consuming alcohol while performing safety-sensitive job functions or while on-call to perform safety-sensitive job functions. If an on-call employee has consumed alcohol, they must acknowledge the use of alcohol at the time that they are called to report for duty. If the on-call employee claims the ability to perform their safety-sensitive function, they must take an alcohol test with a result of less than 0.02 before performing safety-sensitive job functions. If the test is failed, failure can result in disciplinary action. If an employee is on-call, consumes alcohol, and notifies the supervisor, this can also result in disciplinary action.

Circumstances for Testing

Pre-Employment Testing

Pre-employment alcohol tests are conducted after making a contingent offer of employment or transfer. All pre-employment alcohol tests will be conducted using the procedures outlined in 49 CFR Part 40. An alcohol test result of less than 0.02 is required before an employee can first perform safety-sensitive functions. If a pre-employment alcohol test is canceled, the individual will be required to undergo another test with a result of less than 0.02 before performing safety-sensitive functions.

A negative pre-employment drug test result is required before an employee can first perform safety-sensitive functions. If a pre-employment test is canceled, the individual must undergo another test and successfully pass with a verified negative result before performing safety-sensitive functions.

If a covered employee has not performed a safety-sensitive function for 90 or more consecutive calendar days and has not been in the random testing pool, the employee must take and pass a pre-employment test before returning to a safety-sensitive function.

A covered employee or applicant who has previously failed or refused a DOT pre-employment drug and alcohol test must provide proof of completing a referral, evaluation, and treatment plan meeting DOT requirements.

Random Testing

Random drug and alcohol tests are unannounced and unpredictable, and the dates for administering random tests are spread reasonably throughout the calendar year. Random testing will be conducted at all times of the day when safety-sensitive functions are performed.

Testing rates will meet or exceed the minimum annual percentage rate set each year by the FTA administrator. The current year's testing rates can be viewed online at www.transportation.gov/odapc/random-testing-rates.

The selection of employees for random drug and alcohol testing will be made by a scientifically valid method, such as a random number table or a computer-based random number generator. Under the selection process, each covered employee will have an equal chance of being tested each time selections are made.

A covered employee may only be randomly tested for alcohol misuse while performing safety-sensitive functions, just before the employee is to perform safety-sensitive functions, or just after the employee has ceased performing such functions. A covered employee may be randomly tested for prohibited drug use while on duty.

Each covered employee notified of random drug or alcohol testing selection must immediately proceed to the designated testing site.

Post-Accident Testing

Covered employees shall be subject to post-accident drug and alcohol testing under the following circumstances for FTA thresholds:

Fatal Accidents

As soon as practicable following an accident involving the loss of human life, drug and alcohol tests will be conducted on each surviving covered employee operating the public transportation vehicle at the time of the accident. In addition, any other covered employee whose performance could have contributed to the accident, as determined by RTA using the best information available at the time of the decision, will be tested.

Non-fatal Accidents

As soon as practicable following an accident not involving the loss of human life, drug and alcohol tests will be conducted on each covered employee operating the public transportation vehicle at the time of the accident if at least one of the following conditions is met:

(1) The accident results in injuries requiring immediate medical treatment away from the scene unless the covered employee can be completely discounted as a contributing factor to the accident
(2) One or more vehicles incur disabling damage and must be towed away from the scene unless the covered employee can be completely discounted as a contributing factor to the accident
(3) The vehicle is a rail car, trolley car, bus, or vessel and is removed from operation unless the covered employee can be completely discounted as a contributing factor to the accident

In addition, any other covered employee whose performance could have contributed to the accident, as determined by RTA using the best information available at the time of the decision, will be tested.

A covered employee subject to post-accident testing must remain readily available, or it is considered a refusal to test. Nothing in this section shall be construed to require the delay of necessary medical attention for the injured following an accident or to prohibit a covered employee from leaving the scene of an accident for the period required to obtain assistance in responding to the accident or to obtain necessary emergency medical care.

Reasonable Suspicion Testing

All covered employees shall be subject to a drug and alcohol test when RTA has reasonable suspicion to believe that the covered employee has used a prohibited drug and engaged in alcohol misuse. A reasonable suspicion referral for testing will be made by a trained supervisor or other trained company official based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech, or body odors of the covered employee.

Covered employees may be subject to reasonable suspicion of drug testing at any time while on duty. Covered employees may be subject to reasonable suspicion of alcohol testing while the employee performs safety-sensitive functions, just before the employee performs safety-sensitive functions, or after the employee has ceased performing such functions.

Return to Duty and Follow-Up Alcohol and Drug Testing

Any employee allowed to return to duty after failing an alcohol or drug test or following leave for substance abuse rehabilitation must first provide a negative drug, alcohol (or both) test result. Employees returning to duty following leave for substance abuse rehabilitation may be required to undergo unannounced follow-up alcohol or drug testing as directed by a substance abuse professional (SAP). The SAP shall direct the number and frequency of such follow-up testing. The employee will be subject to follow testing for as long as the SAP prescribes, but such testing shall not continue beyond five years from when the employee returns to safety-sensitive duties. Any such employee failing a drug screen test or having a breath alcohol test result of 0.02 percent or higher will be relieved of their duties immediately. Any employee with a positive drug screen test or breath alcohol test result of 0.04 percent or greater during this period shall be immediately terminated from employment with the RTA and referred to a locally available SAP for evaluation per 49 CFR Part 40.

Alcohol and Drug Screening Following Injures and Upon Return to Duty following a Leave of Absence

Any employee who sustains an injury on the job will be required to submit an alcohol test and a drug screen test as part of the physician's examination of the employee for the injury.

Any employee returning to duty following a leave of absence from the company for 90 calendar days or more must submit an alcohol test and a drug screen test.

Requirement to Submit

All covered employees must submit to Drug & Alcohol tests as a condition of employment per 49 CFR Part 655.

Period of Coverage

- Drug test – anytime while on duty
- Alcohol test (random, reasonable suspicion, & follow-up) – just before, during, or immediately after the actual performance of safety-sensitive functions

Testing Procedures

All FTA drug and alcohol testing will be conducted in accordance with 49 CFR Part 40, as amended.

Dilute Urine Specimen

If there is a negative dilute test result, RTA will conduct one additional retest. The result of the second test will be the test of record. Dilute negative results with a creatinine level greater than or equal to 2 mg/dL but less than or equal to 5 mg/dL require an immediate recollection under direct observation (see 49 CFR Part 40, section 40.67).

Split Specimen Test

In the event of a verified positive test result or a verified adulterated or substituted result, the employee can request that the split specimen be tested at a second laboratory. RTA guarantees that the split specimen test will be conducted in a timely fashion.

Test Refusals

As a covered employee, you have refused to test if you:

(1) Fail to appear for any test (except a pre-employment test) within a reasonable time, as determined by RTA.
(2) Fail to remain at the testing site until the testing process is complete. An employee who leaves the testing site before the testing process commences for a pre-employment test has not refused to test.

(3) Fail to attempt to provide a breath or urine specimen. An employee who does not provide a urine or breath specimen because they had left the testing site before the testing process commenced for a pre-employment test has not refused to test.
(4) In the case of a directly observed or monitored urine drug collection, fail to permit monitoring or observation of your provision of a specimen.
(5) Fail to provide a sufficient quantity of urine or breath without a valid medical explanation.
(6) Fail or decline to take a second test as directed by the collector or RTA for drug testing.
(7) Fail to undergo a medical evaluation as required by the MRO, DO, or RTA's Designated Employee Representative (DER).
(8) Fail to cooperate with any part of the testing process.
(9) Fail to follow an observer's instructions to raise and lower clothing and turn around during a directly observed test.
(10) Possess or wear a prosthetic or other device used to tamper with the collection process.
(11) Admit to the adulteration or substitution of a specimen to the collector or MRO.
(12) Refuse to sign the certification at Step 2 of the Alcohol Testing Form (ATF).
(13) Fail to remain readily available following an accident.

As a covered employee, if the MRO reports that you have a verified adulterated or substituted test result, you have refused to take a drug test.

As a covered employee, you incur the same consequences as testing positive if you refuse to take a drug and alcohol test. You will be immediately removed from performing safety-sensitive functions and referred to an SAP.

Consequences for Violations

Following a positive drug or alcohol (BAC at or above 0.04) test result or test refusal, the employee will be immediately removed from safety-sensitive duty and referred to a Substance Abuse Professional.

Following a BAC in the range of 0.02 to 0.039, the employee will be immediately removed from safety-sensitive duties until the start of their next regularly scheduled duty period (but for not less than eight hours) unless retest results in the employee's alcohol concentration being less than 0.02. **The employee will be subjected to discipline.**

Zero Tolerance

Per RTA policy, any employee who tests positive for drugs or alcohol (BAC at or above 0.04) or refuses to test will be referred to a Substance Abuse Professional (SAP) and may be terminated or lose their certification.

Voluntary Self-Referral

Any employee who has a drug and alcohol abuse problem and has not been notified of the requirement to submit to reasonable suspicion, random or post-accident testing or has not refused a drug or alcohol test may voluntarily refer themselves to either the President, General Manager, or Designated Employer Representative who will direct the individual to RTA's Employee Assistance Program (EAP).

The EAP offers help for employees to maintain or improve job performance by assisting employees in addressing personal problems. One component of the EAP is help for employees with substance abuse.

A substance abuse counselor (SAC) will evaluate the employee and make a specific recommendation regarding the appropriate treatment. Employees are encouraged to voluntarily seek professional substance abuse assistance before any substance use or dependence affects job performance.

Any safety-sensitive employee who admits to a drug and alcohol problem will immediately be removed from their safety-sensitive function and will not be allowed to perform such until completing a prescribed rehabilitation program.

Prescription Drug Use

Employee Reporting of Prescribed Drugs

RTA's Policy states that to protect employees, passengers, and the public, safety-sensitive employees must ensure that any prescribed drug or combination of medications used will not adversely impact job performance. The employee shall ask the prescribing licensed medical practitioner approving the medication to ensure that the employee's job duties can be performed safely and provide in writing to RTA. Employees can obtain a Medication Approval Form from the Human Resources Department. A copy of the Medication Approval Form is provided in Section 17 of this policy.

Prescribed Drugs That Do Not Need to Be Reported

Drugs on the Medication Approval Form listed under the section titled "Drugs That Do Not Need to Be Reported" do not need to be reported, whether taken alone or in

combination with other drugs that do not need to be reported. This includes antibiotics, oral contraceptives, vitamins, local dental injections, creams, ointments, and lotions. When using a drug that does not need to be reported, the employee must ensure that the drug taken is the same as the drug on the list.

Prescribed Drugs That Must Be Reported

Safety-sensitive employees must report prescribed drugs that are not on the list under "Drugs That Do Not Need to Be Reported" with or without restrictions.

The appropriate use of legally prescribed drugs and non-prescription medications is not prohibited. However, the use of any substance which carries a warning label that indicates that mental functioning, motor skills, or judgment may be adversely affected must be reported to their supervisor or the DER. In addition, the employee must obtain a written release (Medication Approval Form APPENDIX F) from the attending physician, releasing the person to perform their job duties any time they obtain a performance-altering prescription.

A legally prescribed drug means that the individual has a prescription or other written approval from a physician for the use of a drug during medical treatment. It must include the patient's name, the name of the substance, the quantity /amount to be taken, and the period of authorization. The misuse or abuse of legal drugs while performing transit business is prohibited.

Over-the-Counter Medications

When selecting an over-the-counter medication, safety-sensitive employees must read all warning labels before choosing it for use in an operational status. Medications whose labels indicate they may affect mental function, motor skills, or judgment should not be selected. The advice of a pharmacist, if available at the purchase site, may be helpful in selecting medications appropriate to the employee's job duties. If no alternate medicine is available for the condition, employees should seek professional assistance from their pharmacist or physician. Ultimately, the employee may be the best judge of the impact of a substance on the ability to perform job duties safely. As such, the employee has the responsibility to refrain from using any over-the-counter medication that causes performance-altering side effects, whether or not the label warns of them. Although safety-sensitive employees are not required to provide written notice to RTA when using over-the-counter medications, it is highly recommended that the employee confers with a physician regarding possible adverse side effects that may impair job performance.

Side Effects

Regardless of medications or previous approvals, employees who experience medication side effects or do not feel fit for duty must consult their physician and immediately refrain from performing hazardous activities, including all safety-sensitive functions.

How to Report Medication

The employee's licensed medical practitioner must read and sign the Medication Approval Form to report a medication. Employees should bring medication approval forms when they visit their doctor. This form must be returned to RTA's HR Specialist before resuming safety-sensitive functions. Documents may be hand-delivered, mailed, or faxed. (RTA's Medication Approval Form can be found in Appendix F.)

Employees are responsible for explaining their job duties to their medical practitioner and ensuring that the use of prescribed medication will not pose a safety risk to themselves, other employees, or the public. It is recommended that the employee provide the medical professional with a current job description.

If the employee's use of a prescription or over-the-counter drug endangers the employee, other employees, or the public or has contributed to an accident, the employee will be subject to discipline, including discharge, under the RTA policy.

Confidentiality of Records and Verification

Medication Approval Forms will be kept in a confidential medical file under the control of Human Resources and may be verified by RTA's medical contractor. If an employee's physician and RTA's Medical Contractor differ regarding the use of a medication, the Occupational Medical Services Specialist will work with the employee's physician and RTA's Medical Contractor to resolve the disagreement.

References

https://transit-safety.fta.dot.gov/DrugAndAlcohol/Publications/Documents/substance/ImplementationGuidelines/ImplementationGuidelines_Oct2009.pdf

https://transit-safety.fta.dot.gov/DrugAndAlcohol/Publications/Documents/safety/bestpractices/bestpractices_oct2009.pdf

https://transit-safety.fta.dot.gov/DrugAndAlcohol/Tools/PolicyBuilder/CreatePolicy.aspx

https://transit-safety.fta.dot.gov/DrugAndAlcohol/Publications/Documents/substance/RxOTC/RxOTC_April2011_Feb2012_Update.pdf

APPENDIX A: Contact Person

The RTA Handbook and annual Drug and Alcohol Training will provide employees with the contact person for questions about RTA's anti-drug and alcohol misuse program.

The Designated Employee Representative (DER) or Designee will be the employee contact.

DRUG AND ALCOHOL PROGRAM AND COMPLIANCE MANAGER (DAMP)-Rachel Schmuhl		
Telephone	707-981-6527	
E-mail	rschmuhl@rtamichigan.org	

DESIGNATED EMPLOYER REPRESENTATIVES (DER)- Stace Babcock		
Telephone	313-500-5496	
E-mail	sbabcock@rtamichigan.org	

MEDICAL REVIEW OFFICER- Paul Teynor, MD		
Telephone	888-249-4575	
E-mail	801-994-9953	

EMPLOYEE ASSISTANCE PROGRAM (EAP) New Directions		
Telephone	1-800-624-5544	
E-mail	Eap.ndbh.com	

APPENDIX B: Notice of Selection for Random Drug and Alcohol Screening.

NOTICE OF SELECTION FOR RANDOM DRUG AND ALCOHOL SCREENING

Employee Name: _____

Notification Date: _____ Time: _____

You have been selected for a random DRUG TEST (or DRUG & ALCOHOL TEST) under the RTA Zero Tolerance Drug and Alcohol Policy. You are required to acknowledge receipt of this notice and its date and time of delivery and consent to release of test results by providing your signature below. You are also required to bring any paperwork / documents provided by Concentra as proof of your testing.

You must report to Concentra within one (1) hour of receipt of this notice and present the random testing forms to the onsite personnel. Failure to report for testing will be grounds for termination.

TO BE COMPLETED BY EMPLOYEE:

Release: I, the undersigned employee, give my permission for the test results for the RTA Zero Tolerance Drug and Alcohol Policy to be released to RTA. I understand my compliance status with Policy requirements will be accessible by RTA.

I acknowledge that I have received this Notice of Random Selection on the date and time indicated on this form.

Employee Signature: _____ Date: _____

TO BE COMPLETED BY RTA SUPERVISOR OR MANAGER:

Date and Time of arrival at Concentra: _____

Documents Received from Employee: _____

_____

Comments: _____

_____

Return signed form and required documentation to Stacey Babcock

Notice of Selection for Random
2024-10-01 v.1

APPENDIX C: Pre-Employment Drug Testing Notification

PRE-EMPLOYMENT DRUG TESTING NOTIFICATION AND ACKNOWLEDGEMENT

I hereby acknowledge and understand that, as part of my application for employment for a position which involves the performance of safety-sensitive functions as defined by 49 CFR Part 655, as amended, I must submit to a urine drug test under the authority of the U. S. Department of Transportation, Federal Transit Administration. I acknowledge and understand that any offer of employment is contingent on the passing of the aforementioned drug test and I will not be assigned to perform a safety-sensitive function unless my urine drug test has a verified negative result having no evidence of prohibited drug use.

_____ _____

Signature of Applicant Date

_____

Print Name

Witness: _____ _____

Signature Date

_____

Print Name

(Your application will not be considered for employment for a covered safety-sensitive position unless this acknowledgement is completed and signed.)

APPENDIX D: Employer's Authorization for Examination or Treatment

Concentra health solutions

EMPLOYER'S AUTHORIZATION FOR EXAMINATION OR TREATMENT

(MUST PRESENT PHOTO ID AT TIME OF SERVICE)

Patient Name: _____ CDL #: _____

Company Name: Regional Transit Authority of Southeast Michigan SSN/EID: _____

Address: 7520 WOODWARD AVE Date of Birth: _____

City, State, Zip: DETROIT, MI 48202

SUBSTANCE ABUSE TESTING

NOTES TO CLINIC:

- QUEST LAB ACCOUNTS
  DOT: 11176946
  Non-DOT:
- Fax MRO Copy to 801-994-9953, mail original

TESTING AUTHORIZED:

☐ Non-Regulated Urine Collect ONLY (use Quest Account)
Use testing panel:

☐ Regulated Urine Collect ONLY (use Quest Account)
○FMCSA ○FAA ○FTA ○PHMSA ○FRA ○USCG

☐ Breath Alcohol Test: ○DOT ○Non-DOT
(Please fax all Breath Alcohol Results to CMCA at 603-772-0179)

REASON FOR TEST:

☐ Pre-Employment
☐ Random
☐ Post-Accident
☐ Reasonable Cause
☐ Other

☐ Return to Duty
(DOT Must be observed)
☐ Follow-up
(DOT Must be observed)

TPA: ***Bill TPA for substance abuse components***
Concentra/CMCA/33014
118 Portsmouth Avenue, Suite B202
Stratham, NH 03885
1.800.775.5447

LAB:
Quest Diagnostics
10101 Renner Blvd.
Lenexa, KS 66219

MRO:
Paul Teynor, MD
1430 South Main St, Ste. C
Salt Lake City, UT 84115
Ph: 888.249.4575
Fax: 801.994.9953

Designated Employer Representative:
DER: Stace Babcock
Phone: 313-500-5496

Authorized By: _____
Phone: _____
Date: _____

CMCA Form Revised 3/25/2020

APPENDIX E: List of Drugs that do not need to be reported

DRUGS THAT DO NOT NEED TO BE REPORTED

The following drugs do not need to be reported, unless known by the employee to cause problems, or if restrictions are imposed by the prescribing physician.

Antibiotics
All

Birth Control Pills
All

Dental
Lidocaine
Xylocaine

Immunizations
All

Topical Agents
Lotions, Creams, etc.

Vitamins
All

Breathing Medications/ Anti-Histamine
Breathaire
Entex
Guaifensin
Hismanal
Ipratropium Inhaler
Kenalog
Nasalide
Phyenylpropanolamine
PPA-GG-LA
Pseudoephedrine
Seldane
Sine-Aid
Sudafed
Terbutaline Inhaler
Terbutaline
Terienadine
Theo-Dur
Theopnilline
Zephrex

Analgesics
Acetominophen
Advil
Anacin-3
Anaprox
Aspirin
Datril
Fenoprofen
Ibuprofen
Indocin Medipren Motrin
Nalfon
Naprosyn
Nuprin
Panadol
Rufin
Trendar
Tylenol

Anti-hypertensives
Aldactide
Aldactone
Aldomet
Calan
Capoten
Captopril
Catapres TIS
Catapress
Chlorothiazide
Diuril
Enalapril
HCTZ
Hydrodiuril
Hydrochlorothiazide
Lasix
Lisinopril
Lopressor
Methyldopa
Moduretic
Prinvil
Procardia
Vasoretic
Vasotec

Miscellaneous
Ablalon A Opth Drops
Acyclovir
Aristocort
Beconase
Carafate
Cimetidine
Colbenemid
Cortosone
Digoxin
Donnagel
Ergotee
Lanoxin
Meclomen
Prednisone
Prilosec
Synthroid
Tagamet
Vancenase Viagra
Zantac

APPENDIX F: Medication Approval Form

TO BE COMPLETED BY THE EMPLOYEE:

EMPLOYEE NAME		**DATE**	
EMPLOYEE TITLE/DEPARTMENT		**ID NO.**	
WORK PHONE NO.			

The information provided in this Medication Approval Form is true and correct to the best of my knowledge. I understand and will comply with the prescribed use of these medications and their restrictions while working.

_____

Employee Signature

TO BE COMPLETED BY THE PHYSICIAN:

Please complete this form so your patient can work in his or her safety-sensitive position. By signing below, you acknowledge that you know this employee's job requirements and that the prescribed medication(s) currently being taken will not adversely impair performance or endanger the safety of this individual, coworker, customer, or public. Please indicate below what restrictions should be placed upon when medication is taken and when the individual can safely perform his or her job duties.

Name of Drug	Date Prescribed	Date Approval Expires	Restrictions/Instructions

_____

Print Physician Name

_____ **Date** _____

Physician Signature

Please Print Name, Address, and Phone Number Below:

Name: _____

Address: _____

Phone No. _____

APPENDIX G: Post Accident Drug and Alcohol Testing Decision Makers Form

rta Regional Transit Authority Of Southwest Michigan

POST-ACCIDENT DRUG AND ALCOHOL TESTING DECISION-MAKERS FORM

Accident Information:

Date of Accident: _____ Time of Accident: _____ AM / PM

Employee Name: _____

The Federal Transit Administration (FTA) drug and alcohol testing regulation (49 CFR Parts 655) requires that safety-sensitive employees involved in a vehicle accident (as defined below) submit to tests for alcohol misuse and prohibited drug use as soon as possible following the accident, 49 CFR Part 655 also requires the testing of any other safety-sensitive employee whose performance could have contributed to the accident, as determined by the manager or supervisor at the scene using the best information available at the time of the decision.

FTA Decision Maker Questions:

1. A loss of life occurring at the scene or within 30 days following the accident? Yes ☐ No ☐
2. A report of a serious injury to a person? Yes ☐ No ☐
3. A collision between multiple rail transit vehicles? Yes ☐ No ☐
4. A collision resulting in substantial damage? Yes ☐ No ☐
5. A runaway train? Yes ☐ No ☐
6. An evacuation for life safety reasons? Yes ☐ No ☐
7. Any derailment of a rail transit vehicle? Yes ☐ No ☐

If you answer YES to any of these questions, a DOT/FTA Post Accident test is required unless you answer YES to the following question:

8. Can you determine, using the best information available at the time of the decision, that the employee's performance can be completely discounted as a contributing factor to the incident? Yes ☐ No ☐
   a. If NO, an FTA Drug and Alcohol Test are REQUIRED
   b. If YES, explain below. In this case, FTA Drug and Alcohol Tests are PROHIBITED

9. Other than the Operator, could the performance of any other safety-sensitive employee(s) have contributed the Accident, using the best information available? Yes ☐ No ☐
   a. If YES, plan to immediately post-accident test employee(s)
10. Did you decide to perform a Drug or Alcohol Test? Yes ☐ No ☐
    a. If YES, complete Page 2 of this form (Back)
    b. If NO, no further action is required

Additional Information:

_____
_____
_____
_____
_____
_____
_____

D&A Decision Maker Form 2024-10-08 v. 2

Testing Information:

Collection Site Location:_____ **Time Arrived:** _____**AM/PM**

1. Was the Alcohol Test performed within 2 hours of the time of the accident? Yes ☐ No ☐
   a. If NO, explain:
   _____
   _____
   _____

2. Was the Alcohol Test performed within 8 hours of the time of the accident? Yes ☐ No ☐
   a. If NO, explain:
   _____
   _____
   _____
   b. If the Alcohol Test is not conducted within <u>8 hours</u> cease all efforts to administer the test.

3. Was the Drug Test performed within 32 hours of the time of the accident? Yes ☐ No ☐
   a. If NO, explain:
   _____
   _____
   _____
   b. If the Drug Test is not conducted within <u>32 hours</u> cease all efforts to administer the test.

The above documentation was provided by:

Supervisor Name:_____ Phone No: _____

Signature: _____ Date: _____

APPENDIX H: Release of Information Form

Regional Transit Authority
Of Southeast Michigan

Release of Information Form – 49 CFR Part 40 Drug and Alcohol Testing

Section I: To be completed by the new employer and signed by the employee, and transmitted to the previous employer.

Employee Name: _____ SS/ID Number: _____

I hereby authorize release of information from my DOT-regulated drug and alcohol testing records by my previous employer, listed in *Section I-B* to the employer listed in *Section I-A*. This release is in accordance with DOT Regulation 49 CFR Part 40, section 40.25.

_____ _____
Employee Signature **Date**

I-A:
New Employer Name: _____
Designated Employer Representative: _____
Address: _____
Phone #: _____ Fax #: _____

I-B:
Previous Employer Name: _____
Designated Employer Representative: _____
Address: _____
Phone #: _____ Fax #: _____

Section II: To be completed by the previous employer and transmitted to the new employer.

II-A:
In the two years prior to the date of the employee's signature (in Section I), for DOT-regulated testing:

1. Did the employee have alcohol tests with a result of 0.04 or higher? **Yes____ No____**
2. Did the employee have verified positive drug tests? **Yes____ No____**
3. Did the employee refuse to be tested? **Yes____ No____**
4. Did the employee have other violations of DOT agency drug and alcohol testing regulations? **Yes____ No____**
5. Did a previous employer report a drug and alcohol rule violation to you? **Yes____ No____**
6. If you answered "Yes" to any of the above items, did the employee complete the return to duty process? **Yes____ No____**

II-B:

Person providing information in Section II-A:

Name: _____ Title: _____
Phone #: _____ Date: _____

Regional Transit Authority
Of Southeast Michigan

BOARD OF DIRECTORS MEMORANDUM

TO:	RTA Board of Directors
FROM:	Ben Stupka, Executive Director
SUBJECT:	QLINE Public Transportation Agency Safety Plan
DATE:	July 17, 2025
REQUESTED ACTION:	Board of Directors Approval

Approval Request:

This memo requests board approval of the QLINE Public Transportation Agency Safety Plan.

Background:

The Public Transportation Agency Safety Plans (PTASP) regulation (49 CFR Part 673) requires operators of public transportation systems that receive federal funds under the FTA Urbanized Area Formula Grants (Section 5307), and rail transit agencies subject to the FTA State Safety Oversight (SSO) program, to develop an Agency Safety Plan (ASP) that includes the processes and procedures to implement a Safety Management System (SMS). SMS is a comprehensive, collaborative, and systematic approach to managing safety.

Attachment D1, the **QLINE PTASP**, must be approved by the Board of Directors.

Public Transportation Agency Safety Plan

Version 9.0

January 2025

Revision Log

Version No.	Date	Remarks	Authorized Signature
0	September 2019	Original Document	Paul Childs, Accountable Executive
2	January 2020	Revised Document	Paul Childs, Accountable Executive
3	March 2021	General Revision of Document plus **annual review**	Lisa Nuszkowski, Accountable Executive
4	May 2021	Minor revisions	Lisa Nuszkowski, Accountable Executive
4.1	July 2021	Minor revisions	Lisa Nuszkowski, Accountable Executive
5.0	January 2022	Annual Review and minor revisions	Lisa Nuszkowski, Accountable Executive
6.0	December 2022	MDOT recommendations and Infrastructure Investment and Job Act edits	Lisa Nuszkowski, Accountable Executive
7.0	December 2023	MDOT recommendations and Risk-Based Inspection additions	Lisa Nuszkowski, Accountable Executive
8.0	July 2024	RTA Transition and minor revisions	Ben Stupka Accountable Executive
9.0	January 2025	Annual Review and revisions	Ben Stupka Accountable Executive

Transit Agency Information

Agency Name	Regional Transit Authority of Southeast Michigan		
Agency Address	7520 Woodward, Detroit, MI, 48202		
Name and Title of Accountable Executive	Ben Stupka, Executive Director, Regional Transit Authority of Southeastern Michigan		
Name of Chief Safety Officer or SMS Executive	Lyle Dungy, Chief Safety Officer, Regional Transit Authority of Southeastern Michigan		
Mode(s) of Service Covered by This Plan	RAIL	List All FTA Funding Types (e.g.,5307, 5310, 5311)	None

Approvals

The individuals below, submitting and signing this Public Transportation Agency Safety Plan (PTASP), verify it was prepared following the appropriate and applicable requirements and guidelines set forth by the Federal Transit Administration in 49 CFR Parts 670, 673, 674 and others, that they are authorized representatives of the Transit Agency; that their signature attests that all items and conditions contained in this plan are understood, accepted and approved; and that they are committed to implementing the PTASP and achieving its safety goals and objectives.

REVIEWED BY: _____ _____
Chief Safety Officer Date

APPROVED BY: _____ _____
Accountable Executive Date

ACCEPTED BY: _____ _____
State Safety Oversight Manager Date

Revisions/Amendments

Revision No	Revision Date	Revised Sections	Purpose
3	03/04/2021	All	Removed reference to former O&M Contractor, revised roles/responsibilities
4	05/17/2021	All	General revisions
4.1	07/08/2021	2.2.1.3	Removal of reference to SSPP and changed to PTASP
5.0	01/26/2022	All	Annual Review and minor revisions
6.0	12/08/2022	All	Annual Review and minor revisions
7.0	TBD	All	Annual Review and minor revisions
8.0	TBD	All	Transition to RTA and minor revisions
9.0	TBD	All	New definitions and guidance from MDOT

Change Log

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TERMS AND ABBREVIATIONS

1. **Accountable Executive (AE**): Accountable Executive means a single, identifiable individual who has ultimate responsibility for carrying out the PTASP 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 PTASP, per 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan under 49 U.S.C. 5326.
2. **Administrator**: The Federal Transit Administrator or the Administrator's designee
3. **CEL**: Certifiable Elements List
4. **Chief Safety Officer (CSO).** An adequately trained individual who has responsibility for safety and security and reports directly to a transit agency's Accountable Executive
5. **Collision**: Any impact between a rail transit vehicle and any other vehicle, object, or any person
6. **Contractor**: An entity that performs tasks on behalf of FTA, a State Safety Oversight Agency, or RTA through a contract or other agreement
7. **Corrective Action Plan (CAP):** A plan developed by a Rail Transit Agency (RTA) that describes the actions RTA will take to minimize, control, correct, or eliminate risks and hazards and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Rail Transit Agency to develop and carry out a Corrective Action Plan.
8. **Derailment:** Refers to a safety event in which one or more wheels of a rail transit vehicle unintentionally leaves the rails
9. **Disabling Damage:** Damage to a rail transit vehicle resulting from a collision, and preventing the vehicle from operating under its own power
10. **Evacuation for Life Safety Reasons**: Condition that occurs when persons depart from transit vehicles or facilities for life safety reasons, including self-evacuation. A life safety reason may include a situation such as a fire, the presence of smoke or noxious fumes, a fuel leak from any source, an electrical hazard, or other hazard to any person. An evacuation of passengers into the rail right of way (not at a platform or station) for any reason is presumed to be an evacuation for life safety reasons.
11. **Fatality**: Death confirmed within 30 days of a safety event. Fatalities include suicides but do not include deaths in or on transit property that are a result of drug overdose, exposure to the elements, illness, or natural causes.
12. **FTA:** The Federal Transit Administration is an agency within the United States Department of Transportation
13. **Hazard:** Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a rail's fixed guideway public transportation system; or damage to the environment

14. **Hazard Analysis:** The method by which hazards are identified and analyzed to determine their possible effects on the safe operation of the entire system (i.e., Failure Mode and Effect Analysis, Fault Tree Analysis, Stress Analysis, etc.)
15. **Hazard Identification:** formal activities to analyze potential consequences of hazards during operations related to the provisions of service
16. **Hazardous Condition:** An immediate condition that could cause Safety Events involving personal injuries or death
17. **Injury:** Any harm to persons as a result of a safety event that requires immediate medical attention away from the scene. Does not include harm resulting from a drug overdose, exposure to the elements, illness, natural causes, or occupational safety events occurring in administrative buildings
18. **Investigation:** The process of determining the causal and contributing factors of a Safety Events or hazard to prevent recurrence and mitigate risks
19. **MDOT:** Michigan Department of Transportation
20. **National Public Transportation Safety Plan:** The plan to improve the safety of all public transportation systems that receive Federal Financial Assistance under 49 U.S.C. Chapter 53
21. **NTSB:** National Transportation Safety Board, an independent federal agency
22. **Person**: A passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a rail's fixed guideway public transportation system
23. **Public Transportation Agency Safety Plan (PTASP):** It is the comprehensive agency safety plan for a transit agency, including a Rail Transit Agency, required by 49 U.S.C. 5329(d) and based on a Safety Management System. Until one year after the effective date of FTA's PTASP Final Rule, a System Safety Program Plan (SSPP) developed to comply with 49 CFR part 659 will serve as the rail transit agency's safety plan.
24. **Public Transportation Safety Certification Training Program**: Either the certification training program for Federal and State employees or other designated personnel who conduct safety audits and examinations of public transportation systems and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions per 49 U.S.C. 5329(c)(2), or the program authorized by 49 U.S.C. 5329(c)(1)
25. **Rail fixed guideway public transportation system:** Any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration, or any such system at the engineering or construction stage
26. **Rail Transit Agency (RTA):** Any entity that provides services on a fixed-guideway public transportation system
27. **Rail Transit Vehicle:** Any rolling stock used on a rail fixed guideway public transportation system, including but not limited to passenger and maintenance vehicles.

28. **Risk:** The composite of predicted severity and likelihood of the potential effect of a hazard

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

30. **Sabotage**: The deliberate destruction of transit property or the slowing down of public transit operations by employees to damage business or the economic condition of the transit agency

31. **Safety Assurance (SA)**: Ensures that mitigations are implemented, adhered to, appropriate, effective, and sufficiently address the potential consequences of identified hazards.

32. **Safety Certification:** The process used to verify the RTA Streetcar system meets criteria, codes, regulations, and contract requirements as they relate to safety, fire/life safety, and security
33. **Safety Event**: An unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment. A Safety Event must be reported under the notification and reporting threshold outlined in Part 674.

34. **Safety Management Policy**: The written foundation of a public transportation agency's Safety Management System.

35. **Safety Management Systems (SMS**): A method of identifying hazards and controlling risks in the work and operational environment that continually monitors these methods for effectiveness

36. **Safety Manager:** An individual responsible for specific duties under the System Operations General Manager, who supports the Chief Safety Officer (CSO)

37. **Safety Promotion**: Provides visibility of executive management's commitment to safety and fosters improved safety performance by increasing safety awareness through safety communication and training

38. **Safety Risk Management (SRM):** A process for identifying hazards and analyzing, assessing, and mitigating safety risks

39. **Status Operational Codes:** Codes employed to indicate the readiness to operate in a designed and safe condition**.**
    - Code 1: Fully as designed, functional, and safe for revenue service
    - Code 2: Safe to operate in revenue service with some limitations in functionality
    - Code 3: Unsafe to operate, requires focused maintenance efforts

40. **SSOC:** Safety & Security Operations Committee, which is comprised of the Accountable Executive, General Manager, Chief Safety Officer, Operations Manager, Maintenance-of-Way Manager, Fleet Manager, Training Manager, and Safety Manager

41. **State:** The State of Michigan

42. **State Safety Oversight Agency (SSOA):** An agency established by the State of Michigan that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e)

and the regulations outlined in this part

43. **Subsystem**: An element of a system that may constitute a system

44. **System Safety Program Plan (SSPP):** It is a document developed and adopted by the transit agency describing its safety policies, objectives, responsibilities, and procedures. Until one year after the effective date of FTA's PTASP Final Rule, an SSPP developed to comply with 49 CFR part 659 will serve as the rail transit agency's safety plan.

45. **System-Wide Elements**
    - Street Cars
    - Stations
    - Tech Center
    - Overhead Catenary
    - Transit Power Substations
    - Track
    - Switches

46. **System Security Plan (SSP):** A document describing RTA, its security policies, objectives, responsibilities, and procedures
47. **Unintended Train Movement**: Any instance where a revenue vehicle is moving and is not under the control of a driver (whether or not the operator is physically on the vehicle at the time). This applies regardless of whether the event occurred in revenue service.

48. **Vehicle:** Any rolling stock used on a rail's fixed guideway public transportation system, including, but not limited to, passenger and maintenance vehicles owned by RTA

1 Introduction

1.1 System Description

The RTA Streetcar is a modern service designed to fit the neighborhood scale and traffic patterns it travels. The Regional Transit Authority of Southeast Michigan (RTA) is an agency with the mission to manage and secure transportation resources that significantly enhance mobility options, improve quality of life for the residents, and increase economic viability for the region. Streetcar vehicles run in mixed traffic and, except at platform stops, accommodate existing curbside parking and loading. RTA serves a large, urbanized area, the Detroit-Warren-Dearborn, MI Urbanized Area. Detroit, Michigan, had a population of 639,111 in the 2020 U.S. Census.

The streetcar facilities have been constructed and operate within existing street Right-Of-Way (ROW), except for the Penske Tech Center (Vehicle Storage and Maintenance Facility), located at Woodward and Custer at the northern terminus of the line.

A fleet of six vehicles serves the system. The Streetcar service has planned peak headways ranging from 7.5 to 20 minutes. Streetcars stop at the stations on demand and when the vehicle's onboard energy storage system requires charging. System-wide elements and their associated sub-elements include:

- Overhead Catenary (OCS)
- Rail and railway
- Traction power substations (TPSS)
- Signals/Switches equipment
- Stations of passenger stops
- Vehicle Storage and Maintenance Facility, also known as the Roger Penske Tech Center
- Streetcar vehicles

1.2 RTA Safety Performance Measures

According to 49 U.S.C. § 5329(d), the RTA PTASP must include safety performance targets based on the FTA National Safety Plan's safety performance measures. The safety performance measures are:

1. FATALITIES: Total number of reportable fatalities and rate per total Vehicle Revenue Miles (VRM)
2. INJURIES: Total number of reportable injuries and rate per total Vehicle Revenue Miles (VRM)
3. SAFETY EVENTS: Total number of reportable events
4. SAFETY EVENTS RATE: Total number of reportable events and rate per total Vehicle Revenue Miles (VRM)
5. SYSTEM RELIABILITY: Mean distance between major mechanical failures
6. PEDESTRIAN COLLISION RATE: Based on collisions "with a person" as defined by the NTD, divided by Vehicle Revenue Miles (VRM)
7. COLLISION RATE: Collision Rate will be based on collisions as reported to the NTD, divided by Vehicle Revenue Miles (VRM)
8. PEDESTRIAN COLLISION RATE: Pedestrian Collision Rate will be based on collisions with a person as defined by the NTD, divided by SAFETY EVENTS RATE: Total number of reportable events
9. VEHICULAR COLLISION RATE: Vehicular Collision Rate will be based on collisions with

a motor vehicle as defined by the NTD, divided by Vehicle Revenue Miles (VRM)

10. TRANSIT WORKER FATALITY RATE: Transit Worker Fatality Rate is based on transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by Vehicle Revenue Miles (VRM)
11. TRANSIT WORKER INJURY RATE: Transit Worker Injury Rate is based on transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by Vehicle Revenue Miles (VRM)
12. ASSAULTS ON TRANSIT WORKERS: This count is based on assaults on transit workers as defined by the NTD
13. RATE OF ASSAULTS ON TRANSIT WORKERS: This rate is based on assaults on transit workers as defined by the NTD, divided by Vehicle Revenue Miles (VRM)

It is the responsibility of RTA Management to track the performance measures discussed in this section. If the performance measures are not met, it is the responsibility of RTA to use its resources to assess the situation and determine the root cause. Once the root cause has been determined, corrective actions are developed to mitigate the problem after review and approval by the SSOC.

All RTA employees and contractors are responsible for following all rules and procedures established by management to achieve the performance measures set in this document.

RTA will also begin tracking the effectiveness of risk reduction strategies to reduce transit worker assaults after FTA publishes new safety performance target requirements in an updated National Public Transportation Safety Plan, expected in 2023.

RTA coordinates with the Southeast Michigan Council of Governments (SEMCOG), the metropolitan planning organization, in setting regional safety targets annually. RTA and other regional transit providers share their respective safety targets with SEMCOG, which uses this information to analyze trends and establish annual regional safety targets.

1.2.1. Fatalities

Fatality is defined as a death or suicide confirmed within 30 days of a reported event. It does not include deaths in or on transit property resulting from illness or other natural causes.

1.2.2. Injuries

Injuries are defined as damage or harm to persons due to an event requiring immediate medical attention away from the scene.

1.2.3. Safety Events

The safety events measure captures all reported safety events during transit operations and the performance of regular supervisory or maintenance activities.

49 CFR 673.5, as defined by MDOT, describes a Safety Event as:

- A fatality;
- A report of two or more injuries;
- A derailment;

- A collision resulting in one or more injuries;
- A collision between two rail transit vehicles;
- A collision resulting in disabling damage to a rail transit vehicle;
- An evacuation for life safety reasons or;
- An unintended train movement

1.2.4. System Reliability

The system reliability measure expresses the relationship between safety and asset condition. This measures how well a fleet of transit vehicles is maintained and operated. The rate of vehicle failures in service, defined as the mean distance between major mechanical failures, is measured as revenue miles divided by the number of major mechanical failures.

1.2.5. Performance Goal Measures

Performance Measures	2024	2025	2026
FATALITIES	0	0	0
INJURIES	2	2	2
SAFETY EVENTS	42	49	45
SYSTEM RELIABILITY* (Mean Distances Between Failures)	10000	12500	11000
PEDESTRIAN COLLISION RATE	0	0	0
COLLISION RATE	0	0	0
PEDESTRIAN COLLISION RATE	0	0	0
VEHICULAR COLLISION RATE	0.0002	0.0002	0.0002

TRANSIT WORKER FATALITY RATE	0	0	0
TRANSIT WORKER INJURY RATE	0.000009	0.000009	0.000009
ASSAULTS ON TRANSIT WORKERS	2	2	2
RATE OF ASSAULTS ON TRANSIT WORKERS	0.00001	0.00001	0.00001

- RTA used the total VRM in 2024
- System reliability is measured against the seven System-Wide Elements. When any one of the elements or a combination falls beneath a Code 2 status (Status Operational Code) and disrupts scheduled service for 1 hour or more, a **Failure** has occurred.
- Code 1 - Equipment is fully operational and meets all design conditions
- Code 2 - Equipment is safe to operate with limitations, as noted
- Code 3 - Equipment is unsafe to operate

These performance measures are based on the statistical data from May 2017 to March 2019 and the annualized vehicle revenue service miles.

The collision rate is based on collisions reported to the NTD divided by Vehicle Revenue Miles.

1.3 Emergency Preparedness and Response

1.3.1 Assignments

The following personnel have the enumerated emergency preparedness and response responsibilities:

Emergency Preparedness Tasks	Executive Director/ AE	General Manager	EMPSL	Chief Safety Officer	Safety Manager	Operations Manager	Maintenance-of-Way Manager/	HR	PIO	CFO	Frequency*

							Fleet Manager				
Interagency Coordination	A	AW	P	S	S	S	S				D
Security Training	AW	S	P	S	S	S	S	S			AR
Facility Inspections	AW	R	S	P	S	S	S				MD
Equipment Inspections	AW	R	S	P	S	S	S				D
Emergency Response Procedures	A	R	P	S	S	S	S	S			AR
Operational Documents	AW	P	R	S	S	S	S				Y
Public Awareness	A	R	A			S	S	S	P		AR
First Responder Training and Drills	AW	R	P	S	S	S	S	S			Y
External Audit Response	A	RE	S	RE	RE	S	S		S	S	Y
Cyber Security	A	AW	P	S	S	S	S				Q
Corrective Action Plan	A	RE	S	P	S	S	S	S			AR

EMERGENCY PREPAREDNESS AND RESPONSE MATRIX

RTA has developed a Continuity of Operations Plan (COOP), which formalizes our emergency preparedness and response plans. Additionally, the Accountable Executive controls and directs the human and capital resources needed to develop and maintain the PTASP and SMS.

Please see the RTA Continuity of Operations for the assignment of employee responsibilities during an emergency and coordination with Federal, State, and Local officials.

Tasks are identified below. Also identified are the organizational/participant responsibilities for each task, as designated by the following code:

P - Primary Task Responsibility: The identified participant(s) is (are) responsible for preparing the specified documentation.

S - Secondary or Support Responsibility: The identified participant(s) is (are) to provide the necessary support to accomplish and document the task if warranted.

R - Review/Comment Responsibility: The identified participant(s) is (are) to review and comment on the task or requirement.

A - Approval Responsibility: The identified participant(s) is (are) to review, comment, and subsequently approve the task or requirement.

AW - Awareness of Activity: The identified participant(s) is (are) aware of the activity.

RE - Recommend Approval. The identified participant is recommending approval to the executive in charge.

*Frequency: Daily (D); Monthly (M); Quarterly (Q); Yearly (Y); As Required (AR)

2 Safety Management Policy

2.1 Safety Management Policy Statement

The Regional Transit Authority of Southeast Michigan (RTA) owns and operates the QLINE Streetcar System. As such, the RTA safety objectives are to provide safe, secure, and efficient transportation services by creating a collective awareness, understanding, involvement, and commitment among RTA employees, contractors, and other resources along the operating corridor to ensure the safety of passengers, employees, property, and the public in the QLINE service area.

Specific accountability for safety performance rests with those managing each function or location. All employees and contractors are responsible for understanding and implementing this policy to the best of their ability. The Accountable Executive is ultimately accountable for the overall safety of the system.

Performance Measures Per every 100,000 (Vehicle Revenue Miles)	Accountabilities and Responsibilities
FATALITIES	Accountable Executive
INJURIES	Executive Director, CSO, Contractors, General Manager, Managers, and All Employees
SAFETY EVENTS	Executive Director, CSO, Contractors, General Manager, Managers, and All Employees
SYSTEM RELIABILITY (Mean Distance Between Failures)	Executive Director, Contractors, General Manager, and All Managers

The CSO, under the direction of the Accountable Executive, is tasked to devise, implement, and administer a comprehensive, integrated, and coordinated Public Transit Agency Safety Plan (PTASP), which identifies activities to prevent, eliminate, control, or reduce hazards (unsafe acts or conditions) that may occur during the design, construction, or operational stages of any system under the jurisdiction of the RTA.

The Safety Manager is responsible for safety compliance, as well as verifying and assessing daily operations from a safety-centric perspective. The Safety Manager, as the CSO does, has the authority to stop any work or process if it represents and imminent hazard.

RTA Management will review safety program effectiveness and provide resources needed to correct deficiencies. The RTA will work with the Michigan Department of Transportation and other safety oversight agencies to achieve the safest and highest quality system possible.

This policy will be communicated throughout the organization. Please see Section 1.2.4 for the RTA Safety Objectives.

_____ _____

Ben Stupka Date
Executive Director and Accountable Executive
Regional Transit Authority of Southeast Michigan

2.2 Safety Accountability and Responsibility

2.2.1 RTA Positions

2.2.1.1 Accountable Executive/Executive Director

The Accountable Executive (AE) serves as the executive vested with primary responsibility for RTA's safety and security activities and overall adherence to the safety and security program. The duties of the AE include but are not limited to:

- Ensuring action is taken, as necessary, to address substandard performance in the RTA SMS Program
- Signing the RTA SMS PTASP and subsequent updates
- Ensuring that RTA SMS is effectively implemented throughout the agency's public transportation system
- Delegating specific responsibilities while maintaining ultimate accountability for the transit agency's safety and security performance
- Designating a Chief Safety Officer or SMS Executive
- Ensuring a process is established to assess RTA's safety performance
- Assumes ultimate responsibility for carrying out the RTA Agency Safety Plan and Safety Management System.
- Maintaining and carrying out the Agency's Transit Asset Management Plan (TAM).
- Direct and coordinate all operational personnel by establishing and monitoring program and project objectives
- Implement programs in direct support of the System Reliability Measure
- Manage the General Manager and administer all contractual needs
- Assure all safety and security procedures and processes are followed by the resources reporting to that position
- Allocate resources to the CSO on an as-needed basis for Safety and Security requirements
- Hold all RTA employees, contractors, and subcontractors' employees accountable for the safety and security performance of the RTA Streetcar System

2.2.1.2 Chief Safety Officer/Emergency Management and Public Safety Liaison

The above position has significant roles supporting both safety and security. The following FTA-endorsed programs fall under the jurisdiction of the Accountable Executive and this position:

- PTASP
- SMS
- SSEPP
- Emergency Preparedness Plan
    - Emergency Management
    - Disaster Recovery (Continuity of Operations Plan)

The Chief Safety Officer role is responsible for overseeing and implementing the RTA PTASP. Reporting directly to the Accountable Executive, this position is responsible for developing and implementing the PTASP as established in 49 CFR 673 and 674. Additionally, the CSO serves as the Chair of the Safety and Security Operations Committee. The Chief Safety Officer will not act in any other operational or maintenance capacity. However, because of the significant

connection between safety and security, the added supporting role of the Safety Manager, and the limited size and budget of RTA and its unique structure, the functions have been merged into a single organizational position. However, no other Operational or Maintenance role is included or inferred.

Among the duties the Chief Safety Officer is responsible for:

- Coordinating the development and implementation of the RTA PTASP.
- Coordination of Internal and External PTASP Audits.
- Reviews and updates the PTASP under 49 CFR 674.
- Identifying substandard performance in RTA's SMS and developing action plans for approval of the Accountable Executive.
- Provides Safety Risk Management (SRM) expertise and support for other RTA personnel who conduct and oversee Safety Assurance activities.
- Has primary responsibility for conducting Hazard Risk Analysis and reviewing proposed risk ratings for new safety hazards
- Monitor various safety logs:
    - Hazard
    - Corrective Action Plan
    - Safety Events
    - Unusual Occurrences
    - Blockage

The RTA Emergency Management & Public Safety Liaison (EMPSL) has the following responsibilities:

- Coordinating emergency response planning and drills among Detroit law enforcement and other first responder groups. These include, but are not limited to, the US Department of Homeland Security, Detroit Police and Fire departments, private security organizations (i.e., Project Lighthouse), emergency medical units, public health resources, and other police units, including State, MDOT, Wayne State Police Department, and contracted security.
- Overseeing the development of the Continuity of Operations Plan (Disaster Recovery and Emergency Operations)
- The EMPSL serves as the RTA liaison to the Detroit Emergency Operations Center (EOC) whenever activated due to an event involving or affecting RTA service or property.
- The EMPSL will develop procedures in an SOP to determine when assistance from contracted security or another emergency service is necessary.
- The EMPSL participates in:
    - Local law enforcement/private security meetings on crime trend analysis
    - Development of crime analysis reports being utilized internally for proactive security awareness
- EMPSL will regularly meet all parties along the Streetcar corridor. The primary interaction will be via the Downtown Detroit Safety and Security Monthly meeting sponsored by the Downtown Detroit Partnership and the Midtown CompStat Meeting.
- Bi-annually, the Emergency Management & Safety Liaison or designee will coordinate, conduct, or participate in safety/security-related drills and exercises with the City of Detroit, Department of Homeland Security, and other agencies, such as Detroit Fire and Detroit Police Department. RTA participation aims to ensure all potential emergency responders

are familiar with RTA equipment and property. Participation may include hands-on training, demonstrations, video demonstrations, handouts, or other media. At a minimum, emergency responder training will consist of familiarization with streetcar vehicle and system electrification, streetcar operations and routing, and emergency entry methods into streetcar vehicles. RTA contractors will participate in all drills and exercises as needed.

- The EMPSL will oversee the implementation of findings approved by the SSOC from emergency drills and exercises and ensure appropriate and timely employee training occurs, as necessary. After action, reports are developed following emergency drills and exercises, which will be transmitted to the SSO. Furthermore, annual recertification will incorporate discussion and refresher training regarding procedures, practices, actions, and responsibilities to ensure RTA personnel are trained to perform satisfactorily during emergencies.
- Training for employees and local public safety organizations and more extensive discussion is contained in the SSEPP.
- Directing/overseeing the security program in coordination with Homeland Security, State, and Local Law Enforcement.
- Serve as the point of contact between the SSOA, Law Enforcement, and RTA

2.2.1.3 Safety and Security Operations Committee

The CSO is the Chair of this committee. The CSO acts as a resource for the operations, maintenance, and administrative staff and administers the PTASP, with management assistance as required. The SSOC, among its responsibilities, will facilitate the incorporation of the PTASP into all aspects of RTA's operations and services.

The SSOC has the authority and responsibility to:

- Perform Safety Events investigation for preventability on behalf of RTA and MDOT when requested
- Ensure all significant Safety Events, hazards, and internal safety issues are reviewed and resolved
- Oversee internal safety reviews and inspections
- Report unacceptable hazardous conditions to RTA's executive management (Executive Director) as soon as possible
- Work with operations and maintenance staff to ensure all Safety Management Systems Program requirements are implemented and program goals and objectives are achieved
- Oversee the development, management, and reporting of Corrective Action Plans (CAP) that result from Safety Events investigations, hazard analyses, and safety reviews and audits, and track corrective actions through fruition to ensure all identified deficiencies are adequately eliminated or controlled
- Ensure the appropriate management and the AE are immediately notified of hazards of imminent danger or as other problems are identified or arise
- Ensure recommendations are followed and corrected by the implementing party
- Review findings and comprehensive reports and monitor the implementation of any corrective action plan
- Review, approve, or recommend changes to the reports and corrective action plans prepared by the Committee for safety hazards and threat and vulnerabilities audit findings and corrective actions before submittal of the final reports to the responsible parties for implementation

- Review, approve, or recommend changes to corrective action plans developed in response to recommendations of the MDOT Office of Rail and other regulatory agencies
- Review, approve, or recommend changes to the annual reports of the internal safety/security review audit required for submission to the MDOT Office of Rail
- Review, approve, or recommend changes to RTA safety rules and procedures established to implement the requirements and programs defined in the PTASP
- Hold scheduled or unscheduled SSOC meetings
- Review proposed risk ratings for new safety hazards
- Identifies safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program, as outlined in 49 CFR §§ 673.19(d)(3)(ii) and 673.27(b)(2).
- Reviews the recommendations of and coordinates with the JLMSC.

2.2.1.4 General Manager

The General Manager is the direct point of contact for the RTA Streetcar system's day-to-day management. The duties assigned to this position are:

- Coordinate the organization, staffing, and operational activities for the streetcar
- Develop and implement goals, objectives, policies, and priorities; recommend and implement resulting policies and procedures; ensure customer satisfaction through efficient and effective delivery of streetcar services
- Establish schedules and recommend methods for providing streetcar service, including overseeing and reviewing timelines and schedules, identifying resource needs, and allocating resources appropriately
- Direct, coordinate, and review the work plan for streetcar operations and activities; assign work activities and projects; monitor workflow; review and evaluate work products, methods, and procedures; work with staff to identify and resolve problems
- Oversee streetcar operations and ensure workforce compliance with all related safety rules, regulations, and procedures, as well as ensure that hazards and risks are reported and mitigated as required.
- Maintain and provide documentation for audits and inspections conducted by federal and state agencies
- Oversee compliance with the State of Michigan motor vehicle licensing and testing requirements and ensure that testing complies with applicable rules, regulations, and mandates
- Supervise and assist in the preparation of technical specifications for equipment procurement
- Manages the contracting, contract administration, and contract monitoring processes, including developing
- Maintain and provide documentation for audits and inspections conducted by federal and state agencies
- Oversee compliance with the State of Michigan motor vehicle licensing and testing requirements and ensure that testing complies with applicable rules, regulations, and mandates

- Supervise and assist in the preparation of technical specifications for equipment procurement
- Manages the contracting, contract administration, and contract monitoring processes, including developing bid and proposal packages for annual contract services
- Review and evaluate proposed construction projects and plans; identify impact on streetcar operations; recommend and implement solutions
- Develop operational goals, performance indicators, and related performance measures and the strategic plans to achieve them
- Select, train, coach, motivate, and evaluate streetcar personnel; provide or coordinate staff training; work with employees to improve performance and perform human resources duties related to employee handbook policies
- Assist in managing employee and labor relations with the Labor Relations and Training Director; participate in the resolution of differences between management and labor
- Participate in the development and administration of a multi-million-dollar operating budget; forecast funds needed for staffing, equipment, material, and supplies; monitor and approve expenditures; recommend adjustments as necessary
- Assure post-Safety Events Drug and Alcohol policies are followed
- Assist in maintaining and carrying out the Agency's Transit Asset Management Plan (TAM)
- Perform related duties as required

2.2.1.5 Maintenance-of-Way Manager

Under the supervision of the General Manager, the RTA Maintenance Manager has, among other duties, the following safety and security responsibilities:

- Coordination of responsibilities for all maintenance personnel and contractors as required for the safe and efficient operation of the Streetcar
- Establishes the Status Operational Condition Code daily for each sub-system
- Monitors and documents preventive maintenance (PM) programs for all rail equipment
- Inspects work in progress, assuring performance is as specified and safely implemented, ensuring the timely quality of completion of work orders
- Coordination of required workload demands and allocation of critical resources under the direct control of this position
- Development and implementation of processes and procedures within the Streetcar maintenance division to ensure the safe and efficient operation of all streetcars, maintenance support equipment, and streetcar facility equipment
- Implementation of Rail Transit System maintenance and management programs, industrial hazard identification, Safety Events and security notification, internal maintenance and safety audits, emergency preparedness, and response
- Regulatory compliance and implementation of training materials in coordination with the RTA Safety Manager and CSO
- Development and execution of comprehensive maintenance plans to consistently improve safety performance across all areas of the RTA and the associated track and power equipment
- Assure safe work methods and communications with personnel to make sure they are

notified about new and modified maintenance methods consistent with OEM procedures and policies
- Ensure maintenance personnel are trained, and safety policies and procedures are continuously reviewed
- Hold all maintenance employees, contractors' employees, and subcontractors' employees accountable for following all safety requirements of the RTA Streetcar
- Ensure all employees and subcontractors communicate safety issues, collect data on safety performance, and communicate safety issues to employees
- Support all regulatory or policy-required audit activities, including implementation of Corrective Action Plans
- Assign the appropriate Status Operational Codes to the specific System-Wide Elements daily and support budget reporting and development
- Operation and data integrity of the work order system, accurate inventory accounting, and other maintenance reporting and data acquisition reports
- Act as lead for QA/compliance for contractor maintenance/repair of safety-critical wayside equipment

2.2.1.6 Operations Manager

Under the supervision of the General Manager, the Operations Manager has, among others, the following responsibilities:

- Publish and revise the Daily Train Orders indicating the Operational Condition of the key sub-system components
- Oversee and perform the planning, organizing, coordinating, and directing transit on fixed route or streetcar operations through supervisors, ensuring timely, efficient, and safe customer service
- Provide guidance and direction to supervisors in route and shift coverage to ensure timeliness of service, customer satisfaction, and compliance with safety and security requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements
- Monitor daily operations, meet with route supervisors on service-related issues, such as road closures or special assignments; maintain and analyze complaint files for service improvement
- Assures compliance with all work rules and SOPs and implementation of rail transit system operations and response
- Regulatory compliance and implementation of training materials in coordination with the RTA Safety Manager and CSO
- Oversee and monitor streetcar operations to ensure enough staffing to facilitate passengers' safe and orderly movement per the required service levels.
- Investigate, document, and safety and security reports to the RTA CSO and Safety Manager
- Ensure Safety Events are appropriately investigated and correctly documented
- Assure all operating personnel are fully trained and qualified for their role to ensure safe and secure operational performance
- Actively promote the observation of safe work practices
- Respond to Safety Events, or emergencies to ensure proper investigation
- Ensure all employees and subcontractors communicate safety and security issues, collect data on safety performance, and communicate safety and security issues to employees
- Holding all operations employees and any subcontractors' employees accountable for the safety performance of the RTA Streetcar

- Support all regulatory or policy-required audit activities, including implementation of Corrective Action Plans
- Responsible for the operation and data integrity of the work order system, accurate inventory accounting, and other operations reporting and data acquisition reports.
- Support budget reporting and development

2.2.1.7 Fleet Manager

The Fleet Manager oversees RTA's fleet of Brookville Liberty Streetcars. The Fleet Manager ensures the streetcar vehicles are well-maintained, safe, clean, and available for passenger service. This person serves as a subject matter expert and is expected to lead a team of Streetcar Maintenance Technicians while cultivating a professional and positive work environment for the team. In this role, the Fleet Manager will advocate for the RTA safety culture that aims to continuously improve the safety and well-being of all employees and contractors and will implement and execute required safety programs.

Under the supervision of the General Manager, the Fleet Manager is responsible for the management and oversight of streetcar maintenance and mechanical and electrical engineering programs, systems, and activities related to the maintenance, modification, and improvement of streetcar equipment, whether by in-house or contract staff; designs and implements quality assurance and quality control programs and provides highly responsible and complex technical engineering project management. Additionally, the Fleet Manager will be part of the leadership team and be called upon to coordinate with and provide insight and recommendations on all fleet and maintenance activities.

The Fleet Manager has, among others, the following duties:

- Supervises, coaches, and manages all streetcar maintenance technicians
- Oversees contractors that may be used to assist with streetcar repair
- Ensures that all streetcars and related equipment are maintained following manufacturers' recommended specifications
- Leads the streetcar condition assessment for the Transit Asset Management Plan and
- implements plan recommendations
- Ensures all reports and forms associated with streetcar inspections and repairs are
- completed and logged, and that car books are kept current
- Operates streetcars on an as-needed basis
- Provides QA/QC for the streetcar maintenance activities
- Assists with the creation of maintenance Standard Operating Procedures (SOPs)
- Helps create and provides training as needed to employees on streetcar equipment
- May serve as the Employee in Charge (EIC)
- Performs hazard analysis for streetcars and related equipment
- Supports Safety Events investigations and is a lead in all those that involve a streetcar
- Resolves streetcar maintenance hazards by developing Corrective Action Plans (CAPs) with the support of the General Manager and Chief Safety Officer
- Provides weekly, monthly, and annual maintenance reports to the General Manager
- Assists in the development of the 5-year maintenance plan

- Responsible for streetcar parts inventory, ensuring inventory control procedures are met, and part inventory levels are maintained
- On occasion, performs maintenance on vehicles and equipment
- Oversees all streetcar warranties for parts and equipment
- All other duties as assigned

2.2.1.8 Safety Manager

RTA Safety compliance falls under the responsibility of the Safety Manager. Under the General Manager's supervision, the Safety Manager verifies and assesses the daily operations of the RTA from a safety-centric perspective. The Safety Manager, as the CSO does, has the authority to stop any work or process if it represents an imminent hazard:

The Safety Manager has, among others, the following duties:

- Assist in Safety Events investigation, including collection, organizing, and recording of data
- Ensure compliance with State and Federals regulations regarding transportation and workplace safety
- Assist in the resolution of all “Good Faith Safety Challenges” unresolvable by front-line management
- Assist in the investigation of safety breaches
- Conduct unannounced, random inspections
- Provide safety training as needed
- Participate in threat and vulnerability assessments
- Complies with all SOPs
- Chair Joint Labor-Management Safety Committee
- Assure all CSO data requests are performed in a timely fashion
- Direct/oversee the overall safety operations of job sites and on-board systems that include reporting and conducting safety meetings
- Support the development and implementation of training programs (i.e., new streetcar operator, safety policy courses, passenger/assistance service sensitivity classes, etc.)
- Review Safety training curriculum and requirements for all contractors
- Monitor contents of classroom training to ensure safety compliance;
- Assist in the investigation of Safety Events, hazardous conditions, and work-related injuries
- Plan, schedule, and conduct monthly safety meetings based on RTA safety and security training goals and objectives
- Address safety complaints
- Support the development and maintenance of the Operational Hazard Analysis Log;
- Assist the Chief Safety Officer with Corrective Action Plans (CAPs) implementation and follow-up
- Support all regulatory or policy-required audit activities, including implementation of Corrective Action Plans
- Designated Employer Representative for the Drug and Alcohol Program
- Perform monthly and annual safety inspections and audits
- Provide Track Access training classes to contractors and monitor/observe work on the alignment

2.2.1.9 Training Manager

Under the supervision of the General Manager, the Training Manager has, among others, the following responsibilities:

- Review existing training programs; suggest enhancements and modifications to improve engagement, learning, and retention and to meet the changing needs of clientele, the organization, or the industry
- Ensures that training materials and programs are current, accurate, and effective
- Maintains knowledge of new methods and techniques for training and training requirements applicable to the organization or industry
- Identifies problems and opportunities, such as operational changes or industry developments, that training could improve
- Conducts or facilitates required and recommended training sessions
- Collaborates with vendors and third-party training providers to arrange employee registration for and participation in outside training programs
- Ensures that training milestones and goals are met while adhering to the approved training budget
- Prepares and implements training budget
- Organizes and updates employee training files
- Ensures all training records are accurate
- Updates and maintains the Training Matrix
- Documents any employee retraining
- Ensuring all staff are adequately trained in compliance with FTA and MDOT regulations, policies, and procedures

2.2.1.10 Joint Labor-Management Safety Committee

RTA has established a Joint Labor-Management Safety Committee (JLMSC). The JLMSC has been convened by a joint labor-management process, has an equal number of labor and management representatives, and is responsible for the following:

- Review and approve the transit agency's Public Transportation Agency Safety Plan (PTASP) and any subsequent updates — § 673.19(d)(1); cross-referenced in § 673.11(a)(1)(i)
- Set the annual safety-performance targets for the Safety Risk Reduction Program — § 673.19(d)(2); cross-referenced in § 673.11(a)(7)(iii)
- Identify and recommend safety-risk mitigations needed to lower the likelihood or severity of hazards (including when the agency misses a target) — § 673.19(d)(3)(i) and § 673.25(d)(5)
- Flag safety-risk mitigations that are ineffective, inappropriate, or not implemented as intended — § 673.19(d)(3)(ii)
- Identify safety deficiencies for continuous improvement under the agency's Safety Assurance process — § 673.19(d)(3)(iii) and § 673.27(d)(1)(ii)
- Define and document the Committee's organizational structure, size, composition, and chairing arrangements — § 673.19(c)(1)
- Develop and circulate meeting agendas/notices and record & maintain meeting minutes — § 673.19(c)(2)
- Ensure Committee members receive required training on the PTASP, SMS processes, and supporting tools — § 673.19(c)(3)
- Apply the agency's compensation policy for member participation in Committee meetings — § 673.19(c)(4)
- Access technical experts, agency data/resources, and transit-worker safety-reporting

submissions to support deliberations — § 673.19(c)(5)
- Establish a decision-making method and formally record Committee decisions — § 673.19(c)(6)
- Coordinate and communicate Committee actions with the Board of Directors (or equivalent) and the Accountable Executive — § 673.19(c)(7)
- Use an agreed-upon dispute-resolution or arbitration process to manage internal Committee disputes — § 673.19(c)(8)
- When addressing vehicular or pedestrian safety events, evaluate mitigations that reduce operator-visibility impairments (e.g., vehicle retrofits, procurement specifications) — § 673.25(d)(3)
- When addressing assaults on transit workers, consider deploying assault-mitigation infrastructure and technology (e.g., operator barriers) — § 673.25(d)(4)

2.2.1.11 Chief Financial Officer

Manages the support of critical business functions affected by an emergency and the recovery of data systems and telecommunications to all facilities. Serves as a member of the RTA Emergency Response and Recovery Team.

For more information, see the RTA Continuity of Operations Plan dated August 8, 2024.

2.2.1.12 Communications/Outreach

Manages outreach to all stakeholders and is the media representative during an emergency. See the RTA Continuity of Operations Plan dated August 8, 2024 for more information.

2.2.1.13 Engineering Support/Planning

Serves as the Cybersecurity Coordinator and is responsible for maintaining and carrying out the cybersecurity policy of RTA.

For more information, see SOP 225 Cybersecurity, dated 04/18/2024.

2.3 Documentation and Record-Keeping

All safety activities on RTA are formally documented. The type of document used will vary depending on the kind of activity. The following is a list of activities and the type of form that may be used to document it:

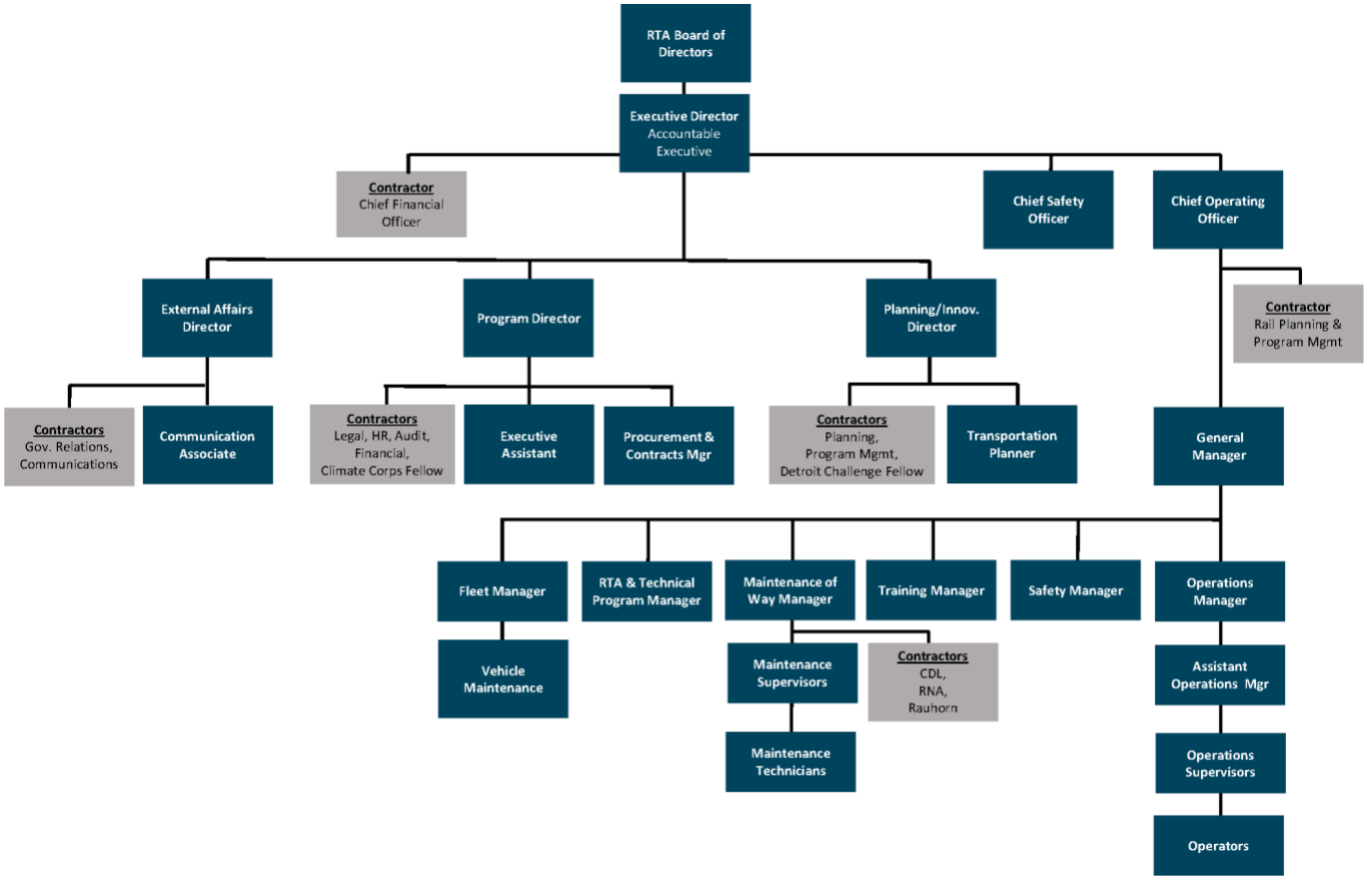
Activity	Type of Document
Inspections	• Checklist • Photos • Evidence that the finding has been corrected • Summary assessment
Audits	• Notification letters • Audit Checklist • Audit report with supportive documentation • Corrective Actions generated by the audit
Safety Meetings	• Agenda • Attendance Sheet

Training	• Agenda • Attendance sheet • Training material

RTA uses a Cloud-based commercial storage service (SharePoint). All official documentation generated for Safety and Security purposes must be stored in this cloud-based repository. Examples of safety and security documents stored are audit reports, CAP Log, Hazard Log, and any other documents RTA determines that need to be kept.

Documents generated in hard copy, such as work orders, pre-trip inspections, etc., will be kept on record by the department manager. Those documents must be organized in a location that prevents deterioration and keeps them secure. The department will establish and maintain a rolling documentation index and subdivide it to promote rapid recovery. Those index schemes will be reviewed and approved by the SSOC.

Official documents must be kept for no less than three calendar years, including all SMS documents. MDOT, FTA, and any other entity with regulatory oversight can access the RTA documents.


RTA Board of Directors
Executive Director
Accountable Executive
Contractor
Chief Financial Officer
Chief Safety Officer
Chief Operating Officer
External Affairs Director
Program Director
Planning/Innov. Director
Contractor
Rail Planning & Program Mgmt
Contractors
Gov. Relations, Communications
Communication Associate
Contractors
Legal, HR, Audit, Financial, Climate Corps Fellow
Executive Assistant
Procurement & Contracts Mgr
Contractors
Planning, Program Mgmt, Detroit Challenge Fellow
Transportation Planner
General Manager
Fleet Manager
RTA & Technical Program Manager
Maintenance of Way Manager
Training Manager
Safety Manager
Operations Manager
Vehicle Maintenance
Maintenance Supervisors
Contractors
CDL, RNA, Rauhorn
Assistant Operations Mgr
Maintenance Technicians
Operations Supervisors
Operators

3 Safety Risk Management

The objective is to identify hazardous conditions, both physical and task performance-related, document them, develop and apply mitigation strategies, and assess whether the mitigations have eliminated or minimized them to an acceptable risk status.

RTA defines a hazard as any real or potential condition that can cause injury, illness, or death; damage or loss of the facilities, equipment, rolling stock, or infrastructure of a rail fixed guideway public transportation system; or damage to the environment. The Chief Safety Officer is directly responsible for the implementation and ongoing management of the RTA Safety risk management process, which includes:

- Developing, updating, and overseeing the auditing of the program;
- Training all designated RTA employees and contractors on the safety risk management process and
- Documenting and tracking all identified hazards up to resolution.

The hazard resolution process is from ‘cradle to grave’ and can be applied throughout the 5 phases of the system life cycle, which are:

1. Planning
2. Design
3. Construction
4. Operations
5. Decommissioning

Hazard analysis attempts to determine the primary events in the hazard generation process. Upon identifying these events, RTA will undertake measures to mitigate, control, or eliminate the generation of hazards to reduce their risk to an acceptable level. Hazard resolution is the corrective action taken in response to the hazard identification and assessment process. Time and resource restrictions may determine the level of resolution that can be accomplished.

The following are actions addressed in hazard resolution:

- Eliminate the hazard, if possible
- Implement training, procedural strategies, or technology approaches, as appropriate, to reduce the hazard
- Provide training to educate the workforce on possible hazards
- If the hazard cannot be eliminated, reduce exposure to it

Monitor the Hazard Mitigation to determine if the risk has been managed to an acceptable level. Refer to SOP 305, entitled “Hazard Management Plan,” for details.

3.1 Safety Hazard Identification

Identifying hazards is the responsibility of all departments and is the key to system safety. Safety hazard identification encompasses a set of methodologies that first search throughout the system for anything with potential physical and occupational harm. The RTA Chief Safety Officer shall review all identified risks. Identified risks are analyzed for severity, occurrence frequency, and cost feasibility of remedial action required to eliminate or reduce the hazard to the lowest practical level.

Hazards can be identified in several ways, such as:

- Design Review
- Safety Events, System Reliability, and Failure Reports
- Ride Checks and Proficiency Checks
- System Inspections
- Internal, FTA, or MDOT Audits and Regulatory Inspections
- Customer, Contractor, and Employee Complaints
- Safety Committee
- Transit Industry Experience
- Employee Safety Reporting
- Occupational task review

The Accountable Executive allocates the resources necessary to mitigate safety and security hazards. RTA will use a hazard identification and analysis process before purchasing and accepting new equipment and modifying existing facilities, systems, rolling stock, and infrastructure elements. The SSOC will review and approve these modifications before implementation.

Existing mitigations can be found in the QLine Safety Risk Management Log. For more details, refer to RTA SOP 305 Hazard Management Plan.

3.1.1 Hazard Analysis Methods

Hazard analysis is based on the probability of occurrence and the severity of an event. Hazards with the highest potential to cause serious injury will be given the highest priority for immediate resolution. Hazard analysis also attempts to reduce the severity of Safety Events by introducing protective devices and equipment, procedures or forms, or system modifications that reduce the amount of human and property damage in the event of a Safety Event.

While identifying every hazard is impossible, there are two methods to identify risks: inductive and deductive analysis.

- **The inductive hazard** identification process analyzes system components to identify their respective failure modes and effects on the system. This process assumes the failure of single elements or events and, through analysis, determines the potential consequential impact on the system or subsystem.
- **The deductive hazard** identification process involves defining an undesired effect (e.g., collision, fire) and then deducing the possible conditions or system component faults (or combinations) necessary to cause it.

The RTA Chief Safety Officer, supported by the Safety Manager, will continuously evaluate activity using the above methods to identify new hazards documented in this document.

3.2 Hazard Assessment

Hazard Risk Assessment is a semi-quantitative calculation based on mostly subjective judgments used to determine the risk associated with each hazard and, thus, the urgency for implementing corrective measures to eliminate or reduce risks to an acceptable level. Risk Assessment is comprised of evaluating hazard severity (categorizing the hazard) and estimating hazard probability. The factors considered in this analysis include system safety, schedule, and the impact on the public's perception of the system's safety in the community where the trains operate.

3.2.1 Hazard Severity

Hazard severity is a subjective determination. As data is accumulated over time, an objective decision applicable specifically to RTA can be derived. The finding reflects a credible mishap that could be anticipated to result from human error, procedural deficiencies, design inadequacies, component failure, or malfunction. Hazard Severity at RTA is based on the U.S. Department of Defense Military Standard for Systems Engineering (MIL-STD-882-E) as follows:

Table 1: Definition of Severity

SEVERITY CATEGORIES		
Description	**Severity Category**	**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 M.
Critical	**2**	Could result in one or more of the following: Permanent or 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 M but less than $10 M.
Marginal	**3**	Could result in one or more of the following: Injury or occupational illness resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding $100 K but less than $1 M.
Negligible	**4**	Could result in one or more of the following: Injury or occupational illness not resulting in a lost workday, minimal environmental impact, or monetary loss less than $100 K.

Hazard categorization is consistent with risk-based severity criteria; it reflects the principle that not all hazards pose an equal amount of risk to personal or system safety.

During hazard analyses, RTA will identify Category 1 Catastrophic and Category 2 Critical hazards. MDOT will be immediately notified of the risks. These issues will be monitored using the Hazard and CAP logs.

3.2.2 Hazard Probability

The probability of an event or hazard occurring may be defined as a ratio of the number of times a specific event happens to the total number of trials. This event may occur during the planned life expectancy of a system. Generally, hazard probability is described qualitatively in potential occurrences per unit of time, miles, trips/runs, or passengers carried. A hazard probability may be derived from analyzing transit system operating experience, evaluation of RTA safety data, or historical safety data from other passenger rail systems. Table 2 identifies the probability thresholds used by RTA for hazard assessment.

Table 2: Definition of Exposure

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 that 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

Table 3: Risk Assessment Value

RISK ASSESSMENT MATRIX				
SEVERITY PROBABILITY	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (F)	Eliminated			

3.3 Hazard Mitigation

The resolution of hazards utilizes the output of the Risk Assessment Process. The objectives of the hazard resolution process are to:

- Identify areas where hazard resolution requires changing the system design, installing safety devices, or developing special procedures.
- Verify that hazards involving interfaces between two or more systems have been resolved and
- Verifying the resolution of a hazard in one system does not create a new risk in another system.
- 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.

RTA will use the following methodologies to eliminate, mitigate, or control hazards and meet system safety and security objectives.

These controls are implemented throughout design, construction, procurement, and operations:

- Design out hazards or design to minimize hazard severity to the extent permitted by cost and practicality. Identified risks are eliminated or controlled by the equipment, systems,

and facilities design.

- Develop mitigating provisions for hazards that cannot reasonably be eliminated or controlled through design to an acceptable level using fixed, automatic, or other protective safety design features or devices. Provisions are made for a periodic performance of functional checks of safety devices and employees' training to meet system safety objectives.
- When design, training, or safety devices cannot reasonably or effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons to the risk.
- Where it is impossible to reasonably eliminate or adequately control a hazard through design, safety, and warning devices, procedures, and training are used to manage the risk. Cautionary notations are standardized for all persons involved, and safety-critical issues will require authorized personnel certification.

The Initial Risk Index defines the magnitude of any specific hazard item without implementing a design, construction, procurement, or operational measure to control or mitigate the risk.

The review process of the mitigating action consists of the following:

- The CSO or any other manager/personnel will identify proposed mitigation actions to eliminate or control each identified risk and submit them to the CSO.
- The CSO will evaluate the proposed mitigating actions.
- The CSO will convene the SSOC to evaluate the mitigating action.
- If the SSOC approves the mitigating action (a majority of votes), the CSO will inform RE of the determination of whether the hazard is adequately controlled or mitigated.
- The CSO will evaluate the Residual Risk Index based on those mitigating actions to assess its potential effectiveness.
- The mitigating action will be submitted to MDOT.
- If the mitigation proves unsuccessful, the CSO will reconvene the SSOC to review the unsuccessful mitigation and facilitate the development of an alternate mitigation method.

3.4 Coordination with the Michigan Department of Transportation (MDOT)

To ensure an ongoing role in the oversight of RTA's safety risk management process, RTA will establish a Hazard Tracking Log, reflecting the consolidation of information in the safety risk management process. The Hazard Tracking Log will contain all hazards identified through the various methods applied by RTA. The Hazard Tracking Log will be submitted monthly before the 5th day of the month to MDOT as required in Section 6 of the MDOT State Safety Oversight Plan. RTA will meet with MDOT to review the Hazard Tracking Log and other activities associated with the safety risk management process.

The Hazard Tracking log format will be as follows:

HAZARD #	REPORTING SOURCE	HAZARD DATE	HAZARD TIME (24HR)	HAZARD TYPE	HAZARD DESCRIPTION	EFFECT ON SYSTEM	HAZARD RATING BEFORE	TEMPORARY MITIGATION (IF APPLICABLE)	HAZARD RATING AFTER	RESPONSIBLE PARTY	FINAL MITIGATION	CORRESPONDING CAP # (IF APPLICABLE)	CLOSED DATE

- **Hazard** – Refers to the number assigned to the hazard by the SSOC
- **Reporting Source** – Indicates the mechanism used to identify the hazard, i.e., operator report, near-miss, Safety Events investigation, internal safety or security audit results, rules compliance or training program, maintenance failure, facility or vehicle inspection, trend analysis, formal hazard analysis, etc.

- **Hazard Date** – Refers to the date the SSOC identified the hazard
- **Hazard Time** – Refers to the time the SSOC identified the hazard
- **Hazard Type** – Refers to the specific hazardous condition
- **Hazard Description** – A summary of the hazardous condition
- **Effect on System** – Refers to what the risk applies to
- **Hazard Rating Before** – Refers to the hazard severity and hazard frequency ratings initially assigned to the hazard by the SSOC before mitigation
- **Temporary Mitigation** – Refers to what action(s) were taken (if any) to address the hazard immediately
- **Hazard Rating After** – Refers to the hazard severity and hazard frequency ratings initially assigned to the hazard by the SSOC after mitigation
- **Responsible Party** – Refers to a person or entity addressing the hazard
- **Hazard Resolution / CAPs** – Refers to the actions recommended by the SSOC to address the hazard and to bring it to a level of risk acceptable to management
- **Final Mitigation** – Refers to the status of the recommendations
- **Corresponding CAP** – Refers to any CAP identified with the hazard
- **Closed Date** – Refers to the date SSOC accepts the final mitigation and completion of any corresponding CAPs

During the application of the safety risk management process for any hazard identified as an 'unacceptable hazard condition,' III A or higher, the Chief Safety Officer or designee will notify the SSO within one business day of discovery of an unacceptable hazard, followed by a preliminary investigation report within twenty-four hours. SSOC and the state oversight agency will approve any corrective action plans developed due to the investigation.

3.5 Infectious Disease Prevention Procedure

3.5.1 Purpose and Scope

Purpose: To establish procedures and assign responsibilities for preventing and mitigating the transmission of infectious diseases within the Regional Transit Authority (RTA) transit system, protecting the health and safety of employees, contractors, passengers, and the public, while ensuring service continuity.

Scope: This procedure applies to all RTA employees, contractors, volunteers, facilities (including administrative buildings, maintenance facilities, stations/stops), vehicles (revenue and non-revenue), and operations. It encompasses routine operations and preparedness for heightened response during public health alerts or declared emergencies. This procedure is implemented consistent with the guidance of the Centers for Disease Control and Prevention (CDC) and the Michigan Department of Health and Human Services (MDHHS).

3.5.2 Roles and Responsibilities

3.5.2.1 Accountable Executive (AE): Holds ultimate responsibility for the PTASP, including this procedure. Ensures adequate resources (financial, human) are allocated for implementation and maintenance. Approves significant policy changes related to infectious disease response.

3.5.2.2 Chief Safety Officer (CSO) / SMS Executive: Responsible for the development, implementation, maintenance, and periodic review/update of this procedure. Serves as the primary liaison with MDOT SSOA, MDHHS, and local public health agencies regarding infectious disease matters. Oversees related training, hazard assessments, and mitigation strategies and ensures integration within the overall SMS.

3.5.2.3 General Manager / Department Managers (Operations, Maintenance, HR, Communications): Responsible for implementing this procedure within their respective departments, ensuring staff are trained, necessary supplies (PPE, cleaning agents) are available, and relevant protocols (cleaning schedules, employee health screening, communication dissemination) are followed.

3.5.2.4 Fleet Manager/Maintenance Manager: Responsible for implementing vehicle cleaning/disinfection protocols, ensuring proper HVAC system maintenance and ventilation settings, and managing related supplies.

3.5.2.5 Training Manager: In coordination with the CSO, the training manager develops and delivers initial and refresher training on infectious disease prevention protocols to all relevant employees and contractors. The manager also maintains training records.

3.5.2.6 Human Resources: Manages employee health policies related to infectious disease (sick leave, return-to-work criteria), consistent with public health guidance and applicable laws. Coordinate communication regarding employee health benefits and requirements.

3.5.2.7 Safety Manager/Joint Labor-Management Safety Committee (JLMSC): Reviews infectious disease prevention procedures and practices, particularly regarding employee safety impacts, and provides recommendations to the CSO and AE.

3.5.2.8 All Employees, Contractors, and Volunteers: Responsible for adhering to all established infectious disease prevention procedures, properly using provided PPE, practicing good hygiene, reporting safety concerns and potential exposures/symptoms per RTA policy, and completing required training.

3.5.3 Prevention Measures

The RTA will implement the following measures, scaling efforts based on current public health guidance (e.g., CDC Community Levels, MDHHS alerts):

3.5.3.1 Hygiene Promotion:

Provide readily accessible alcohol-based hand sanitizer (at least 60% alcohol) for employees and passengers at key locations (e.g., facilities, vehicles).

Maintain stocked and functional handwashing facilities in restrooms and employee areas.

Display signage promoting hand hygiene, respiratory etiquette (covering coughs/sneezes), and staying home when sick, based on CDC/MDHHS recommendations. (Ref: CDC "Stop the Spread of Germs")

3.5.3.2 Cleaning and Disinfection:

- Maintain routine cleaning schedules for all facilities and vehicles.
- Following CDC guidance, implement enhanced cleaning and disinfection protocols for high-touch surfaces (e.g., handrails, fareboxes, door handles, seats, controls) during periods of elevated risk. (Ref: CDC "Cleaning and Disinfecting Your Facility")
- Utilize EPA List N-approved disinfectants effective against relevant pathogens. Ensure staff are trained on proper use, dilution, contact time, and safety precautions.
- Maintain cleaning logs documenting routine and enhanced cleaning activities.

3.5.3.3 Ventilation:

- Maximize fresh air exchange in facilities and vehicles by optimizing HVAC system settings (e.g., increasing outdoor air intake, running fans longer), following CDC and ASHRAE (American Society of Heating, Refrigeration, and Air Conditioning Engineers) guidance where feasible and safe. (Ref: CDC "Ventilation in Buildings")
- Ensure HVAC systems are properly maintained, and filters are replaced according to schedule.
- Encourage opening windows on vehicles when weather and safety conditions permit.

3.5.3.4 Personal Protective Equipment (PPE):

- Establish an RTA policy regarding using face masks/coverings by employees and passengers based on current CDC recommendations (e.g., Community Levels) and MDHHS or local health department mandates/guidance. Communicate policy.
- Provide employees with appropriate PPE (e.g., masks, gloves, and face shields) based on their job duties, potential exposure risks, and current public health recommendations.
- Train employees on proper PPE selection, use, maintenance, and disposal.
- Maintain an adequate inventory of necessary PPE.

3.5.3.5 Employee Health:

- Require employees to stay home if they exhibit symptoms of communicable infectious disease, consistent with CDC guidance and RTA's HR policies.

- Establish protocols for employees reporting potential exposures or positive tests, including return-to-work criteria based on current CDC/MDHHS guidance. (Managed by HR in coordination with Safety).

3.5.3.6 Communication:

- Utilize various channels (e.g., website, social media, onboard announcements, signage) to communicate relevant infectious disease information, prevention measures, and current policies to passengers.
- Establish clear internal communication channels (e.g., memos, emails, briefings) to inform employees and contractors about procedures, policies, potential risks, and available resources.

3.5.4 Hazard Identification, Risk Assessment, and Mitigation

3.5.4.1 Hazard Identification: The CSO, in coordination with department managers and the JLMSC, will use data and information from the CDC, MDHHS, local health departments, employee reports, and operational data to identify potential infectious disease hazards (e.g., new variants, community outbreaks, specific operational risks). (Ref: 49 CFR 673.25(b)(2)(ii))

3.5.4.2 Risk Assessment: Identified hazards will be assessed using the RTA's established Safety Risk Management process (as defined in PTASP Section 3.2), considering likelihood and severity based on current public health conditions and operational context.

3.5.4.3 Risk Mitigation: Based on the risk assessment, mitigation strategies will be developed and implemented, prioritizing measures according to the hierarchy of controls (elimination, substitution, engineering controls, administrative controls, PPE). Guidelines from the CDC and MDHHS will be considered primary sources for mitigation strategies. (Ref: 49 CFR 673.25(d)(2)(ii)) All mitigations will be documented.

3.5.5 Reporting and Documentation

- Cleaning and disinfection activities shall be documented via logs.
- PPE inventory and distribution shall be tracked.
- Employee training on infectious disease prevention shall be documented in training records.
- Significant infectious disease-related events or clusters affecting operations or employee health shall be reported internally to the CSO and relevant managers, and externally to MDHHS or local health authorities as required by law or regulation.
- All procedures, risk assessments, mitigation plans, and related documentation will be maintained for at least three years, as required by 49 CFR 673.31.

3.5.6 Implementation and Training

- All current employees and contractors will receive initial training on this procedure and relevant protocols within 90 days of the effective date, and all new hires will receive it during onboarding.

- Refresher training will be conducted annually or more frequently if significant changes occur in public health guidance or RTA procedures. Training content will be updated to reflect current CDC/MDHHS guidance.
- Training completion will be documented for all participants.

3.5.7 Evaluation and Continuous Improvement

- The effectiveness of this procedure will be evaluated annually as part of the PTASP review process and more frequently during heightened public health alerts.
- Evaluation metrics may include a review of cleaning logs, PPE usage observations, employee absenteeism trends related to illness, feedback from employees and passengers, internal audit findings, and assessment of alignment with current public health guidance.
- Findings from evaluations and audits will be used to identify deficiencies and drive continuous improvement of this procedure, integrated into the Safety Assurance process (PTASP Section 4).

3.5.8 References

- CDC Guidelines "How to Protect Yourself & Others," "Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes," "Core Recommendations for Preventing COVID-19 Spread in Communities”
- MDHHS Guidance - [https://www.michigan.gov/mdhhs/keep-mi-healthy/chronicdiseases/seasonal-respiratory-viruses/respiratory-disease-reports]
- EPA List N: Disinfectants for Coronavirus (COVID-19)
- Relevant RTA SOPs - SOP 004 NTD Safety Data Collection and SOP 217 Hazard Management Plan
- 49 CFR Part 673 Public Transportation Agency Safety Plans
- 49 CFR Part 674 State Safety Oversight
- FTA National Public Transportation Safety Plan (Current Version)
- MDOT System Safety Program Standard (Current Version)
- ASHRAE Guidance (relevant standards for building/transit ventilation)
- OSHA Guidance (relevant standards for PPE, hazard communication, respiratory protection)

4 Safety Assurance

As defined in the SMS, Safety Assurance means the processes within a transit agency's Safety Management System that ensure the implementation and effectiveness of safety risk mitigation and that the transit agency meets or exceeds its safety objectives through collecting, analyzing, and assessing information. To establish this process, RTA has developed a series of Standard Operating Procedures (SOPs) that establish the specific process on the RTA Streetcar. These SOPs cover operations, maintenance, safety, emergencies, etc. The entire inventory of SOPs is stored in RTA SharePoint.

4.1 Performance Monitoring and Measurement

This section addresses the monitoring and measurement process used to collect safety data on the RTA system. All supervisors and managers are responsible for implementing these policies and collecting data for their departments.

Safety data collection is managed using RTA SOP 003, entitled “NTD Safety Data Collection.” This SOP establishes the framework for management to collect all relevant safety data.

4.1.1 Safety Event Investigation

All RTA employees and contractors are expected to comply with RTA safety event reporting procedures and use the prescribed forms. The policy outlines roles, responsibilities, and safety event reporting thresholds, including Safety Events notification, reporting, and investigation throughout the organization.

Each Safety Event is investigated according to the latest version of the RTA Event Investigation Plan (EIP). The EIP complies with 49 CFR Part 672, 673 & 674, the State Rail Safety Oversight Rule for Rail Safety Events, and 49 CFR Part 1580, the U.S. Department of Homeland Security Rule affecting transit systems.

The EIP will be revised **annually or if** there is a change in the FTA or MDOT regulations and requirements. In addition to the EIP, RTA has several SOPs to address event investigations and management.

4.1.1.1 Safety Event Investigation and Reporting Criteria

Section 674 requires RTA to submit reports to MDOT regarding Safety Events as defined in the MDOT SSO Program. The CSO conducts internal Safety Event investigations on its behalf unless otherwise notified.

All investigations conducted by RTA will follow the RTA Event Investigation Plan (EIP). RTA must submit any updates and revisions of the EIP to MDOT as they are completed and implemented.

MDOT may participate in the investigation process when RTA is investigated on MDOT’s behalf. If MDOT elects to address an investigation of a Safety Events, the CSO may also conduct an independent investigation.

4.1.1.2 Internal Notification of Safety Events and Unacceptable Hazards

If a Safety Event occurs, the Supervisor or frontline employee will notify the established contact personnel included in the Emergency Notification list that a Safety Event has

occurred. The Supervisor will provide the time of the event, the location, and any other essential details. The Emergency Notification Groups include notifications to the established appointed contacts at RTA.

4.1.1.3 Notification of RTA Safety Events to External Agencies

Michigan Department of Transportation

As Section V of the MDOT SSPS program requires, the CSO or designee will notify the SSO of an event. The CSO must telephone the SSO office at **(517) 896-2799.** If the SSO is unavailable, the CSO or designee must leave a voicemail message with pertinent event information and a call-back number.

As established in MDOT SSPS Section V, upon notifying MDOT of an event, the RTA must provide the following information, to the extent known to the RTA at the time:

a. Name of caller
b. Type of event (collision, derailment, etc.)
c. Location of event
d. Date/Time of event
e. Transit vehicles involved (including route, the direction of travel, vehicle number, etc.)
f. Direction of travel for each involved transit vehicle
g. Information about any other vehicles involved
h. Number of fatalities
i. Number of injuries (individuals requiring immediate medical treatment away from the scene of the event)
j. A brief description of the event
k. A brief description of the investigation activities completed or anticipated in the short-term
l. A preliminary probable cause, if available

If the information is available, RTA must notify MDOT whether the National Transportation Safety Board (NTSB) is investigating or intends to investigate the event. If the NTSB decision is not known to RTA at the time of its initial report, then RTA will notify MDOT as soon as the NTSB's decision becomes known.

The Chief Safety Officer or designee shall notify MDOT, by the methods listed below, within 2 hours after the occurrence of any safety or security event involving a rail transit vehicle or taking place on rail transit-controlled property where one or more of the following occurs:

- Fatality
- Two or more injuries
- Derailment
- Collision resulting in one or more injuries
- Collision between two rail transit vehicles
- Collision resulting in disabling damage to a rail transit vehicle
- Evacuation for life safety reasons
- Unintended train movement

Federal Transit Administration

The following table details the Event types requiring two-hour FTA notification:

Event Types	FTA Notification (2 hours)
Fatalities	Death confirmed within 30 days of a Safety Event.
Injuries	Any harm to persons a result of a Safety Event that requires immediate medical attention away from the scene.
A collision between a rail transit vehicle and another rail transit vehicle	Any rolling stock used on a fixed guideway public transportation system, including but not limited to passenger and maintenance vehicles.
A collision resulting in one or more injuries	Any harm to persons a result of a Safety Event that requires immediate medical attention away from the scene.
A collision resulting in disabling damage to a rail transit vehicle	Damage to a rail transit vehicle resulting from a collision and preventing the vehicle from operating under its own power.
Unintended train movement	Any instance where a revenue vehicle is moving and is not under the control of a driver (whether or not the operator is physically on the vehicle at the time). This applies regardless of whether the event occurred in revenue service.
Evacuations	When persons depart from transit vehicles for life safety reasons, including self-evacuation.
Derailments	All mainline or yard

Per 49 CFR 674.33, the RTAs must notify the FTA of any reportable Safety Events within two hours of awareness. Per the Two-Hour Safety Events Notification Guide issued by FTA on September 24, 2021, RTA must provide notification to the FTA by contacting the U.S. Department of Transportation Crisis Management Center (CMC):

USDOT CMC Email (preferred)	USDOT CMC Phone
TOC-01@dot.gov	202-366-1863

When providing two-hour notifications to FTA, RTA should submit Safety Events information details as specified. RTA should also copy the MDOT SSO in emailed notifications to FTA to increase awareness and ensure compliance with this requirement.

RTA is not required to notify FTA in the event of:

- A fatality resulting from illness, other natural causes, and criminal homicides not related to collisions with a rail transit vehicle or
- A serious injury resulting from illness, or other natural causes or criminal assaults not related to collisions with a rail transit vehicle.

4.1.1.4 National Transportation Safety Board (NTSB)

RTA CSO or designee will notify the NTSB via the National Response Center at **844-373-9922** at the earliest possible time after the occurrence of any of the following railroad Safety Events:

A. No later than 2 hours after a Safety Event that results in:
   - A passenger or employee fatality or serious injury to two or more crewmembers or passengers requiring admission to a hospital;
   - The evacuation of a passenger train;

Refer to Appendix L of the Michigan Department of Transportation System Safety Program Standard 2024 for additional information and reporting Forms.

4.1.1.5 Safety Event Reporting and Documentation

All Safety Events reports must follow the RTA Safety Events Investigation Plan requirements, as approved by MDOT. Each RTA investigation conducted on behalf of MDOT must be documented in a final report that includes a description of investigation activities, findings, identified causal factors, and a corrective action plan, if applicable. At its discretion, and as specified in its Safety Events investigation plan, RTA may separate its investigation report into two parts:

- Description of investigation activities, investigation findings, and determination of the most probable cause and additional contributing causes; and
- Recommendations to prevent a recurrence, including a corrective action plan that implements the recommendations.

RTA submits written Safety Events and unacceptable hazardous condition reports on standard forms (approved by MDOT). Such written reports are submitted within 30 days after the last day of the month when the Safety Events occurred or when the unacceptable hazardous condition was identified. Reports contain the most probable cause, other contributing causes, corrective action plans, and a schedule for implementing corrective actions.

The status investigation reports, at a minimum, shall include:

- Minutes of any meeting held by an RTA ad hoc reportable event investigation committee or contractor;
- Disclosure of any immediate corrective actions RTA has planned or completed, principal issues or items currently being evaluated, and
- Overall progress and status of the investigation.

Written reports are filed for all events that fall into the Safety Events category. The CSO files a

monthly statement of all Safety Events and unacceptable hazardous conditions and tracks open corrective action items through completion.

Also, RTA files an annual safety performance report in a format approved by MDOT. At any time during an investigation, RTA shall be prepared to provide a full briefing on the known circumstances of the event, the status of RTA or NTSB investigation, and investigation activities.

Upon receipt of the RTA Safety Events investigation report, MDOT will review the information. If MDOT disagrees with the description of the investigation, the identification of primary and contributing causes, or the findings of the RTA report, MDOT shall communicate in writing to the CSO the area(s) of disagreement or concern. MDOT will work with RTA to address these issues in the RTA Safety Events investigation report. If an agreement cannot be reached, MDOT will issue its Safety Events investigation report, which may only state the RTA report and the MDOT dissent.

Reports and records of Safety Events investigations submitted to MDOT by RTA and related reports and records produced by MDOT and RTA will be treated as confidential information. They will not be released without the concurrence of both MDOT and RTA.

To reduce the potential for conflict, MDOT encourages RTA to submit a draft version of the Safety Events investigation report to the MDOT SSO so an agreement may be obtained on the most probable cause, additional contributing causes, corrective action plan, and an implementation schedule before the report is finalized and formally issued by RTA.

4.1.2 Safety Data Acquisition

The Safety Manager position is responsible for collecting and analyzing the safety performance data of RTA operations. The Chief Safety Officer is responsible for reviewing and analyzing all safety data reports from the Safety Manager to determine if safety performance meets established safety goals. This data includes injuries to passengers, contractor personnel, and the public, potentially hazardous equipment failures; unacceptable hazardous conditions; and rules and procedure violations. A closed-loop reporting system for identifying and monitoring safety-related

items have been established. Safety verification activities and results are reviewed and audited by the Operations Manager and reviewed by the Chief Safety Officer to close out each event. The Chief Safety Officer is responsible for providing safety data to the SSOC for review.

Tracking of hazard-related data is used to identify trends. These trends are further analyzed or investigated to determine causal factors. The Chief Safety Officer is responsible for facilitating this analysis and providing findings to the SSOC as part of a regular reporting process accomplished through interviews with personnel in the affected department(s) and analysis of pertinent documentation. Identified hazards are submitted with corrective action recommendations or requests for corrective action development.

The CSO is responsible for Safety Events, hazardous conditions, and RTA operations obtained from different reporting mechanisms. These include but are not limited to Safety Events/Injury Reports and Investigations, Incident Reports, Daily Operations Summaries, Operator and Supervisor Reports, Employee/Occupational Injury reports, mining of maintenance data, analysis of vehicle records, and procurement contracts. Additional data sources are other rail transit agencies, such as the SSO and the FTA. Refer to SOP 003 entitled “Safety Data Collection.”

Internal system safety audits are intended to officially evaluate accomplishments, problems, and trends related to RTA safety and evaluate the effectiveness of implementing the RTA PTASP. The CSO is responsible for directing the safety reviews and audits of RTA Streetcar and its contractors to determine performance related to Safety goals and objectives.

Organizational functions subject to the safety audit process include:

- Facility inspections
- Maintenance audits/inspections
- Review of rules, standard operating procedures, special bulletins, and orders
- Review of training/re-certification programs
- Emergency response planning, coordination, training
- Configuration Management
- Systems modifications (review and approval)
- Safety data analysis
- Employee safety programs
- Hazardous materials program
- Interdepartmental safety goals and objectives
- Occupational safety and health programs
- Contractor safety
- Procurement and specification engineering
- Drug and Alcohol Testing Program
- Any aspect or responsibility as outlined in this document

RTA and contractors are subject to safety audits. The critical nature of certain operations requires rigorous development of reviews and audits. These include training, maintenance, and operations activities. Both periodic and no-notice inspections are undertaken to address all aspects of the activity, including documentation, practices, and compliance with the RTA PTASP policy and other requirements. The CSO reviews training, techniques, and procedures to correct deficiencies identified during audits or other safety activities, including inspections and emergency drills.

4.1.2.1 Safety Audit Process

The CSO is responsible for the management of the Internal Safety Audit Program. All RTA employees and contractors must cooperate fully with Safety and Security personnel. Executive staff and managers ensure that their areas participate fully in the safety audit process.

4.1.2.2 Integrity of the Process

To maintain the review process's integrity, an external audit team coordinated by the CSO conducts safety audits. No team member shall audit a process or activity for which they are responsible. The CSO does not perform audits/reviews of those functions and elements it is directly responsible for implementing. All draft and final audit reports are provided to the SSOC members for review and concurrence.

4.1.2.3 Auditing Cycle

The RTA Internal Safety Audit Process will be an ongoing, continuous safety review process every three years. It is intended at least two components of the ASP will be audited per year. All ASP elements must be audited at least once per three-year cycle. The CSO must develop and annually submit a comprehensive Internal Safety Audit schedule to MDOT, detailing when it will audit the elements over the three-year period. The schedule is revised as necessary to accommodate schedules for auditors and the audited divisions.

The Audit Schedule presented in this section is based on Appendix K of the Michigan Department of Transportation System Safety Program Standard (August 2024). The Audit Schedule is as follows:

	MONTH	Jan			Feb				Mar				Apr					May				Jun			
	Week Ending	1/13	1/20	1/27	2/3	2/10	2/17	2/24	3/3	3/10	3/17	3/24	4/1	4/8	4/15	4/22	4/29	5/6	5/13	5/20	5/27	6/3	6/10	6/17	6/24
Task ID	Scope Item / Activity																								
1.0	**Internal Audit Checklist**																								
1.1	Develop Internal Audit Checklist																								
2.0	**Staff Interviews**																								
2.1	Develop Questions for Staff Interviews																								
2.2	Staff In-Person Interviews																								
2.3	Interview Summary Report																								
3.0	**Document Record Review**																								
3.1	In-Person Records Review																								
3.2	Records Review Summary Report																								
4.0	**Internal Audit Report Development**																								
4.1	Draft Internal Audit Report																								
4.2	Internal Report Review																								
4.3	Final Report																								

Annual audit schedules must be developed, reviewed, maintained, and updated to evaluate all elements during the three (3) year cycle audit.

The Chief Safety Officer or Safety Manager will notify the division/organization and MDOT a minimum of 30 days before a scheduled safety audit.

4.1.2.4 Checklists and Performance of Safety Audits

Audit checklists are developed in advance and submitted to MDOT for review. The checklists include the elements on which the department will be audited. Checklists are prepared to review the RTA PTASP section, documents referenced in the RTA PTASP section, previous audits, and corrective action plans.

The Audit Checklists are provided to MDOT 30 days in advance, at minimum, for their review and input. Audit checklists are then provided to the organization audited as soon as possible after receiving MDOT's revised checklist(s).

The audit team holds pre-audit and post-audit conferences with the entity being audited. The safety audits are comprised of record reviews, interviews, field observations, inspections, and measurements to verify the accuracy of documentation and spot inspections of facilities and equipment to verify compliance with the RTA PTASP, procedures, codes, and regulations.

4.1.3 Corrective Action Plans (CAP)

CAPs are required for findings identified as a result of:

- Event investigations
- NTSB or FTA investigations, special orders, or advisories
- MDOT audits, hazard investigations, or special studies
- An internal or routine RTA audit
- Hazard identification/resolution process
- Emergency drills/exercises

The CSO will enter a corrective action plan (CAP) within 30 calendar days after identifying the need for a CAP. RTA may request additional time to prepare the CAP for complex issues.

The corrective action plan will include:

- Identify noted deficiencies (time, date, location, department, issue)
- Pre- and post-implementation hazard rating
- Process, plan, or mechanism to address and resolve the deficiency
- An anticipated completion date for implementation of the action. The RTA or MDOT may propose interim milestones as appropriate
- Department(s) and person(s) who will be responsible for implementation, as assigned by the RTA
- Other critical information (e.g., monthly or quarterly progress updates)

If the NTSB investigates, RTA shall review the NTSB findings and recommendations to develop a CAP. If the NTSB requires a CAP, RTA shall create it.

The CAP log is reviewed at each SSOC meeting, and updates/corrections are reviewed. All corrective actions are prioritized for implementation using the risk assessment matrix. They are assigned a responsible person to lead the corrective action effort and close it after resolution. MDOT requires verification from RTA that the CAP has been implemented by documentation submitted by RTA, independent visual inspection by MDOT, or both.

Once the SSOC approves the CAP, the CSO will forward the CAP to MDOT for review and approval. MDOT will notify RTA in writing its acceptance or rejection of the CAP within 30 calendar days after receipt of the plan. An exception to MDOT pre-approval may be made for immediate or emergency corrective actions that must be taken to ensure life safety.

If MDOT rejects the CAP, the CSO will have 30 calendar days to address noted deficiencies in the plan and submit a revised plan to MDOT for evaluation.

RTA shall develop and maintain a CAP tracking log, identifying all CAPs and implementation status. This log must be submitted by the 5th day of each month to MDOT in electronic form via email. The monthly CAP log should contain open CAPs, including status updates and revisions

to plans, responsible parties, and target implementation dates as appropriate. The submittal may be combined with the monthly Event Tracking Log and Hazard Tracking Log submittals

4.1.4 Rule Compliance

All employees of RTA and its contractors are responsible for preventing Safety Events, identifying hazards, and resolving such risks. The appropriate department manager will maintain reports of all Safety Events, deficiencies, near misses, and defects.

RTA is responsible for the safe operation of the streetcar system. Responsibilities include:

- Preparation and implementation of safe operating policies, plans, rules, and procedures contained in the Streetcar SOP Manual, Streetcar Rule Book, and observance of Memorandum that addresses system changes;
- Required policies, plans, rules, and procedures for safe operation and maintenance are developed by RTA Streetcar. (The Streetcar SOP Manual and Rule Book will be reviewed annually with review and modification dated accordingly. Streetcar SOPs and Rules may be revised to reflect changes in operating conditions. The SSOC shall review all new or modified SOPs or rules. Revised SOPs or rules will be distributed to all employees; each employee must sign upon receipt.
- Personnel are annually re-trained, tested, and certified in the proper performance of all safety-related rules and procedures that cover their specific job function, which applies to both routine and emergency conditions;
- Ensure the number of hours worked during any seven-day rolling period does not exceed seventy hours;
- Ensure the number of consecutive days worked does not exceed thirteen days;
- Employees are provided access to or copies of safety and emergency rules, procedures, and policies that affect them;
- Monitoring adherence to safety-related operating and maintenance policies, plans, rules, and procedures through periodic in-service evaluations using the “Observation Report Form” by RTA Supervisors or a Manager. All deficiencies are reported, in written form, to the SSOC for review, re-instruction, or re-training. Supervisor ride checks and rule conformance checks shall follow the requirements outlined in Employee Qualifications SOP and Rule Book;
- When necessary, the Training Manager performs performance coaching or reinstruction training for Supervisors. Supervisors are expected to comply with all RTA streetcar rules and SOPs and enforce them as they apply to streetcar service and personnel management.
- Additionally, Supervisor operating skills are assessed annually by participation in the Streetcar Recertification Program;
- Personnel whose safety record requires follow-up, additional training, or discipline, including discharge, is identified through records maintenance, indicating safety violations of rules and procedures. RTA maintains a safety/rule violation log, which chronicles safety/rule violations for each month. The Chief Safety Officer will report rule violations to the SSOC.
- RTA will develop a preventive maintenance schedule for each system hardware/software element designed to maintain system safety. Reported deficiencies and defects in equipment and facilities are corrected and monitored to ensure satisfactory resolution. Only equipment known to be free of safety-related defects is placed into service, and
- Monitor the safety/rule violation logs to identify trends requiring re-evaluating a specific procedure or practice.

4.1.5 Inspections

RTA will ensure that all systems, equipment, and facilities operate as required or that operational safety is not compromised in the event of failure or degradation of functionality. This maintenance aspect pertains to RTA Streetcar customers, emergency response agencies, the public, employees, and subcontractors' safety.

The Safety Manager or department heads will conduct safety inspections. The inspections will be unannounced and documented with checklists and photos. The CSO will review inspection reports.

4.1.5.1 Facilities Inspections

All RTA operating and maintenance facilities will undergo a complete inspection at least once per year to ensure employees' safety and health. Individual maintenance shops within the maintenance facilities are inspected monthly. Inspection reports are issued, which list the hazards, and the safety and health problems found during the inspection. Hazards identified during inspection are subject to the safety risk management process. Follow-up inspections and reports are completed within 30 days. If the inspection findings can't be resolved within 24 hours, a work order will be opened and tracked until the finding is determined.

4.1.5.2 Equipment Inspections

Inspections of facility equipment are made per appropriate maintenance manuals and procedures. The Maintenance-of-Way will ensure equipment and facilities are maintained at an optimum level of safety. Hazards identified during inspections are entered into the Hazard Tracking Log as appropriate and tracked until closure.

4.1.5.3 Streetcar Vehicles

Streetcar vehicles are maintained per manufacturer recommendations at a minimum or a higher level. Most of the maintenance is time-driven based maintenance. Maintenance is tracked and coordinated through time schedules. All records are maintained in a database (RTA) for each vehicle. All hard copies are kept in independent books for each vehicle for three years. All work completed for each vehicle is tracked through assigned work order numbers for all repairs or designated maintenance inspection intervals. RTA is responsible for all documentation control.

Streetcar maintenance schedules will follow a progressive preventative maintenance cycle , starting with the lowest mileage (routine inspection) through mid-level and major inspections. All streetcar vehicle inspections cover the progress of streetcar equipment at higher levels of detail for each inspection. Once the highest level of inspection is reached, the cycle repeats. Mid-level and major overhauls are also scheduled in conjunction with the inspection cycle. These are time-based overhauls and rebuilds of major equipment per the manufacturer's requirements.

The maintenance criteria described above are strictly followed. If a streetcar is at the mileage or time requirement and the scheduled maintenance is not completed, the vehicle must be removed from service until the required maintenance is completed. No vehicles can carry passengers in service with any safety-critical faults. All safety-related deficiencies shall be classified as an emergency work order and tracked continuously. All defects are followed in the defect tracking log, which is the responsibility of the Maintenance-of-Way. Copies of defect write-ups and completed work orders will be kept on-site for three years.

4.1.5.4 Maintenance of Way (MOW)

Track and structure inspections (including OCS and TPSS) shall be made per industry-accepted track maintenance standards or OEM recommendations, whichever is greater.

Track inspections shall include, at a minimum, the following:

- Ultrasound inspections to monitor defects and internal flaws
- Gauge, cross-level, and other pertinent geometry measurements
- Routine structure inspections, including trackways, inverts, and at-grade structures per an approved inspection cycle
- Walking inspection by trained personnel

Streetcar maintenance-of-way will be the responsibility of the Maintenance Department. All maintenance of way (track-switch-signals) will be performed per current OEM requirements at a minimum. These inspections follow weekly, monthly, and quarterly reviews. All maintenance shall be reported using maintenance software. All open defects are recorded in Streetcar open defect tracking sheets. All reports are submitted monthly and kept on file at RTA.

4.1.5.5 Overhead Contact Wire

The Overhead Contact System (OCS) maintenance will have regular inspections per industry best practices or OEM recommendations. All inspection and corrective actions are reported monthly through the RTA MMIS process. Defect tracking is done through the Streetcar OCS defect repair tracking spreadsheet. All MMIS records are maintained at the Streetcar facility.

The Overhead Contact System inspections shall be made following OEM and industry-accepted procedures, including, but not limited to, the following:

- Foundations
- Poles
- OCS Structure Free of Trees and Bushes
- Traction System Grounding & Negative Return Connections
- Warning Signs, Pole Number Plates
- Protection Guards / Covers
- Insulators and Cable terminations
- Contact Wire Supports
- Hangers
- Tension Wheel Assembly
- Pole Mounted Switches
- Height

4.1.5.6 Traction Power Substations (TPSS) Interconnect and Distribution Systems

Maintenance will be conducted weekly, monthly, semi-annual, and annual per the manufacturer's recommendations and APTA guidelines. All maintenance and repairs are recorded on inspection forms and submitted to the Maintenance-of-Way for review. The Maintenance-of-Way will track all open defects on an open defect-tracking sheet and keep records at the streetcar office.

Safety-critical equipment that does not meet established requirements is removed from service. Defects reported by Operators to Supervisors are recorded in the defect tracking log.

Traction Power Sub-Stations inspections shall be made following OEM & industry-accepted procedures including, but not limited to, the following:

- Bus bars
- Cable terminations
- Bolted connections
- DC Feeder
- Disconnect switches.
- Switchgear inside
- Emergency Shutdown System

4.1.5.7 Checklists

With support from the Safety Manager, the Maintenance-of-Way will develop a Facility Safety Inspection Checklist and Stop Safety and Security Inspection Checklist based on OSHA Standards and the Original Equipment Manufacturer (OEM). These checklists shall be used to perform safety-related inspections of facility maintenance equipment. The list will be part of the Operations and Maintenance Plan.

The Facilities and Streetcar inspections will be tracked through the RTA MMIS. The software will issue the work orders for the inspections, and the employees need to close the work order on the system once the task is completed. The SSOC then evaluates the checklists for final approval.

At random intervals, the Safety Manager will perform inspections to verify previous reviews, and maintenance will be performed following the OEM recommendation. If areas of improvement are found, the Maintenance-of-Way will be required to present CAPs to the CSO. Those CAPs will be added to the CAP Log for tracking and closure.

4.1.5.8 Station Inspections

Stations have daily inspections and cleanings, including graffiti removal, spot cleaning of platforms and fixtures, and litter removal, including pedestrian areas. Pressure washing of the platforms and fixtures is scheduled monthly or as needed based on these inspections and the condition of the surfaces. Snow and Ice management will be performed in accordance with RTA SOP 504 Inclement Weather.

4.1.5.9 Resolution of Review/ Inspection Findings

Each RTA facility inspection report is reviewed, and the necessary work orders are generated for repairs. All identified hazards are logged in the Hazzard Log and processed per procedure.

4.1.6 Hazardous Material and Local, State and Federal Regulations

The Occupational Safety and Health program aims to achieve a safe working environment for employees and minimize the likelihood of Safety Events. The program emphasizes recognizing, evaluating, and controlling hazards arising in and from the occupational environment.

4.1.6.1 Industrial Hygiene Surveys

Industrial Hygiene surveys shall be conducted under the Safety Manager's direction and provided to the CSO to evaluate the degree of employee exposure to chemical and physical agents encountered in the workplace. The survey results are utilized to determine the necessary corrective actions, including implementing engineering and administration controls or using personal protective equipment. Industrial hygiene surveys are performed initially on a hazard priority basis to identify and eliminate exposure beyond the Threshold Limit Value (TLV). Industrial hygiene surveys will be conducted periodically after that to monitor the effectiveness of controls

and as conditions change. Any hazards identified during the industrial hygiene surveys will be subject to the hazard analysis process.

4.1.6.2 Hazardous Materials Control

The Hazard Communication Program covers the procurement, receipt, storage, and disposal of hazardous materials. It also documents the maintenance of Safety Data Sheet (SDS) binders and employee training. RTA's Hazard Communication Program complies with Title 29 Code of Federal Regulations Part 1910.1200, Hazard Communication Program.

Hazardous waste/chemical safety inspections are included in the responsibilities for safety inspections by the Safety Manager. Consultants may be hired for special projects such as indoor air quality, chemical vapor, and particulate sampling when necessary.

The SSOC will approve all hazardous materials before being brought onto the site. Annually, the Safety Manager will present to the SSOC a list of SDS materials, special measures to ensure safe use, and a certification that all appropriate employees have been trained on properly using these materials. The CSO reserves the right to reject a product if it is deemed too hazardous for employee use.

The Safety Data Sheets (SDS) review/request procedure, which requires review and approval by the CSO or designee, is included in the Hazard Communication Program. These programs are the responsibility of the affected department, the Safety Manager, and the CSO. Program effectiveness is reviewed via the Internal Safety Audit Process. The Maintenance-of-Way reviews Safety Data Sheets (SDS) for all chemicals and other hazardous materials considered for purchase and use for approval. The user furnishes the manufacturer's SDS for hazardous products and information on the planned use and application methods. Follow-up is conducted on approved products to ensure safe/proper handling methods are utilized. The Safety Manager is responsible for keeping all SDSs current.

4.1.6.3 Personal Protective Equipment

The Chief Safety Officer reviews and approves all personal protective equipment RTA personnel use according to respiratory, hearing conservation, electrical gloves, and other applicable safety standards.

4.1.7 Drug and Alcohol Program

RTA is a drug-free workplace and complies with all U.S. Department of Transportation, Federal Transit Administration provisions, 49 CFR Part 655, Prevention of Alcohol Misuse in Transit Operations, and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs.

Covered employees and contractors will receive a minimum of 60 minutes of training on the effects and consequences of prohibited drug use and additional training on the impact of alcohol on personal health, safety, the work environment, and the signs and symptoms that may indicate prohibited drug use. In addition to the covered employee training, supervisors will receive an additional minimum of 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable drug use and potential alcohol misuse.

Drug and alcohol testing is required under the following circumstances:

- Pre-employment, including placement of an existing employee in a safety-sensitive position (drug test only)
- Reasonable suspicion an employee has used a prohibited drug or misused alcohol
- Post-event following specific types of Safety Events
- Random testing for safety-sensitive personnel
- Return to duty following completion of drug/alcohol rehabilitation program
- Follow-up testing for employees who have sought and completed a treatment program

Under the FTA drug testing regulations for employees in safety-sensitive positions, laboratory tests on urine specimens are conducted for five types of drugs or their metabolites. These drugs are:

- Marijuana
- Cocaine
- Phencyclidine (PCP)
- Amphetamines (e.g., racemic amphetamine, dextroamphetamine, and methamphetamine)
- Opiates (e.g., heroin, morphine, codeine)

4.1.8 Employee Safety Reporting

The RTA has implemented an Employee Safety Reporting Program that will:

- Encourages employees to report any safety-related situation
- Emphasizes benefits for safety, not safety record
- Establishes clear guidelines for unacceptable behavior
- Balances learning and accountability
- Establishes several methods for employees to report safety issues.

The guidelines for the employee safety reporting system are in RTA SOP 221, Employee Safety Reporting Program. Self-reporting is not an out-of-jail card; it is a process that focuses on identifying mistakes made in good faith and providing re-education on safe practices, not punitive actions.

The following table presents a guideline in cases of safety events:

Human Error	At-Risk Behavior	Reckless Behavior
An inadvertent action – slip, lapse, mistake	A choice – a risk not recognized or believed justified	Conscious disregard of unreasonable risk
Manage through: ➢ Processes & procedures ➢ Checklists ➢ Training ➢ Design	Manage through: ➢ Increase situational awareness ➢ Remove incentives for at-risk behavior ➢ Create incentives for safe behavior	Manage through: ➢ Remedial action ➢ Punitive action

Every month, in addition to the implementation of the Training Matrix covering all SOPs and required OSHA training, the Safety Manager will report to all employees via regularly scheduled safety meetings the status and disposition of Safety emails, event investigations, hazards, and safety risks identified, as well as updates of the safety performance measures.

The Maintenance Manager will report to all employees via daily job safety briefings and toolbox meetings operator daily orders any hazards or safety risks identified.

4.2 Management of Change

Configuration management requirements will be included in all contracts to ensure changes to equipment and facilities are adequately documented and approved. The configuration management process uses baseline management to ensure that the technical baseline is defined and controlled throughout the maintenance and operation phase and that the end products satisfy the technical and operational requirements derived from the system's needs. Selected documentation, such as as-built drawings, manuals, procedures, and other documents, are formally designated and approved as part of the technical baseline and are under the control of RTA. For future capital projects, all documents related to the segment/phase under the supervision of a contractor will be turned over to RTA for control and maintenance following said phase.

RTA or their designated contractor shall be responsible for quality control testing and inspections if required under an approved Quality Control Plan for future capital or maintenance improvement projects.

For more details, refer to the RTA Procurement Policy revised in January 2025.

Additions, modifications, or deletions to rail SOPs and the existing configuration of presently operating rail system fixed facilities, rail rolling stock, and equipment directly related to rail rolling stock operation are approved by the RTA SSOC. These reviews are established to ensure system and operational changes are approved before implementation, and drawings, manuals, and other related documents, including training programs, are updated to reflect these changes, which are also reflected in the Maintenance Management Plan.

Upon approving any system or operations change, RTA will create a Special Instruction or create or revise current SOPs to advise affected employees. Supervisors will distribute new control documents during targeted training to employees, ensuring they understand the operational change as it applies to their jobs.

4.2.1 Purpose and Policy

The Regional Transit Authority of Southeast Michigan (RTA) is committed to managing changes to its system, operations, procedures, and organization to ensure the continued safety of its passengers, employees, contractors, and the public. This Management of Change (MoC) process establishes the SMS framework required by 49 CFR § 673.27(c) to proactively identify changes, assess their potential impact on safety performance, and implement necessary controls before changes are made. This process is integral to RTA's Safety Management System (SMS) and Safety Assurance activities.

4.2.2 Scope and Definition of Change

- For this MoC process, a "change" includes, but is not limited to, any proposed modification, addition, or removal related to:

- **Configuration Items:** (as primarily addressed by SOP 007)
  - Rolling stock (vehicles) design, configuration, or major components
  - Track, special trackwork, O/M Signage, Rights-of-Way
  - Signal and Power Systems, Traction Power Substations (TPSS)
  - QLINE Facilities and modifications/rehabilitations
  - Communications Equipment
  - Fire Life Safety Systems
  - Hazardous Materials / Environmental Controls
  - OEM Modifications impacting form, fit, function, safety, or warranty
- **Operational & Organizational Items:** (Also covered under this PTASP MoC framework)
  - Operational policies, rules, or procedures (Operating/Maintenance/Safety)
  - Software or technology systems used for operations, maintenance, or safety management
  - Organizational structure, staffing levels, or roles/responsibilities impacting safety functions
  - Significant changes to training programs or requirements (Safety/Security, Drug & Alcohol)
  - Implementation of new regulations, standards, or legal requirements
  - Introduction of new contractors performing safety-sensitive functions
  - Significant changes to emergency preparedness and response plans or procedures
  - Changes impacting ADA compliance

4.2.3 Management of Change Process

RTA shall follow these steps to manage changes:

1. **Change Identification and Proposal:** Any employee, contractor, or stakeholder can identify a potential need for change. Proposed changes shall be formally documented using the process defined in SOP 007 (e.g., Engineering Change Request - ECR) or an equivalent RTA-approved format for non-configuration changes and submitted to the relevant Department Manager and the Chief Safety Officer (CSO).

2. **Initial Safety Screening:** The CSO or designee (e.g., Safety Manager), shall conduct an initial screening of the proposed change regardless of whether it is primarily configuration-related or operational/organizational. The purpose is to determine if the change could potentially introduce new hazards, affect existing safety controls, or otherwise impact the agency's safety performance, potentially meeting the definition of safety/security-critical (per SOP 007 Sec VI.A). This screening will consider the change's nature, scope, and potential interactions. The screening decision and rationale shall be documented.

3. **Safety Impact Determination & SRM Trigger:**

   - If the initial screening determines the change results in **no significant hazard** (e.g., Negligible/Low risk per PTASP Risk Index/Hazard Acceptance Criteria), the CSO shall document this finding, advise the Accountable Executive (AE), and notify the Safety and Security Operations Committee (SSOC) as per SOP 007. The change may proceed through normal administrative/operational approval channels (potentially as a Class II change if configuration-related per SOP 007) outside the formal SRM process while still adhering to applicable configuration management and documentation procedures where relevant.

   - If the initial screening determines the change may impact safety performance or introduce **significant hazards** (e.g., Critical/Catastrophic risk; red/yellow designations per

PTASP Risk Index/Hazard Acceptance Criteria), the change must be evaluated through RTA's Safety Risk Management (SRM) process, as mandated by 49 CFR § 673.27(c)(2) and detailed in Section 3 of this PTASP.

4. **Application of Safety Risk Management (SRM) Process:** For changes requiring SRM evaluation:
    - The CSO shall initiate the SRM process detailed in PTASP Section 3 with assistance from subject matter experts as described in SOP 007 Sec VIII.A.2.
    - Relevant subject matter experts and departments shall participate in identifying potential hazards associated with the change.
    - A formal Safety Risk Assessment (per Section 3.2) will be conducted to determine the severity and likelihood of potential consequences, considering existing and proposed mitigations.
    - Appropriate Safety Risk Mitigation (per Section 3.3) shall be developed for any unacceptable risks identified. Recommendations for corrective actions will be prepared as described in SOP 007 Sec VIII.A.4.
    - The results of the SRM assessment, including identified risks and required mitigations/corrective actions, shall be documented and presented to the appropriate safety committee (SSOC) as per SOP 007 Sec VIII.A.4 & 5.
5. **Change Approval:**
    - Based on the outcomes of the initial screening or the SRM process, the SSOC shall decide on the proposed change. Options include:
        - Proceed with the change as planned (if the risk is acceptable or mitigated).
        - Implement corrective action and proceed with the change.
        - Implement a different change (subject to MoC review).
        - Provide guidance on alternate means to eliminate hazards.
        - Disapprove the change.
    - The AE has the final decision-making authority (SOP 007 Sec VII.A.). Approval documentation shall confirm that required SRM activities were completed and that necessary risk mitigations/corrective actions are included in the implementation plan.
6. **Implementation:**
    - An implementation plan detailing the steps, timeline, and responsible parties shall be developed for all approved changes.
    - For changes impacting safety, the plan must include implementing all required risk mitigations/corrective actions before or concurrent with the change taking effect.
    - Relevant procedures, manuals, drawings, and other documentation shall be updated consistent with the configuration control processes detailed in SOP 007 and supporting document control procedures.
    - Necessary training for affected personnel shall be completed before the implementation of the change.

7. **Communication:** Changes and associated safety requirements or mitigations shall be communicated to all relevant personnel, contractors, and stakeholders before implementation, consistent with Section 5.2 (Safety Communication).
8. **Post-Implementation Monitoring & Verification:** For changes that underwent SRM, the CSO or designee shall monitor the implementation and effectiveness of the change and associated risk mitigations. This may include targeted inspections, audits, or performance data analysis to verify expected safety performance and identify unintended consequences. The results shall be documented.

4.2.4 Roles and Responsibilities

- **Change Initiator:** Responsible for completing and submitting the change control document (per SOP 007 Sec V.C).
- **Relevant Stakeholder/Department Managers:** Responsible for compliance within their assets, developing internal procedures (per SOP 007 Sec V.B), reviewing changes, participating in SRM, implementing approved changes, and ensuring staff are trained.
- **Chief Safety Officer (CSO):** Responsible for monitoring compliance with MoC/CCMP (SOP 007 Sec V.A), overseeing the MoC process, conducting/assigning initial safety screenings, initiating/overseeing SRM assessments, reviewing changes with SMEs, preparing briefs/recommendations for SSOC, presenting findings to SSOC (SOP 007 Sec VIII), maintaining MoC records, and verifying post-implementation effectiveness.
- **Safety Manager:** Supports the CSO in executing the MoC process.
- **Safety and Security Operations Committee (SSOC):** Responsible for reviewing proposed changes with significant hazards, deciding on the course of action (SOP 007 Sec VIII.A.6), and approving stakeholder procedures (SOP 007 Sec V.B).
- **Accountable Executive (AE):** Holds ultimate accountability for SMS/MoC/CCMP oversight (SOP 007 Sec I.A, V.A), makes final decisions on safety/security criticality and change classification (SOP 007 Sec VI.A, VII.A), provides direction to CSO on hazard briefs (SOP 007 Sec VIII.A.4), and approves changes based on SSOC recommendation/risk level.

4.2.5 Documentation and Recordkeeping

All activities and decisions associated with this Management of Change process shall be documented as required by SOP 007 Sec IX, including Change Proposals/ECRs, screening results, SRM assessments (if applicable), risk mitigation/corrective action plans, SSOC/AE decisions, approval records, communication records, implementation verification, and post-implementation monitoring results. Detailed change configuration records form the basis for ongoing life cycle control and ensure an audit trail. Records shall be maintained under Section 2.3 of this PTASP and applicable RTA record retention policies.

4.3 Continuous Improvement

Continuous improvement is measured through monitoring RTA safety performance indicators.

4.3.1 Purpose

RTA is committed to improving safety on an ongoing basis by proactively identifying and addressing safety deficiencies within its SMS processes and safety performance. This section outlines RTA's process for meeting the continuous improvement requirements of 49 CFR § 673.27(d), ensuring a systematic approach to enhancing safety.

4.3.2 Annual Safety Performance Assessment Process

RTA shall conduct a comprehensive safety performance assessment at least annually.

1. Timing and Leadership: This assessment will typically be conducted during the fourth quarter of the calendar year under the leadership of the Chief Safety Officer (CSO), with participation from relevant Department Managers and the Joint Labor-Management Safety Committee (JLMSC).

2. Inputs: The assessment shall review, at a minimum:

    - Safety performance data is compared against the safety performance targets established in Section 1.2 of this PTASP and the National Public Transportation Safety Plan (NPTSP).
    - Results from Safety Assurance activities (Section 4.1), including internal/external audits, inspections, investigations, and employee safety reports.
    - Analysis of Corrective Action Plan (CAP) implementation effectiveness and trends (Section 4.1.3).
    - Outcomes and effectiveness of the Management of Change (MoC) process (Section 4.2).
    - Recommendations and feedback from the JLMSC (Section 2.2.1.10).
    - Results of relevant internal safety reviews required or conducted by the MDOT State Safety Oversight Agency (SSOA).
    - Communications or directives from FTA or other regulatory bodies.

3. Assessment Activities: The review team will analyze the inputs to evaluate the effectiveness of SMS processes and determine overall safety performance against established targets.

4. Outputs - Deficiency Identification: The assessment will formally identify and document any deficiencies, including:

    - SMS Process Deficiencies: Weaknesses or non-conformities in the implementation or effectiveness of RTA's documented SMS policies, procedures, and practices (Sections 2, 3, 4, 5).
    - Safety Performance Deficiencies: Instances where RTA failed to meet one or more of its established annual safety performance targets (Section 1.2).
    - Deficiencies identified through MDOT SSOA internal safety reviews or audits.

4.3.3 Addressing Identified Deficiencies

All deficiencies identified during the Annual Safety Performance Assessment require documented action:

1. SMS Process Deficiencies: These deficiencies will typically be addressed through:
    - Revising relevant policies, procedures, or checklists (potentially triggering the MoC process, Section 4.2).
    - Implementing specific Corrective Action Plans (CAPs) following the process in Section 4.1.3.
    - Providing additional training or communication (Section 5).
2. Safety Performance Deficiencies (Failure to Meet Targets): When the annual assessment identifies a failure to meet an established safety performance target, RTA shall apply the principles mandated for LUAPs in 49 CFR § 673.27(d)(3) as a best practice for robust SMS and continuous improvement, at a minimum:
    - Assess Associated Safety Risk: Utilize the Safety Risk Management (SRM) process (Section 3) to analyze the contributing factors behind the performance shortfall and assess the associated safety risk(s).
    - Mitigate Associated Safety Risk: Based on the SRM assessment, develop and implement specific safety risk mitigations (using methods described in Section 3.3) designed to address the root causes of the performance deficiency and reduce the identified safety risk(s).
    - Prioritize Resources: Under the direction of the Accountable Executive, RTA Management will prioritize resources and actions toward implementing the identified risk mitigations that are reasonably likely to improve performance and assist RTA in meeting the safety performance target in the future.

4.3.4 Continuous Improvement Plan

Following the Annual Safety Performance Assessment, the CSO shall oversee the development of a formal, documented Continuous Improvement Plan.

1. AE Direction: This plan shall be developed and carried out under the direction of the RTA Accountable Executive, ensuring top management commitment and oversight as required by 49 CFR § 673.27(d)(4).
2. Content: The plan will consolidate all deficiencies identified during the annual assessment (both SMS process and safety performance deficiencies) and detail the actions required to address them. This includes outlining specific tasks (e.g., procedure updates, training, SRM-derived risk mitigations), responsible parties/departments, and timelines for completion.
3. Tracking and Verification: The CSO will monitor progress on the Continuous Improvement

Plan actions and report to the SSOC and the AE. Subsequent safety Assurance activities (Section 4.1) will verify the completion and effectiveness of actions and review them during the next Annual Safety Performance Assessment cycle.

4. Documentation: The Continuous Improvement Plan and supporting assessment documentation shall be maintained under Section 2.3 of this PTASP.

4.3.5 Integration with Other Processes

This continuous improvement process is intrinsically linked to other elements of the RTA SMS. Deficiencies may trigger actions managed through the CAP process (Sec 4.1.3) or the MoC process (Sec 4.2). Performance monitoring (Sec 4.1) provides critical input, and SRM (Sec 3) is required to analyze performance shortfalls. Safety Promotion (Sec 5) activities may be utilized to communicate improvements and reinforce expectations.

4.3 RTA PTASP Annual Review Process

RTA has the authority to develop, implement, and manage the RTA ASP. The CSO, with support from all other employees and contractors, has the primary responsibility of assuring the implementation of the ASP with oversight and review by the SSOC. Annual review of the ASP is mandatory, and specific responsibilities of other contractors within the ASP framework include but are not limited to:

- By September 1 of each year, notify the CSO in writing of any recommended changes to the ASP for review and approval by the SSOC
- The review, under the direction of the CSO, will be completed by December 31 of that year
- Revisiting the ASP annually to reflect changes in organizational structure and new systems that require significant changes in operation
- Review progress on goals and objectives
- Refine and improve on the current goals and objectives of the SMS program
- Identify new tasks or objectives to respond to system growth or any new regulations that affect Q-Line safety and security
- Identify any additional or emerging safety or fire/life safety-related tasks and responsibilities
- Submit revisions to the SSOA by February 1 of the following year

PTASP ANNUAL REVIEW ACTIVITIES	
SEPT 1	Recommendations for updates received by CSO
DEC 1	CSO reviews recommendations and updates PTASP
JAN 1	CSO submits updated PTASP to **Joint Labor Management Safety Committee,** SSOC and Board of Directors for approval, any updates, and signature of AE
FEB 1	CSO submits PTASP to SSO for acceptance

5 Safety Promotion

5.1 Competency and Training Program

5.1.1 Overview

Safety training is conducted on RTA facilities, equipment, and vehicles. The CSO oversees the formulation of training programs and records. Operating rules and standard operating procedures (SOPs) will be approved by the SSOC and provided to all personnel.

The Safety Manager periodically completes reviews and oversight activities associated with the program. Activities or functions judged to be safety-critical may require special training or certification. This ongoing training is included in regular safety meetings, and all documentation is kept at the RTA facility.

Operations and maintenance employees undergo refresher training at least annually and when situations related to employee performance warrant it. Emergency responders are also trained during the pre-revenue period and during drills that occur at least annually. These are also documented, and the records are retained at the RTA facility.

5.1.2 Employee Safety

5.1.2.1 Operating Personnel Training

All non-administrative operating personnel must complete the streetcar operation training program to become certified “revenue operations” qualified.

All new non-administrative personnel will be given the Streetcar Operating Training Course. This course covers Standard Operating Procedures and Operator Rules governing streetcar alignment and operation. Operating time across all shifts and known operating events will be performed and documented. Qualified individuals are issued access to manuals for the streetcar.

New non-administrative personnel are also evaluated by established certified Management/Supervisors using an Observation Report Form. New personnel must meet all criteria satisfactorily or receive additional training, or they will not become certified. The Training Manager, on a separate occasion before certification, will determine whether the individual demonstrates safe control of the streetcar. Each individual is certified with written and practical testing to validate operational readiness.

Annually, each individual is given a refresher course on the rules and procedures and will re-certify with written and practical testing. The re-certification may consist of one or more of the following: a quiz or test and a demonstration of troubleshooting operating techniques. Any operator who fails the annual examination may be given special retraining. Failure to recertify will result in the inability to operate the vehicle.

Updated training materials will be developed in coordination with the Managers of Operations Maintenance, Safety, and Supervisors by the Training Manager before opening any new rail extension or major modification to the existing streetcar line. Operations personnel will be certified by written and practical testing.

RTA will require Certified operators to be subjected to periodic in-service evaluation by Operations Supervisors who monitor their compliance with rules and procedures outlined in the Rule Book and SOPs. The Supervisor should complete an Observation Report Form after the in-service

evaluation and review the information in the report with the Operator. Positive reinforcement is given as warranted. Operators observed violating any rules or procedures may be subject to retraining or recertification.

The Safety Manager will maintain a Rule Violation Log that chronicles violations monthly and administers all actions, retraining, and re-instructions. Supervision determines the consequence of any rule violations for all personnel routinely on-site.

5.1.2.2 Maintenance Personnel Training

Manuals, handbooks, and other documentation developed to train and certify maintenance personnel will describe maintenance requirements, methods, and procedures for RTA facility equipment and systems. The training program also includes personal protective equipment, emergency equipment, and safety instructions.

Maintenance personnel that are required to operate streetcars (both revenue and non-revenue modes), hi-rail equipment, heavy equipment, or other specialized vehicles/equipment/apparatus and will be certified by both written and practical testing to document the employee's knowledge of safety and operating procedures and skill in the proper and safe operation and procedures. Annually, each employee will be recertified for correctly and safely using the equipment/vehicles, with written and practical testing. Failure to certify will result in an individual's inability to operate the required equipment. Any employee who fails the annual examination may be given special retraining. The Training Manager will administer and maintain all Maintenance training records.

5.1.2.3 Employee Safety Certification Program

Safety training is conducted on all RTA equipment. The SSOC oversees the formulation of the training programs, SOPs, and rules prepared and implemented by the RTA. RTA management will issue operating rules and SOPs to all operating personnel and contractors. The SSOC must approve all respective rules and SOPs.

5.1.2.4 Safety Training

Safety information on approved methods and procedures described in OEM manuals, handbooks, and other best practice documentation will be used to develop certification and training. The training documentation and instruction include identifying protective devices and emergency equipment. Also, as appropriate, safety posters and notices are used to enhance awareness during all phases of system operations. Proficiency demonstrations and certifications are required of all operators and maintenance personnel. Safety concerns are incorporated in briefings given to personnel before working with hardware or facilities. The CSO will review the safety training program at least every six months to ensure training materials and programs remain consistent with the needs of RTA. Recommended modifications will be submitted to SSOC for review and approval.

5.1.2.5 Safety/Industrial Hygiene Training and Education

RTA will train employees in basic safe work practices and hazard identification for all personnel routinely on-site. Employees exposed to chemicals or overexposed to physical agents will receive training in industrial hygiene principles, use and care of personal protective equipment and hazards, and safe handling of chemicals/agents.

5.1.2.6 Emergency Response Personnel Training

Training to familiarize fire, police, and emergency service personnel with special streetcar and facility requirements is coordinated through and conducted by RTA. The CSO coordinates and

develops emergency preparedness and response drills, including multi-agency participation. The training classes, exercises, and after-action reviews are then conducted with emergency service personnel to:

- Ensure the adequacy of emergency plans and procedures
- Ensure readiness of personnel to perform under emergency conditions, and
- Ensure effective coordination between RTA and emergency response personnel and agencies.

After Action reviews that generate improvement, recommendations shall be reviewed by the CSO, and if necessary, a Corrective Action Plan will be established to mitigate the impacts of the recommendations. The SSOC shall review and accept or reject the Correction Action Plan.

5.1.2.7 Assault Awareness Prevention Training

RTA operations, maintenance, and safety personnel will complete de-escalation training developed by the National Transit Institute/Rutgers University annually.

5.1.2.8 Roadway Worker Protection Program

This RTA program prescribes safety standards related to the movement of streetcar roadway maintenance machines where such movements affect the safety of roadway workers. This program has been adopted to prevent collisions and casualties caused by public vehicles, streetcars, or roadway maintenance machines striking roadway workers or maintenance machines.

5.1.3 Third-party Contractor Safety around and within RTA facilities

Construction safety and operations management are privately contracted per City of Detroit procedures. Contractors not part of the construction or operations activities associated with RTA must seek and obtain approval, in writing, from RTA to perform work on or near RTA property and infrastructure. Third parties working under the direction of RTA shall secure a Work Order specifying the scope and duration of activities to be performed. The Maintenance-of-Way shall review all third-party work on and within RTA facilities and approve all means and methods of work.

The Safety Manager must ensure the requesting party abides by the safety requirements established by RTA. Requirements include but are not limited to orange/yellow reflective safety vests, proper hand signaling to streetcar operators, and understanding the inherent dangers of the energized overhead and underground electrical distribution system.

RTA shall require contractors to attend Track Access classes before approval and issuance of an Access Permit. The Safety Manager will plan for contractors to participate in such courses and receive certification before approving and distributing a Track Access permit when necessary.

5.1.4 Record Keeping

The Training Manager maintains personnel records of all employees, contractors, and other third parties, including first responders, training activities at the RTA facility. The Safety Manager will ensure compliance with current certification or non-expired training. Untrained first responders should consult with RTA Management before entering RTA facilities.

5.1.5 Compliance with Training Requirements

The internal audit process includes determining that all necessary training is conducted and documented, including the proper qualification of operating and maintenance personnel. Training materials, testing, and grading processes are evaluated for completeness and accuracy. The Training Manager may not perform or oversee this audit activity.

The audit process is guided by the following criteria related to training compliance:

- Identify training requirements for all safety-related RTA personnel, which encompasses initial and refresher training of procedures, the equipment uses, and manufacturers' training. Also reviewed are retraining requirements identified due to Safety Event investigations, revised or equipment enhancements, and regulatory changes.
- Review all training programs identified for safety adequacy.
- Assess the training program's effectiveness and on-the-job experience by conducting emergency scenarios, drills, audits, and evaluations. These job evaluations are based on job performance, statistical trends, and public feedback.
- Review employee performance, including employee records, and conduct in-person interviews to confirm technical knowledge and issues.
- Evaluate training provided to all personnel and emergency response personnel when substantive operational changes are made or with the introduction of new equipment, facilities, or specialty vehicles

5.2 Safety Communication

The RTA safety communication will be implemented using the following tools to spread information throughout the system:

- Monthly Safety Meetings: Participation in this meeting is mandatory for all operating employees and supervisors. The Safety Manager and the CSO lead this meeting.
- Maintenance safety toolbox: This is a monthly meeting of the maintenance staff to discuss safety issues and present the monthly safety video for maintenance. The supervisor documents these toolbox sessions and provides them to the Safety Manager for retention.
- Job briefings: Every time non-routine work is performed, a job safety briefing is held to discuss the task's hazards. Safety protocols and special tool usage will be discussed and documented. Copies are provided to the Safety Manager for retention.

6 Risk-Based Inspections – Policy and Procedures

RTA and MDOT have consulted and established policies and procedures describing the SSOA's access to RTA to conduct risk-based inspections. These policies and procedures may be found in the MDOT Program Standard and include detailed descriptions of the processes the MDOT will use to conduct inspections of RTA both with and without advance notice.

RTA and MDOT have established clear policies and procedures that describe how MDOT's risk-based inspections will be conducted. These policies and procedures are documented in the MDOT Program Standard and referenced in this ASP. The policies and procedures address:

- Scheduling inspections
- Inspection reports
- Immediate safety concerns

A risk-based inspection program requires collecting and analyzing large sets of complex data and a mechanism for evaluating that data to inform inspection activities. RTA will share safety data with MDOT as required in the Program Standard. This includes the data the SSOA requires and agreed upon in the RBI policies and procedures developed in consultation with MDOT. It will also consist of the data RTA collects when identifying hazards and assessing and mitigating safety risks.

RTA will follow the policies and procedures developed in consultation with MDOT for submitting the data sets to be shared, the processes for sharing each data set, and the frequency at which the data will be shared.

RTA policies and procedures are developed in consultation with the SSOA to provide access to the required data for the SSOA's risk-based inspection program.

7 Risk Reduction Program (RRP)

7.1 Introduction and Purpose

The Risk Reduction Program (RRP) is established as an integral component of the RTA's Safety Management System (SMS) and Public Transportation Agency Safety Plan (PTASP). It addresses the requirements outlined in 49 CFR § 673.11(a)(7). It aligns with the principles and objectives of the Federal Transit Administration's (FTA) National Public Transportation Safety Plan (NPTSP) and the Michigan Department of Transportation's (MDOT) System Safety Program Standard (SSPS).

The primary purpose of this RRP is to proactively improve safety performance across RTA's transit operations by systematically reducing the number and rates of:

- Reportable Safety Events (as defined by FTA and MDOT)
- Injuries to passengers, employees, contractors, and the public
- Assaults on transit workers
- This program utilizes a data-driven, risk-based approach, integrating hazard identification, safety risk management, safety assurance, and safety promotion principles to achieve measurable safety improvements.

7.2 Scope

This RRP applies to all transit operations conducted by RTA, including all modes of service, facilities, equipment, personnel (employees and contractors), and procedures involved in the provision of public transportation service.

7.3 Program Elements

This RRP comprises the following core elements designed to meet regulatory requirements and enhance operational safety:

7.3.1 Element 1: Reduction and Mitigation of Vehicular and Pedestrian Safety Events

- Objective: To reduce the frequency and severity of safety events involving RTA transit vehicles, pedestrians, or other vehicles.
- Methodology (Aligned with 49 CFR 673.25 (SRM) and 673.27 (SA)):
    - Data Collection & Analysis: Continuously collect and analyze vehicular and pedestrian event data. Identify trends, high-risk locations, and contributing factors.
    - Hazard Identification: Utilize the RTA's established SRM process (PTASP Section 3) to identify hazards.
    - Safety Risk Assessment: Assess the identified hazards using the RTA's risk assessment matrix (PTASP Section 3.2). Consideration will be given to factors contributing to visibility impairments for transit vehicle operators, per § 673.25(d)(3).
    - Safety Risk Mitigation: Develop and implement mitigations consistent with § 673.25(d)(3) and the RTA's SRM process. Mitigations may include vehicle modifications or retrofits to reduce visibility impairments or specifications for future vehicle procurements that address visibility.
    - Safety Committee Role: The Joint Labor-Management Safety Committee (JLMSC) will review risk assessments and recommend safety risk mitigations related to vehicular and pedestrian safety for inclusion in this program and the PTASP (§ 673.25(d)(5)).

- Monitoring & Evaluation: Track the effectiveness of implemented mitigations through ongoing data analysis and performance monitoring against established Safety Performance Targets (SPTs) (see 7.3.3).
-

7.3.2 Element 2: Reduction and Mitigation of Assaults on Transit Workers

- Objective: To reduce the frequency and severity of assaults on RTA transit workers while performing their duties.
- Methodology (Aligned with SRM § 673.25 & SA § 673.27):
  - Data Collection & Analysis: Collect and analyze data on worker assaults.
  - Hazard Identification: Utilize the RTA's SRM process (PTASP Section 3) and worker safety reports.
  - Safety Risk Assessment: Assess identified assault-related hazards using the RTA's risk assessment matrix (PTASP Section 3.2).
  - Safety Risk Mitigation: Develop and implement mitigations consistent with § 673.25(d)(4) and the RTA's SRM process. Mitigations may include:
    - De-escalation and Conflict Resolution Training (see 7.3.2.1).
    - Deployment of assault mitigation infrastructure and technology on vehicles and in facilities, such as operator compartment barriers, enhanced communication systems (silent alarms), and high-visibility cameras (§ 673.25(d)(4)).
  - Safety Committee Role: The JLMSC will review risk assessments and recommend safety risk mitigations related to worker assaults for inclusion in this program and the PTASP (§ 673.25(d)(5)).
  - Monitoring & Evaluation: Track the effectiveness of implemented mitigations through ongoing data analysis and performance monitoring against established SPTs (see 7.3.3).

7.3.2.1 De-escalation Training

- RTA commits to providing comprehensive de-escalation and conflict resolution training consistent with § 673.29(a).
- This training will equip employees with techniques to recognize potentially volatile situations.
- Refresher training will be provided annually.
- Funding: RTA recognizes that costs associated with providing de-escalation training for frontline employees are eligible expenses under the Section 5307 Urbanized Area Formula Grant program. RTA will pursue these funds as appropriate to support this critical training initiative.

7.3.3 Element 3: Safety Performance Targets (SPTs) for RRP

- Objective: To establish measurable targets for assessing the effectiveness of the RRP
- Methodology (Aligned with § 673.11(a)(3), § 673.11(a)(7)(iii), § 673.19(d)(2)):
  - Target Setting: The RTA JLMSC, per § 673.19(d)(2), is responsible for setting annual SPTs for the safety risk reduction program performance measures established in the NPTSP.
  - Data Basis: These targets must be set based on a three-year rolling average of RTA's data submitted to the National Transit Database (NTD), where available.
  - Scope: Targets will be set for all applicable modes.
  - NTD Detail Level: Targets will be set based on the level of detail RTA is required to report to the NTD. The JLMSC does not need to set a target until RTA has been required to report three years of corresponding data.
- Coordination: RTA will coordinate SPTs with MDOT and the Southeast Michigan Council of

Governments (SEMCOG).
- Review: SPTs will be reviewed and updated annually (PTASP Section 4.4).

7.3.4 Element 4: Safety Committee Role and Mitigation Integration

- Objective: To formally integrate the JLMSC's recommendations into the RRP and PTASP.
- Methodology (Aligned with § 673.11(a)(7)(iv), § 673.19(d), § 673.25(d)(5)):
    - Mitigation Recommendation: As part of the SRM process applied within Elements 1 and 2 (7.3.1, 7.3.2), the JLMSC will identify and formally recommend safety risk mitigations.
    - PTASP Integration: RTA must include or incorporate by reference these safety risk mitigations recommended by the JLMSC (based on SRM assessments under § 673.25(c)) into this RRP section and the overall PTASP, as required by § 673.11(a)(7)(iv) and § 673.25(d)(5).
    - Accountable Executive Consideration: The Accountable Executive will also receive and must consider all other safety risk mitigations recommended by the JLMSC. Documentation of decisions will be maintained per § 673.31.

7.3.5 Element 5: Monitoring, Continuous Improvement, and Safety Set-Aside

- Objective: To ensure the RRP is effective and continuously improved and meets requirements when SPTs are unmet.
- Methodology (Aligned with Safety Assurance § 673.27):
    - Performance Monitoring: RTA will continuously monitor safety performance against the RRP SPTs set by the JLMSC (§ 673.27(b), § 673.27(d)(2)) (PTASP Section 4).
    - Annual Assessment: The RRP's effectiveness will be assessed annually. Deficiencies in performance against RRP SPTs will be identified (§ 673.27(d)(1)(ii)).
    - Actions if Targets Not Met: If RTA does not meet an established annual RRP SPT set by the JLMSC, RTA must, per § 673.27(d)(3):
        - Assess the associated safety risk using the SRM process (§ 673.25(c)).
        - Mitigate the associated safety risk using the SRM process (§ 673.25(d)), including these mitigations in the PTASP per § 673.25(d)(5).
    - Allocate its Safety Set-Aside (not less than 0.75% of Section 5307 funds, per definition in § 673.5) in the following fiscal year to safety-related projects reasonably likely to help meet the missed target in the future.
- Improvement Plan: Under the direction of the Accountable Executive, RTA will develop and carry out a plan to address any deficiencies identified through the safety performance assessment related to this RRP (§ 673.27(d)(4)).

BOARD OF DIRECTORS MEMORANDUM

TO:	RTA Board of Directors
FROM:	Ben Stupka, Executive Director
SUBJECT:	Public Transportation Agency Safety Plan for Bus Service
DATE:	July 17, 2025
REQUESTED ACTION:	Board of Directors Approval

Approval Request:

This memo requests board approval of the Public Transportation Agency Safety Plan for Bus Service.

Background:

The Public Transportation Agency Safety Plans (PTASP) regulation (49 CFR Part 673) requires operators of public transportation systems that receive federal funds under the FTA Urbanized Area Formula Grants (Section 5307), and rail transit agencies subject to the FTA State Safety Oversight (SSO) program, to develop an Agency Safety Plan (ASP) that includes the processes and procedures to implement a Safety Management System (SMS). SMS is a comprehensive, collaborative, and systematic approach to managing safety.

Attachment E1: RTA PTASP for Bus Service must be approved by the Board of Directors.

Regional Transit Authority
Of Southeast Michigan

Public Transportation Agency Safety Plan for Bus Service

Version 1.0
July 17, 2025

Table of Contents

Transit Agency Information

Agency Name	Regional Transit Authority of Southeast Michigan (RTA)		
Agency Address	1001 Woodward Avenue, Suite 1400, Detroit, MI, 48226		
Urbanized Area Served	Detroit, MI (primary) and Ann Arbor, MI		
Name and Title of Accountable Executive (AE)	Ben Stupka, Executive Director, RTA		
Name of Chief Safety Officer (CSO) or Safety Management System (SMS) Executive	Lyle Dungy, Chief Safety Officer, RTA		
Modes of Service Covered by This Plan	Bus	**List All FTA Funding Types (e.g. 5307)**	5307
Modes of Service Provided by The Transit Agency	Bus, Streetcar	**Does agency provide transit service on behalf of another transit agency or entity?**	YES
Name and Address of Transit Agencies/Entities from Which Service is Provided	Indian Trails 109 East Comstock Street Owosso, Michigan 48867	**Description of Arrangement**	RTA Detroit to Ann Arbor (D2A2) & Detroit Air Xpress (DAX) contracted express bus services. The RTA is a large urbanized area provider as defined by 49 CFR Part 673.

1. Plan Development, Approval, and Updates

Approvals

RTA drafted this Public Transportation Agency Safety Plan (PTASP). The individuals below, submitting and signing this PTASP, verify it was prepared following the appropriate and applicable requirements and guidelines set forth by the Federal Transit Administration (FTA) in their Public Transportation Safety Program, the National Public Transportation Safety Plan, and 49 Code of Federal Regulations (CFR) Parts 670, 673 and others, that they are authorized representatives of the Transit Agency; that their signature attests that all items and conditions contained in this plan are understood, accepted, and approved; and that they are committed to implementing the PTASP and achieving its safety goals and objectives.

REVIEWED BY: _____ _____
Chief Safety Officer *Date*

APPROVED BY: _____ _____
Accountable Executive *Date*

ACCEPTED BY: _____ _____
Bus Safety Committee Chair *Date*

ACCEPTED BY: _____ _____
RTA Board of Directors *Date*

Revision Log

Version No.	Date	Remarks	Authorized Signature
1.0	July 17, 2025	Initial creation of PTASP for contracted bus service	

Annual Review and Update of the PTASP

The CSO, with support from all other employees and contractors, has the primary responsibility of assuring the development, implementation, audit, and annual update of the PTASP with oversight and review by the RTA Bus Safety Committee (BSC). Annual review of the PTASP is mandatory and includes the following:

- By September 1 of each year, the CSO or designee is to be notified in writing of any recommended changes to the PTASP for review and approval by the BSC.

- The review will be completed by December 31 of that year, under the direction of the CSO or designee, to include changes to the organizational structure, new systems or contractors, progress on goals and objectives, and new regulations affecting safety and security.
- The CSO or designee submits the updated PTASP to the BSC for approval and signature of the Accountable Executive.
- The CSO or designee submits the signed PTASP to the Board of Directors for approval.

2. General Annual Safety Performance Targets and Annual Safety Performance Targets for the Safety Risk Reduction Program

According to 49 U.S.C. § 5329(d), the RTA PTASP must include safety performance targets based on the FTA National Public Transportation Safety Plan's safety performance measures. It is the responsibility of RTA Management to track the performance measures discussed in this section. If the performance measures are not met, it is the responsibility of RTA to use its resources to assess the situation and determine the root cause. Once the root cause has been determined, corrective actions are developed to mitigate the problem after review and approval by the BSC.

All RTA employees and contractors are responsible for following all rules and procedures established by management to achieve the performance measures set in this document.

General Annual Safety Performance Targets and Annual Safety Performance Targets for the Safety Risk Reduction Program***

Mode of Transit Service	Fixed-route bus	Defined by the high-level modal groups: rail, fixed-route bus, and non-fixed-route bus.
Major Events (Total)	6	A collision, derailment, fire, hazardous material spill, act of nature (Act of God), evacuation, or Other Safety Occurrence not Otherwise Classified (OSONOC) occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds. Or, an occurrence of a bomb threat, bombing, arson, hijacking, sabotage, cyber security event, assault, robbery, rape, burglary, suicide, attempted suicide (not involving a transit vehicle), larceny, theft, vandalism, homicide, CBR (chemical/biological/radiological) or nuclear release, or other event (*NTD*).
Major Events (Rate*)	1.5	Based on safety and security major events as defined by the NTD, divided by vehicle revenue miles (VRM).
Collisions (total)	25	Based on collisions reported to the NTD, defined as a vehicle/vessel accident in which there is an impact of a transit vehicle/vessel with another transit vehicle, non-transit vehicle,

		fixed object, person(s) (suicide/attempted suicide included), animal, rail vehicle, vessel, or dock (*NTD*).
Collisions (Rate*)	6.25	Based on collisions reported to the NTD, divided by VRM.
Pedestrian Collision (Rate*)	0.25	Based on collisions "with a person" as defined by the NTD, divided by VRM.
Vehicular Collision (Rate*)	1.25	Based on collisions "with a motor vehicle" as defined by the NTD, divided by VRM.
Fatalities (Total)	1	A death or suicide confirmed within 30 days of a reported event. Does not include deaths in or on transit property that are a result of illness or other natural causes (*NTD*).
Fatalities (Rate*)	0.25	Based on fatalities as defined by the NTD, divided by VRM.
Transit Worker Fatality (Rate*)	0.25	Based on transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.
Injuries (Total)	5	Any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene (*NTD*).
Injuries (Rate*)	1.25	Based on injuries as defined by the NTD, divided by VRM.
Transit Worker Injury (Rate*)	1.5	Based on transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.
Assaults on Transit Workers (total)	1	Based on a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker *(NTD).*
Assaults on Transit Workers (Rate*)	0.25	Based on assaults on transit workers as defined by the NTD, divided by VRM.
System Reliability**	65,000	The mean distance between major mechanical system failures where some mechanical element of the revenue vehicle prevents the vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns *(NTD*).

*Rates are per 1 million vehicle revenue miles

**Rates are distance (VRM) operated over a year divided by number of major mechanical system failures over a year

****Note on Data Availability and NTD Reporting: The contracted bus service provider has provided safety performance data to NTD for one transit service beginning in October of 2024. RTA will be compliant with the 3-year reporting guidance in FY2028 for all the transit services. Data limitations have been considered when developing performance targets.*

3. Safety Performance Target Coordination with Metropolitan, Statewide, and Non-Metropolitan Planning Processes

RTA coordinates with the Southeast Michigan Council of Governments (SEMCOG), the metropolitan planning organization, in setting regional safety targets annually. The RTA and other regional transit providers share their respective safety targets with SEMCOG, which uses this information to analyze trends and establish annual regional safety targets.

Targets were last transmitted to MDOT on: _____
Date

Targets were last transmitted to SEMCOG on: _____
Date

4. Safety Risk Reduction Program

RTA's Risk Management Reduction Program aims to fulfill the following requirements:

- The reduction and mitigation of vehicular and pedestrian safety events involving transit vehicles, including mitigations consistent with § 673.25(d)(3).
- The reduction and mitigation of assaults on transit workers, including mitigations consistent with § 673.25(d)(4).
- The safety risk mitigations identified and recommended by the Safety Committee based on a safety risk assessment for the safety risk reduction program are included or incorporated by reference in the PTASP.

When identifying safety risk mitigation, RTA will address performance shortfalls. RTA and its BSC will consider the following mitigations:

- *Vehicle and pedestrian safety events:* reduce visibility impairments for transit vehicle operators that contribute to accidents, including retrofits to vehicles in revenue service and specifications for future procurements that reduce visibility impairments.
- *Assaults on transit workers:* consider the deployment of assault mitigation infrastructure and technology on transit vehicles and in transit facilities, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators.

All mitigation measures identified through the Safety Risk Assessment process and recommended by the BSC are either included directly in the PTASP or incorporated by reference as part of the safety risk reduction program. The key elements of RTA's safety risk

reduction program include hazard identification, safety risk assessment, and safety risk mitigation.

5. Safety Committee Establishment, Membership, and Procedures

The BSC was established based on the size, scope, and complexity of RTA. The committee was convened by a joint labor-management process and consists of an equal number of frontline transit workers and management representatives to ensure all hazards are identified. The committee includes frontline transit workers from major transit service functions across the transit system, including operations and maintenance. The chair of the committee was designated by the RTA, and the additional management representative and the frontline worker representatives were designated by the contractor. A non-voting observer was also selected by the RTA.

BSC members will consult technical experts, tools, agency information, and resources, including other transit workers, to serve in an advisory capacity, as needed. Additionally, the committee will be provided with access to submissions to the transit worker safety reporting program to support deliberations. BSC members will also be required to take annual training on the PTASP. The BSC is responsible for the following directives:

- Reviewing and approving the PTASP and any updates before approval by the Board of Directors.
- Setting annual safety performance targets for the safety risk reduction program.
- Identifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit agency's safety risk assessment, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.
- Identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.
- Identifying safety deficiencies for purposes of continuous improvement, including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

The BSC will publish committee meeting notices, agendas, minutes and hazard logs publicly to inform employees of BSC activities. The committee will reach decisions through a majority of votes and record decisions in meeting minutes. Coordination and communication with RTA's Board of Directors and the Accountable Executive will be on an as needed basis.

In the event of a dispute within the BSC, the committee will come to a resolution using a neutral internal mediator. Julia Roberts (RTA) has been designated to serve in this mediating role.

Committee members will be compensated for participation in BSC meetings. Employees who serve on the committee will be paid at their standard hourly rate or regular salary, consistent with their current employment classification and pay schedule.

6. Safety Management System

In accordance with 49 CFR §673.21, RTA has established and implemented a safety management system (SMS). The SMS is appropriately scaled to the size, scope, and complexity of RTA and includes the following SMS components: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion.

7. Safety Management Policy

Safety Management Policy Statement

RTA is the party responsible for the management of contracted bus operations in Southeast Michigan. As such, the RTA is committed to providing safe, secure, and efficient transportation services. The RTA does so by creating a collective awareness, understanding, involvement in, and commitment among all RTA employees and contractor employees to ensure the security of passengers, employees, property, and the public in the RTA service area. To ensure safety and performance accountability, RTA establishes the following safety objectives:

- Maintain a culture of safety for all employees and contractors
- Track and meet safety performance targets established through the FTA National Safety Plan's safety performance measures
- Address, mitigate, and implement targets or concerns outlined in the safety risk management program
- Monitor and measure safety performance to support continued improvement.
- Promote a safety-first environment through training and communication.

All employees and contractors are responsible for the safety of passengers, employees, property, and those who encounter RTA services. Specific accountability for safety performance rests with those responsible for managing each function or location. Ultimately, the Accountable Executive is accountable for the safety of the system.

RTA management will review the safety program's effectiveness and provide resources to correct deficiencies. It will work with the Michigan Department of Transportation and other agencies involved in safety oversight to achieve the safest and highest quality system possible. The CSO or designee will be responsible for distributing this Safety policy to every employee and contractor working for the RTA. All employees and contractors are responsible for understanding and implementing this policy to the best of their abilities.

The CSO or designee, under the direction of the Accountable Executive, is tasked to devise, implement, and administer a comprehensive, integrated, and coordinated PTASP, with a specific safety plan identifying activities to prevent, eliminate, control, reduce hazards (unsafe acts or unsafe conditions), or the potential consequences of the hazards that may

occur during the operations of any system under the jurisdiction of the RTA. Management of hazards includes the legitimate right to coordinate with the affected manager to stop unsafe operations when hazards that pose an imminent danger to life or property are thought to exist. The CSO or designee will oversee all safety risk management activities with support from all personnel.

To support the CSO, RTA has established a BSC to support the development, implementation, audit, and annual update of the PTASP, as well as supporting safety related concerns.

It is the policy of the RTA to fully support an ongoing safety program in which preventive concepts are utilized in identifying and resolving hazards; however, the success of the Safety Program depends on the sincere and cooperative efforts of all contractors and RTA employees. Therefore, each RTA employee and contractor is responsible for actively participating in the safety process, providing requested information, and supporting and aiding in any investigations and their outcomes.

_____ _____

Ben Stupka *Date*
Executive Director and Accountable Executive
Regional Transit Authority of Southeast Michigan

Safety Management Policy Communication

Communications will include, but not be limited to:

- Initial Onboarding Training
- Refresher/Retraining (annually and as needed basis)
- Staff Meetings
- Safety/Driver Meetings
- Bulletins/Memos
- TV Displays
- Emails to staff
- Contractor Drug & Alcohol Policy
- Training Materials

Authorities, Accountabilities, and Responsibilities for Management of Safety

Accountable Executive:

- The Accountable Executive is the single, identifiable person who has ultimate responsibility and accountability for implementing and maintaining the RTA's SMS and PTASP. This is the same person responsible for carrying out the RTA's Transit Asset Management (TAM) Plan. The Accountable Executive has control over the capital and human resources needed to develop and maintain both the PTASP and TAM Plan. The Accountable Executive is also responsible for ensuring action is taken, as necessary, to address substandard performance in the SMS. This individual is the primary decision-maker who is ultimately responsible for both safety and TAM Plan.

In accordance with 49 CFR §673.23(d)(1)(i), the Accountable Executive is responsible for ensuring that all safety risk mitigations identified in the RTA's Safety Reduction Program are implemented. The Accountable Executive also receives and considers all other safety risk mitigation recommendations recommended by the BSC.

The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the RTA's safety performance cannot be delegated and always rests with the Accountable Executive. Specific accountability for safety performance rests with those responsible for managing each function or location. Ultimately, the Accountable Executive is accountable for the safety of the system.

Chief Safety Officer or Safety Management System (SMS) Executive:

The Chief Safety Officer (CSO) role is responsible for overseeing and implementing the RTA PTASP. Reporting directly to the Accountable Executive, this position is responsible for developing and implementing the PTASP as established in 49 CFR 673 and 674. The CSO has the authority and responsibility for day-to-day implementation and operation of the SMS. Additionally, the CSO or designee serves as the Chair of the Bus Safety Committee and is an adequately trained individual who has responsibility for safety. The CSO will not act in any other operational or maintenance capacity.

The Chief Safety Officer or designee is responsible for:

- Coordinating the development, implementation, audit, and update of the RTA PTASP under 49 CFR 674.
- Identifying substandard performance in the RTA's contracted SMS and developing action plans for approval of the Accountable Executive.
- Providing Safety Risk Management (SRM) expertise and support for other RTA personnel who conduct and oversee Safety Assurance activities.
- Conducting Hazard Risk Analysis and reviewing proposed risk ratings for new safety hazards
- Monitoring various safety logs including Hazard, Corrective Action Plan, Accident/Incident, Occurrence, Unusual Occurrences.

Agency Leadership and Executive Management:

Julia Roberts, Planning and Innovation (P&I) Director, or designee, is responsible for oversight of all contracted transit services and will support the efforts and responsibilities of the Accountable Executive and CSO.

Stace Babcock, Safety Manager, is responsible for overseeing safety coordination between the RTA and contracted transit service.

Key Staff:

In addition to the above RTA positions, the Contractor has designated a Transit Contractor Executive as their safety-related point of contact with the RTA's CSO or designee, as well as an SMS Manager responsible for carrying out the day-to-day safety-related activities for the contracted services. Refer to the attached Appendix A for details on the safety roles and responsibilities of each Transit Contractor.

Bus Safety Committee:

The following members and roles will contribute to the BSC which meets regularly to fulfill its responsibilities:

Chair – CSO designee, Stace Babcock, Safety Manager, RTA

Contractor Oversight – P&I Director designee, Mshadoni Smith-Jackson, Planning Manager, RTA (non-voting)

SMS Manager – Ray Ruddy, Safety Director, Indian Trails

Frontline Staff – Mechanic, Indian Trails

Frontline Staff – Motor Coach Operator, Indian Trails

Transit Worker Safety Reporting Program

RTA requires its contractor to implement an Employee Safety Reporting Program that:

- Allows transit workers to report safety concerns to senior management
- Includes reporting assaults on transit workers, near-misses, and unsafe acts and conditions
- Encourages employees to report any safety-related situation

- Emphasizes benefits for safety, not safety record
- Establishes clear guidelines for unacceptable behavior
- Balances learning and accountability
- Establishes several methods for employees to report safety issues.

The Contractor's employee safety reporting system's guidelines are in the Indian Trails Safety Accident and Incident Reporting Program. Self-reporting is not an out-of-jail-free card; it is a restorative process that focuses on identifying mistakes made in good faith and providing re-education on safe practices, rather than doling punitive actions.

The following table presents a guideline for assessing intent in cases of safety events:

Human Error	At-Risk Behavior	Reckless Behavior
An inadvertent action – slip, lapse, mistake	A choice – a risk not recognized or believed to be justified	Conscious disregard of unreasonable risk
Managed through: • Processes and procedures • Checklists • Trainings	Managed through: • Increased situational awareness • Removing incentives for at-risk behavior • Creating incentives for safe behavior	Managed through: • Remedial action • Punitive action

Further discussion on employee safety reporting for contracted services may be found in Appendix A.

8. Safety Risk Management

Hazard Identification

Identifying hazards is the responsibility of all departments and is the key to system safety. Safety hazard identification encompasses a set of methodologies that first search throughout the system for anything with potential physical and occupational harm. The RTA CSO or designee shall review all risks that are identified. Identified risks are analyzed for severity, likelihood, and cost feasibility of remedial action required to eliminate or reduce the hazard to the lowest practical level.

Hazards can be identified in several ways, such as:

- Accidents, Incidents, and System Reliability and Failure Reports
- Ride Checks and Proficiency Checks
- System Inspections
- Internal, FTA, or MDOT Audits and Regulatory Inspections
- Data and information provided by FTA or MDOT
- Data and information regarding exposure to infectious disease provided by the Centers for Disease Control and Prevention (CDC) or Michigan Department of Health & Human Services
- Customer, Contractor, and Employee Complaints
- Safety Committee
- Transit Industry Experience
- Employee Safety Reporting
- Occupational task review
- Safety concerns identified through Safety Assurance activities carried out under § 673.27

The Accountable Executive is responsible for allocating resources necessary to mitigate safety and security hazards, or the potential consequences of the hazards. The RTA Contractor will use a hazard identification and analysis process before purchasing and accepting new equipment and modifying existing facilities, systems rolling stock, and infrastructure elements. These modifications will be reviewed by the BSC before implementation.

Safety Risk Assessment

Hazard Risk Assessment is a semi-quantitative calculation based on mostly subjective judgments used to determine the risk associated with each hazard and, thus, the urgency for implementing corrective measures to eliminate or reduce risks to an acceptable level. Risk Assessment is comprised of evaluating hazard severity (categorizing the hazard) and estimating hazard likelihood. The factors considered in this analysis include system safety, schedule, existing safety risk mitigations, and the impact on the public’s perception of the system's safety.

Hazard Severity

Description	Severity Category	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 M.
Critical	2	Could result in one or more of the following: Permanent or 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 M but less than $10 M.
Significant	3	Could result in one or more of the following: Injury or occupational illness resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding $100 K but less than $1 M.
Marginal	4	Could result in one or more of the following: Injury or occupational illness not resulting in a lost workday, minimal environmental impact, or monetary loss less than $100 K.

Hazard Likelihood

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 that 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

Risk Assessment Matrix

	Catastrophic	Critical	Significant	Marginal
Frequent	High	High	Serious	Medium
Probable	High	High	Serious	Medium
Occasional	High	Serious	Medium	Low
Remote	Serious	Medium	Medium	Low
Improbable	Medium	Medium	Medium	Low
Eliminated	N/A	N/A	N/A	N/A

Safety Risk Mitigation

The Safety Risk Mitigation process utilizes the output of the Safety Risk Assessment process. The objectives of this process are to:

- Identify areas where hazard resolution requires a change in the system design, installation of safety devices, or development of special procedures
- Verify hazards involving interfaces between two or more systems have been resolved
- Verify the resolution of a hazard in one system does not create a new risk in another system

The RTA will use the following methodologies to meet system safety and security objectives by eliminating, mitigating, or controlling hazards. These controls are implemented throughout procurement and operations of service to reduce the likelihood and severity of potential risk consequences:

- Design out hazards or design to minimize hazard severity to the extent permitted by cost and practicality. Identified risks are eliminated or controlled by equipment, systems, and facilities design.
- Develop mitigating provisions for hazards that cannot reasonably be eliminated or controlled through design to an acceptable level using fixed, automatic, or other protective safety design features or devices. Provisions are made for a periodic performance of functional checks of safety devices and employees' training to meet system safety objectives.
- When design, training, or safety devices cannot reasonably nor effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons to the risk.
- Where it is impossible to reasonably eliminate or adequately control a hazard through design, safety, and warning devices, procedures, and training are used to manage the risk. Cautionary notations are standardized for all persons involved, and safety-critical issues will require authorized personnel certification.

RTA will also consider guidance provided by MDOT, FTA, the CDC, and State health authority.

The review process of the mitigating action consists of the following:

- The Contractor SMS Manager or any other manager/personnel will identify proposed mitigation actions to eliminate or control each identified risk and submit it to the CSO or designee.
- The CSO or designee will evaluate the proposed mitigating actions and evaluate them.
- The CSO or designee will convene the BSC to evaluate the mitigating action.
- If the BSC approves the mitigating action (a majority of votes), the CSO or designee will inform the Accountable Executive of the determination of whether the hazard is adequately controlled or mitigated
- The CSO or designee will evaluate the residual risk, based on those mitigating actions, to assess the potential effectiveness,
- The mitigating action will be submitted to the Accountable Executive.
- If the mitigation proves unsuccessful, the CSO or designee will reconvene the BSC to review the unsuccessful mitigation and facilitate the development of an alternate mitigation method.

RTA will review and approve the Contractors' hazard identification and mitigation program. Once mitigations are agreed by RTA and the Contractors for identified hazards, mitigations are tracked through the safety risk management program to ensure all concerns raised have been addressed, mitigated, and implemented. Hazard tracking may be done through reports, logs, worksheets and/or similar methods that allow for updating if changes occur that impact the findings of the safety analysis.

When the BSC recommends a safety risk mitigation unrelated to the safety risk reduction program and the Accountable Executive decides not to implement the safety risk mitigation, the Accountable Executive prepares a written statement explaining their decision and submits and presents it to the transit agency's BSC and/or Board of Directors.

RTA audits and provides oversight to the Contractor to confirm the Contractors manage safety risk at an acceptable level to RTA. Refer to the attached appendices for details on how hazards are captured and tracked by the Contractor.

9. Safety Assurance

Safety Performance Monitoring and Measurement

Monitor the system for compliance with procedures for operations and maintenance:

Activities include, but not are not limited to, pre- and post-trip inspections of equipment, maintenance service program that requires service every 10k miles on all equipment along with general inspections by maintenance staff between every trip, annual MVRs for all drivers and other safety-sensitive employees, Federal Motor Carrier Safety Administration (FMCSA) Clearing House use for regulated testing, electronic logs via ELD's for drivers, tracking and reminders of all expiration dates for licensing and testing, and all internal reporting systems for accidents and incidents.

Monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended:

Activities include, but are not limited to, regular monitoring of all onboard and facility security cameras, GPS/Electronic Logging Devices (ELD) systems on the buses, performance reviews or counseling sessions with employees, other general feedback from employees, feedback from customers/passengers, claims reviews with insurance companies, OSHA audits, state and/or federal audits, MDOT annual equipment inspections.

Conduct investigations of safety events, including the identification of causal factors:

Activities include review of all on-board electronic surveillance and safety systems on the motorcoaches (security cameras and electronic-logging/GPS devices), facility security cameras, reports from those involved, interviews with those involved, event or incident reviews by managerial staff and/or committees assigned, insurance investigations or reviews, driver ride-alongs, refresher training, performance evaluations, employee counseling, and anonymous suggestion or input boxes.

Monitor information reported through internal safety reporting programs:

Activities include, but are not limited to, routine monitoring of all onboard and facility security cameras, monitoring of GPS systems, routine discussions or interviews with staff, ride-alongs with drivers, performance reviews and/or counseling sessions with employees, anonymous feedback through supervisors and also suggestion/feedback boxes, and feedback from customers/passengers.

The safety risk mitigation measures will be monitored through the BSC meetings.

Management of Change

Additions, modifications, or deletions to SOPs and the existing configuration of presently operating facilities, fleet, and equipment directly related to operation on contracted service are approved by the RTA BSC. These reviews are established to ensure system and operational

changes are approved before implementation, and that all relevant documentation including training programs, are updated to reflect these changes.

Upon approving any system or operations change, Indian Trails transit contractor will create a Special Instruction or a new or revised SOP to advise affected employees. Contractor supervisors will distribute new control documents during targeted training to employees, ensuring they understand the operational change as it applies to their jobs.

Please refer to Indian Trails Change Control Configuration Management SOP for specific details.

Continuous Improvement

Continuous improvement is measured through monitoring RTA safety performance indicators. These objectives are achieved by applying internal evaluations and independent audits of the SMS. Compliance with this requirement is indicated when:

- The RTA BSC has the necessary authority to make decisions related to the improvement and effectiveness of the SMS or
- The RTA SMS is periodically reviewed for improvements in safety performance.

This element is satisfied when the organization routinely monitors the SMS performance to identify potential areas of improvement. The outcomes of this process lead to improvements to the safety management system.

Best practices for continuous improvement include:

- Incorporating lessons learned into the policy and procedures
- Benchmarking the RTA's SMS against other organizations and actively promoting SMS within the transportation industry
- Seeking out and embracing best practices of other organizations
- Regularly carrying out and acting upon surveys and assessments of organizational culture
- Requiring contractors to follow, participate in, and share information related to the RTA's SMS

Annual review and updates cycles, internal and external audits, and comments from MDOT, FTA, and other regulatory compliance agencies also contribute to continuous improvement.

Additionally, under the direction of the Accountable Executive, RTA will develop and carry out plan(s) to address any deficiencies identified through the safety performance process, including deficiencies in the SMS and the agency's performance against its safety performance targets. The agency's performance will be identified and compared against the annual safety performance targets set by the BSC for the safety risk reduction program. Monitoring activities include a quarterly review of the safety performance targets. If established annual safety performance targets set by the BSC are not met, RTA will assess the associated safety risk through its safety hazard risk assessment process to determine the revised action, then mitigate the safety risk using its safety risk mitigation process and follow up to ensure the revised action is met.

RTA will allocate its safety set-aside in the following fiscal year to safety-related projects eligible under 49 U.S.C. 5307 that are reasonably likely to help it meet missed safety performance target(s) for the safety risk reduction program in the future.

10. Safety Promotion

Competencies and Training

Safety training is conducted on all RTA Contractor equipment. The BSC oversees the formulation of the training programs, SOPs, and rules prepared and implemented by the RTA. Management of RTA will issue operating rules and SOPs to all operating personnel and contractors, including all operations transit workers, maintenance transit workers, and transit workers directly responsible for safety. The BSC must approve all respective rules and SOPs.

Periodically, reviews and oversight activities associated with the program are completed. Activities or functions judged to be safety-critical may require special training or certification. Refresher training is accomplished at least annually for operations and maintenance employees and when situations related to employee performance warrant it. Documentation of training is kept up to date. The RTA Contractor provides the following training:

- Operating Personnel Training
- Maintenance Personnel Training
- Safety Training
- Safety/Industrial Hygiene Training and Education
- Emergency Response Personnel Training
- Assault Awareness and Prevention Training
- De-escalation Training
- Safety Concern Identification and Reporting Training

Additional competencies and trainings pertaining to contracted transit service are provided in Appendix A.

Safety Communication

The RTA effectively communicates safety and safety performance information throughout the RTA and to its contracted transit services using the following methods:

- Monthly Safety Meetings: Participation in this meeting is mandatory for operating employees and/or supervisors. The Contractor SMS Manager leads this meeting. Hazard and safety risks relevant to transit workers' roles and responsibilities are identified. Safety actions taken in response to reports submitted through the transit worker safety reporting program may be noted in this meeting. Additionally, results of relevant activities for employees and supervisors will be shared with the BSC.
- Job briefings: Every time non-routine work is performed, a job safety briefing is held to discuss the task's hazards. Safety protocols and special tool usage will be discussed and documented. Copies are provided to the RTA Safety Manager for retention. Hazard and safety risks relevant to transit workers' roles and responsibilities are identified.
- For contracted transit service:
    - Initial Onboarding and Refresher Training/Materials
    - Company Handbook
    - Drug and Alcohol Policy
    - Electronic Logging Devices/GPS (through reports generated to mgmt.)

- TV Displays
- Bulletins/Memos/Emails to employees
- Driver/Safety Meetings
- Employee Evaluations and Counseling Sessions (including written reports)
- Insurance and Equipment Manufacturer-Provided Videos
- Insurance Claims Reporting and Analysis
- FMCSA - SMS Scorecards
- Driver Ride-Alongs
- Anonymous Suggestion and Reporting “Boxes”

11. Additional Information

Supporting Documentation

The following supporting documentation has been referenced in this document:

- Indian Trails Accident and Incident Reporting Program
- Indian Trails Change Control Configuration Management

Safety Plan Documentation and Recordkeeping

In accordance with 49 CFR § 673.31, the RTA will maintain all documents that are set forth in this PTASP, including those related to SMS implementation and results. These documents will be maintained for a minimum of three years after they are created and will be made available upon request to the FTA or other Federal or State agency with jurisdiction.

Definitions of Terms

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

Assault on a Transit Worker: As defined under 49 U.S.C. 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker.

Bus Safety Committee: The formal joint labor-management committee on issues related to bus safety that is required by 49 U.S.C. 5329 and 49 CFR Part 673.

CDC: The Centers for Disease Control and Prevention of the United States Department of Health and Human Services.

Chief Safety Officer: 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.

Emergency: As defined under 49 U.S.C. 5324, a natural disaster affecting a wide area (such as a flood, hurricane, tidal wave, earthquake, severe storm, or landslide) or a catastrophic failure from any external cause, as a result of which the Governor of a State has declared an emergency and the Secretary has concurred; or the President has declared a major disaster under section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5170).

Fixed Route Services: Services provided on a repetitive, fixed schedule basis along a specific route with vehicles stopping to pick up and deliver passengers to specific locations; each fixed route trip serves that same origins and destinations.

FTA: The Federal Transit Administration, an operating administration within the United States Department of Transportation.

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

Injury: Any harm to persons as a result of an event that requires immediate medical attention away from the scene.

Investigation: The process of determining the causal and contributing factors of a safety event or hazard, for the purpose of preventing recurrence and mitigating safety risk.

Joint Labor-Management Process: A formal approach to discuss topics affecting transit workers and the public transportation system.

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

Near-miss: A narrowly avoided safety event.

Performance Measure: 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.

Potential Consequence: The effect of a hazard.

Public Transporation: As defined under 49 U.S.C. 5302, regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and does not include: Intercity passenger rail transportation provided by the entity described in 49 U.S.C. chapter 243 (or a successor to such entity); Intercity bus service; Charter bus service; School bus service; Sightseeing service; Courtesy shuttle service for patrons of one or more specific establishments; or Intra-terminal or intra-facility shuttle services.

Public Transportation Agency Safety Plan: The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and 49 CFR Part 673.

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

Safety Event: An unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

Safety Management Policy: A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities for the management of safety.

Safety Management System (SMS): The formal, 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 hazards and safety risk.

Safety Management System (SMS) Executive: A Chief Safety Officer or an equivalent.

Safety Performance Target: A quantifiable level of performance or condition, expressed as a value for the measure, related to safety management activities, to be achieved within a specified time period.

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

Safety Risk: The composite of predicted severity and likelihood of a potential consequence of a hazard.

Safety Risk Assessment: The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risk.

Safety Risk Management: A process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating the safety risk of their potential consequences.

Safety Risk Mitigation: A method or methods to eliminate or reduce the severity and/or likelihood of a potential consequence of a hazard.

Safety Set-Aside: The allocation of not less than 0.75 percent of assistance received by a large urbanized area provider under 49 U.S.C. 5307 to safety-related projects eligible under 49 U.S.C. 5307.

State: 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: A condition in which a capital asset is able to operate at a full level of performance.

Transit Agency: An operator of a public transportation system that is a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 or a rail transit agency.

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

Transit Worker: means any employee, contractor, or volunteer working on behalf of the transit agency.

Urbanized Area: As defined under 49 U.S.C. 5302, an area encompassing a population of 50,000 or more that has been defined and designated in the most recent decennial census as an urban area by the Secretary of Commerce.

Definitions of Acronyms

ADA: Americans with Disabilities Act

AE: Accountable Executive

BSC: RTA Bus Safety Committee

CCMP: Change Configuration Management Program

CSO: Chief Safety Officer

ELD: Electronic Logging Device

ESC: Executive Safety Committee

FMCSA: Federal Motor Carrier Safety Administration

FTA: Federal Transit Administration

MDOT: Michigan Department of Transportation

OEM: Original Equipment Manufacturer

OSHA: Occupational Safety and Health Administration

P&I: Planning and Innovation

PTASP: Public Transportation Agency Safety Plan

RTA: Regional Transit Authority of Southeast Michigan

SD: Safety Director

SEMCOG: Southeast Michigan Council of Governments

SMS: Safety Management System

SOP: Standard Operating Procedure

TAM: Transit Asset Management

TrAMS: Transit Award Management System

VRM: Vehicle Revenue Miles

12. Contractor Appendix A: Indian Trails

Contracted Service Description

Under its contracts with the RTA, Indian Trails provides fixed-route express bus service, Detroit to Ann Arbor (D2A2) and Detroit Air Xpress (DAX). One garage is operated and serviced at the Indian Trails facility in Romulus, Michigan. Indian Trails provides the buses, as well as maintains and holds the liability insurance on the vehicles..

The D2A2 express commuter bus service connects Detroit and Ann Arbor, Michigan. This service provides hourly trips on average between the two communities for 16 round trips a day during the week (6:00 a.m. - 11:00 p.m.) and limited service on Saturday and Sunday. The number of buses that run the D2A2 route varies by day and time of year. This service also uses approximately up to three 45' Prevost H3-45 buses.

The DAX pilot express bus service runs between Downtown Detroit and Detroit Metro Airport (DTW). The service provides hourly trips on average, running seven days a week, 365 days a year, for 16 round trips a day (3:30a.m. - 11:00 p.m.). The number of buses that run the DAX route varies by day and time of year. This service uses up to three 45' Prevost H3-45 buses a day.

Safety Roles & Responsibilities

The positions below are responsible for safety at Indian Trails:

Indian Trails Transit Contractor Executive: Chad Cushman

Indian Trails Transit Contractor Safety Director: Raymond Ruddy

Indian Trails Transit Contractor VP Operations/Maintenance: Jeff Hutchinson

Indian Trails Transit Contractor Operations Manager: Pat Goodsell

In addition, Indian Trails has a Safety Solutions Team at its local level that meets once per month to discuss safety priorities, safety issues, and hazard management, and to communicate safety-related information across all departments. Each location's Safety Representative participates in the Safety Solutions Team. Indian Trails Region Safety Representatives also conduct regular internal reviews of local operations using a risk-based Location Safety Review.

Indian Trails also hosts routine Executive Safety Meetings and posts minutes from each meeting at each location:

Employee Safety Reporting Program

Indian Trails Transit Contractor provides employees an anonymous safety reporting channel through reporting boxes, email, or in person reporting. All employees are encouraged to report any safety-related hazards, incidents, accidents, assaults on transit workers, near-misses, unsafe acts, unsafe conditions or other potential issues directly to their immediate supervisor. Anonymity is maintained for any employee reporting safety concerns.

Indian Trails' corporate safety management policy establishes that Indian Trails will not retaliate against nor impose any other form of retribution on any employee because of their good faith reporting of a safety issues/concern, another person's suspected violation of company policies or guidelines, and any alleged violations of federal, state, or local laws. If the circumstances and the offense charged, in Indian Trails' judgement, present a potential risk to the safety and/or security of its customers, employees, premises and/or property, such events may result in disciplinary or other appropriate action to the extent permitted by applicable law.

All incidents or accidents are reported through Indian Trails' 24-hour dispatch system. The dispatcher will complete a formal report and distribute it electronically to all appropriate department managers, including the Safety Director. At the time of the reporting, the dispatcher will also contact appropriate local, or state authorities as needed.

The dispatcher will also file formal reports or claims with insurance companies when required. The completed reports, along with any additional notes, are posted for viewing by all parties and any follow up photos, videos, reports, witness statements, police/fire reports, or other documentation are included in a Dropbox file link for one click access to all related files and reports.

After investigations of each accident or incident are completed, any necessary training, disciplinary action, or corrective measures are conducted with the employee involved. All pertinent files, documents, reports, etc. are stored for future reference.

Hazard Identification & Tracking

Indian Trails Transit Contractor identifies hazards through multiple channels, including but not limited to:

- Accident and incident reporting and investigations
- Electronic surveillance, including video cameras and GPS tracking systems
- Anonymous employee reporting of potential or visible hazards
- Safety and training/refresher training meetings
- Federal and state regulatory audits
- Insurance audits
- Industry meetings and data (including Bus Industry Safety Council – BISC)
- Daily employee check-in procedures and reasonable suspicion
- Vehicle maintenance program
- Driver ride-alongs

- Passenger feedback

Safety Training Program

Indian Trails Transit Contractor provides training in multiple areas and through multiple channels, including but not limited to:

- Behind-the-wheel and classroom training for new operators
- Ongoing and/or refresher training
- Pre-trip and post-trip inspections training
- Wheelchair lift operation and other ADA-related training
- Training on electronic logging devices (ELDs) and other on-board equipment systems
- Driver ride-alongs
- Lifting and other health-safety related techniques
- Drug and Alcohol awareness
- Distracted driving
- Fatigue and Sleep Apnea awareness
- Emergency response procedures
- OSHA training for all maintenance personnel, including MSDS and PPE training
- Industry-specific and insurance-related safety videos

Indian Trails Transit Contractor maintains the following safety-related documents:

- Company Handbook
- Driver Training Manual
- Saucon Electronic Driver Logs Training Manual
- Drug and Alcohol Policy
- OSHA Sheets
- Bulletins

13. Indian Trails Accident and Incident Reporting Program

OVERVIEW

The primary responsibility for transit safety rests with supervisors and managers; however, safety is everyone's concern. Indian Trails will not take disciplinary action against any employee who discloses a hazard, incident, or occurrence involving safety. This policy shall not apply to information from a source other than the employee, contractor, or vendor involving an illegal act or a deliberate or willful disregard of promulgated policies or procedures.

PURPOSE

Indian Trails is committed to continuously improving workplace safety by encouraging staff to report safety hazards and near-miss events without fear of reprisal to mitigate safety risks.

SCOPE

This policy applies to all Indian Trail personnel, contractors, and vendors.

PROCEDURES

I. Indian Trails will establish an employee safety reporting program to provide staff with a streamlined method of communicating both Preventable and Non-preventable Major Accidents, Minor Accidents, Incidents and other safety concerns that are non-punitive, flexible, and easy to access, providing timely and accessible feedback.

II. Staff participating in this program are ensured that no action will be taken against anyone who discloses a safety concern unless the disclosure indicates an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

III. Following the steps in this policy will:
    a. Promote an open workplace safety culture.
    b. Employ a systematic approach to report safety issues for all Operations, Maintenance, Administration, and Safety/Security staff.
    c. Provide an opportunity to understand operational concerns and hazards through hazard identification and analysis.
    d. Utilize the information to implement reforms as appropriate or necessary to prevent or reduce future risk or reoccurrence.
    e. Support management's objectives of establishing a safety reporting culture to identify and control hazards, reduce safety risks, and prevent harmful incidents.

IV. All Safety Sensitive Employees involved in Preventable and Non-Preventable Accidents or Incidents are to report them immediately at the time of occurrence to the on-duty dispatcher. The Dispatcher will begin the initial incident report.

V. Any other safety concerns can be reported using the Form 26 forms that will be in the Dispatch, the Drivers Area, Garage, and Safety offices. A Drop box for anonymous

reporting will also be in each Driver area available to all employees who wish to report a concern anonymously.

VI. After the Initial Incident Report is started, the employee will be asked to complete a Statement Report as well as turn in any other information that was gathered, including witness statements and photographs of the scene which may be submitted through the Dispatcher, their respective supervisor, manager, or Safety/Security Department via email at rruddy@indiantrails.com.

VII. All Initial Incident Reports are given to the Safety Director who will then initiate an internal Preventability Determination.

VIII. The determination is made after reviewing all the available data gathered. This could include Witness Statements, Photos, Drivers Statements, Video Surveillance footage, and Police reports.

IX. Preventability determination will be made by the Safety Director. The safety sensitive employee will be notified as soon as possible. If the determination is preventable, the Employee may request to have the Determination appealed to the Accident Review Committee.

RESPONSIBILITES

I. **Safety Director:**
   a. Monitor the implementation of federal, state, and local health and safety laws, ordinances, and procedures.
   b. Acknowledge the receipt of Initial Incident Reports.
   c. Monitor the performance of the Safety Reporting Program and make any necessary recommendations for improvement.
   d. Coordinate training for all employees/vendors/contractors.

II. **Indian Trails Staff:** Promptly report all hazards, near-miss events, or safety concerns by completing a Form 26 form (Initial Incident Report).

14. Indian Trails Change Control Configuration Management SOP

INTRODUCTION

I. The Transit Contractor Executive oversees the development, implementation, and maintenance of a comprehensive Change Configuration Management Program (CCMP) for RTA contracted services including Indian Trails facilities, revenue vehicles, safety-critical systems such as communications, and plans and policies affecting safety or security.

II. The goal of the CCMP is to (1) define and develop guidelines that will ensure system baselines are established, (2) ensure design changes are correctly controlled, managed, and communicated to the appropriate stakeholders, and (3) ensure an efficient system development process is created and maintained.

III. The current objectives for the Indian Trails CCMP include the following:
   A. Define and document Change Configuration Management Processes
   B. Educate and train staff on CCMP processes
   C. Develop CCMP performance measures
   D. Provide accurate information
   E. Perform CCMP assessments/audits

SCOPE

I. The CCMP establishes guidelines for administering a uniform change configuration management program for upgrades, refurbishment, and changes to facilities or systems impacting RTA contracted services. These guidelines include documentation, management, and approval requirements for change configuration activities.

APPLICABILITY

I. This CCMP applies to Indian Trails revenue vehicles and facilities used for RTA contracted services. The guidelines in this CCMP apply to all aspects of the system, including, but not limited to, new and rehabilitation projects impacting revenue vehicles, and facilities.

II. The baseline for all infrastructure changes will be the as-built and approved contractor/vendor-confirmed drawings, specifications, software, the latest revision of drawings for existing infrastructure, operations and maintenance manuals, and standard operating procedures. The effective date for the baseline will depend upon the element or system, generally being the date of acceptance by the Indian Trails organization.

III. This document will be reviewed and updated annually by Indian Trails.

PURPOSE

I. Change Configuration Management is the systematic control of the physical and operational features of a safety/security-critical project, program, system, or operation, along with the monitoring and documenting of all changes to these features. The procedure for initiating, processing, and implementing safety/security-critical modifications and improvements must include complete and accurate documentation.

II. This document will establish for Indian Trails:
    a. Clear and consistent criteria for determining what equipment, facility, and documentation changes are subject to configuration management and document change control;
    b. Consistent procedures for the submittal, approval, and implementation of all changes to the subject system, equipment, or facility changes;
    c. Processes for documentation and dissemination of all such configuration changes;
    d. A process to ensure all configuration changes affecting personnel, equipment, and procedures are carefully analyzed for safety/security impacts and hazards that the changes may introduce;
    e. An efficient and consistently applied process for distributing, safely storing, and quickly retrieving all applicable documents.

RESPONSIBILITIES

I. The Transit Contractor Executive is responsible for configuration management and change control oversight at Indian Trails for RTA contracted services. The Safety Director (SD), under the direction of the Transit Contractor Executive, is responsible for monitoring compliance with this configuration management procedure for RTA contracted services.

II. Each relevant stakeholder shall be responsible for compliance with the requirements of the CCMP, including the following: develop, maintain, and update specific internal procedures, which clearly define the day-to-day processes for identifying, approving, validating, and communicating changes to its assets. These procedures shall then be submitted to the Indian Trails Executive Safety Committee (ESC) for approval.

III. The change initiator is responsible for completing the required change control document and submitting it, along with the applicable supporting documents in electronic format, to the designated Document Control Manager for processing.

PROCEDURE

I. Properly controlled change configuration management and change control are required by 49 CFR 673 and 674 for all safety/security-critical processes. A process is safety/security-critical if it affects, in any way, the safety of passengers, employees, contractors, or the general public. Safety Risk Management establishes each process's safety/security criticality (see PTASP). Procedures for which analysis yields a Hazard Severity Rating of Category 1 (Catastrophic) or 2 (Critical) shall be deemed safety/security-critical. The Transit Contractor Executive makes the final decision about the safety/security criticality or risk assessment of any area, process, procedure, or element of the system.

II. Safety/security criticality is established for the following areas:
    a. Facilities and Facilities Rehabilitation
    b. Communications Equipment
    c. Vehicle Acquisitions and Overhauls
    d. Fire Life Safety Systems
    e. OEM Modifications
    f. ADA Compliance
    g. Hazardous Materials / Environmental Controls
    h. Operating Rules and Procedures
    i. Maintenance Rules and Procedures
    j. Safety Rules and Procedures
    k. Safety and Security Training
    l. Drug and Alcohol Programs

III. All safety/security-critical documentation shall be reviewed by the department that owns it at least once annually to ensure it is current and meets all PTASP requirements. Each document shall be updated appropriately per the Document Format and Control Procedure. An external third party will perform annual audits of the documents.

IV. Minimum Criteria for processes:
    a. System-wide change configuration management procedures will apply to all drawings, procedures, manuals, schematics, specifications, training documents, sign-off sheets, checklists, etc., which apply to the safety/security-critical process.
    b. Departmental document control procedures, including version control, will apply to all the above.
    c. Required reviews and sign-off procedures for changes, modifications, and revisions shall apply.
    d. The development of written procedures and checklists (when relevant) will apply to all safety/security-critical processes.
    e. Adequate and technologically current training programs will apply with documentation of such programs, including on-the-job training.
    f. When applicable, quality assurance processes will apply through internal auditing procedures, quality inspection, and quality control.
    g. Processes found to have changed in safety/security criticality will be addressed immediately and appropriately.

h. Review of all processes for changes in their safety/security-critical status shall apply under the following conditions:
    i. When a significant change impacting a safety/security-critical element of the system or process occurs, defined as changes to operating territory, vehicle acquisition or overhaul, new or rehabbed facilities, system power configuration changes, and any other critical component of Indian Trails operations.
    ii. When a safety/security-critical element affecting a safety/security-critical process is vacated, created, or changed, including reorganization.
    iii. At least once every three years.

Change Configuration Management/Change Control Process

I. Configuration changes shall be classified as either Class I or Class II. The originator may decide the class of a proposed change; however, the Executive or the SD may change the original classification. The Indian Trails Contract Executive has final decision-making authority regarding the class of the configuration change.
    a. Class I Changes:
        i. Class I changes shall be developed and individually submitted for each proposed change through a standardized Engineering Change Request (ECR) document or other approved documented request process of Indian Trails. The ECR or documented request will provide detailed information and other related data to support the formal change approval, which will affect a change to the configuration of an asset. Class I changes directly affect the following:
            1. Form, fit, or function of an asset
            2. Safety of the transit system
            3. Warranty provisions
            4. Acquisition or support costs of an asset or future spare parts
    b. Class II Changes:
        i. Class II changes are all changes that are not classified as Class I changes. Generally, Class II changes are usually required to amend, update, or clarify documents and drawings. All Class II changes shall be submitted individually on a standardized ECR form or through a documented request, with a detailed description of the proposed change.
    c. Deviations
        i. Deviations are formal requests made before manufacturing an item that departs from a design configuration for a specified number of units and a specified period. A deviation differs from an ECR in that an approved ECR requires a corresponding revision of the asset's documentation. A deviation does not require modification of the documentation.

Process

I. Configuration changes requiring hazard review under the minimum criteria above will be subject to review as follows:
   a. Proposed changes to safety/security-critical items defined in this procedure shall be submitted in writing to the ESC. Supporting drawings, schematics, manuals, programs, and other documentation shall be presented with the proposal.
   b. The ESC will review the change with assistance from subject matter technical experts and determine hazards appropriate for safety committees with the configuration change. The hazard assessment performed for each change shall be documented per the PTASP.
   c. If the changes result in no significant hazard (see designations on the Risk Index of the PTASP), the SD will advise the Transit Contract Executive that no action is required, and the changes are acceptable without review. With the Transit Contract Executive's approval, the SD will notify the ESC of their decision.
   d. If the changes result in significant hazards (red and yellow designations on the Hazard Acceptance Criteria), the SD, under the direction of the Transit Contract Executive, will prepare a brief for the appropriate safety committee on the hazards, along with recommendations for corrective actions to be implemented for the change to take place. If no corrective action results in an acceptable level of risk, the SD will include that information in brief.
   e. The SD will present the findings of the configuration management review to the ESC.
   f. The ESC shall decide on the proposed configuration change. The options are:
      i. Proceed with the change as planned
      ii. Implement corrective action and proceed with the change
      iii. Implement a different change (which must then be reviewed for hazards through this procedure)
      iv. Provide guidance on alternate means of implementing the change to eliminate the hazards.
      v. Disapprove the change
   g. The SD shall document all recommendations of the appropriate safety committee, and management will implement them as appropriate.

Change Configuration Documentation and Records

I. The change configuration records will be the basis for ongoing life cycle configuration change control. Detailed change configuration records will ensure an audit trail from the current facility or equipment configuration to its inception.

II. All agreed-upon changes shall be documented, and a sign-off will be included to verify that the modification was approved and completed. All completed configuration/change management documentation shall be retained appropriately by Indian Trails or its designated consultant, owner's representative, or other contractors.

15. Certification of Compliance with 49 CFR Part 673

In accordance with 49 CFR part 673.13-c, RTA certified that it has created this PTASP in compliance with the requirements and guidance of FTA. This certification is submitted annually through the Transit Award Management System (TrAMS).

Certifying compliance official:

Ben Stupka, or designee

Executive Director and Accountable Executive, or designee

RTA