

**LAREDO & WEBB COUNTY AREA METROPOLITAN PLANNING ORGANIZATION  
ACTION ITEM**

<b>DATE:</b> 05-15-2024	<b>ITEM:</b> IV.E.
<b>SUBJECT: RESOLUTION</b> Discussion with possible action to approve Resolution No. <b>MPO 2024-07</b> , supporting and adopting the fifth version of the Laredo Transit Management Inc. (LTMI) Public Transportation Agency Safety Plan (PTASP) and Safety Performance Targets for calendar year 2024 and to incorporate into the metropolitan planning process.	
<b>INITIATED BY:</b> Staff	<b>STAFF SOURCE:</b> Juan S. Mendive, MPO Director Robert J. Garza, Transit Director
<b>PREVIOUS ACTION:</b> On May 17, 2023 the Laredo and Webb County Area MPO Policy Committee approved the fourth version of the LTMI PTASP and Safety Performance Targets for calendar year 2023.	
<b>BACKGROUND:</b> The current and previous federal transportation bills, the Bipartisan Infrastructure Law and the FAST Act, respectively, included a series of requirements for Transportation Performance Management (TPM). Since the passage of federal transportation bill Moving Ahead for Progress in the 21 <sup>st</sup> Century Act (MAP-21), the United States Department of Transportation has worked through the federal rulemaking process to establish a series of performance measures and corresponding target setting requirements. The Federal Highway Administration (FHWA) established performance measures for Safety (PM1), Pavement and Bridge condition (PM2) and System Performance and freight (PM3). Federal Transit Administration (FTA) established performance measures for Transit Asset Management (TAM) and transit safety.  As a result, the Laredo transit public transportation provider, El Metro, also known as the Laredo Transit Management Inc. (LTMI), has developed and is recommending for the Laredo and Webb County Area MPO to support the adoption of the fifth version of the LTMI Public Transportation Agency Safety Plan (PTSAP) and Safety Performance Targets for calendar year 2024, The LTMI's fifth version of the PTASP was adopted and approved by the Laredo Mass Transit Board on April 2, 2024. Attached, is the LTMI's fifth version of the PTASP plan of 2024.  It is important to note that there is no risk to federal funding within the metropolitan planning area if these performance targets are not met. However, the MPO will coordinate with El Metro to ensure that plans and programs as part of the metropolitan planning process support achieving these targets.	
<b>COMMITTEE RECOMMENDATION:</b> The Technical Committee recommends approval of Resolution No. MPO 2024-07.	<b>STAFF RECOMMENDATION:</b> Staff recommends approval of Resolution No. MPO 2024-07.



# LAREDO & WEBB COUNTY

## AREA METROPOLITAN PLANNING ORGANIZATION

### RESOLUTION NO. MPO 2024-07

BY THE LAREDO AND WEBB COUNTY AREA  
METROPOLITAN PLANNING ORGANIZATION  
POLICY COMMITTEE

#### ADOPTING THE FIFTH VERSION OF THE LAREDO TRANSIT MANAGEMENT INC. (LTMI) PUBLIC TRANSPORTATION AGENCY SAFETY PLAN (PTASP) TARGETS FOR 2024.

**WHEREAS**, the Laredo and Webb County Area Metropolitan Planning Organization (LWCAMPO), is the designated Metropolitan Planning Organization, for the Laredo Urbanized Area; and

**WHEREAS**, In 2012 Congress passed the Moving Ahead for Progress in the 21st Century Act (MAP-21), required metropolitan and statewide transportation planning processes include the incorporation of performance goals, measures, and targets into the process of identifying needed transportation improvements and project selection; and

**WHEREAS**, Fixing America's Surface Transportation Act of 2015 (FAST Act), continued the requirements established by MAP-21, and stipulated that States and MPOs must: use a set of federally established performance measures, set targets and monitor progress for each of the performance measures and in 2021 Congress passed the Infrastructure Investment and Jobs Act (IIJA), continuing the performance-based planning program; and

**WHEREAS**, the regulations require certain operators of public transportation systems that receive federal funds under the FTA Urbanized Area Formula Grants to develop a Public Transportation Agency Safety Plan (PTASP) that includes safety performance targets; and

**WHEREAS**, the Laredo Transit Management Inc. is the only designated recipient of Federal Transit Administration (FTA) Urbanized Area Formula Grant Program funds under 49 U.S.C. Section 5307 in the Laredo MPO Urbanized Planning Area; and

**WHEREAS**, the LTMI has revised, identified, reviewed, and calculated their PTASP Safety Performance targets for fatalities, injuries, safety events, and major mechanical failures; and

**WHEREAS**, On April 2, 2024, the Laredo Mass Transit Board adopted and approved the LTMI's fifth PTASP version and Safety Performance targets for 2024; and

**NOW THEREFORE BE IT RESOLVED**, that the Laredo and Webb County Area Metropolitan Planning Organization (LWCAMPO), hereby agrees to support and adopt the fifth version of the LTMI PTASP and Safety Performance targets for 2024 as shown on Exhibit No. 1.

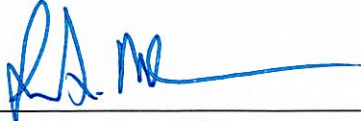
**We certify that the above resolution was passed and adopted on this 15th day of May 2024, at a public meeting of the Policy Committee of the Laredo and Webb County Area Metropolitan Planning Organization (LWCAMPO).**



Honorable Tano E. Tijerina  
Webb County Judge and Chairperson  
of the LWCAMPO Policy Committee



Epigmenio "Epi" Gonzalez, P.E.  
District Engineer  
TxDOT - Laredo District



Juan S. Mendive, AICP  
LWCAMPO Director

**Laredo Transit Management, Inc.**  
**El Metro Transit**  
**Public Transportation Agency Safety**  
**Plan**

**Version 5**

**Adopted 04-02-2024**

**In compliance with 49 CFR Part 673**

**Developed in conjunction with**  
**the Texas Department of**  
**Transportation and the Laredo**  
**Transit Management, Inc.**

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## 1. EXECUTIVE SUMMARY

Moving Ahead for Progress in the 21st Century (MAP-21) granted the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive framework to oversee the safety of public transportation throughout the United States. MAP-21 expanded the regulatory authority of FTA to oversee safety, providing an opportunity to assist transit agencies in moving towards a more holistic, performance-based approach to Safety Management Systems (SMS). This authority was continued through the Fixing America's Surface Transportation Act (FAST Act).

In compliance with MAP-21 and the FAST Act, FTA promulgated a Public Transportation Safety Program on August 11, 2016 that adopted SMS as the foundation for developing and implementing a Safety Program. FTA is committed to developing, implementing, and consistently improving strategies and processes to ensure that transit achieves the highest practicable level of safety. SMS helps organizations improve upon their safety performance by supporting the institutionalization of beliefs, practices, and procedures for identifying, mitigating, and monitoring safety risks.

There are several components of the national safety program, including the National Public Transportation Safety Plan (NSP), that FTA published to provide guidance on managing safety risks and safety hazards. One element of the NSP is the Transit Asset Management (TAM) Plan. Public transportation agencies implemented TAM plans across the industry in 2018., The subject of this document is the Public Transportation Agency Safety Plan (PTASP) rule, 49 CFR Part 673, and guidance provided by FTA.

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. At Laredo Transit Management, Inc. (LTMI), all levels of Leadership, Administration and Operations are responsible for the safety of their clientele and themselves. To improve public transportation safety to the highest practicable level in the State of Texas and comply with FTA requirements, the Texas Department of Transportation (TxDOT) has developed the initial Agency Safety Plan (ASP) in collaboration with Laredo Transit Management, Inc. The Laredo Transit Management, Inc. has updated the initial Agency Safety Plan to develop the fourth version of the Public Transportation Agency Safety Plan in collaboration with the City of Laredo and the Laredo Mass Transit Board with fiduciary responsibility for (LTMI).

To ensure that the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the NSP, the City of Laredo, the Laredo Mass Transit Board and LTMI adopt this ASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP), per 49 U.S.C. 5329(d)(1)(A).<sup>1</sup> While safety has always been a primary function at LTMI, this document lays out a process to fully implement an SMS over the next several years that complies with the PTASP final rule.

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<sup>1</sup>Federal Register, Vol. 81, No. 24



**A. Plan Adoption – 673.11(a)(1)**

This Public Transit Agency Safety Plan is hereby adopted, certified as compliant, and signed by:

  
ACCOUNTABLE EXECUTIVE SIGNATURE  
Robert J. Garza, El Metro, Transit Director

3/26/24  
DATE

Since El Metro is considered a department of the City of Laredo, the main governing body is the Laredo City Council acting as the Laredo Mass Transit Board. Approval of this plan by the City Council/Mass Transit Board occurred on April 02, 2024 and is documented in RESOLUTION No. 2024-RT-09 from the City Council Meeting.

**B. Certification of Compliance – 673.13(a)(b)**

El Metro certifies on April 02, 2024 that this Agency Safety Plan is in full compliance with 49 CFR Part 673 and has been adopted and will be implemented by El Metro as evidenced by the plan adoption signature and necessary City Council/Laredo Mass Transit Board approvals under Section 1.A of this plan. In addition, El Metro will certify compliance with the PTASP regulation through FTA's Transit Award Management System (TrAMS) and the annual Certifications and Assurances process.



## **2. TRANSIT AGENCY INFORMATION – 673.23(D)**

The City of Laredo began operating public transportation in 1985. LTMI was founded in 2003 and is governed by the City of Laredo Mass Transit Board. The City contracts with Hendrickson Transportation Group, Inc., (HTG) to provide management and operating services. Under the contract, Hendrickson Transportation Group, Inc., (HTG) provides a Transit Director and Two Assistant General Managers. The Transit Director is approved by the Laredo Mass Transit Board to oversee the administrative functions of LTMI. LTMI is known as El Metro.

El Metro is the public transportation provider for the City of Laredo, Texas and is the largest transit provider in the region. The El Metro main office is located at Transit Center 1301 Farragut ST, 3<sup>rd</sup> Floor, Laredo, TX 78040.

El Metro operates fixed route services seven days a week across 23 routes within the City of Laredo. Schedules for fixed route service vary by route, with many routes having one schedule for Monday-Friday or Monday-Saturday and another schedule for Saturdays or Sundays/Holidays. In addition, some routes have A and B segments that have differing schedules. El Metro also operates El Lift Paratransit, which provides shared, origin to destination public transportation to people with disabilities who are unable to use El Metro's fixed route buses. El Lift uses the following service schedule:

- Monday, Wednesday, Friday: 5:00 am – 10:30 pm
- Tuesday, Thursday: 5:30 am – 10:30 pm
- Sunday: 8:00 am – 8:30 pm

El Metro Transit is provided by the City of Laredo through the Laredo Mass Transit Board and managed by a private contractor, Hendrickson Transportation Group, Inc.,(HTG) which provides the Transit Director and the management team consisting of the Assistant General Manager of Administration, the Assistant General Manager of Operations, Operations Manager, The Maintenance Asset Officer, Maintenance Manager, Assistant Maintenance Manager, the Transit Procurement Specialist, Grant and Budget Administrator, the Chief Safety Officer (CSO), and Safety and Training Coordinator are part of Laredo Transit Management, Inc.

No additional transit service is provided by El Metro on behalf of another transit agency or entity at the time of the development of this plan.

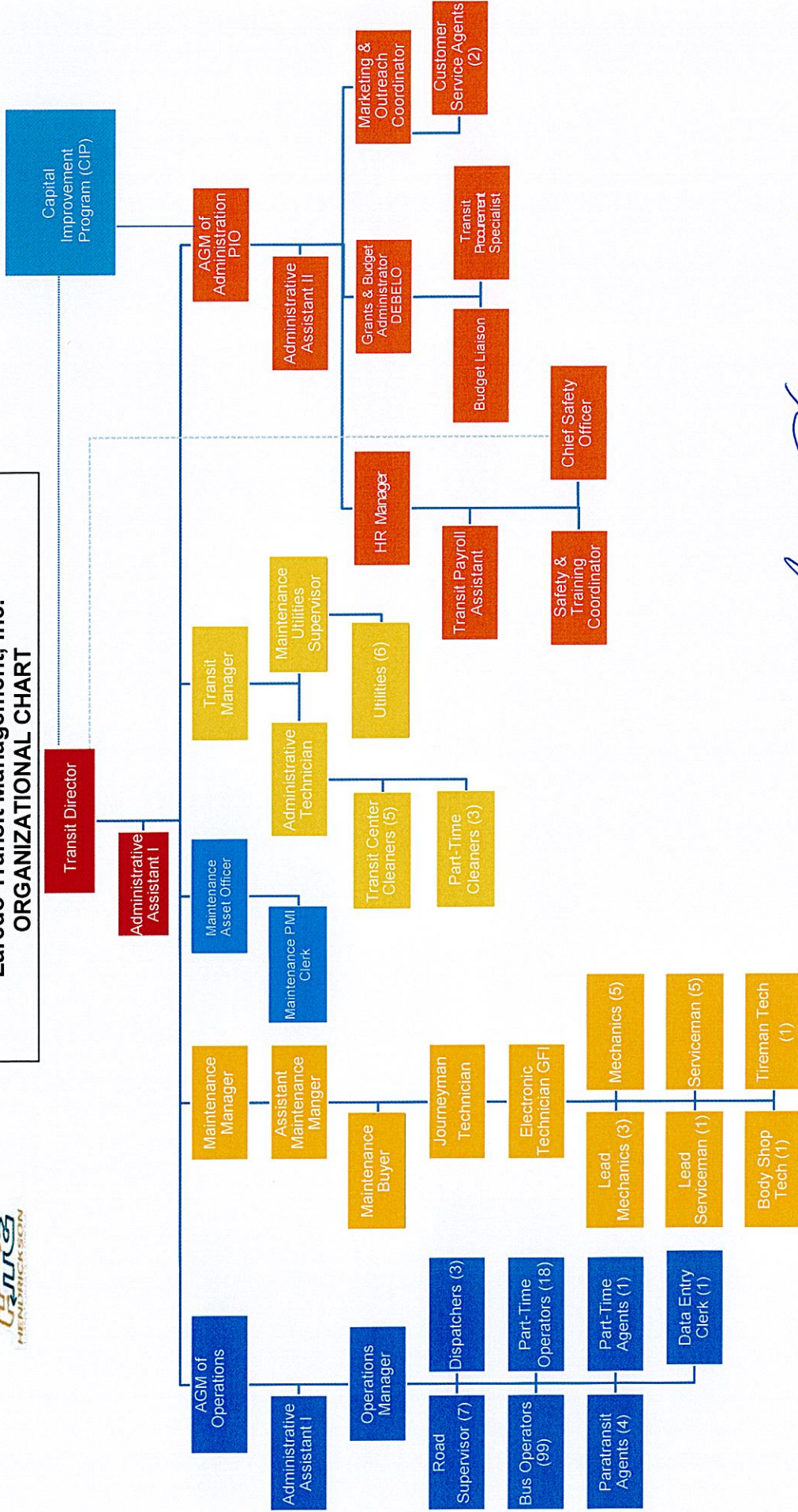
Table 1 contains agency information, while an organizational chart for El Metro is provided in Figure 1.

**TABLE 1: AGENCY INFORMATION**

Information Type	Information
Full Transit Agency Name	Laredo Transit Management, Inc. (LTMI)
Transit Agency Address	1301 Farragut St, Laredo, TX 78040
Name and Title of Accountable Executive 673.23(d)(1)	Robert J. Garza, Transit Director
Name of Chief Safety Officer or SMS Executive 673.23(d)(2)	Sergio Gomez, Chief Safety Officer
Key Staff	Monica Garcia, AGM of Administration/PIO
Key Staff	Rosa Soto, AGM of Operations
Key Staff	Joe Lerma, Safety & Training Coordinator
Mode(s) of Service Covered by This Plan 673.11(b)	Fixed Route Bus and Demand Response
List All FTA Funding Types (e.g., 5307, 5310, 5339)	5307, 5310, 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route Bus and Demand Response
Number of Vehicles Operated	70



**Laredo Transit Management, Inc.**  
**ORGANIZATIONAL CHART**



*Rubert C. [Signature]*  
Transit Director  
Date: 3/27/24



## ***A. Authorities & Responsibilities – 673.23(d)***

As stated in 49 CFR Part 673.23(d), El Metro has established the necessary authority, accountabilities, and responsibilities for the management of safety amongst the key individuals within the organization, as those individuals relate to the development and management of our SMS. In general, the following defines the authority and responsibilities associated with our organization.

The **Accountable Executive** has ultimate responsibility for carrying out the SMS of our public transportation agency, and control or direction over the human and capital resources needed to develop and maintain both the ASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan, in accordance with 49 U.S.C. 5326. The Accountable Executive has authority and responsibility to address substandard performance in the El Metro SMS, per 673.23(d)(1).

**Agency leadership and executive management** include members of our agency leadership or executive management, other than the Accountable Executive, CSO/SMS Executive, who have authority or responsibility for day-to-day implementation and operation of our agency's SMS.

The **CSO** is an adequately trained individual who has the authority and responsibility as designated by the Accountable Executive for the day-to-day implementation and operation of the El Metro SMS. As such, the CSO is able to report directly to our transit agency's Accountable Executive.

**Key staff** are staff, groups of staff, or committees to support the Accountable Executive, CSO or SMS Executive in developing, implementing, and operating our agency's SMS.

**Front line employees** perform the daily tasks and activities where hazards can be readily identified so the identified hazards can be addressed before the hazards become adverse events. These employees are critical to SMS success through each employee's respective role in reporting safety hazards, which is where an effective SMS and a positive safety culture begins.

In addition, over the next year, El Metro Human Resources Manager in collaboration with the CSO will be reviewing and modifying, if necessary, our current job descriptions to ensure the job descriptions comply with 49 CFR Part 673.

### **3. SAFETY POLICIES AND PROCEDURES**

#### ***A. Policy Statement – 673.23(a)***

El Metro recognizes that the management of safety is a core value of our business. The management team at El Metro has embraced the SMS and is committed to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our employees, customers, and the general public. All levels of management and frontline employees are committed to safety and understand that safety is the primary responsibility of all employees.

El Metro is committed to:

- Communicating the purpose and benefits of the SMS to all staff, the union, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.
- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.
- Ensuring that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.
- Establishing Safety Performance Targets (SPT) that are realistic, measurable, and data driven.
- Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.

  
Robert J. Garza, El Metro, Transit Director

*3/24/24*  
Date

## **I. Employee Safety Reporting Program (ESRP) – 673.23(b)**

Frontline employees are a significant source of safety data. These employees are typically the first to spot unsafe conditions that arise from unplanned conditions either on the vehicles, in the maintenance shop, or in the field during operations. For this reason, the Employee Safety Reporting Program (ESRP) is a major tenet of the PTASP Rule. Under this rule, agencies must establish and implement a process that allows employees to report safety conditions directly to senior management; provides protections for employees who report safety conditions to senior management; and includes a description of employee behaviors that may result in disciplinary action.

El Metro has the *LTMI Employee Safety Reporting Program (ESRP)* (Appendix A, Table 8 shows the document name, file name, and date of adoption) under which the employees are expected to use established procedures to submit comments, information, and assistance where safety and health is concerned. The program requires employees to report hazards, unsafe conditions, and unsafe behaviors to the Safety & Training Coordinator, Chief Safety Officer, their immediate Supervisor, any Safety Planning Advisory Committee (SPAC) member or Department Leadership. Employees have the option of submitting reports confidentially using the *LTMI Employee Safety Hazard Reporting Form* (Appendix A) and as such can report concerns without fear of repercussions. The program also calls for employees to meet on a regular basis to discuss safety and health issues. These meetings also provide another avenue for employees to report concerns.

In addition, El Metro has a policy in place in the *General Rules, Regulations and Policies Employee Handbook* (Appendix A) that requires employees who discover a condition which imperils the welfare of passengers, employees, and/or equipment to promptly report the problem to the Maintenance, Supervisor or Dispatcher.

El Metro also has a *Customer Comment/Complaint Procedure and Record Retention Policy* (Appendix A) that ensures riders of the system have an easy and accessible way to provide feedback to the agency. This procedure provides customers with a variety of ways to contact El Metro with comments or complaints and also provides protocols for feedback acknowledgment and customer report retention. In addition, employees can also submit safety concerns, anonymous or not, using the customer comment/complaint form on [www.elmetrotransit.com](http://www.elmetrotransit.com).

During the annual review, El Metro will review and modify, if necessary, both our internal and external reporting procedures and programs to develop them into a full ESRP to ensure that the procedure complies with 49 CFR Part 673. *LTMI Employee Safety Reporting Program* Implementation, LTMI will conduct Instruction-Led Training for all employees. They will be presented with a PowerPoint presentation and copies of the reporting form. In addition, LTMI will post avenues for reporting, with protections, at each Department's bulletin board. Any changes will be submitted at annual certification. On March 23, 2020, El Metro forwarded the *LTMI Employee Safety Reporting Program and memo*, via certified mail, to the Union.

In general, the El Metro ESRP will ensure that all employees are encouraged to report safety conditions directly to senior management or their direct supervisor for elevation to senior management. The policy will include any contract employees. The policy also includes what protections are afforded to employees who report safety related conditions and describes employee behaviors that are not covered by those protections. The policy also elaborates on how safety conditions that are reported will be reported back to the initiator(s) – either to the individual or groups of individuals or organization, dependent on the nature of the safety condition.

To bolster the information received from frontline employees, El Metro will continue to review our current policy for how our agency receives information and safety related data from employees and customers. If necessary, we will develop additional means for receiving, investigating and reporting the results from investigations back to the initiator(s) – either to the person, groups of persons, or distributed agency- wide to ensure that future reporting is encouraged.

## **II. Communicating the Policy Throughout the Agency – 673.23(c)**

El Metro is committed to ensuring the safety of our clientele, personnel and operations. Part of that commitment is developing an SMS and agency wide safety culture that reduces agency risk to the lowest level possible. The first step in developing a full SMS and agency wide safety culture is communicating our *LTMI Safety Management Policy (SMP)* (Appendix A, Table 8 shows the document name, file name, and date of adoption) throughout our agency. LTMI initiated the communication on August 4, 2020 to all Executive Leadership, Administration, All Department Leadership and Route Supervisors. LTMI will provide Instruction-Led Training to all employees so that they can be familiar with our SMP and where they can find it. It will be posted at all Department’s bulletin boards. Any rules or procedures will be provided to the Union.

The SMP and safety objectives are at the forefront of all communications. This communications strategy will include posting the policy in prominent work locations for existing employees and adding the policy statement to the on-boarding material for all new employees. In addition, the policy statement will become part of our agency’s regular safety meetings and other safety communications efforts. The policy will be signed by the Accountable Executive so that all employees know that the policy is supported by management.

Possible methods of communicating the LTMI Safety Management Policy to employees include, but are not limited to, the following:

- New Employee Orientation
- Driver’s Training
- Internal Marketing Strategies
- Instructor-Led Training
- Safety Meetings

- El Metro Toolbox Talk (Safety Bulletin)
- Safety Planning Advisory Committee (SPAC)
- Staff Meetings
- Department Bulletin Boards
- Employee Handbooks
- Email
- WebEx webinar

### ***B. PTASP Development and Coordination with TxDOT – 673.11(d)***

This PTASP has been developed by TxDOT on behalf of Laredo & Webb county Area Metropolitan Planning Organization, which is the Metropolitan Planning Organization (MPO) for the area, and LTMI in accordance with all requirements stated in 49 CFR Part 673 applicable to a small public transportation provider. TxDOT mailed a formal call for participation in a State sponsored PTASP development process to all Texas Section 5307 small bus transit agencies on January 15, 2019 and followed that call with a series of phone calls and additional correspondence. El Metro provided a letter to TxDOT opting into participation on March 15, 2019 and has been an active participant in the development of this plan through sharing existing documentation and participating in communication and coordination throughout the development of this plan. The El Metro documentation used in the development of this plan is presented in Table 8, in Appendix A.

In support of tracking performance on our Safety Assurance (SA) and Safety Promotion (SP) processes, El Metro conducted a safety culture survey from December 21, 2019 to December 30, 2019. This yearly survey is intended to help El Metro assess how well we communicate safety and safety performance information throughout our organization by gauging how safety is perceived and embraced by El Metro’s administrators, supervisors, staff and contractors. The survey is designed to help us assess how well we are conveying information on hazards and safety risks relevant to employees’ roles and responsibilities and informing employees of safety actions taken in response to reports submitted through our ESRP. Results from our most recent survey were analyzed and incorporated into the implementation strategies contained in this ASP.

Once the documents were reviewed, an on-site interview was conducted with El Metro on October 28, 2019 to gain a better understanding of the agency and the agency’s personnel. This understanding was necessary to ensure that the ASP was developed to fit El Metro’s size, operational characteristics, and capabilities.

The draft ASP was delivered to LTMI/El Metro in March 2020 for review and comment. Once review was completed and any adjustments made, the final was delivered to LTMI/El Metro for review and adoption.



### C. PTASP Annual Review – 673.11(a)(5)

Per 49 U.S.C. 5329(d)(1)(D), this plan includes provisions for annual updates of the SMS. As part of El Metro’s ongoing commitment to fully implementing SMS and engaging our agency employees in developing a robust safety culture, El Metro will review the ASP and all supporting documentation annually. The review will be conducted as a precursor to certifying to FTA that the ASP is fully compliant with 49 CFR Part 673 and accurately reflects the agency’s current implementation status. Certification will be accomplished through El Metro’s annual Certifications and Assurances reporting to FTA.

### D. Safety Committee – 673.11

Pursuant to 49 U.S.C. 5329(d)(5)(A) The annual review will include the safety committee’s approval of the agency’s Agency Safety Plan (ASP) and any updates to the ASP. Any supporting documents such as (Standard Operating Procedures [SOP], Policies, Manuals, etc.) will be used to fully implement all the processes used to manage safety at El Metro. All changes will be noted (as discussed below) and the Accountable Executive will sign and date the title page of this document after the safety committee’s approval and will provide documentation of approval of ASP by the Laredo Mass Transit Board whether by signature or by reference to resolution.

As processes are changed to fully implement SMS or new processes are developed, El Metro will track those changes for use in the annual review. In addition, Instructor-Led Training will be provided to all employees informing them of any changes. The annual ASP review will follow the update activities and schedule provided below in Table 2.

**TABLE 2: ASP ANNUAL UPDATE TIMELINE**

Task	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar
Review Agency Operations									
Review SMS Documentation <ul style="list-style-type: none"> <li>• Safety Management Policy;</li> <li>• Safety Risk Management;</li> <li>• Safety Assurance; and</li> <li>• Safety Promotion.</li> </ul>	→								
Deadline: Revision Requests				→					
Draft Revised ASP				→					
Draft delivered to Leadership for Comments									
Deadline: Comments on Revised ASP Draft					→				
SPAC approve ASP and updates									
Laredo Mass Transit Board (City Council) Approval								→	
Report Targets to TxDOT and the Laredo Urban Transportation Study									→
Update Version No., Adopt & Certify Plan Compliance									★

As shown in Table 2, activities are as follows:

- July 1 to September 30, LTMI Leadership will review Agency Operations;
- July 1 to September 30, the Accountable Executive, key personnel, and the CSO will review SMS documentation;
- October 15, deadline for any revision requests;
- October 16 to November 15, draft revised ASP;
- December 29, deadline on comments for revised ASP draft;
- February 1 to March 5, SPAC will approve ASP and any updates
- February 1 to March 16, Laredo Mass Transit Board adoption;
- March 17 to March 30, report Safety Performance Targets to TxDOT and the Laredo Webb County Area Metropolitan Planning Organization;
- March 16 thru 30<sup>th</sup>, update version number, adopt and certify plan compliance in FTA's TrAM

The implementation of SMS is an ongoing and iterative process, and, as such, this PTASP is a working document. Therefore, a clear record of changes (Appendix B, Section B) and adjustments is kept in the PTASP for the benefit of safety plan performance management and to comply with Federal statutes.

### ***E. PTASP Maintenance – 673.11(a)(2)(c)***

El Metro will follow the annual review process outlined above and adjust this ASP as necessary to accurately reflect any Federal Transit Administration (FTA) General Directives under 49 U.S.C. 5329 and 49 CFR Part 670. This plan will document the processes and activities related to SMS implementation as required under 49 CFR Part 673 Subpart C and will make necessary updates to this ASP as El Metro continues to develop and refine our SMS implementation.

### ***F. PTASP Documentation and Recordkeeping – 673.31***

At all times, El Metro will maintain documents that set forth our ASP, including those documents related to the implementation of El Metro's SMS and those documents related to the results from SMS processes and activities. El Metro will also maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that our agency uses to carry out our ASP and all iterations of those documents. These documents will be made available upon request to the FTA, other Federal entity, or TxDOT. El Metro will maintain these documents for a minimum of three years after the documents are created. These additional supporting documents are cataloged in Appendix A and the list will be kept current as a part of the annual ASP review and update.

### G. Safety Performance Measures – 673.11(a)(3)

The PTASP Final Rule, 49 CFR Part 673.11(a)(3), requires that all public transportation providers must develop an ASP to include safety performance targets (SPTs) based on the safety performance measures established under the NSP. The safety performance measures outlined in the NSP were developed to ensure that the measures can be applied to all modes of public transportation and are based on data currently being submitted to the NTD. The safety performance measures included in the NSP are fatalities, injuries, safety events, and system reliability (State of Good Repair as developed and tracked in the TAM Plan).

There are seven (7) SPTs that must be included in each ASP that are based on the four (4) performance measures in the NSP. These SPTs are presented in terms of total numbers reported and rate per 100,000 Vehicle Revenue Miles (VRM). Each of the seven (7) is required to be reported by mode as presented in Table 3.

**TABLE 3: NSP SAFETY PERFORMANCE MEASURES**

Safety Performance Measure	SPT	
Fatalities	Total Number Reported	Rate Per 100,000 VRM
Injuries	Total Number Reported	Rate Per 100,000 VRM
Safety Events	Total Number Reported	Rate Per 100,000 VRM
System Reliability	Mean distance between major mechanical failure	

Table 4 presents El Metro’s reported baseline numbers for each of the performance measures. El Metro collected the past five (5) years of reported data to develop the rolling averages listed on table 4. Note: As the National Public Transportation Plan updates, so, will the SPT.

**TABLE 4: BASELINE 2024 SAFETY PERFORMANCE MEASURES**

Mode	Fatalities	Rate of Fatalities per 100,000 VRM	Injuries	Rate of Injuries per 100,000 VRM	Safety Events	Rate of Safety Events per 100,000 VRM	Mean Distance Between Major Mechanical Failure
Fixed Route (Bus)	0	0.00%	1.2	0.07%	2	0.11%	54,200.2
Demand Response	0	0.00%	0.2	0.11%	0.4	0.23%	36,658

\*rate = total number x 100,000 /total vehicle revenue miles traveled

**Table 5: 5-Year Safety Performance for El Metro by Mode of Service.**

<b>Fixed Route</b>							
<b>SPT Category For Fixed Route Service</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>5-Year Rolling Average</b>	<b>SPT 2024</b>
Total Number of Fatalities	0	0	0	0	0	0	0
Fatality Rate per 100,000 VRM	0	0	0	0	0.00	0.00	0.00
Total Number of Injuries	0	3	2	1	0	1.2	1.2
Injury rate per 100,000 VRM	0	0.17	0.12	0.06	0	0.07	0.07
Total Number of Safety Events	0	4	4	2	0	2	2
Safety Event rate per 100,000 VRM	0	0.23	0.24	0.12	0.00	0.11	0.11
Total Number of Major Mechanical Failures	5	10	15	15	28	14.6	14.6
System Reliability (failures/VRM)	338,363.6	174,809.0	111,315.0	110,521.0	56,315.0	54,200.2	54,200.2
Annual VRM	1,691,818	1,748,090	1,669,719	1,657,815	1,576,830	1,668,854	1,668,854
<b>Demand Response</b>							
<b>SPT Category For Demand Response Service</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>5-Year Rolling Average</b>	<b>SPT 2024</b>
Total Number of Fatalities	0	0	0	0	0	0	0
Fatality Rate per 100,000 VRM	0	0	0	0	0	0.00	0.00
Total Number of Injuries	0	1	0	0	0	0.2	0.2
Injury rate per 100,000 VRM	0	0.58	0	0	0	0.11	0.11
Total Number of Safety Events	0	2	0	0	0	0.4	0.4
Safety Event rate per 100,000 VRM	0	1.17	0	0	0	0.23	0.23
Total Number of Major Mechanical Failures	13	5	3	4	9	6.8	6.8
System Reliability (failures/VRM)	20,134.2	34,246.8	45,018.0	60,659.5	23,231.4	36,658	36,658
Annual VRM	261,744	171,234	135,054	242,638	209,083	203,951	203,951
<b>*Source: NTD Database</b>							
<b>*NTD ID: 60009</b>							

**Table 5.5:**

<b>Calendar Year 2023 Safety Performance Targets</b>					
<b>FIXED ROUTE</b>			<b>DEMAND RESPONSE</b>		
<b>Calendar Year 2023</b>	<b>SPT 2023</b>	<b>Target Met</b>	<b>Calendar Year 2023</b>	<b>SPT 2023</b>	<b>Target Met</b>
0	0	☑	0	0	☑
0.00	0.00		0.00	0.00	
1.2	1.4	☑	0.2	0.2	☑
0.07	0.19		0.11	0.11	
2	2.2	☑	0.4	0.4	☑
0.11	0.13		0.23	0.23	
14.6	15	☑	6.8	6	
54,200.2	158,280.5		36,658.0	45,099	
1,668,854	1,353,488	☑	203,951	214,414	

While safety has always been a major component of our agency operation, the adoption of this ASP will result in changes across all aspects of the organization designed to improve safety outcomes. The SPTs set in Table 6 and Table 7 reflect an acknowledgment that SMS implementation will produce new information that will be needed to accurately set meaningful SPTs. We will set our 2024 targets at the current NTD reported five-year average as we continue the process of fully implementing our SMS and develop our targeted safety improvements. This will ensure that we do no worse than our baseline performance over the last five years. At the bottom of Table 5, Our 2023 Safety Performance Targets are provided. In the Fixed Route Mode, all targets were met. The VRMs exceeded the 2023 target due to an increased in ridership after COVID-19 pandemic. In addition, Fixed Route total number of Safety events decreased by one based on a 5-year rolling average. A decline in injuries by one was also achieved. Our Demand Response did not meet all Safety Performance Targets but was well in the margins. The VRMs slightly decline due to low ridership at the beginning of the end of COVID-19 pandemic. In addition, Demand Response safety events and injuries remained same as no safety events or injuries were reported in 2023.

**TABLE 6: FIXED ROUTE (BUS) SAFETY PERFORMANCE TARGETS**

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities per 100,00 VRM	0.00%	0.00%
Injuries	1.4	1.4
Rate of Injuries per 100,000 VRM	0.19%	0.19%
Safety Events	2.2	2.2
Rate of Safety Events per 100,000 VRM	0.13%	0.13%
Mean Distance Between Major Mechanical Failure	158,280.5	158,280.5

\*rate = total number for the year x 100,000 /total vehicle revenue miles traveled

**TABLE 7: DEMAND RESPONSE SAFETY PERFORMANCE TARGETS**

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities per 100,000 VRM	0.00%	0.00%
Injuries	0.2	0.2
Rate of Injuries per 100,000 VRM	0.11%	0.11%
Safety Events	0.4	0.4
Rate of Safety Events per 100,000 VRM	0.23%	0.23%
Mean Distance Between Major Mechanical Failure	45,099	45,099

\*rate = total number for the year x 100,000/total vehicle revenue miles traveled

As part of the annual review of the ASP, El Metro will re-evaluate our SPTs and determine whether the SPTs need to be refined. As more data is collected as part of the SRM process discussed in this plan, El Metro may begin developing safety performance indicators to help inform management on safety related investments.

### **H. Safety Performance Target Coordination – 673.15(a)(b)**

El Metro will make our SPTs available to TxDOT and the Laredo & Webb County Area Metropolitan Planning Organization to aid in those agencies’ respective regional and long-range planning processes. To the maximum extent practicable, El Metro will coordinate with TxDOT and the Local MPO in the selection of State and MPO SPTs as documented in the Interagency Memorandum of Understanding (MOU) (Appendix A).

Each year during the FTA Certifications and Assurances reporting process, El Metro will transmit any updates to our SPTs to both the Laredo & Webb county Area Metropolitan Planning Organization and TxDOT (unless those agencies specify another time in writing).

## **4. SAFETY MANAGEMENT SYSTEMS – 673 SUBPART C**

As noted previously, FTA has adopted SMS as the basis for improving safety across the public transportation industry. In compliance with the NSP, National Public Transportation Safety Plan, and 49 CFR Part 673, El Metro is adopting SMS as the basis for directing and managing safety and risk at our agency. El Metro has always viewed safety as a core business function. All levels of management and employees are accountable for appropriately identifying and effectively managing risk in all activities and operations in order to deliver improvements in safety and reduce risk to the lowest practical level during service delivery.

SMS is comprised of four basic components: SMP, SRM, SA, and SP. The SMP and SP are the enablers that provide structure and supporting activities that make SRM and SA possible and sustainable. The SRM and SA are the processes and activities for effectively managing safety as presented in Figure 2.

**FIGURE 2: SAFETY MANAGEMENT SYSTEMS**



Implementing SMS at El Metro will be a major undertaking over the next several years. This ASP is the first step to putting in place a systematic approach to managing the agency’s risk. El Metro has already taken several steps to implement SMS, such as developing this initial ASP and designating a CSO. During the first year of implementation, El Metro will identify SMS roles and responsibilities and key stakeholder groups, identify key staff to support implementation, and ensure the identified staff receive SMS training. El Metro will also develop a plan for implementing SMS, inform stakeholders about the ASP, and discuss our progress toward implementation with the City of Laredo, the Laredo Mass Transit Board and our agency’s planning partners.

**A. Safety Risk Management – 673.25**

By adopting this ASP, El Metro is establishing the SRM process presented in Figure 3 for identifying hazards and analyzing, assessing and mitigating safety risk in compliance with the requirements of 49 CFR Part 673.25. The SRM processes described in this section are designed to implement the El Metro SMS.

**FIGURE 3: SAFETY RISK MANAGEMENT PROCESS**



The following teams will be used in the Safety Risk Assessment Process:

- **SMS Team:** The SMS Team consists of the Safety and Training Coordinator (if not available, a Route Supervisor with Added Safety Duties will assist) and the Chief Safety Officer.
- **Safety Risk Assessment Team:** The Safety Risk Assessment Team consists of the SMS Team and a qualified person from respective department.

LTMI’s Chief Safety Officer and Safety and Training Coordinator, if available, supported by qualified personnel from respective department will review and address each employee report and safety event, ensuring that hazards and their consequences are appropriately identified and resolved through LTMI’s SRM process and that reported deficiencies and non-compliance with rules or procedures are managed through LTMI’s Safety Assurance process.

LTMI’s Chief Safety Officer discusses actions taken to address reported safety conditions during the quarterly SMS Committee Meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the Chief Safety Officer or designee will follow up directly with the employee and a Union representative to investigate the concern. The Chief Safety Officer will discuss any mitigations that are implemented to the employees through SPAC and Training/Safety Meetings.

LTMI uses the SRM process as a primary method to ensure the safety of our operations, passengers, employees, vehicles, and facilities. It is a process whereby hazards and their consequences are identified, assessed for potential safety risk, and resolved in a manner acceptable to LTMI’s leadership. LTMI’s SRM process allows us to carefully examine what could cause harm and determine whether we have taken sufficient precautions to minimize the harm, or if further mitigations are necessary.

LTMI’s Safety Risk Assessment Team will work to identify hazards and consequences, assess safety risk of potential consequences, and mitigate safety risk. The results of LTMI’s SRM process are documented in our Safety Risk Register and referenced materials. Hazards, risk assessments and mitigations will be presented and discussed in the quarterly SMS Committee meetings, Quarterly Safety Planning Advisory Committee meetings, and Operations meetings and Maintenance meetings.



LMTI’s SRM process applies to all elements of our system including our operations and maintenance; facilities and vehicles; and personnel recruitment, training, and supervision.

The SRM is focused on implementing and improving actionable strategies that El Metro has undertaken to identify, assess and mitigate risk. The creation of a Risk Register provides an accessible resource for documenting the SRM process, tracking the identified risks, and documenting the effectiveness of mitigation strategies in meeting defined safety objectives and performance measures. The draft Risk Register is presented in Figure 4.

**FIGURE 4: DRAFT RISK REGISTER**

<b>EL METRO RISK REGISTER</b>						
REF ID	HAZARD	TYPE	REPORTED BY	REPORTED TO	LIKELIHOOD (A, B, C, D, E)	SEVERITY (1, 2, 3, 4)

As the SRM process progresses through the steps of identifying what may be wrong, what could happen as a result, and what steps El Metro is taking to resolve the risk and mitigate the hazard, the CSO completes and publishes the various components of the Risk Register. These components include the use of safety hazard identification, safety risk assessment, and safety risk mitigation, as described in the following sections.

## I. Safety Hazard Identification – 673.25(b)

El Metro has a Job Safety Checklist (Monthly Safety Walk Checklist) and a Safety Equipment Checklist, both of which are found in Section X of the *Safety Policy* (Appendix A). These checklists provide a means of regularly inspecting job sites and equipment to identify potential hazards before they result in negative safety outcomes. El Metro has a Hazard Communication Program located in Section 9 of the *General Rules, Regulations and Policies Employee Handbook*. This program is based on the requirements of the Occupational Safety Health Administration (OSHA)'s Hazard Communication Standard. In addition, El Metro's *Maintenance and Facility Plan* (Appendix A) details procedures for preventative maintenance for vehicles and facilities. Although the current procedures have been effective in achieving our safety objectives, to ensure compliance with 49 CFR Part 673, El Metro is working to implement the following expanded SRM hazard identification process.

The El Metro SRM hazard identification process is a forward-looking effort to identify safety hazards that could potentially result in negative safety outcomes. In the SRM process, a hazard is any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infra-structure of a public transportation system; or, damage to the environment.

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

- Through training and reporting procedures, LTMI ensures personnel can identify hazards and that each employee clearly understands that the employee has a responsibility to immediately report any safety hazards identified to the employee's supervisors. Continued training helps employees to develop and improve the skills needed to identify hazards.
- Employee hazard identification training (TAPTCO) coupled with the ESRP ensures that LTMI has full use of information from frontline employees for hazard identification.
- Upon receiving the hazard report, Supervisors/Leadership will communicate the identified hazard to the SMS Team and the CSO will register the hazard into the risk register for risk assessment, classification and mitigation.
- In carrying out the risk assessment, the CSO uses standard reporting forms (e.g. *Facility (Lessee) Inspection Work Sheet* (Appendix A) and *Fixed Route Trip Cards* to mitigate mechanical based safety hazards that are identified) and other reports completed on a routine basis by administrative, operations and maintenance. The LTMI *Employee Safety Reporting Program* (Appendix A) contains procedures for flagging and reporting hazards as a part of day-to-day operations using different avenues to report, anonymous or not.

- Supervisors are responsible for performing and documenting regular safety assessments, which include reporting and recommending methods to reduce identified hazards.
- LTMI uses incident reports and records to determine specific areas of training that need to be covered with employees to ensure safety hazard identification is continually improved, and thus ensure that hazards are identified before an event recurrence.
- Incident reports are also analyzed by the SMS team (Safety & Training Coordinator and Chief Safety Officer) to identify any recurring patterns or themes that would help to identify underlying hazards and root causes of the event that can be mitigated to prevent recurrence.
- The SMS Team uses the following forms for hazard identification and investigation for the purpose of finding causal factors and documenting the mitigations and the mitigation monitoring:
  - From the *ESRP*, the *LTMI\_Employee\_Safety\_Hazard\_Reporting\_Form* (AppendixA);
  - From the LTMI Workers' Compensation Policy and Procedure (Appendix A), the LTMI Employee Report of Injury 7 2020 and the LTMI Responding Supervisor's Investigation Report of Occupational Injury Form 7 2020;
  - From the *LTMI Accident and Incident Reporting and Investigation Standard Operating Procedures SOP-AIRIP-201* (Appendix A), the *LTMI\_Claims\_Notice\_5 2020*, *BUS\_ACCIDENT\_PASSENGER\_MANIFEST\_5 2017*, *SUPERVISORS\_REPORT\_OF\_INCIDENT7 2020*, *SUPERVISOR\_VEHICLE\_ACCIDENT\_REPORT 5 2020*, *LTMI\_HAZARD\_INVESTIGATOR\_FORM\_4 2020* and the *LTMI\_ACTION\_PLAN\_42020*;
  - for Mitigation Monitoring, the *DEMAND\_RESPONSE\_MITIGATION\_MONITORING\_FORMS\_7 2020* (Appendix A), *FIXED\_ROUTE\_MITIGATION\_MONITORING\_FORMS\_7 2020* (Appendix A), *TRANSIT\_CENTER\_MITIGATION\_MONITORING\_FORMS\_7 2020* (Appendix A), *MAINTENANCE\_DEPARTMENT\_MITIGATION\_MONITORING\_FORMS\_7 2020* and the *LTMI\_MITIGATION\_FOLLOW\_UP\_FORM 8.2020* (Appendix A).
- If a hazard is such that an employee would be reluctant to report the information due to perceived negative consequences (e.g. disciplinary action), alternative, anonymous reporting mechanisms are available through an anonymous suggestion box outside Operations Department Offices, or anonymous online reporting form [www.elmetrotransit.com](http://www.elmetrotransit.com) , or other secure mechanism.
- To increase the safety knowledge of our agency, the CSO, key safety personnel, SPAC Committee and qualified personnel from the respective department are also encouraged to participate in available professional development activities and peer-to-peer exchanges as a source of expertise and information on lessons learned and best practices in hazard identification.

Other sources for hazard identification include:

- ESRP;
- Review of vehicle camera footage;
- Review of monthly performance data and safety performance targets;
- Observations from supervisors;
- Maintenance reports;
- Comments from customers, passengers, and third parties, including LTMI's transit insurance pool and vendors;
- Blue Cross Blue Shield of Texas Reports;
- Safety Planning Advisory Committee meetings, SMS Committee meetings, Operations meetings and Maintenance meetings;
- Results of audits and inspections of vehicles and facilities;
- Results of training assessments;
- Investigations into safety events, incidents, and occurrences
- Inspections of personnel job performance, vehicles, facilities and other data
- Safety trend analysis on data currently collected
- Training and evaluation records
- Internal safety audits

External sources of hazard information could include:

- FTA and other federal or state authorities;
- Reports from the public;
- Safety bulletins from manufacturers or industry associations.

When a safety concern is observed by LTMI's management or supervisory personnel, whatever the source, it is reported to LTMI's SMS Team. Procedures for reporting hazards to LTMI's SMS Team are reviewed yearly and recommendations are made by the LTMI Leadership Committee. LTMI's SMS Team also receives employee reports from the ESRP, customer comments related to safety, internal/external inspections and safety event reports. LTMI's Chief Safety Officer reviews these sources for hazards and documents them in LTMI's Safety Risk Register. LTMI's Chief Safety Officer also may enter hazards into the Safety Risk Register based on their review of LTMI's operations and maintenance, the results of audits and observations, and information received from FTA and other oversight authorities, as well as the National Transportation Safety Board. LTMI's Chief Safety Officer may conduct further analyses of hazards and consequences entered into the Safety Risk Register to collect information and identify additional consequences and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, LTMI's SMS Team may:

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

LTMI's SMS Team will then prepare an agenda to discuss identified hazards and consequences with the Safety Planning Advisory Committee during Quarterly meetings. This agenda may include additional background on the hazards and consequences, such as the results of trend analysis, vehicle camera footage, vendor documentation, reports and observations, or information supplied by FTA or other oversight authorities.

Any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately be brought to the attention of the Accountable Executive and addressed through the SRM process for safety risk assessment and mitigation. This means that the Chief Safety Officer believes immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of Environmental Protection Agency or Any State environmental protection standards. Otherwise, the Safety Risk Assessment Team will prioritize hazards for further SRM activity.

In addition to identifying the hazard, the hazard identification process also classifies the hazard by type (organizational, technical or environmental) to assist the CSO in identifying the optimal combination of departmental leadership and qualified personnel from the respective department to select in assembling the safety risk assessment team.

The various hazard types can also be categorized by subcategory for each type. For example, organizational hazards can be subcategorized into resourcing, procedural, training or supervisory hazards. Each of the subcategories implies different types of mitigation strategies and potentially affect overall agency resources through varying costs for implementation. Technical hazards can be subcategorized into operational, maintenance, design and equipment. Additionally, environmental hazards can be subcategorized into weather and natural, which is always a factor for every operation.

## **II. Safety Risk Assessment – 673.25(c)**

As part of the new SRM process, El Metro has developed methods to assess the likelihood and severity of the consequences of identified hazards, and prioritizes the hazards based on the safety risk. The process continues the use of the Risk Register described in the previous section to address the next two components.

To accurately assess a risk, El Metro may need to perform an investigation. El Metro currently investigates accidents or crashes in accordance to the *LTM/ Employee Accident / Incident Investigation and Reporting Standard Operating Procedures SOP-AIIP-201* (Appendix A) but will need to develop a full investigation procedure to inform the SRM process. The investigation procedure will start with *LTM/ Employee Accident / Incident Investigation and Reporting Standard Operating Procedures SOP-AIIP-201* and the framework found in the *General Rules, Regulations and Policies Employee Handbook* and will be developed to cover all risk assessment. Once fully developed, the document will become the Investigation SOP. The SOP will include accident investigation procedures as well as risk investigation procedures. These procedures will be used to investigate risks identified from multiple sources including the ESRP.

Safety risk is based on an assessment of the likelihood of a potential consequence and the potential severity of the consequences in terms of resulting harm or damage. The risk assessment also considers any previous mitigation efforts and the effectiveness of those efforts. The results of the assessment are used to populate the sixth and seventh components of the Risk Register as presented in Figure 5.

**FIGURE 5: SAFETY RISK ASSESSMENT STEPS IN POPULATING THE RISK REGISTER**

<b>EL METRO RISK REGISTER</b>						
REF ID	HAZARD	TYPE	REPORTED BY	REPORTED TO	LIKELIHOOD (A, B, C, D, E)	SEVERITY (1, 2, 3, 4)

LTMI assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk.

The LTMI Safety Risk Assessment Team assess prioritized hazards using LTMI’s Safety Risk Matrix (Appendix). This matrix expresses assessed risk as a combination of one severity category and one likelihood level, also referred to as a *hazard rating*. For example, a risk may be assessed as “1A” or the combination of a Catastrophic (1) severity category and a Frequent (A) probability level.

**Figure 6. Safety Risk Assessment Matrices**

Safety Risk Assessment Matrix		
Severity Categories		
Description	Severity Category	Criteria
<b>Critical</b>	<b>1</b>	<p>Could result in one or more of the following:</p> <ul style="list-style-type: none"> <li>• Death</li> <li>• Multiple serious injuries requiring hospitalization</li> <li>• Irreversible environmental impact</li> <li>• Accident or Incident with a Monetary loss equal to or exceeding \$10,000.00</li> </ul>
<b>High</b>	<b>2</b>	<p>Could result in one or more of the following:</p> <ul style="list-style-type: none"> <li>• Serious injury requiring hospitalization for more than 48 hours, commencing within 7 days from the date of event.</li> <li>• Reversible significant environmental impact</li> <li>• Accident or Incident with a Monetary loss equal to or exceeding \$5,000.00 but not exceeding 10,000</li> </ul>
<b>Medium</b>	<b>3</b>	<p>Could result in one or more of the following:</p> <ul style="list-style-type: none"> <li>• Injury requiring immediate transport away from the scene for medical attention (1 or more persons) that may result in one (1) or more lost work day(s)</li> <li>• Reversible moderate environmental impact</li> <li>• Accident or Incident with a Monetary loss equal to or exceeding \$500 but not exceeding \$5,000.00</li> </ul>
<b>Low</b>	<b>4</b>	<p>Could result in one or more of the following:</p> <ul style="list-style-type: none"> <li>• Injury requiring first aid</li> <li>• Minimal environmental impact</li> <li>• Accident or Incident with a Monetary loss less than \$500</li> </ul>



<b>Likelihood Levels</b>			
<b>Description</b>	<b>Level</b>	<b>Individual item</b>	<b>System or Vehicle Fleet</b>
<b>Frequent</b>	<b>A</b>	Likely to occur often in the life of an item.	Continuously experienced. Potential consequence may be experienced greater than or equal to once in 10,833 to 71,624 vehicle revenue miles (VRM).
<b>Probable</b>	<b>B</b>	Will occur several times in the life of an item.	Will occur frequently. Potential consequence may be experienced less than twice 21,667 to 143,250 VRM.
<b>Occasional</b>	<b>C</b>	Likely to occur sometime in the life of an item.	Will occur several times. Potential consequence may be experienced once per 65,001 to 429,750 VRM.
<b>Remote</b>	<b>D</b>	Unlikely, but possible to occur in the life of an item.	Unlikely but can reasonably be expected to occur. Potential consequence may be experienced once per 130,000 to 859,500 VRM.
<b>Improbable</b>	<b>E</b>	So unlikely, it can be assumed occurrences may not be experienced in the life of an item.	Unlikely to occur, but possible. Potential consequence may be experienced less than once per 260,000 to 1,719,000 VRM.

<b>Risk Assessment Matrix</b>				
<b>Severity</b>	<b>Critical</b>	<b>High</b>	<b>Medium</b>	<b>Low</b>
<b>Likelihood</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Frequent - A</b>	<b>HIGH - 1A</b>	<b>HIGH - 2A</b>	<b>HIGH - 3A</b>	<b>MEDIUM - 4A</b>
<b>Probable - B</b>	<b>HIGH - 1B</b>	<b>HIGH - 2B</b>	<b>MEDIUM - 3B</b>	<b>MEDIUM - 4B</b>
<b>Occasional - C</b>	<b>HIGH - 1C</b>	<b>MEDIUM - 2C</b>	<b>MEDIUM - 3C</b>	<b>LOW - 4C</b>
<b>Remote - D</b>	<b>MEDIUM - 1D</b>	<b>MEDIUM - 2D</b>	<b>LOW - 3D</b>	<b>LOW - 4D</b>
<b>Improbable - E</b>	<b>LOW - 1E</b>	<b>LOW - 2E</b>	<b>LOW - 3E</b>	<b>LOW - 4E</b>

**Figure 7. Safety Risk Acceptance Actions.**

High = Unacceptable	Risk intolerable, requires action from LTMI Accountable Executive and Chief Safety Officer to mitigate the safety risk immediately,
Medium = Review	Risk reduction/mitigation must be considered. Where risk reduction/mitigation is not practical or viable, acceptance by Accountable Executive is required.
Low = Acceptable	Risk is considered acceptable but would be reviewed if reoccurs.

This matrix also categorizes combined risks into levels, High, Medium, or Low, based on the likelihood of occurrence and severity of the outcome.

For purposes of accepting risk:

- “High” hazard ratings will be considered unacceptable and require action from LTMI Accountable Executive and Chief Safety Officer to mitigate the safety risk immediately,
- “Medium” hazard ratings will be considered undesirable and require LTMI’s SMS Team and Safety Risk Assessment Team to make a decision regarding their acceptability. Where risk reduction/mitigation is not practical or viable, acceptance by Accountable Executive is required., and
- “Low” hazard ratings may be accepted by the Chief Safety Officer without additional review but monitored by the respective department.
- Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk.

Once sufficient information has been obtained, the Chief Safety Officer will facilitate completion of relevant sections of the Safety Risk Register, using the LTMI Safety Risk Assessment Matrix. The Safety Risk Assessment Team may seek support from the SMS Committee in obtaining additional information to support the safety risk assessment. The Chief Safety Officer will document the safety risk assessment, including hazard rating and mitigation options for each assessed safety hazard in the Safety Risk Register.

The SMS Team will schedule safety risk assessment activities with the qualified person from the respective department and prepare a Safety Risk Assessment Package. The SMS Team will present the Safety Risk Assessment Package in the SMS Committee meeting, Operations meeting, Maintenance meeting and Safety Planning Advisory Committee meeting. This package is distributed at least one week (Approx.) in advance of the meetings. During the meeting, the SMS Team reviews the hazard and its consequence(s) and reviews available information distributed in the Safety Risk Assessment Package on severity and likelihood.

The Risk Assessment Matrix is an important tool. If a risk is assessed and falls within one of the red zones, the risk is determined to be unacceptable under existing circumstances. This determination means that management must act to mitigate the situation. This is the point in the process when Safety Risk Mitigations are developed. If the risk is assessed and falls within one of the yellow zones, the risk is determined to be acceptable, but monitoring is necessary. If the risk falls within one of the green zones, the risk is acceptable under the existing circumstances.

The Chief Safety Officer will maintain on file all Safety Committee agendas, Safety Risk Assessment Packages, additional information collection, and completed Safety Risk Register sections for a period of three years from the date of generation.

### **III. Safety Risk Mitigation – 673.25(d)**

The El Metro *Safety Policy* (Appendix A) contains a list of Basic Safety Rules that help to mitigate potential risks that may be present in the day-to-day operations of the agency. This list includes rules such as:

- All personnel will be required to attend safety meetings;
- Warning signs, barricades, and tags will be used to the fullest extent and shall be obeyed; and
- Horseplay on the jobsite is strictly prohibited.

El Metro also has several SOPs/policies/programs in place to help mitigate and prevent potential risks. These include, but are not limited to:

- Aerial Platform and Scissor Lift SOP;
- Powered Industrial Truck SOP;
- Electrical Safety Program; and
- Personal Protective Equipment SOP.

LTMI's Accountable Executive and Chief Safety Officer review current methods of safety risk mitigation and establish methods or procedures to mitigate or eliminate safety risk associated with specific hazards based on recommendations from the SMS Committee and Safety Planning Advisory Committee. LTMI can reduce safety risk by reducing the likelihood and/or severity of potential consequences of hazards.

Prioritization of safety risk mitigations is based on the results of safety risk assessments. LTMI's Chief Safety Officer tracks and updates safety risk mitigation information in the Safety Risk Register and makes the Register available to the SMS Committee and Safety Planning Advisory Committee during meetings and to LTMI staff, employees and Contractors upon request.

In the Safety Risk Register, LTMI's Chief Safety Officer will also document any specific measures or activities, such as reviews, observations or audits that will be conducted to monitor the effectiveness of mitigations once implemented (Follow up).

Over the next year, LTMI will provide Instruction-Led Training on Safety Risk Mitigation Process and Procedures to all key personnel and Department Heads.

In addition, as part of the *Employee Safety Reporting Program* (Appendix A), El Metro management and supervisors review all injury and illness documentation annually to analyze occurrences, identify trends, and plan courses of corrective action.

Upon completion of the risk assessment, the CSO, Safety and Training Coordinator and subject matter experts continue populating the Risk Register by identifying mitigations or strategies necessary to reduce the likelihood and/or severity of the consequences. The goal of this step is to avoid or eliminate the hazard or, when elimination is not likely or feasible, to reduce the assessed risk rating to an acceptable level. However, mitigations do not typically eliminate the risk entirely.

To accomplish this objective, the CSO, through the safety risk management team, works with qualified personnel from the respective department or section to which the risk applies. The risk management team then conducts a brainstorming exercise to elicit feedback from staff and supervisors with the highest level of expertise in the components of the hazard.

Documented risk resolution and hazard mitigation activities from previous Risk Register entries and the resolution's documented level of success at achieving the desired safety objectives may also be reviewed and considered in the process. If the hazard is external (e.g., roadway construction by an outside agency) information and input from external actors or experts may also be sought to take advantage of all reasonably available resources and avoid any unintended consequences.

Once a mitigation strategy is selected and adopted, the strategy is assigned to an appropriate staff member or team for implementation. The assigned personnel and the personnel's specific responsibilities are entered into the Risk Register. Among the responsibilities of the mitigation team leader is the documentation of the mitigation effort, including whether the mitigation was carried out as designed and whether the intended safety objectives were achieved. This information is recorded in the Risk Register for use in subsequent SA activities and to monitor the effectiveness of the SRM program.

## **B. Safety Assurance – 673.27 (a)**

Safety Assurance means processes within the El Metro Safety Management System that function to ensure a) the implementation and effectiveness of safety risk mitigation, and b) El Metro meets or exceeds our safety objectives through the collection, measurement, analysis and assessment of information.

SA helps to ensure early identification of potential safety issues. SA also ensures that safeguards are in place and are effective in meeting critical El Metro safety objectives and contribute towards SPTs.

Through our Safety Assurance process, LTMI:

- Evaluates our compliance with operations and maintenance procedures to determine whether our existing rules and procedures are sufficient to control our safety risk;

- Assesses the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended;
- Investigates safety events to identify causal factors; and
- Analyzes information from safety reporting, including data about safety failures, defects, or conditions.

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

- Safety audits,
- Informal inspections,
- Regular review of onboard camera footage from accident to assess drivers and specific incidents,
- Safety surveys,
- ESRP,
- Investigation of safety events,
- Daily data gathering and monitoring of data related to the delivery of service, and
- Regular vehicle inspections and preventative maintenance.

Results from the above processes are compared against recent performance trends quarterly by the SMS Committee to determine where action needs to be taken. Upon approval by the SMS Committee, the SMS Team will enter any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for re-evaluation.

LTMI monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The Chief Safety Officer maintains a list of safety risk mitigations in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

The Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate director, manager, or supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports; conducting job performance observations; or other activities (Form used for performance monitoring attached in Appendix B). The Chief Safety Officer will attempt to make use of existing LTMI processes and activities before assigning new information collection activities.

LTMI's SMS Team and Safety Planning Advisory Committee review the performance of individual safety risk mitigations during bimonthly Safety Planning Advisory Committee meetings, based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the SMS Team and Safety Planning Advisory Committee will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify this proposed course of action and oversee its execution.

LTMI's SMS Team also monitor LTMI's operations on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by:

- Reviewing results from accident, incident, and occurrence investigations;
- Monitoring employee safety reporting;
- Reviewing results of internal safety audits and inspections; and
- Analyzing operational and safety data to identify emerging safety concerns.

The Chief Safety Officer works with the Safety and Training Coordinator and Accountable Executive to carry out and document all monitoring activities.

LTMI maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event (see LTMI Safety Event Reporting and Investigation Procedures Manual for specific procedures for Reporting and conducting safety investigations). These procedures also reflect all traffic safety reporting and investigation requirements established by Texas Department of Transportation.

The SMS Team maintains all documentation of LTMI's investigation policies, processes, forms, checklists, activities, and results. As detailed in LTMI's procedures, an investigation report is prepared and sent to the SMS Team for integration into their analysis of the event.

LTMI's SMS Team will determine whether:

- The accident was preventable or non-preventable;
- Personnel require discipline or retraining;
- The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event; and
- The accident appears to involve underlying organizational causal factors beyond just individual employee behavior.

The SMS Team routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the SMS Team ensure that the concerns are investigated or analyzed through LTMI's SRM process.

The SMS Team also review internal and external reviews, including audits and assessments, with findings concerning LTMI's safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.

## **I. Safety Performance Monitoring and Measuring – 673.27 (b)**

As the first step in the El Metro SA program, El Metro collects and monitors data on safety performance indicators through a variety of mechanisms described in the following sections. Safety performance indicators can provide early warning signs about safety risks. El Metro currently relies primarily on lagging indicators representing negative safety outcomes that should be avoided or mitigated in the future. However, initiatives are underway to adopt a more robust set of leading indicators that monitor conditions that are likely to contribute to negative outcomes in the future. In addition to the day-to-day monitoring and investigation procedures detailed below, El Metro will review and document the safety performance monitoring and measuring processes as part of the annual update of this ASP.

### **MONITORING COMPLIANCE AND SUFFICIENCY OF PROCEDURES – 673.27 (B)(1)**

El Metro monitors our system for personnel compliance with operations and maintenance procedures and also monitors these procedures for sufficiency in meeting safety objectives. A list of documents describing the safety related operations and maintenance procedures cited in this ASP is provided in Appendix A of this document.

Supervisors monitor employee compliance with El Metro standard operating procedures through direct observation and review of information from internal reporting systems such as the *Employee Safety Reporting Program* and *Customer Comment/Complaint Procedure and Record Retention Policy* (Appendix A) from both employees and customers.

El Metro addresses non-compliance with standard procedures for operations and maintenance activities through a variety of actions, including revision to training materials and delivery of employee and supervisor training if the non-compliance is systemic. If the non-compliance is situational, then activities may include supplemental individualized training, coaching, and heightened management oversight, among other remedies.

Sometimes personnel are fully complying with the procedures, but the operations and maintenance procedures are inadequate and pose the risk of negative safety outcomes. In this case, the cognizant person submits the deficiency or description of the inadequate procedures to the SRM process. Through the SRM process, the SRM team will then evaluate and analyze the potential organizational hazard and assign the identified hazard for mitigation and resolution, as appropriate. The SRM team will also conduct periodic self-evaluation and mitigation of any identified deficiencies in the SRM process itself.

## **MONITORING OPERATIONS – 673.27(B)(2)**

Department Heads are required to monitor investigation reports of safety events and SRM resolution reports to monitor the department’s operations to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended. If it is determined that the safety risk mitigation did not bring the risk to an acceptable level or otherwise failed to meet safety objectives, then the Department Head resubmits the safety risk/hazard to the SRM process. The CSO will work with the Safety & Training Coordinator and qualified personnel from the respective department to re-analyze the hazard and consequences and identify additional mitigation or alternative approaches to implementing the mitigation.

## **II. Safety Event Investigation – 673.27(B)(3)**

El Metro currently conducts investigations of safety events. From a SA perspective, the objective of the investigation is to identify causal factors of the event and to identify actionable strategies that El Metro can employ to address any identifiable organizational, technical or environmental hazard at the root cause of the safety event.

El Metro uses the After-Accident Investigation procedure located in the *General Rules, Regulations and Policies Employee Handbook*, the *LTMI Employee Accident / Incident Investigation and Reporting Standard Operating Procedures SOP-AIIP-201* and the *LTMI Workers’ Compensation Policy and Procedure* to identify safety and operational risks based on individual assets.

Safety Event Investigations that seek to identify and document the root cause of an accident or other safety event are a critical component of the SA process because they are a primary resource for the collection, measurement, analysis and assessment of information. El Metro gathers a variety of information for identifying and documenting root causes of accidents and incidents, including but not limited to:

- Stop, identify yourself and Radio Dispatch immediately giving them the location and your bus number. (A Supervisor or Dispatcher will call the Police and Ambulance when necessary). Employees are required to report all accidents/incidents within five (5) minutes after the occurrence. Dispatch will notify the Safety and Training Coordinator and a Route Supervisor of the accident/incident.
- Assist the injured person, but do not move them except to avoid danger. Use extreme care and protect yourself avoiding contact with bodily fluids.
- Secure full names, addresses, and telephone numbers of:
  - a. Passengers
  - b. Other driver
  - c. Injured persons
  - d. Witnesses
- Make a sketch showing names of streets, positions of cars, and direction of traffic at the time of the accident.
- Do not argue, accuse, nor give statements to the media or bystanders.



- Do not discuss the mechanical condition of the vehicle with anyone except Company Supervisory personnel
- Refer the operator for required drug and alcohol testing in compliance with 49 CFR § 655.44 Post-accident testing, if the safety event meets the definition of accident in 49 CFR §655.44.
- Dispatcher on duty or Route Supervisor will give the Operator an incident report to complete before the Operator leaves that day. Dispatcher will transmit the Operator's report to the Safety & Training Coordinator.
- The CSO and the Safety & Training Coordinator, working with qualified personnel from the respective department, evaluate the incident reports and other available information to determine the root cause of the accident/event. Follow up with driver or other cognizant parties may be necessary to elicit additional information.
- The CSO identifies any hazards noted in the incident report and refers those hazards to the SRM process.

After the accident has been cleared up by law enforcement, an employee shall not leave the scene until released by Dispatcher or Supervisor. It is extremely important that the employee creates a complete, specific, and legible report. The employee must complete and submit the report of the accident by the end of his/her work schedule. A complete, specific, and legible report must be made for every accident or incident, however slight, which occurs on or near a company vehicle in case of a passenger or pedestrian accident; even if the person involved declines to give his name or states that he is unhurt, a full report should be made.

The El Metro *Drug and Alcohol Policy* (Appendix A) requires that any accidents resulting in a fatality will subject any involved El Metro employee to post-accident drug and alcohol testing. The policy also provides the conditions under which employees will be subject to post-accident drug and alcohol testing following an accident resulting in no fatalities.

In addition, the *General Rules, Regulations and Policies Employee Handbook* contains procedures for how to react to and report other more specific incidents, such as hit and runs, fires on vehicles, and disabled vehicles.

### **MONITORING INTERNAL SAFETY REPORTING PROGRAMS – 673.27(B)(4)**

As a primary part of the internal safety reporting program, our agency monitors information reported through the ESRP. When a report originating through the complaint process documents a safety hazard, the supervisor submits the hazards identified through the internal reporting process, including previous mitigation in place at the time of the safety event. The supervisor submits the hazard report to the SRM process to be analyzed, evaluated and, if appropriate, assigned for mitigation/resolution.

## OTHER SAFETY ASSURANCE INITIATIVES

Because leading indicators can be more useful for safety performance monitoring and measurement than lagging indicators, El Metro is undertaking efforts to implement processes to identify and monitor more leading indicators or conditions that have the potential to become or contribute to negative safety outcomes. This may include trend analysis of environmental conditions through monitoring National Weather Service data; monitoring trends toward or away from meeting the identified SPTs; or other indicators as appropriate.

### C. Safety Promotion – 673.27

Management support is essential to developing and implementing SMS. SP includes all aspects of how, why, when and to whom management communicates safety related topics. SP also includes when and how training is provided. The following sections outline both the safety competencies and training that El Metro will implement and how safety related information will be communicated.

#### I. Safety Competencies and Training – 673.29(a)

El Metro provides comprehensive training to all employees regarding each employee's job duties and general responsibilities. This training includes safety responsibilities related to the employee's position. In addition, regular Operations and Maintenance safety meetings are held to ensure that safety related information is relayed to the key members of our agency's safety processes.

As part of SMS implementation, El Metro will be conducting the following activities:

- Conduct a thorough review of all current general staff categories (administrative, driver, supervisor, mechanic, maintenance, etc.) and the respective staff safety related-responsibilities.
- Assess the training requirements spelled out in 49 CFR Part 672 and the various courses required for different positions. (El Metro is not subject to the requirements under 49 CFR Part 672 but will review the training requirements to understand what training is being required of other larger agencies in the event these trainings might be useful).
- Assess the training material available on the FTA PTASP Technical Assistance Center website.
- Review other training material available from industry sources such as the Community Transportation Association of America and the American Public Transportation Association websites.
- Develop a set of competencies and trainings required to meet the safety related activities for each general staff category.
- Develop expectations for ongoing safety training and safety meeting attendance.
- Develop a training matrix to track progress on individuals and groups within the organization.

- Adjust job notices associated with general staff categories to ensure that new personnel understand the safety related competencies and training needs and the safety related responsibilities of the job.
- Include refresher training in all trainings and apply it to agency personnel and contractors.

LTMI SMS implementation is important and the CSO is the resource person for providing a corporate perspective on LTMI's approach to safety management. OSHA, FTA, TXDOT and SMS training will be provided to key personnel and all Department Heads. Courses, conferences or training seminars will include but are not limited to:

- Defensive driver training
- Behind-the-wheel training
- On-the-job training for maintenance functions
- Occupational safety training
- Informal staff meetings
- Webinars
- Formal certification from accredited institutions
- Other forms of training required for employees and contractors designated as "directly responsible for safety"

Safety Management training topics may include:

- **Initial Safety Training for All Staff**
  - Basic principles of safety management including the integrated nature of SMS, risk management, safety culture, etc.
  - Corporate safety goals and objectives, safety policy, and safety standards
  - Importance of complying with the safety policy and SMS procedures, and the approach to disciplinary actions for different safety issues
  - Organizational structure, roles and responsibilities of staff in relation to safety
  - Transit agency's safety record, including areas of systemic weakness
  - Requirements for ongoing internal assessment of organization safety performance (e.g. employee surveys, safety audits, and assessments)
  - Reporting accidents, incidents, and perceived hazards
  - Lines of communication for safety managers
  - Feedback and communication methods for the dissemination of safety information
  - Safety promotion and information dissemination

- **Safety Training for Operations and Maintenance Personnel**
  - Unique hazards facing operational personnel
  - Seasonal safety hazards and procedures (e.g. winter/Summer operations)
  - Procedures for hazard reporting
  - Procedures for reporting safety events (accidents and incidents)
  - Emergency procedures
  - De-escalation training
  - Assault Awareness and Prevention for Transit Operators/Workers
  
- **Safety Training for Key Personnel and Department Heads**
  - Principles of the SMS
  - Management responsibilities and accountabilities for safety
  - Legal issues (e.g. liability)
  
- **Training for the Chief Safety Officer and Safety & Training Coordinator**
  - Familiarization with different transit modes, types of operation, routes, etc.
  - Understanding the role of human performance in safety event causation and prevention
  - Operation of the SMS
  - Investigating safety events
  - Crisis management and emergency response planning
  - Safety promotion
  - Communication skills
  - Performing safety audits and assessments
  - Monitoring safety performance
  - National Transit Database (NTD) safety event reporting requirements

## II. Safety Communication – 673.29(b)

LTMI's SMS Team coordinate LTMI's safety communication activities for the SMS. LTMI's Communication activities focus on the three categories of communication activity established in 49 CFR Part 673 (Part 673):

- **Communicating safety and safety performance information throughout the agency:** LTMI communicates information on safety and safety performance in all Safety Planning Advisory Committee meetings and during quarterly SMS Committee Meetings. LTMI also has a permanent agenda item in all Operations and Maintenance Meetings dedicated to safety. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact LTMI's service or safety performance, and updates regarding SMS implementation. LTMI also requests information from drivers during these meetings, which is recorded in meeting minutes. Finally, LTMI's Safety and Training Coordinator posts safety bulletins and flyers on the bulletin boards located in all bus operator and maintenance technician break rooms, advertising safety messages and promoting awareness of safety issues.

- **Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency:** As part of new-hire training, LTMI distributes all respective safety policies and procedures, to all employees. LTMI provides training on these policies and procedures and discusses them during safety talks between Administration, Supervisors, Operators and Maintenance. For newly emerging issues or safety events at the agency, LTMI's Chief Safety Officer issues bulletins or messages to employees that are reinforced by supervisors in using Be Safe or group discussions with employees.
- **Informing employees of safety actions taken in response to reports submitted through the ESRP:** LTMI provides targeted communications to inform employees of safety actions taken in response to reports submitted through the ESRP, including handouts and flyers, safety talks, updates to bulletin boards, Safety Planning Advisory Committee meetings, safety meetings, Be Safe and one-on-one discussions between employees and supervisors.

El Metro regularly communicates safety and safety performance information throughout our agency's organization that, at a minimum, conveys information on hazards and safety risks relevant to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through the ESRP (noted in Section 3.A.I) or other means.

Over the next year, LTMI will have a staff meeting to discuss Safety Communication Processes and Methods.

Methods of communication are:

- New Employee Orientation;
- Driver's Training;
- Internal Marketing Strategies;
- Instructor-Led Training;
- Safety Meetings;
- El Metro Toolbox Talk (Safety Bulletin);
- Safety Planning Advisory Committee;
- Staff Meetings;
- Department bulletin boards;
- Employee handbooks;
- Safety plans and strategies are communicated throughout the organization to all personnel; and
- Significant events and investigation outcomes associated with the organization are communicated to all personnel, including contracted organizations where appropriate.

Safety plans and strategies are communicated throughout the organization to all personnel. Organizational roles and duties in SMS are presented and explained to SMS key staff. Significant events and investigation outcomes associated with the LTMI are communicated to all personnel, contracted organizations and the Union where appropriate.

El Metro reports any safety related information to the Laredo Mass Transit Board at their regular meetings and will begin including safety performance information. In addition, El Metro holds regularly scheduled meetings with drivers to ensure that any safety related information is passed along that would affect the execution of the drivers' duties. El Metro also posts safety related and other pertinent information in a common room for all employees at all worksites and holds monthly safety and training meetings with all employees.

El Metro will begin systematically collecting, cataloging, and, where appropriate, analyzing and reporting safety and performance information to all staff. To determine what information should be reported, how the information should be reported and to whom, El Metro will answer the following questions:

- What information does this individual need to do their job?
- How can we ensure the individual understands what is communicated?
- How can we ensure the individual understands what action must be taken as a result of the information?
- How can we ensure the information is accurate and kept up-to-date?
- Are there any privacy or security concerns to consider when sharing information? If so, what should we do to address these concerns?

In addition, El Metro will review our current communications strategies and determine whether others are needed. As part of this effort, El Metro has conducted, and will continue to conduct, a Safety Culture Survey to understand how safety is perceived in the workplace and what areas El Metro should be addressing to fully implement a safety culture at our agency.

## **5. Safety Reduction Program – 673.27(a)**

**I. Vehicular and Pedestrian Accidents** - Part 673. 49 U.S.C 5329 (d)(1)(I) The safety risk assessment process will be used to assess the safety risks associated with vehicular and pedestrian accidents. This program will assist in reducing the likelihood of risk in transit operations and improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the National Transit Database.

**II. Assault on Transit Workers** - 49 U.S.C. 5329(d)(1)(I)(ii) As noted in the statute, assault mitigation infrastructure and technology include barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators. El Metro comprehensive agency safety plan includes... (I) a risk reduction program ... including... (ii) the mitigation of assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on buses, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators when a risk analysis performed by the safety committee ... determines that such barriers or other measures would reduce assaults on transit workers and or injuries to transit workers.

**III. Risk Reduction Performance Targets** – Part 67 49 U.S.C. 5329(d)(1)(H) El Metro will add SPT’s when published by the national transit database (NTD) under section 5335. In order to reflect the broad and varied nature of risk reduction performance, the recipient may review and choose to adopt the 3- year rolling average as a goal to maintain the current level of risk reduction while addressing new Part 673 requirements.

**6. Public Health** – CFR 49 U.S.C. 5329(d)(1)(D) El Metro aim to prevent diseases, disability, and death cause by a wide range of exposure to infectious diseases. Consistent with guidelines of the center for disease control prevention and or state/local health authority to minimize exposure to infectious diseases, El Metro has in place the Pandemic Response to infectious diseases Plan. Through the process described in the agency’s safety plan SMS process, El Metro will continue to identify and implement strategies to minimize the exposure of the public, personnel, and the property to hazards and unsafe conditions though the elimination, prevention, and control of infectious diseases.

## 7. Appendix A

**TABLE 8: PTASP SUPPORTING DOCUMENTS**

File Name	Revision Date
Accidents Incidents 2018.xlsx	2018
CIRCULATOR C1, C2 & C3 Bifold.pdf	2024
COA 2015 Report.pdf	November, 2005
Customer Reporting Procedures.pdf	July, 2018
Drug and Alcohol Policy.pdf	1/15/2019
El Metro 2016 Transit Develop Appendix C.pdf	2016
El Metro 2016 Transit Development Plan.pdf	2016
El Metro 2016 Transit Development Plan Appendix A.pdf	2016
El Metro 2016 Transit Development Plan Appendix B.pdf	2016
El Metro 2016 Transit Development Plan Chapter 1.pdf	2016
El Metro 2016 Transit Development Plan Chapter 2.pdf	2016
El Metro 2016 Transit Development Plan Chapter 3.pdf	2016
El Metro 2016 Transit Development Plan Chapter 4.pdf	2016
El Metro 2016 Transit Development Plan Chapter 5.pdf	2016
El Metro 2016 Transit Development Plan Chapter 6.pdf	2016
El Metro 2016 Transit Development Plan Chapter 7.pdf	2016

File Name	Revision Date
City of Laredo IST Information Security Response Plan 5.5.2020	4/22/2019
Cybersecurity Training Certification (STV-4918) 8.14.2020	
El Metro 2016 Transit Development Plan Chapter 8.pdf	2016
El Metro 2016 Transit Development Plan Chapter 9.pdf	2016
El Metro 2016 Transit Development Plan Executive Summary.pdf	2016
El Metro Overview.docx	
El Metro Safety Policy 9 19 2019.doc	9/19/2019
El Metro TAMP Appendix A.pdf	
El Metro TAMP Appendix B.pdf	
El Metro TAMP Chapter 1.pdf	January, 2017
El Metro TAMP Chapter 2.pdf	January, 2017
El Metro TAMP Chapter 3.pdf	January, 2017
El Metro TAMP Chapter 4.pdf	January, 2017
El Metro TAMP Chapter 5.pdf	January, 2017
El Metro TAMP_Combined.pdf	January, 2017
El Metro Vehicle Listing FY 18-19_Updated 6-20.19_Granados Copy.xlsx	6/20/2019
Employee Handbook 8-08-2017 final.docx	July, 2017
Ethics and Compliance Program.pdf	7/21/2017



File Name	Revision Date
FTA 2018 TRIENNIAL FINAL REPORT.pdf	6/11/2018
Information Security Incident Response Plan.pdf	4/22/2019
Job Descriptions.pdf	
Laredo EL Metro Asset Inventory 022717.xlsm	2/27/2017
Laredo Mass Transit Board.docx	
Laredo Transit Management and Teamsters 657 2018-21 CBA.pdf	10/1/2018
Laredo Transit Management, Inc - 2017 Agency Profile.pdf	2017
Laredo_MPO_Boundary_Map.pdf	December, 2007
LTMI Aerial Platform and Scissor Lift Spore 9-19-19.docx	10/8/2019
LTMI Bloodborne Exposure Control_Rev_9-19-19.doc	June, 2017
LTMI Electrical Safety Program_9-20-19.docx	10/8/2019
LTMI Emergency Action Plan_9-20-19.docx	10/8/2019
LTMI Employee Accident Incident Investigation and Reporting SOP.docx	3/18/2020
LTMI_EMPLOYEE_SAFETY_REPORTING_PROGRAM 3 9 2020.docx	3/9/2020
LTMI Fall Protection Policy_9-20-19.docx	10/8/2019
LTMI Funding Sources.docx	2019
LTMI Hazard Communication_9-20-19.docx	1/1/2015
LTMI Lockout Tagout_9-20-19.docx	1/27/2006
LTMI Powered Industrial Truck Spore 9-19-19.docx	9/19/2019

File Name	Revision Date
LTMI PPE Polacre 9-19-19.docx	10/8/2019
LTMI Purchasing Policy Revised Oct 2, 2018_Tri2018_PDF.pdf	10/2/2018
LTMI Respiratory Protection Program_9-20-19.docx	10/8/2019
LTMI_SAFETY_PERFORMANCE_2 10 2020.xlsx	2/10/2020
Maintenance & Facility Plan Updated 8-8-18_pdf Format (1).pdf	8/8/2018
MOU- LAREDO MPO-TXDOT-TRANSIT - 2018- EXECUTED.pdf	2/20/2018
MPO.pdf	
EL_METRO_ORGANIZATIONAL_CHART 1.8.2021 (3) (2).docx	1/8/2021
Performance Measures.pdf	
Route 1 Bifold.pdf	
Route 2A Bifold.pdf	
Route 2B Bifold.pdf	
Route 3 Bifold.pdf	
Route 4 Bifold.pdf	
Route 5 Bifold.pdf	
Route 6 Bifold.pdf	
Route 7 Bifold.pdf	
Route 8A Bifold.pdf	
Route 8B Bifold.pdf	
Route 9 Bifold.pdf	
Route 10 Bifold.pdf	
Route 11 Bifold.pdf	
Route 12A Bifold.pdf	
Route 12B Bifold.pdf	
Route 13 Bifold.pdf	
Route 14 Bifold.pdf	
Route 15 Bifold.pdf	
Route 16 Bifold.pdf	
Route 17 Bifold.pdf	

File Name	Revision Date
Route 18 Bifold.pdf	
Route 19 Bifold.pdf	
Route 20 Bifold.pdf	
Route C1 Bifold.pdf	
Route C2 Bifold.pdf	
Route C3 Bifold.pdf	
Safety Inspections Audits.pdf	
SAFETY MANAGEMENT POLICY.docx	3/17/2020
SPAC Meetings.pdf	
SPAC MEMBERSHIP 7 29 2022 (3).docx	7/29/2022
TAPTCO Training.pdf	
LTMI Workers' Compensation Policy and Procedure 7.9.2020	
DEMAND_RESPONSE_MITIGATION_MONITORING_FORMS_7 2020.xlsx	
FIXED_ROUTE_MITIGATION_MONITORING_FORMS_7 2020.xlsx	
TRANSIT_CENTER_MITIGATION_MONITORING_FORMS_7 2020.xlsx	
MAINTENANCE_DEPARTMENT_MITIGATION_MONITORING_FORMS_7 2020.xlsx	
LTMI_MITIGATION_FOLLOW_UP_FORM 8.2020.pdf	
Laredo El Matriptase 7 20 2020.docx	
LTMI Vehicle Anti-Idling Policy 10.15.2021.pdf	
LTMI Cart, Stroller and Cargo Policy 10.15.2021.pdf	
LTMI COVID-19 Vaccination Policy 12.24.2021.pdf	
LTMI COVID-19 Vaccination Policy 11.15.2021.pdf	

## **A. Glossary of Terms**

**Accident:** means an event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of transit vehicles; an evacuation for life safety reasons; at any location, at any time, whatever the cause.

**Accountable Executive (typically the highest executive in the agency):** means a single, identifiable person who has ultimate responsibility for carrying out the SMS of a public transportation agency, and control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan in accordance with 49 U.S.C. 5326.

**Agency Leadership and Executive Management:** means those members of agency leadership or executive management (other than an Accountable Executive, CSO, or SMS Executive) who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.

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

**Corrective Maintenance:** Specific, unscheduled maintenance typically performed to identify, isolate, and rectify a condition or fault so that the failed asset or asset component can be restored to a safe operational condition within the tolerances or limits established for in-service operations.

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

**Event:** means an accident, incident, or occurrence.

**Federal Transit Administration (FTA):** means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

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

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

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

**Key staff:** means a group of staff or committees to support the Accountable Executive, CSO, or SMS Executive in developing, implementing, and operating the agency's SMS.

**Major Mechanical Failures:** means failures caused by vehicle malfunctions or subpar vehicle condition which requires that the vehicle be pulled from revenue.

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

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

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

**Passenger:** means a person, other than an operator, who is on board, boarding, or alighting from a vehicle on a public transportation system for the purpose of travel.

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

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

**Preventative Maintenance:** means regular, scheduled, and/or recurring maintenance of assets (equipment and facilities) as required by manufacturer or vendor requirements, typically for the purpose of maintaining assets in satisfactory operating condition. Preventative maintenance is conducted by providing for systematic inspection, detection, and correction of anticipated failures either before they occur or before they develop into major defects. Preventative maintenance is maintenance, including tests, measurements, adjustments, and parts replacement, performed specifically to prevent faults from occurring. The primary goal of preventative maintenance is to avoid or mitigate the consequences of failure of equipment.

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

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

**Risk Mitigation:** means a method or methods to eliminate or reduce the effects of hazards.

**Road Calls:** means specific, unscheduled maintenance requiring either the emergency repair or service of a piece of equipment in the field or the towing of the unit to the garage or shop.

**Safety Assurance (SA):** means the process within a transit agency's SMS that functions to ensure the implementation and effectiveness of safety risk mitigation and ensures that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

**Safety Management Policy (SMP):** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of the agency's employees regarding safety.

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

**Safety Management System (SMS) Executive:** means a CSO or an equivalent.

**Safety Objective:** means a general goal or desired outcome related to safety.

**Safety Performance:** means an organization's safety effectiveness and efficiency, as defined by safety performance indicators and targets, measured against the organization's safety objectives.

**Safety Performance Indicator:** means a data-driven, quantifiable parameter used for monitoring and assessing safety performance.

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

**Safety Performance Monitoring:** means activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.

**Safety Performance Target (SPT):** means a quantifiable level of performance or condition, expressed as a value for a given performance measure, achieved over a specified timeframe related to safety management activities.

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

**Safety Risk:** means the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome.

**Safety Risk Assessment:** means the formal activity whereby a transit agency determines SRM priorities by establishing the significance or value of its safety risks.

**Safety Risk Management (SRM):** means a process within a transit agency's Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risk.

**Safety Risk Mitigation:** means the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards.

**Safety Risk Probability:** means the likelihood that a consequence might occur, taking as reference the worst foreseeable, but credible, condition.

**Safety Risk Severity:** means the anticipated effects of a consequence, should the consequence materialize, taking as reference the worst foreseeable, but credible, condition.

**Serious Injury:** means any injury which:

- Requires hospitalization for more than 48 hours, commencing within seven days from the date that the injury was received;
- Results in a fracture of any bone (except simple fractures of fingers, toes, or nose);
- Causes severe hemorrhages, nerve, muscle, or tendon damage;
- Involves any internal organ; or
- Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

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

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

**State of Good Repair:** means the condition in which a capital asset is able to operate at a full level of performance.

**State Safety Oversight Agency:** means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.

**Transit Agency:** means an operator of a public transportation system.

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

**Vehicle Revenue Miles (VRM):** means the miles that vehicles are scheduled to or actually travel while in revenue service. Vehicle revenue miles include layover/recovery time and exclude deadhead; operator training; vehicle maintenance testing; and school bus and charter services.

## ***B. Additional Acronyms Used***

**ASP:** Agency Safety Plan

**El Metro:** Laredo Transit Management, Inc./El Metro Transit, City of Laredo, Texas

**ESRP:** Employee Safety Reporting Program

**FAST Act:** Fixing America's Surface Transportation Act

**LTMI:** Laredo Transit Management, Inc.

**MAP-21:** Moving Ahead for Progress in the 21<sup>st</sup> Century Act

**MOU:** Memorandum of Understanding

**MPO:** Metropolitan Planning Organization

**NTD:** National Transit Database

**OSHA:** Occupational Safety and Health Administration

**SOP:** Standard Operating Procedure

**SPAC:** Safety Planning Advisory Committee

**TxDOT:** Texas Department of Transportation

**FTA:** Federal Transit Administration

**NSP:** National Public Transportation Safety Plan





**8. APPENDIX B**

*A. City Council/Board Minutes or Resolution*



## B. Record of Changes

The following table, Table 3, will be used to record final changes made to the ASP during the annual update. This table will be a permanent record of the changes to the ASP over time.

**TABLE 9: ASP RECORD OF CHANGES**

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Version 1	Whole Document	Initial Version	Adrian Chavera	April 14, 2020
Version 2	Cover Page	Changed color Header and footer	Adrian Chavera	February 5, 2021
Version 2	Table of Contents/Page 2	Updated Page Numbers	Adrian Chavera	February 5, 2021
Version 2	List of Figures /Page 3	Replaced “Matrix” with “Matrices” and also added “Safety Risk Acceptance Actions” also Updated Page Numbers.	Adrian Chavera	February 5, 2021
Version 2	List of Tables/ Page 3	Added table 5 and moved record of changes to the end due to the long changes. I also updated the page numbers.	Adrian Chavera	February 5, 2021
Version 2	Executive Summary/ Page 4	Changed management to Leadership.	Adrian Chavera	February 5, 2021
Version 2	Executive Summary/ Page 4	Capitalized administration and operations.	Adrian Chavera	February 5, 2021
Version 2	Section 1. Executive Summary/ Page 4	“the Texas Department of Transportation (TxDOT) has developed the initial Agency Safety Plan (ASP) in collaboration with Laredo Transit Management, Inc. and the Laredo Transit Management, Inc. has updated the initial Agency Safety Plan to develop the second version of the Public Transportation Agency Safety Plan in collaboration with the City of Laredo and the Laredo Mass Transit Board with fiduciary responsibility for (LTMI)”.	Adrian Chavera	February 5, 2021
Version 2	Section B/Page 5	Added this section “In addition, El Metro will certify compliance with the PTASP regulation through FTA’s Transit Award Management System (TrAMS) and the annual Certifications and Assurances process.”	Adrian Chavera	February 5, 2021
Version 2	Section 1/Page 6	Changed “two” to “three”	Adrian Chavera	February 5, 2021
Version 2	Table 1. Agency Information/Page 7	Changed color scheme for all tables to match our brand.	Adrian Chavera	February 5, 2021
Version 2	Table 1. Agency Information, page 7	Added Monica Garcia, AGM of Administration/PIO	Adrian Chavera	February 5, 2021

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Version 2	Table 1. Agency Information/Page 7	Added Arturo Trevino as a Key Staff member for safety.	Adrian Chavera	February 5, 2021
Version 2	Figure 1/Page 8	Added revised LTMI Organizational Chart.	Adrian Chavera	February 5, 2021
Version 2	Section 3. Part A. Page 10	Signature line has been added for the Safety Management Policy Statement.	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting Program/ Page 11	Changed from “an” to “the” and added “LTMI”.	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting Program/Page 11	Changed “the” to “their” and capitalized Supervisors.	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting Program/Page 11	Changed “head” to “leadership”	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting Program/Page 11	Added the “LTMI Employee Safety Hazard Reporting Form (Appendix A)”.	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting Program/Page 11	Removed “Over the next year” and added “During the annual review”.	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting Program, last paragraph/Page 11	Removed “In order to implement “and put “LTMI Employee Safety Reporting Program Implementation”	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting Program/ Page 11	Removed “The procedures will also be provided to the union” and put “The LTMI Employee Safety Reporting Program was forwarded, via certified mail, to the Union”	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting Program/Page 11	Removed “The procedures will also be provided to the union” and added “On march 23, 2020, El Metro forwarded the LTMI Employee Safety Reporting Program and memo, via certified mail, to the Union”	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting program/Page 12	Removed “will also spell out” and put “also includes”	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting program, 1 <sup>st</sup> paragraph, 3 <sup>rd</sup> sentence/Page 12	Added afforded “to” employees	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting program, 1 <sup>st</sup> paragraph, 3 <sup>rd</sup> sentence/Page 12	Removed “will” and added an “s” to the word “describe”.	Adrian Chavera	February 5, 2021
Version 2	Section I. Employee Safety Reporting program, 1 <sup>st</sup> Paragraph/ Page 12	Removed “will” and added an “s” to the word “elaborate”.	Adrian Chavera	February 5, 2021

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Version 2	Section I. Employee Safety Reporting program, 2 <sup>nd</sup> Paragraph/ Page 12	Removed “also” and put “continue to”.	Adrian Chavera	February 5, 2021
Version 2	Section II. Communicating the Policy Throughout the Agency, 1 <sup>st</sup> paragraph/ Page 12	Added “LTMI initiated the communication on August 4, 2020 to all Executive Leadership, Administration, All Department Leadership and Route Supervisors”	Adrian Chavera	February 5, 2021
Version 2	Section II. Communicating the Policy Throughout the Agency, Page 13	Added Email and WebEx webinar to possible methods of communicating.	Adrian Chavera	February 5, 2021
Version 2	Section B., Page 13	Removed “Laredo Urban Transportation Study” and put “Laredo & Webb county Area Metropolitan Planning Organization”.	Adrian Chavera	February 5, 2021
Version 2	Section B/Page 13	Removed “conducts a yearly” and added “conducted a”	Adrian Chavera	February 5, 2021
Version 2	Section B/ Page 14	Added date “October 28, 2019” for documentation purposes.	Adrian Chavera	February 5, 2021
Version 2	Section C/Page 15	Revised timeline and deadlines.	Adrian Chavera	February 5, 2021
Version 2	Section C/Page 15	New location of the Record of changes.	Adrian Chavera	February 5, 2021
Version 2	Section F/Page 16	Changed Table Numbers because I moved the ASP Record of Changes to the end. So, they start at 3 and end at 9. All pages were updated as well in the list of tables.	Adrian Chavera	February 5, 2021
Version 2	Table 4/Page 16	Updated Baseline data for 2020	Adrian Chavera	February 5, 2021
Version 2	Table 5/Page 17	Added 5-year Safety Performance Data so, people can see where I get the baseline.	Adrian Chavera	February 5, 2021
Version 2	Section F/Page 18	Updated the statement on setting Safety Performance Targets.	Adrian Chavera	February 5, 2021
Version 2	Table 6., Page 18	Updated data for 2020 baseline and 2021 targets.	Adrian Chavera	February 5, 2021
Version 2	Table 6/Page 18	Updated data for 2020 baseline and 2021 targets.	Adrian Chavera	February 5, 2021
Version 2	Section G/Page 19.	Removed “Laredo Urban Transportation Study and added “Laredo & Webb county Area Metropolitan Planning Organization”.	Adrian Chavera	February 5, 2021
Version 2	Section A. Safety Risk Management, Section B. Safety Assurance and Section C. Safety Promotion/ Page 21 to 43	Revised all Processes.	Adrian Chavera	February 5, 2021
Version 2	Figure 4/Page 22	Updated	Adrian Chavera	February 5, 2021

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Version 2	Section I. Safety Hazard Identification/Page 24	Hazard Investigation forms inserted.	Adrian Chavera	February 5, 2021
Version 2	Figure 5/Page 28	Updated	Adrian Chavera	February 5, 2021
Version 2	Figure 6 and 7/Page 29,30 and 31	Updated	Adrian Chavera	February 5, 2021
Version 2	Table 8 PTASP Supporting Documents/Page 45	Added Cyber Security Training and Certification 8.14.2020,	Adrian Chavera	February 5, 2021
Version 2	Table 8. PTASP Supporting Documents, Page 48	Added LTMI Workers' Compensation Policy and Procedure 7.9.2020.	Adrian Chavera	February 5, 2021
Version 2	Table 8. PTASP Supporting Documents, Page 48	Added Demand Response Mitigation Monitoring Forms 7.2020.	Adrian Chavera	February 5, 2021
Version 2	Table 8. PTASP Supporting Documents, Page 48	Added fixed Route Mitigation Monitoring Forms 7.2020.	Adrian Chavera	February 5, 2021
Version 2	Table 8. PTASP Supporting Documents, Page 48	Added Transit Center Mitigation Monitoring Forms 7.2020.	Adrian Chavera	February 5, 2021
Version 2	Table 8. PTASP Supporting Documents, Page 48	Added Maintenance Department Mitigation Monitoring Forms 7.2020.	Adrian Chavera	February 5, 2021
Version 2	Table 8. PTASP Supporting Documents, Page 48	Added - LTMI Mitigation Follow-up form, 7.2020.	Adrian Chavera	February 5, 2021
Version 2	Table 8. PTASP Supporting documents, Page 48	Added Laredo El Metro PTASP 7 20 2020 document.	Adrian Chavera	February 5, 2021
Document Version	Section/Pages Changed	Reason for change	Reviewer Name	Date of Change
Version 3	Title Page, Page 1	Updated Version 2 to Version 3	Sergio Gomez	February 22, 2022
Version 3	Title Page, Page 1	Added Mass Transit Board Approved Plan date 03-21-2022	Sergio Gomez	February 22, 2022
Version 3	Section 1. Executive Summary, Page 4	Fourth paragraph, removed the word second, and added third.	Sergio Gomez	February 22, 2022
Version 3	Section 1. Part A. Plan Adoption, Page 5	Removed, General Manager, Claudia San Miguel; Added New General Manager, Robert J. Garza.	Sergio Gomez	February 22, 2022
Version 3	Section 1. Part A. Plan Adoption, Page 5	Approval date and Resolution No. Updated	Sergio Gomez	February 22, 2022
Version 3	Section 1. Part B. Certification of Compliance, Page 5	Date of Certification updated	Sergio Gomez	February 22, 2022
Version 3	Section 2. Transit Agency Information, Page 6	Changed "First Transit" to HTG (Hendrickson Transportation Group)	Sergio Gomez	February 22, 2022
Version 3	Section 2. Transit Agency Information, Page 6	Second paragraph, Re-worded last sentence, "The El Metro main office/transfer center is located at 1301 Farragut St., Laredo, TX78040" to.	Sergio Gomez	February 22, 2022

Document Version	Section/Pages Changed	Reason for change	Reviewer Name	Date of Change
Version 3	Section 2. Transit Agency Information, Page 6	Cont. "The El Metro main office is located at Transit Center, 1301 Farragut 3 <sup>rd</sup> Floor, Laredo, TX 78040".	Sergio Gomez	February 22, 2022
Version 3	Section 2. Transit Agency Information, Page 6	Second to last paragraph, Changed "First Transit" to "HTG".	Sergio Gomez	February 22, 2022
Version 3	Section 2. Agency Information, Page 6	Changed "Assistant General Manager of Maintenance and Facilities" to "Assistant General Manager of Operations and Maintenance"	Sergio Gomez	February 22, 2022
Version 3	Section 2. Transit Agency Information Page 6	Removed "Mobility Manager	Sergio Gomez	February 22, 2022
Version 3	Section 2. Table 1. Agency Information, Page 7	Changed Accountable Executive "Claudia San Miguel" To "Robert J. Garza"	Sergio Gomez	February 22,2022
Version 3	Section 2. Table 1. Agency Information, Page 7	Changed "Adrian Chavera" to "Sergio Gomez"	Sergio Gomez	February 22,2022
Version 3	Section 2. Table 1. Agency Information, Page 7	Update Key staff title "AGM of Operation and Facilities" to "AGM of Operation and Maintenance "	Sergio Gomez	February 22, 2022
Version 3	Section 2. Figure 1. El Metro Organizational Chart, Page 8	Revised Organizational Chart	Sergio Gomez	February 22, 2022
Version 3	Section 3. Safety Policies and Procedures, Page 10	Changed El Metro General Manager "Claudia San Miguel" To "Robert J. Garza"	Sergio Gomez	February 22, 2022
Version 3	Section 3. Table 2. ASP Annual Timeline, Page 14 -15	Updated	Sergio Gomez	February 22, 2022
Version 3	Section 3. Table 4. Baseline Safety Performance Measures, Page 16	Updated Baseline year on table 4. "2020" to "2021"	Sergio Gomez	February 22, 2022
Version 3	Section 3. Table 5. Safety Performance Measures, Page 17	Updated 5 Year Safety Performance Table for El Metro by Mode of Service Chart	Sergio Gomez	February 22. 2022
Version 3	Section 3. Table 6. Safety Performance Measures, Page 18	Updated Safety Performance Targets for Fix Routes	Sergio Gomez	February 22, 2022
Version 3	Section 3. Table 7. Safety Performance Measures, Page 18	Updated Safety Performance Targets for On Demand Response	Sergio Gomez	February 22, 2022
Document Version	Section/Pages Changed	Reason for change	Reviewer Name	Date of Change
Version 4	Title Page, Page 1	Updated Version 3 to Version 4	Sergio Gomez	Dec 30, 2022
Version 4	Title Page, Page 1	Updated adoption date	Sergio Gomez	Dec 30, 2022
Version 4	Section 1 Executive Summary, Page 4	Fourth paragraph, change the word Third to Fourth	Sergio Gomez	Dec 30, 2022

Document Version	Section/Pages Changed	Reason for change	Reviewer Name	Date of Change
Version 4	Section 1 Part A. Plan Adoption, Page 5	Accountable Executive signature and Date, Updated	Sergio Gomez	Feb 02, 2023
Version 4	Section 1 Part A Plan Adoption, Page 5	City Council/Mass Transit Board Approval Date and Resolution No., updated	Sergio Gomez	Feb 02, 2023
Version 4	Section 1., Part B. Certification of Compliance, Page 5	Certification of Compliance Date: Updated	Sergio Gomez	Feb 02, 2023
Version 4	Section 2 Transit Agency Information, 1st paragraph, Page 6	Changed "HTG" to Hendrickson Transportation Group, Inc	Sergio Gomez	Feb 02, 2023
Version 4	Section 2 Transit Agency Information, 2nd paragraph, Page 6	Added "ST." to 1301 Farragut	Sergio Gomez	Feb 02, 2023
Version 4	Section 2 Transit Agency Information, 4 <sup>th</sup> paragraph, Page 6	Updated Management Team Members	Sergio Gomez	Feb 02, 2023
Version 4	Section 2. Table 1, Agency Information, Page 7	Removed 5311 as an FTA Funding Type	Sergio Gomez	Feb 02, 2023
Version 4	Section 2, Figure 1. El Metro Organizational Chart, Page 8	Updated Organizational Chart	Sergio Gomez	Feb 02, 2023
Version 4	Section 2. Part A. Authorities and Responsibilities, Page 9	Removed "over the next year" also, replaced Payroll and Benefits Coordinator with Human Resources	Sergio Gomez	Feb 02, 2023
Version 4	Section 3. Safety Policies and Procedures, Part A. Page 10	Added new approval signature and date of effectiveness	Sergio Gomez	Feb 02, 2023
Version 4	Section 3. Part 1 Employee Safety Reporting Program, Page 11	Added "ESRP" abbreviation to the end of Employee Safety Reporting Program	Sergio Gomez	Feb 02, 2023
Version 4	Section 3 Part II. Communicating the Policy Throughout the Agency last Paragraph, Page 13	Added "SPAC" abbreviation to the term Safety Planning Advisory Committee.	Sergio Gomez	Feb 02, 2023
Version 4	Section 3 Part C. PTASP Annual Review, Table 2. ASP Timeline, Page 14	Added: SPAC will approve ASP and any updates	Sergio Gomez	Dec 30, 2022
Version 4	Section 3 Part D. Safety Committee Pg.14	FTA: New Requirement Safety Committee (SPAC)	Sergio Gomez	Dec 30, 2022
Version 4	Section 3 Part C., Annual Review timeline last Paragraph page 15	Added; February 1 to March 5, (SPAC) approve ASP and updates	Sergio Gomez	Dec 30, 2022



Document Version	Section/Pages Changed	Reason for change	Reviewer Name	Date of Change
Version 4	Section 3 Part F. Safety Performance Targets, Page 16 Table 4.	Update Baseline year on Table 4. "2022" to "2023"	Sergio Gomez	Feb 02, 2023
Version 4	Section 3. Table 6. Safety Performance Measures, Page 18	Updated Safety Performance Targets for Fix Route	Sergio Gomez	Feb 02, 2023
Version 4	Section 5 Risk Reduction Program Pg. 43	FTA: New Requirement Safety Risk Reduction Program: Vehicular and Pedestrian Accidents	Sergio Gomez	March 20, 2023
Version 4	Section 5 Risk Reduction Program Pg. 43	FTA: New Requirement Safety Risk Reduction Program: Assault on Transit Workers	Sergio Gomez	March 20, 2023
Version 4	Section 5 Risk Reduction Program Pg. 43	FTA: New Requirement Safety Risk Reduction Performance Targets	Sergio Gomez	March 20, 2023
Version 4	Section 3. Table 7. Safety Performance Measures, Page 18	Updated Safety Performance Targets for Demand Response	Sergio Gomez	Feb 02, 2023
Version 4	Section 4-part 1 Safety Competency and Training Pg.41	FTA: New Requirement de-escalation training added.	Sergio Gomez	March 20, 2023
Version 4	Section 4 Part 5 Public Health Pg. 44	FTA: New Requirement Plan to minimize exposure to infectious disease	Sergio Gomez	March 20, 2023
Version 4	Section 7 Appendix A Table 8 Pg.44	Added Bifold. Pdf for C1, C2 and C3.	Sergio Gomez	Feb 02, 2023
Document Version	Section/Pages Changed	Reason for change	Reviewer Name	Date of Change
Version 5	Title Page, Pg. 1	Update from Version 4 to version 5. Adoption date, updated	Sergio Gomez	Jan 11, 2024
Version 5	Section 1. Part A. Plan Adoption Page 5	Update – Signature and date of compliance	Sergio Gomez	Jan 11, 2024
Version 5	Section 1. Plan Adoption Account Executive Signature Pg. 5	Changed - General Manager to Transit Director	Sergio Gomez	Jan. 11, 2024
Version 5	Section 1 Part A. Plan Adoption, Page 5	City Council/Mass Transit Board Approval Date and Resolution No., updated	Sergio Gomez	Jan 11, 2024
Version 5	Section 1 Part B. Certification of Compliance Pg. 5	Agency Safety Plan certification date updated.	Sergio Gomez	Jan 11, 2024
Version 5	Section 2. Transit Agency Information, Page 6	Changed – "General Manager" to "Transit Director" on paragraph 1 and last paragraph	Sergio Gomez	Jan 11, 2024
Version 5	Section 2. Transit Agency Information, Page 6	Changed – "Three" to "Two" Assistant General Managers	Sergio Gomez	Jan 11, 2024
Version 5	Section 2. Table 1: Agency Information Page 7	Changed - Title of Account Executive from General Manager to Transit Director	Sergio Gomez	Jan 11, 2004

Document Version	Section/Pages Changed	Reason for change	Reviewer Name	Date of Change
Version 5	Section 2. Table 1 Agency Information Pg. 7	Remove PIO title from AGM of Administration, Monica Garcia	Sergio Gomez	Jan 11, 2024
Version 5	Section 2. Figure1: El Metro Organizational Chart, Pg. 8	Updated Organizational Chart, Signature and date of certification	Sergio Gomez	Jan 11, 2024
Version 5	Section 3. Safety Policies and Procedures Part A. Pg. 10	Changed – “El Metro General Manager” to “Transit Director” Update – date of certification	Sergio Gomez	Jan 11, 2024
Version 5	Section 3. Part E. PTASP Maintenance Pg.15	Removed – “implementation status” for “any Federal transit Administration (FTA) General Directives”	Sergio Gomez	Jan 11, 2024
Version 5	Section 3. Part G. Table 3. NSP, Safety Performance Measures Page 16	Added – “As National Transportation Safety Plan updates so will SPT’s”	Sergio Gomez	Jan 11, 2024
Version 5	Section 3 Part G. Table 4. Baseline Page 16	Added - Baseline for 2024; LTMI Safety Performance Measures to title.	Sergio Gomez	Jan 11, 2024
Version 5	Section 3 Part G. Table 4. Baseline Page 16	Updated LTMI Safety Performance Measures.	Sergio Gomez	Jan 11, 2024
Version 5	Section 3. Part G. Table 5. 5-Year Safety Performance by Mode of Service. Page 17	Updated Safety Performance Targets for El Metro by Mode of Service. 5-Year rolling average	Sergio Gomez	Jan 11, 2024
Version 5	Section 3. Part G. Tables 6 & 7 Fixed/Demand response SPTs	Updated – Safety Performance Targets for Fixed route and Demand response	Sergio Gomez	Jan 11, 2024
Version 5	Section 3 Part G. Table 5.5 Calendar year 2023 SPTs	Updated – Calendar year 2023 Safety Performance Targets	Sergio Gomez	Jan 11, 2024
Version 5	Section 4. Part A. Safety Risk Management – 673.25 Page 20	Changed 1. to A. at beginning of Safety Risk Management – 673.25	Sergio Gomez	Jan 11, 2024
Version 5	Section 4. Part A. Table 4. Draft Risk Register. Page 22	Removed yellow highlighted section from last paragraph.	Sergio Gomez	Jan 11, 2024
Version 5	Section 4. Part B. Safety Assurance – 673.27 Page 33	Changed the number 2 for the letter B. at the beginning of Safety Assurance -673.27	Sergio Gomez	Jan 11, 2024
Version 5	Section 4. Part C. Safety Promotion – 673.27 Page 39	Changed the number 3 for the letter C at the beginning of Safety Promotion	Sergio Gomez	Jan 11, 2024
Version 5	Section 4. Item I. Safety Competencies and Training Page 41	Added “Summer” to seasonal safety hazards. Included training on Assaults Awareness and Prevention for Transit Operators/Workers	Sergio Gomez	Jan 11, 2024
Version 5	Section 5. Item 1. Vehicular and Pedestrian Accidents Page 43	Changed “is” to “will be” and removed “will reduce” added “will assist in reducing the likelihood of risk” Removed last sentence.	Sergio Gomez	Jan 11, 2024
Version 5	Section 5. Item III. Risk Reduction Performance Targets Page 44	Added – will add SPTs when published by NTD. Changed - paragraph to recipient may choose to adopt 3-year rolling average while addressing Part 673 requirements.	Sergio Gomez	Jan 11, 2024

Document Version	Section/Pages Changed	Reason for change	Reviewer Name	Date of Change
Version 5	Section 7. Appendix A. Table 8. Supporting Documents Page 44	Added revised Circulator 1 and 2 Bifold.pdf	Sergio Gomez	Jan 11, 2024
Version 5	Section 7. Part A. Glossary of Terms Page 50	Changed – “service” for “revenue” under Glossary Term “Major Mechanical Failures”	Sergio Gomez	Jan 11, 2024
Version 5	Section 7. Part B. Additional Acronyms Used Page 53	Added – FTA: Federal Transit Administration and NSP: National Public Transportation Safety Plan	Sergio Gomez	Jan 11, 2024
Version 5	Title Page, pg. 1	Updated Adoption date to 4-2-2024 and Resolution No. from: 2024-RT-RT-05 to 2024-RT-09.	Sergio Gomez	March 20, 2024
Version 5	Section 1. Executive Summery Part A. pg. 5	Corrected date of approval to April 02, 2024	Sergio Gomez	March 20, 2024
Version 5	Section 2. Transit Agency Information. Pg. 6	Changed Assistant General Manager of Operations and Maintenance to Assistant General manager of Operations.	Sergio Gomez	March 20, 2024
Version 5	Section 2. Transit Agency Information. Table 1. Pg. 7	Changed Rosa Soto, AGM of Operations and Maintenance to Rosa Soto, AGM of Operations.	Sergio Gomez	March 20,2024

