



Public Transportation Agency Safety Plan

Clean Air Express
260 N. San Antonio Road
Santa Barbara, California 93110

Adopted
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Signature of Accountable Executive
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SBCAG Executive Director

Date

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Definitions

Accident means an Event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; an evacuation for life safety reasons.

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

Agency or Transit Agency (also referred to as Clean Air Express) means the Clean Air Express which is funded, managed, and administered by the Santa Barbara County Association of Governments (SBCAG). SBCAG contracts the operation of its Clean Air Express transit service to AmericanStar Inc.

SBCAG Board or Equivalent Authority means the SBCAG Board of Directors which is the governing body of Clean Air Express.

Caltrans means the California Department of Transportation

Chief Safety Officer means the adequately trained individual who has responsibility for safety and reports directly to the Transit Agency's chief executive officer.

CFR means Code of Federal Regulations.

Event means any Accident, Incident, or Occurrence.

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 the 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 the Transit Agency.

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

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

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

Part 673 means 49 CFR (Code of Federal Regulations) Part 673.

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

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

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

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

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

Safety Assurance means processes within the Transit Agency's Safety Management Systems that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the Transit Agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

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

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

Safety Performance Target (SPT) means a Performance Target related to safety management activities.

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

Safety Risk Assessment (SRA) means the formal activity whereby the Transit Agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management (SRM) means a process within the Transit Agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious injury means any injury which: (1) requires hospitalization for more than 48 hours, commencing within seven days from the date the injury was received, (2) results in a fracture of any bone (except simple fractures of fingers, toes, or noses), (3) causes severe hemorrhages,

nerve, muscle, or tendon damage; (4) involves any internal organ, or (5) involves second or third-degree burns, or any burns affecting more than five 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 of Good Repair (SGR) means the condition in which a capital asset is able to operate at a full level of performance.

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

U.S.C. means United States Code.

Terms used and not otherwise defined herein shall have the meaning given in Part 673, if available, or should otherwise be construed to harmonize the requirements of Part 673.

Commonly Used Acronyms

SBCAG	Santa Barbara County Association of Governments
CFR	Code of Federal Regulations
FTA	Federal Transit Administration
PTASP	Public Transportation Agency Safety Plan
SMS	Safety Management System
SPT	Safety Performance Targets
SRA	Safety Risk Assessment
SRM	Safety Risk Management
SGR	State of Good Repair
U.S.C.	United States Code

Section 1 Transit Agency Information

Clean Air Express is funded and operated by the Santa Barbara County Association of Governments, an MPO formed in 1966 with authorization to operate transit service formed by a Joint Powers Agreement for Santa Barbara County and Cities Area Planning Council which operates fixed route service in Santa Barbara County, California. The Clean Air Express does purchase transportation services from AmericanStar Inc. Clean Air Express is currently not a

direct recipient of 49 U.S.C. Section 5307 funds (“Section 5307”), but is applying to be a recipient beginning in Federal Fiscal Year (FFY) 2021. The Clean Air Express is a Section 5307 subrecipient through the City of Santa Maria. Clean Air Express does not provide transportation services on behalf of another entity.

Subsection 1.1 Accountable Executive

Clean Air Express’ Accountable Executive is SBCAG Executive Director, Marjie Kirn as of October 2020. The SBCAG Executive Director is the single, identifiable person who has ultimate responsibility for carrying out this Agency Safety Plan and the Clean Air Express’ Transit Asset Management (TAM) Plan, and control or direction over the human and capital resources needed to develop and maintain both this Agency Safety Plan and the TAM Plan.

The SBCAG Executive Director is accountable for ensuring that the Agency’s Safety Management Systems (SMS) is effectively implemented throughout the Agency’s public transportation system. The SBCAG Executive Director is accountable for ensuring action is taken, as necessary, to address substandard performance in the Agency’s SMS. The SBCAG Executive Director may delegate specific responsibilities, but the ultimate accountability for the Transit Agency’s safety performance cannot be delegated and always rests with the SBCAG Executive Director.

Subsection 1.2 Chief Safety Officer

The SBCAG Executive Director designates the AmericanStar Transport Operations Director, Bob Dockerty as of October 2020, as Clean Air Express’ Chief Safety Officer who has the authority and responsibility for day-to-day implementation and operation of the Agency’s SMS. The Chief Safety Officer holds a direct line of reporting to the Accountable Executive, and has a strong working relationship with the operations and asset management functions at Clean Air Express.

Section 2 Agency Safety Plan Development, Approval, and Updates

Caltrans developed the contents of Clean Air Express’ Agency Safety Plan to meet requirements specified in Part 673 and comply with section 673.11(d) regarding Caltrans’ responsibility to develop an ASP for any small public transportation provider that is located in California. This Agency Safety Plan is based on the four (4) principles or pillars of the Safety Management Systems (SMS). SMS is defined as the formal, top-down, organization-wide, data-driven approach to managing safety risk and assuring the effectiveness of safety mitigations. It includes systematic policies, procedures, and practices for the management of safety risk. The four principles or pillars of SMS are: (1) Safety Management Policy; (2) Safety Risk Management; (3) Safety Assurance; and (4) Safety Promotion. (49 CFR § 673.21.)

Subsection 2.1 Drafting the Agency Safety Plan

Caltrans drafted this Agency Safety Plan, thus meeting the requirements of 49 CFR section 673.11(d). FTA will oversee compliance with the requirements of Part 673 through the existing Triennial Review processes.

Should Clean Air Express no longer meet the definition of a small public transportation provider or choose to opt-out of the Caltrans Agency Safety Plan, within one year from the date of notifying the State of either development Clean Air Express will draft and certify its own Agency Safety Plan. If the Clean Air Express operates more than 100 vehicles Clean Air Express must fulfil requirements of systems operating more than 100 vehicles.

Subsection 2.2 Signature by the Accountable Executive and Approval by the Board

Pursuant to 49 CFR Part 673.11 (a)(1), this PTASP and subsequent updates must be signed by the Accountable Executive and approved by SBCAG Board. Documentation of Board approval is found in Attachment 1.

Subsection 2.3 Certification of Compliance

Pursuant to 49 CFR sections 673.13(a) and 673.13(b), SBCAG self-certifies that it has established this Agency Safety Plan, meeting the requirements of 49 CFR Part 673 by December 31, 2020 and will certify its compliance with 49 CFR Part 673.

On an annual basis Clean Air Express must update this Agency Safety Plan by July 20 in perpetuity, unless otherwise directed or authorized. All Agency Safety Plan updates shall be signed by the Accountable Executive and approved by SBCAG Board. Subsection 2.4 Agency Safety Plan Review and Updates

Clean Air Express updates this Agency Safety Plan when information, processes or activities change within the Agency and/or when Part 673 undergoes significant changes, or annually, whichever comes sooner. As Clean Air Express collects data through its Safety Risk Management and Safety Assurance processes, shared with Caltrans and the local Metropolitan Planning Organization (MPO) as described in subsection 3.1 below, the MPO and Caltrans will evaluate Clean Air Express' safety performance targets (SPTs) to determine whether they need to be changed, as well.

This Agency Safety Plan will be jointly reviewed and updated by the Chief Safety Officer and the SBCAG Director of Rail and Transit, with the assistance of subject matter experts, annually in July. The Accountable Executive will approve any changes, then present the revised Agency Safety Plan to the SBCAG Board for approval.

This Agency Safety Plan may need to be reviewed and updated more frequently based on the following:

- A determination that the approach to mitigating safety deficiencies is ineffective;
- Significant changes are made to service delivery;
- The introduction of new processes or procedures that may impact safety;
- A change or re-prioritize in resources available to support SMS;
- A significant change to the organizational structure; or
- Updates to the legal requirements under Part 673.

Section 3 Safety Performance Targets (SPTs)

Subsection 3.1 Target Development

Clean Air Express includes SPTs in this Safety Plan. These SPTs are specific numerical targets set by Clean Air Express and based on the safety performance measures established by FTA in the National Public Transportation Safety Plan. In the most recent version, the 2017 NSP3, FTA adopted four initial safety performance measures: (1) fatalities, (2) injuries, (3) safety events, and (4) system reliability.

Clean Air Express developed SPTs that it will review and update annually. The specific SPTs are based on the safety performance measures established under the National Public Transportation Safety Plan and the safety performance goals set by Caltrans based on the past three (3) Calendar years of data. The Safety Performance Targets for Clean Air Express for the year 2021 are expected to stay within 1% +/- of previous three years data pertaining to fatalities, injuries, safety events, and system reliability.

FTA requires Caltrans to coordinate with Clean Air Express and the MPO to the maximum extent practicable. Pursuant to 49 CFR section 673.15(a), Clean Air Express will make safety performance targets available to the MPO to aid in the planning process upon certification of this Agency Safety Plan. Additionally, the Clean Air Express will transmit performance data against the safety performance targets to Caltrans and the MPO on an annual basis.

Caltrans will conduct coordination meetings with the Santa Barbara County Association of Governments for the selection of State and MPO safety performance targets and goals.

Safety Performance Targets							
Safety Performance Targets (SPTs) are specific numerical targets set by the Clean Air Express based on safety performance measures under the National Public Transportation Safety Plan for: (1) fatalities, (2) injuries, (3) safety events, and (4) system reliability (State of Good Repair). Rates for the safety performance targets are calculated by Clean Air Express management with their contractor AmericanStar Inc. per 100,000 vehicle revenue miles (VRM) based on a three-year average from 2017-2020.							
Mode of Transit	Fatalities (Total)	Fatalities Rate (per 100k VRM)	Injuries (Total)	Injuries Rate (per 100k VRM)	Safety Events (Total)	Safety Events Rate (per 100k VRM)	System Reliability (Mean Distance between Major Mechanical Failures)
Inter-City Bus	0	0%	0	0%	2	.192	60,000

Section 4 Overview of the Agency's Safety Management Systems (SMS)

SMS is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry's existing safety foundation to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully. Clean Air Express' SMS focuses on applying resources to risk and is based on ensuring that the Clean Air Express has the organizational infrastructure to support decision-making at all levels regarding the assignment of resources. Some key parts of Clean Air Express' SMS include:

- Defined roles and responsibilities;
- Strong executive safety leadership;
- Formal safety accountabilities and communication;
- Effective policies and procedures; and
- Active employee involvement

Furthermore, Clean Air Express' SMS has four distinct components as required under 49 CFR section 673.21, which are discussed in subsequent sections to this Agency Safety Plan:

- Safety Management Policy;
- Safety Risk Management;
- Safety Assurance; and
- Safety Promotion.

Section 5 Safety Management Policy

The first component of the Clean Air Express' SMS is the Safety Management Policy), which is the foundation of the Clean Air Express' Safety Management System. It clearly states the Clean Air Express' safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. The Safety Management Policy clearly defines management and employee responsibilities for safety throughout the organization. It also ensures that management is actively engaged in the oversight of the system's safety performance by requiring regular review of the Safety Management Policy, budget, and program by the designated Accountable Executive.

Subsection 5.1 Safety Management Policy Statement

Safety is a core value at Clean Air Express, and managing safety is a core business function. Clean Air Express will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. Clean Air Express' overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent to eliminate unacceptable safety risk in our transit operations.

Clean Air Express will:

- Clearly, and continuously explain to all staff that everyone working within Clean Air Express must take part and be responsible and accountable for the development and operation of the Safety Management System (SMS).
- Work continuously to minimize safety risks. Work to comply with and, wherever possible, exceed legislative and regulatory requirements and standards for passengers and employees.
- Work to ensure that all employees are provided appropriate safety information and training, are competent in safety matters, and assigned tasks commensurate with duties and skills.
- Reaffirm that responsibility for making our operations safer for everyone lies with all employees – from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held

accountable to ensure that all reasonable steps are taken to perform activities established through the SMS.

Caltrans established safety performance targets to help measure the overall effectiveness of our processes and ensure we meet our safety objectives. Clean Air Express will keep employees informed about safety performance goals and objectives to ensure continuous safety improvement.

Subsection 5.2 Safety Management Policy Communication

The Safety Management Policy is communicated throughout the Agency, to all employees, managers, and executives, as well as contractors, and to the SBCAG Board.

This is accomplished through various processes such as:

- Workshops/training sessions – Conducted for Senior Management, Directors, Managers, Supervisors. Once this Agency Safety Plan, or any update to this Agency Safety Plan, has been signed by the Accountable Executive and approved by the Board of Directors, and certified by Caltrans, if required, it will become standard practice so that SMS becomes a standard business practice. All Union representatives will be kept informed.
- New Hire Safety Orientation – All new employees regardless of their classifications will be trained about their roles and responsibilities pertaining to PTASP and the principles of SMS.
- Safety bulletins, email safety newsletter blasts to staff, toolbox/tailgate safety meetings and/or safety committee meetings

Subsection 5.3 Employee Safety Reporting Program

The Clean Air Express implemented a process that allows employees [and contracted employees] to report safety conditions to senior management, protections for employees who report safety conditions to senior management. The purpose, description, and protections for employees to report unsafe conditions and hazards are described in the Employee Safety Reporting Program as below:

Purpose:

- a) To establish a system for Clean Air Express employees to identify unsafe conditions or hazards at work and report them to their department management without fear of reprisal. However, disciplinary action could result if the condition reported reveals the employee willfully participated in or conducted an illegal act, gross negligence or deliberate or willful disregard of regulations or procedures, including reporting to work under the influence of controlled substances, physical assault of a coworker or passenger, theft of agency property, unreported safety events, unreported collisions, and unreported passenger injuries or fatalities.
- b) To provide guidelines for facilitating the timely correction of unsafe conditions or hazards by Clean Air Express management.

Description:

a) This program provides a method for Clean Air Express management to identify, evaluate, and correct or avoid unsafe conditions or hazards, procedural deficiencies, design inadequacies, equipment failures, or near misses that adversely affect the safety of employees.

Examples of voluntary safety reports include but are not limited to:

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

b) The program also involves recommending corrective actions and resolutions of identified unsafe conditions or hazards and/or near miss.

c) All employees have the obligation to report immediately any unsafe conditions or hazards and near miss to their immediate supervisor/department manager and may do so without fear of reprisal.

d) Unsafe conditions or hazards may also be identified as a result of occupational injury or illness investigations and/or by accident investigation.

e) Other means by which hazards may be identified are inspections/audits or observations made by the supervisors/management staff as referenced in Agency's Safety Inspection Program.

f) Findings will be published immediately following mitigation actions. If employee identification is available, direct feedback regarding mitigation will be provided.

Subsection 5.4 SMS Authorities, Accountabilities, and Responsibilities

This Agency Safety Plan has assigned specific SMS authorities, accountabilities, and responsibilities to the designated Accountable Executive; Chief Safety Officer; Agency's Leadership/Executive Management; and Key Staff/Employees as described below:

Subsection 5.4.1 Accountable Executive

Clean Air Express' Accountable Executive is SBCAG Executive Director, currently Marjie Kirn. The SBCAG Executive Director is accountable for ensuring that the Agency's SMS is effectively implemented throughout the Agency's public transportation system. The SBCAG Executive Director is accountable for ensuring action is taken, as necessary, to address substandard performance in the Agency's SMS. The SBCAG Executive Director may delegate specific responsibilities, but the ultimate accountability for the Clean Air Express' safety performance cannot be delegated and always rests with the SBCAG Executive Director. The SBCAG Executive Director is accountable for ensuring that the Agency's SMS is effectively implemented, and that action is taken, as necessary, to address substandard performance in the

Agency's SMS. The Accountable Executive may delegate specific responsibilities, but not accountability for Clean Air Express' safety performance.

The SBCAG Executive Director roles include, but are not limited to:

- Decision-making about resources (e.g. people and funds) to support asset management, SMS activities, and capital investments;
- Signing SMS implementation planning documents;
- Endorsing SMS implementation team membership;
- Ensuring safety concerns are considered and addressed in the Agency's ongoing budget planning process;
- Ensuring transparency in safety priorities: for the SBCAG Board and for the employees;
- Establishing guidance on the level of safety risk acceptable to the agency;
- Assuring safety policy is appropriately communicated throughout the agency; and
- Other duties as required, assigned, or necessary.

Subsection 5.4.2 Chief Safety Officer

The Chief Safety Officer, currently Bob Dockerty, has the authority and responsibility for day-to-day implementation and operation of the Clean Air Express' SMS.

Chief Safety Officer's Roles include:

- Decision-making about resources (e.g., people and funds) to support asset management, SMS activities, and capital investments;
- Overseeing the safety risk management program by facilitating hazard identification, safety risk assessment, and the development and implementation of safety risk mitigations;
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and SBCAG Board on SMS implementation progress;
- Planning safety management training;
- Developing and organizing annual audits/reviews of SMS processes and the Agency Safety Plan to ensure compliance with 49 CFR Part 673 requirements;
- Maintaining safety documentation; and
- Other duties as required, assigned, or necessary.

Subsection 5.4.3 Agency Leadership and Executive Management

The AmericanStar Transport Project Manager comprise Agency Leadership/Executive Management. Responsibilities include but are not limited to:

- Day-to-day implementation of the Agency's SMS throughout the organization;
- Communicating safety accountability and responsibility from the frontline employees to the top of the organization;
- Ensuring employees are following working rules and procedures, safety rules and regulations in performing jobs, and employees' specific roles and responsibilities in the implementation of this Agency Safety Plan and the Agency's SMS;

- Ensuring that employees comply with the safety reporting program including reporting unsafe conditions and hazards to their department management. AmericanStar Transport Project Manager makes sure reported unsafe conditions and hazards are addressed in a timely manner.
- Ensuring that resources are sufficient to carry out employee training/certification and re-training as required by employee job classifications.

Subsection 5.4.4 Key Staff

The agency Key Staff/Employees may include managers, supervisors, specialists, analysts, database administrators, and other key employees who are performing highly technical work and overseeing employees performing critical tasks and providing support in the implementation of this Agency Safety Plan and SMS principles in various departments throughout the agency.

Clean Air Express' Key Staff/Employees responsibilities include but are not limited to:

- Ensuring that employees are complying with the safety reporting program;
- Ensuring supervisors are conducting their toolbox safety meetings;
- Promoting safety in employee's respective area of responsibilities; this means: zero accidents; absence of any safety concerns; perfect employee performance; and compliance with agency rules and procedures and regulatory requirements;
- Ensuring safety of passengers, employees, and the public;
- Responding to customer complaints and expectations for frequency, reliability, and convenience of service;
- Replacing and maintaining aging facilities, equipment, and infrastructure;
- Meeting increasing demands for fixed route, commuter service, and paratransit service;
- Developing and maintaining programs to gather pertinent data elements to develop safety performance reports and conduct useful statistical analyses to identify trends and system performance targets;
- Establishing clear lines of safety communication and accountability for safety performance; and
- Assisting as subject matter experts in safety risk assessment and safety risk mitigation processes.

Section 6 Safety Risk Management (SRM)

The second component of the Clean Air Express' SMS is Safety Risk Management, which includes processes and procedures to provide an understanding of the Agency's operations and vehicle maintenance to allow individuals to identify hazards associated with those activities.

Clean Air Express has implemented a Safety Risk Management process for all elements of its transportation system. As required under 49 CFR section 673.25, the Safety Risk Management process includes the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation.

Subsection 6.1 Safety Hazard Identification

Hazard identification is the first step in the Safety Risk Management process and a key component. It involves these fundamental safety-related activities: Identifying safety hazards and

their consequences; assessing the risks associated with the consequences of the hazards; and developing mitigations to reduce the potential consequences of the identified hazards.

The following is Clean Air Express' methods and processes to identify hazards and consequences of hazards as required by 49 CFR 673.25 (b) Safety hazard identification.

(1) A transit agency must establish methods or processes to identify hazards and consequences of the hazards.

(2) A transit agency must consider, as a source for hazard identification, data and information provided by an oversight authority and the FTA. Hazards and consequences of hazards are identified through a variety of sources, including:

- Employee safety reporting;
- Review of vehicle camera footage;
- Review of monthly performance data and safety performance targets;
- Observations from supervisors;
- Maintenance reports;
- Comments from employees, customers, passengers, and third parties;
- Safety committee, driver and all-staff meetings;
- Results of audits and inspections of vehicles and facilities;
- Results of training assessments;
- Investigations into safety events, incidents and occurrences; and
- Information from FTA and oversight authorities.

When a hazard has been identified, whatever the source, it is reported to the Clean Air Express Chief Safety Officer. The Chief Safety Officer also may identify hazards based on reviews of operations, maintenance activities, and procedures.

The Chief Safety Officer will investigate hazards to collect information and determine if hazards need to be entered into the safety risk assessment process. In following-up on identified hazards, or consequences of hazards, the Chief Safety Officer 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.

Any identified hazard or consequences of hazards that pose an immediate risk to transit operations, the health and safety of employees or the public, or equipment must immediately be brought to the attention of the Accountable Executive and processed through the Safety Risk Management process for safety risk assessment and mitigation. Otherwise, hazards, or consequences of hazards will be prioritized for further Safety Risk Management activity.

Subsection 6.2 Safety Risk Assessment

Safety risk assessment defines the level or degree of the safety risk by assessing the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizes hazards based on the safety risk. The Chief Safety Officer, with assistance from key staff subject matter experts, is responsible for assessing identified hazards and ratings using the safety risk matrix below. Prioritizing safety risk provides the Accountable Executive with the information needed to make decisions about resource application.

The following matrix, adopted from the Transportation Safety Institute (TSI) Participation Guide – SMS Principles for Transit, facilitates the ranking of hazards based on their likelihood of occurrence and severity of their outcome.

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

The measuring goes from A to F with A being frequent or likely to occur frequently and E being improbable or expected that this event will most likely never occur. The designation F is used when potential hazards are identified and later eliminated.

Severity Levels		
Description	Level	Mishap Result Criteria
Catastrophic	1	Could Result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10M
Critical	2	Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M

Severity Levels		
Marginal	3	Could result in one or more of the following: injuries or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100k but less than \$1M
Negligible	4	Could result in one or more of the following: injuries or occupational illness not resulting in lost work day, minimum environmental impact. Or monetary loss less than \$100k.

The Safety Risk Severity Table presents a typical safety risk. It includes four categories to denote the level of severity of the occurrence of a consequence, the meaning of each category, and the assignment of a value to each category using numbers. In this table, 1 is considered catastrophic meaning possible deaths and equipment destroyed and 4 is considered negligible or of little consequence with two levels in between.

Safety Risk Probability and Safety Risk Severity are combined into the Safety Risk Index Ranking to help prioritize safety risks according to the table below.

Safety Risk Assessment Matrix				
Severity → Probability ↓	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
A-Frequent	1A	2A	3A	4A
B- Probable	1B	2B	3B	4B
C-Occasional	1C	2C	3C	4C
D- Remote	1D	2D	3D	4D
E- Improbable	1E	2E	3E	4E
F- Eliminated				
Safety Risk Index Ranking				
1A, 1B, 1C, 2A, 2B	High	Unacceptable		
1D, 2C, 3A, 3B	Serious	Undesirable - With management decision required		
1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B,	Medium	Acceptable - with review by management		
4C, 4D, 4E	Low	Acceptable - without review		

The Chief Safety Officer documents recommendations regarding hazard rating and mitigation options and reports this information to the Accountable Executive.

Subsection 6.3 Safety Risk Mitigation

The Chief Safety Officer, assisted by Key Staff subject matter experts, reviews current safety risk mitigations and establishes procedures to (1) eliminate; (2) mitigate; and (3) accept specific risks. Prioritization of safety remediation measures is based on risk analysis and a course of action acceptable to Clean Air Express management.

The safety risk must be mitigated if ranked as Unacceptable (High- Red). Those safety risks that have been mitigated, even those mitigated risks shown as Acceptable status (Low -Green) undergo regular and consistent monitoring to ensure the mitigation strategy is effective.

The Clean Air Express has policies and procedures in place to minimize the types of risks that potentially exist including:

- Development and deployment of policies and procedures that address known hazards and risks,
- Discussion of other actions, strategies and procedures that might help safeguard against unknown/unforeseen risks,
- Training of drivers and other agency staff on all safety policies and procedures;
- Training of drivers and other agency staff on methodologies for handling emergencies; and
- Training of drivers and staff on proper and effective use of emergency equipment and communication technologies and protocol as laid out in the AmericanStar Safety Manual.

Section 7 Safety Assurance

The third component of the Agency's SMS is Safety Assurance, which ensures the performance and effectiveness of safety risk controls established under safety risk management. Safety assurance also helps ensure that the organization meets or exceeds its safety objectives through the collection, analysis, and assessment of data regarding the organization's performance. Safety assurance includes inspection activities to support oversight and performance monitoring.

The Clean Air Express monitors its operations and maintenance protocols and procedures, and any safety risk mitigations to ensure that it is implementing them as planned. Furthermore, the Agency investigates safety events (as defined in the National Transit Database Safety and Security Reporting Manual) and any reports of non-compliance with applicable regulations, standards, and legal authority. Finally, the Agency continually monitors information reported to it through any internal safety reporting programs, including the employee safety reporting program.

In accordance with 49 CFR section 673.27(b) key elements of Clean Air Express' Safety Performance Monitoring and Measurement are shown below in subsection 7.1:

Subsection 7.1 Safety Performance Monitoring and Measurement

As part of the Safety Assurance Process, Clean Air Express:

- Monitors the system for compliance with, and sufficiency of, the Agency's procedures for operations and maintenance through:
 - Safety audits;
 - Informal inspections;
 - Group Safety Surveys for drivers and buses;
 - Employee safety reporting program;
 - Investigation of safety occurrences;
 - Safety review prior to the launch or modification of any facet of service;
 - Daily data gathering and monitoring of data relating to the delivery of service;
 - Daily Safety Inspections by drivers for tires, lights, belts, hoses and fluids
 - Regular vehicle inspections and preventative maintenance; and
 - Continuous feedback loop between leadership and all levels of the Agency.
- Monitors its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended through:

- 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.
- Conducts investigations of safety events to identify causal factors; and
- Monitors information reported through any internal safety reporting programs.
 - The Chief Safety Officer routinely reviews safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer ensures that the issues and concerns are investigated or analyzed through the safety risk assessment process; and
 - The Chief Safety Officer also reviews the results of internal and external reviews, including audits and assessments, with findings affecting safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations. The Chief Safety Officer discusses relevant safety issues and concerns with the Accountable Executive and executive management and documents the results of these reviews.

In the event of a fatality, the Clean Air Express complies with all FTA drug and alcohol requirements.

In California, every driver involved in an accident that results in death, injury, or property damage over \$10,00, effective January 1, 2017, must report the accident on a Report of Traffic Accident Occurring in California (SR 1) form to DMV. The report forms are available at www.dmv.ca.gov, by calling 1-800-777-0133, and at CHP and DMV offices. Also, under California Vehicle Code section 16002(b) the driver of a vehicle that is owned or operated by a publicly owned or operated transit system, or that is operated under contract with a publicly owned or operated transit system, and that is used to provide regularly scheduled transportation to the general public or for other official business of the system shall, within 10 days of the occurrence of the accident, report to the transit system any accident of a type otherwise required to be reported pursuant to California Vehicle Code section 16000(a). The Clean Air Express requires driver notification to the Clean Air Express immediately and maintains records of any report filed pursuant to this paragraph.

Section 8 Safety Promotion

The fourth component of the Agency's SMS is Safety Promotion, which includes a combination of training and communication of safety information to employees to enhance the Agency's safety performance. Safety Promotion sets the tone for the SMS and helps Clean Air Express to establish and maintain a robust safety culture. As required under 49 CFR 673.29, Safety Promotion has two-components: (1) competencies and training; and (2) Safety Communication.

Subsection 8.1 Competencies and Training

Executive Management ensures that all Agency employees, and contractors, attend training provided to understand their specific roles and responsibilities for the implementation of SMS. Clean Air Express provides SMS training in the following areas:

All Employees

- Understanding of Safety Performance Targets;
- Understanding of fundamental principles of SMS;
- Understanding of Safety Reporting Program – Reporting unsafe conditions and hazards/near misses; and
- Understanding of their individual roles and responsibilities under SMS.

Managers and Supervisors

- Understanding of Safety Risk Management;
- Understanding of Safety Assurance;
- Understanding of Safety Promotion; and
- Understanding of their individual roles and responsibilities for SMS.

Executive Management:

- Understanding of management commitment to and support of all SMS activities.

All Agency employees and contractors are required to acquire the competencies and knowledge for the consistent application of their skills as they relate to safety performance objectives. Clean Air Express dedicates resources to conduct effective safety-related skill training. The scope of the safety training is appropriate to each Agency employee's, or contractor's employee, individual safety-related job responsibilities and their role in SMS. Components of Clean Air Express' skill-related training include:

- Conducting training needs analyses to ensure that the right information is being taught to the right Agency employee and contractor employee using the most efficient training methods;
- Communicating purpose, objectives, and outcome;
- Ensuring relevant content by directly linking training to the trainee's job experiences so trainees are more motivated to learn;
- Using active hands-on demonstrations and practice to demonstrate skills that are being taught and provide opportunities for trainees to practice skills;
- Providing regular feedback during hands-on practice and exercises; and
- Reinforcing training concepts in the post-training work environment by giving Agency employees and contractor employees opportunities to perform what they've learned.

Clean Air Express conducts refresher training quarterly during employee safety meetings.

Subsection 8.2 Safety Communication

Clean Air Express communicates safety and safety performance information throughout the 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 an employee safety reporting program.

Ongoing safety communication is critical and Clean Air Express ensures communication occurs up, down, and across all levels of the organization. Any lessons learned are communicated to all concerned. Management commitment to address safety concerns and hazards is communicated

on a regular basis. Management encourages and motivates employees to communicate openly, authentically, and without concern for reprisal; ensures employees are aware of SMS principles and understand their safety-related roles and responsibilities; conveys safety critical information such as accident data, injuries, and reported safety concerns and hazards and their resolutions to employees. Clean Air Express' tools to support safety communication include:

- Safety bulletins;
- Safety notices;
- Posters;
- CDs or USB flash drives or online safety video access;
- Newsletters;
- Briefings or Toolbox talks;
- Seminars and workshops;
- New employee training and refresher training;
- Intranet or social media; and
- Safety Committee Meetings,

Section 9 Documentation

Pursuant to 49 CFR section 673.31, Clean Air Express maintains records related to this Agency Safety Plan and SMS implementation for a minimum of three years. These documents include but are not limited to the results from SMS processes and activities. Clean Air Express will make these documents available to the FTA, FTA Region 9, Caltrans, and other Federal and State agencies upon request. They include:

AmericanStar Safety Manual

Certification of Road Test

Safety Management Cycle

Employee Handbook

Clean Air Express Drug Policy

Safety Highlights