



PUBLIC TRANSPORTATION AGENCY SAFETY PLAN (PTASP)

V2 09/16/2020

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Revision Record

Version	Date	Nature of Revision	Updated By	Approved By
191115 V1	11/15/2019	Developed the DRAFT Intercity Transit PTASP according to the FTA Guideline for a PTASP development.	Jason Hanner	Ann Freeman-Manzanares
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Safety Management Policy

Background

Intercity Transit operates fixed route, paratransit, and vanpool service. These services are directly operated by Intercity Transit. Intercity Transit does not use contractors to perform any transit service nor does Intercity Transit provide any transit service on the behalf of any other transit agency. Intercity Transit receives federal funds to operate these transit services. Federal funding can vary from year to year. For example, in 2019, Intercity Transit received types 5307, 5337, and 5339 funding.

Mission and Policy Statement

The management of safety is one of our core business functions. Intercity Transit is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all our transit service delivery activities take place under a balanced allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting or exceeding established standards. All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the General Manager. Intercity Transit's commitment is to:

- **Support** safety efforts through the provision of appropriate resources, which will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety;
- **Integrate** safety as a primary responsibility of all managers and employees;
- **Clearly define** for all staff, that together we are accountable and responsible for our own safety performance and the performance of our safety management system;
- **Establish and operate** a hazard identification, and risk evaluation program, in order to eliminate or mitigate safety risks, including an employee safety reporting program as a fundamental source for safety concerns and hazard identification;
- **Ensure** that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;
- **Comply** with legislative and regulatory requirements and standards;
- **Ensure** that sufficient skilled and trained staff are available to implement safety management processes;

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

By signing below, Intercity Transit’s General Manager certifies that this PTASP meets FTA’s standards.

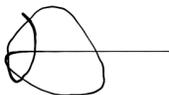
Ann Freeman-Manzanares

Ann Freeman-Manzanares, General Manager

9/21/2020

Date

Approved by the Intercity Transit Authority Board (ITA) and signed by the Board Chair on behalf of the entire ITA Board.



Ryan Warner, ITA Chair

9/21/2020

Date

Purpose and Applicability

The purpose of this plan is to establish a structured safety management approach. This Public Transportation Agency Safety Plan (PTASP) addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan. This plan will effectively control operational safety risks and will allow the Agency to improve its safety performance:

- Convey a top-down management approach to the commitment of safety.
- Define the responsibilities and accountabilities of all employees.
- Provide approaches to document the implementation of the PTASP through guidelines and policies.
- Establish the Agency's safety goals and objectives while ensuring we are following industry standards and federal recommendations.
- Set safety performance and Key Performance Indicators (KPI's) to ensure the Agency achieves its safety objectives.
- Define acceptable levels of safety performance for provided services.
- Launch safety programs that document Intercity Transit's commitment to safety.
- Provide a foundation and guide to implement, evaluate, and improve safety policies and procedures, the safety risk management process, and to achieve the Agency's related goals and objectives.

This PTASP applies to all Intercity Transit operations. All departments and divisions are required to ensure that facilities, equipment, supplies, practices, and procedures meet or exceed applicable federal, state, and local standards as well as the Intercity Transit SMS. Individual departments are responsible for documenting specific procedures tailored to their business as needed.

As a part of the approval process of Intercity Transit's PTASP, all managers and directors will be required to review the document and make recommendations. This will ensure that management is familiar with the ASP. Once the ASP has been approved by the ITA, the Safety Department will send out email communications to all employees and make the document available for them to read. Once per quarter the Safety Department will send out communications promoting the safety management policy in one of the following ways:

- Employee email
- Safety bulletins
- Annual refresher trainings

Interface with Internal Documents

The following Intercity Transit documents are incorporated by reference as part of the Agency's Public Transit Agency Safety Plan:

- Accident Prevention Plan
- Operators Manual
- Spill Prevention and Emergency Cleanup Plan
- Foul Weather Plan
- Active Threat Response Plan
- Emergency Response Plan
- Fire Prevention Response Plan

*These documents are available upon request.

Safety Goals

GOAL 1: SMS to Reduce Casualties/Occurrences

Use a Safety Management Systems framework to identify safety hazards, mitigate risk and reduce injuries and property losses.

GOAL 2: SMS to Foster a Robust Safety Culture

Foster Agency-wide support for transit safety by establishing a culture that holds Agency leaders accountable for safety and ensures all employees take an active role in securing transit safety; and cultivating a safety culture in which employees are comfortable and encouraged to bring safety concerns to the attention of Agency leaders.

GOAL 3: SMS to Enhance System Reliability

Provide safe and reliable transit operations by assuring that all vehicles, equipment and facilities are regularly inspected, maintained and serviced as needed.

Concepts of SMS Operations:

The four components of Intercity Transit's Safety Management System are:

- **Safety Policy** – Establishes our commitment to continually improve safety; defines the methods, processes, and organizational structure needed to meet safety goals.
- **Safety Risk Management (SRM)** – Determines the need for, and adequacy of, new or revised risk controls based on the assessment of acceptable risk.
- **Safety Assurance (SA)** – Evaluates the continued effectiveness of implemented risk control strategies; supports the identification of new hazards.
- **Safety Promotion** – Includes training, communication and other actions necessary to create a positive safety culture at all levels within the Agency.

Safety Accountability and Responsibility

Employee safety is a critical component of a transit safety program. In Washington State, employee safety is regulated by the Washington State Department of Labor & Industry's Department of Safety and Health (DOSH), and requires:

- A written Accident Prevention Plan
- A workplace free of recognized hazards
- Safety Committees
- Safety Bulletin Boards
- First Aid
- Personal Protective Equipment (PPE)
- Lighting
- Housekeeping
- Drinking water, restrooms, and washing facilities
- Accident Reporting

Each employee is required to carry out specific system safety responsibilities, depending on their position, in compliance with the PTASP.

Safety Responsibilities of the Accountable Executive/General Manager (GM)

Intercity Transit's General Manager (GM) as the Accountable Executive, has the ultimate responsibility for safe and secure operations of Intercity Transit. The Accountable Executive shall ensure that the agency's Safety Management System (SMS) is effectively implemented, throughout the public transportation agency's facilities and services. The Accountable Executive shall ensure action is taken, as necessary, to address substandard performance in the agency's SMS. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for Intercity Transit's safety performance cannot be delegated and always rests with the Accountable Executive. Our Accountable Executive meets the requirements specified in [673.5](#) and [673.23\(d\)\(1\)](#).

- Acts as the Agency's safety advocate;
- Has full authority for human resource issues;
- Maintains authority for major financial issues;
- Directs responsibility for the conduct of the Agency's affairs;
- Has final authority over Agency operations;
- Establishes and promotes safety policy;
- Collaborates with all departments to establish the Agency's safety objectives and safety targets and;
- Has final responsibility for the resolution of all safety issues.

Safety Responsibilities of the Chief Safety Officer (CSO):

The Safety Program Manager, as the Agency's designated Chief Safety Officer (CSO), has the authority and responsibility for the day-to-day implementation and operations of the Agency's Safety Management System (SMS) and reports directly to the GM. The CSO is responsible for providing resources and executive-level safety advocacy and direction to the Safety Division, which manages day-to-day implementation of the Agency's SMS. Our CSO is adequately trained and meets the requirements specified in [673.5](#) and [673.23\(d\)\(2\)](#). Some of the duties of a CSO may include:

- Overseeing hazard management practices
- Overseeing Intercity Transit's accident investigations
- Communicating with executive leadership and the Board of Directors.
- Overseeing the agency's safety certification
- Serving as the agency's SMS Subject Matter Expert
- Coordinating key staff to support SMS implementation
- Facilitating the development, implementation, and continuous improvement of SMS processes and activities
- Ensure safety related training meets federal, state and local requirements.
- Work with all departments to ensure employees have received all necessary safety trainings.
- Procuring technical resources for SMS implementation
- Socializing SMS activities with agency executives and staff as necessary
- Communicating SMS implementation progress and challenges

Safety responsibilities of the Safety Program Manager:

The safety of Intercity Transit's operations and activities rests with the relevant agency managers. The Safety Program Manager's role is to assist those managers with safe operations. The duties of the Safety Program Manager include taking a lead role in:

- Developing/maintaining safety policies, plans, procedures and processes and developing and maintaining a proactive SMS Plan/program.
- Providing support for developing realistic data-driven safety performance indicators and safety performance targets.
- Engaging in safety audit activities, including verifying and updating the plan to ensure compliance with the SMS Plan and relevant legislation, guidelines and standards.
- Providing advice, interpretation and recommendations over technical matters such as safety design and systems in new revenue vehicle purchases; facility renovations; decommissioning of old equipment; and other areas (e.g., standards for safe working,

job hazard analysis and assisting with the development of Standard Operating Procedures (SOPs)).

- Coordinating closely with Operations on policies, plans, standards and programs related to bus operator activities that involve passenger injuries or incidents, pedestrian incidents or incidents with other road users (e.g., Collisions), preventing and mitigating transit worker assaults, emergency response and security procedures for transportation events.
- Providing support and direction on programs with a region-wide significance, such as best practices and fatigue management guidelines, in which the Agency works with the Washington State Transit Insurance Pool (WSTIP).
- Address conduct of operations in the safety management plan based on risk.
- Prioritize use of safety resources and support.
- Provide and support ongoing training and education programs that maintain competency in safety-critical areas.
- Measure and report program effectiveness in a form that is useful and relevant.

Safety Responsibilities of Directors and Managers:

- All Directors and Managers will ensuring that sufficient resources are available to achieve the outcomes of the SMS Plan.
- To demonstrate their ongoing support, Directors and managers will:
 - a. Actively support and promote the SMS Plan by reviewing each year the sections that apply to their respective departments and managerial duties;
 - b. Cooperate with the CSO;
 - c. Ensure due processes and procedures are in place for safe operations;
 - d. Continually monitor their areas of responsibility, as outlined in the SMS Plan.

Safety Responsibilities of Supervisors:

Provide supervision of work and staff at all times. Provide information, instruction and training to ensure Intercity Transit effectively considers and implements its safety policy and programs.

Supervisors are accountable to ensure that employees understand and comply with safety processes/procedures and reporting. When work assigned to an employee includes executing safety-critical tasks, the supervisor shall ensure the safety-critical task can be completed, even if it requires putting other work aside until the safety task is completed.

Safety Responsibilities of Intercity Transit Employees:

All employees are responsible for and empowered to:

- Ensure their work areas and equipment are in safe condition;
- Ensure every task/job performed is completed safely and with no adverse consequences;
- Identify, assess, control and report hazards;
- Cooperate with the CSO, public safety officials, agency staff, and groups such as the Safety Committee;
- Safeguard and look out for co-workers and the public;
- Follow established procedures and policies;
- Identify and report situations where procedures are not adequate;
- Ask for assistance if their skills, physical capabilities and/or knowledge are not adequate to complete the task;
- Stop and report work they deem unsafe; and
- Demonstrate safe work behaviors and practices.

Document Implementation

Once the PTASP is approved and signed by the General Manager and ITA, the Safety Department will work with each department for implementation. Implementation may include the following:

- Department specific employee training
- Ensuring each department is collecting data needed to monitor the ASP effectiveness
- Communicate the ASP through safety bulletins
- Maintain communication with Senior Management on how the ASP is performing
- Communicate the results of the ASP performance to employees on a quarterly basis

Documents created by the ASP will be stored either electronically or filed for a minimum of 3 years. All documents will be made available to the FTA or other oversight agencies upon request. Documents may include but not limited to the following:

- Risk assessments
- Risk assessment surveys
- Site safety inspections
- Internal and external audits
- Safety data sheets (SDS)
- Event/Incident reports and investigations
- Employee safety reporting
- Onboard operator observations
- Training records

Workplace Chemicals

Intercity Transit will comply with state and federal Hazard Communication, or Right to Know, laws as defined in agency policy EX-0011-PO. All chemical products are inventoried and Safety Data Sheets (SDS) are made available for each chemical on the inventory. Intercity Transit uses the Washington State Transit Insurance Pool (WSTIP) program for access to SDSs. Additionally, Intercity Transit can add SDSs if they are not already included. Intercity procedures VM-7031-PR and VM-7034-PR define processes for adding chemicals to the agency inventory and proper storage for safety and compliance. Per state and local requirements, Intercity reviews and updates our hazardous material inventory annually.

All employees must receive Hazard Communication training as required by state and federal laws. Even office employees may be exposed to chemicals, such as printer toner, whiteboard cleaner or other office chemicals, and must receive a basic level of Hazard Communication training. Employees who work with industrial chemicals may require additional training on the hazards of those chemicals, especially if they contain lead, chromium, asbestos, methylene chloride or other regulated chemicals.

Plan Reviews and Recordkeeping

The Safety Department will be responsible for coordinating the annual review and update of the Agency's PTASP. The ASP will be reviewed in November of each year with updates completed by December 31. Representatives from participating departments are required to contribute to the review process. An email will be sent to all stakeholders in October reminding them to review the plan. All suggested edits will be sent to the Safety Department. The Safety Program Manager or designee will make the appropriate updates to the plan. Once the updates have been made, the plan will be sent to the GM and Authority Board for approval, if necessary.

Safety Risk Management

Intercity Transit's Safety Risk Management (SRM) component is comprised of the processes, activities, and tools that the Agency uses to identify and analyze hazards, as well as, the mitigation of those hazards and any residual risk. The flow chart below describes the SRM process. Furthermore, the CSO will serve as a central receiving hub for safety-related data and will serve as a resource for Agency departments as they establish goals, benchmarks and KPIs. Each year the Safety Department will conduct an internal assessment of one component of the PTASP – Safety Policy, Safety Risk Management, Safety Assurance, or Safety Promotion. Findings will be shared with the appropriate Agency employees and executive staff.

Hazard Identification and Analysis

As the first two steps in Safety Risk Assessment process, hazard identification and analysis, are tools the Agency uses to identify and address hazards before they escalate into incidents or accidents. At Intercity Transit, hazards are identified through the following activities:

- Employee safety reporting
- External safety reporting (includes: riders and other public agencies or organizations we intersect or coordinate with)
- Observations of operations
- Risk Assessment and Impact Analysis (RAIA)
- Safety inspections
- Incident reporting and investigation
- Incident, injuries, and accident history
- Agency Safety Committee discussions
- Legislation, industry standards, checklist or external consultants
- Data trending reports made available through incident, injury and accident history, insurance carriers (WSTIP), and local authorities
- Review and audit of safety policies and procedures, and safety instructions for equipment and materials.
- During audits performed by FTA, WA Department of Labor and Industries, and other federal, state and local government agencies.

When hazards are identified, they are addressed in one or more of the following manners:

- Immediate resolution if possible
- Reporting to a higher level within the organization (if it cannot be fixed by the person identifying the hazard) for resolution
- Reporting the hazard to the representative safety committee for review and resolution
- Reporting the hazard to the Safety Department for review and incorporation of possible adjustments or modified practices/procedures to resolve the hazard

Hazards are rated in terms of their effects on employees and/or the transit system. Severity categories are defined as:

- **Category I – Catastrophic**
Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies may cause **death or major system loss**, thereby requiring immediate cessation of the unsafe activity or operation.
- **Category II – Critical**

Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies may cause **severe injury or illness or major system damage** thereby requiring immediate action including immediate cessation of the unsafe activity or operation.

➤ **Category III – Marginal**

Operating conditions may cause **minor injury or illness or minor system damage** and human error, environment, design deficiencies, sub-system or component failure or procedural deficiencies can be counteracted or controlled without serious injury, illness or major system damage.

➤ **Category IV – Negligible**

Operating conditions are such that human error, environment, design deficiencies, sub-system or component failure or procedural deficiencies will result in **no, or less than minor, illness, injury or system damage**.

Job Hazard Analysis (JHA)

A job hazard analysis (JHA) describes the high-risk work activities that take place in a workplace, the hazards and risks arising from these activities, and the measures that should be put in place to control the risks. A JHA focuses on:

- The job steps
- The potential hazards associated in undertaking the job steps
- The hazard control measures required to eliminate the risk of injury, or reduce the risk to an acceptable level

The primary purpose of a JHA is to help supervisors and workers develop, implement, and monitor workplace control measures and are established to ensure high risk work is carried out safely.

A Job Hazard Analysis (JHA) must:

- a. Specify hazards relating to the work and risks to health and safety associated with those hazards.
- b. Describe the measures that must be put in place to control the risks.
- c. Describe how control measures are to be implemented, monitored and reviewed.

- d. Take into account all relevant matters, including circumstances in the workplace that may affect the way in which the task is carried out. This must be expressed in a way that is readily available and understandable to employees who use it.

The JHA must be reviewed, approved, and signed by the supervisor before the task is started. When training the employee, the supervisor should give the employee a copy of the JHA and document any training which has taken place. Understanding every job step is very important! Whenever a job step changes or a new step is introduced, the JHA must be reviewed/updated, and employee retraining is to take place.

The key reasons for completing a JHA are to improve workplace safety, encourage teamwork (especially with new employees), involve everyone performing the job in the process, and elevate awareness!

Employee Safety Reporting Program

At Intercity Transit, our objective is to cultivate and foster a proactive safety culture in which employees are comfortable and encouraged to bring safety concerns to the attention of the Agency leaders. We recognize that our employees are most familiar with the details of their respective jobs and work environment, which makes their input crucial to maintaining safety in the workplace. Therefore, employees must promptly report safety concerns such as:

- A witnessed unsafe act
- Unsafe conditions
- Near miss

Intercity Transit will ensure 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.

There are several ways employees can report their safety concerns to management:

1. Report directly to their supervisors or managers
2. Report directly to the Safety Department
3. Report through a Safety Committee Representative
4. Via email at safety@intercitytransit.com
5. Via an anonymous web based reporting tool. See Appendix A.

The Chief Safety Officer and Safety Committee routinely review safety data captured via these avenues. When necessary, the Chief Safety Officer, Safety Department, and the Safety Committee ensure that the concerns are investigated or analyzed through the SRM process.

As appropriate, information about reported concerns will be shared with the reporting individual and/or all Intercity Transit employees to raise awareness and share mitigation solutions or best practices.

Customer Reporting

Customers are also our partners in safety. We encourage our customers to bring their safety concerns to our attention, whether through our bus operators or our Customer Service Team. Customer Service contact information is available on every coach and paratransit vehicle. Customers can also visit our website and report safety concerns.

The Customer Service Team is responsible for documenting and forwarding the customer's concern to the appropriate individual or department for resolution.

Observations of Operators

Operations Trainers provide operator observations as outlined below:

- Operations Trainers are required to perform at least one on board evaluation on each operator per year.
- Additional oversight and review opportunities are planned for specific groups, to create positive coaching and help change behavior. These groups include:
 - Operators with less than one year experience (the goal is to evaluate at least 3-4 times the first year);
 - Operators with less than two years' experience (the goal is to evaluate at least 2-3 times);
 - Operators with preventable events or multiple events of any safety-related nature;
 - Special request from the Safety Division, Operations Supervisors and Managers, or the Operations Training Division.
- On board Operator observations are conducted using an Observation Form in the Track-It program.
- Operations Trainers will be responsible for tracking and administering on board observations.

- The Track-It system records information and maintains a record of the evaluation. Operations Trainers, Operations Managers and Supervisors, and Safety may access the information to work on needed training and/or corrective coaching.

Site Safety Inspections

Site safety inspections are performed to:

- Identify hazards, risks and unsafe practices by inspecting areas with a designated department representative or a member of the Safety Committee.
- Proactively take corrective actions by noting and photographing concerning findings and abatement issues. Items which can be abated immediately will be done on the spot and a record of the abatement notated.
- Promote a safe and healthy working environment by providing a systematic and consistent inspection schedule to identify hazards, risk and unsafe practices.
- Serve as a positive performance indicator and encourage safe work practices by documenting that we are achieving our safety goals and acknowledge employees who are observing safety policies when performing their work.

Daily Safety Inspections

Each department completes site safety inspections informally each day. Daily inspections will consist of a department representative walking their immediate work area and correcting any unsafe findings.

Quarterly Safety Inspections

The Safety Division will conduct formal site safety inspections each quarter. These inspections may include Intercity Transit's main headquarters buildings as well as any transit facility operated by Intercity Transit or occupied by Intercity Transit personnel. The Safety Division will ensure that facility safety concerns are routed to the appropriate department for immediate investigation and mitigation.

The Safety Division will use the Track-It Manager program for quarterly inspections. Completed inspection forms are generated from the Track-It Manager program and forwarded to the responsible employee(s) for timely correction. Every inspection is recorded and retained in Track-It.

Event/Incident Reporting and Investigation

The goal of incident reporting and investigation is to record relevant facts related to a safety concern or incident, identify the cause, prevent recurrence and mitigate risk. Root Cause

Analysis (RCA) is a structured process that uncovers the physical, human and latent causes of any undesirable event in the workplace.

In general, there are seven basic root causes of most accidents: Procedures; Training; Communication; Quality Control; Management Systems; Human Engineering and Work Direction.

A Root Cause Analysis will disclose:

- Why the incident, failure, or breakdown occurred.
- How future failures can be eliminated through:
 - Changes to procedures
 - Changes to operation
 - Staff training
 - Design modifications
 - Verification that new and rebuilt equipment are free of defects which may shorten life
 - Confirmation that repair or reinstallation is performed to acceptance standards
 - Identifying factors adversely affecting service life and implementation of mitigating actions.

At Intercity Transit, the term “Event” is commonly referred to as an “accident, incident, or occurrence.” The Event Report includes the following event types:

- a. Collision resulting in injury or property damage;
- b. Non-collision passenger event resulting in injury;
- c. Non-collision employee event resulting in injury or property damage, including security-related incidents and workplace injury and illness reports;
- d. Near Mishap or High Severity Incident (no injury or damage, but injury or damage could have occurred from the event); and

Intercity Transit investigates all events and incidents. Once an event/incident is reported the following takes place:

1. The Fixed Route Dispatcher logs the event/incident and assigns an event number.
2. If the event was a collision with damage/injury or a passenger injury, a road supervisor will respond to the scene and conduct an accident investigation.

3. The Road Supervisor will determine if a post-accident drug and alcohol testing is required for the employee(s) based on information gathered at the scene. If post-accident testing is required, the Road Supervisor will transport the employee directly to the testing site.
4. The employee completes an event report and turns it in to Supervisor or Fixed Route Dispatcher.
5. The Supervisor or Fixed Route Dispatcher reviews the event report for accuracy.
6. The event report is scanned into the computer for electronic storage and the original event report is put in the Fixed Route manager's inbox for review.
7. Once the event report is turned in, this triggers the event to be set up for video download (if applicable).
8. The Fixed Route Manager reviews the event report and video (if applicable) and makes a determination if the event was preventable or non-preventable. If the event was deemed preventable, the Fixed Route manager will issue a letter to the employee with this determination.
9. The Fixed Route Manager brings the event report to the Safety Department.
10. The Safety Department will review all information available (pictures, video, supervisor accident report, etc.) for the event/incident to determine causal factors and conduct a root cause analysis (RCA). The Safety Department may decide to interview all employees involved in the event/incident. If this is necessary, the interview will be confidential and no discipline can come from this interview.
11. The Safety Department ensures event/incident is entered into WSTIP database (Origami).

Incident, Injury, and Accident History

Intercity Transit uses incident, injury and accident statistics to monitor trends, identify areas of risk, and measure the effectiveness of safety programs. Intercity Transit tracks and maintains the incident, injury and accident history via TrackIt and Origami Safety Management Software managed by WSTIP.

Safety Risk Evaluation

A Hazard is a condition with the potential to cause harm. Risk management is a systematic approach to manage workplace hazards. It is a key component in any organization that identifies, evaluates and determines the means of reducing risk to an acceptable level to protect employees, visitors, third party contractors, casual laborers and others who are physically present in the workplace or on Intercity Transit property.

Risk management also protects assets and considers how to avoid losses.

The evaluation consists of:

- Existing controls – Existing processes, devices, practices or controls that act to minimize threats or enhance opportunities, including an indication of how they might be of influence.
- Consequences – A description and rating of the consequence of risk, in terms of the loss or gain that may be experienced if the risk event occurs (Refer to the Safety Risk Evaluation Matrix Severity below for consequence ratings).
- Likelihood – A description and rating of the likelihood of the risk for the full range of risk event consequences (refer to the Safety Risk Evaluation Matrix Likelihood below for likelihood ratings). For opportunities, it is the likelihood of the stated gain being realized if the opportunity is pursued.

Intercity Transit employees assess safety risk subjectively using a Safety Risk Evaluation Matrix (REM). Results of the risk evaluation process will help prioritize the risk and determine whether it is being appropriately managed or controlled. If the risks are acceptable, the hazard will simply need monitoring. If the risks are unacceptable, Intercity Transit will take steps to lower the risk to an acceptable or tolerable level, or to remove or avoid the hazard.

For any contractor working at Intercity Transit property, all safety requirements apply to every member of the contractor's work force so as to protect the safety of the contractors, general public, transit employees and property.

Responsibility for safety at multi-employer worksites has been established through case law, WISHA Regional Directives, and instruction documents for OSHA and Washington Department of Safety and Health (DOSH) inspectors. Accordingly, Intercity Transit has a duty to alert contractors when knowledge of hazards exists. Any unsafe act observed by Intercity Transit staff is not to be ignored and work stoppage may result.

As a condition of working for Intercity Transit, the contractor agrees to abide by all applicable local, state, and federal safety regulations. Contractors are expected to perform their work in a safe manner and not expose themselves, Intercity Transit employees or the public to risk of harm.

Safety Risk Evaluation Matrix

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

High	STOP
Serious	URGENT ACTION
Medium	ACTION
Low	MONITOR

SEVERITY CATEGORIES		
Description	Severity Category	Mishap Result Criteria
Catastrophic	1	Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$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.
Marginal	3	Could result in one or more of the following: injury or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100K but less than \$1M.
Negligible	4	Could result in one or more of the following: injury or occupational illness not resulting in a lost work day, minimal environmental impact, or monetary loss less than \$100K.

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

Safety Risk Mitigation

If the risk is unacceptable, risk controls are developed that will either eliminate the risk or mitigate the risk to an acceptable level. After risk controls are developed, Safety Division will reassess the new controls to ensure they do not produce an alternative risk. A second assessment of the new control will be conducted following the same SRM procedure, beginning at System Description and Task Analysis through the Safety Risk Evaluation. Once satisfied that residual risk has been mitigated to an acceptable level, the new process/solution will be implemented and documented.

Many different means are employed to resolve identified hazards. These include design changes, the installation of controls and warning devices, and the implementation of special procedures. The steps for resolving hazards is as follows:

- **Design for Minimum Risk** – From the initial design, eliminate hazards through design selection.
- **Safety Devices** – Hazards that cannot be eliminated or controlled through design selection shall be controlled using fixed, automatic or other protective safety design features or devices. The agency will perform periodic checks of safety devices.
- **Warning Devices** – When neither design nor safety devices can effectively eliminate or control an identified hazard, devices may be used to detect and generate an adequate warning signal to correct the hazard or evacuate employees. Warning signals shall be designed to minimize the probability of employees responding incorrectly to signals and shall be standardized within similar systems.

- **Procedures and Instruction** – Where it is impossible to eliminate or adequately control a hazard through design selection, engineering or use of safety and warning devices, the agency will use policies, procedures and training to control the hazard. Procedures may include the guidelines of requirements for the use of personal protective equipment. Precautionary notations shall be standardized as specified by management. Safety-critical tasks and activities may require employees to be certified.

When to use Safety Risk Mitigation:

- Daily Operational Systems Assessment – Methods that provide real-time feedback or safety compliance, adherence to established safety norms, or identified job hazards.
- Design – Steps taken to ensure safety requirements are considered in the planning, operation and disposal of all items including shops, facilities and equipment.
- Purchasing Goods – Steps taken to ensure purchased items and equipment are safe to use.
- Purchasing Services – Steps taken to ensure that purchased services are performed in a safe manner.
- Perform asset condition assessments and SMS hazard analyses to ensure compliance with [State of Good Repair](#) standards.

Safety Assurance

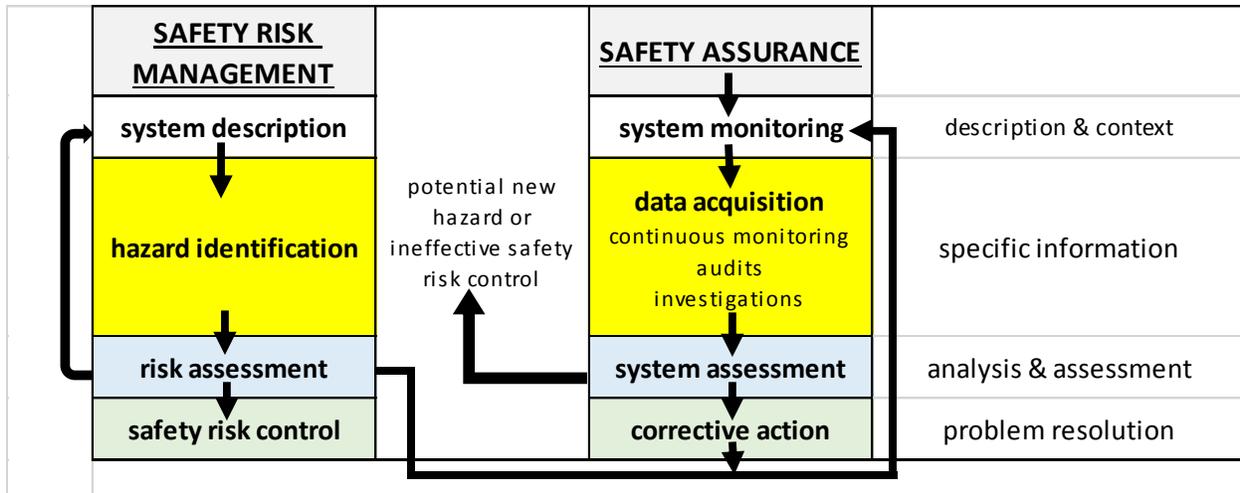
The purpose of Safety Assurance is to evaluate the overall effectiveness of the safety risk controls established under Safety Risk Management and Intercity Transit PTASP. The Safety Division is responsible for monitoring and evaluating the day-to-day operations to ensure that: 1) emerging risks are identified, 2) Intercity Transit is in compliance with regulatory requirements applicable to the SMS plan, and 3) the organization meets or exceeds its safety objectives through the collection, analysis and assessment of data regarding the organization's performance.

Intercity Transit's safety assurance activities for supporting oversight and performance evaluation includes, but is not limited to:

- Monthly KPI Reviews
- Risk Assessment Surveys
- Internal and External Audits
- Employee Surveys

- Internal and External Findings through Observations of Operations
- Committee Reviews

Many activities used in Safety Assurance are the same activities used for hazard identification and analysis. If hazards or system weaknesses are identified, they must be reevaluated using the Safety Risk Management process. The figure below demonstrates the interaction of Safety Risk Management and Safety Assurance components in SMS structures.



There are three subcomponents under Safety Assurance:

- I. Safety Performance Monitoring and Measurement
- II. Management of Change
- III. Continuous Improvement

Safety Performance Monitoring and Measurement

Intercity Transit's first step in Safety Assurance is established Safety Objectives and Performance Targets to meet the Agency's safety goals. Key Performance Indicators (KPIs) are utilized to indicate whether the Agency is achieving its safety objectives and performance targets. All Safety Performance Targets are made available to the State Safety Oversight program (SSO) and Metropolitan Planning Organization (MPO) to aid in the planning process.

Safety Goals, Objectives, and Performance Targets

Safety Performance results and targets will be reviewed each year in January and will be updated by February. Safety Performance Targets will be shared with the State Safety

Oversight (SSO) and Metropolitan Planning Organization (MPO) By February 28th of each year via email. In Thurston County, our MPO is the Thurston Regional Planning Council.

Safety Event Performance Measure

For the purposes of safety event performance measure, FTA uses all safety events that meet a National Transit Database (NTD) major event reporting threshold (events reported on the S&S-40 form). In other words, for this measure, FTA includes only major *safety* events and excludes major *security* events (both of which are reported to the NTD). This means that an agency may have to report a major security event to the NTD, but it would exclude that security event from its safety events performance measure. The NTD defines a safety event as a collision, derailment, fire, hazardous material spill, act of nature (Act of God), evacuation, or other safety occurrence not otherwise classified occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds.

Injuries Safety Performance Measure

For purposes of the injuries safety performance measure, FTA uses the NTD definition of injury (harm to a person requiring immediate medical attention away from the scene) and the injuries reported on both the NTD S&S-40 (major) and S&S-50 (non-major) forms but excludes injuries resulting from assaults and other crimes. This means that an agency may have to report a crime-related injury to the NTD, but it would exclude that injury from its injury performance measure. This also means that injuries safety performance measure includes operator injuries.

2019 Safety Performance							
Mode of Service	Fatalities (Total)	Fatalities (Per 100k VRM)	Injuries (Total)	Injuries (Per 100k VRM)	Safety Event (Total)	Safety Event (Per 100k VRM)	System Reliability
Fixed Route	0	0	6	.18	2	.06	TBD
Paratransit/ Demand Response	0	0	2	.19	1	.09	TBD
Vanpool	0	0	0	0	3	.10	TBD

Vehicle Revenue Miles Driven in 2019	
Fixed Route/Commuter Bus	3,245,099 Miles
Paratransit/Demand Response	1,070,663 Miles
Vanpool	3,102,203 Miles

2020 Safety Performance Targets							
Mode of Service	Fatalities (Total)	Fatalities (Per 100k VRM)	Injuries (Total)	Injuries (Per 100k VRM)	Safety Event (Total)	Safety Event (Per 100k VRM)	System Reliability
Fixed Route	0	0	5	.17	2	.06	TBD
Paratransit/ Demand Response	0	0	2	.19	1	.09	TBD
Vanpool	0	0	0	0	2	.10	TBD

Data Collection

Maintenance, Facilities, Operations, Human Resources, and the Safety Division work collaboratively as a team to collect, analyze, and disseminate the data necessary to demonstrate the effectiveness of the Agency operations system and the SMS. This data comes from a number of sources including, but not limited to:

- Event reports on safety and security incidents, accidents, incidents, injuries and illnesses
- Observation of operations reports
- Internal and external inspection, survey, and audit reports
- Safety comments and emails
- Historic recall
- Seasonal events and effects
- Environmental considerations
- Deployment of new equipment
- Maintenance common fleet issues
- Process review and improvement
- Leadership training
- Emergency planning

- Unplanned events such as weather, natural disasters or extended health emergencies

This safety data is reviewed, discussed, and shared at Management meetings and the Safety Committee.

Key Performance Indicators (KPIs)

The Safety Division uses collected data to establish Key Performance Indicators and baselines for realistic safety performance targets. Safety also uses KPIs to assess and communicate with affected departments within the Agency in a timely manner.

Employee Surveys

Intercity Transit will conduct employee surveys each year to evaluate the work environment, including employee engagement and overall safety culture. The feedback of our employees helps us identify the need for continuous improvement in our systems and practices. We use the employees' survey ratings as one of our Key Performance Indicators.

Internal and External Audits

A Safety Review and Audit is a formal safety and quality assurance process used to evaluate the overall effectiveness, efficiency, and reliability of any transit agency's SMS. Our internal audit program also helps prepare the Agency for the Triannual Review with the FTA. This process, however, does not take the place of regular safety inspections.

Intercity Transit performs auditing to determine compliance with the Agency's PTASP, as well as local, state and federal requirements, and implements corrective action plans in response to audit findings in order to:

- Verify safety programs have been developed/implemented in accordance with the PTASP requirements;
- Assess effectiveness of the agency's system safety programs;
- Identify program deficiencies;
- Identify potential hazards in the operational system and weaknesses in the system safety programs;
- Verify prior corrective actions are being tracked for closure;
- Recommend improvements to the system safety program;

- Provide management with assessment of status and adequacy of system safety program;
- Assure continuing evaluations of safety-related programs, issues, awareness and reporting;
- Promote a clear understanding of success measures; and
- Promote continuous improvement of the Intercity Transit PTASP.

The Safety Department works collaboratively with other departments to develop and maintain auditing schedules and perform the internal audit.

Management of Changes

Hazards may inadvertently be introduced into an operation whenever change occurs. Safety management practices require that hazards that are a by-product of change be systematically and proactively identified and corrected.

Changes may be internal or external to the organization. Examples of external changes include changes in regulatory requirements, disruptions and changes to our operating environment, and changes to service areas. Examples of internal changes include management changes, new equipment and facilities, and new or modified procedures.

A formal process for change management should take into account the following three considerations:

- Criticality of systems and activities
- Stability of systems and operational environments
- Past Performance

New equipment, system expansion and modification, and system rehabilitation often require design, procurement, and deployment efforts.

Once a change is introduced, a Hazard Risk Assessment will be conducted with key stakeholders. An example of the Risk Assessment Form is on Appendix B.

Continuous Improvement Process

Through the process of monitoring, measuring and reassessing our safety risk controls, we gather data to identify the areas where we can improve and strengthen our operating systems.

The aim of continuous improvement in the SMS plan are applied to three general operational areas:

1. Operational Safety Management (such as policies and procedures, infrastructure, and equipment)
2. Individual performance (such as employee performance monitoring); and
3. Systems of control (such as control measures).

Intercity Transit will implement proven industry best practices in transportation safety management systems:

- Evidence of lessons learned incorporated into safety policy;
- Agency benchmarks SMS program performance compared to the rest of the transit industry;
- Surveys of safety cultures are carried out and acted upon; and
- Contractors and volunteers are required to acknowledge and participate in the safety program.

Safety Promotion, Training, and Communication

Intercity Transit believes safety promotion is critical to the success of SMS by ensuring the entire organization understands and embraces its SMS program, policies, procedures and structure. It involves establishing a culture that recognizes safety as a core value, training employees in safety principals, and allowing open communication of safety issues.

Training

Employee Safety Training

All Intercity Transit employees receive New Employee Orientation Training on the basic elements of employee safety. Depending upon job classification, some employees may receive additional training in programs such as Bloodborne Pathogens, Lockout/Tagout and other safety programs required to perform their job safely. Refresher training may be required for certain programs and will be done so in accordance with changes to the agency's safety policies and local, state, and federal requirements.

Operator Training

Intercity Transit offers Commercial Driver License (CDL) training for Coach and Paratransit Operators. Intercity Transit's Operations Trainers documents CDL training, which includes an in-house driver certification process audited by the state. Training

programs are also subject to internal auditing that includes auditing of trainer performance and content. Tracking the number of accidents incurred by new operators is one measure to evaluate the effectiveness of new operator training.

Intercity Transit provides approximately eight weeks of training for new operators, including time spent with an operator mentor. Training begins with the operator selection process. An evaluation of skill sets must be considered during selection. Prospective operators must meet thresholds to advance to the next stage of training; for example, a trainee must obtain a permit before starting classroom training and must pass a skills test prior to moving on to the balance of the class. If a trainee fails a step at a critical point in the training, they may be dropped from the program. Achieving threshold scores is necessary to progress to the next step and is an important component of the training program.

Ride checks provide a chance to correct actions before an accident occurs. A systematic process is used to identify who needs a ride check and when. Ride checks should be conducted with the goal of evaluating performance in a holistic manner, and includes evaluation of:

- Health and wellbeing as it relates to safety
- Customer service
- Diffusing angry customers
- De-escalation techniques
- Operation skills
- Ergonomics

Mechanical Certification and Training

Intercity Transit encourages and supports vehicle maintenance staff to obtain Automotive Service Excellence (ASE) certification by providing incentive pay for staff who have obtained certification. This is provided in the employee contract.

Vehicle Maintenance employees receive training in Preventative Maintenance, repair, and Standard Operating Procedures (SOPs).

Training Assignments and Recordkeeping

Each department maintains training requirements and transcripts for their respective employees.

Further recordkeeping and training documentation can be accessed at:

- TrackIt

- FleetNet

Safety Committee

Safety Committees are required by law to serve as the basic forum to review safety issues and hazards, hazard reports, safety inspection reports, accident investigations and corrective actions. Safety Committee Representatives communicate safety concerns from their work areas to the Safety Committee, and report back to their workgroups. Intercity Transit's Safety Committee is empowered to look beyond required review safety incidents toward opportunities to reduce occurrences by looking for ways to improve the work environment and safety culture at Intercity Transit by acknowledging safe actions and work that contributes to safety in the workplace. Safety Committee meeting minutes are made available to all employees via the Safety bulletin boards.

Safety Bulletin Boards

Intercity Transit has bulletin boards in centrally located areas to display safety and emergency alerts, accident statistics, and other safety education materials. These bulletin boards are updated monthly.

Safety posters are also used to raise awareness among Intercity Transit employees.

Safety Email and Safety Reporting

Intercity Transit uses several methods for employees to report safety issues or concerns.

- Report directly to their supervisors or managers
- Report directly to the Safety Department
- Report through a Safety Committee Representative
- Via email at safety@intercitytransit.com
- Via an anonymous web based reporting tool. See Appendix A.

The Chief Safety Officer and Safety Committee routinely review safety data captured via these avenues. When necessary, the Chief Safety Officer, Safety Department, and the Safety Committee ensure that the concerns are investigated or analyzed through the SRM process.

Employee Recognition Program

Intercity Transit establishes the Employee Recognition Program such as the Thanks to You, Safe Driver, and Years of Service programs to promote safety performance, build morale and focus on achieving the Agency's safety goals.

Definitions

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

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

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

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

Event: Any Accident, Incident, or Occurrence.

FTA: The Federal Transit Administration, an operating administration within the United States Department of Transportation.

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

Incident: 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: 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: The plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.

Occurrence: 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 public transportation system: A provider of public transportation as defined under [49 U.S.C. 5302](#)(14).

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

Performance Target: 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: The documented comprehensive agency safety plan for a transit agency that is required by [49 U.S.C. 5329](#) and this [part](#).

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

Risk Mitigation: A method or methods to eliminate or reduce the effects of hazards.

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

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

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

Safety Management System (SMS) Executive: A Chief Safety Officer or equivalent.

Safety Performance Target: A Performance Target related to safety management activities.

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

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

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

Serious Injury: Any injury which:

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

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

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

State Safety Oversight Agency (SSO): 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](#). In Washington State, the SSO falls under the WA Department of Transportation.

Transit Agency: An operator of a public transportation system.

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

Acronym Glossary

Acronym	Definition
APP	Accident Prevention Plan
ASP	Agency Safety Plan
BPECP	Bloodborne Pathogens Exposure Control Plan
CBA	Collective Bargaining Agreement
CDL	Commercial Driver License
CEO	Chief Executive Officer
CSO	Chief Safety Officer
EA	Emergency Alarm
EIR	Employee Injury Rate
EOC	Emergency Operations Center
EWS	Early Warning System
FPWP	Fall Protection Work Plan
FTA	Federal Transit Administration
FWEP	Foul Weather Emergency Plan
GM	General Manager
HCP	Hazard Communication Plan
HD	Hard Drive
IT	Intercity Transit
ITA	Intercity Transit Authority Board
JHA	Job Hazard Analysis
KPIs	Key Performance Indicators
LMS	Learning Management System
MPO	Metropolitan Planning Organization (TRPC)
NTD	National Transit Database

PIR	Passenger Injury Rate
PRO	Public Records Officer
PTASP	Public Transportation Agency Safety Plan
RAIA	Risk Assessment and Impact Analysis
RCA	Root Cause Analysis
REM	Risk Evaluation Matrix
SA	Safety Assurance
SMS	Safety Management System
SOP	Standard Operating Procedure
SRM	Safety Risk Management
SSO	State Safety Oversight
TAMP	Transit Asset Management Plan
TRPC	Thurston Regional Planning Council
VRM	Vehicle Revenue Mile
WSTIP	Washington State Transit Insurance Pool

Appendix A



Have a safety concern? Want to report a safety issue? Want to report a near miss? Have a safety suggestion or idea? Intercity Transit has a website to make reporting safety issues easy. This is a third party website and you can remain completely anonymous if you choose. If you have a smart phone, simply use your phones camera to scan the QR Code below. It will take you to the safety reporting page. You can also type the address below in a web browser. This is for employee reporting **ONLY**, so please do not share this with customers. Again, you can remain anonymous if you want, but if you would like to be contacted regarding your concern, you will need to fill out your contact information.

Additionally, this will replace the Safety Committee Comment boxes previously located in employee break areas.

You can also email safety@intercitytransit.com with your concern or issue.

If you have any questions, please feel free to contact Jason Hanner at either ext. 5043 or jhanner@intercitytransit.com.

<https://trackitnearmiss.com/3925423432423-2/>



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