
Sun Metro Agency Safety Plan

Revision 4
September 28, 2023

Sun Metro | City of El Paso
10151 Montana
El Paso, TX 79925

Approved on: _____



Table of Content









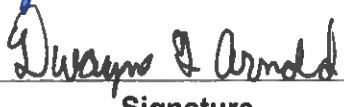
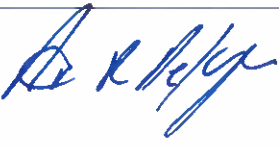
Contents

Table of Contents	2
Plan Approval Documentation	5
DEFINITIONS.....	10
Acronyms	15
1. Introduction	18
1.1. Organization.....	18
2. Annual PTASP Review and Update Process	20
2.1. Control and Update Procedures.....	20
2.2. Implementation Activities and Responsibilities.....	21
2.3. Annual Sun Metro PTASP Review	21
2.3.1. Control of Documents.....	22
2.3.2. Control of Records	23
3. Safety Management Policy Chapter (CFR 673.23)	24
3.1. Safety Management Policy Overview.....	24
3.2. Safety Management Policy Section.....	24
3.3. Performance Target (based on Nat. Pub. Trans Safety Plan).....	25
3.3.1. Fatalities.....	25
3.3.2. Injuries.....	25
3.3.3. Safety Events	26
3.3.4. System Reliability	26
3.3.5. Performance Measures	27
3.3.6. Sun Metro Performance Table by Mode.....	27
3.4. Sun Metro Key Staff - Accountabilities and Responsibilities	29
3.4.1. Sun Metro Director (Accountable Executive).....	29
Sun Metro Organizational Chart.....	30
3.4.2. Transit Chief Safety Officer (CSO) or SMS Executive.....	32
3.4.3. Streetcar Safety Manager (SSM)	32
3.4.4. Transit Safety Manager (Fixed-Route)	33
3.4.5. Sun Metro Assistant Director of Transit Operations	35
3.4.6. Chief Streetcar Officer.....	37
3.4.7. Streetcar Superintendent of Operations	38
3.4.8. Transit Superintendent of Fixed Route Operations	39

3.4.9	Sun Metro Transit Assistant Superintendent of Operations.....	41
3.4.10	Transit Safety & Security Officer	43
3.4.11	Sun Metro LIFT	44
3.5	Employee Safety Reporting.....	46
3.5.7	Disciplinary Policy	48
3.5.8	Employee Reporting Methods	48
3.6	Safety Management Policy Communication.....	51
4	Safety Risk Management (49 CFR 673.25).....	52
4.1	Safety Risk Management Overview	52
4.2	Safety Hazard Identification	53
4.3	Safety Risk Assessment.....	53
4.3.1	Hazard Analysis	54
4.3.2	Hazard Severity.....	54
4.3.3	Hazard Probability.....	55
4.4	Safety Risk Mitigation.....	59
5.	Safety Assurance (49 CFR 673.27)	60
5.2	Safety Assurance Process Overview	60
5.3	Safety Performance Monitoring and Measurement Section	61
5.3.1	Process to monitor compliance with operation and maintenance procedures...	61
5.4	Process to conduct investigations of safety events to identify causal factors....	64
5.4.1	Accident Notification.....	64
5.4.2	Event Investigation Methods	64
5.4.3	Photographs.....	65
5.4.4	Reports.....	65
5.5	Continuous Improvement Section	66
5.5.1	Internal Safety Audit.....	66
5.5.1.9	Review Completeness.....	69
5.5.2	Rules Compliance	69
5.5.2.1	Review of Rules and Procedures	69
5.5.2.2	Process for Rules Compliance	69
5.5.2.3	Compliance Techniques – Operations and Maintenance Personnel.....	70
5.5.2.4	Compliance Techniques – Supervisory Personnel.....	70
5.5.2.5	Documentation	70
5.5.3	Local, State, and Federal Rules Compliance	70
5.5.3.1	Risk Reduction Program	70

5.5.3.2	Exposure to Infectious Diseases	71
5.5.3.3	Assault Awareness and Prevention for Transit Operators	71
5.6	Corrective Actions	72
5.7	Management of Change	73
6.	Safety Promotion Chapter (49 CFR 673.29)	76
6.1.	Competencies and Training Section	76
6.1.1.	Training and Certification Program	76
6.1.2.	Competency	77
6.1.3.	Hazardous Materials Training	78
6.1.4.	Drug and Alcohol Program / Training	78
6.1.5.	Recordkeeping	80
6.2.	Safety Communication:	80
6.2.1.	Safety Committees	82
7.	Emergency Preparedness and Response Plan	84
7.1.	Planning	84
7.1.1.	Sun Metro Emergency Preparedness and Continuity Plan	84
7.2.	Responsibilities for Emergency Preparedness	84
7.2.1.	Crisis Communications Plan	85
7.3.	Coordinated Schedule	85
7.3.1.	Interdepartmental / Interagency Coordination	85
7.4.	Emergency Drills and Exercises	86
7.5.	Emergency Procedures	87
7.5.1.	Emergency Preparedness Training	87
7.6.	Familiarization Training	87
	Appendices	88
A.	Mass Transit Board Approval Resolution	89
B.	TxDOT Approval Letter	90
C.	Configuration Management Plan	91

Plan Approval Documentation

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Name of Entity	El Paso Streetcar - Sun Metro	
Approval by Joint Labor-Management Committee (Streetcar Safety Committee)	Name of Individual/Entity That Approved This Plan	Date of Approval
	Labor-Management Safety Committee	10-12-2023
	Relevant Documentation (title and location)	
	Public Transportation Agency Safety Plan (PTASP)	
Name of Entity	Mass Transit Department - Sun Metro	
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	Mass Transit Board	
	Relevant Documentation (title and location)	
	Approval resolution	

PTASP Revision History Table

Date	Revision	Description of Change	Section or Page
April 2020	0	Original Document	
April 2021	1	Update headers and footers -	
		Terms and Definitions - 1. Accident 2. Drill 3. Designated personnel 4. Key Staff	
		Name of AE -	3.2
		Update Signature table Add Fixed Route Operations & Maintenance personnel and safety committee approval box with approval date.	Page 5
		Revision History Table	Page 6
		Performance Measures - Use Frequency Rates instead of the number of accidents	3.3.5

		Add Fixed Route positions to Key Staff	3.4
		Update Sun Metro / EPSC Organizational Chart	3.4
		Revise section 5.3 regarding an investigation	5.3
		Internal Safety Audit update section Added 2021 Audit Schedule	5.4.1
		Update Section 5.6 Management of Change and the Program	5.6
		Review Training and Certification Plan	6.1.1
		Update the Hazardous Material program to include the fixed route	6.1.3
		Update the Drug & Alcohol Recordkeeping section	6.1.5
		Updated safety bulletin board photo	page 59
Nov 2021	2	Update the LIFT paratransit section, review definitions for FTA compliance, remove OSHA reference for Sun Metro, further define safety meetings, update the organizational chart, update the D&A section to include safety-sensitive positions, update safety performance measures, reference the SMS Executive as an equivalent to the Chief Safety Officer	
Sep 2022	3	Update headers and footers -	
		Update Signature table	Page 5
		Revision History Table	Page 6-8
		Added Acronyms	Pages 12-14
		Added new Upper Eastside Transfer Center	Page 16
		Performance Measures – removed projected	Pages 22-23
		Update Sun Metro / EPSC Organizational Chart	Pages 26-27



Sep 2023	4	Updated and added the SMS Executive Job Duties to the Streetcar Safety Manager	Page 28
		Updated Tittles and added New Fixed Route positions to Key Staff	Pages 33-40
		Updated safety bulletin and added QR Code for Hazard reporting	Page 46
		I added New Bipartisan Infrastructure Law requirements: Risk Reduction Program, Exposure to Infectious Disease, Assault Awareness, and Prevention for Transit Operators.	Pages 67-69
		Updated signature Table	Page 5
		Revision History Table	Pages 8-9
		Corrected Acronyms	Page 14-17
		The organization's information was updated	Pages 18-20
		Sec 2.1 Control and Updates Procedures was updated to coincide with Sec 4.4 of the TxDOT Program Standard, August 2023	Page 20-21
		Updated the Control Documentation notes	Page 23
		Updated the Performance Measures	Pages 27-28
		Updated title for the Managing Director in sec 3.4.1	Page 29
		Updated the Sun Metro and Safety Organizations Charts	Page 30-31
		Sec 3.4.9 Sun Metro Transit Assistant Superintendent of Operations was updated	Page 41-42
Sec 3.4.10 Transit Safety & Security Officer was updated	Page 43		
Drug & Alcohol information for the Sun Metro Lift SMS Program was updated with 49 CRF 655 Federal Regulation	Page 45		
Sec 3.6 Safety Management Policy Communication was updated with more detailed methods of SMP communication	Page 51		



	Sec 4.3.2 Hazard Severity was updated on the frequency of updating OHA's and or PHA's	Page 55
	Sec 5.5.1.4 Cycle/Schedule, sec 5.5.1.5 Checklist and Performance of Safety Audits – updated language to match current practice	Page 67
	Sec 5.5.1.6 Audit Report was updated to coincide with sec 4.7 of the TxDOT Program Standard, August 2023	Page 68
	Sec 5.5.3.3 Assault Awareness and Prevention for Transit Operators was updated to encompass Transit Employees	Page 71-72
	Sec 5.6 Corrective Actions was updated to indicate the SSO tracker vs the name of the software and to address how the RTA will manage the immediate or emergency Corrective Action	Page 72-73
	Sec 7.4 Emergency Drills and Exercises was updated	Page 86-87

DEFINITIONS

1. **Accident** means an Event that involves any of the following:
 - (1) A loss of life;
 - (2) A report of a serious injury to a person;
 - (3) A collision of a public transportation vehicle that results in substantial damage, serious injury, or fatality.
 - (4) A Runaway train;
 - (5) An evacuation for life safety reasons; or
 - (6) Any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
2. **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
3. **Chief Safety Officer** means an adequately trained individual responsible 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 employed by a transit agency that is a small public transportation provider as defined 49 CFR 673.5 or, a public transportation provider that does not operate a rail fixed guideway public transportation system.
4. **Contractor:** An entity that performs tasks on behalf of FTA, a State Safety Oversight Agency, or a Rail Transit Agency, through a contract or other agreement
5. **Corrective Action Plan (CAP):** A plan developed by a Rail Transit Agency that describes the actions the Rail Transit Agency will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Rail Transit Agency to develop and carry out a Corrective Action Plan
6. **Designated personnel** means:
 - (1) Employees and contractors identified by a recipient whose job function is directly responsible for safety oversight of the public transportation system of the public transportation agency; or
 - (2) Employees and contractors of a State Safety Oversight Agency whose job function requires them to conduct safety audits and examinations of the rail fixed guideway public transportation systems subject to the jurisdiction of the agency.
7. **Directly responsible for safety oversight** means public transportation agency personnel whose primary job function includes developing, implementing, and reviewing the agency's safety plan, and/or the SSOA requirements for the rail fixed guideway public transportation system under 49 CFR parts 659 or 674.
8. **Drill:** A supervised activity to test a procedure that is a component of the overall PTASP, Emergency Management Plan, or any other Sun Metro Document. A drill may be a step leading towards an exercise or can also be an actual field response. The true value of a drill lies in its ability to highlight a limited portion of the overall Emergency Management Plan and to examine it closely. (APTA SS-SEM-S-004-09 Rev. 1| General Guidance on Transit Incident Drills and Exercises)

9. **Equivalent Authority** means 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 the sufficient authority to review and approve a recipient or sub-recipient Public Transportation Agency Safety Plan.
10. **Event** means any Accident, Incident, or Occurrence.
11. **Examination** means a process for gathering or analyzing facts or information related to the safety of a public transportation system.
12. **FRA:** The Federal Railroad Administration is an agency within the United States Department of Transportation
13. **FTA** means the Federal Transit Administration.
14. **Hazard** means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
15. **Hazard Analysis:** The method by which hazards are identified and analyzed as to their possible effects on the safe operation of the entire system (i.e.: Failure Mode and Effect Analysis, Fault Tree Analysis, Stress Analysis, etc.)
16. **Hazard Identification:** formal activities to analyze potential consequences of hazards during operations related to provisions of service
17. **Hazardous Condition:** An immediate condition that could cause an accident involving personal injuries or death
18. **Incident** means an event that involves any of the following:
 - (1) A personal injury that is not a serious injury;
 - (2) One or more injuries requiring medical transport; or
 - (3) Damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
19. **Injury:** Any physical damage or harm to persons as a result of an incident that requires immediate medical attention away from the scene
20. **Investigation** means the process of determining the causal and contributing factors of an accident, incident, or hazard, to prevent recurrence and mitigate risk.
21. **Key Staff:** Sun Metro managing positions responsible for the implementation of Sun Metro's Agency Safety Plan.
22. **Mode Safety Manager:** Safety Manager assigned to a specific transportation mode in Sun Metro
23. **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.
24. **NTSB:** National Transportation Safety Board, an independent federal agency
25. **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
26. **Operator of a public transportation system** means a provider of public transportation as defined under 49 U.S.C. 5302(14) *Public transportation agency* means an entity that provides public transportation service as defined in 49 U.S.C. 5302 and that has one or more modes of service not subject to the safety oversight requirements of another Federal agency.

27. **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish and assess progress toward meeting the established targets.
28. **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a period required by the Federal Transit Administration (FTA).
29. **Person:** A passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a rail's fixed guideway public transportation system
30. **Public Transportation Agency Safety Plan (PTASP)** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.
31. **Public Transportation Safety Certification Training Program:** Either the certification training program for Federal and State employees, or other designated personnel, who conduct safety audits and examinations of public transportation systems, and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions in accordance with [49 U.S.C. 5329\(c\)\(2\)](#), or the program authorized by [49 U.S.C. 5329\(c\)\(1\)](#)
32. **Rail fixed guideway public transportation system** means any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration, or any such system in engineering or construction. Rail fixed guideway public transportation systems include but are not limited to rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway.
33. **Rail Transit Agency** means any entity that provides services on a rail fixed guideway public transportation system
34. **Recipient** means a State or local governmental authority or any other operator of a public transportation system receiving financial assistance under 49 U.S.C. Chapter 53.
35. **NTD Reportable Incident:** Existence of one or more of the following:
 - (1) A fatality confirmed within 30 days (including suicide)
 - (2) An injury requiring immediate medical attention away from the scene for one or more persons (partial exception in the case of Other Safety Occurrences Not Otherwise Classified)
 - (3) Estimated property damage equal to or exceeding \$25,000
 - (4) An evacuation due to or under hazardous conditions or to the rail Right-Of-Way
 - (5) Collisions involving transit vehicles that require towing away of a transit roadway vehicle or other non-transit roadway vehicles
 - (6) Rail transit vehicle collisions occurring at a grade crossing
 - (7) Rail transit vehicle collisions with an individual on the rail right-of-way or another revenue or non-revenue rail transit vehicle
 - (8) A mainline or yard derailment of revenue or non-revenue vehicles
 - (9) Security incidents
 - (10) Terrorism-related events
 - (11) Bomb threat (Credible)
 - (12) Bombing (Occurring)
 - (13) Chemical / Biological / Radiological / Nuclear release
 - Other system security events:
 - Arson

- Sabotage
 - Hijacking
 - Cyber-Attack
 - Other personal events:
 - Aggravated assault
 - Rape
 - Suicide
 - Attempted suicide (Survives attempt)
 - Vandalism (See dollar limits)
 - Robbery (See dollar limits)
 - Burglary (See dollar limits)
 - Motor vehicle theft (Proven by Police)
 - Larceny/theft (See dollar limits)
 - Homicide
-
36. **PTSAP** Public Transportation Agency Safety Plan means the comprehensive agency safety plan for a transit agency, including a Rail Transit Agency, that is required by 49 U.S.C. 5329(d) and based on a Safety Management System.
 37. **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.
 38. **Risk Mitigation** means a method or methods to eliminate or reduce the effects of hazards.
 39. **Sabotage**: The deliberate destruction of transit property or the slowing down of public transit operations by employees with the intention of damaging business or the economic condition of the transit agency
 40. **Safety Assurance** means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
 41. **Safety Audit** means a review or analysis of safety records *and related* materials, including, but not limited to, those related to financial accounts.
 42. **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.
 43. **Safety Management System (SMS)** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
 44. **Safety Management System (SMS) Executive** means a Chief Safety Officer or an equivalent. The Safety Management System Executive fulfills the duties of the Chief Safety Officer in accordance with the TxDOT Program Standard and 49 CFR 673. The SMS Executive has the authority and responsibilities of the day-to-day implementation and operation of the agency's SMS and may serve in roles that have a nexus to safety, such as security, asset management, and training (C.F.R. Part 673.5)
 45. **Safety Performance Target** means a Performance Target related to safety management activities.

46. **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.
47. **Safety Risk Assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
48. **Safety Risk Management** means a process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risks.
49. **Serious Injury** means any injury which:
 - (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received;
 - (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses);
 - (3) Causes severe hemorrhages, nerve, muscle, or tendon damage;
 - (4) Involves any internal organ; or
 Involves second or third-degree burns, or any burns affecting more than 5 percent of the body surface.
50. **Small public transportation provider** means a recipient or sub-recipient 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.
51. **SSOC**: Safety & Security Operations Committee
52. **SSP**: System Security Plan.
53. **State of Good Repair** means the condition in which a capital asset can operate at a full level of performance.
54. **State Safety Oversight Agency** means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.
55. **Transit Agency** means an operator of a public transportation system.
56. **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, to provide safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.
57. **Subsystem**: An element of a system that, in itself, may constitute a system
58. **Vehicle**: Any rolling stock used on a rail's fixed guideway public transportation system, including, but not limited to, passenger and maintenance vehicles

Acronyms

AAR	After-Action Reports
ADA	Americans with Disabilities Act
AE	Accountable Executive
ANSI	American National Standards Institute
APTA	American Public Transit Association
AVL	Automatic Vehicle Locator
BRT	Bus Rapid Transit
CAP	Corrective Action Plan(s)
CCR	Configuration Change Request
CDC	Center for Disease Control
CFR	Code of Federal Regulations
COOP	Continuity of Operations Plan
CSO	Chief Safety Officer
CSO	Chief Streetcar Officer
DHS	Department of Homeland Security
DOD	United States Department of Defense
EMA	Emergency Management Agency
EMP	Emergency Management Plan
ERP	Emergency Response Plan
EPSC	El Paso Streetcar
ESRP	Employee Safety Reporting Program
EX	Emergency Exercise
FLSC	Fire Life Safety Committee
FSE	Full-Scale Exercise
FTA	Federal Transit Administration
GPS	Global Positioning Satellite
HSEEP	Homeland Security Exercise and Evaluation Program
ICS	Incident Command System
ID	Identification
ISA	Internal Safety Audit
ITP	Individual Training Program
KPI	Key Performance Indicators
MAP-21	Moving Ahead for Progress in the 21 st Century
MIL-STD	Military Standard
MPO	Metropolitan Planning Organization
MSDS	Material Safety Data Sheets
MSF	Maintenance and Storage Facility
MTI	Manager of Streetcar Infrastructure
N/A	Not Applicable
NFPA	National Fire Protection Association
NIOSH	National Institute for Occupational Safety and Health
NPTSP	National Public Transportation Safety Plan
NSC	National Safety Council
NSP	National Safety Plan <i>also see NPTSP</i>
NTD	National Transit Database

NTI	National Transportation Institute
NTSB	National Transportation Safety Board
O&M	Operation and Maintenance
OCS	Overhead Contact Systems
OEM	Original Equipment Manufacturer
OMP	Operations and Maintenance Plan
OSHA	Occupational Safety and Health Administration
PHA	Preliminary Hazard Analysis
PM	Preventative Maintenance
PMI	Preventative Maintenance Inspection
PMMS	Preventative Maintenance Management System
PPE	Personal Protective Equipment
PRO	Pre-Revenue Operations
PTASP	Public Transportation Agency Safety Plan
PTSCTP	Public Transportation Safety Certification Training Program
QA	Quality Assurance
QC	Quality Control
RFGPTS	Rail Fixed Guideway Public Transportation System
ROW	Right-Of-Way
RTA	Rail Transit Agency
RWP	Roadway Worker Protection
SA	Safety Assurance
SDS	Safety Data Sheet <i>also see MSDS</i>
SGR	State of Good Repair
SIT	System integration testing
SME	Subject Matter Expert
SMS	Safety Management System
SMP	Standard Maintenance Procedures
SOP	Standard Operating Procedures
SPC	Safety Performance Criteria
SPI	Safety Performance Indicators
SPT	Safety Performance Targets
SRA	Safety Risk Analysis
SRCP	Safety Rules Compliance Program
SRL	Safety Risk Log
SRM	Safety Risk Management
SSC	Safety and Security Certification
SSCP	Safety and Security Certification Plan(s)
SSEPP	System Security and Emergency Preparedness Plan
SSO	State Safety Oversight
SSOA	State Safety Oversight Agency
SSPP	System Safety Program Plan
SSPS	State Safety Oversight Program Standard
SSRC	Safety and Security Review Committee
SSWG	Safety and Security Working Group
TAM	Transit Asset Management Plan
TxDOT	Texas Department of Transportation



TPSS	Traction Power Sub Station
TSA	Transportation Security Administration
TSSO	Transit Safety & Security Officer
TTX	Tabletop Exercise
TVA	Threat and Vulnerability Analysis
U.S.C.	United State Code
UC	Unified Command
VRM	Vehicle Revenue Miles
WSO	World Safety Organization

1. Introduction

1.1. Organization

To meet the population growth, Sun Metro offers fixed routes and paratransit - Living Independently Facilitated by Transit (LIFT) services. Sun Metro is one of the largest city departments with 621 employees and an FY 2023 - 2024 annual budget of \$102.5 million. Its fixed route and LIFT bus services are offered within El Paso City limits and one county Route. Its fixed routes and LIFT bus services traveled 10.2 million revenue miles in the pre-pandemic year.

The fixed-route service consists of 53 routes with 151 vehicles transporting passengers. These routes provide about 15 million bus passenger trips a year. The LIFT service consists of 59 LIFT vehicles and 7,000 participants who made 185,593 trips during the fiscal year 2023. Sun Metro operates a large natural gas-fueled fleet, fueled 100% through alternative fuels – CNG, including all passenger support vehicles.

In 2009, the City of El Paso forged an agreement, later revised in 2014, establishing vital transit links for the communities of Socorro, Clint, and San Elizario, Texas. This connectivity is made possible through a dedicated Route operated by Sun Metro. Route 84 culminates the route at Sun Metro's Mission Valley Transit Center, conveniently located at 9065 Montana Ave. Furthermore, residents residing within $\frac{3}{4}$ of a mile of this route are eligible to apply for Sun Metro's paratransit service, ensuring accessible transportation options for a wider range of customers.

Route 84 operates with a total of nine trips on weekdays, eight trips on Saturdays, and no service on Sundays. Presently, the route serves an average of around 100 riders daily. Sun Metro, as the responsible operator, covers all essential aspects, including providing the transit center, skilled drivers, buses, fuel, and necessary maintenance to ensure the route's seamless operation. To sustain this crucial service, Sun Metro collaborates with the County, seeking payment to offset the operational costs.

Route map:

<http://transit.sunmetro.net/route84.html>

Route schedule:

<http://transit.sunmetro.net/documents/pdf/routes/current/route84.pdf>

On November 09, 2018, the El Paso Streetcar began service. The El Paso Streetcar route highlights all the wonderful things that make El Paso downtown and uptown a unique place to visit. The 4.8-mile route runs in two loops through El Paso's uptown and downtown areas. Both loops interconnect through a single-tracked corridor, an international bridge, and an array of businesses, restaurants, government buildings, the Convention Center, the downtown ballpark, and the University of Texas at El Paso among many other prominent locations. As part of this project, six vintage streetcars (the same vehicles that ran on El Paso streets until

1974) were restored for the rigors of daily service. While the streetcars are decades old, they are outfitted with modern amenities including:

- Seating for approximately 35 people and additional space for standing riders
- Free Wi-Fi
- ADA Accessibility
- Bike racks
- Air conditioning
- Heating
- Upgrades for safety
- Modern propulsion
- Streetcar branding along the route and signage at designated stops
- Pavement, sidewalk, and driveway improvements at designated stops, Shelters, and Benches



El Paso Streetcar

The highest transportation priority for both the City and Sun Metro is the implementation of a four-line, citywide BRT/TOD corridor system that connects with other regional and local bus services as well as rail, air, and ground transportation. Corridors include:

- International/Downtown/Central El Paso – serviced by the other four corridors, services the International border area to Glory Road and the University of Texas at El Paso campus.
- Mesa/Westside Corridor – services Northwest El Paso and Southeast New Mexico.
- Alameda/North Loop/Mission Valley Corridor – services Alameda Street and far-Southeast El Paso, connecting to an El Paso County-operated Rural Transit line that provides limited fixed-route service to East Montana and the Mission Valley area incorporated cities.
- Montana Corridor – services East and Far East El Paso to the Upper Eastside Transfer Center located off Edgemere Blvd. and RC Poe Rd.
- Dyer Corridor – services Northeast El Paso and Fort Bliss.



Brio Roadway and TOD Stations

Brio, a Spanish word for excitement, verve, and energy is the term used to describe and brand El Paso's BRT system. In addition to Transit Terminals, each BRT Corridor has several Brio stations that are well-lit and rider-friendly. Amenities include Wi-Fi hotspots; automated Brio status

information boards; and prepaid ticket vending machines.

The stations comply with City, State, and Federal regulations.

Where feasible, public art displays selected or

designed by the City's Museums and Cultural Affairs Department Public Art Division are included either as standalone pieces or as components of improvements throughout each corridor.



all

Sixty-foot Articulated Brio Bus

The 60-foot articulated Brio buses run on CNG fuel with a 400-mile capacity and seven-minute fill-up time. They are well equipped to keep the modern-day rider comfortable and informed of their destination while staying in touch with work, family, and friends, or just enjoying the ride with amenities such as announcement monitors, Wi-Fi, and bike racks.

2. Annual PTASP Review and Update Process

2.1. Control and Update Procedures

Any change or modification to the rail system has the potential to affect passenger and/or employee safety, therefore any change or modification to the rail system will be a reason to review and update the Sun Metro PTASP. Changes to the system in the revenue service period will be conducted in accordance with TxDOT, and Sun Metro policies.

The Sun Metro PTASP will undergo an annual review, starting from a baseline date of October 1st, and is updated periodically on an as-needed basis to include:

- **ASP Annual Reviews:** The PTASP is subject to annual reviews.
- RTA conducts reviews no later than October 1st each year.
- **Notification to TxDOT:** The RTA must inform TxDOT via email whether the ASP is current or requires updates.
- **Detailed Update Notification:** If updates are needed, the email notification must specify the areas requiring modification and provide an estimated completion date.

- **Approval Deadline:** The revised ASP must receive approval from each RTA no later than December 31st.
- **Submission Deadline:** The revised ASP must be submitted to TxDOT no later than January 31st.

These processes ensure the PTASP remains current, accurate, and aligned with the evolving needs and standards of our system.

The following process is used to update and support the Sun Metro PTASP:

- I. The City of El Paso and Sun Metro personnel will work cooperatively with the Chief Safety Officer or SMS Executive, Accountable Executive, and Sun Metro Management to update their safety record and to evaluate the Sun Metro PTASP effectiveness.
- II. The Sun Metro Safety Managers will review the Sun Metro PTASP and advance proposed updates to the Chief Safety Officer or SMS Executive for review and approval.
- III. The Chief Safety Officer or SMS Executive will forward the updated Sun Metro PTASP and the Streetcar section to TxDOT - SSO for their review and comments.
- IV. The TxDOT - SSO will return the Sun Metro PTASP with the Streetcar section with comments to the Chief Safety Officer or SMS Executive:
- V. The TxDOT-SSO comments of Sun Metro PTASP with the Streetcar section will be reviewed by the Accountable Executive, Chief Safety Officer or SMS Executive, Sun Metro Director of Mass Transit, Chief Streetcar Officer & and the Streetcar Safety Manager.
- VI. If TxDOT-SSO has no comments they will submit a letter of approval of the Sun Metro PTASP and the Streetcar section. At that moment, the document will be copied and distributed in accordance with EPSC Sun Metro PTASP and the Streetcar section distribution list.
- VII. The approved plan will be published and distributed to all Sun Metro Managers and pertinent Sun Metro members for implementation according to an established distribution list.

2.2. Implementation Activities and Responsibilities

Sun Metro has defined specific tasks to implement the goals and objectives of the System Safety Program Plan. The personal safety and security of passengers and employees are Sun Metro's highest priorities.

2.3. Annual Sun Metro PTASP Review

Before September 1st of each year, Sun Metro will conduct a review of its PTASP and notify TxDOT via email if the PTASP is current or requires an update. If the RTA determines the PTASP must be updated, the notification shall summarize the areas requiring an update and the anticipated date the revised PTASP will be submitted to TxDOT. The revised PTASP must be approved by each RTA no later than December 31st and submitted to TxDOT no later than January 31st signed by the Director of Mass Transit as the Accountable Executive indicating the Sun Metro PTASP is current and in compliance with the SSO Program Standard (for the streetcar only).

If the Accountable Executive determines the Sun Metro PTASP is not current, the letter shall detail the activities that will be taken to achieve compliance and the internal deadline for submitting the Sun Metro PTASP and supporting materials to TxDOT for approval.

The Chief Safety Officer or SMS Executive is responsible for the preparation, maintenance, and updating of the Sun Metro PTASP. The Sun Metro PTASP evaluation process for Sun Metro will consist of the following steps:

- I. Sun Metro staff will submit an updated/revised version of the Sun Metro PTASP to the Accountable Executive for review.
- II. After approval from the Accountable Executive (AE), the Chief Safety Officer (CSO) or SMS Executive will submit the PTASP to TxDOT.
- III. TxDOT will acknowledge receipt of a Sun Metro PTASP submission.
- IV. If the submission is approved, TxDOT will acknowledge acceptance within 45 days.
- V. If the submission is not approved, TxDOT will notify Sun Metro to request additional documentation or clarification. Upon receipt of the requested documentation or clarification, the process will begin anew.
- VI. If the Sun Metro PTASP does not comply with federal rules or the TxDOT SSO Program Standard for El Paso Streetcar, the CSO / SMS Executive & AE will be notified via a formal letter. A completed checklist identifying the required changes and any required documentation will be included.
- VII. Upon TxDOT's final acceptance, approval will be communicated via a formal letter to the Accountable Executive.

2.3.1. Control of Documents

Sun Metro will follow established processes for the Control and Distribution of Plans, Manuals, Policies, and Procedures. The controls needed for implementation are:

- I. Approve documents for adequacy prior to issue
- II. Review and update as necessary and re-approve documents
- III. Ensure changes and the current revision status of documents are identified
- IV. Ensure current versions of applicable documents are available at points of use
- V. Ensure documents remain legible and readily identifiable
- VI. Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose

Employees and subcontractors shall use the specified or latest revision of specifications or controlled documents to include documents of external origin.

The employees and contractors will be retrained each time the Sun Metro PTASP is updated. In addition, the distribution list of the Sun Metro PTASP will be used to guarantee every party has the latest version of the Sun Metro PTASP.

Each time the Sun Metro PTASP is updated, all personnel included in the Sun Metro PTASP distribution list and subcontractors will be notified via e-mail. This notification will also include the date when they can pick up the updated version.

2.3.2. Control of Records

Records are established and maintained to provide evidence of conformity to requirements and for the effective operation of the quality management system. Records shall remain legible, readily identifiable, and retrievable. Sun Metro Control of Public Records defines the controls needed for the identification, storage, protection, retrieval, retention time, and disposition of records.

The type of document used will vary depending on the type of activity. The following is a list of activities and the type of document used to document it:

Activity	Type of Document
Inspections	Checklist Photos Evidence that the finding has been corrected
Audits	Notification letters Auditing Checklist Auditing report with supportive documentation Corrective Actions generated by the audit
Safety Meetings	Agendas Attendant Sheet
Training	Agenda Attendant sheet Training material

*Official documents must be kept for no less than 3 calendar years.
 This is consistent with the Texas Local Government Schedule.

3. Safety Management Policy Chapter (CFR 673.23)

3.1. Safety Management Policy Overview

All employees and contractors are charged with responsibility for the safety of passengers, employees, property, and those who come in contact with our systems. In addition, ALL employees are accountable for the safety performance of Sun Metro.

Specific accountability for safety performance rests with those responsible for the management of each transit mode operated under Sun Metro.

3.2. Safety Management Policy Section

It is our mission to connect people and places, support economic development, and improve the quality of life in the region. Because of this, Safety is of paramount concern.

All personnel and contractors are charged with responsibility for the safety of passengers, employees, property, and those who come in contact with our systems. Specific accountability for safety rests with those responsible for the management of each function or location. Sun Metro management will review the Safety Program's effectiveness provide resources needed to correct deficiencies and work with the Texas Department of Transportation and other agencies involved in the oversight of safety to achieve the safest and highest quality system possible.

The Chief Safety Officer or SMS Executive is tasked to devise, implement, and administer a comprehensive, integrated, and coordinated Public Transit Agency Safety Plan (PTASP). It is the responsibility of the Chief Safety Officer or SMS Executive and Sun Metro Key Staff to implement and execute SMS to prevent, eliminate, control, and/or reduce hazards of any system under the jurisdiction of Sun Metro. The Chief Safety Officer or SMS Executive will perform, oversee, and/or review all activities related to hazard management. Management of hazards includes the legitimate right, in coordination with the affected department manager, to stop unsafe operations when the hazard identified poses an imminent danger to life and/or property

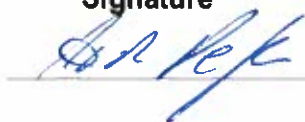
The Chief Safety Officer or SMS Executive will perform, oversee, and/or review all activities related to hazard management. Management of hazards includes the legitimate right, in coordination with the affected department manager, to stop unsafe operations when the hazard identified poses an imminent danger to life and/or property.

It is the Sun Metro & and the City of El Paso's policy to fully support an ongoing Safety Program in which preventive concepts are utilized in identifying and resolving hazards. However, the success of the Safety Program depends on the sincere and cooperative efforts and active participation of all employees. It is, therefore, the responsibility of each Sun Metro employee and Contractor to actively participate in the safety process, provide requested information, and support and aid in any investigations

Approved By

Anthony R. DeKeyzer
(Accountable Executive)

Signature



Date

10/25/23

3.3. Performance Target (based on Nat. Pub. Trans Safety Plan)

Safety performance measurement will help the City of El Paso and Sun Metro monitor their safety performance. The measurement and evaluation of safety performance require a carefully structured program of planning, setting targets, identifying valid measures, conducting proper data analysis, and implementing appropriate follow-up activities. Safety performance measurement is a key aspect of a safety management process and provides the basis for continuous safety improvement.

Pursuant to compliance with 49 U.S.C. § 5329(d), the Sun Metro Agency Safety Plan must include safety performance targets based on the safety performance measures in the FTA National Safety Plan. The safety performance measures are:

1. FATALITIES: Total number of reportable fatalities and rate per total vehicle revenue miles by mode.
2. INJURIES: Total number of reportable injuries and rate per total vehicle revenue miles by mode.
3. SAFETY EVENTS: Total number of reportable events and rate per total vehicle revenue miles by mode.
4. SYSTEM RELIABILITY: Mean distance between major mechanical failures by mode.

Successful performance targets are **specific, measurable, attainable, relevant, and time-bound** (SMART). As part of the annual review of Sun Metro's Agency Safety Plan, Sun Metro shall reevaluate its safety performance measures and determine how the measures should be refined, sub-measures developed, and performance targets selected annually.

If the Safety Targets are not met it will be the responsibility of the City Of El Paso and Sun Metro Management to assess the situation and determine the root cause. Once the root cause has been determined the appropriate Safety Manager in coordination with the CSO will develop the corrective actions needed to mitigate the situation.

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

3.3.1. Fatalities

Fatality is defined as a death occurring at the scene or within 30 days of the accident. It does not include deaths in or on transit property, which result from illness or other natural causes.

3.3.2. Injuries

Injuries are defined as any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene. In addition, FTA has established the term "Serious Injury". A Serious Injury is defined at 49 C.F.R. § 674.7 as any injury that:

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 nose);

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.

For the injury safety performance measure, FTA uses the NTD definition of injury (harm to a person requiring immediate medical attention away from the scene). FTA uses injuries reported on both the NTD S&S-40 (major) and S&S-50 (non-major) forms and excludes injuries resulting from assaults and other crimes (security events). This means Sun Metro may have to report a crime-related injury to the NTD, but Sun Metro would exclude that injury when calculating your injury performance measure.

3.3.3. Safety Events

The Safety Events measure captures all reported safety events that occurred during transit operations and the performance of regular supervisory or maintenance activities. 49 CFR 673.5 defines an Event as any Accident, Incident, or Occurrence.

The 49 CFR 673.5 also defines an **Accident** as an Event that involves any of the following:

- A loss of life;
- A report of a serious injury to a person;
- A collision of a public transportation vehicle resulting in substantial damage, serious injury, or fatality;
- 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.

49 CFR 673.5 defines an **Incident** as 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.

49 CFR 673.5 defines an **Occurrence** as an Event:

- Without any personal injury, any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt in any way the operations of a transit agency.

Safety Events for Fixed Route and Paratransit For the safety event performance measure in these modes, the FTA uses all safety events meeting an NTD major event 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 Sun Metro may have to report a major security event to the NTD but would exclude that security event when calculating your safety events performance measure.

3.3.4. System Reliability

The System Reliability measure expresses the relationship between safety and asset condition. The rate of vehicle failures in service, defined as the mean distance between major

mechanical failures, is measured as revenue miles operated divided by the number of major mechanical failures. This measures how well the fleet or transit vehicles are maintained and operated.

3.3.5. Performance Measures

For this PTASP the data used to develop the performance measures were the data for the Fiscal Year 2021 & 2022. Sun Metro's Performance measures are based on the previous year's data. Data acquisition is discussed in Section 5.3.2 of this document.

All performance measures and PTASP updates will be submitted to TxDOT (for Streetcar) and the MPO no later than September 1st of each year, EPSC will conduct a review of its PTASP and notify TxDOT via email if the PTASP is current or requires an update. If EPSC determines the PTASP must be updated, the notification shall summarize the areas requiring an update and the anticipated date the revised PTASP will be submitted to TxDOT. The revised PTASP must be approved by EPSC no later than December 31st and submitted to TxDOT no later than January 31st as indicated in sec 4.4 of the State Safety Oversight Program Standard dated August 2023.

3.3.6. Sun Metro Performance Table by Mode

<i>Indicators</i>	Mode of Transit Service				
	Para Transit				
	Fiscal Year				
	2020	2021*	2022	2023	2024
<i>Fatalities (Total)</i>	0	0	0	0	0
<i>Fatalities (Rate)</i>	0	0	0	0	0
<i>Injuries (Total)</i>	4	4	0	4	0
<i>Injuries (Rate)</i>	4.95	3.35	0.0	5.36	0
<i>Safety Events (Total)</i>	59	45	55	55	52
<i>Accidents (Total)</i>	17	12	13	16	15
<i>Incidents (Total)</i>	13	19	16	18	16
<i>Occurrences (Total)</i>	28	14	26	21	19
<i>Safety Events (Rate)</i>	0.08	0.06	0.79	0.72	0.73
<i>Accidents (Rate)</i>	1.11	0.06	0.642	0.687	0.65
<i>Incidents (Rate)</i>	1.45	0.95	0.29	0.33	0.30
<i>Occurrences (Rate)</i>	2.39	0.07	1.14	0.90	0.85
<i>System Reliability</i>					

<i>Indicators</i>	Mode of Transit Service				
	Fixed Route				
	Fiscal Year				
	2020	2021*	2022	2023	2024
<i>Fatalities (Total)</i>	0	0	1	0	0
<i>Fatalities (Rate)</i>	0	0	0.02	0	0
<i>Injuries (Total)</i>	41	20	21	24	23
<i>Injuries (Rate)</i>	0.63	0.38	0.40	0.42	0.40
<i>Safety Events (Total)</i>	530	532	624	699	664
<i>Accidents (Total)</i>	139	122	128	136	129
<i>Incidents (Total)</i>	9	23	18	19	18
<i>Occurrences (Total)</i>	97	397	350	388	369
<i>Safety Events (Rate)</i>	2.21	10.16	12.15	12.23	11.62
<i>Accidents (Rate)</i>	2.21	2.33	2.49	2.38	2.25
<i>Incidents (Rate)</i>	0.14	0.43	0.35	0.33	0.31
<i>Occurrences (Rate)</i>	1.54	7.58	6.81	6.79	6.45
<i>System Reliability</i>	82,864	90,000	139,500	238,000	140,000

<i>Indicators</i>	Mode of Transit Service				
	Streetcar				
	Fiscal Year				
	2020	2021*	2022	2023	2024
<i>Fatalities (Total)</i>	0	0	0	0	0
<i>Fatalities (Rate)</i>	0	0	0	0	0
<i>Injuries (Total)</i>	1	0	0	1	2
<i>Injuries (Rate)</i>	0.10	0.00	0.0	0.10	0.20
<i>Safety Events (Total)</i>	9	0	0	11	15
<i>Accidents (Total)</i>	1	0	1	0	2
<i>Incidents (Total)</i>	2	0	2	1	2
<i>Occurrences (Total)</i>	6	0	4	10	13
<i>Safety Events (Rate)</i>	1.08	0.00	2.89	3.61	1.56
<i>Accidents (Rate)</i>	0.10	0.00	0.38	0.00	0.21
<i>Incidents (Rate)</i>	0.19	0.00	0.85	0.22	0.21
<i>Occurrences (Rate)</i>	0.69	0.00	1.66	3.13	1.35
<i>System Reliability</i>	55,330	0	22,880	39,812	95,000

* El Paso Streetcar did not provide revenue service for FY 2021.

3.4. Sun Metro Key Staff - Accountabilities and Responsibilities

The following Key Staff positions are responsible for the implementation of Sun Metro ASP. Sun Metro **has established necessary** authorities, accountabilities, and responsibilities for the development and management of the transit agency's SMS

Key Staff is responsible for implementing the ASP in their individual areas and ensuring that all their personnel understand their individual roles and responsibilities.

3.4.1. Sun Metro Director (Accountable Executive)

Sun Metro's Director of Mass Transit has been designated as the **Accountable Executive** responsible for directing and coordinating all activities affecting safety within Sun Metro. This individual directs and coordinates all operational personnel by establishing and monitoring program and project objectives, The Accountable Executive will oversee the development and implementation of the processes and procedures, review performance, complete required status changes and timekeeping documents, implement and monitor training, coordinate efforts with internal Sun Metro departments The Accountable Executive must satisfy the following functions:

- (1) The Accountable Executive is the final authority over all operations authorized to be conducted on the Sun Metro System.
- (2) Controls the financial resources required for the operations.
- (3) Controls the human resources required for the operations authorized to be conducted.
- (4) Retains ultimate responsibility for the safety performance of the operations conducted.

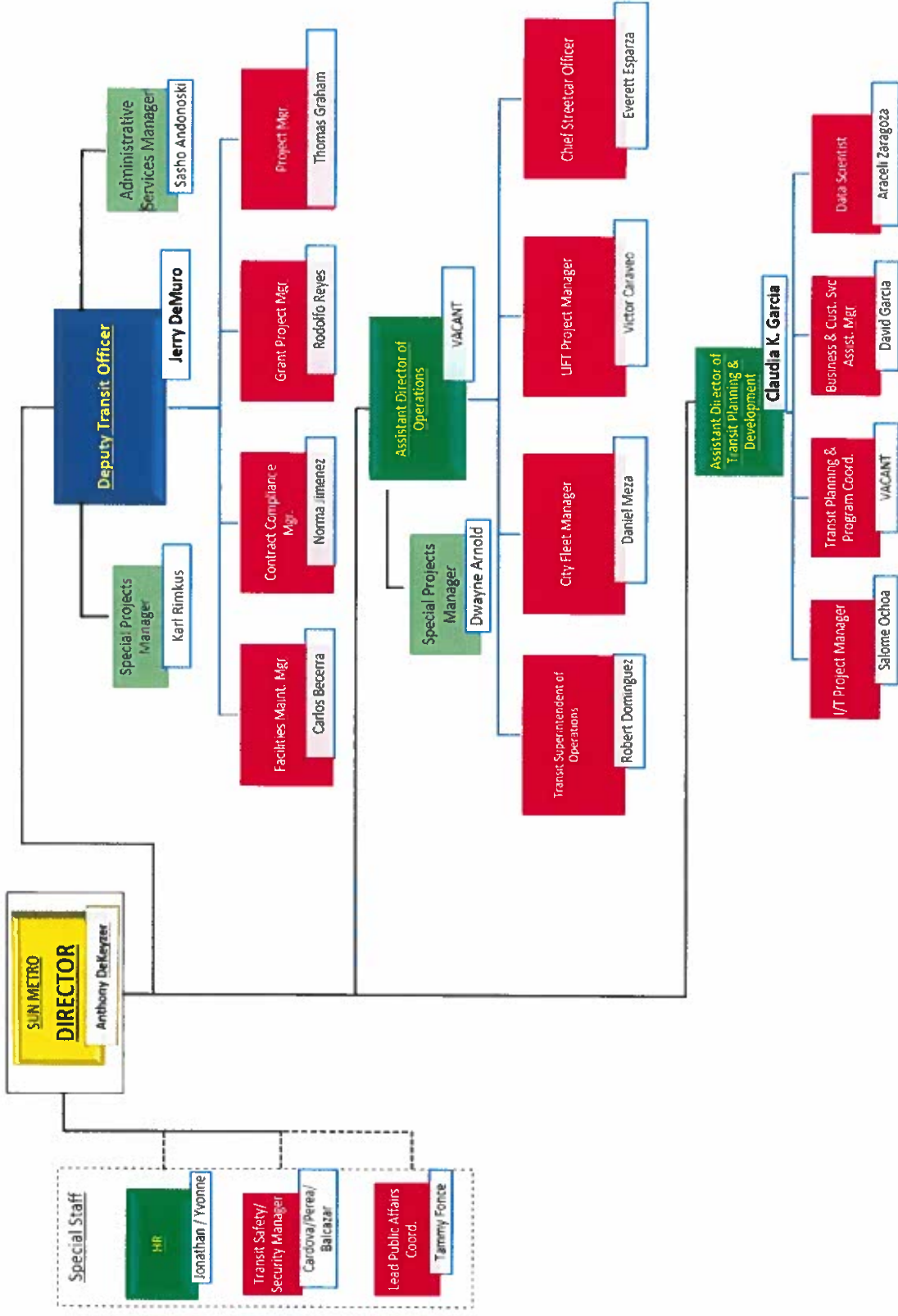
The accountable executive must accomplish the following:

- (1) Ensure SMS is properly implemented and performed in all areas.
- (2) Approved and sign the safety policy.
- (3) Communicate the safety policy throughout the organization.
- (4) Regularly review the safety policy to ensure it remains relevant and
- (5) Regularly review the safety performance of the organization and direct actions necessary to address substandard safety performance

The Director of Mass Transit has full authority to speak and act on behalf of the Authority on all operations and maintenance matters including those involving the safety of passengers, employees, and service property. It is the responsibility of the Managing Director to ensure the organization achieves the system safety goals.

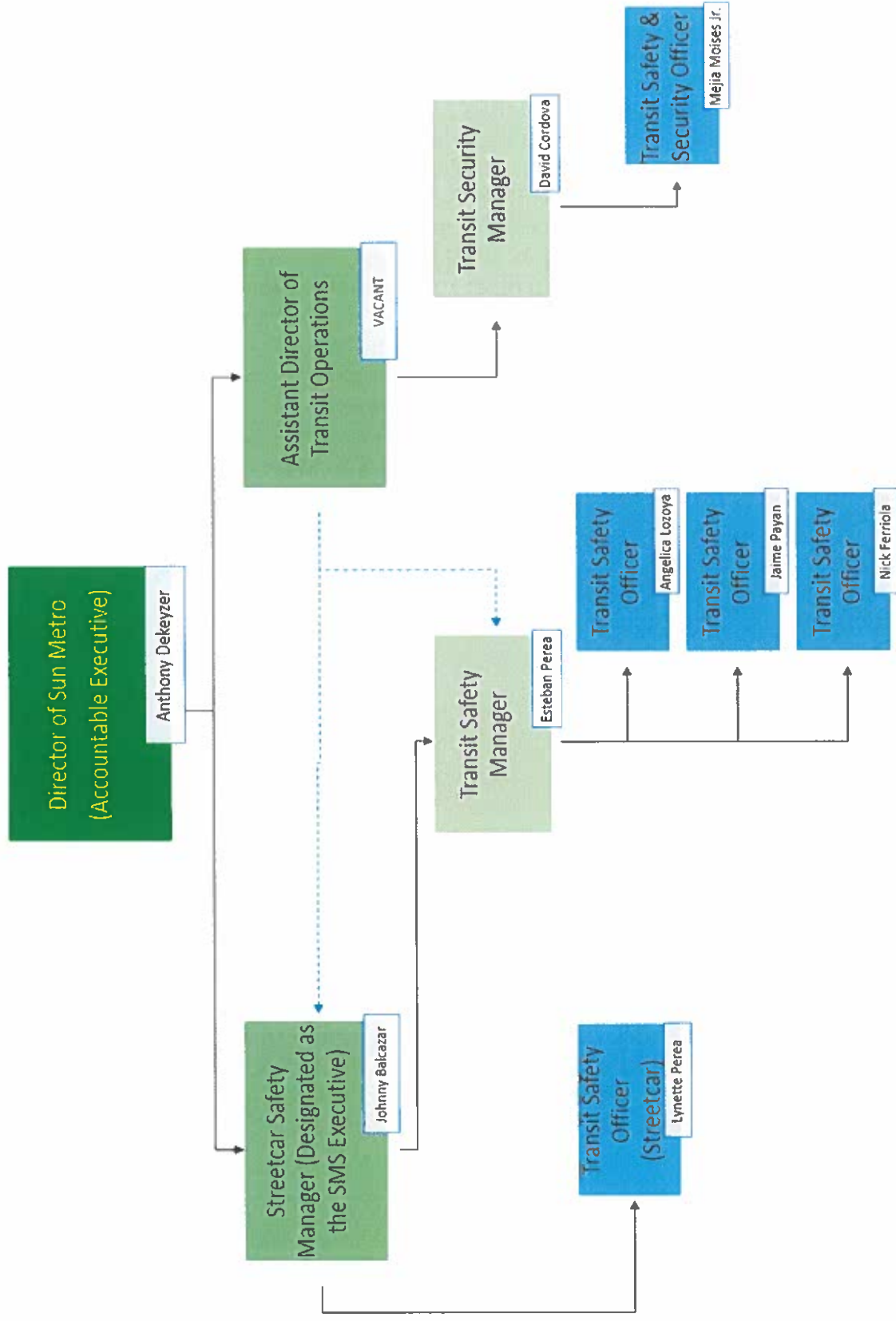
The Director of Mass Transit schedules and attends meetings with the appropriate internal and external staff to exchange information, assess the safety performance of Sun Metro to discuss any safety issues, and is the media contact for Mode-specific safety-related inquiries. The Director of Mass Transit is responsible for the performance of all subordinate staff and for ensuring the entire staff's safety responsibilities are consistently carried out professionally and effectively.

Sun Metro Organizational Chart





Sun Metro Safety Department



3.4.2. Transit Chief Safety Officer (CSO) or SMS Executive

The Transit Chief Safety Officer or SMS Executive is responsible for overseeing (inspecting, auditing, and following up) the implementation of the Sun Metro Agency Safety Plan. With a direct line of communication to the Accountable Executive, this position will be responsible for the development and implementation of the Public Transit Agency Safety Plan as established in 49 CFR 673 and 674. As defined in 49 CFR 673.5 the Chief Safety Officer or SMS Executive is an adequately trained individual responsible for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. The Chief Safety Officer or SMS Executive will not serve in other operational or maintenance capacities.

Typical duties of the Chief Safety Officer or SMS Executive are:

- Directing/overseeing the safety program both on-site and on-road in coordination with Homeland Security, State, and Local Law Enforcement
- Serve as the point of contact between the SSOA and the City of El Paso
- Coordinate the development and implementation of Sun Metro's Agency Safety Plan
- Review and update the Agency Safety Plan under 674
- Monitor hazards reported in Sun Metro through the mechanism discussed in Sun Metro's ASP
- Track reported hazards and how they are being mitigated
- Monitoring the effectiveness of the mitigations already implemented for effectiveness/
- Monitor the different logs listed below
 - I. Hazard
 - II. Corrective Action Plan
 - III. Accident
 - IV. Incident
 - V. Occurrence
 - VI. Unusual
 - VII. Blockage

The CSO must accomplish the following:

- I. Ensure SMS is properly implemented and performed in all areas.
- II. Develop a safety policy.
- III. Communicate the safety policy throughout the organization.
- IV. Regularly review the safety policy to ensure it remains relevant and
- V. Regularly review the safety performance of the organization and direct actions necessary to address substandard safety performance

3.4.3. Streetcar Safety Manager (SSM)

EPSC Safety and Security compliance falls under the responsibility of the Streetcar Safety, (SSM) Manager. The position of Streetcar Safety Manager is designated as the CSO / SMS Executive for Sun Metro. This is to include carrying out duties and tasks that are assigned to the CSO / SMS Executive. The SSM verifies and assesses the daily operations of EPSC. This

position is based at the EPSC Maintenance & Storage Facility (MSF). From this location, the SSM can monitor the safety of the system.

The SSM has the authority to stop any work or operation if it represents an imminent hazard.

The SSM Manager's duties include:

- Assists in accident investigation,
- Performs investigation of security breaches,
- Conducts random inspections,
- Performs annual safety audits,
- Manages hazard analysis,
- Provides safety & security training,
- Conducts threat and vulnerability assessments, and
- Responsible for all System Safety regulatory reporting requirements.
- Ensure SMS is properly implemented and performed in El Paso Streetcar.
- Develop the safety policy for El Paso Streetcar.
- Communicate the safety policy throughout the El Paso Streetcar.
- Regularly review the safety policy to ensure it remains relevant and
- Regularly review the safety performance of El Paso Streetcar and direct actions necessary to address substandard safety performance

The SSM responsibilities in the day-to-day activities may include, but are not limited to:

- Directing/overseeing the overall safety operations of job sites and onboard systems that include reporting and conducting safety meetings.
- Directing/overseeing the development and implementation of training programs (i.e. new streetcar operator, safety policy courses, passenger/assistance service sensitivity classes, etc.)
- Directing/overseeing the security program for all facilities (including on-road), remote surveillance, and onboard camera systems
- Training staff
- Developing and monitoring contents of classroom training to ensure compliance
- Investigate incidents, accidents, hazardous conditions, and work-related injuries including; accident reports, accident files, and accident register, and follow up with the claims office and adjusters as needed
- Planning, scheduling, and conducting monthly safety meetings based on Sun Metro safety and security training goals and objectives
- Setting up regular accident review committees to determine the preventability of accidents
- Addressing employee safety complaints.
- Developing and maintaining the Operational Hazard Analysis Log
- Assisting the Chief Safety Officer or SMS Executive with Corrective Action Plans (CAPs) implementation and follow-up

3.4.4. Transit Safety Manager (Fixed-Route)

The Transit Safety Manager verifies and assesses the daily operations of Sun Metro Bus operations (Fixed Route). This position is based at Sun Metro Transit Operation Center (TOC). From this location, the Transit Safety Manager can monitor the safety of the system. The Transit Safety Manager manages the activities of the division and establishes policies and procedures.

The Transit Safety Manager has the authority to stop any work or operation if it represents an imminent hazard. This position is responsible for:

- Departmental compliance with federal, state, and City safety ordinances, laws, and administration safety policies and procedures.
- Planning and conducting research and preparing technical transit safety research and analysis.
- Evaluating findings, identifying significant issues, determining options, and developing recommendations on complex transit safety projects.
- Evaluating project compliance with safety requirements.
- Managing claim litigation and coordination of accidents and incidents involving transit personnel and/or property. Draft, review, and recommend revisions to departmental insurance policies. Write specifications for insurance quotations.
- Overseeing the cost of insurance, accidents, and claim settlements to initiate cost containment programs and prepare management reports outlining cost reduction strategies.
- Overseeing safety training classes and safety meetings of subordinate personnel.
- Managing environmental compliance activities.
- Overseeing compliance activities related to environmental protection.
- Recommending corrective actions related to environmental protection.
- In coordination with the CSO direct federal safety audits and respond to external agencies' audit findings. Complete and submit safety reports to regulatory agencies.
- With the support of the CSO, serve as a liaison with federal, state, and city agencies and departments.
- Perform preliminary assessments such as identifying environmental conditions.
- Overseeing and coordinating environmental assessments performed by outside consultants.
- Reviewing environmental impact statements completed by consultants. Evaluate project compliance with environmental requirements.
- Represent the City at various meetings, conferences, and formal proceedings and interact with a wide range of officials, regulatory agencies, civic and professional organizations, the media, department directors, coworkers, and the public.
- Testifying in formal proceedings regarding insurance-related matters, subrogation, litigation, and accident/injury investigation.
- Conducting presentations pertaining to the status of operational plans to elected officials, steering and policy advisory committees, civic and business groups, and the public.
- Serving as a technical adviser to contractors and City officials.
- Advising higher-level supervisors in a timely manner of situations or issues that have or could lead to deviation from expected results, and recommending appropriate solutions or options.

- Performing division general and fiscal administration and miscellaneous professional and managerial functions as required.
- Involves:
 - Participate in setting performance goals and priorities that contribute to the departmental mission.
 - Monitor and approve an allocation of operational expenses for the area of responsibility.
 - With the support of the CSO/SMS Executive, prepare recommendations, and justify division programs and capital funding to assist in the preparation of the department's budget and control expenditures.
 - Plan, develop, implement, and administer components of the information system to establish and maintain timely and accurate reporting and recording pertaining to functions managed.
 - Perform duties of a higher-level supervisor, peers, or subordinates to ensure continuity of operations.
 - Ride transit vehicles as a passenger periodically to observe operations. Oversee preparation of activity reports.
- Supervising assigned personnel.
- Scheduling, assigning, and checking work.
- Conducting employee performance appraisals and review evaluations by subordinate supervisors.
- Provide training and development.
- Enforcing personnel rules and regulations and work behavior standards firmly and impartially.
- Meeting with staff on a regularly scheduled basis.
- Counseling, motivating staff, and maintaining harmony.
- Interviewing applicants.
- Recommending hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.5 Sun Metro Assistant Director of Transit Operations

Sun Metro Assistant Director of Transit Operations, please refer to the Sun Metro Organizational chart.

Typical Duties are:

- Plan, organize, and oversee daily operational activities. Involves:
 1. Manage the division to include fixed routes, rapid transit (BRIO), and dispatch operations.
 2. Participate in the development and implementation of transit operations policies, goals, and standards to provide safe, reliable, cost-effective, and customer-friendly bus service.
 3. Direct all aspects of transit operations, including ridership, on-time performance, quality of service, and fare collection.

4. Make recommendations and resolve sensitive and controversial operations issues including customer complaints when necessary.
 5. Coordinate with other department divisions to ensure appropriate resources are available for all operations.
Prepare correspondence regarding department operations, policies, and procedures.
- Direct administrative and procedural studies of transit operations and maintenance to review cost-effectiveness and recommend service improvements. Involves:
 1. Research and analyze operational statistics. Prepare divisional budgets, and monitor and control budgets.
 2. Direct operational programs such as Training and Development and Expansion of Service Methods and Area.
 3. Oversee the Transit Facility and Fleet Maintenance program to include fueling and inventory control methods.
 4. Provide technical expertise in support of vehicle acquisitions including specification preparation.
 5. Maintain awareness of current Federal Transit Administration (FTA) regulations and federal, state, and local legislation pertaining to transit operations, including drug and alcohol testing regulations, and accessibility requirements.
 6. Adjust procedures as necessary to maintain compliance.
 7. Participate in audits or federal grant regulatory compliance and development of cost allocation plans.
 8. Substitute for department head and other division heads during absences, if delegated, to maintain continuity of services and operations. Represent the department at committee meetings such as the Citizen Advisory Committee and Mass Transit Board, communicate with ridership, the media, and citizen groups, and while at transit industry events.
 - Oversee and manage fixed-route transit service and systems planning, scheduling, data collection, and service analysis activities. Involves:
 1. Develop operational service planning studies.
 2. Analyze performance data and key performance indicators.
 3. Coordinate programs related to bus stops, shelters, and transit centers. Identify transit service needs, prioritize improvements, and determine resources required for implementing modified or new service(s).
 4. Oversee analysis and scheduling of major service changes and communicate changes to the affected public.
 5. Oversee route shift-bidding process.
 6. Oversee management of system performance measurement, route evaluation, and bus stop inventory database.
 7. Evaluate trip planning, ridership, route efficiency, and accessibility.
 8. Oversee the retrieval of manual and automated passenger counts and on-time performance data, so it may be reported to the Federal Transit Administration (FTA).

9. Coordinate with the Fixed Route Operation division and other departmental staff to implement service delivery plans and other programs such as the Automated Vehicle Locator (AVL).
 10. Coordinate service for general and special event operations that include Fixed Route and Streetcar Operations.
 11. Analyze and evaluate division operations to assess long and short-range transit planning for strategies, resources, and needs.
 12. Coordinate with other city departments and entities such as the Texas Department of Transportation (TXDOT), and Metropolitan Planning Organization (MPO) on long-range or regional transit planning and development projects.
- Supervise assigned staff. Involves:
 1. Schedule, assign, instruct, guide, and check work.
 2. Appraise employee performance and review performance appraisals completed by subordinate supervisors.
 3. Provide training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, discipline, merit pay, or other employee status changes.

3.4.6 Chief Streetcar Officer

The Chief Streetcar Officer **Monitors and Oversees** the management of Sun Metro's Streetcar system. As a Sun Metro employee, this managerial position reports to the Director of Mass Transit. The position directs and manages all staff and contractors to ensure compliance with established Sun Metro's system policies, directives, regulations, and ordinances (city, state, and federal) and both the Standard Operating Procedures (SOP) and Standard Maintenance Procedures (SMP) in all phases of operation and maintenance. Under general direction, oversee, direct, and manage streetcar operations and streetcar maintenance and facility functions.

Among the duties are:

- Plan and organize the development of streetcar operations. Involves: Analyze and evaluate division operations to assess the Streetcar program and project objectives to determine strategies, resources, and needs.
- Develop short and long-range plans. Involves: Monitor trends, establish benchmarks, and implement modifications and improvements. Ensure compliance with all federal, state, local, and agency requirements set forth by the Federal Transit Administration (FTA).
- Establish goals and performance objectives for staff availability and performance. Involves: Maintain reliable and high-quality streetcar service by ensuring appropriate scheduling of personnel and training. Monitor ridership trends and analyze data. Recommend and monitor completion of service upgrades and modifications, monitor workflow, and monitor expenditures.

- Direct and control the streetcar maintenance and facility and oversee streetcar maintenance and repair of rail equipment including vehicles, track, and stations. Oversee inventory control methods. Ensure compliance with equipment manufacturer specifications, coordinate operational requirements with maintenance staff, and report equipment failures.
- Participate in new operational design, coordinate activities internally with outside vendors and contractors, and manage and participate in configuration control programs. Prepare, monitor, and control divisional budget.
- Supervise assigned professional, supervisory, and administrative support personnel. Involves: Schedule, assign, instruct, guide, and check work. Appraise employee performance and review evaluations by subordinates.
- Provide for training and development; enforce personnel rules and regulations, and work behavior standards firmly and impartially. Counsel, motivate, and maintain harmony. Interview applicants. Recommend hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.7 Streetcar Superintendent of Operations

The Streetcar Superintendent of Operations position is located at the MSF facility. This position oversees and manages the streetcar revenue operations. The tasks that are to be carried out by the SSO are listed but are not limited to below:

- Assists in planning, organizing, coordinating, and directing streetcar operations through subordinate supervisors to ensure timely, efficient, and safe customer service. Involves:
 1. Provide guidance and direction to subordinate supervisors in route and shift coverage to ensure timeliness of service, customer satisfaction, and compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements. Monitor daily operations, meet with route supervisors on service-related issues such as road closures or special assignments, and maintain and analyze complaint files for service improvement.
 2. Issue written or oral instructions to transit supervisors and dispatchers. Monitor overtime and other operating expenses.
 3. Oversee and monitor the streetcar to ensure sufficient staffing to facilitate the orderly movement of passengers.
- Investigate and respond to complaints from public officials, other departments, or the general public. Involves:
 1. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate. Ensure that accidents or complaints are properly investigated.
 2. Represent the City in administrative hearings. Interact with other departments, supervisors, co-workers, and the public.
- Supervise assigned personnel. Involves:

1. Assign, schedule, and monitor work.
 2. Appraise employee performance and review subordinates' appraisals.
 3. Provide training and development.
 4. Counsel, motivate, and maintain supervisor-subordinate harmony.
 5. Identify and resolve staff differences, conflicts, and deficiencies. Investigate grievances, take statements, and make recommendations. Interview applicants.
 6. Recommend hiring, discipline, termination, merit pay, or other employee status changes.
 7. Enforce personnel rules and regulations, and work behavior standards firmly and impartially.
 8. Monitor and ensure equitable distribution of overtime.
 9. Promote the observation of safe work practices.
 10. Monitor sick leave abuse, and oversee vacation sign-up.
- Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of immediate supervisor or subordinates to ensure continuity of operations.
 2. Respond to serious accidents or emergencies to ensure proper investigation.
 3. Attend meetings to represent the department, such as the Sun Metro's Citizens' Advisory Committee, or Workers' Compensation hearings.
 - Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Provide for training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, termination, transfers, discipline, and merit pay or other employee status changes.

3.4.8 Transit Superintendent of Fixed Route Operations

The Transit Superintendent of Operations position is located at the TOC facility. This position oversees and manages the fixed-route operations. The tasks that are to be carried out by the TSO are listed but are not limited to below:

- Assists in planning, organizing, coordinating, and directing transit fixed route operations through subordinate supervisors to ensure timely, efficient, and safe customer service. Involves:

1. Provide guidance and direction to subordinate supervisors in route and shift coverage to ensure timeliness of service, customer satisfaction, and compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements. Monitor daily operations, meet with route supervisors on service-related issues such as road closures or special assignments, and maintain and analyze complaint files for service improvement.
 2. Issue written or oral instructions to transit supervisors and dispatchers. Monitor overtime and other operating expenses.
 3. Oversee and monitor fixed routes to ensure sufficient staffing to facilitate the orderly movement of passengers.
- Investigate and respond to complaints from public officials, other departments, or the general public. Involves:
 1. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate. Ensure that accidents or complaints are properly investigated.
 2. Represent the City in administrative hearings. Interact with other departments, supervisors, co-workers, and the public.

 - Supervise assigned personnel. Involves:
 1. Assign, schedule, and monitor work.
 2. Appraise employee performance and review subordinates' appraisals.
 3. Provide training and development.
 4. Counsel, motivate, and maintain supervisor-subordinate harmony.
 5. Identify and resolve staff differences, conflicts, and deficiencies. Investigate grievances, take statements, and make recommendations. Interview applicants.
 6. Recommend hiring, discipline, termination, merit pay, or other employee status changes.
 7. Enforce personnel rules and regulations, and work behavior standards firmly and impartially.
 8. Monitor and ensure equitable distribution of overtime.
 9. Promote the observation of safe work practices.
 10. Monitor sick leave abuse, and oversee vacation sign-up.

 - Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of immediate supervisor or subordinates to ensure continuity of operations.
 2. Respond to serious accidents or emergencies to ensure proper investigation.
 3. Attend meetings to represent the department, such as the Sun Metro's Citizens' Advisory Committee, or Workers' Compensation hearings.

- Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Provide for training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially.
 5. Counsel, motivate, and maintain harmony. Interview applicants.
 6. Recommend hiring, termination, transfers, discipline, and merit pay or other employee status changes.

3.4.9 Sun Metro Transit Assistant Superintendent of Operations

Sun Metro has two Transit Assistant Superintendent of Operations positions that are located at the TOC facility. These positions oversee and manage the fixed-route operations. The tasks that are to be carried out by the TASO are listed but are not limited to below:

- Plan, organize, and supervise the daily transit operations through subordinate employees. Involves:
 1. Monitor daily operations and provide guidance and direction to transit operators, communication dispatchers, and transit supervisors to provide superior transit service and ensure timeliness and customer satisfaction.
 2. Promote and implement compliance with safety requirements set forth by Federal Transit Administration (FTA) regulations and motor carrier requirements.
 3. Meet with transit operators, communication dispatchers, and transit supervisors daily to identify and resolve problems and allocate supervisor and dispatcher assignments. Assist with personnel-related issues such as sick leave abuse notifications, miss-outs, and issuance of written or oral instructions to transit operators, dispatchers, and transit supervisors.
 4. Evaluate and ensure compliance with safety and training requirements.
- Oversee and participate in compliance activities related to transit operations.
 1. Coordinate training and maintain records.
 2. Coordinate the transport of safety-sensitive operations employees to random drug testing sites.
 3. Monitor overtime and other operating expenses related to transit operations.
 4. Maintain statistics and generate periodic reports on services furnished.
 5. Monitor calls received and follow up with transit operator complaints or issues regarding service or units.
 6. Ensure that accidents, unsafe acts, and complaints are properly documented and reported.

7. Monitor staffing levels and shift assignments for transit operators, dispatchers, and transit supervisors.
 8. Recommend service modifications to better accommodate customer needs.
 9. Review documentation submitted by Transit Operators, Dispatchers, and Transit Supervisors for accuracy prior to submission to the Superintendent or other divisions.
- Perform and conduct various administrative responsibilities. Involves:
 1. Identify, create, and introduce improvements to workflow, training, equipment, and other operational areas.
 2. Respond to inquiries, questions, and requests for information.
 3. Draft and provide written and oral responses.
 4. Consult with department planning and scheduling staff on the transit operator sign-up.
 5. Coordinate and execute the transit supervisor and dispatcher sign-up, transit supervisor and dispatcher coverage, transit operator vacation sign-up, transit supervisor vacation sign-up, transitional duty assignments, and other special projects.
 6. Assist the safety division in the planning and preparation of new transit operator trainee classes and transit operator trainer assignments.
 7. Assist the Superintendent in resolving problems and responding to customer service complaints, including complaints from individuals who may be irate.
 8. Attend meetings as required to provide information and respond to concerns from co-workers, other departments, and the public.
 9. Make recommendations for improvement of services.
 - Perform related managerial or supervisory duties as required. Involves:
 1. Perform duties of immediate supervisor or subordinates to ensure continuity of operations.
 2. Recall employees to work in emergencies.
 3. Assist the Superintendent with the solution of grievances.
 4. Promote the observation of safe work practices.
 - Supervise assigned personnel. Involves:
 1. Schedule, assign, and check work.
 2. Appraise employee performance and review evaluations by subordinate supervisors.
 3. Training and development.
 4. Enforce personnel rules and regulations and work behavior standards firmly and impartially. Counsel, motivate, and maintain harmony.
 5. Interview applicants, hiring, termination, transfers, discipline, merit pay, or other employee status changes.

3.4.10 Transit Safety & Security Officer

Sun Metro has five Transit Safety and Security Officers who are assigned to the Safety Division. Four report to the Transit Safety Manager, and one reports to the Streetcar Safety Manager. The TSSO's duties include but are not limited to the following:

1. Plan, organize, coordinate, and oversee transit-related risk management programs including quality assurance issues or projects, worker's compensation, and safety programs.
2. Involves: Develop and implement policies, procedures, and internal controls related to compliance with health, safety, security, and environmental rules and regulations. Identify health and safety risks and recommend corrective actions to control and limit the City's liability.
3. Investigate claims of damage or injury reported by passengers, pedestrians, or other drivers.
4. Coordinate legal issues or concerns with the City Attorney's office, liability insurance adjusters, or external legal counsel and represent the City's interest in mediation, settlement negotiations, or trials.
5. Coordinate quality assurance inspections such as post-accident, and post-employee injury inspections and monitoring.
6. Oversee and participate in compliance activities related to environmental protection such as alternative fuels, stormwater, and fuel storage, and coordinate corrective action or response to audit findings.
7. Assist the Transit Safety Manager with coordination of the federally mandated drug and alcohol testing program including pre-employment, post-accident, reasonable suspicion, random, return to duty, and follow-up testing for safety-sensitive positions.
8. Assist with federal safety audits and complete and submit safety reports to regulatory agencies.
9. Plan, coordinate, and deliver training programs. Involves: Conduct needs assessment, program planning, development, and presentation of training and instructional materials. Monitor program effectiveness, track attendance, and prepare periodic reports. Prepare, edit, and coordinate the production of training materials or coordinate the efforts of contractual trainers.
10. Provide classroom and behind-the-wheel or pedal time training to new Transit Operators and provide retraining to current Transit Operators.
11. Provide training in areas such as defensive driving, back injury prevention, commercial driver licensing, supervisory training, hazardous materials, accessibility compliance, sexual harassment prevention, or other subjects related to transit operations to enhance performance or ensure compliance with state and federal requirements.
12. Respond to complaints from public officials, other departments, or the general public.
13. Provide accurate information to inquiries, and respond to complaints, including complaints from individuals who may be irate.
14. Ensure that accidents, unsafe acts, and complaints are properly investigated. Conduct on-the-scene accident investigations. Interact with other departments, supervisors, co-workers, and the public.
15. Coordinate and participate in department Event Review Board (ARB) committee meetings.

3.4.11 Sun Metro LIFT

Since 2012, Sun Metro has outsourced the paratransit division to MV Transportation, a national third-party vendor. After the initial agreement ended in 2019, MV was awarded a new 10-year contract through a competitive RFP process. The new contract states that MV is responsible for providing all staffing resources to run a turn-key operation while the City provides the operations and maintenance facility, fuel, scheduling software, and buses. The service is paid for by performed trip and a fixed monthly fee while maintaining a set of key performance measures with corresponding incentives and disincentives. MV is then responsible for the following:

- Deliver a fully functional ADA paratransit operation as outlined in the 2019-607R contract.
- The hiring of all necessary personnel includes drivers, supervisors, dispatchers, schedulers, call center staff, mechanics, and supervisors.
- The maintenance of the facility, buses, equipment, landscaping, and bus wash.
- All operational expenses include utilities, uniforms, LIFT passenger flyers and correspondence, vehicle cellular charges, and all costs associated with running the service.
- Create, execute, and maintain a fully functional eligibility program that includes a new conditional eligibility component.
- Management of all subcontractors to ensure delivery of the highest quality and lowest cost paratransit service and that they meet all FTA and City requirements.
- Implementation of their Safety SMS program that adheres to all FTA requirements. Sun Metro does not have its SMS program for paratransit; instead, it relies on MV's safety program, namely their "

In addition to providing MV with the facility, buses, fuel, and technology, the City will also provide a contract compliance manager who regularly reviews the performance measures and other contractual obligations. The following are the main contractual obligations and key performance measures: **Sun Metro Standards**

Standard	Disincentive	Expected	Incentive
In-Window On-Time	<90.0%	90-92.9%	>93%
Ride-Time Compliance*	<97%	97-98.9%	>99%
Call Center Response Time * (Calls answered within 2 mins)	<90%	90-92.9%	>93%
Complaints per 10K trips *	>=13	10-12.9	<10
Customer Satisfaction Rating*	<4.0	4.0-4.5	>4.5
Miles between Road Calls	<75K	75K-90K	>90K
Preventative Maintenance	<98%	99-99.9%	100%
Safety (Collisions)	>1.3	1.0-1.3	<1.0
Passenger Incidents/10K trips*	>1.0	.6 - .9	<.6

Sun Metro LIFT Safety SMS Program

MV provides a Safety and Operations Manager who manages the paratransit safety program in compliance with State and Federal regulations and Corporate and Client policies. This position ensures:

- All operators are current with company and contractor training requirements.
- All operators are adequately certified, and certification records and files are kept up to date.
- All employees are current with the training required for general safety programs and practices.
- The local facility is operated in compliance with OSHA and EPA regulations.
- All new hire candidates meet minimum general qualifications and receive all required training prior to being placed into revenue service.
- Liability and Worker's Compensation Claims are handled appropriately, promptly, and in conjunction with contractor staff and resources.
- The Drug and Alcohol Testing program is implemented and complies with Federal and TxDOT regulations as specified in 49 CFR Part 655.
- Employee turnover is minimized through initial and ongoing training aimed at improving operator skill levels as well as through a complete and appropriate screening process.
- Consistent reductions in preventable and non-preventable vehicle and non-vehicle accidents.
- Dynamic and appropriate ongoing training programs for all operators.
- Safety Incentives and programs are managed effectively and consistently. A consistent Safety Culture throughout the location incorporates operations, safety, and maintenance departments and emphasizes the team approach and individual responsibility of all employees to achieve the common goal.
- Successful completion of all related audits including those conducted by MV, City, FTA, or external auditors.
- Recruit and screen potential new hire operator candidates to be placed into training ensuring that efforts meet the staffing needs of the project.
- New hire and veteran operator training programs are managed to ensure all operators receive the minimum initial training and all employees receive required annual and ongoing training.
- Community outreach is implemented to identify potential new hire candidates as well as the most appropriate recruiting sources.
- Provide and/or manage the classroom and behind-the-wheel instruction in all aspects of vehicle operation in the course of passenger transportation, including defensive driving, service area familiarization, passenger loading, unloading and securement, proper manifest documentation, use of on-board equipment, accident and emergency procedures, dispatch and radio communications, and passenger sensitivity.
- Provide and/or manage monthly or annual ongoing/refresher training in topics relevant to the service and service area in a timely manner.
- Respond to and/or provide for trained staff response to operator accidents and incidents, ensuring appropriate collection of information, documentation of events, and reporting per MV's internal policy. Review all vehicular, passenger, and employee accidents/incidents for

determination of cause and preventability, identifying potential trends to be addressed in future training efforts as well as ensuring retraining and safety points are assessed according to MV's policy.

- Manage all aspects of the Drug and Alcohol Testing program including pre-employment, random, and post-accident testing requirements. Conduct regular reviews of local testing facilities ensuring compliance with City, MV corporate, and federal policy.
- Establish functional Safety Committees of operators and staff to review safety concerns and make recommendations to management for potential additional safety efforts.
- Assist operations and maintenance departments in identifying additional or refresher training needs based on current trends within the employee base
Work with City & MV corporate claims staff to ensure all liability and worker's compensation claims are handled promptly and effectively in an effort to reduce financial liability as well as recoup all claims, that can be subrogated.
- Proactively manage all employee injury claims to minimize lost time and modified duty claims. Work with local medical facilities to ensure injured employees are returned to full-duty status promptly.
- Conduct regular audits of employee training files, vehicle maintenance files, and facility safety audits ensuring compliance with OSHA and EPA regulations and related MV corporate policies.
- Ensure operator performance reviews, ride-along, road checks, and evaluations are conducted according to local policies and MV corporate policy and requirements. Provide feedback and follow-up for operator performance reviews and identify individual training needs where necessary.
- Ensure all project training materials are current, necessary supplies are available and inventories are secured and kept up to date.
- Provide regular reports to local and MV corporate management staff of safety department efforts, claims status, training efforts, accident history, worker's compensation claims status, and other required information.

3.5 Employee Safety Reporting

Safety reporting is an essential part of SMS. Sun Metro must foster an atmosphere of trust that encourages and rewards employees for providing safety-essential information to Senior Management, even if it is self-incriminating, without fear of reprisal. Reports and concerns are communicated to management & Senior Management, so they are assessed and mitigated. If required, the hazard or concern could be elevated to upper management for additional actions.

As we know self-reporting is a process that if what happened was a real mistake, the focus will be on re-education and not on the punitive action.

There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the Transit Master Operation Incident Report.
- Report conditions anonymously via a locked comment box in the driver area.

- Report conditions using their name or anonymously to hazard@elpasotexas.gov
- Report conditions directly to any supervisor, manager, or director.

CSO discusses actions taken to address reported safety conditions during the quarterly SSRC Meetings. Additionally, if the reporting employee provided his or her name during the reporting process, the CSO or designee follows up directly with the employee when Sun Metro determines whether or not to take any action, and after any mitigations are implemented

Hazards reported by employees are informed to the CSO and the Mode Safety Manager. The Mode Safety Manager is responsible for directly addressing the reported hazard. The CSO will provide support and track the management of the reported hazard. The CSO will report to upper management on how the hazards reported are managed.

An effective SMS empowers employees with the confidence to raise concerns that may lead to serious safety/quality concerns and assures them that someone will listen to them and investigate their issues or concerns in a professional manner — all without fear they will face unduly harsh penalties for admitting to genuine mistakes.

A robust employee safety reporting system will provide:

- Unique – Information you can’t get any other way
- Authentic – Individuals who know best are directly providing the information
- Timely – Direct reporting overcomes the time lag of mandatory reporting processes
- Diverse Information from different individuals with different experiences and perspectives
- Comprehensive – Multiple reports over time reveal patterns, trends, and the scope of an issue

The Sun Metro will implement an Employee Self Reporting program that will:

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

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

Human Error	At-Risk Behavior	Reckless Behavior
An inadvertent action – slip, lapse, mistake	A choice – risk not recognized or believed justified	Conscious disregard of unreasonable risk
Manage through: <ul style="list-style-type: none"> ➢ Processes & procedures ➢ Checklists ➢ Training ➢ Design 	Manage through: <ul style="list-style-type: none"> ➢ Increase situational awareness ➢ Remove at-risk behavior ➢ Encourage safe behavior 	Manage through <ul style="list-style-type: none"> ➢ Remedial action ➢ Punitive action

Employees are expected to tell others when witnessing unsafe work practices or conditions. When employees are not comfortable discussing these unsafe conditions with fellow employees, they are encouraged to discuss the situation with management or report it in writing.

What is important to emphasize is that any cultural change in the organization will take time (months to years) to be fully implemented and see the results of these changes.

3.5.7 Disciplinary policy

To ensure a culture of open reporting in Sun Metro, in the majority of the cases, no disciplinary action will be taken against any employee who **reports** a safety hazard or concern using the proper channels provided by Sun Metro and the City of El Paso. If the reporting of the hazard or concern indicates, beyond any reasonable doubt an illegal act, gross negligence, or a deliberate/willful disregard for Sun Metro or City of El Paso rules and regulations, the employee will be subject to disciplinary actions.

The Sun Metro Rules and Regulation Manual will serve as the guidelines for the implementation of disciplinary actions regarding Events. The Human Resources Department of Sun Metro will be responsible for interpreting and determining any disciplinary action if necessary.

3.5.8 Employee Reporting Methods

If a Sun Metro employee is involved in a near miss or determines something they deem to be a hazard, Sun Metro and their contractors ask for their help in reporting the event so we all may learn the lessons from it and perhaps prevent a collision or injury from occurring in the future.

- Near miss: An event you witnessed where no harm was caused, but there was the potential to cause injury or ill health; a dangerous occurrence.
- Hazard: Anything that may cause harm in the near future.

If an employee is involved in a near miss or determines something they deem to be a hazard, we ask for their help in reporting the event so we all may learn the lessons from it and perhaps prevent a collision or injury from occurring in the future

If the safety or security hazard requires immediate attention, dispatch is notified immediately. If immediate attention is not required, the employee is encouraged to submit the information to management by the end of their workday. Our managers then initiate conversations with employees about their observations of both safe and unsafe behaviors.

The employee's contribution to the cause of the injury or collision is considered in disciplinary action, up to and including termination. If after analysis it has been determined the incident resulted from an overt decision, disciplinary action is indicated. If not, then the appropriate counseling and/or training is indicated.

The following methods will be used by Sun Metro to allow employees to report hazards or near misses. The methods are:

1. **Reporting boxes:** Using a Near/Hazard Notification form, the employee can fill out the form and deposit it in the reporting boxes that will be located at strategic locations on Sun Metro facilities. The locations will be selected in a way that the employees feel comfortable using this method. Each mode will develop a Standard Operating Procedure.
2. **Open-door policy:** Each safety manager, CSO/SMS Executive, and Accountable Executive have an open-door policy where the employee is encouraged to contact their corresponding manager to report any hazard or safety situation in their work area.

Refer to section 6.2 Safety Communication for more details on Sun Metro's Communication process.

3. Hazard Reporting QR Code



Safety Reporting Options:

- Notify your Supervisor/Lead or local
- Safety Representative
- Email sm-hazards@elpasotexas.gov
- Formally submit a confidential report

Safety Management System (SMS)

What Is my role In our SMS?

- Work safety and wear PPE
- Be compliant with procedures and regulations
- Report safety hazards, concerns, or suggestions

What can I report?

- Hazards or potential hazards
- Accident and/or Incidents
- Possible solutions and safety improvements
- Close calls and/or near misses

Personal Safety Accountabilities:

- I am accountable for my own safety and file safety of those around me
- I follow procedures, wear PPE, and promptly report safety hazards
- I must report injuries and damages
- My goal: **BE SAFE AT WORK AND AT HOME**

Unacceptable Workplace Behaviors:

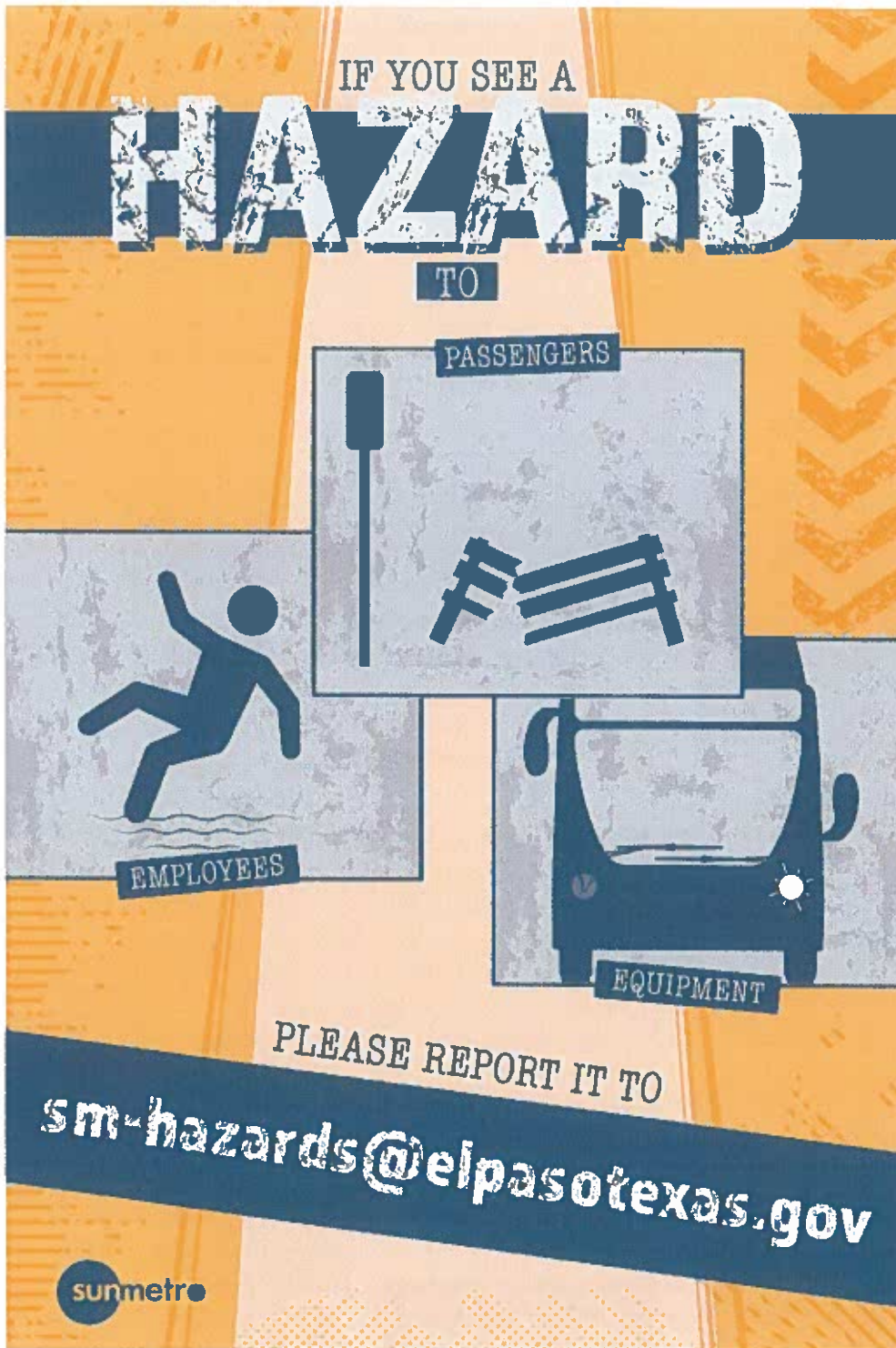
- Willful safety violations
- Reckless and negligent acts
- Criminal activities
- Alcohol or drug use

Please email your concerns to sm-hazards@elpasotexas.gov or use the QR code on the back.

Point your camera at the QR code, wait for code to scan, and then open.



4. Promotional E-mail for Reporting Hazards



3.6 Safety Management Policy Communication

Each safety manager is responsible for communicating the safety policies established in this PTASP to their employees. The Safety Manager must communicate the safety policy within 30 days after the PTASP has been approved by the Mass Transit Board.

The Safety Manager can use any or all the methods listed below to communicate the Safety Policy:

- **E-mail** – sm-hazards@elpasotexas.com: a safety hazard reporting email provides a streamlined, confidential, and accountable channel for reporting potential hazards. It facilitates efficient communication, enables timely responses, ensures documentation, and contributes significantly to the overall effectiveness of a Safety Management System.
- **Hazard Reporting QR Code**: Providing a QR Code address specifically dedicated to safety hazard reporting makes it convenient for employees to report safety concerns. It offers a simple, direct, and accessible way to communicate potential hazards.
- **Safety Bulletins**: safety bulletins are essential components of a Safety Management System. They ensure consistent communication, promote awareness, facilitate rapid responses to emerging risks, enhance employee education, and contribute significantly to the development of a robust safety culture within an organization
- **Toolbox meetings**: Regular safety Toolbox Meetings demonstrate the organization's commitment to safety. A proactive approach to communication creates a positive safety culture, encouraging employees to actively participate in maintaining a safe work environment.
- **General notices**: The General notices can swiftly address emerging safety concerns or industry updates. Rapid dissemination of this information allows the organization to respond promptly, implementing necessary changes or precautions to mitigate risks.
- **Formal classroom training**: Training can serve as an educational tool, providing employees with valuable information on new safety equipment, procedures, or regulations. Regular training through formal classroom training ensures that employees are continuously learning and staying up-to-date with industry standards.

Specific to Rail, the additional methods are also used to communicate the Safety Policy:

- A USB drive will be issued to all of the Streetcar employees with all the necessary information including the SOPs SMP's PTASP.
- A monitor dedicated to the safety department displaying any relevant Safety Management Policies

These additional methods will ensure that the Safety Management Policies are readily accessible to everyone in the organization.

The safety manager is responsible for documenting in writing which method was used and that all employees were formally notified and acknowledged that they received the information.

4 Safety Risk Management (49 CFR 673.25)

4.1 Safety Risk Management Overview

The objective of this section is to establish a process to manage hazardous conditions that exist across **all transit modes** operated by Sun Metro. The process will identify hazards, assess the hazards, develop corrective action to mitigate or eliminate the hazard, and assess the success of the corrective actions in eliminating or minimizing to an acceptable risk status by the mitigations. Refer to Sun Metro SOP 600.1 Hazard Management and Assessment.

Refer to the diagram below:



Sun Metro defines a hazard as 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 public transportation system; or damage to the environment.

The Chief Safety Officer or SMS Executive and the Safety Manager of each mode are directly responsible for the implementation and ongoing management of Sun Metro's Hazard Management process. This includes:

1. Developing, updating, and auditing the program
2. Training all designated Sun Metro employees and contractors on the hazard management process
3. Documenting and tracking all identified hazards to resolution.

The hazard resolution process is from 'cradle to grave' and can be applied throughout the 5 phases of the system life cycle.

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

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

The following are actions for hazard resolution:

1. Eliminate the hazard, if possible
2. Implement training, procedural strategies, or technology approaches, as appropriate, to reduce the hazard
3. Provide training to educate the workforce on possible hazards
4. If the hazard cannot be eliminated, reduce exposure to it
5. Monitor the Hazard mitigation to determine if the risk has been managed at an acceptable level so that it does not re-occur"

4.2 Safety Hazard Identification

Hazard identification encompasses a set of methodologies that first search throughout the system for anything with the potential to do harm. Identification of hazards is the responsibility of all divisions and is the key to system safety. Identified hazards are analyzed for severity, occurrence frequency, and cost feasibility of remedial action required to eliminate or reduce the hazard to the lowest practical level. The Safety Manager of each mode shall review all hazards identified and log them into the Hazard Tracking Log.

Hazards can be identified in several ways such as:

1. Design Review
2. Accidents, Incidents, System Reliability, and Failure Reports
3. Ride Checks and Proficiency Checks
4. System Inspections, Audits, and Regulatory Inspections
5. Customer, Contractor, and Employee Complaints
6. Safety Committee
7. Transit Industry Experience
8. Federal Transit Administration
9. Texas Department of Transportation (TxDOT-SSOA)

Sun Metro will use a hazard identification and analysis process before purchasing and accepting new equipment and modifications of existing facilities, systems or rolling stock, and infrastructure elements.

4.3 Safety Risk Assessment

Hazard Risk Assessment is a quantitative calculation based on largely subjective judgments used to determine the risk associated with each hazard and thus the urgency for implementing corrective measures to eliminate or reduce risk to a level of acceptability. Risk Assessment is comprised of evaluating hazard severity (categorizing the hazard) and evaluating hazard probability.

The factors considered in this analysis include system safety, schedule, and the impact on the public's perception of safety on the system in the community where the Streetcars operate.

4.3.1 Hazard Analysis

Analysis of a hazard is based on both the probability of occurrence and the severity of an event. Hazards with the greatest potential to cause serious injury are given the highest priority for immediate resolution. Hazard analysis also attempts to reduce the severity of accident events by introducing protective devices and equipment, procedures and/or forms, or system modifications that reduce the amount of human and property damage in an accident event.

While identifying, every hazard is virtually impossible, there are two methods for orderly identification of hazards: inductive and deductive analysis.

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

The CSO and the Safety Manager of each mode will continually evaluate the transit operation using the methods described above to identify new hazards. This will be documented as described in this document.

For existing infrastructure elements, vehicles, procedures/processes Sun Metro should consider using audits – either ad hoc or structured based on identified safety issues to identify existing hazards and hazard potentials.

The Chief Safety Officer or SMS Executive and the Safety Manager of each mode will be charged with performing the hazard analysis for that operation.

4.3.2 Hazard Severity

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

- Category 1, Catastrophic – Death, system loss, or severe disruption of service system-wide.
- Category 2, Critical – Severe injury, severe occupational illness, major system damage, or major system-wide disruption of service.
- Category 3, Marginal – Minor injury, minor occupational illness, minor system damage, or minor system disruption of service.
- Category 4, Negligible – Less than a minor injury, occupational illness, system damage, or less than minor system disruption of service.

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

If the Mode Safety Manager and/or the CSO / SMS Executive identify any Category 1 Catastrophic and Category 2 Critical hazards specifically hazards 1A, 1B, 1C, 2A & 2B on the streetcar system, the TxDOT-SSOA will be immediately notified using "TxDOT Industry Safe" software.

The OHA and/or PHA for all transit modes in Sun Metro will be periodically updated to ensure the hazards have been mitigated, reduced, or controlled to acceptable levels. The Safety Manager of each transit mode is responsible for updating the OHA and/or PHA.

4.3.3 Hazard Probability

The probability of an event or hazard occurring may be defined as a ratio of the number of times a specific event occurs to the total number of trials in which this event may occur during the planned life expectancy of a system. Generally, hazard probability is described qualitatively in potential occurrences per unit of time, miles, trips/runs or passengers carried. The table below identifies the probability thresholds used by the Sun Metro. A hazard probability may be derived from the analysis of transit system operating experience, evaluation of Sun Metro safety data, or historical safety data from other passenger rail systems.

Hazard Assessment Probability Levels

Hazard Probability	Probability Levels
A = Frequent	Likely to occur frequently to an individual item. Continuously experienced in the system. MTBE* is less than 1000 operating hours
B = Probable	May occur several times in the life of an item. May occur frequently in the system. MTBE is equal to or greater than 1000 operating hours and less than 100,000 operating hours
C = Occasional	Likely to occur sometime in the life of an item. May occur several times in the system. MTBE is equal to or greater than 100,000 operating hours and less than 1,000,000 operating hours
D = Remote	Unlikely, but possible to occur in the lifetime of an item. Unlikely, but can be expected to occur at some time in the system. MTBE is greater than 1,000,000 operating hours and less than 100,000,000 operating hours
E = Improbable	So, unlikely to occur, it can be assumed occurrence may not be experienced. Unlikely, but possible to occur in the system. MTBE is greater than 100,000,000 operating hours
F = Eliminated	Incapable of occurrence. This category is used when potential hazards are identified and later eliminated

* MTBE = Mean Time between Events

The Risk Assessment Process is used to prioritize hazardous conditions and focus available resources on the most serious hazards requiring immediate resolution. Sun Metro will use MIL-STD-882-E DOD Standard Practice for System Safety dated May 11, 2012, or the most current version, to assess the level of risk for each identified hazard to determine what action(s) must be taken to correct or document the hazard risk. This risk assessment system is incorporated into the formal System Safety analysis, which enables Sun Metro decision-makers to understand the amount of risk involved in accepting the hazard in relation to the cost (schedule, cost, operations) to reduce the hazard to an acceptable level.

The Risk Assessment Matrix informs the Risk Assessment Index based on potential severity and probability. The criteria for defining further actions are based on that index. Follow-up actions resulting from the Risk Assessment are as follows:

- ✓ **Unacceptable:** The hazard must be mitigated in the most expedient manner possible before normal service may resume. Interim corrective action may be required to mitigate the hazard to an acceptable level while the permanent resolution is in development.
- ✓ **Undesirable:** A hazard at this level of risk must be mitigated unless a documented decision to manage the hazard until resources are available for full mitigation is issued by executive management and forwarded to Sun Metro CSO for review and approval/disapproval.
- ✓ **Acceptable with Review:** The CSO must determine if the hazard is adequately controlled or mitigated as is.
- ✓ **Acceptable without Review:** The hazard does not need to be reviewed by management and does not require further mitigation or control.

Risk Assessment Matrix

Safety Risk Assessment Matrix					
MIL-STD-882-E		Severity			
		Catastrophic 1	Critical 2	Marginal 3	Negligible 4
Probability	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	1F	2F	3F	4F

Risk Assessment Index

1A, 1B, 1C, 2A, 2B	HIGH	Unacceptable
1D, 2C, 3A, 3B	SERIOUS	Undesirable with management decision required
1E, 2D, 2E, 3C, 3E, 3D, 4A, 4B	MEDIUM	Acceptable with review by management
4C, 4D, 4E	LOW	Acceptable without review
1F, 2F, 3F, 4F	NONE	Incapable of occurrence. This category is used when potential hazards are identified and later eliminated



Categories

Category	Description	Description
1	Catastrophic	Death, system loss, or severe environmental damage
2	Critical	Severe injury, severe occupational illness, major system or environmental damage
3	Marginal	Minor injury, minor occupational illness, or minor system or environmental damage
4	Negligible	Less than minor injury, occupational illness, or less than minor system or environmental damage

Probability

Level	Description	Specific Individual Item	Fleet Inventory
A	Frequent	Likely to occur frequently	Continuously experienced
B	Probable	Likely to occur several time in the life of an item	Will occur frequently
C	Occasional	Likely to occur sometime in the life of an item	Will occur several times
D	Remote	Unlikely but possible to occur in the life of an item	Unlikely but can reasonably be expected to occur
E	Improbable	So unlikely, it can be assumed occurrence may not be experienced	Unlikely to occur, but possible
F	Eliminated	Completely removed from consideration	Removed from consideration

4.4 Safety Risk Mitigation

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

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

Sun Metro uses the following methodology to ensure system safety objectives to eliminate or control hazards. These controls are implemented throughout design, construction, procurement, and operations:

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

The Initial Risk Index defines the magnitude of any specific hazard item without the implementation of design, construction, procurement, or operational measures to control or mitigate the risk. The Safety Manager by mode will identify sets of proposed mitigation actions to eliminate or control each identified risk and evaluate the Residual Risk Index. Based on those mitigating actions, to assess the potential effectiveness and inform the Sun Metro Associate Director of Streetcar Operations, a determination of whether the hazard is adequately controlled or mitigated will be made.

5. Safety Assurance (49 CFR 673.27)

5.2 Safety Assurance Process Overview

This section describes the different processes used to track the implementation of Sun Metro's Safety Management System.

This includes but is not limited to:

- Formal audits
- Inspections
- Monitoring Rule and Standard Operating Procedure (SOP) compliance.
- Constant evaluation of hazards already mitigated.
- Monitor Sun Metro operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

Sun Metro understands that hazard management is not only the management of new hazards but also the management of mitigating hazards. Sun Metro will evaluate mitigations already implemented to verify their effectiveness.

This table is a simplified explanation of Sun Metro's Safety Assurance section:

Safety Assurance Process	If yes, then...
Procedures Monitoring and Measurement	
Inadequate compliance?	Address non-compliance
Insufficient?	Evaluate hazards through the Risk Management Process
Safety Risk Mitigation Monitoring and Measurement	
Ineffective?	Evaluate hazards through the Risk Management Process
Inappropriate?	Identify new mitigation under the Risk Management Process
Not implemented?	Address non-compliance
Safety Event Investigations	
Causal factors identified?	Evaluate hazards through the Risk Management Process
Information collected?	Use to monitor and measure through other Safety Assurance processes
Internal Reporting Programs Monitoring and Measurement	

Safety Assurance Process	If yes, then...
Safety concerns identified?	Evaluate hazards through the Risk Management Process
Information collected?	Use to monitor and measure through other SA processes

5.3 Safety Performance Monitoring and Measurement Section

5.3.1 Process to monitor compliance with operation and maintenance procedures

This section describes how Sun Metro will monitor:

- Compliance with and sufficiency of operations and maintenance procedures.
- Operations to identify safety risk mitigations that may be:
 - Ineffective could re-analyze the hazard(s) and consequence(s) the mitigation was intended to address through Risk Management.
 - Inappropriate, could identify new mitigation options.
 - The mitigation may not be feasible.
 - Not implemented as intended, could consider alternative mitigations or alternative approaches to implementation.

Sun Metro Key Staff will assess the information gathered using the processes described in this section and evaluate how to address it.

5.3.1.1 Facilities and Equip Inspections

Please reference the Streetcar Operations Maintenance Plan (OMP) for more detailed information on the topics presented.

Facility Inspections

Periodic safety inspections are performed on all Sun Metro facilities to detect and resolve hazards in order to effectively safeguard employees, visitors, and passengers. The Safety Manager of the specific mode and/or maintenance staff will perform safety Inspections of the Sun Metro facilities.

The Safety Manager of the specific mode is responsible for ensuring hazards are addressed and corrective actions are captured and logged in the consolidated Hazard Tracking log of that mode. The Safety Manager of the specific mode must complete at a minimum one quarterly safety inspection in the facility under their supervision. The inspection will include but is not limited to housekeeping, fire extinguishers, and guard rails/stair rails in the proper place.

For the Track Sweep on El Paso Streetcar, the maintenance staff will be properly trained to perform the track sweep inspection.

Note: Sun Metro does not fall under OSHA requirements but rather the City's own Safety Policy.

Equipment Inspections

- Inspections of facility equipment are made in accordance with appropriate maintenance manuals and procedures. The Safety Manager of the specific mode works with the Mode Maintenance personnel and Sun Metro Facilities to ensure equipment and facilities are maintained at an optimum level of safety. Hazards identified during inspections are entered into the Hazard Tracking Log of the mode as appropriate and tracked until closure is achieved.

5.3.1.2 Maintenance Inspections

Each mode is responsible for developing and implementing a Maintenance Inspection program. This program will be implemented by the Safety Manager of the specific mode with the support of Sun Metro CSO and the City of El Paso Office of Risk Management and Safety.

Each Sun Metro facility inspection report is sent to the responsible party to create the appropriate work orders. It identifies specific areas and targets specific recommendations for corrective action. Identified unacceptable hazards are reported to the CSO. Hazards identified during these inspections are entered into the Hazard Tracking Log of the specific mode as appropriate.

Work Orders are generated in Fleet Net software for defects identified during Streetcar Maintenance, Sun Metro Facilities Management, and EPSC Systems Maintenance inspections. Fleet Net is the software used by Sun Metro to generate, track, and close all work orders generated by the appropriate departments. Hazards identified during these inspections are entered into the Hazard Tracking Log as appropriate and evaluated by the Safety Manager of the mode. Mitigation of Hazards are tracked to closure using the mode Hazard Tracking Log.

Checklists for Facilities are included in the Facility Maintenance Plan, Vehicle Maintenance Plan, or other specific SOP. The checklists are created by the Mode Maintenance Department with the assistance of the Safety and Operations of the mode.

At random the Safety Manager of the mode and/or Chief Safety Officer or SMS Executive will perform inspections to verify previous inspections and maintenance were performed in accordance with OEM recommendations. If areas of improvement are found, the Facility and Maintenance department will be required to present CAPs to the CSO. Those CAPs will be included in the CAP Log for tracking and closure.

5.3.2 Safety Data

The Chief Safety Officer or SMS Executive & the Safety Manager of the mode will monitor the safety performance of the various Sun Metro operations. Accidents, incidents, injuries, and other safety data are collected throughout the division and analyzed to determine trends within the organization. The safety data collected is analyzed to determine if safety performance meets established safety goals outlined annually.

The accident and incident data also help to identify service areas that generate a higher percentage of accidents or potential for higher accident rates. Safety data collected

includes injuries to passengers, Sun Metro personnel, and the public; hazardous equipment failures; unacceptable hazardous conditions; vandalism and security hazards; and rules and procedures violations. The Safety and Security Division analyzes safety-related data to implement corrective action to assist in preventing or mitigating the reoccurrence of hazards.

Data Acquisition

Information regarding accidents, incidents, and hazardous conditions of Sun Metro is obtained from several different reporting sources.

These include, but are not limited to the following reports or logs:

- a. Accident/Injury Reports
- b. Blocking log
- c. Audits
- d. Inspections
- e. Ride checks
- f. Unusual Situations Reports
- g. Event Reports
- h. Transit Master Operation Incident Report
- i. Employee/Occupational Injury reports
- j. National Transit Database (NTD) Safety and Security reporting module

Data Analysis

Hazard data is used to identify trends. Trends are then further analyzed and/or investigated by the Chief Safety Officer or SMS Executive and/or Safety Manager of the mode to determine causal factors. Interviews with personnel in the affected division(s) may also be conducted. The various safety teams identify hazards, areas susceptible to accidents, traffic problems, and other critical factors to develop corrective actions for hazards.

Reports

The Safety Manager of the mode analyzes the data from reports, incident investigations, safety committees, field inspections, Police Reports, and Risk Management. The Safety Manager of the mode also uses the data acquisition and analysis process to identify system trends and to monitor safety and security program performance. The Safety Manager of the mode provides monthly safety program performance reports to CSO.

Currently, safety performance reports (in conformance with those submitted to the National Transit Database - NTD) are submitted to FTA on a monthly and annual basis. The reports contain injury data regarding passengers, Sun Metro personnel, and customer/public accidents and incidents.

Sun Metro uses this report to establish safety performance goals and objectives for each coming year.

5.4 Process to conduct investigations of safety events to identify causal factors

Each mode is responsible for developing a specific accident investigation procedure. The safety manager of each mode will develop and/or update their accident investigation procedure. Each procedure will be submitted to Sun Metro CSO and AE for review and approval.

Each accident/incident is investigated as specified in the latest version of the Sun Metro Accident Investigation Procedures. The Procedures will comply with 49 CFR Part 672, 673 & 674, State Rail Safety Oversight Rule (for streetcar) for rail incidents/accidents, and 49 CFR Part 1582 U.S. Department of Homeland Security Rule affecting transit systems. For Streetcar, please refer to SOP 700.1 Revision 1 as approved by TxDOT for details on safety event investigation.

All Sun Metro employees and contractors are expected to comply with Sun Metro accident and incident reporting procedures and use the forms prescribed. Roles, responsibilities, and accident reporting thresholds are outlined in the procedures, including accident notification, reporting, and investigation throughout the organization. The level of investigation required is dependent on the seriousness of the event.

The accident investigation procedures will be revised **annually or any time** there is a change in the FTA or TxDOT regulations and requirements. In addition to the accident investigation procedure, Sun Metro has SOPs to address accident notification & event management.

5.4.1 Accident Notification

All Safety Managers are required to develop an accident notification procedure specific to their mode. As a minimum, the following notifications must be done:

- Internal Notification: Develop a process to notify Sun Metro Management in case of accidents or events that may require upper management notification.
- External Notification: At a minimum, the following external agencies will require notification within 2 hrs. as applicable:
 - Notification to FTA will be submitted by TOC-1@dot.gov / 202-366-1863
 - The notification will be submitted using the TxDOT – SSO Tracker for initial Accident Notification (for Streetcar within 2 hrs.).
 - The National Transportation Safety Board will be notified by calling the National Response Center at 1-800-424-0201

5.4.2 Event Investigation Methods

The following investigative methods will be included but are not inclusive of the investigation process:

- On-site inspection of the incident scene;
- Review (if necessary) of:
 - Maintenance, operations, or employee training records and
 - The results of post-accident drug and alcohol tests
 - Camera footage, audio recordings, and other data downloaded from electronic devices and recorders

- Collection of all pertinent facts and evidence available, or near the scene of the accident/incident;
- Conduct interviews of employees involved or other witnesses at the site when appropriate;
- Observe employees in the performance of work
- An assemblage of all pertinent reports, data, and records associated with the accident/incident,
- Conduct follow-up interviews, and/or re-enactments to complete the accident investigation
- Perform analysis as required to determine the causative factor(s) for each accident/incident;

5.4.3 Photographs

All accident investigation scenes must be photographed as soon as possible from a panoramic view, preferably before the accident scene is disturbed. Scene photographs should be taken using a '4-point compass' method. The entire scene should be photographed from multiple vantage points. The photographer should attempt to provide sufficient depth of field to show the relative positioning of objects and subjects for later comparison with diagrams.

Arrange to have specific objects or subjects photographed as soon as possible from both normal periphery and close-up views, preferably, **before the accident scene is disturbed**. These photographs should attempt to include, at a minimum:

- a. For each vehicle involved, the exterior has four sides, including a number
- b. Each vehicle involved, an interior compartment
- c. Each vehicle involved, operating control compartment
- d. Resting position of wheels on the track, including evidence of sanding
- e. All visible points of vehicle damage
- f. Evidence of wheel marks on the rail
- g. All visible points of infrastructure damage
- h. Any visibly evident contributing obstructions, objects, or conditions
- i. Position of casualties, if stationary
- j. Any other subject that appears out of the ordinary

5.4.4 Reports

It will be the responsibility of each Safety Manager to prepare an event report. All Event Investigation Reports will be reviewed and approved by the Mass Transit Chief Safety Officer SMS Executive or designee.

The Event Investigation Reports must compile the accident/incident information; and findings evaluated during the investigation process and will include the recommendations to prevent recurrence with the corrective action plan.

For Streetcar, the report will be prepared using TxDOT's Industry Safety software. Refer to Streetcar SOP 700.1 *Event Investigation* for details.

5.5 Continuous Improvement Section

5.5.1 Internal Safety Audit

The purpose of internal system safety audits is to perform an official evaluation of accomplishments, problems, and trends related to total Sun Metro safety and to evaluate the effectiveness of the implementation of the PTASP.

The CSO is responsible for the direction of the safety reviews and audits of Sun Metro divisions and contractors to determine performance related to the System Safety goals and objectives. The audits will be performed by the City of El Paso Office of Risk Management.

All Sun Metro divisions and contractors are subject to safety audits. The critical nature of certain operations requires rigorous development of reviews and audits. These include training, maintenance, and operations activities. Both periodic and no-notice inspections are undertaken to address all aspects of the activity including documentation, practices, and compliance with the PTASP, Sun Metro policies, and other requirements.

The CSO reviews training, practices, and procedures to correct deficiencies identified while conducting audits or other safety activities, including inspections and emergency drills.

5.5.1.1 Purpose and Scope

The purpose of internal safety audits is to confirm all safety elements are in place and that assigned safety tasks and activities are being accomplished. This provides an additional means of documentation for senior management to verify how well each division is fulfilling its safety-related goals and objectives as required in the PTASP.

5.5.1.2 Safety Audit Process

The Chief Safety Officer or SMS Executive with the help of the Office of Risk Management of the City of El Paso is responsible for the management of the Internal Safety Audit Program. All Sun Metro divisions are required to cooperate fully with Safety and Security personnel. Executive and senior managers ensure their divisions participate fully in the safety audit process. Office of Risk Management of the City of El Paso is responsible for submitting to TxDOT the auditing checklist for Streetcar a minimum of 30 days in advance of a scheduled safety audit

5.5.1.3 Integrity of Review Process

To maintain the integrity of the review process, an audit team is used to conduct safety audits. The Safety Manager of the mode does not perform audits/reviews of those functions and elements for which they are directly responsible for implementation. These elements are audited by the Chief Safety Officer or SMS Executive and Office of Risk Management of the City of El Paso, an outside contractor, or an independent member of the audit team. No team member shall audit a function or activity for which they are responsible.

5.5.1.4 Cycle/Schedule

Over a three-year period, all the elements of the PTASP must be audited at least once. Sun Metro's Internal Safety Audit Process is intended to be an ongoing, continuous safety review process. The CSO/SMS Executive will provide and submit annually a comprehensive Internal Safety Audit schedule detailing when it will audit these elements over the three-year period.

The annual audit schedule must be developed, reviewed, maintained, and updated to ensure all elements of the PTASP are reviewed during the audit cycle.

Tentative Sun Metro Audit Schedule 2024

2024			
	Sun Metro - Lift	Sun Metro - Streetcar	Sun Metro - Bus
90-Day Notice to Sun Metro	Friday, March 8, 2024	Friday, June 7, 2024	Friday, April 5, 2024
60-Day Notice to Sun Metro	Monday, April 8, 2024	Tuesday, July 9, 2024	Friday, May 3, 2024
30-Day Notice to Sun Metro	Wednesday, May 8, 2024	Friday, August 9, 2024	Friday, June 7, 2024
Audit Commencement	Monday, June 10, 2024	Monday, September 9, 2024	Monday, July 8, 2024
Audit Conclusion	Friday, June 21, 2024	Friday, September 20, 2024	Friday, July 19, 2024
Sun Metro Responses	Friday, July 19, 2024	Friday, October 18, 2024	Friday, August 16, 2024
Finalized Audit Report	Friday, August 16, 2024	Friday, November 22, 2024	Friday, September 20, 2024

The Chief Safety Officer or SMS Executive and/or Safety Manager notifies the division/organization and TxDOT (for streetcar) a minimum of 60 days in advance of a scheduled safety audit.

5.5.1.5 Checklists and Performance of Safety Audits

Audit checklists are developed in advance for each transit mode by the City of El Paso Office of Risk Management. The checklists include the elements on which the department will be audited. Checklists are prepared during the review of the PTASP section, documents referenced in previous audits, and corrective actions.

The Sun Metro's auditing checklists must be submitted by the City of El Paso Office of Risk Management to TxDOT for review and approval. This review package shall be submitted in time to receive TxDOT approval no less than 60 days prior to conducting the ISR. The Audit checklists are then provided to the organization being audited as soon as possible after receiving TxDOT's approved checklist(s).

Pre-audit and post-audit conferences are held by the audit team with the entity being audited. The safety audits are comprised of record reviews, interviews, field observations, and inspections and measurements to verify the accuracy of documentation and spot

inspections of facilities and equipment to verify compliance with the PTASP, procedures, codes, and regulations.

The following list of documents may be used to support the development of the audit checklists:

- PTASP
- Rule Book, bulletins, and/or procedures
- Standard and emergency operating procedures
- Training program documentation
- Management and/or administrative plans/procedures
- Design standards and criteria
- Accident and investigation reports
- Hazard tracking logs
- Corrective Action Plans
- Previous audit reports
- Other sources as determined by TxDOT SSO upon request

5.5.1.6 Audit Report

Upon completion of each audit report, the City of El Paso Office of Risk Management will issue a final report of the results and specify areas of deficiency, prepare recommendations, identify the need for corrective action plans, and distribute copies of the report to the Sun Metro Management staff and the audited Division. Responsible Divisions are expected to develop corrective actions, though the audit team may make recommendations and must approve corrective actions.

The results of the audit will be used for positive corrective action, and not as an internal regulatory process. Safety Audit coordination meetings and management briefings are to be held to review areas of concern or disagreement over findings and evaluate possible corrective actions. The Safety Manager will monitor and track corrective actions with the affected divisions to ensure implementation.

The Chief Safety Officer or SMS Executive will provide a draft safety audit report generated by the City of El Paso Office of Risk Management to TxDOT SSO for the El Paso Streetcar. RTA shall submit the ISR final report to TxDOT within 60 days of the closeout meeting. In no case shall the RTA submit the ISR final report later than February 1st. TxDOT SSO will make additional recommendations to the audit report before the final issue of the report. Office of Risk Management of the City of El Paso will submit the auditing reports to the Accountable Executive. The Accountable Executive is responsible for signing the report and submitting it to TxDOT.

5.5.1.7 Annual Report Review

An annual safety activity report and Safety and Security audit report must be provided to the Director and TxDOT SSO for review and approval no later than February 1st.

Sun Metro must also include a formal letter signed by the Executive Director certifying its PTASP. If the safety audit's findings indicate noncompliance with its PTASP, the Executive Director must identify in the formal letter the nature of the noncompliance and

the steps Sun Metro will take to achieve compliance. An implementation schedule detailing when compliance will be achieved may also be provided.

5.5.1.8 Coordination with TxDOT

As noted above, the following aspects of the Internal Safety Audit Process are coordinated with TxDOT regarding the streetcar:

- Internal Safety Audit Cycle and Schedule
- Safety Audit Checklists
- Dates of Completion of each Safety Audit
- Each Safety Audit Report
- Corrective Action Plans
- The Annual Safety Audit Report
- The Director of Annual Certification

5.5.1.9 Review Completeness

The CSO (or other entity performing safety audits) is responsible for ensuring the Safety Audit Checklists provide for a complete review of each of the PTASP Elements. In addition, the Safety and Security Division (or other entity performing safety audits) shall ensure the required Safety Audit/Review reports are comprehensive and accurate

5.5.2 Rules Compliance

Each Sun Metro mode is required to have and implement a Rules and Regulations Manual. These manuals are distributed to all new employees upon new-recruit orientation. On-going training is provided through the rulebooks and procedures during operations and in maintenance training courses.

5.5.2.1 Review of Rules and Procedures

Policies, plans, rulebooks referenced above, and procedures are reviewed periodically to verify they meet the needs of the transit system in normal and emergency conditions. Accordingly, Sun Metro Instructors target safety practices intended to instill a safety culture in its workforce.

The Chief Safety Officer or SMS Executive and each mode safety and operations manager coordinate additions to or deletions from these documents which impact the safe operation of the system. Sun Metro Manuals, Policies, and Procedures by mode stipulate control and distribution, including the three-year review process.

The length of time needed for the review may vary based on the document being reviewed but no reviewer should delay the evaluation/review process more than thirty (30) days. The section managers may issue a Bulletin, Notices, General Orders, and Operating Orders when an immediate update is required to an operating rule or procedure. Sun Metro safety committees, accidents/incidents, and audit reviews are additional opportunities for rules review.

5.5.2.2 Process for Rules Compliance

Each Sun Metro Supervisor (regardless of the mode) shall conduct ride checks of each operator at a rate determined by each mode.

Each mode uses a specific **Ride Check Forms** to evaluate the operators in a standardized way. Ride Checks provide an opportunity for retraining employees to an acceptable level of compliance regarding specific rules.

Sun Metro Safety division will perform Radom DVR reviews to verify the rule compliance of the drivers. Refer to SOP 600.13 Random DVR Inspections.

5.5.2.3 Compliance Techniques – Operations and Maintenance Personnel

Compliance techniques include observation of work activities and tasks and making pop questions regularly to employees about their knowledge of the respective rulebooks and handbooks. During initial training, employees are formally tested on their knowledge of applicable rules and procedures through written examinations.

5.5.2.4 Compliance Techniques – Supervisory Personnel

The Safety Manager or designee of each mode conducts ride checks to evaluate the effectiveness of compliance methods utilized by supervisory personnel. The ride checks asses employees' knowledge of rules and procedures and validates the success of Sun Metro's employee training programs.

Ride check forms completed are forwarded to the Mode Operations Manager to be included in employee performance reviews. Recommendations for improvement of the compliance methods are submitted.

5.5.2.5 Documentation

The results of the proficiency checks performed by operations and maintenance supervisors are documented on the appropriate form and are made available to the Safety Manager and Chief Safety Officer or SMS Executive. Hazards identified during these operations and maintenance rules compliance checks and assessments are captured within the Hazard Tracking Log and subsequently tracked to closure.

All Ride Checks are performed following the transit mode SOP for Ride Checks. All forms will be included in the employees' training folder.

5.5.3 Local, State, and Federal Rules Compliance

Sun Metro is committed to a dedicated safety program covering all applicable federal, state, and local regulatory requirements to ensure a safe and healthy work environment.

The Safety Manager of each mode has the primary responsibility of safety program implementation and enforcement to ensure that the employee in their respective mode is aware of job-related hazards through an ongoing process of training, job briefings, and departmental notices located throughout all affected areas.

5.5.3.1 Risk Reduction Program

As established in the Bipartisan Infrastructure Law requires Sun Metro's Public Transportation Agency Safety Plan (PTASP) to include the risk reduction program that covers the following topics:

- (I) Transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the national transit database
 - a. The mitigation of assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on buses, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators when a risk analysis performed by the safety committee determines that such barriers or other measures would reduce assaults on transit workers and injuries to transit workers.
- (II) A reduction of vehicular and pedestrian accidents involving buses includes measures to reduce visibility impairments for bus operators that contribute to accidents, including retrofits to buses in revenue service and specifications for future procurements that reduce visibility impairments.
- (III) The safety committee shall establish performance targets for the risk reduction program using a 3-year rolling average of the data submitted by the recipient to the national transit database under section 5335.

5.5.3.2 Exposure to Infectious Diseases

As established in the Bipartisan Infrastructure Law, Sun Metro's Public Transportation Agency Safety Plan (PTASP) Sun Metro shall develop strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions, and consistent with guidelines of the Centers for Disease Control (CDC) and Prevention or a State health authority, minimize exposure to infectious diseases. To comply with this requirement Sun Metro has established their Bloodborne Pathogens SOP and our Pandemic Plan to reflect the best practices of the industry and CDC guidelines.

5.5.3.3 Assault Awareness and Prevention for Transit Employees

To prevent and protect Transit Employees from physical assaults including (hitting, spitting, beatings, stabbings, and things being thrown at operators' threats intimidation, and any other hostile act.

- Install protection barriers or shields in the driver's area to minimize the severity of assault
- Conduct conflict and aggression training for all transit employees consisting of de-escalation techniques for drives focusing on key factors:
 - (I) Defining assault and identifying transit employee assault incidents – define what is considered assault and identify factors that increase vulnerability to assault incidents.
 - (II) Recognize key vulnerability factors – Identify behaviors that help maintain professionalism decide which communication skills to use when dealing with passengers, and customers, and practice strategies and techniques to defuse difficult interactions with the public.
 - (III) Practice communication and response skills – Conduct role-playing scenarios and solutions to a potential assault scenario.

- (IV) Reporting incidents – how to evaluate the severity and able to report to the correct jurisdictional authorities
- (V) Importance of seeking assistance when assault incidents occur – to realize the significance of reporting and explain the importance of seeking help and/or assisting when there is difficulty dealing with public assault incidents.

The above training standards and practices will assist transit employees in:

- Identifying safety hazards and potential consequences.
- Asses the associated safety risks and prioritize hazards based on the safety risk of potential consequences.
- Identify necessary mitigations or strategies to reduce the likelihood and severity of the hazard's potential consequences.

5.6 Corrective Actions

This section describes the general process of how Sun Metro will manage all corrective actions generated after the occurrence of an accident and subsequent investigation; the development of recommendations, the identification of an unacceptable hazardous condition, or hazards along with deficiencies identified through internal or external safety reviews/audits.

The Mode Safety Manager will notify the CSO / SMS Executive and develop a CAP within 5 days of entering the CAP into Sun Metro's CAP Log. The CSO / SMS Executive will track and update the CAP Log every month. Mode Safety Manager may request additional time to prepare the CAP for complex issues.

The corrective action plan will include:

- The hazard or deficiency identified, and an investigation (if relevant to the CAP);
- Proposed Corrective Actions
- Proposed Timeline

Proposed actions planned to minimize, control, correct, or eliminate the unsafe, or hazardous condition, including interim action if required;

- Scheduled date of completion of implementation;
- Division and individual responsible for implementing the CAP; and
- Comments were subsequently added pursuant to the review and closure of the CAP.

Immediate or Emergency corrective action that must be taken to ensure immediate safety requires a 48-hour notification to TxDOT before implementation and must include:

- Source of the CAP,
- Location, if applicable,
- Summary of the issue requiring corrective action,
- Proposed corrective actions,
- If the CAP is an immediate or emergency corrective action,
- Date the issue requiring corrective action was discovered,

- Estimated start date,
- Estimated completion date, and
- Responsible Party and department(s) responsible.

The status of each Corrective Action is reported at FLSC Meetings. All corrective actions are prioritized for implementation using the risk assessment matrix and they are assigned a responsible person to lead the corrective action effort and close the corrective action after resolution. TxDOT requires that El Paso Streetcar CAPs be uploaded and tracked using SSO Tracker. Each mode is required to develop an SOP on how the mode will manage its specific CAPs. However, all SOPs must be approved by the CSO/SMS Executive for compliance with SUN Metro ASP.

5.7 Management of Change

The Management of Change addresses the processes to be followed to evaluate the risk of any changes proposed at all levels of the organization. The overall purpose of this process is to ensure that any proposed changes that impact operations will not increase safety risk; or where additional risk is identified that controls are put in place prior to the changes being implemented. Refer to Appendix C for a copy of the Configuration Management Plan.

Changes to organizational structure; the nature or extent of operations; facility or equipment assets; as well as mergers and acquisitions of new businesses are proactively managed through this process to avoid introducing or increasing safety risks.

- The resources required to complete the validation process, in terms of people, finance, and materials are included in this validation process.
- The allocation of responsibilities considers the competence of the individuals who are required to carry out the safety validation roles.
- All employees who may be affected by the proposed changes are consulted as part of the process.

The extent and scope of safety validation applied to any change proposal is proportional to the risks (safety, operational, and other risks) associated with its introduction

In the case of smaller, less complex, or well-understood changes, the safety validation of the change process may be implemented as part of normal operations, using existing organizational arrangements and meeting structures to deliver the required level of assurance.

Changes shall be classified as either Class I or Class II levels of safety validation. The originator may make an initial determination of the class of a proposed change, however, the Accountable Executive the Chief Safety Officer, or the SMS Executive may make changes to the original classification. The Accountable Executive has final decision-making authority as to the Class of the configuration change.

Class I Changes

Class I changes shall be developed and individually submitted for each proposed change

through a standardized Engineering Change Request (ECR) document, and/or through some other approved documented request process. The ECR or documented request will provide detailed information and any other related data to support the formal change approval, which will affect a change to the configuration of an asset. Class I changes directly affect the following:

- a. Form, fit, or function of an asset
- b. Safety of the transit system
- c. Warranty provisions of the test
- d. Acquisition or support costs of an asset or future spare parts

Class II Changes

Class II changes are all changes that are not classified as Class I changes. Generally, Class II changes are those required to amend, update, or add clarification to documents and drawings. All Class II changes are to be submitted individually on a standardized form, and/or through a documented request, with a detailed description of the proposed change

The process is generally described in the following chart.

Safety Validation of Change Process		
Main Steps	Key Activities	Completed By
1. Identify a Proposal for Change	<ul style="list-style-type: none"> • Raise change proposal (including Capital Expenditure Approval) • Inform relevant functional Manager(s) 	Change proposer
2. Determine Classification of Change Significance	<ul style="list-style-type: none"> • Classify the level of safety validation required • Ensure the extent and scope of validation are proportional to the level of risk 	Change proposer
3. Allocate Roles & Responsibilities	<ul style="list-style-type: none"> • Formally allocate change sponsor and change authorizer • Identify other required resources and roles for consultation 	Change proposer (with guidance)
Submit Change Proposal Form		Change proposer
Decide whether safety validation should proceed		Change proposer
4. Prepare Safety Validation of Change Case	<ul style="list-style-type: none"> • Prepare safety validation documentation • Complete risk assessment of proposed change • Submit for review • Revise and finalize documentation 	Change proposer & Mode Safety Manager
Submit the Safety Validation Checklist with supporting documentation		Change proposer
Approve and Implement, or Reject Change		CSO, AE

Safety Validation of Change Process		
Main Steps	Key Activities	Completed By
5. Monitoring and Review	<ul style="list-style-type: none"> • Monitor implementation of change and safety performance • Review the performance process 	Safety Manager

As part of the process to ensure specific safety concerns have been identified and addressed.

Additional responsibilities in the Safety Validation of Change process include:

- CSO provides safety expertise/support to those carrying out the safety validation.
- Safety Managers:
 - Review and approve each safety validation of the change process.
 - Decide on the level of safety validation required (consulting with other functional heads as necessary).
 - Provide safety expertise/support during safety validation activities as required.
 - Provide safety expertise/support to those carrying out the safety validation.

An electronic log of all proposed changes, whether approved or not, is maintained by the Mode-specific Safety Manager.

Each mode is responsible for developing its Management of Change SOP based on the process described previously. These SOPs will be submitted to the CSO / SMS Executive and AE for review and approval.

The process described previously in this section for monitoring safety data incorporates continuous improvement. As safety risk is identified, and then reported on, a determination is made as to whether the risk can be mitigated immediately or requires more time and resources.

Risk mitigations that can address the safety concerns immediately are carried out but still reported. The reporting of these concerns includes the mitigation steps that have been taken. Monitoring of the risk continues to ensure that the mitigation strategy is effective.

The Safety Risk Management section of this document describes the risk assessment and mitigation procedures used that determine how to proceed with improvement strategies that require more time and resources. Which improvement strategies to implement for longer-term issues are based on the severity and probability of risk occurrence? Additionally, safety hazard identification data is used to implement immediate corrective actions and proactively identify hazards before they cause future accidents or incidents.

The objective of hazard identification is to distinguish those conditions that can cause an accident or create an unsafe condition. Sun Metro routinely analyzes records from our operation to identify accident causation based on history. Current traffic conditions are

periodically analyzed, and management inspections of established prevention processes are routinely performed.

Safety Promotion Chapter (49 CFR 673.29)

6.1. Competencies and Training Section

- Instructions on safe methods of operation and safety procedures are included in rulebooks, manuals, handbooks, and other documentation developed for the training and certification of operations and maintenance personnel. Training systems have been developed to include in-house classroom training, field training, on-the-job training, and testing.
- Each Mode is responsible for establishing specific safety training requirements for its employees and contractors. The Mode Safety Manager is responsible for providing/coordinating new and revised safety training programs to the Chief Safety Officer or SMS Executive for approval.
- Each mode Training Plan must be compliant with 49 CFR 672 Public Transportation Safety Certification Training Program. As required, the Mode Training Plan must identify the safety-sensitive positions and their safety curriculum per position including required retraining.

6.1.1. Training and Certification Program

Each Mode Safety Manager is responsible for the development and implementation of their individual Training and Certification Plan.

The Public Transportation Safety Program includes two separate requirements for Sun Metro's Training and Certification Plan

- FTA's Public Transportation Safety Certification Training Program regulation, 49 CFR Part 672, specifies "a uniform safety certification training curriculum and requirements to enhance the technical proficiency of **individuals who conduct safety audits and examinations of public transportation systems and those who are directly responsible for safety oversight of public transportation agencies.**" (§672.1(a))
- FTA's Public Transportation Agency Safety Plan (PTASP) regulation, 49 CFR Part 673, requires **Sun Metro** to "establish and implement a comprehensive safety training program for **all agency employees and contractors directly responsible for safety** in the agency's public transportation system." The training program "must include refresher training, as necessary." (§673.29(a))

Designated personnel means:

- (1) Employees and contractors identified by a recipient whose job function is directly responsible for safety oversight of the public transportation system of the public transportation agency; or

- (2) Employees and contractors of a State Safety Oversight Agency whose job function requires them to conduct safety audits and examinations of the rail fixed guideway public transportation systems subject to the jurisdiction of the agency.

In Sun Metro, the following positions are classified as Designated Personnel:

- 1) Sun Metro Chief Safety Officer or SMS Executive
- 2) Transit Safety Manager
- 3) Streetcar Safety Manager
- 4) Transit Safety Officers
- 5) LIFT Operations and Safety Manager
- 6) Risk Management Senior Safety Specialist (responsible for Audits)

The training plans as a minimum must cover:

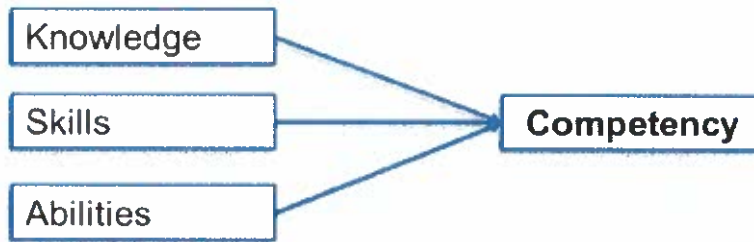
- 1) Safety-sensitive positions are covered in the mode Training Plan. This could include employees and contractors who work as part of the agency's safety function, such as safety officers and analysts, as well as operations and maintenance functions, such as managers, supervisors, and front-line employees
 - 2) Curriculum per safety-sensitive positions (initial training, refresher training, and re-training)
 - 3) Teaching strategies
 - 4) Recordkeeping
- El Paso Streetcar has a Training Plan already developed, submitted, and reviewed by TxDOT. The Training Plan also includes training on required SOPs for Operation and Maintenance.
 - The Maintenance staff will be trained in Standard Maintenance Procedures developed by El Sun Metro/El Paso Streetcar.

Each plan must be submitted to the Mass Transit Chief Safety Officer or SMS Executive for review and concurrence. Each plan must be reviewed annually by the Safety Manager of the mode.

6.1.2. Competency

Competency combines the knowledge, skills, and abilities required to effectively fulfill job roles

- 1) May cross various job roles and functions
- 2) May be useful as an employee training topic
- 3) Can be developed from a variety of sources



The safety managers of each mode are responsible for the competency of their employees and compliance with their individual Training Plans. The specific mode Training Plan must discuss what tools will be used to measure the competency of the personnel. Some examples are:

- Written test
- OJT test
- Exercises

6.1.3. Hazardous Materials Training

Sun Metro is fully aware of the importance of employee chemical safety programs and the duty to comply with legally mandated hazardous materials rules and regulations. To this end, Sun Metro has implemented a materials acceptance/rejection program to monitor and control chemicals, which are brought onto Sun Metro property to be used by employees.

Sun Metro's Hazard Communication Program (rev 0) Hazard Communication Program. Sun Metro's Hazard Communication Program covers the procurement, receipt, storage, and disposal of hazardous materials. It also documents the maintenance of Safety Data Sheet (SDS) binders and employee training.

Hazardous waste/chemical safety inspections are included in the responsibilities for safety inspections. Sun Metro has contracted the services of a properly licensed hazardous waste contractor for the removal of hazardous materials. When necessary, consultants may be hired for special projects such as indoor air quality, chemical vapor, and particulate sampling.

The Safety Manager by Mode reserves the right to reject a product if it is deemed either too hazardous for employee use or Sun Metro is unable to provide adequate safeguards or protection.

6.1.4. Drug and Alcohol Program / Training

Sun Metro is certified as a drug-free workplace and complies with all provisions of the U.S. Department of Transportation, Federal Transit Administration, 49 CFR Part 655, Prevention of Alcohol Misuse in Transit Operations, and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs. All Sn Metro Transit Modes follow the Sun Metro Substance Abuse Policy dated April 1, 2018.

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

City Human Resources, along with the Sun Metro Safety Managers and Sun Metro Human Resources Section are responsible for administering City Policy Drug and Alcohol-Free Workplace regulations.

Drug and alcohol testing is required under the following circumstances:

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

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

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

Sun Metro assists city employees with personal or related problems that could affect job performance through the Employee Assistance Program. On-site contractors working in Safety-Sensitive positions on Sun Metro property or ROW must have a drug and alcohol policy that complies with DOT guidelines.

The following positions fall under the definition of Safety Sensitive:

Operations

- Transit Operator Operate Revenue Service Vehicles*
- Transit Operator / Trainee Operate Revenue Service Vehicles*
- Transit Supervisor Controls Movement of Revenue Service Vehicles*

- Communication Dispatcher Controls Movement of Revenue Service Vehicles*
- The Transit Chief Safety Officer or SMS Executive manages the Safety and security of the Streetcar
- Chief Streetcar Officer Manages Streetcar Operations
- Assistant Director of Operations Manages Transit Operations
- Transit Superintendent of Operations Manages Transit Operations
- Transit Assistant Superintendent of Operations Manager Transit Operations

Maintenance

- Transit Fleet Service Supervisor Maintain Revenue Service Vehicles
- Fleet Service Worker Maintain Revenue Service Vehicles
- Fleet Services Assistant Maintain Revenue Service Vehicles
- Fleet Maintenance Supervisor Maintain Revenue Service Vehicles
- Fleet Maintenance Chief Maintain Revenue Service Vehicles
- Fleet Maintenance Lead Technician Maintain Revenue Service Vehicles
- Fleet Maintenance Technician Maintain Revenue Service Vehicles
- Electronics Lead Technician Maintain Revenue Service Vehicles
- Electronics Technician Maintain Revenue Service Vehicles
- Fleet Body Shop Supervisor Maintain Revenue Service Vehicles
- Fleet Body Shop Technician/Lead Tech Maintain Revenue Service Vehicles
- Fleet Maintenance Trainer Supervisor Maintain Revenue Service Vehicles
- General Services Worker Maintain Revenue Service Vehicles
- Streetcar Hostler Maintain Streetcar
- Streetcar Maintenance Technician Maintain Revenue Service Vehicle
- Streetcar Maintenance Supervisor Manages Streetcar Revenue Service Vehicles

*Vehicles refer to either a bus or a streetcar

6.1.5. Recordkeeping

All Sun Metro employees' training records are maintained by the corresponding modes (Streetcar, Fixed Route, and Paratransit)

Contractor training records are kept by following the individual companies' policies. However, these records must be available to Sun Metro at any time for inspection or audit.

6.2. Safety Communication:

At Sun Metro communication program goals are:

- Conveys information on hazards and safety risks relevant to Sun Metro employees and contractors' roles and responsibilities.
- Informs Sun Metro employees & and contractors of safety actions taken in response to reports submitted through the Sun Metro employee safety reporting program

Safety communication IS data sharing. This data sharing happens in several ways:

- Sharing data with compliance authorities;
- Sharing data with other service providers; and
- Sharing data with employees and contractors.

Safety communication has significant implications for safety culture and transparency. You might even say that transparency is simply how much information you communicate.

These are important points because the term “safety communication” does not quite capture the fact that what we are talking about is:

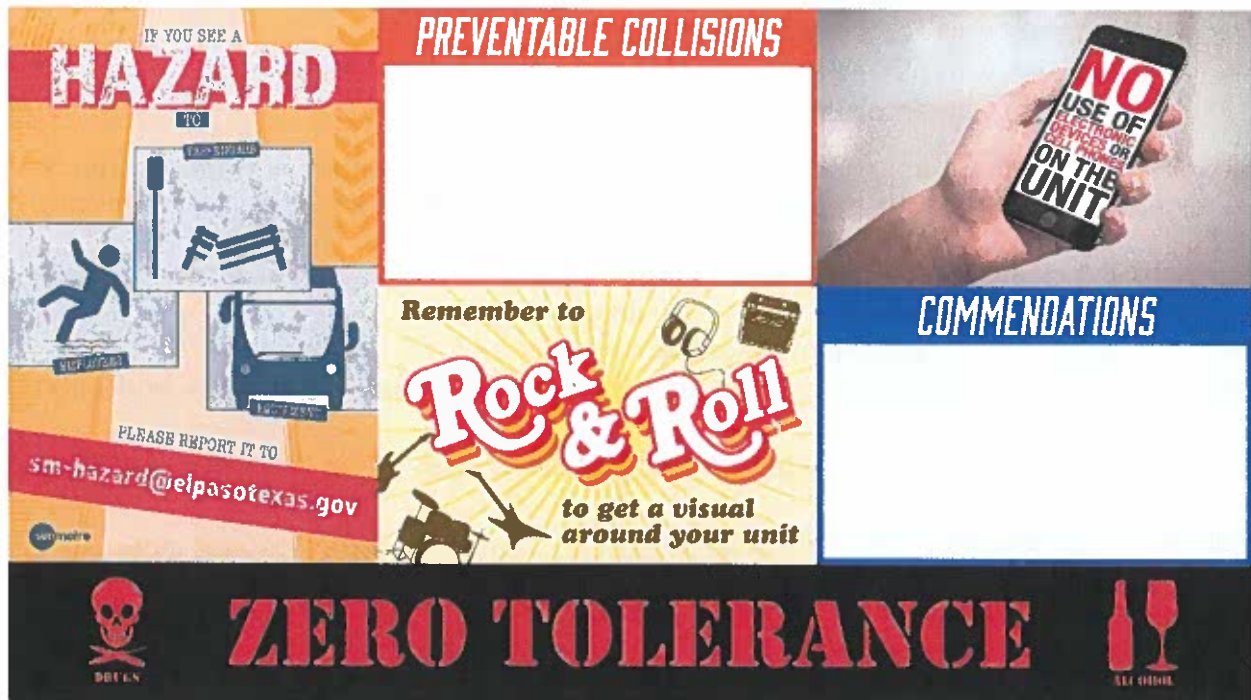
- The type of safety culture management practices;
- The type of relationship management has with front-line employees and other organizations; and
- How much trust does management have in employees?

Some best practices for communicating safety are:

- Having very clear internal rules or guidelines on role-based access to data – i.e., who can see what;
- Having many ways of implicitly and explicitly communicating data, such as:
 - Implicit: an issue manager that displays reported issue summaries;
 - Explicit: Sending out monthly newsletters
- Be as transparent with safety information as possible, as sharing too little or too much can hurt your safety culture.

At Sun Metro, safety communication will be implemented using the following tools to spread information throughout the system.

- **Monthly Safety Meetings:** Participation in this meeting is **mandatory** for all employees and supervisors. This meeting is led by the Mode Safety Manager and the CSO. The monthly safety meeting will be the forum where employees will be kept informed of how Sun Metro is managing the hazards and what mitigating actions are being implemented.
- **Maintenance safety toolbox:** This is a monthly meeting of the maintenance staff to discuss safety issues and also present the monthly safety video for maintenance.
- **Toolbox:** The supervisors will perform toolbox meetings to discuss any new train order, rule, or SOP. These toolboxes are documented by the supervisor.
- **Job briefings:** Every time non-routine work is performed; a job briefing is held to discuss the hazards associated with the task.
- **Safety Boards:** Each mode will develop and keep updating a billboard that will be used to communicate with the employees. The billboard must be kept up to date by the Safety Manager of the mode.



Sun Metro Bulletin Art.

6.2.1. Safety Committees

Sun Metro uses a multi-stakeholder approach to the Safety meetings where every Sun Metro division is involved along with any external agency that has a direct or indirect impact on transit operations. The Fire/Life Safety Committee (FLSC) is comprised of the following agencies:

- Sun Metro
 - Safety and Security
 - Fixed Route
 - Paratransit and Streetcar
- City Departments
 - Police
 - Fire
 - Streets and Maintenance
 - Risk Management
- UTEP
- TxDOT

The Sun Metro Fire/Life Safety Committee (FLSC) consists of a representative of every department and external agency. This committee meets every quarter.

The Division's Safety Committees are headed by a Transit Safety Officer or Mode Safety Manager and a manager of the division. They will be the front-line eyes and ears of Sun Metro Safety Division. In Sun Metro there will be the following safety committees:

- Facility & Vehicle Maintenance

- Operations
- Streetcar

The FLSC committee meets every quarter and is used to address the following:

- Bring specific concerns to the attention of the CSO.
- Ensure that all major accidents/incidents, hazards, and internal safety issues are reviewed and resolved
- Conduct internal safety reviews and inspections
- Report unacceptable hazardous conditions to Sun Metro executive management as soon as possible
- Work with modal operations and maintenance staff daily to ensure all System Safety Program requirements are being implemented and Program goals and objectives are being achieved
- Develop Corrective Action Plans (CAP) that result from accident/incident investigations, hazard analyses, and safety reviews and audits, and track corrective actions through fruition to ensure all identified deficiencies are adequately eliminated or controlled
- Ensure the Accountable Executive, CSO or SMS Executive, Mode Safety Managers, and other upper management personnel are immediately notified of hazards of imminent danger or as other problems are identified or arise
- Ensure recommendations are followed up on and corrected
- Review findings and comprehensive reports with recommendations, findings, and actions that cannot be resolved by staff. Develop action plans and monitor the implementation of any corrective action plan pursuant to any reports and recommendations
- Review, approve, or recommend changes to the reports and corrective action plans, prepared by the Committee for safety hazards and threat and vulnerabilities audit findings and corrective actions, prior to submittal of the final reports to the responsible parties for implementation
- Review, approve, or recommend changes to corrective action plans that are developed in response to recommendations of the TxDOT.
- Review, approve, or recommend changes to the annual reports of the internal safety review process required for submission to the TxDOT.
- Review, approve, or recommend changes to Sun Metro's safety rules and procedures established to implement the requirements and programs defined in the PTASP.

7. Emergency Preparedness and Response Plan

Major incidents such as accidents, fires, floods, violent crime, and terrorist attacks present significant challenges for public transit agencies. To successfully manage these events, personnel from multiple disciplines and agencies work together to promote the highest level of safety and to execute tasks such as perimeter control; rescuing or evacuating passengers; supporting the transportation of emergency responders and equipment; managing victims and their families; controlling crowds; repairing facilities; communicating with the media, and restoring service.

Sun Metro management recognizes that safety, security, and emergency preparedness encompass, not only the system, including employees, facilities, passengers, and operations, but also the local responders, planning organizations, and mutual aid partners within the communities it serves. Sun Metro has developed a coordinated emergency response program and a schedule of planned activities and exercises that encompasses local emergency responders, and relevant planning agencies, and establishes a working partnership that allows all entities to work together to identify vulnerabilities that may impact our respective ability to respond and recover from a major emergency incident. This effort is a continuous process that employs four integral functions: planning, inter-agency coordination, training, and exercises.

7.1. Planning

7.1.1. Sun Metro Emergency Preparedness and Continuity Plan

Sun Metro has a comprehensive System Security and Emergency Preparedness Plan (SSEPP). The SSEPP guides all activity and response during a system emergency or community event.

Sun Metro maintains Facility Emergency Plans for the following:

- Building Evacuation – General
- Fire
- Medical Emergencies
- Elevator Emergencies
- Bomb threats
- Biohazards or suspicious items
- Hazardous Materials Spills
- Workplace violence
- Other emergency conditions

7.2. Responsibilities for Emergency Preparedness

Sun Metro has adopted the Incident Command System (ICS) structure to respond to and manage an emergency event. The ICS Primary and Secondary Management functions and responsibilities are shown below

ICS Management Functions

ICS Management Function	Responsible Party
Command	Assistant Director of Streetcar Operations
Safety & Security	Streetcar Safety Manager, Chief Safety Officer, or SMS Executive.
Operations	Streetcar Operation Superintendent or Transit Supervisor
Technology	Sun Metro IT
Planning	Sun Metro Planning
Logistics	Streetcar Operation Superintendent or Transit Supervisor
Finance	Chief Financial Officer and Accountable Executive
Public Information	Sun Metro Marketing and City PIO

7.2.1. Crisis Communications Plan

A crisis is a sudden, unexpected event or set of circumstances that require immediate action. For this reason, Sun Metro has a Crisis Communications Plan that allows the organization to deal with each situation at hand and be prepared to communicate under crisis conditions. The Crisis Communications Plan allows the organization to go from a position of response and reaction to one of relative control.

A key step in preparing for a crisis is selecting a team of employees who formulate and implement Sun Metro's response. The Crisis Communications Team assumes responsibility for handling the response so that other employees can maintain normal functions of the office with as few disruptions as possible.

Below are the core team members responsible for formulating Sun Metro messages during a crisis:

- Mass Transit Director – Sun Metro
- Sun Metro's Assistant Director of Operations
- Mass Transit Chief Safety Officer or SMS Executive
- Safety Managers by Mode
- Sun Metro Manager by mode
- *Others are notified depending on the severity of the crisis

7.3. Coordinated Schedule

7.3.1. Interdepartmental / Interagency Coordination

Sun Metro's Managing Director, Chief Safety Officer or SMS Executive, and Department Managers will coordinate the schedule for emergency preparedness exercises; development of After-Action Reports and implementation of findings; procedure development, and training with the stakeholder agencies.

In the table below are the major federal, state, and local agencies and their primary responsibility to Sun Metro safety and emergency preparedness.

Table 9: Federal, State, and Local Agencies Primary Responsibilities

Agency	Reporting	Oversight	Support	Policy
Federal Transit Administration	X	X	X	X
Texas Department of Transportation	X	X	X	X
Transportation Security Agency	X	X	X	X
Department of Homeland Security		X	X	
El Paso Police Department	X		X	
El Paso Fire Department	X		X	
Emergency Management Office	X		X	
• El Paso Public Works	•	•	X	•
• City Attorney's Office	•	•	X	•

7.4. Emergency Drills and Exercises

Sun Metro, EPSC/ FLSC conducts or participates in a minimum of one Full Scale Exercise (FSE) or Tabletop Exercise (TTX) annually. Community first responders including the El Paso Fire Department, El Paso Police Department, local FBI, TxDOT, and El Paso Emergency Management may assist the transit system in planning, coordinating, and training to prepare for the drills and or Exercises.

Detailed scenarios are developed by the participants' management to ensure that the exercises are realistic, comprehensive, and effectively evaluate the emergency preparedness of the participants. Observers are assigned to each participant group to evaluate the effectiveness of the response to the exercise scenario.

After actual incidents, there is an assessment to return the system to 100% functionality in the shortest time possible. All divisions are responsible for executing this plan. The purpose of this phase is to make certain that all areas have been addressed appropriately and Sun Metro can sustain operations indefinitely. This phase is a self-assessment to determine ways to improve our processes and procedures and update all disaster-related plans. The following are examples of items that will be reviewed during this process:

- Division managers will provide the records to support all expenses associated with the emergency
- Each division will provide an update on the status of personnel, equipment, and facilities
- Division managers should provide a list of proposed changes to the comprehensive System Security & Emergency Preparedness Plan (SSEPP). to Sun Metro's Safety Managers
- Division managers should follow the SSEPP to achieve 100% functionality in their assigned area
- Division managers will identify any shortfalls or limiting factors that will prevent them from achieving 100% functionality
- Emergency supplies and equipment used during an emergency will be replenished

Immediately after the completion of an exercise, the participants will debrief and discuss the observations made during the exercise. An after-action report is prepared and distributed to the participants for follow-up with each participant group. The after-action report is used to determine the need for modifications to plans, procedures, and processes. The Sun Metro FLSC performs follow-up with all participant groups to develop a coordinated schedule for the implementation of corrective actions for the closure of identified after-action items. These corrective actions will be submitted to TxDOT and included in the Corrective Action Plan. The Chief Safety Officer or SMS Executive and the corresponding safety manager will be responsible for the implementation of these CAPs.

7.5. Emergency Procedures

Emergency Response Procedures are reviewed and revised in accordance with Sun Metro Plans, Manuals, Policies, and Procedures. This procedure stipulates control and distribution, including the three-year review process. The length of time needed for the review may vary based on the document being reviewed but the review should not exceed 30 days.

7.5.1. Emergency Preparedness Training

Employees receive emergency training during their initial indoctrinations. In addition, all employees receive training to respond to specific emergencies in accordance with the appropriate Standard Operating Procedures.

7.6. Familiarization Training

All fire department personnel have been provided familiarity training on Sun Metro buses and the streetcar system. All new fire department and emergency medical department recruits are provided classroom training and hands-on training on emergency preparedness for the Sun Metro system. The Safety and Security Division provided train-the-trainer instruction

Appendices

A. Mass Transit Board Approval Resolution

B. TxDOT Approval Letter

C. Configuration Management Plan

