



# PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

City of Phoenix Public  
Transit Department

December 2022



System:	City of Phoenix Public Transit Department	Document No:	PTASP
Revision #	1	Issue Date:	11/2/2022






City of Phoenix

# Public Transportation Agency Safety Plan Executive Summary

The City of Phoenix Public Transit Department (PTD) has prepared the Public Transportation Agency Safety Plan (PTASP, or Plan) to comply with the Federal Transportation Administration's (FTA) PTASP final rule 49 Code of Federal Regulations (CFR) Part 673, published on July 19, 2018. The rule requires public transportation system operators receiving federal Section 5307 funds to develop safety plans with processes and procedures that implement safety management systems (SMS) principles and methods. The SMS includes the PTASP's Safety Management Policy Statement, Safety Risk Management, Safety Assurance and Safety Promotion policies and procedures that encompass a top-down and data-driven approach to safety risk management and ensuring the effectiveness of safety risk mitigation. This Plan serves as the overarching PTD PTASP and is supported by the three separate contract operator Safety Plans, available as separate documents affixed to this Plan.

## Phoenix Transit Operations

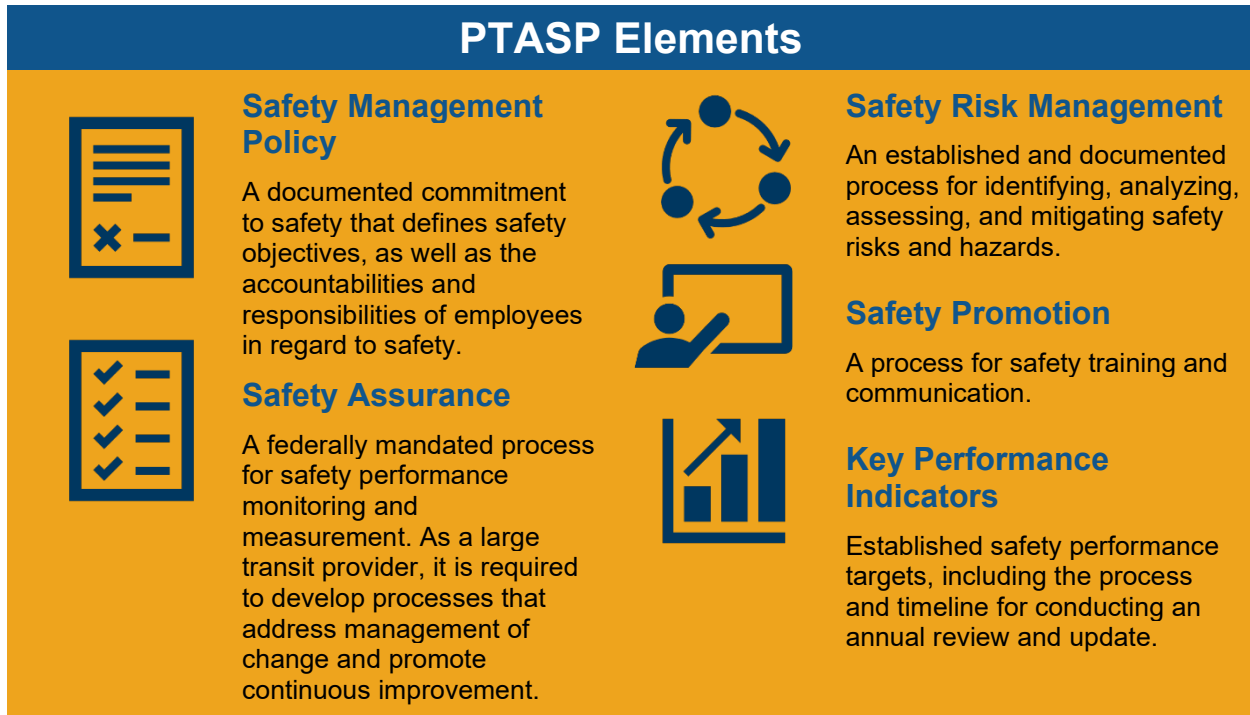
PTD operates fixed local bus service, neighborhood bus circulators, commuter bus service, and paratransit services in an area of approximately 518 square miles, with a population of nearly 1.8 million. Transit services are operated in partnership with three contractors (Contractors): First Transit Inc., Transdev Services Inc., and MV Transportation Inc. Day-to-day bus operations and maintenance originate with each contractor, and PTD works with each contractor individually to ensure an effective safety program for the entire Phoenix-operated transit system.

		
Developed a system-specific safety plan for <i>motor bus system</i> .	Developed a system-specific safety plan for <i>motor bus system</i> .	Developed a system-specific safety plan for <i>demand response system</i> .

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## Safety Plan Regulatory Background

On July 19, 2019, the FTA PTASP Final Rule (49 CFR Part 673.11(a)(3)) became effective. FTA established the PTASP compliance date to be July 20, 2020 and extended it to December 31, 2020. PTD finalized and approved the initial PTASP in



## Regional Relationships

PTD is responsible for overseeing the city's transit program and, at the same time, serves as the designated recipient for federal funding under FTA's Section 5307, 5309, 5310, 5316, 5317, 5337, and 5339 programs in the Phoenix-Mesa Urbanized Area. This includes the cities of Phoenix, Tempe, Mesa, Scottsdale, Glendale, Avondale, Fountain Hills, Peoria, Paradise Valley, Goodyear, Litchfield Park, Surprise, Tolleson, Youngtown and areas of Maricopa County.

In addition to managing FTA grant subrecipients, PTD is responsible for ensuring compliance with federal rules and guidelines for itself and the region's subrecipients. Each subrecipient enters into a Grant Pass-Through Agreement with PTD for the receipt of FTA funds.

PTD provides FTA funding for two transit agencies as subrecipients: the Regional Public Transportation Authority (RPTA) and Valley Metro Rail, Inc. (VMR). RPTA is a public agency, duly organized under the laws of the State of Arizona to operate regional bus service and is overseen by a board of its members' elected officials. Membership is open to all municipalities in Maricopa County and to the county government. VMR is a non-profit, public corporation that is responsible for the design, construction and operation of the 26-mile light rail system and future extensions. In addition, Scottsdale, Peoria, and Glendale provide local transit service within their jurisdictions, all as small transit agencies as defined in the PTASP final rule.

The Arizona Department of Transportation (ADOT) serves as the State Safety Oversight Agency for PTD and the Maricopa Association of Governments (MAG) serves the metropolitan Phoenix area as the regional Metropolitan Planning Organization for the agencies within Maricopa County.







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## Plan Development

PTD requires transit system Contractors to develop and implement safety plans unique to each contractor's system and scope of operation. In addition, PTD coordinated with MAG to develop regional transit system performance targets, by contractor and mode, in the PTASP, included in [section 6](#). Following the completion of the annual draft, the PTD Safety Committee reviewed the draft for concurrence, per 49 United States Code (USC) 5329(d)(1)(A).

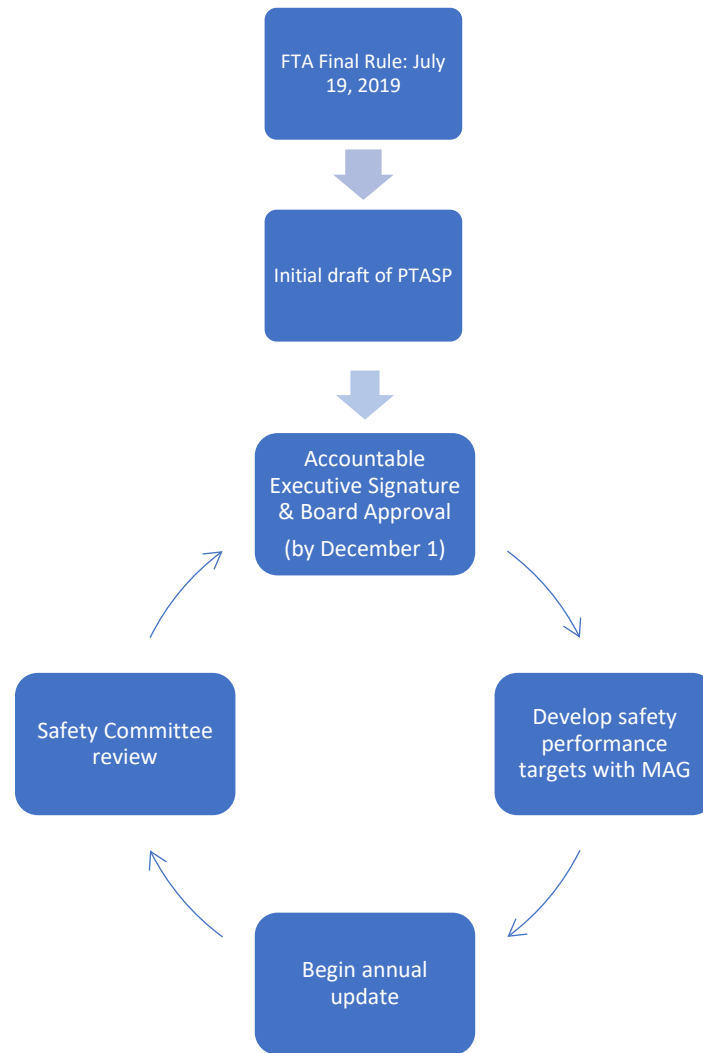
## Certification and Implementation

Prior to finalizing the PTASP was assessed by the PTD Safety Committee, which comprises an equal number of frontline and management staff at PTD. The Phoenix City Council adopted and certified the PTASP along with final signature by the Accountable Executive. The PTASP was shared with ADOT and MAG and implemented by PTD and Contractors.

Roles Defined in the PTASP	
	<b>Accountable Executive</b> An individual who has signing authority for the Plan. Examples of an accountable executive may include a city manager or department director.
	<b>Board of Directors</b> A board that must approve the Plan. In Phoenix, the City Council is the equivalent authority to the board of directors.
	<b>Chief Safety Officer</b> An individual who is responsible for safety within the transit agency and usually reports directly to the agency's chief executive officer or the equivalent position.
	<b>Safety Committee</b> The Safety Committee is a group responsible for reviewing safety concerns and hazards and review of the Plan ahead of signature by the Accountable Executive and the approval by the Board of Directors.

The PTASP followed the timeline as detailed below in **Figure 1**, starting with the FTA final rule and initial PTASP draft completed by PTD.

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**Figure 1 PTASP Draft Process**

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**Table 1: PTASP Revision Log**

Version Number	Section/Pages Affected	Reason for Change	Date Issued
Initial Revision	All		December 2020
Revision 1	All	Annual Review Bipartisan Infrastructure Law changes in 49 USC 5329	December 2022

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1. PTASP Performance Target Log

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## Glossary of Terms

**49 CFR Part 673:** The final rule for the Public Transportation Agency Safety Plan as authorized by the Moving Ahead for Progress in the 21st Century Act (MAP-21). This final rule requires states and certain operators of public transportation systems that receive federal financial assistance under 49 U.S.C. Chapter 53 to develop Public Transportation Agency Safety Plans.

**Accident:** An event that involves a loss of life, a serious injury to a person, a collision of transit vehicles, an evacuation for life safety reasons or any derailment of a transit vehicle, at any location, at any time, whatever the cause.

**Accountable Executive:** Typically, the highest executive in the agency. A single, identifiable person who has ultimate responsibility for carrying out the safety management system of a public transportation agency, and control or direction over the human and capital resources needed to develop and maintain the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

**Bipartisan Infrastructure Law:** Law enacted in 2021 intended to expand investment in national infrastructure. Transit safety requirements are further expanded in 49 U.S.C. 5329 to require the transit providers to develop a safety committee, expand upon safety risk reduction programs, increases in frontline safety training, and align internal programs with local and federal infectious disease prevention requirements.

**Chief Safety Officer:** An adequately trained individual who has responsibility for safety and reports directly to a transit department's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacity, unless employed by a department that is either a small public transportation provider, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

**Critical Incident:** An occurrence, natural or human-caused, that requires a response to protect life or property. Incidents can, for example, include major disasters, emergencies, terrorist attacks, terrorist threats, civil unrest, wildland and urban fires, floods, hazardous materials spills, nuclear accidents, aircraft accidents, earthquakes, hurricanes, tornadoes, tropical storms, tsunamis, war-related disasters, public health and medical emergencies, and other occurrences requiring an emergency response.

**Departmental Leadership and Executive Management:** Members of an agency who have authorities or responsibilities for day-to-day implementation and operation of an agency's safety management system.

**Designated Recipient:** An entity that has been designated by the state governor or his/her designee to receive and/or sub-allocate FTA funding.

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

**Event:** An accident, incident, or occurrence.

**Grant Pass-Through Agreement:** A non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program.

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

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

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

**Key Staff:** A group of staff and their direct reporting personnel that support the Accountable Executive, Chief Safety Officer or Safety Management System Executive in developing, implementing, and operating the department's safety management system.

**Major Mechanical Failure:** Failure caused by vehicle malfunction or subpar vehicle condition that requires that the vehicle be pulled out of service.

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

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

**Operator:** Provider of public transportation as defined under 49 U.S.C. 5302(14).

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

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

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

**Potential Hazard:** Any possible future condition that may cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock or infrastructure of a public transportation system; or harm to the environment.

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

**Public Transportation Agency Safety Plan:** The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and 49 CFR Part 673.

**Rail Fixed Guideway Public Transportation System:** Any fixed guideway system that uses rail, operates for public transportation, and serves within the jurisdiction of a state (and is not subject to the

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jurisdiction of the Federal Railroad Administration), or any such system undergoing engineering or construction. Rail fixed guideway public transportation systems include rapid rail; heavy rail; light rail; monorail; trolley; and inclined plane, funicular, and automated guideway.

**Reportable Event:** A safety or security event occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a maintenance facility or rail yard, during a transit related maintenance activity or involving a transit revenue vehicle. The following types of events are excluded from reporting requirements: events that occur off transit property where affected persons, vehicles, or objects come to rest on transit property after the event; OSHA events in administrative buildings; deaths that are a result of illness or other natural causes; other events occurring at bus stops or shelters that are not on transit-controlled property; collisions that occur while travelling to or from a transit-related maintenance activity; and collisions involving a supervisor car or other transit service vehicle operating on public roads.

**Risk:** The composite of predicted severity and likelihood of the potential consequences of hazards.

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

**Root Cause Analysis:** A systematic process for identifying root causes of safety events and an approach for responding to them.

**Safety Assurance:** The process within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation and the satisfaction of safety objectives through the collection, analysis, and assessment of information.

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

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

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

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

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

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

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

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

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

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

**Safety Risk Assessment:** Formal activity whereby a transit agency determines safety risk management priorities by establishing the significance or value of the safety risks.

**Safety Risk Management:** A process within a transit agency's safety plan for identifying hazards, assessing the hazards, and mitigating safety risk.

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

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

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

**Serious Injury:** Any injury that:

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

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

**State of Good Repair:** Condition in which a capital asset can operate at a full level of performance.

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

**Transit Agency:** An operator of a public transportation system.

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

**Vehicle Revenue Mile:** The miles that vehicles are scheduled to or travel while in revenue service. Vehicle revenue miles include layover/recovery time and exclude deadhead, operator training, vehicle maintenance testing and school bus and charter services.

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## Acronyms

ADOT Arizona Department of Transportation

CFR Code of Federal Regulations

CSO Chief Safety Officer

DASH Downtown Area Shuttle

FTA Federal Transit Administration

MAG Maricopa Association of Governments

NSP National Safety Plan

NTD National Transit Database

PTASP Public Transportation Agency Safety Plan

PTD Public Transit Department

RPTA Regional Public Transportation Authority

SMS Safety Management Systems

TI&I Transportation, Infrastructure and Innovation Subcommittee

U.S.C. United States Code

VMR Valley Metro Rail



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# 1. Plan Adoption and Certification

## 1.1 Plan Adoption

This Public Transportation Agency Safety Plan (PTASP) is approved by the Phoenix City Council and is hereby adopted, certified as compliant and signed by the Accountable Executive and the Chief Safety Officer:

_____ Jesus Sapien Accountable Executive	_____ Date	_____ Lars Jacoby Chief Safety Officer	_____ Date
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## 1.1 Certification of Compliance

The city of Phoenix certified on *INSERT DATE POST COUNCIL APPROVAL*, that this PTASP is in full compliance with 49 Code of Federal Regulations (CFR) Part 673, as required by 49 U.S.C. 5329, and is adopted and implemented by the city of Phoenix as evidenced by the Plan adoption signature and necessary Phoenix City Council approvals in **Appendix A** of this Plan.

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## 2. Introduction

The City of Phoenix Public Transit Department (PTD) originally prepared a Public Transportation Agency Safety Plan (PTASP) in 2020 to comply with the Federal Transportation Administration's (FTA) PTASP final rule 49 CFR Part 673. The rule requires public transportation system operators receiving federal Section 5307 funds to develop safety plans with processes and procedures that implement safety management system (SMS) principles and methods. The SMS includes the PTASP's Safety Management Policy Statement (SMP), Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP) policies and procedures that encompass a top-down and data-driven approach to safety risk management and ensuring the effectiveness of safety risk mitigation.

The 2022 PTASP revision is in response to new requirements that are part of the Building Infrastructure Law implemented in early 2022. The new requirements include the creation of a safety committee comprised equally of front-line and management employees, a standardized formula for determining annual safety performance targets, a new risk reduction program and the identification of ongoing training opportunities.

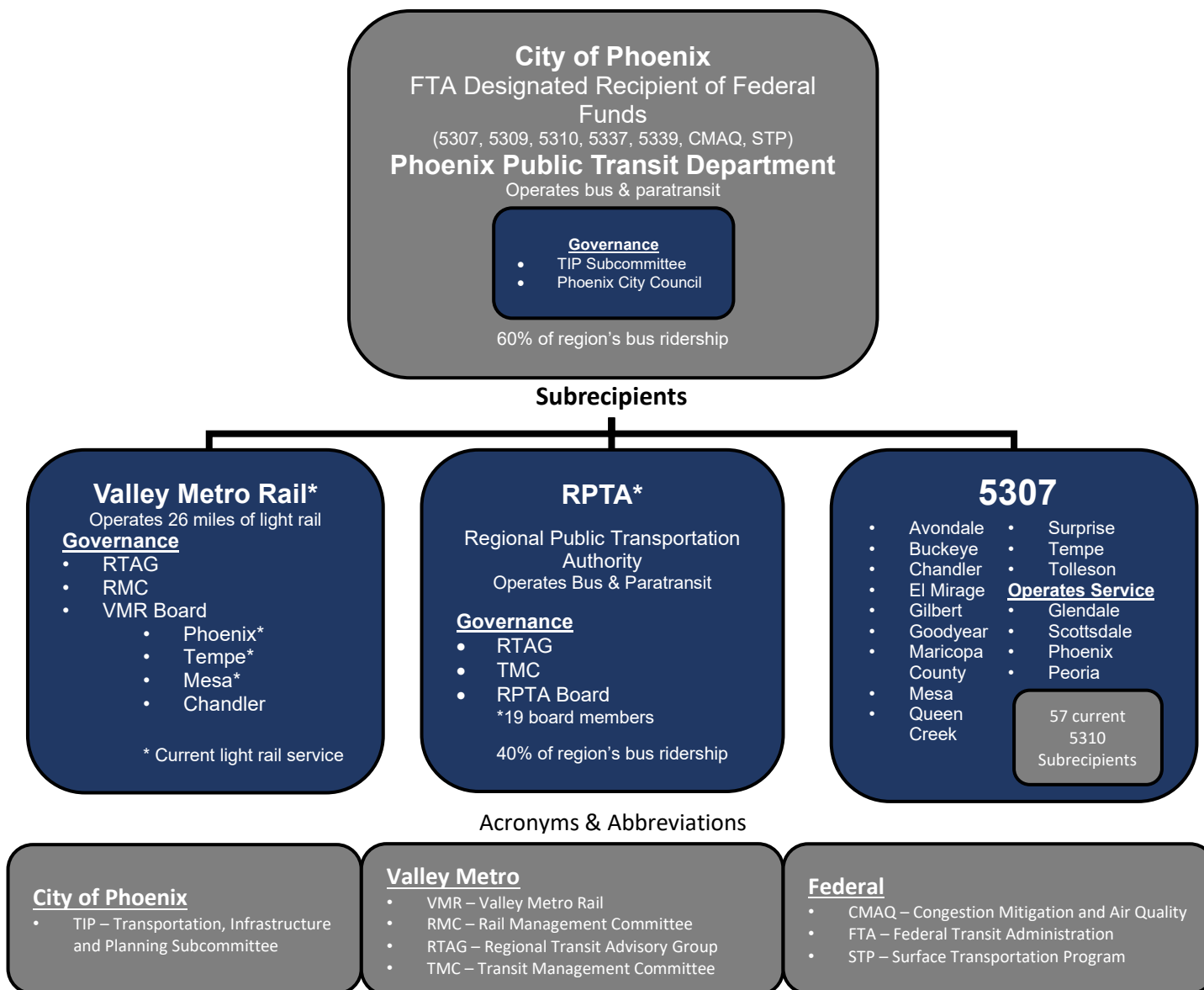
PTD operates fixed local bus service, neighborhood bus circulators, commuter bus service, and paratransit services in partnership with three Contractors: First Transit, Transdev and MV Transportation, which are all responsible for the day-to-day operations and maintenance, although PTD works individually with each contractor to ensure an effective safety program for the city's transit system.<sup>1</sup>

PTD is also part of an overall regional transit system in partnership with the Regional Public Transportation Authority (RPTA) and Valley Metro Rail (VMR). The City of Phoenix is the designated recipient of FTA funding for the Phoenix-Mesa Urbanized Area, and distributes funds to subrecipients including RPTA, VMR, Tempe, Mesa, Scottsdale, Glendale, Avondale, Fountain Hills, Peoria, Paradise Valley, Goodyear, Litchfield Park, Surprise, Tolleson, Youngtown, and unincorporated areas of Maricopa County. In addition, Glendale, Peoria, and Scottsdale operate bus transit service in their jurisdictions, and PTASP regulations also apply to those transit agencies. This complex regional relationship is illustrated on **Figure 2**.

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<sup>1</sup> This PTASP represents an overarching safety program for PTD's relationship with its bus transit service contractors and includes safety management as it also relates to PTD employees, particularly those employees in safety-sensitive positions. As such, the preponderance of PTD transit budget is contracted service (89% of PTD's budget is contracted services). No city employees are bus operators; the city does not provide maintenance, fueling or direct management of the contracted bus service. Where applicable, each section of this Plan includes the safety management processes and procedures of PTD and/or the safety management processes and procedures of the contractors. Contractors' abbreviated safety plans are included in Appendices B through D. Their full safety plans are referenced in each abbreviated plan and are available upon request.

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**Figure 2. Public Transit Department Regional Chart**

\*Note that the Valley Metro Rail and RPTA PTASPs are separate from this Plan. This Plan covers the PTD bus operations supported by First Transit, Transdev, and MV. The small transportation providers of Scottsdale, Glendale, and Peoria are all separate PTASPs.

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### 3. Safety Plan Regulatory Background

The FTA PTASP Final Rule (49 CFR Part 673.11(a)(3)) became effective July 19, 2019. The rule requires public transportation system operators receiving federal Section 5307 funds to develop safety plans with processes and procedures for implementing the SMS. The PTASP contains the following four SMS elements:

- **Safety Management Policy:** A documented commitment to safety that defines PTD's objectives, as well as the accountabilities and responsibilities of its employees in regard to safety.
- **Safety Risk Management:** An established and documented process for identifying, analyzing, assessing, and mitigating safety risks and hazards.
- **Safety Assurance:** A federally mandated process for safety performance monitoring and measurement. PTD is a large transit provider and therefore required to develop management of change and continuous improvement processes.
- **Safety Promotion:** A process for safety training and communication.

The PTASP also contains established safety performance targets for contracted service operators, including the process and timeline for conducting an annual PTASP review and update. Since the initial release of the PTASP, the Bipartisan Infrastructure Law (BIL), introduced further safety requirements, described in 49 U.S.C. 5329, elaborated upon within this document.

#### 3.1 Initial Certification and Implementation

In accordance with 49 CFR Part 673.13, PTD's Accountable Executive and the Phoenix City Council certified initial compliance with the PTASP requirements in 2020, which was then shared with the Arizona Department of Transportation (ADOT) and implemented by PTD staff and Contractors. PTD conducts annual certification of the implementation of the PTASP in compliance with 673.13(b)

#### 3.2 Plan Development and Annual Review

PTD requires Contractors to develop, annually update, and implement safety plans unique to each Contractor's system and scope of operation. The PTASP rule is also applicable to the PTD Contractors.

PTD is required to form a joint safety committee composed of the frontline and management staff, in equal parts. Following the annual revision of the PTASP, the Plan was then brought to the PTD Safety Committee for review and input prior to approval by the Phoenix City Council and signature by the Accountable Executive (defined below).

PTD coordinated with the Maricopa Association of Governments (MAG) as the MPO to collaborate on regional transit system performance targets in the PTASP.

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## 4. Transit Agency Information

### 4.1 General Information

#### General Agency Information

City of Phoenix  
Public Transit Department  
302 North 1st Avenue, Suite 900  
Phoenix, Arizona 85003  
Number of Employees: 115

#### Contractor Information (as of this writing)

##### Transdev

Number of Employees: 952  
Buses (40 and 60 foot): 330  
Circulator Cutaways: 10  
PTD Fiscal Year Revenue Miles:  
2018 - 14,924,290  
2019 - 15,191,569  
2020 - 13,878,353

##### First Transit

Number of Employees: 510  
Buses (40 and 60 feet): 159  
Circulator Cutaways: 6  
PTD Fiscal Year Revenue Miles:  
2018 - 6,453,377  
2019 - 6,274,901  
2020 - 6,810,813

##### MV Transportation

Number of Employees: 249  
Dial-A-Ride Cutaways: 123  
PTD Fiscal Year Revenue Miles:  
2018 - 322,914  
2019 - 331,731  
2020 - 288,763

Note: PTD's fiscal year is July 1 through June 30, each year.

#### Accountable Executive

Jesús Sapien  
Public Transit Director

#### Chief Safety Officer

Lars Jacoby  
Management Assistant II, Director's Office

#### Mode Applicability

Operated: Bus and Paratransit  
Plan Applicability: Bus and Paratransit

#### Types of Funding

Section 5307

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## 4.2 PTD Agency Description

The city of Phoenix purchased the Phoenix Transit System from a private company in 1971, and since then is responsible for overseeing the city's transit programs and serves as the designated recipient for federal funding under FTA's Section 5307, 5309, 5310, 5316, 5317, 5337 and 5339 programs in the Phoenix-Mesa Urbanized Area. PTD's service area is 518 square miles, consisting of a population of approximately 1.7 million people. PTD contracts the operation of the city's transit network of:

- 38 local fixed routes (First Transit [11 routes] and Transdev [27 routes])
- Four circulator routes (First Transit [1 route] and Transdev [3 routes])
- Six RAPID (commuter bus) routes (Transdev)
- Phoenix Dial-A-Ride paratransit service (MV Transportation).

In addition to managing FTA grants subrecipients, PTD is responsible for ensuring compliance with federal rules and guidelines for itself and the region's subrecipients. Each subrecipient signs a Grant Pass Through Agreement with PTD for the receipt of FTA funds to support its operations. Per 49 U.S.C. 5329(d)(4)(B), PTD and its subrecipients are required to utilize .75% of 5307 for risk reduction programs.

### CITY OF PHOENIX CONTRACTORS

**First Transit** operates 11 local and one circulator routes from the city's West Transit Facility. For additional information, see the First Transit Abbreviated Safety Plan (**Appendix B**).

**Transdev** operates 27 local, six RAPID, and three circulator routes. Transdev operates from the city's North and South Transit Facilities. For additional information on Transdev, see the Transdev Abbreviated Safety Plan (**Appendix C**).

**MV Transportation** operates the Phoenix Dial-A-Ride paratransit service for persons with disabilities certified under the Americans with Disabilities Act of 1990 guidelines. The company operates from an operator-leased facility.

To supplement Dial-A-Ride, PTD's Alternative Transportation Programs are also provided by MV Transportation for transportation assistance via taxi vouchers and to operate a shuttle service for seniors and persons with disabilities or are receiving dialysis treatment. For additional information on MV Transportation, see the MV Transportation Abbreviated Safety Plan (**Appendix D**).

### OTHER AGENCIES of PTD

PTD provides FTA funding for two transit agencies and three small transit agencies as subrecipients: RPTA, VMR, city of Scottsdale, city of Glendale, and city of Peoria respectively (see **Figure 2**). Each transit agency maintains a standalone PTASP for their respective programs.

RPTA is overseen by a board of elected officials from member agencies, including Avondale, Buckeye, Chandler, El Mirage, Gilbert, Glendale, Goodyear, Maricopa County, Mesa, Peoria, Phoenix, Scottsdale, Surprise, Tempe, Tolleson and Wickenburg. RPTA is responsible for transit marketing and financial management of the transit component of the Maricopa County regional transportation program. RPTA also contracts for the operation of the local and commuter bus and paratransit services it operates outside of Phoenix.

VMR is a non-profit, public corporation that is responsible for the design, construction and operation of the 26-mile light rail system and future extensions. The board includes representatives from the member



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cities of Chandler, Mesa, Phoenix and Tempe. The light rail system currently serves Phoenix, Tempe, and Mesa.

ADOT is the state's agency responsible for planning, building and operating the highway system, as well as building and maintaining bridges and the operation of the Grand Canyon Airport. ADOT serves as the State Safety Oversight Agency for VMR within PTD.

MAG serves the metropolitan Phoenix area as the regional Metropolitan Planning Organization (MPO) for Maricopa County and its 27 member cities and agencies. As the MPO, it is responsible for coordinating with each public transportation provider in the development and review of their safety performance targets (SPT) for planning purposes.

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## 5. Safety Plan Development and Maintenance

### 5.1 PTASP Development

The PTASP was written and reviewed by PTD subject matter experts and a third-party consultant to ensure it meets current safety industry standards and follows 49 CFR Part 673 and 49 U.S.C. 5329.

Through its written agreements with multiple service providers, PTD requires Contractors to develop and implement safety plans unique to their respective scope of operations, while providing oversight and input to ensure compliance. Throughout each process, each Contractor develops and implements safety plans that address safety needs.

The PTASP goes through a formal approval process:

1. Internal transit agency safety committee review and concurrence.
2. Transportation, Infrastructure and Planning (TIP) Subcommittee – a four-member subcommittee of the Phoenix City Council that provides policy guidance on a range of issues, including transit.
3. Phoenix City Council – Comprised of nine members (the Mayor and eight Council members), who provide approval and direction on policies and initiatives citywide.

### 5.2 Annual Internal Review and Update Process

#### 5.2.1 PTD

PTD management and staff will review the PTASP on an annual basis prior to December 31 of each year and make updates to the plan as necessary. Review of the PTASP along with any subsequent updates, addendums, adoption, and distribution activities will be documented in the PTASP Activity Log (**Appendix E**) and tracked through the date and version provided in the header on the individual pages. Approval of each updated Plan will be completed by the Accountable Executive, the Chief Safety Officer (CSO) and the Phoenix City Council; and self-certification will be completed annually by the Accountable Executive and CSO in compliance with 49 CFR Part 673.13.

#### 5.2.2 Contractors

At a minimum, Contractors are required to update their plans annually. Each Contractor has developed their own review process and will submit updates to PTD.

For more details on each contractor's *safety plan review and update process*, see:

- **First Transit – Appendix B.2** (Plan Development, Approvals, and Updates)
- **Transdev – Appendix C.5.1.3** (Agency Safety Plan Review Process)
- **MV Transportation – Appendix D.2** (Plan Development, Approvals, and Updates)

### 5.3 PTASP Audit Process

Following PTD's annual review and update process, PTD will consult with third-party subject matter experts for independent auditing of the PTD PTASP. Reviews of its three service contractors will occur on a biennial basis. The auditor will ensure the plan's compliance with 49 CFR Part 673 and any accompanying mandates.

In addition, the VMR and RPTA PTASPs will be independently audited annually, while the Glendale, Scottsdale, and Peoria PTASPs will be audited triennially.

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## 5.4 PTASP Documentation and Recordkeeping

### 5.4.1 PTD

PTD will maintain the documents set forth in the PTASP, including those documents related to implementation of the SMS (in tandem with operations contractors) and results from SMS processes and activities.

PTD will also maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that PTD uses to carry out the PTASP and all iterations of those documents. These documents will be made available upon request to FTA or other federal entity, or ADOT. PTD will, at a minimum, retain these documents as outlined in the federal and local records retention policies and schedules or for three years, as required in 49 CFR Part 673.31. Such materials may include:

- Safety Committee meeting agendas and notes;
- Proficiency and rules compliance checks;
- Employment records;
- Safety bulletins;
- Preventive and corrective maintenance records;
- Training records; and
- Event investigations

Accident and incident investigations

### 5.4.2 Contractors

Each Contractor maintains individual policies on safety-related documentation and recordkeeping for no less than three years. All Contractors are committed to maintaining documents and records related to their plans, including the safety plan itself and other associated safety records and documentation. For more information about each Contractor's *policy on documentation and recordkeeping*, see:

- **First Transit – Appendix B.3** (Annual Review and Update of the Public Transportation Safety Plan)
- **Transdev – Appendix C.2 - Transdev** (Safety Plan Documentation and Recordkeeping)
- **MV Transportation – Appendix D.3** (Annual Review and Update of the Public Transportation Safety Plan)

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## 6. Safety Performance Targets

The PTASP Final Rule requires public transportation providers to develop a PTASP that includes safety performance targets based on the seven safety performance measures established under the FTA's National Public Transportation Safety Plan (NSP). The safety performance measures outlined in the NSP, which are based on data currently being submitted to the National Transit Database (NTD), are developed to ensure applicability to all modes of public transportation and are based on data submitted using the NTD and are each listed as categories in **Table 1** and **Table 2**. The SPTs are developed based on a three-year rolling average. The NTD is maintained by FTA and serves as a reporting system for public transit information tracking, such as agency funding sources, inventories of assets, safety reports and measures of transit service. The safety performance measures included in the NSP are fatalities, injuries, safety events and system reliability.

Given that PTD does not directly operate the Phoenix transit system or other operations in the region, the safety performance baselines and targets presented in the PTASP are established and directly monitored by Contractors across the region.

Each Contractor baseline was established as the actual safety performance value recorded at the end of the federal fiscal year 2019, except for 'System' Reliability, which is a contractual performance target. All safety performance metrics use the federal fiscal calendar, which begins October 1 and ends on September 30.

A record of prior safety performance baselines and targets are found in the PTASP Performance Target Log (**Appendix F**).

**Table 1** and **Table 2** present the safety performance baselines and targets for bus service and paratransit service, respectively.

**Table 1. Bus Service Safety Performance Baseline and Targets**

MB (per 100,000 VRM)							
Mode - MB	Fatalities	Rate* of Fatalities	Injuries	Rate* of Injuries	Safety Events	Rate* of Safety Events	Mean Distance Between Mechanical Failure
2019 Actual	0	0.00	39	0.18	71	0.32	19,810
2020 Actual	0	0.00	35	0.17	105	0.51	15,241
2021 Actual	5	0.02	51	0.25	157	0.78	18,365
Average	1.67	0.01	42	0.20	111	0.54	17,805
2023 SPT (MB)	1.67	0.01	42	0.20	111.00	0.54	17,805

**Table 2. Paratransit Service Safety Performance Baseline and Targets**

DR (per 100,000 VRM)							
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Mode - DR	Fatalities	Rate* of Fatalities	Injuries	Rate* of Injuries	Safety Events	Rate* of Safety Events	System Reliability
2019 Actual	0	0.00	1	0.03	1	0.03	18,989
2020 Actual	0	0.00	0	0.00	2	0.07	22,554
2021 Actual	0	0.00	1	0.03	2	0.06	19,036
Average	0	0	0.67	0.02	1.67	0.06	20,193
2023 SPT (DR)	0	0	0.67	0.02	1.67	0.06	20,193

\*rate = total number for the year/total revenue vehicle miles traveled

**Tables 1 and 2 definitions:**

- **Fatality:** A death or suicide confirmed within 30 days of a reported event. Does not include deaths in or on transit property that are a result of illness or other natural causes.
- **Injury:** Any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene.
- **Safety Event:** A collision, derailment, fire, hazardous material spill, act of nature (Act of God), evacuation or OSONOC (other safety occurrence not otherwise classified) occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle that meets the established NTD reportable thresholds.
- **System Reliability:** The rate of vehicle failures in service, defined as mean distance between major mechanical failures.

## 6.1 Accident and Assault Reduction Strategies

These SPTs are set to works towards a reduction of vehicular and pedestrian accidents involving buses. In order to reduce such events, PTD and its contractors will utilize the SRM process, spelled out in [section 7.7](#). Mitigations that may be taken to reduce events may include 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. Additionally, per 49 U.S.C. 5329(d)(1)(I)(ii), PTD has and will continue to take measures to mitigate assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on buses. Barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators have already been installed regionally. To conduct this review, the PTD Safety Committees will conduct risk analyses to determine if such physical mitigations are necessary to reduce assaults and injuries to transit workers. See further details on the overall risk assessment and mitigation process in [sections 7.7 and 7.8](#).

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## 7. Safety Management Systems

### 7.1 Safety Management Policy – 673.23(a)

#### 7.1.1 PTD

The city of Phoenix is committed to safety management as a systematic, comprehensive, and ongoing approach to identifying hazards and risks associated with transit system operations, facilities and related preventive maintenance activities. The PTD Safety Management Policy (SMP) is the first layer of its commitment to the SMS framework.

PTD adopted an SMS framework as an element of its responsibility by establishing:

- A safety management policy
- Identifying hazards and controlling risks
- Goal setting, planning, and measuring performance.

PTD recognizes that the management of safety is a core value. PTD is committed to providing safe and reliable transportation to the communities it serves. The management team of PTD will embrace the SMS and is committed to developing, implementing, maintaining, and constantly improving processes to ensure safety. As SMS is a top-down method for instituting safety practices throughout the agency, all levels of management and frontline employees are committed to safety and understand that safety is the primary responsibility of all employees. As necessary, PTD will plan to develop plans, procedures, structures, and resources to support the implementation of SMS within the agency. PTD is committed to performing the following activities to implement SMS and this PTASP:

- Communicate the purpose and benefits of the SMS to all staff, managers, supervisors, and employees through Safety Promotion activities. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.
- Provide appropriate management involvement and the necessary resources to establish an effective employee safety reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identify hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.
- Ensure that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.
- Establish Safety Performance Targets (SPTs) that are realistic, measurable, and data driven.
- Continual improvement of safety performance through management processes that ensure appropriate safety management action is taken and is effective.
- Ensure the SMP is signed by highest executive in the agency to convey that SMS is important to the highest level of the organization.
- Provide resources for managing safety during service delivery.
- Convey to employees and agency stakeholders that receiving safety information is critical to the operation and success of the SMS.
- Ensure that the PTD's strategies and guidelines to address infectious disease planning and response is consistent with the Centers for Disease Control and Prevention and the Arizona and local health authorities in order to minimize exposure to infectious diseases in accordance with 49 USC section 5329 (d)(1)(D).

PTD also follows safety management policies as directed in the city of Phoenix's safety program outlined in Administrative Regulation 2.31 (AR 2.31). See the City of Phoenix Administrative Regulations ([Appendix G](#)).



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#### **7.1.1.1 Communicating the Policy Throughout the Agency**

##### **PTD**

PTD is committed to ensuring the safety of our passengers, personnel, and operations. Part of that commitment is developing an SMS and agencywide safety culture that reduces agency risk to the lowest level possible. The first step in developing a full SMS and agencywide safety culture is communicating the SMP throughout the agency and to the Contractors. The SMP and safety objectives are at the forefront of all communications within the Department. This communication strategy will include posting the policy in prominent work locations for existing employees and adding the policy statement to the on-boarding material for all new employees. The signed PTASP serves as the Accountable Executive's endorsement of the SMP and the Council's adoption of the Plan and SMP.

Methods used to communicate the safety management policy include the following:

- Safety presentations at PTD staff meetings.
- Annual safety training with key PTD staff.
- PTASP and safety training information uploaded to PTD's employee-accessible SharePoint site.

Additionally, PTD oversees the contracted transit providers to ensure that they are providing adequate information on not only their respective SMPs, but also PTD's overarching PTD to ensure it aligns with the Department's SMS values.

#### **7.1.2 Contractors**

Each Contractor has adopted their own SMPs that are compliant with 49 CFR Part 673 and are complementary to PTD's policy.

For specific details regarding each contractor's *safety management policy*, see:

- **First Transit – Appendix B.5** (Safety Management Policy)
- **Transdev – Appendix C.4** (Safety Policy Statement)
- **MV Transportation – Appendix D.4** (Safety Management Policy)

##### **Contractors**

PTD Contractors have included a SMP Communication section in their safety plans regarding their communications to their staff. The Contractors plan to communicate safety information to their employees by creating accessible safety reports, implementing training programs, posting information on general bulletin boards, and sending safety emails.

For more information on each Contractor's individual *policies related to safety communication*, see:

- **First Transit – Appendix B.5** (Safety Management Policy Communication)
- **Transdev – Appendix C.4** (Communication)
- **MV Transportation – Appendix D.4** (Safety Management Policy Communication)

#### **7.2 State and Metropolitan Planning Organization Coordination**

The city of Phoenix makes its SPTs available to ADOT and the MPO, Maricopa Association of Governments (MAG), to aid in those agencies' respective regional and long-range planning processes. To the maximum extent practicable, PTD coordinates with ADOT and MAG in the selection of the SPTs.

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Each year during the FTA Certifications and Assurances reporting process, PTD will transmit any updates to its SPTs to both the MAG and ADOT (unless those agencies specify another time in writing).

### 7.3 Safety Goals

To address the ongoing oversight and review required to ensure the proper implementation of this plan, the following safety goals are set:

- Establish a safety and training committee with key frontline and management representatives from PTD to review policies and procedures related to the PTASP, per 49 U.S.C. 5329(d)(1)(A).
- Encourage and improve safety communication strategies and awareness with both internal and external stakeholders.
- Identify roles and responsibilities for the transit system's safety program and develop a training curriculum.
- Strive for continuous improvement in all SMS-related activities across PTD.

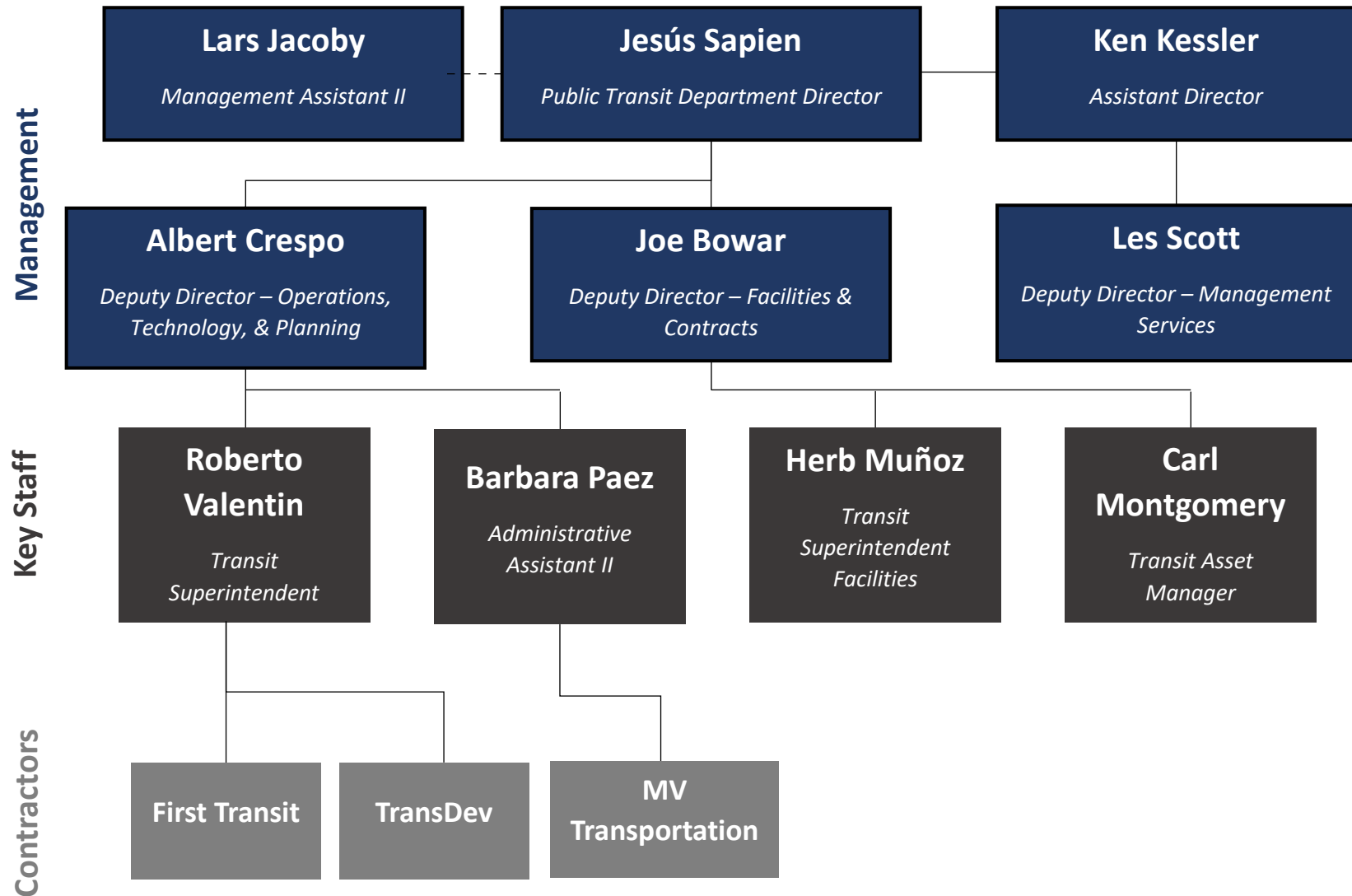
### 7.4 Authorities, Roles and Responsibilities

#### 7.4.1 PTD

The key to a successful safety plan is fostering a culture focused on safety. With this philosophy in mind, all PTD employees are responsible for implementing the safety practices and being safe every day.

**Figure 3** illustrates the organizational structure for PTD's SMS. **Table 3** defines the specific responsibilities and accountabilities each role has in achieving safety targets, program oversight, and implementation.

**Figure 3. City of Phoenix Public Transit Department Safety Organizational Chart**



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**Table 3. Safety Roles and Responsibilities**

Role	Name of Staff Member	Safety Responsibilities
Public Transit Department Director  Accountable Executive  Management	Jesús Sapien	<ul style="list-style-type: none"> <li>• Ensure compliance with FTA's safety policies.</li> <li>• Oversee the Plan for PTD.</li> <li>• Control and direct staff and capital resources needed to create and maintain the PTASP.</li> <li>• Create a safety-oriented culture across the Department.</li> <li>• Work with the CSO to monitor safety performance.</li> <li>• Ensure that PTD's Contractors are working toward achieving the safety performance targets.</li> <li>• Periodically review customer comments related to safety concerns.</li> </ul>
Management Assistant II - Director's Office  Chief Safety Officer	Lars Jacoby	<p><i>Chief Safety Officer</i></p> <ul style="list-style-type: none"> <li>• Promote safety awareness throughout the organization.</li> <li>• Ensure that safety documentation and training are current.</li> <li>• Communicate changes in safety processes to all applicable personnel.</li> <li>• Monitor the effectiveness of corrective actions.</li> <li>• Provide periodic reports on safety performance.</li> <li>• Render independent advice to managers and other personnel on safety-related matters as needed.</li> <li>• Ensure that safety is a high priority throughout the organization.</li> <li>• Review customer comments related to safety concerns.</li> <li>• Work with other divisions within PTD to implement safety practices.</li> <li>• Promote a safety culture across the Department and to contractors.</li> <li>• Provide oversight of contractor safety plans through periodic reviews and audits.</li> <li>• Provide oversight of contractor, RPTA, VMR, Scottsdale, Glendale, and Peoria safety plans through periodic reviews and formal internal audits.</li> </ul>

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Role	Name of Staff Member	Safety Responsibilities
Deputy Director - Facilities & Contracts  Management	Joe Bowar	<i>Deputy Director – Facilities</i> <ul style="list-style-type: none"> <li>• Ensure transit facilities are well-maintained and meet state of good repair requirements.</li> <li>• Implement hazard mitigation strategies related to transit infrastructure.</li> <li>• Collaborate with other divisions to address safety concerns related to facilities and operations.</li> <li>• Review customer comments related to safety concerns.</li> <li>• Communicate safety practices and policies to staff in the Division.</li> </ul>
Deputy Director - Operations, Technology & Planning  Management	Albert Crespo	<ul style="list-style-type: none"> <li>• Communicate safety practices and policies to staff within the Division.</li> <li>• Ensure Contractor compliance with their safety plan, policies, and training requirements and internal PTD safety programs.</li> <li>• Collaborate with other divisions to address safety concerns related to operations and facilities.</li> <li>• Review customer comments related to safety concerns.</li> </ul>
Assistant Director  Management	Ken Kessler	<ul style="list-style-type: none"> <li>• Communicate safety practices and policies to staff within the Division.</li> </ul>
Deputy Director - Management Services  Management	Les Scott	<ul style="list-style-type: none"> <li>• Communicate safety practices and policies to staff within the Division.</li> </ul>

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Role	Name of Staff Member	Safety Responsibilities
Transit Superintendent (Operations, Technology & Planning)  Key Staff	Roberto Valentin	<ul style="list-style-type: none"> <li>• Supervise the contract monitoring for bus service Contractors: First Transit and Transdev.</li> <li>• Respond to and communicate safety concerns with bus service Contractors and vice versa back to PTD.</li> <li>• Ensure bus service Contractors implement their safety plan and related policies and training as well as uphold PTD's overall SMP.</li> <li>• Track safety performance for bus Contractors.</li> <li>• Monitor the quality of maintenance and repairs performed by Contractors on vehicles owned by PTD.</li> <li>• Oversee the inspection of all transit vehicles for safety and direct corrective action.</li> <li>• Review all customer comments related to safety concerns.</li> </ul>
Administrative Assistant II (Operations, Technology & Planning)  Key Staff	Barbara Paez	<ul style="list-style-type: none"> <li>• Serve as the contract monitor for the paratransit service Contractor: MV Transportation.</li> <li>• Respond to and communicate safety concerns with paratransit service Contractor.</li> <li>• Ensure paratransit service Contractor implements their safety plan and related policies and training as well as the PTD SMP.</li> <li>• Track safety performance of the paratransit service Contractor.</li> <li>• Review all customer comments related to safety concerns.</li> </ul>
Transit Superintendent (Facilities & Contracts)  Key Staff	Herb Muñoz	<ul style="list-style-type: none"> <li>• Oversee maintenance at all transit facilities.</li> <li>• Inspect transit facilities for safety issues and recommend corrective action.</li> <li>• Incorporate safety requirements for contractors in on-site contracted maintenance and repairs.</li> <li>• Review customer comments related to safety concerns at facilities.</li> </ul>



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Role	Name of Staff Member	Safety Responsibilities
Transit Asset Manager (Facilities & Contracts)  Key Staff	Carl Montgomery	<ul style="list-style-type: none"> <li>Manage PTD's Transit Asset Management Plan.</li> <li>Provide oversight and technical assistance to regional partners with their own Transit Asset Management Plans.</li> <li>Oversee the State of Good Repair program.</li> </ul>
Contractors	<p><b>First Transit</b></p> <ul style="list-style-type: none"> <li>Jesse Saavadra, Location General Manager</li> <li>Adrian Green, Location Safety Manager</li> </ul> <p><b>MV Transportation</b></p> <ul style="list-style-type: none"> <li>Thomas Egan, General Manager</li> <li>Andrew Higuera,</li> <li>Area Safety Manager</li> </ul> <p><b>Transdev</b></p> <ul style="list-style-type: none"> <li>Rob Killebrew, General Manager</li> <li>Jackie Hampton, Director of Safety and Training</li> </ul>	<ul style="list-style-type: none"> <li>Update PTASPs for compliance with federal regulations.</li> <li>Update PTASPs as necessary in response to safety issues and provide training to facilitate those changes to the safety plan.</li> <li>Perform regular safety checks.</li> <li>Implement safety policies applicable to operating and maintaining transit vehicles and maintaining a safe work environment.</li> <li>Report and investigate safety hazards and safety events.</li> <li>Implement and track regular safety training for employees.</li> <li>Receive employee and customer comments related to safety concerns.</li> </ul> <p>See <b>Appendices B</b> through <b>D</b> for specific safety practices of each Contractor.</p>

#### 7.4.2 Contractors

Each of the Contractors have identified authorities, roles and responsibilities related to safety within their individual organizations and are responsible for also upholding the PTD SMP and overall PTASP. As part of their safety plans, Contractors identified a respective CSO, an Accountable Executive, as well as supporting safety staff. For each role, the Contractors specify the responsibilities that each person has related to safety.

For specific details on each Contractor's *authorities, roles, and responsibilities*, see:

- **First Transit – Appendix B.5** (Authorities, Accountabilities, and Responsibilities)
- **Transdev – Appendix C.4** (Safety Accountability and Responsibility)
- **MV Transportation – Appendix D.4** (Authorities, Accountabilities, and Responsibilities)

### 7.5 Employee Safety Reporting Program

#### 7.5.1 PTD

Reporting safety observations and safety events is an important part of every employee's role in creating a safe environment. PTD encourages all employees to report potential hazards and any safety events that occur through the safety reporting program. The safety reporting program includes anonymous contact methods such as the city of Phoenix employee-wide integrity hotline (602-262-7555, or email [hrc@phoenix.gov](mailto:hrc@phoenix.gov)), in addition to the PTD employee exclusive work order hotline (602-495-7011) that provides contact information for safety observations and safety events to be communicated to appropriate

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PTD staff. PTD management also maintains an open-door policy allowing for prompt communication of safety concerns.

PTD utilizes the MPulse work order system to aid in communicating potential safety issues in the transit system. The MPulse program is a computerized work order maintenance management system that centralizes data, organizes maintenance data and facilitates the processes of maintenance operations. Safety issues can be entered into MPulse for mitigation and resolution. Identified PTD staff and contractors are notified by either email, the Work Order line or in person. The issue(s) are then entered into MPulse as a request for service and tracked through closure.

MPulse tracks the operation and inventory of assets such as equipment, vehicles, machinery, and facility infrastructure. Asset data that are collected via the MPulse program are utilized to determine the transit system's state of good repair condition and potential future asset replacement needs.

For more information on the PTD safety reporting program, see Administrative Regulation 1.2 (Fraud Prevention and Reporting Policy [Integrity Line]) ([Appendix G](#)).

### **7.5.2 Contractors**

Each Contractor has developed and documented an Employee Safety and Reporting Program as a part of their individual safety plan and maintain an open door policy for safety concerns. Contractors additionally utilize their own systems for reporting safety concerns.

For specific information on each Contractor's *employee safety reporting program*, see:

- **First Transit – Appendix B.5** (Employee Safety Reporting Program)
- **Transdev – Appendix C.4** (Employee Safety Reporting)
- **MV Transportation – Appendix D.4** (Employee Safety Reporting Program)

## **7.6 Administrative Regulation Reporting Policy**

### **7.6.1 PTD**

PTD is committed to providing a safe transit operating environment. To achieve this, PTD maintains unrestricted and confidential reporting of all incidents and occurrences that may compromise the safe conduct of operations. Every employee is responsible for the communication of any information that may affect the integrity of transit safety to management as outlined in AR 2.31 ([Appendix F](#)).

The department's management hold the primary responsibility for providing and maintaining a safe workplace. Any safety problems that are beyond the supervisor's control shall be reported to management immediately upon detection as outlined in AR 2.31 ([Appendix F](#)).

PTD will not retaliate or take punitive actions in any way against an employee, applicant, or former employee who, in good faith, makes a complaint, safety report or report of discrimination/harassment or participates in the investigation of such complaint or report. This policy shall not apply to information that involves an illegal act, or a deliberate or willful disregard of promulgated regulations or procedures.

The PTD method of collecting, recording, and disseminating information obtained from transit safety reports is intended to protect, to the extent permissible by law, the identity of any employee who provides transit safety information and wishes to remain anonymous.

For further information on PTD's reporting policies, refer to the City of Phoenix Administrative Regulations ([Appendix F](#)).

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### 7.6.2 Contractors

Each Contractor has their own administrative regulation reporting policy. All Contractors strive to deliver safe transit service and to accomplish this each Contractor has developed its own system to encourage employees to report safety incidents and observations and determine the necessary actions that need to be taken following an incident.

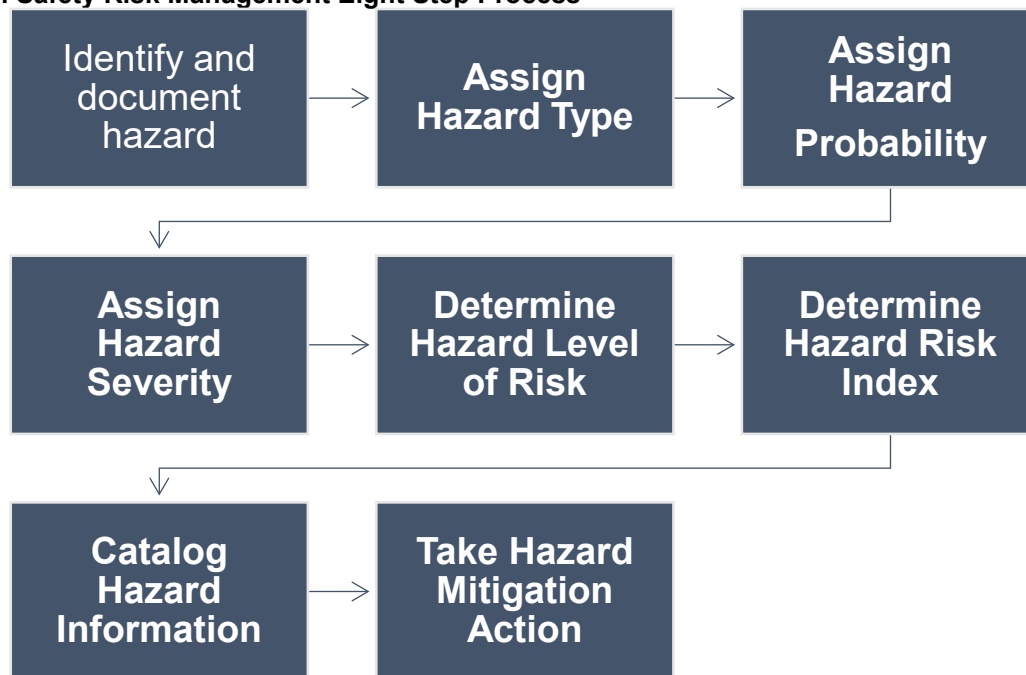
For more details on each Contractor's *Administrative Regulation Reporting Policy*, see:

- **First Transit – Appendix B.5** (Employee Safety Reporting Program)
- **Transdev – Appendix C.4** (Employee Safety Reporting)
- **MV Transportation – Appendix D.4** (Employee Safety Reporting Program)

## 7.7 Safety Risk Management

The SRM process is a process that aims to provide a standard method for identifying, assessing, and mitigating safety hazards in the bus transit system as defined in the NSP (**Figure 4**). Descriptions of each step are detailed in the following sections. The risk management process allows for careful examination of hazards, assessment of existing mitigation sufficiency, and the determination of additional mitigation measures.

**Figure 4. Safety Risk Management Eight Step Process**



### 7.7.1 Safety Hazard Identification

#### 7.7.1.1 PTD

An effective hazard identification program is fundamental to safety management.

PTD's safety risk management process starts with an effort to proactively identify safety hazards that could result in negative safety outcomes.

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The first step of the safety risk management process is visualized in the hazard identification and documentation flow chart (**Figure 5**).

First, upon receiving communication from the on-site staff of a potential hazard, the supervisor communicates the hazard to the division safety representative or the CSO for review and formal documentation.



**Figure 5. Hazard Identification and Documentation (Step 1)**

Hazard identification focuses on conditions that need special attention or immediate action, including new procedures or training to resolve the condition. PTD uses a variety of mechanisms for identifying and documenting hazards, namely:

- Through training and reporting procedures, PTD ensures employees can identify hazards and that each employee understands the responsibility to report any safety hazards to the employee's supervisor or the safety representative. Continued refresher training helps employees improve skills to identify hazards as outlined in AR 2.31 ([Appendix F](#)).

This regulation outlines the responsibility of supervisors to keep informed on safety subjects through training courses, and employees to attend all job required safety training and refresher courses as needed. The regulation also sets operational procedures to ensure employees receive and document the appropriate safety and health training.

- In an effort to identify potential hazard recurrence, PTD uses incident reports and records to determine specific areas of training, whether individually or for a group or common classification, that need to be covered with employees.
- Incident reports are analyzed by safety staff to identify recurring patterns, as well as known patterns or themes that would help identify underlying hazards and root causes of the event to mitigate or prevent recurrence.

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- To increase safety knowledge, staff is encouraged to participate in professional development activities, including peer-to-peer exchanges, which are a source to share information on lessons learned and best practices.

Other sources for hazard identification include:

- Employee safety reporting program
- State of Good Repair reports
- Trend analysis of personnel job performance, vehicles, facilities, and other data
- Investigations of safety events
- Lessons learned from root cause analysis after safety incidents
- Safety trend analysis on data currently collected
- Training and evaluation records
- Internal safety audits

External sources of hazard information could include:

- FTA and other federal, state, county, or city authorities, including peer transit agencies
- Reports from the public
- Safety bulletins from manufacturers or industry associations

Following the identification of the safety hazard, the second step of the risk management process determines the hazard by type – organizational, technical or environmental – to assist in identifying the expertise needed to assess the hazard.

Hazard types are also categorized by subcategory as shown in the Safety Hazard Type Identification chart in **Table 4**. For example, organizational hazards can be further detailed in a subcategory as either a resource, procedural, training, or supervisory hazard. Each subcategory helps later define the different types of mitigation strategies and potential effects of the safety hazard in the following steps.

**Table 4. Safety Hazard Type Identification (Step 2)**

Organizational	Technical	Environmental
Resourcing	Operational	Weather
Procedural	Maintenance	Natural
Training	Design	
Supervisory	Equipment	

Hazard types may be defined using the following descriptions:

- Organizational
  - Resourcing – A hazard that is related to the supply of resources.
  - Procedural – A hazard that is linked to established procedures.
  - Training – A hazard that is related to inadequate or incomplete training.
  - Supervisory – A hazard that is related to ineffective supervision.

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- Technical
  - Operational – A hazard that relates to standard operations.
  - Maintenance – A hazard that is linked to asset maintenance.
  - Design – A hazard that is related to inadequate design.
  - Equipment – A hazard that is linked to inappropriate, incorrect, or faulty equipment.
- Environmental
  - Weather – A hazard that is linked to unfavorable weather conditions.
  - Natural – A hazard that is related to unfavorable natural environmental conditions.

In the third step of the safety risk management process, the hazard's probability is then identified by matching the hazard to each probability description shown in the Safety Hazard Risk Probability chart in **Table 5**.

**Table 5. Safety Hazard Risk Probability (Step 3)**

Probability	Criteria
Frequent	A hazard that is likely to occur frequently,
Probable	A hazard that is likely to occur several times.
Occasional	A hazard that is likely to occur sometime.
Remote	A hazard that is likely to occur sometime.
Improbable	A hazard that is so unlikely that it can be rejected from consideration.
Eliminated	A hazard that is incapable of occurrence.

In the fourth step of the safety risk management process, the hazard's severity can then be categorized with the use of the Safety Hazard Risk Severity Categories chart in **Table 6** by comparing the hazard to the listed severity criteria.

**Table 6. Safety Hazard Risk Severity Categories (Step 4)**

Severity	Criteria
Catastrophic	A hazard that may cause death or system loss.
Critical	A hazard that may cause severe injury, severe occupational illness, or major system damage.
Marginal	A hazard that may cause minor injury, minor occupational illness, or minor system damage.
Negligible	A hazard that may cause less than minor injury, occupational illness, or system damage.
Insignificant	Operating conditions are such that human error, subsystem or component failure or procedural deficiencies will result in no injury, none or minor damage to equipment, no adverse reputational damage.

#### **7.7.1.2 Contractors**

To identify safety hazards, Contractors hold monthly safety meetings and facility inspections to identify safety risks and determine if prior issues and risks had been addressed. In addition to these practices,

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Contractors encourage employees to report safety observations to management so they can be assessed and mitigated before an incident occurs.

For more detail about each Contractor's *individual policies and procedures for safety hazard identification*, see

- **First Transit – Appendix B.6** (Safety Risk Management)
- **Transdev – Appendix C.5** (Safety Hazard Identification)
- **MV Transportation – Appendix D.5** (Safety Risk Management)

## 7.7.2 Safety Risk Assessment

### 7.7.2.1 PTD

Identified hazards are assessed to determine the potential consequences of each hazard. Factors that are used in assessing safety hazards are:

- probability of occurrence
- severity of the consequences should there be an occurrence
- level of exposure to the hazard

In the fifth step of the safety risk management process, the Risk Assessment Matrix (**Table 7**) takes identified hazards and assesses the level of risk based on the hazard's probability and severity of the hazard's consequences. The results of the risk assessment matrix process aids in determining whether the risk should be managed, controlled, or eliminated in the following safety risk management steps.

**Table 7. Safety Hazard Risk Assessment Matrix (Step 5)**

Bus Transit Agency					
HAZARD RISK INDEX					
Probability	Severity				
	1	2	3	4	5
	Catastrophic	Critical	Marginal	Negligible	Insignificant
(A) Frequent	1A	2A	3A	4A	5A
(B) Probable	1B	2B	3B	4B	5B
(C) Occasional	1C	2C	3C	4C	5C
(D) Remote	1D	2D	3D	4D	5D
(E) Improbable	1E	2E	3E	4E	5E
(F) Eliminated					

The sixth step of the safety risk management process is completed by inputting the Risk Assessment Matrix results into the Safety Hazard Risk Index Matrix (**Table 8**). This allows staff to determine the safety hazard's risk index for each hazard that was identified.

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**Table 8. Safety Hazard Risk Index Matrix (Step 6)**

HAZARD ACCEPTANCE CRITERIA			
Hazard Risk Index	Decision Authority		Special Conditions
	1A, 1B, 1C, 2A, 2B, 3A	Unacceptable	<i>Must be mitigated</i>
	1D, 2C, 2D, 3B, 3C, 4A	Undesirable	<i>Requires bus transit agency management decision:</i>
	1E, 2E, 3D, 3E, 4B, 4C, 4D, 5A, 5B, 5C	Acceptable with Review	<i>Requires bus transit agency management decision:</i>
	4E, 5D, 5E	Acceptable without Review	Acceptable without further review
Eliminated			

Hazards are further defined as the following:

- Unacceptable Hazards – Hazards with a Hazard Risk Index of 1A, 1B, 1C, 2A, 2B, 3A are “unacceptable” and must be mitigated in the most expedient manner possible to eliminate or control them prior to the project initiating service, by reducing the severity and/or probability of the hazard to an acceptable level.
- Undesirable Hazards – Hazards with a Hazard Risk Index of 1D, 2C, 2D, 3B, 3C, 4A are “undesirable.” A management decision is required by Scottsdale on the specific method of corrective action to mitigate the risk based on additional considerations such as the availability of acceptable alternative measures (workarounds), availability of resources, on a permanent or temporary basis.
- Acceptable with Review Hazards – Hazards with a Hazard Risk Index of 1E, 2E, 3D, 3E, 4B, 4C, 4D, 5A, 5B, 5C are “acceptable with review” by the bus transit agencies. Scottsdale may accept the risk associated with retaining the identified hazard in an “as is” condition with no further corrective action. Alternatively, the Scottsdale may prescribe periodic tests and inspections or other preventative measures to ensure, on a continuing basis, that the original severity and probability ratings are not invalidated over time by degradation of conditions in the subject item.
- Acceptable without Review Hazards – Hazards with a Risk Index of 4E, 5D, 5E are “acceptable” without review. The results of the analysis will be shared by the CSO with the Accountable Executive on an ongoing basis to identify appropriate actions. All “unacceptable” hazards must be eliminated, and measures will be taken for the remaining risk acceptance categories to minimize risk. The results of such analysis will be shared with agency staff and law enforcement agencies on a quarterly basis for awareness and support.

If the risk index is acceptable, the hazard must be monitored. If the risk index is undesirable, the hazard requires careful monitoring and may also require steps taken to lower the risks at the discretion of Executive Management. If the risk index is unacceptable, steps are taken by PTD to lower the risk to an acceptable or tolerable level, or to remove or avoid the hazard.

#### **7.7.2.2 Contractors**

Each Contractor has developed a procedure to assess safety hazards that includes the use of a Safety Hazard Risk Matrix that determines the severity and probability of the hazard. Based on the matrix, each Contractor has a process to determine the level of risk a safety hazard poses to the organization.



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For more information on the procedures each Contractor has on *assessing safety risks*, see:

- **First Transit – Appendix B.6** (Safety Risk Management)
- **Transdev – Appendix C.5** (Safety Hazard Assessment)
- **MV Transportation – Appendix D.5** (Safety Risk Management)

A third party may conduct a Contractor's risk assessment review.

### 7.7.3 Safety Risk Mitigation

#### 7.7.3.1 PTD

The risk assessment process may indicate that certain hazards are low risk, while others require mitigation to achieve an acceptable level. In the seventh step of the safety risk management process, staff catalogue hazard information as illustrated in the Hazard Risk Register (**Table 9**). After the completion of the exercises **previously detailed**, the hazard ID, type, source, description, rating (probability and severity), mitigation, status, and new hazard rating information can be populated in the risk register.

The previous steps of the risk management process are summarized in **Table 9**.

**Table 9. Hazard Risk Register (Step 7)**

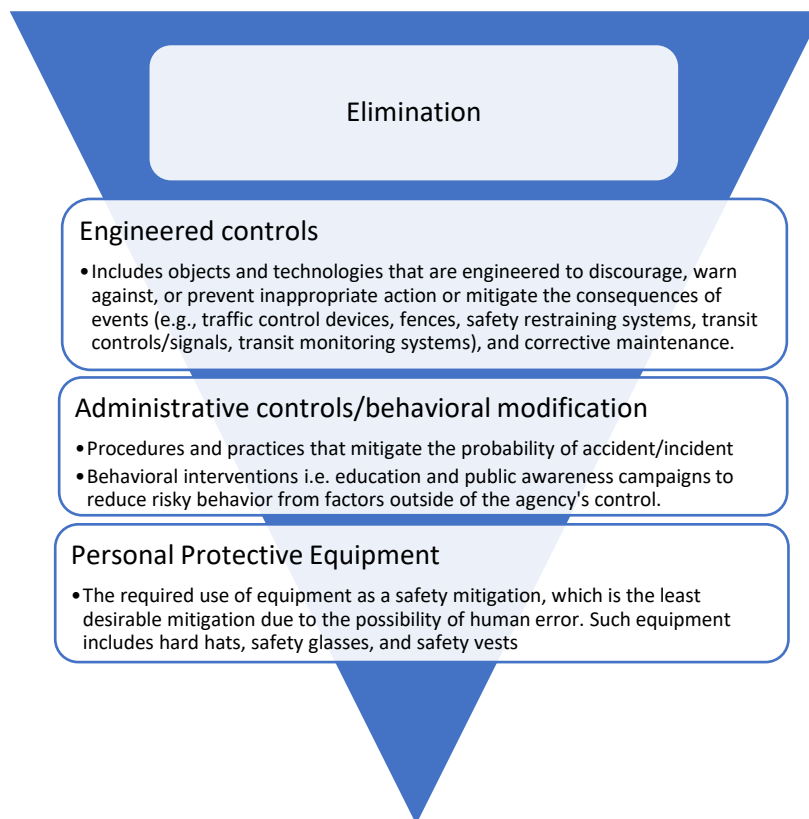
Hazard ID	Hazard Type	Source	Identification Date	Description	Hazard Rating (Likelihood and Consequence)	Mitigation	Status of feedback with reporter (if applicable)	Updated Hazard Rating (after mitigation)	
Hazard ID	Hazard Type	Source	Identification Date	Location	Description	Hazard Rating (Likelihood and Consequence)	Mitigation	Status of feedback with reporter (if applicable)	Updated Hazard Rating (after mitigation)
Haz-09302 022-01	Maintenance	Employee Report	9-30-2022	NW side of shop floor	Employee identified an ongoing slip/fall hazard on the shop floor due to a roof leak.	3B (Undesirable)	Fix roof leak	Open	F (eliminated)
Haz-10042 022-01	Maintenance	Employee Report	10-4-2022	Intersection of X and Y	Operator identified a line of sight hazard due to overgrown foliage which may result in a potential collision with individual, vehicle, or object.	2D (Undesirable)	Work with City Public Works to cut back the overgrown foliage	Closed	2E (Acceptable with review)

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The intention of the **Table 9** Hazard Risk Register is to ensure that all available safety hazard information is considered when determining the appropriate hazard mitigation measures. This table includes sample hazards as an example of how the Risk Register may be used

In the eighth and final step of the safety risk management process, PTD may determine and implement safety mitigation actions to reduce or eliminate all identified safety hazards.

Safety risk mitigations may come in various forms in order to address the specific hazard accordingly. Ultimately, the ideal mitigation is total elimination, but in scenarios where this is impossible, there are varying degrees of protection, ranging from engineering controls, administrative controls/behavioral modifications, and the least protective, personal protective equipment, as further laid out in **Figure 6**.



**Figure 6 Hierarchy of Controls to Mitigate Risks**

Once a mitigation action has been identified, staff will assess all changes that result from the mitigating actions and their impacts to the transit safety performance targets. If existing mitigation measures are sufficient, then no further mitigation actions are necessary. If a change is determined to impact a safety performance target, then the change is evaluated through the safety risk management process.

For clarity, a scenario that properly utilizes the safety risk management process is detailed in **Figure 7**.

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### Safety Hazard Scenario

Staff discovered that the wheel balancer has not been calibrated since 2017. Although a specialist is brought in to calibrate the machine, a transit safety specialist decides to complete the safety risk management process to determine whether further mitigation is needed on the vehicles the machine directly serves.

- Step 1: The hazard is identified by staff to be “an out of calibration wheel balancer” and is communicated to a safety representative, as depicted on **Figure 4**.
- Step 2: Using **Table 4**, the hazard is determined to be of a “Technical Equipment” type, as the hazard most closely resembles that description.
- Step 3: Using **Table 5**, the probability is determined to be in the “Not Likely” category based on available historical information that most closely resembles that probability criteria.
- Step 4: Using **Table 6**, the severity is determined to be in the “Critical” category, as the worst credible outcome to maintaining the hazard closely matches that criteria.
- Step 5: Using **Table 7**, the risk assessment matrix results in a “High” level of risk after considering the information from **Table 5** and **Table 6**.
- Step 6: Using **Table 8**, the risk index determines the level of risk to be “unacceptable” based on the level of risk determined by **Table 7**.
- Step 7: Using **Table 9**, the relevant information for the determination of the necessary risk mitigation actions, if any, is noted to be the following:
- A wheel balancer is out of calibration.
  - There is a technical equipment hazard.
  - The hazard is not likely to occur.
  - The hazard’s consequences are critical to the transit system’s operation.
  - The risk to the transit system posed by the hazard is determined to be unacceptable.
- Step 8: Staff determined, in part with the use of **Table 10**, that an “Administrative Action” will reduce the level of risk posed by the hazard to an acceptable level. The administrative actions may include the introduction of wheel balancer calibration training and the establishment of routine calibration maintenance procedures, for example.

**Figure 7. Safety Risk Management Scenario**

#### **7.7.3.2 Contractors**

Contractors undergo independent safety risk mitigation of all identified hazards. Contractors utilize, at a minimum, the same hazard information that is illustrated in **Table 7, 8, and 9** to help prioritize all hazards and all safety risks are documented and prioritized according to the level of risks.

Each Contractor outlines their *Safety Risk Management Scenarios* in each of their own safety plans:

- **First Transit – Appendix B.6** (Safety Risk Mitigation)

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- **Transdev – Appendix C.5** (Safety/Risk Hazard Mitigation)
- **MV Transportation – Appendix D.5** (Hazard Resolution)

## 7.8 Safety Assurance

Safety assurance is a process that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that PTD meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

### 7.8.1 Safety Performance Monitoring and Measurement

Contractors collect and monitor data on safety performance indicators through a variety of mechanisms, including collecting data on key metrics on a regular basis and preparing regular reports on safety performance. Contractors then use that data to measure effectiveness of current mitigation strategies, to identify safety problems and track the organization's overall progress towards meeting their performance targets.

For specific details about each Contractor's Safety Performance Monitoring and Measurement methods, see:

- **First Transit – Appendix B.7** (Safety Performance Monitoring and Measurement)
- **Transdev – Appendix C.6** (Performance Monitoring and Measurement)
- **MV Transportation – Appendix D.6** (Safety Performance Monitoring and Measurement)

#### 7.8.1.1 Monitoring Compliance and Sufficiency of Procedures

##### PTD Employee and Contractor Safety Monitoring

PTD employee compliance with standard safety operating procedures is monitored by Department staff through observation and review of information and data submitted from both employees and customers.

Contractor compliance is monitored by PTD staff through the routine and frequent monitoring activities at transit facilities and in the field. Staff complete inspection reports that include safety reporting ([Appendix E.4](#)). PTD staff also submits monthly compliance reports to their respective supervisors. This reporting system addresses non-compliance with standard procedures for operations and preventive maintenance activities through a variety of actions, including revising training materials, and when necessary, providing systemwide employee and supervisor training.

When non-compliance is situational, mitigation activities can include individualized training, coaching and heightened management oversight. When non-compliance is determined to be a result of inadequate operations or preventive maintenance procedures, the identified deficient procedures are submitted to the risk management process. At the conclusion of the risk management process, the deficiencies are addressed to resolve the non-compliant issue.

PTD assigns specific staff to the role of a contract monitor. Each contract monitor oversees the Contractors for compliance with PTD contracts, SPTs, compliance with NTD safety reporting standards, information accuracy and adherence to operations and safety procedures. In addition, each month, or as needed, Contractors share their safety performance data, incident and safety reports, and safety observations with PTD and hold an Operations meeting as illustrated on **Figure 7**. The performance data is communicated to FTA's NTD monthly using the Uniform System of Accounts document as circumstances dictate.

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**Figure 8. PTD and Contractor Monthly Communication**

### **Contractors**

On a monthly basis, Contractors document safety performance data, incident and safety reports, recap reports, and safety observations, and present this information to PTD during the Operations meeting. Contractors also monitor bus and paratransit systems for compliance with PTD and FTA operations and maintenance procedures and communicate findings to PTD monthly. In addition, Contractors are responsible for independently monitoring their employee's compliance with the company's standard operating procedures as outlined in their individual safety plans, found in:

- **First Transit – Appendix B.7** (Safety Performance Monitoring and Measurement)
- **Transdev – Appendix C.6** (Performance Monitoring and Measurement)
- **MV Transportation – Appendix D.6** (Safety Performance Monitoring and Measurement)

#### **7.8.1.2 Safety Events**

##### **PTD**

All investigation reports of safety events and risk management resolution reports are monitored by assigned staff and reported to the CSO and the Accountable Executive. These reports are provided by the Contractor upon the conclusion of a safety event investigation conducted by the Contractor. Additionally, Contractors provide PTD with monthly NTD safety reports that staff use to identify safety trends and SRM measures that may be ineffective, inappropriate, or not implemented as intended.

If the safety risk mitigation measure does not bring the risk to an acceptable level or otherwise fails to meet safety objectives, then staff resubmit the safety risk/hazard to the risk management process. The CSO then works with staff, the Contractor, and subject matter experts, to identify and implement additional mitigation measures.

### **Contractors**

Each Contractor develops their own individual procedures for monitoring the effectiveness of safety hazard mitigation measures. The Contractors closely manage their safety performance data and conduct audits to ensure they are effectively addressing safety risks within their organization.

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For specific *safety monitoring procedures*, see:

- **First Transit – Appendix B Section 7** (Safety Performance Monitoring and Measurement) and **SOP #700-Accident & Safety Data Acquisition**
- **Transdev – Appendix C.6** (Performance Monitoring and Measurement)
- **MV Transportation – Appendix D.6** (Safety Performance Monitoring and Measurement)

#### **7.8.1.3 Safety Event Investigation**

##### **PTD**

PTD employees follow the Department's operational safety procedures as outlined in AR 2.31 ([Appendix F](#)). These operational procedures help identify initial information that may be utilized in a safety event investigation and include the following:

- Establish and maintain a system for reporting accidents.
- Analyze accidents to learn cause and prevention.
- Solicit suggestions from employees and promptly adopt good ideas that will promote better safety.
- Solicit the advice of the safety committees where applicable.

For example, at the scene of a collision, PTD employees follow the *Action at Scene of Collision* steps that are outlined in AR 2.31 ([Appendix F.3](#)). Steps to be taken are categorized by severity and include drivable vehicles, non-drivable vehicles, injury accidents, non-injury accidents, and vary in their prescribed actions.

If an event meets the criteria as an accident, employees would then take steps to first contact the appropriate emergency services and then their supervisor.

##### **Contractors**

Contractors conduct their own investigations of safety events and notify PTD staff for tracking and NTD reporting. The PTD CSO may assign internal Department staff to the event investigation and request a debrief of the safety event investigation, as well as review all related investigation documentation. The objective of the review of the Contractor safety event investigation is to determine whether the event is considered preventable and if there were any policy violations. Additionally, assigned CSO representatives may develop strategies that the Contractor and staff can employ to address the identifiable root cause of any organizational, technical, or environmental hazards.

Each Contractor has created their own procedures and subject matter experts for investigating safety events, and their company practice include using data and statements from the involved parties to determine the cause of the incident, and mitigation measures that need to be taken to ensure the safety event does not reoccur.

For specific details about the Contractors' *safety event investigation procedures*, see:

- **First Transit – Appendix B.7** (Safety Performance Monitoring and Measurement)
- **Transdev – Appendix C.6** (Performance Monitoring and Measurement)
- **MV Transportation – Appendix D.6** (Safety Performance Monitoring and Measurement)

#### **7.8.1.4 Monitoring Internal Safety Reporting Programs**

##### **PTD**

PTD employees are encouraged to report any safety-related issues and incidents to their supervisor or using the department's escalation ladder. However, when an employee wishes to remain anonymous, the

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city of Phoenix's City Auditor operates the "Integrity Line," as outlined in Administrative Regulation 1.2 (Fraud Prevention and Reporting Policy [Integrity Line]) ([Appendix G](#)).

Safety reports that are directly communicated to a supervisor for evaluation, and management is informed as prescribed, or when the issue is out of the supervisor's control. When a report is submitted to the city's Integrity Line, it is initially reviewed by the Integrity Line Committee, which is comprised of representatives from offices of the City Auditor, the City Attorney, and the City Manager. The committee then refers the issue(s) to PTD's Director and CSO for review and possible investigation.

## **Contractors**

Through their respective agreements with the city, each Contractor is tasked to identify safety hazards and monitor performance metrics and prepare investigation reports on safety incidents for the city's review. All the Contractors use the data to identify trends of reoccurring safety events that need to be mitigated.

For the specific procedures for *monitoring internal safety reporting programs* for each individual Contractor, see:

- **First Transit – Appendix B.6** (Safety Performance Monitoring and Measurement)
- **Transdev – Appendix C.5.1** (Performance Monitoring and Measurement)
- **MV Transportation – Appendix D.6** (Safety Performance Monitoring and Measurement)

## **7.8.2 Management of Change**

### **7.8.2.1 PTD**

Proposed or future changes in the public transit system may introduce new hazards and safety risk into transit operations. Therefore, staff are charged with identifying system changes and determining when a change must be evaluated through the safety risk management process.

To accomplish this, staff proactively monitor planned changes and utilize PTD and Contractor field monitoring personnel to identify any changes in the transit system. Following the identification of a change, the change is submitted to the risk management process to assess the change and determine whether mitigation measures for newly identified hazards, if any, are appropriate.

### **7.8.2.2 Contractors**

Each Contractor has developed procedures to assess how changes may create new hazards and impact safety performance. The Contractors all have a process to review the proposed change and assess how the change could impact safety. Depending on the level of impact the proposed change is anticipated to have on safety, the Contractors takes actions to minimize and/or eliminate the safety risk associated with the proposed change.

For specific details about each Contractor's *process for reviewing proposed changes*, see:

- **First Transit – Appendix B.7** (Management of Change)

## **7.8.3 Continuous Improvement**

### **7.8.3.1 PTD**

Evaluation of the SMS is necessary to ensure that allows PTD to meet safety objectives and performance targets. As a result, PTD reviews the system safety plan during annual self-certification.

PTD also uses this data to assess identified deficiencies in SMS organizational structures, processes and resources. If deficiencies are found as part of the safety performance assessment, staff then develops and implements a plan to address any identified deficiencies.

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### **7.8.3.2 Contractors**

Each Contractor has their own procedures to ensure their organizations are constantly striving to improve safety. The Contractors have committed to regularly reviewing and updating their safety policies and procedures, both through the annual review process and other review processes and audits that are specific to each company.

For more detailed information on each Contractor's *process for continuous improvement*, see:

- **First Transit – Appendix B.7** (Continuous Improvement)
- **Transdev – Appendix C.6** (Continuous Improvement)

## **7.9 Safety Promotion**

Management support is essential for developing and implementing SMS. Safety promotion includes all aspects of “who, what, when, where, why, and how” PTD and its Contractors communicate safety related topics.

### **7.9.1 Safety Communication**

#### **7.9.1.1 PTD**

PTD regularly communicates safety information regarding hazards and safety risks relevant to employee roles and responsibilities and informs employees of safety actions taken in response to all reports submitted. Methods of communication include:

- The Employee Critical & Emergency Incident Communication Map ([Appendix G.2](#))
- Safety updates incorporated in quarterly PTD meetings
- Safety information uploaded to PTD's employee accessible SharePoint site
- On-site management and inspections

PTD collects, catalogs and, where appropriate, analyzes and reports safety and performance information to all staff. Staff answer the following questions to help facilitate accurate safety reporting:

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

In addition, staff routinely reviews existing communication strategies to determine if additional measures are needed to effectively reach staff and Contractors. As part of this effort, PTD uses a “safety culture survey” to understand how safety is perceived in the workplace and what areas should be addressed to fully implement a culture of safety. The CSO and relevant PTD staff are responsible for preparing and distributing all related safety materials and communications.

#### **7.9.1.2 Contractors**

Each Contractor has adopted a comprehensive safety communication program to communicate safety information to their employees. This includes monthly safety meetings to brief staff in safety sensitive positions about safety trends and other safety related topics. The Contractors also have programs where they use various means to promote safety within the company, including having a safety bulletin board and sending out emails about safety.



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For specific details about how each Contractor disseminates safety information to its employees, see:

- **First Transit – Appendix B.7** (Safety Communication)
- **Transdev – Appendix C.6.2** (Safety Communication)
- **MV Transportation – Appendix D.7** (Safety Communication)

## **7.9.2 Safety Training**

### **7.9.2.1 PTD**

PTD has a safety training program aimed at informing employees who are directly responsible for safety of potential hazards and understand safety policies. The city's Human Resources Department is responsible for assigning the appropriate training to PTD staff as outlined in the city of Phoenix Administrative Regulation 2.31 (Safety Program) ([Appendix G](#)).

PTD has developed and provides safety training for all staff who are directly responsible for safety and/or have safety risks associated with their responsibilities, per 49 U.S.C. 5329(d)(1)(H). To develop a safety training program compliant with FTA requirements, PTD:

- Reviewed general staff categories (e.g., administrative, driving position, supervisor, maintenance) and respective safety related responsibilities.
- Assessed the training requirements of 49 CFR 672 and 49 U.S.C. 5329 and the courses required for different positions.
- Assessed the training material available on the FTA PTASP Technical Assistance Center website.
- Reviewed other training material available from industry sources such as the Community Transportation Association of America and the American Public Transportation Association websites.
- Developed a set of competencies and trainings required to meet the safety related activities for each general staff category.
  - Per 49 USC 5329, the PTD and Contractor personnel responsible for operations and maintenance of facilities and buses will also begin to receive all necessary safety training under the training program and will receive de-escalation training.
- Developed expectations for ongoing safety training and safety meeting attendance.
- Adjusted job notices associated with general staff categories to ensure that new personnel understand the safety related competencies and training needs, and the safety related responsibilities of the job.

The following training programs are implemented by PTD:

- New hire and orientation safety training
- Initial safety training program for operations and maintenance personnel
- Annual training to include new hazards and refresher courses
- De-escalation training for operations and maintenance personnel
- Safety meetings

### **7.9.2.2 Contractors**

PTD contract monitors actively monitor each Contractor, which in turn provide their staff with appropriate safety training. Contractors are required to administer the appropriate safety training to their employees, including transit system administrative, operators, mechanics, fuelers, cleaners, and other staff responsible for safety within their organization. Each Contractor has developed comprehensive training programs for these employees that include new hire training, as well as ongoing training for their employees.

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For details about each Contractor's *training programs*, see:

- **First Transit – Appendix B.8** (Competencies and Training)
- **Transdev – Appendix C.7** (Competency & Training Program)
- **MV Transportation – Appendix D.7** (Competencies and Training)

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## **Appendix A.**

### **City Council Minutes or Resolution**

To be added

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## **Appendix B.**

### **First Transit Abbreviated Safety Plan (see attachment)**

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## **Appendix C.**

### **Transdev Abbreviated Safety Plan (see attachment)**

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## **Appendix D.**

### **MV Transportation Abbreviated Safety Plan (see attachment)**

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## Appendix E

### PTASP Performance Target Log

MB (per 100,000 VRM)							
Mode - MB	Fatalities	Rate* of Fatalities	Injuries	Rate* of Injuries	Safety Events	Rate* of Safety Events	Mean Distance Between Mechanical Failure
2019 Actual	0	0.00	39	0.18	71	0.32	19,810
2020 Actual	0	0.00	35	0.17	105	0.51	15,241
2021 Actual	5	0.02	51	0.25	157	0.78	18,365
Average	1.67	0.01	42	0.20	111	0.54	17,805
2023 SPT (MB)	1.67	0.01	42	0.20	111.00	0.54	17,805

DR (per 100,000 VRM)							
Mode - DR	Fatalities	Rate* of Fatalities	Injuries	Rate* of Injuries	Safety Events	Rate* of Safety Events	System Reliability
2019 Actual	0	0.00	1	0.03	1	0.03	18,989
2020 Actual	0	0.00	0	0.00	2	0.07	22,554
2021 Actual	0	0.00	1	0.03	2	0.06	19,036
Average	0	0	0.67	0.02	1.67	0.06	20,193
2023 SPT (DR)	0	0	0.67	0.02	1.67	0.06	20,193

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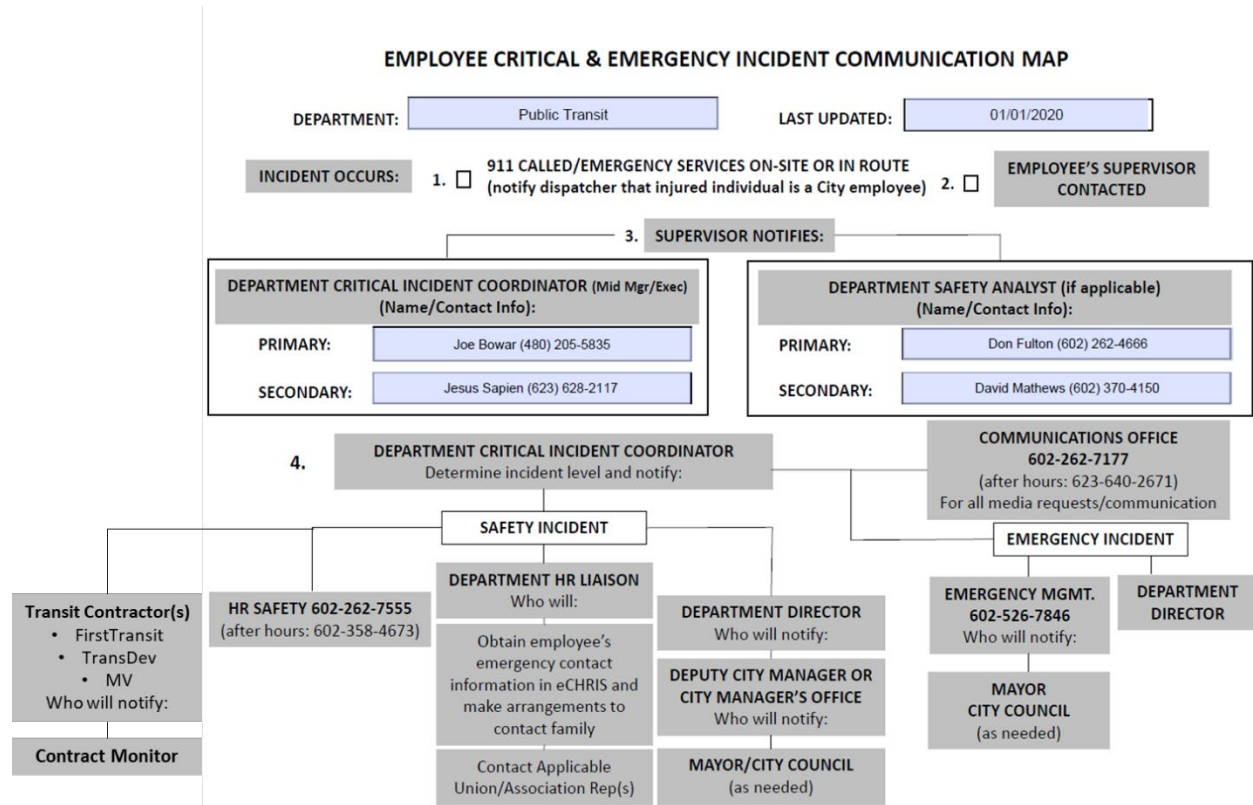
## **Appendix F. PTASP Supporting Documents**

1. **PTD's Critical & Emergency Incident Communication Map**
2. **Employee Critical Incident Training**
3. **City of Phoenix Administrative Regulations**
4. **Public Transit Department Facility Inspection Report**



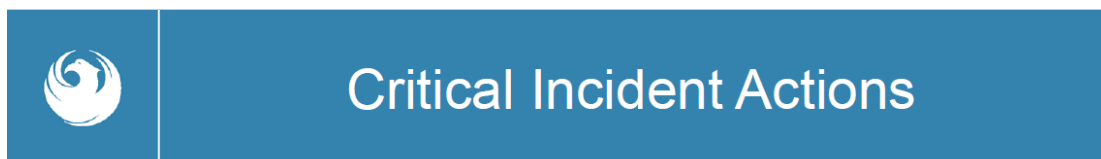
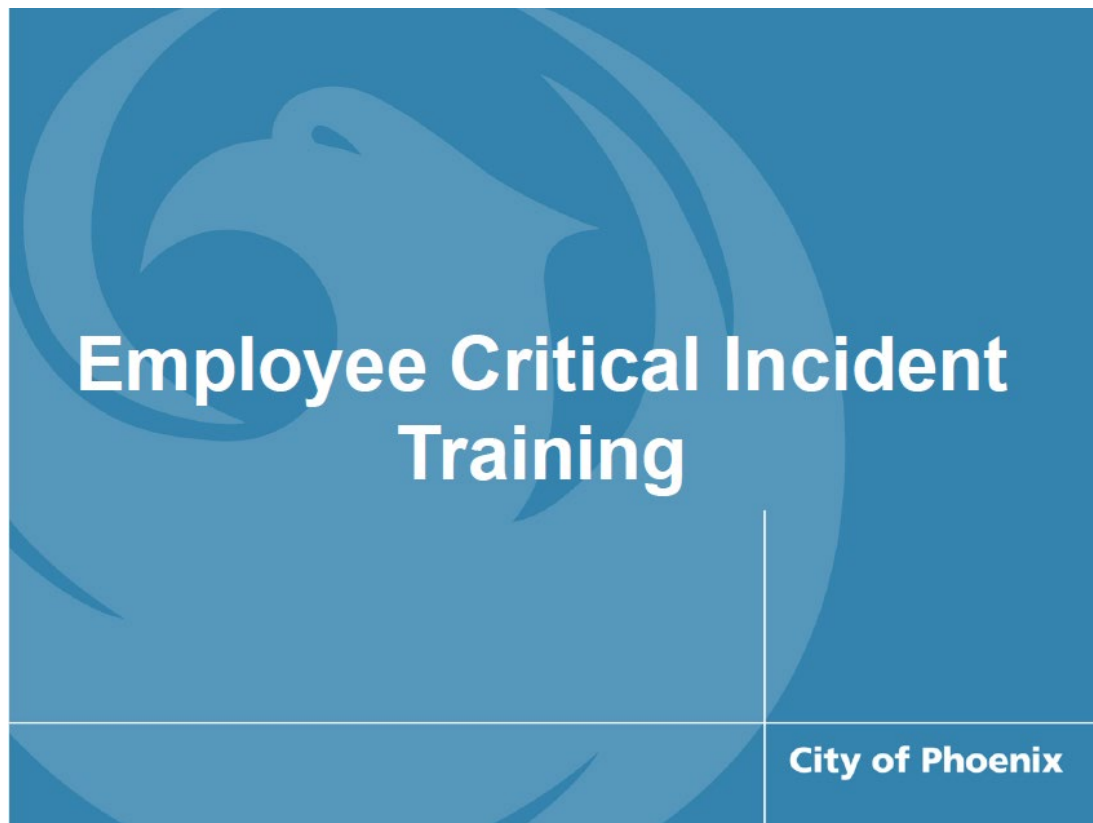
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## F-1. PTD's Critical & Emergency Incident Communication Map

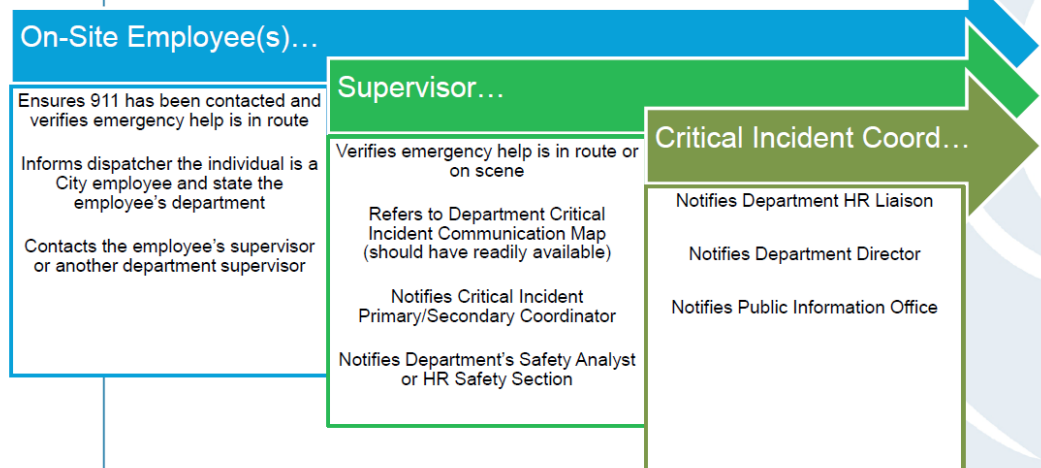


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## F-2. Employee Critical Incident Training



**CRITICAL INCIDENT OCCURS.....**



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### F-3. City of Phoenix Administrative Regulations



**City of Phoenix**

<b>ADMINISTRATIVE REGULATION</b>		A.R. NUMBER 1.2 Revised
		FUNCTION General
		Page 1 of 6
SUBJECT <b>FRAUD PREVENTION AND REPORTING POLICY (INTEGRITY LINE)</b>		EFFECTIVE DATE February 9, 2017
<p><b>I. PURPOSE</b></p> <p>This A.R. is updated and codifies the existence of the Integrity Line Program (Integrity Line) and the City's policy on preventing and reporting fraud or unethical activity. Integrity, honesty and professionalism in service to the community are important values of employees at the City of Phoenix. Part of maintaining our high ethical standards includes a way for employees or residents to report wrongdoing or bad behavior. Supervisors, managers and department directors are the first lines of reporting, and the Integrity Line provides a valuable secondary resource in the event that reporting to supervisors, managers or department directors is not possible or desired.</p> <p>This fraud prevention policy exists because:</p> <ul style="list-style-type: none"> <li>• The public entrusts us with resources to be used appropriately.</li> <li>• We work to serve the public good, not for personal gain.</li> <li>• Best business practices include a documented fraud prevention policy and an "integrity line" for anonymous reporting.</li> </ul> <p>Though individuals are encouraged to make reports to supervisors, managers or department directors, or to the Police Department about illegal activity, the Integrity Line provides a valuable outlet for an individual to make a complaint, anonymous or otherwise.</p> <p>The purpose of this policy is to establish guidelines and assign responsibility for the development of controls and conducting of investigations to aid in the prevention and detection of fraud against the City of Phoenix (City).</p> <p><b>II. SCOPE OF POLICY</b></p> <p>This policy applies to any irregularity, or suspected irregularity, involving City employees (employees) as well as consultants, vendors, contractors, outside agencies doing business with the City, and/or any other parties with a business relationship with the City. Any investigative activity required will be conducted without regard to the suspected perpetrator's length of service, position/title, or relationship to the City.</p>		

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Revised A.R. 1.2  
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### III. OVERVIEW

Fraud is an ever-present threat, has many forms, and is always damaging. It takes away valuable resources entrusted to the City. Fraud is not only illegal but it also creates a very real threat to the resources available to the City and its residents.

The City requires all employees to act honestly and with integrity, and to safeguard the resources for which they are responsible. Employees at all levels are encouraged to actively participate in protecting public money and property. All employees are responsible for the detection and prevention of fraud, misappropriations, and other irregularities.

By identifying areas where the risk of fraud exists, detecting fraud which has already occurred, taking firm action against the perpetrators and designing systems to prevent the occurrence of fraud, this Anti-Fraud Policy aims to develop a culture within the City which raises the awareness of the risks and consequences of fraud. It provides a framework for promoting the City's policies and measures to prevent and detect fraud and it is an important component to the City's system of internal controls.

### IV. ACTIONS CONSTITUTING FRAUD

All employees should be familiar with the types of fraud that might occur within their area of responsibility and be alert for any indication of fraud. For the purposes of this statement, *fraud* is defined as the intentional, false representation or concealment of a material fact for the purpose of gaining an advantage, avoiding an obligation, or causing loss to another party. Fraud may include deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts, and collusion. More specifically, acts of fraud may include, but are not limited to:

- Removal, loss, unauthorized destruction, inappropriate use or waste of funds, supplies, records, furniture, fixtures, equipment, or other City assets
- Impropriety in the handling or reporting of money or financial transactions
- Misuse or misreporting of paid work time or paid time off
- Accepting or seeking anything of value from contractors, vendors, or persons providing services/materials to the City (including vendor kickbacks)
- Use or willful unauthorized disclosure of personal identifying and restricted information for a purpose unrelated to City business
- Violations of laws or regulations
- Contract fraud
- Falsified documents
- Specific danger to public health or safety
- Any similar or related irregularity

### V. POLICY

Fraud that is detected or suspected should be immediately reported to appropriate supervisors or managers or through the City's Integrity Line, where investigations are coordinated by the Integrity Committee. The Integrity Committee is comprised of the City Auditor, the City Attorney, and the City Manager or designee. The City recognizes a zero tolerance policy regarding fraud and will investigate any fraud or suspected fraud.



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#### V (1) Responsibilities

##### a. All Employees

All employees individually have the primary responsibility for the prevention of fraud. Any employee who suspects or detects fraudulent activity must immediately report it to their supervisor, managers, department director, or City Auditor. If reporting to a supervisor, manager, department director or City Auditor is not possible or desired, the employee should report the suspected activity directly to the Integrity Line (see Section V(2)). Employees must not attempt to personally conduct investigations or interviews / interrogations or discuss any details of the suspected fraudulent act with unauthorized personnel. The appropriate law enforcement agency will be involved if illegal activity is being investigated.

Employees will provide unrestricted access to all City records, and property, and provide the necessary assistance, cooperation and support to enable the Integrity Committee and its delegates to properly investigate suspected fraudulent acts. Refusal to cooperate in an investigation may result in disciplinary action, up to and including termination.

##### b. Management

In addition, Management is also responsible for:

- i. Assessing the types of risk involved in the operations for which they are responsible.
- ii. Developing systems of internal control to minimize the risk of fraud and ensuring that controls are being consistently applied.
- iii. Satisfying themselves that their internal control systems continue to operate effectively.
- iv. Raising fraud awareness amongst staff including knowledge of the City's anti-fraud policy.
- v. Reporting fraudulent or suspected fraudulent activity directly to the City Auditor who will include the report in the Integrity Line process.
- vi. Implementing new internal controls to reduce the risk of similar fraud occurring where frauds have taken place.
- vii. Responding comprehensively in writing to all inquiries made during the course of an investigation, or to recommended corrective actions in connection with the investigation.

##### c. Integrity Committee

The Integrity Committee is authorized to coordinate the investigation of suspected fraudulent acts as defined in this policy. If the investigation substantiates that fraudulent activities have occurred, the Integrity Committee will notify appropriate designated personnel and, if appropriate, will notify the City Manager, Audit Committee, Mayor, and City Council.

As warranted, the Integrity Committee will coordinate with criminal and regulatory law enforcement agencies in order to facilitate appropriate criminal investigation and prosecution. The law enforcement and/or regulatory agency will make the final decision to investigate a fraudulent act.

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## V (2) Reporting Fraud to the Integrity Line / Integrity Committee

The City has established the following methods that allow employees to make confidential anonymous reports of fraud, suspicions of fraud, or any other inappropriate action.

- **Telephone:** 602-261-8999 or 7-1-1 Relay. The telephone will be answered by the Secretary to the City Manager whenever possible during normal business hours. A recorded message may be left if no one is available.
- **E-mail:** [aud.integrity.line@phoenix.gov](mailto:aud.integrity.line@phoenix.gov)
- **Online Fraud Reporting Form:** You may access the Fraud Reporting Form by visiting the PHX AT YOUR SERVICE tool (at [www.phoenix.gov/atyourservice](http://www.phoenix.gov/atyourservice)) and selecting the **FRAUD REPORTING** button under the Additional Services subsection.

Employees should provide as much of the following information as possible when making a report:

- Circumstances of the incident and details of how the fraud / inappropriate action took place
- Names of all persons involved, including division and department
- Date(s), time(s) and location(s) of the event(s) that took place
- If missing funds, identify source of funds and how much
- Identify any evidence or documentation that is available
- Names of witnesses
- A telephone number where the employee can be reached. In order to assist in the investigation, those reporting potential violations are encouraged to identify themselves. Every reasonable effort will be made to keep the identity of an individual reporting potential fraudulent activity confidential. However, anonymous complaints are accepted.
- Any other information that may be helpful in an investigation.

## VI. RETALIATION

Retaliation against a person who initiates a complaint or inquiry or participates in fact-finding is prohibited. Persons found to have engaged in retaliation are subject to the full range of disciplinary actions, up to and including termination.

## VII. CORRECTIVE ACTION

The City will take the necessary steps, including legal action, to recover any losses arising from fraud or attempted fraud. This may include action against third parties involved in the fraud whose negligence contributed to the fraud. Employees found to be associated with fraudulent activity will be subject to disciplinary action, up to and including termination and legal prosecution, in accordance with City policies and procedures and applicable laws and regulations.

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If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by designated representatives from the City Human Resources and Law Departments before any such action is taken. The decision to terminate an employee is made by the employee's management and is subject to the regular appeals process.

### VIII. CONFIDENTIALITY

The Integrity Committee and its delegates will maintain strict standards of confidentiality, and will not voluntarily release information about an investigation or inquiry except where examination results are referred to law enforcement and/or regulatory agencies for independent investigation or where required by law. After investigations are complete, it is likely that documentation related to the complaint would become a public record and would require disclosure if requested. Complete anonymity cannot be guaranteed due to public records laws.

### IX. OTHER IRREGULARITIES

In cases related to employment, harassment and discrimination please refer to the chart below. While the Integrity Line will accept reports of these cases, the Integrity Committee will refer them as noted below.

Issue	Refer issue to
Hiring process, recruitments, employee qualifications, performance evaluations	Department Human Resources Liaison or Human Resources Department at 602-262-6609
Sexual Harassment (A.R. 2.35A) or Protected Category Harassment (A.R. 2.35B)	Department Human Resources Liaison or Equal Opportunity Department's Compliance and Enforcement Division at 602-262-7486
Discrimination / denial of equal employment opportunities (A.R. 2.35)	Equal Opportunity Department's Compliance and Enforcement Division at 602-262-7486

### X. RELATED POLICIES

This policy is designed to augment other City policies and external regulatory requirements, and not to replace or preclude them. Other policies and requirements containing related information include, but are not limited to, the following:

- Ethics Handbook
- Employee Manual
- AR 1.90, *Information Privacy and Protection*
- AR 2.61, *Grievance Procedure*
- AR 2.91, *Conflicts in Employment, Supervisory and Contractual Relationships*
- AR 2.93, *City Employee Gift Policy*
- Fraud Reporting Webpage
- City Charter (various)
- Arizona Revised Statutes (various)

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## City of Phoenix

<b>ADMINISTRATIVE REGULATION</b>		A.R. NUMBER
		2.31 Revised
SUBJECT		FUNCTION
		Human Resources and Payroll
		Page 1 of 3
		EFFECTIVE DATE
<b>SAFETY PROGRAM</b>		September 10, 2012
		REVIEW DATE
<b>INTRODUCTION</b>		
<p><b>Transmittal Message</b>  This AR has been revised to reflect changes resulting from updating terminology and functionality within the Human Resources Department, Safety Section. Questions regarding this AR should be directed to the Human Resources Department, Safety Section at (602) 262-7555.</p> <p><b>Summary of Changes</b>  This regulation, last modified in 2008, has been revised to reflect the name change from the Personnel Department to the Human Resources Department; and to add the requirement of providing Personal Protective Equipment where necessary.</p> <p><b><u>Purpose of Safety Policy</u></b>  The safety and health of each employee is extremely important to both the welfare and happiness of the individual employee and to the efficiency of services provided by City employees to the community. It is the policy of the City to exert every effort to eliminate or reduce the possibility of accidents to people and losses of property. In order to achieve the highest degree of safety, the responsibility, organization, and operational procedures for a safety program must be defined and put into effect.</p> <p>The statement of this policy is issued to clarify the responsibility for the safety program, establish procedures for implementing and enforcing safety policies, require appropriate corrective measures, and to ensure the development and maintenance of a safe working environment for all employees.</p> <p><b><u>Responsibility for Safety</u></b>  Department directors and managers, along with all supervisory personnel, have the responsibility of communicating to their employees the safety policy of the City as provided in this regulation.</p> <p>A. <b><u>Department Management.</u></b> The primary responsibility for providing an accident-free workplace shall rest with department directors. Each department and large division must have a definite plan whereby the City's safety program will reach every employee in every job. It is the responsibility of department management to enforce the maintenance of safe work conditions; to encourage development and observance of safety habits; and to expedite removal and correction of safety hazards.</p>		



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B. Supervisors. It shall be the responsibility of each supervisor to:

1. Detect and correct unsafe working conditions and practices. Safety problems beyond the supervisor's control shall be reported to management immediately.
2. Train employees in the correct work procedures and City safety policies.
3. Ensure each employee knows and follows the safety rules pertaining to their work.
4. Provide employees all necessary Personal Protective Equipment (PPE) for hazards that cannot be engineered out.
5. Encourage safety suggestions and discussions; make sure good safety suggestions are used and that all safety questions receive answers; and encourage employees to submit any safety suggestions through the Employee Suggestion Program.
6. Ensure all accidents are promptly and thoroughly investigated and properly reported.
7. Keep informed on safety subjects through reading, training courses, and discussions with other supervisors and safety professionals.

C. Employees. Ultimately, every employee is responsible for his own safety. As a condition of employment, employees are required to observe all safety regulations and requirements given verbally or in writing by the properly constituted authorities. Employees shall attend all job required safety training and refresher courses as needed. In addition to guarding their own safety and the City's property, employees shall do everything possible to safeguard their fellow workers and other people affected by their work. Employees shall report immediately to their supervisor any accident occurring to themselves and shall, if observed, report accidents happening to others. Employees shall also report any unsafe conditions to their supervisor immediately.

D. Human Resources Department. The Human Resources Director shall be responsible for the coordination of safety activities and safety programs throughout the City of Phoenix.

**Organization to Implement and Administer Safety Program**

The Human Resources Director shall be responsible for coordinating the development, establishment, improvement, and administration of the City Safety Program. Department directors and their management and supervisory staff, working in conjunction with their department Safety Analysts, are responsible for development, implementation, and operation of the safety programs within their respective departments.

Departmental safety committees may be established within each department and/or large division. Selection of these committees shall be made by the department director. Safety committees may be established in small organizational units at the discretion of department management. Safety committees shall be advisory only.

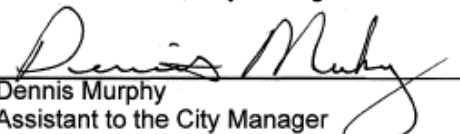
**Operational Procedures**

The provisions of the above sections clarify the authority, responsibility, and organization of the City's Safety Program.

As the representative of management, the Human Resources Director, in cooperation with the department directors and their staff, shall devise, implement, and through periodic revisions, maintain a comprehensive safety program. The minimum objectives of this program shall be to:

- A. Maintain a safe and healthful work environment
- B. Ensure compliance with occupational safety and health standards, regulations, and policies.
- C. Train supervisors to focus attention on preventing accidents and promoting safety.
- D. Formalize in each City activity a set of safety standards for employees to follow in performing their duties.
- E. Educate and motivate employees through their supervisors to work safely.
- F. Establish for each City activity a complete safety inspection program to remove work hazards and correct unsafe conditions, practices, and habits.
- G. Establish and maintain a system for reporting accidents. Analyze accidents to learn cause and prevention.
- H. Solicit suggestions from employees and promptly adopt good ideas which will promote better safety.
- I. Solicit the advice of the safety committees where applicable.
- J. Assist all administrative and supervisory personnel in developing and maintaining an effective safety program.
- K. Administer corrective action, up to and including disciplinary action for non-compliance with established safety standards, regulations and policies.
- L. Collect and distribute safety training material, safety educational aids, safety posters, and safety literature to supervisors.
- M. Ensure employees receive the appropriate safety and health training necessary for their job and that all safety and health training is properly documented.

DAVID CAVAZOS, City Manager

By:   
Dennis Murphy  
Assistant to the City Manager

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## City of Phoenix

SUBJECT	<b>ADMINISTRATIVE REGULATION</b>	A.R. NUMBER
		2.311Revised
		FUNCTION
		Personnel and Payroll
	<b>VEHICLE ACCIDENT REPORTING PROCEDURES AND ACTION AT SCENE OF COLLISION</b>	Page 1 of 4
		EFFECTIVE DATE
		January 14, 2003

### INTRODUCTION

#### Transmittal Message

This Administrative Regulation (AR) has been revised to streamline the vehicle accident reporting process. Questions regarding this AR should be directed to the Finance Department – Risk Management Division at (602) 262-5054.

#### Summary of Changes

This AR was last revised in 1988. The revised AR eliminates references to report forms and employee titles that no longer exist. Additionally, it refers employees to the City's Intranet for completion and submittal of required forms.

The revisions instruct employees involved in an accident to notify the Police Department who will assess the situation and evaluate the scene for a wrecker, paramedics or ambulance. It also eliminates reference to the potentially hazardous practice of using a police car to push a damaged vehicle to the side of the road.

Finally, the revision eliminates confusion between reporting an accident and submitting a claim.

#### Purpose

This regulation establishes uniform procedures for reporting all accidents involving City-owned or privately-owned motor vehicles used on City business. This regulation further establishes procedures for moving drivable vehicles out of the traveled way following a collision, for calling wreckers to move non-drivable vehicles away from the scene of collision as rapidly as possible, and for moving the vehicle to the Equipment Management Yard for damage inspection.

### 1. Regulations

#### A. Reporting Requirements

- i. All motor vehicle accidents involving City-owned or privately-owned motor vehicles while being used on City business occurring on public streets or on private property, inside the City limits, shall be reported immediately to the Police Department and the employee's supervisor. Serious, life threatening accidents should be reported to Police using 911. For minor accidents that are non-life threatening, contact the Police Department at (602) 262-6151.

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Personnel and Payroll  
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Advise the Police Department that the accident involves a Phoenix-owned vehicle or vehicle used on City business and relay as clearly as possible the severity of the accident and whether fire or medical services are needed.

The Police Department will respond to the scene and determine whether or not they will make a report. When the Police do not take a report, obtain the following information before leaving the accident scene.

- a. Names, addresses, drivers license numbers and phone numbers of all parties
- b. Make, model, year and license plate number of all vehicles
- c. Damage to all vehicles
- d. Injuries to any parties and where treated if applicable
- e. Insurance company and policy numbers of all parties involved
- f. Names, addresses and phone numbers of witnesses, if available

If outside the City limits, the employee shall report the accident immediately to the local jurisdiction and their supervisor. All other procedures contained in this Administrative Regulation still apply.

- ii. Accidents involving City-owned motor vehicles shall also be reported to Risk Management and Equipment Management within two workdays of their occurrence by use of the Equipment Management Vehicle Damage Report, Form 125-40D (also known as the "Incident Report"). This form is used to report both property damage and bodily injury resulting from a collision. This four-part form must be completed by the employee/driver or supervisor immediately after the accident. At least one copy shall be kept by the employee's/driver's department, and that department is responsible for sending one copy to Risk Management, one copy to Equipment Management and one copy to the Personnel Department, Safety Section.

The Equipment Management Vehicle Damage Report Form may also be submitted electronically via the City's Intranet, e-mail, or hard copy sent through interoffice mail. A copy should be retained for departmental records.

It is important that the report form provide clear and concise information of the facts of the incident, as well as complete and accurate information concerning the person(s) and property involved.

- iii. A supervisor, with the support of the Department Head, should respond to the scene of an accident involving their department personnel to assist the Police in any way possible.
- iv. All accident reports will be reviewed and chargeability determined the Personnel Department, Safety Section, Fleet Safety Specialist. The Police Department shall prepare four (4) copies of the Arizona Traffic Accident Report on all motor vehicle accidents.

The Arizona Traffic Accident Reports will be distributed as follows:

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All City Vehicles and All Vehicles Used On City Business:

- a. One copy to Equipment Management (if a City-owned vehicle is involved)
- b. One copy to Personnel Department, Safety Section
- c. One copy to Finance Department, Risk Management Division
- d. One copy (or more copies as desired) to the department involved in the accident
- v. Do not make statements to anyone except your supervisors and the investigating Police Officers. The determination of the cause will be done as part of the investigation process.
- vi. Any person who wishes to make a claim against the City must follow the procedures set forth in A.R.S. 12-821.01. Persons who state that they want to make a claim for injuries or property damage should be given a "Referral Card," Form 45-11D, which provides the Risk Management Division's phone number to call for a claim form. The employee's name and work phone number should be written in the space provided on the Referral Card.

All field supervisors should maintain a supply of Referral Cards.

**B. Additional Information**

On occasion, additional information may be needed on a particular accident other than what would be needed for normal processing of accident claims. When the need arises, the Safety Section and/or Risk Management Division will request this information from the Department involved.

Department Heads may require their supervisors and/or operators to submit a separate report on accidents involving their personnel for the Department's internal use.

A packet containing the "Equipment Management Vehicle Damage Report" Forms and Referral Cards will be placed in each vehicle by Equipment Management.

**C. Fatal Accidents Involving City Vehicles or Equipment**

When a City vehicle or private vehicle being used on City business is involved in an accident resulting in a fatality, the Police Department will immediately notify the Personnel Department, Safety Section. If the accident occurs outside of normal duty hours, the notification will be made to the City switchboard operator. The City switchboard operator will maintain a current list of names and telephone numbers of people to contact within the Safety Section. The Police Department will notify the Risk Management Division the next business day.

**D. Legal Information**

The Law Department shall have access to all accident reports filed with the Safety Section and/or Risk Management Division whenever necessary.

The employee is forbidden to act as an agent of the City under any circumstances. Before an employee releases an insurance company for injuries sustained while in a City vehicle,

the employee must confer with the Law Department to make certain that the release form does not purport to reduce the City's rights to recover damages.

## **2. Action at Scene of Collision**

### **A. Objective**

To minimize traffic congestion or the possibility of contributing to further accidents at the scene, the following procedure is to be followed:

- i. **Drivable Vehicles** Drivable vehicles should be moved to the side of the road out of the way of traffic, prior to arrival of police.
- ii. **Non-Drivable Vehicles** In the event one or more vehicles are non-drivable, the Police Officer(s) responding to the scene will call for a wrecker.
- iii. **Injury Accidents** In a collision in which a person complains of an injury or in which a serious injury exists, the vehicle containing the injured persons should not be moved. When reporting the accident to "911," notify them that an ambulance is needed and how serious the injuries seem to appear.
- iv. **Non Injury Accidents** All non-injured drivers and passengers should move to the sidewalk or other safe location out of the roadway as soon as possible. Employees should not return to the vehicle to retrieve items until clear to do so.
- v. **General**
  - a. Attempt to secure witnesses' names, addresses and phone numbers.
  - b. Do not make statements to anyone except your supervisors and the investigating Police Officers. Avoid getting into arguments with others at the scene.
  - c. Answer the Police Officer's questions honestly and directly. Do not admit any responsibility or guilt for the accident at the scene. Responsibility for the accident will be determined at a later time and place.
  - d. Make arrangements with the Equipment Management Body Shop to have the City vehicle taken to the Equipment Management Yard. The vehicle should be moved to the Equipment Management Yard within two workdays after the accident occurs.

FRANK FAIRBANKS, City Manager

By 

Lisa Takata  
Assistant to the City Manager

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## City of Phoenix

<b>ADMINISTRATIVE REGULATION</b>		A.R. NUMBER
		3.51
SUBJECT		FUNCTION
		Financial and Purchasing Page 1 of 3
<b>RISK MANAGEMENT</b>		EFFECTIVE DATE
		November 20, 2001

**INTRODUCTION**

**Transmittal Message**  
Questions regarding this AR should be directed to the Finance Department – Risk Management Division at (602) 262-5054.

**Summary of Changes**  
This AR was last revised in 1988. The revisions note a new direct reporting relationship between Risk Management Administrator and the Finance Director. It also clarifies and updates the responsibilities of the Risk Management Administrator.

**Purpose**  
This Risk Management policy has been established to achieve an optimum balance among the various elements of the City's Risk Management Program, such as: self-insured losses, loss control and loss prevention costs, claims control costs, insurance premiums and the cost of administration.

**Responsibility**  
The following people are responsible for the Risk Management Program:

A. The Finance Director provides overall direction.

B. The Risk Management Administrator is responsible for general administration such as coordinating, directing and implementing risk management activities, including:

1. Risk identification, analysis and measurement.
2. Risk financing, including the purchase of commercial insurance for all City-related exposures, except group medical, life, disability and Worker's Compensation insurance for City employees.
3. Consulting for risk financing including assisting the Personnel Department in the purchase of insurance for the City's employee, dependent and retiree benefits.
4. Management of 3<sup>rd</sup> party liability claims and tort litigation in cooperation with the City Attorney's Office.
5. Coordinate and assist in resolution of insurance claims made against property and liability insurance policies purchased by the Risk Management Division.

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6. Processing City claims against others and/or their insurance carriers for damage to City property when requested by the department sustaining the damage.
  7. Manage the Self-Insured Retention Funds to assure that adequate funding levels are maintained and insurance and self-insurance costs are allocated to the City departments.
  8. Investigation and settlement of third-party liability claims (except charges filed with the Equal Employment Opportunity Commission ) filed against the City and selection and management of a third party claims administrator for the handling of other liability claims.
  9. Liaison for establishing City property conservation standards with City property insurance carriers and departments.
  10. Provide loss control data and loss control consultations to all City departments.
  11. Coordinate and participate on the City's Self-Insurance Retention Claims Committee.
- C. Department Heads are responsible for insuring that risk management related activities are coordinated with the Risk Management Administrator.

Cooperation is needed at all levels to identify risks of loss and reduce or eliminate those risks.

#### **Operational Policy**

##### **A. Purchasing Insurance or Other Risk Financing Alternatives**

Whenever risks of loss are identified, they shall be reduced or eliminated wherever practical. For risks of a catastrophic nature, insurance or other risk financing alternatives shall be purchased or implemented at the lowest reasonable cost.

##### **B. Risk Retention**

In recognition of its financial resources, the spread of its physical assets and prudent municipal practices, the City shall accept self retention of loss up to the limits established by the Finance Director and Risk Management Administrator, based on risk retention analysis. The self-insured retention levels and commercial insurance policy limits shall be established based on prudent judgment and appropriate economic considerations.

In addition, in selecting the actual self-insured retention limit for a specific risk consideration shall be given to the extent such insurance is available at reasonable cost, frequency and severity of loss experience, and the extent and nature that such services as claims handling, legal services, and other specialized services are required and available either in-house or through outside agencies.

##### **C. Claims Management**

1. Claims for damages arising out of injuries to the public, including personal injury, or damage to private property are administered by the Risk Management Division. The City Attorney's Office and Risk Management Division coordinate the management of cases in litigation. The objective is to minimize the financial loss to the City, recognizing both the well-being of the public and the need for financial stability of the City. The Risk Management Administrator shall coordinate claims management with the City Self-Insurance Retention Claims Committee in accordance with Chapter 42 of the City Code.



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- A. All City employees are responsible for reporting incidents promptly in accordance with Administrative Regulation 2.311 and 2.317 and assisting the Risk Management Division in investigation.
- B. Legitimate liability claims are to be settled equitably and promptly. Claims believed to be without merit will be vigorously defended.
- 2. Employee Worker's Compensation insurance claims are administered by the Safety Administrator in the Personnel Department.
- D. Loss Control

It is the policy of the City of Phoenix to preserve City-owned property through the implementation of sound property loss prevention practices and to control, reduce and eliminate exposure to loss from liability risks to the extent possible. The Risk Management Administrator is responsible for:

- 1. Coordination of the City's efforts toward the prevention of property loss, and control and reduction of liability risks.
- 2. Coordination of the efforts of City property and liability insurance carriers with City departments in performing insurance loss control surveys and implementing insurance carrier recommendations.
- 3. Coordination and implementation of local, state and federal regulations related to property loss prevention and control and reduction of liability risks.

FRANK FAIRBANKS, CITY MANAGER

BY   
Lisa Takata  
Assistant to the City Manager

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#### F-4. Public Transit Department Facility Inspection Report



Public Transit Department Facility Inspection Report				
Date:	Facility			
Inspector –				
FACILITY EXTERIOR	MET	NOT MET	N/A	COMMENTS (general cleaning/safety attire/spills/restrooms)
Employee/Support Vehicle Parking Lots				
Fare Collection Building				
Landscaping				
Security Kiosk				
Bus Wash Area				
Fuel Island/Building				
Dispensing Equipment Condition				
Bus Parking Lot				
Maintenance Area/Building				
Warehouse				
Loft				
HR Area/Building				
Revenue/Video Surveillance				
FACILITY INTERIOR				(water fountains/storage areas)
Visitor Reception Area				
Conference Room				
Printer Room				
Individual Offices/Cubicles				
Restrooms				
Driver's Lounge				
Locker Area				
Dispatch Area				