

Agency Safety Plan

Baldwin Regional Area Transit System



Baldwin Regional Area Transit System Public Transportation Agency Safety Plan

Version 5

Updated December 10, 2024

In compliance with 49 CFR Part 673

Initial Plan Developed by the
Alabama Department of Transportation
in conjunction with
The University of Alabama at Huntsville

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1. EXECUTIVE SUMMARY

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

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

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

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. All levels of management, administration and operations are responsible for the safety of their clientele and themselves. To improve public transportation safety to the highest practical level in the State of Alabama and comply with FTA requirements, the Alabama Department of Transportation (ALDOT) has developed this Agency Safety Plan (ASP) in collaboration with Baldwin County Commission (BCC) and Baldwin Regional Area Transit System (BRATS).

To ensure that the necessary processes are in place to accomplish both enhanced safety at the local level and contribute to the goals of the NSP, the BCC and BRATS adopt this ASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP). While safety has always been a primary function at BRATS, this document lays out a process to fully implement an SMS that complies with the PTASP final rule.

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A. Plan Adoption – 673.11(a)(1)

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

Ann Simpson, Director of Transportation

12/10/2024

ACCOUNTABLE EXECUTIVE SIGNATURE

DATE

Since BRATS is considered a department of Baldwin County, the main governing body is the Baldwin County Commission. Approval of this plan revision by the Baldwin County Commission occurred on January 7, 2025, and is documented in minutes of the Commission Meeting found in Appendix C.

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

Baldwin County Commission originally approved the Baldwin Regional Area Transit System (BRATS) Public Transportation Agency Safety Plan (PTSAP) on April 21, 2020.

The Baldwin County Commission approved the BRATS PTASP Version 2 on December 21, 2021.

The Baldwin County Commission approved the BRATS PTASP Version 3 on December 20, 2022.

The Baldwin County Commission approved the BRATS PTASP Version 4 on January 2, 2024.

The Baldwin County Commission approved the BRATS PTASP Version 5 on January 7, 2025, as evidenced by Commission approval shown in Appendix C of this plan.

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2. TRANSIT AGENCY INFORMATION – 673.23(D)

BRATS makes every effort to serve the needs of all the citizens of Baldwin County. Anyone of age and ability is eligible to enjoy the public transit system. The transit program provides many with increased independence, supports an active lifestyle, reduces traffic congestion, helps protect the local environment and provides greater access to our community. BRATS provides county-wide Demand Response transportation between 6 am and 5 pm, Monday through Friday.

As Baldwin County's only public transit system, BRATS also assists the community during emergency evacuations. Funding for BRATS is provided by the Baldwin County Commission and FTA grants as a direct recipient and as a sub-recipient of funds administered by ALDOT.

Table 1 contains agency information, and an organizational chart for BRATS is provided in Figure 1.

Table 1: Agency Information

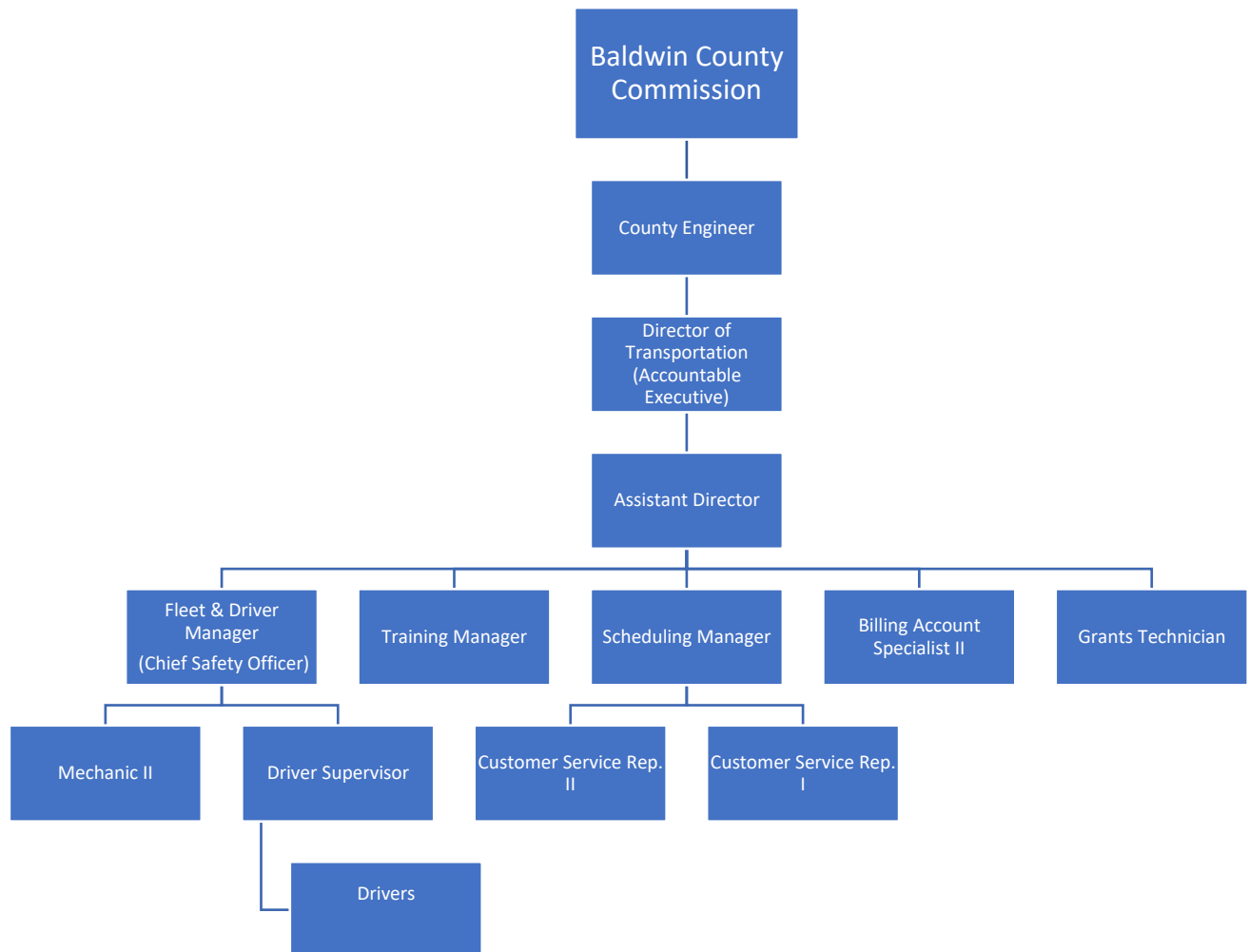
Information Type	Information
Full Transit Agency Name	Baldwin Regional Area Transit System
Transit Agency Address	18100 County Road 54, Robertsedale, Alabama 36567
Name and Title of Accountable Executive 673.23(d)(1)	Ann Simpson, Director of Transportation
Name of Chief Safety Officer or SMS Executive 673.23(d)(2)	Ron Stewart, Fleet & Driver Manager
KEY STAFF	Loren Lucas, Asst. Director Lenzy Williams, Training Manager Joy Callaway, Driver Supervisor Sarah Middleton, Scheduling Manager
Mode(s) of Service Covered by This Plan 673.11(b)	Demand Response
List All FTA Funding Types (e.g., 5307, 5310, 5311)	5311 and 5307
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Demand Response
Does the agency provide transit services on behalf of another transit agency or entity?	NO
Vehicles Operated at Maximum Service	Approximately 30

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Figure 1: BRATS Organizational Chart



Authorities & Responsibilities – 673.23(d)

BRATS has established the necessary authority, accountabilities, and responsibilities for the management of safety amongst the key individuals within the organization, as those individuals relate to the development and management of our SMS. In general, the following defines the authority and responsibilities associated with our organization.

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

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The **Chief Safety Officer (CSO)** is an adequately trained individual who has the authority and responsibility as designated by the Accountable Executive for the day-to-day implementation and operation of BRATS' SMS.

Additional Agency leadership and executive management, who have authority or responsibility for day-to-day implementation and operation of our agency's SMS are the Assistant Director, Scheduling Manager, Training Manager, and Driver Supervisor.

In addition to the BRATS staff, the Baldwin County Commission employs a full-time Safety Coordinator and Risk Manager that work with employees, county-wide. The BRATS designated CSO works closely with the County Safety Coordinator and Risk Manager throughout the SMS process. The County hosts periodic countywide Safety Committee meetings. The BRATS CSO is an active member of the County Safety Committee.

All non-driver BRATS team members provide essential support to the Accountable Executive, and CSO, in developing, implementing, and operating the agency's SMS to varying degrees.

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

The **Risk Management Team** and **Safety Committee** referred to in this document are synonymous and are composed of the BRATS management team. Management meetings are held regularly where new and outstanding safety issues and performance are addressed.

Further details regarding specific responsibilities at the Management, Supervisor and Employee levels have been provided in Section VII of the *Baldwin County Employee Handbook* and the *Position Descriptions* (Appendix A, Table 7 lists the document name).

3. SAFETY POLICIES AND PROCEDURES

A. Safety Management Policy – 673.23(a)

Safety is BRATS' top priority. BRATS is committed to implementing, developing, and improving strategies, management systems, and processes to ensure that all activities uphold the highest level of safety performance and meet required safety standards. BRATS is committed to the following safety objectives:

- We will develop and embed a safety culture in our activities that recognizes the importance and value of effective safety management and acknowledges that safety is paramount.
- Communicate to staff the purpose and benefits of the Safety Management System (SMS) and their responsibilities for the operation of the Safety Management System.

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- For passengers and employees, we will minimize the safety risk associated with transit service to as low as reasonably practicable and we will work to comply with legislative and regulatory requirements and standards.
- Work to ensure that all employees are provided with adequate and appropriate safety information and training, are competent in safety matters, and are only allocated tasks commensurate with their skills.
- Establish safety performance targets to help measure the overall effectiveness of our processes and ensure we meet our safety objectives.
- Provide a culture of open reporting of safety concerns, ensuring that no adverse action will be taken against any employee who discloses a safety concern through BRATS' Employee Safety Reporting Program (ESRP), unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.
- Provide appropriate management involvement and the necessary resources to establish an effective ESRP that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Communicate safety performance to the entire BRATS organization.

I. Employee Safety Reporting Program – 673.23(b)

Frontline employees are a significant source of safety data. These employees are typically the first to identify unsafe conditions that arise from unplanned conditions either on the vehicles, in the maintenance shop, or in the field during operations. BRATS has implemented a process that allows employees to report safety conditions to senior management, provides protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.

REPORTING PROCESS

BRATS' *Team Member Manual* describes the steps an employee should take to provide any type of employee feedback. The *Baldwin County Employee Handbook* sets forth Safety Rules (see Page VII-11 & VII-12) which require employees to "report unsafe acts and unsafe conditions to the department supervisor immediately." The *BRATS Team Member Manual* reinforces this requirement. However, employees are not penalized or discouraged from reporting a safety concern at any time after-the-fact.

Team Members have two options for reporting a safety concern:

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- 1) One option is to call and report the safety concern to the Director of Transportation (Accountable Executive), the Driver & Fleet Manager (CSO), the Driver Supervisor, Customer Service Manager, or any agency leadership or key staff. The individuals who receive this verbal report will document the details in the BRATS Team Member Portal using the electronic Safety Concern Form.
- 2) Another option is to self-report by completing the electronic Safety Concern form available on the BRATS Team Member Portal which is accessible on the driver mobile devices.

PROTECTION FOR TEAM MEMBERS WHO REPORT

All feedback given by BRATS team members is treated as highly valuable information and therefore is protected and made available to all BRATS leadership. Protecting the integrity of the reporting process is continually stressed across the entire team.

A Team Member can elect to remain anonymous under either of the two reporting options. Any Team Member who retaliates against another Team Member based on a reported safety concern, will receive disciplinary action, including potential termination.

EMPLOYEE BEHAVIORS THAT MAY RESULT IN DISCIPLINE:

In general, *BRATS Team Member Manual*, in conjunction with the *Baldwin County Employee Handbook*, will provide guidance indicating what employee behaviors are not protected and may result in discipline.

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

BRATS 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 our SMP throughout the agency.

This communication strategy will include posting the policy in prominent work locations (which may include electronic locations) for existing employees and including the policy statement to the onboarding material for all new employees. In addition, the policy statement will become part of our regular safety trainings and other safety communications efforts. The policy will be signed by the Accountable Executive so that all employees know that the policy is supported by management.

B. PTASP Development – 673.11(d)

This PTASP was developed by ALDOT, on behalf of the Baldwin County Commission and Baldwin Regional Area Transit System (BRATS) in accordance with all requirements stated in 49 CFR Part 673 applicable to a small public transportation provider. ALDOT mailed a formal call for participation in a State sponsored PTASP development process to all Alabama Section 5307 small bus transit agencies on January 15, 2019 and followed that call with a series of phone calls and additional correspondence. BRATS provided a letter to ALDOT opting into participation on March 15, 2019 and was an active

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participant in the development of this plan through sharing existing documentation and participating in communication and coordination throughout the development of the plan. The BRATS documentation used in the development of this plan is presented in Table 7, in Appendix A. Once the documents were reviewed, an on-site interview was conducted with BRATS to gain a better understanding of the agency and agency personnel. This understanding was necessary to ensure that the ASP was developed to fit BRATS' size, operational characteristics, and capabilities. The draft ASP was delivered to BRATS in January 2020 for review and comment. Once the review was completed and adjustments made, the final document was delivered to BRATS for review and adoption.

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

C. PTASP Annual Review – 673.11(a)(5)

As part of BRATS' ongoing commitment to fully implementing SMS and engaging our employees in developing a robust safety culture, BRATS will review the ASP and supporting documentation annually. The review will be conducted as a precursor to certifying to FTA that the ASP is fully compliant with 49 CFR Part 673 and accurately reflects the agency's current implementation status. Certification will be accomplished through BRATS' annual Certifications and Assurances reporting to FTA.

The ASP will be jointly reviewed by the BRATS management team each year. If updates to the ASP are required, the changes will be noted, the Accountable Executive will review the changes, sign and date the updated ASP, and forward to the County Commission for review and approval. If the annual review results in no updates, the date of the review will be documented in Appendix B.

The annual ASP review consist of the activities provided below in Table 2.

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Table 2: ASP Annual Update Activities

Task
Review Agency Operations
Review SMS Documentation <i>Safety Policy;</i> <i>Risk Management;</i> <i>Safety Assurance; and</i> <i>Safety Promotion.</i>
Review Previous Targets and Set or Continue Targets
Report Targets to NTD, ALDOT, Eastern Shore Metropolitan Planning Organization
Make Any Necessary Adjustments to PTASP
Update Version No., Adopt & Certify Plan Compliance

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

Table 3: ASP Record of Changes

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
Header	Text	Text	Text	Text
Header	Text	Text	Text	Text
Header	Text	Text	Text	Text

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

D. PTASP Maintenance – 673.11(a)(2); (c)

BRATS will follow the annual review process outlined above and adjust this ASP as necessary to accurately reflect current implementation status. This plan will document the processes and activities related to SMS implementation as required under 49 CFR Part 673 Subpart C and will make necessary updates to this ASP as BRATS continues to develop and refine the SMS process.

E. PTASP Documentation and Recordkeeping – 673.31

BRATS will maintain documents that set forth our Agency Safety Plan, including those related to the implementation of BRATS' SMS, and results from SMS processes and activities. BRATS will also maintain documents that are included in whole, or by reference, that describe the programs, policies, and

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procedures that the agency uses to carry out our ASP and all iterations of those documents. These documents will be made available upon request to the FTA, other Federal entity, or ALDOT. BRATS will maintain these documents for a minimum of three years after they are created. These additional supporting documents are cataloged in Appendix A and the list will be kept current as a part of the annual ASP review and update.

F. Safety Performance Measures – 673.11(a)(3)

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

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

Table 4: NSP Safety Performance Measures

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

Table 5 presents BRATS Safety Performance Targets based on the review of the previous 5 years of BRATS safety performance NTD data (2020-2024).

Table 5: BRATS Demand Response Safety Performance Targets

Safety Performance	Fatalities (total)	Fatalities Rate per Total VRM*	Injuries (total)	Injuries Rate per Total VRM*	Safety Events (total)	Safety Events Rate per Total VRM*	System Reliability (Mean Distance Between Major Mechanical Failure**
TARGET	0	0	0	0	0	0	75,000 revenue miles
ACTUAL (5 YR AVG)	0	0	10	.000005	10	.000005	62,677 revenue miles

*rate = total number of fatalities/injuries/events for the period 2020-2024/total revenue vehicle miles traveled for same period

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****Vehicle Revenue Miles for 2020-2024 / Major Mechanical Failures for 2020-2024**

As part of the annual review of the ASP, BRATS will reevaluate safety performance targets to determine if they should be refined.

G. Safety Performance Target Coordination – 673.15(a)(b)

BRATS will report our SPTs to ALDOT and the Eastern Shore Metropolitan Planning Organization (MPO) to aid in their respective regional and long-range planning processes. BRATS personnel are available to coordinate with ALDOT and the MPO in the selection of State and MPO SPTs upon request.

Each year during the FTA Certifications and Assurances reporting process, BRATS will transmit any updates to our SPTs to both the Eastern Shore MPO and ALDOT (unless those agencies specify another time in writing).

4. SAFETY MANAGEMENT SYSTEMS – 673 SUBPART C

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

SMS is comprised of four basic components – Safety Management Policy (SMP), Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP). The SMP and SP are the enablers that provide structure and supporting activities that make SRM and SA possible and sustainable. The SRM and SA are the processes and activities for effectively managing safety as presented in Figure 2.

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Figure 2: Safety Management Systems



Implementing SMS at BRATS will be a major undertaking over the next several years. This ASP is the first step to putting in place a systematic approach to managing the agency's risk. BRATS has already taken several steps to implement SMS, such as developing this initial ASP, designating a CSO, identifying SMS roles and responsibilities, key stakeholder groups and key staff to support this process.

A. Safety Risk Management – 673.25

By adopting this ASP, BRATS is establishing the SRM process presented in Figure 3 for identifying hazards and analyzing, assessing, and mitigating safety risk in compliance with the requirements of 49 CFR Part 673.25.

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Figure 3: Safety Risk Management Process



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

Figure 4: Draft Risk Register

Hazard	Type	Likelihood	Consequence	Resolution

What is wrong?

What could happen

What could mitigate this?

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



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I. Safety Hazard Identification – 673.25(b)

In the SRM process, a Hazard is any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infra-structure of a public transportation system; or damage to the environment.

Hazard identification focuses on out of the norm conditions that need special attention or immediate action, new procedures or training to resolve a condition that is unacceptable and return conditions to an acceptable level. BRATS uses a variety of mechanisms for identifying and documenting hazards, namely:

- Through training and reporting procedures, BRATS ensures personnel can identify hazards and that each employee clearly understands that they have a responsibility to immediately report any safety hazards identified to their supervisors. Continued training helps employees to develop and improve the skills needed to identify hazards.
- Employee hazard training coupled with the Employee Safety Report Program (ESRP) ensures that BRATS has full use of information from frontline employees for hazard identification.
- Upon receiving the Safety Concern, the reported concern/hazard will be directed to the CSO for entry into the risk register for risk assessment, classification, and possible mitigation.
- Standard reporting forms include (e.g. Pre- and Post-trip Inspection Forms and Driver Request for Vehicle Service where drivers can request specific maintenance work for safety hazards identified in pre- or post-trip inspections such as low fluids or soft brakes) and other reports completed on a routine basis by administrative, operational and maintenance employees. The *BRATS Team Member Manual* contains procedures for flagging and reporting hazards as a part of day-to-day operations.
- The CSO, in conjunction with Agency Leadership, perform safety assessments and recommend methods to reduce identified hazards.
- BRATS uses Safety Concern reports and records associated with the event to determine specific areas of training that need to be covered with employees to ensure safety hazard identification is continually improved, and so that hazards are identified before an event recurrence.
- Safety Concern reports are also analyzed by the safety committee to identify any recurring patterns or themes that would help to identify underlying hazards and root causes of the event that can be mitigated to prevent recurrence.
- The CSO, risk management personnel, and subject matter experts are also encouraged to participate in available professional development activities and peer-to-peer exchanges as a source of expertise and information on lessons learned and best practices in hazard identification.
- Other sources for hazard identification include:



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- ESRP
- Inspections of personnel job performance, vehicles, facilities and other data
- Observations from supervisors
- Investigations of safety events
- Review of monthly performance and safety data
- Training and evaluation records
- Review of vehicle video footage
- Audits of vehicles and facilities
- External sources of hazard information could include:
 - FTA and other federal or state authorities
 - Reports from passengers or the general public
 - Safety bulletins from manufacturers or industry associations

The Chief Safety Officer may conduct further analyses of hazards and consequences entered into the Safety Risk Register to collect information and identify additional consequences and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, the Chief Safety Officer may:

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

In addition to identifying the hazard, the hazard identification process also classifies the hazard by type (organizational, technical or environmental) and subcategory when necessary.

II. Safety Risk Assessment – 673.25(c)

BRATS has established methods to assess the likelihood and severity of the consequences of identified hazards, and prioritize the hazards based on the safety risk. The process continues the use of the risk register to address the next two components.

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To accurately assess a risk of specific positions, the Baldwin County Personnel Department performs Job Safety and Health Analysis (JSHA) on different job descriptions, which it reviews on a periodic basis. The JSHA sets a baseline of potential hazards that might be encountered in specific positions. As stated in the *Baldwin County Employee Handbook*, JSHA is simply the study of job-related tasks and possible hazards and the implementation of methods to reduce the identified hazards.

To accurately assess a risk, BRATS performs investigations of accidents or crashes and reported safety concerns. Safety risk is based on an assessment of the likelihood of a potential consequence and the potential severity of the consequences in terms of resulting harm or damage. The risk assessment also considers any previous mitigation efforts and the effectiveness of those efforts. The results of the assessment are used to populate the third and fourth components of the Risk Register as presented in Figure 5.

Figure 5: Safety Risk Assessment Steps in Populating the Risk Register

Hazard	Type	Likelihood	Consequence	Resolution

The risk assessment is conducted by the CSO and the safety committee supplemented by subject matter experts from the respective department or section to which the risk applies. The process employs a safety risk matrix, similar to the one presented in Figure 6, that allows the safety team to visualize the assessed likelihood and severity to help decision-makers understand when actions are necessary to reduce or mitigate safety risk.

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Figure 6: Safety Risk Assessment Matrix

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

This matrix expresses assessed risk as a combination of one severity category and one likelihood level, also referred to as a hazard rating. For example, a risk may be assessed as “1A” or the combination of a Catastrophic (1) severity category and a Frequent (A) probability level. This matrix also categorizes combined risks into levels, High, Medium, or Low, based on the likelihood of occurrence and severity of the outcome.

For purposes of accepting risk:

- “High” hazard ratings will be considered unacceptable and require action from BRATS to mitigate the safety risk,
- “Medium” hazard ratings will be considered undesirable and require BRAT’s Safety Committee to make a decision regarding their acceptability, and
- “Low” hazard ratings may be accepted by the Chief Safety Officer without additional review.

Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk. Once a hazard’s likelihood and severity have been assessed, the CSO enters the hazard assessment into the risk register that is used to document the individual hazard and the type of risk it represents. This information is used to move to the next step, which is hazard mitigation.

III. Safety Risk Mitigation – 673.25(d)

Upon completion of the risk assessment, the CSO and the safety committee continue populating the Risk Register by identifying mitigations or strategies necessary to reduce the likelihood and/or severity of the

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consequences. In this step, the goal is to avoid or eliminate the hazard or, when elimination is not likely or feasible, reduce the assessed risk rating to an acceptable level (Figure 7). However, mitigations do not typically eliminate the risk entirely.

Figure 7: Risk Register Mitigation Component

Hazard	Type	Likelihood	Consequence	Resolution

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

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

Once a mitigation strategy is selected and adopted, the strategy is assigned to an appropriate staff member or team for implementation. The assigned personnel and their specific responsibilities are entered into the risk register under the Resolution section. The CSO is responsible for documenting the mitigation effort including whether the mitigation was carried out as designed and whether the intended safety objectives were achieved. This information is recorded in the appendix to the risk register for use in subsequent safety SA activities and to monitor the effectiveness of the SRM program.

B. Safety Assurance – 673.27 (a)

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

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



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Through our Safety Assurance process, BRATS:

- Evaluates our compliance with operations and maintenance procedures to determine whether our existing rules and procedures are sufficient to control our safety risk;
- Assesses the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and are implemented as intended;
- Investigates safety events to identify causal factors; and
- Analyzes information from safety reporting, including data about safety failures, defects, or conditions.

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

As the first step in the BRATS SA program, BRATS collects and monitors data on safety performance indicators through a variety of mechanisms described in the following sections. Safety performance indicators can provide early warning signs about safety risks. BRATS relies on leading indicators (self inspections, employee safety training, employee reporting of safety concerns, and safety audits and surveys) and on lagging indicators (accident investigations, lost hours/days, property or personal damage claims) which represent negative safety outcomes that should be avoided or mitigated in the future. In addition to the day-to-day monitoring and investigation procedures detailed below, BRATS will review and document the safety performance monitoring and measuring processes as part of the annual update of this ASP.

MONITORING COMPLIANCE AND SUFFICIENCY OF PROCEDURES 673.27 (B)(1)

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

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

- Random Inspections (vehicles & facilities)
- Review of onboard camera footage to assess drivers and specific incidents
- Safety surveys
- ESRP
- Investigation of safety occurrences
- Daily data gathering and monitoring of data related to the delivery of service
- Daily vehicle inspections and preventative maintenance

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

MONITORING OPERATIONS 673.27(B)(2)

Management is required to monitor investigation reports of safety events and SRM resolution reports to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended. If it is determined that the safety risk mitigation did not bring the risk to an acceptable level or otherwise failed to meet safety objectives, then the supervisor resubmits the safety risk/hazard to the SRM process. The CSO will work with the supervisor and subject matter experts to reanalyze the hazard and consequences and identify additional mitigation or alternative approaches to implementing the mitigation.

II. Safety Event Investigation – 673.27(b)(3)

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

BRATS' current investigation process varies depending on the type of safety event. Investigations for Accidents, Incident, and some Occurrences will be based on the *Baldwin County Handbook* guidelines (specifically Section VII, C. Loss and Safety Investigation) which meet current local, state and federal procedural guidelines and requirements, but relies heavily on existing available supporting materials (e.g. driver and witness statements, supervisor reports, police reports, camera footage and electronic device recordings and records, photographs, analysis reports, etc.). The investigation of minor occurrences may be as simple as a phone conversation with the team member who reported the issue.

MONITORING INTERNAL SAFETY REPORTING PROGRAMS 673.27(B)(4)

The Chief Safety Officer and Safety Committee routinely review safety data captured in employee safety inspection reports, safety incident reports, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer and Safety Committee ensure that the concerns are investigated or analyzed through the SRM process. The Chief Safety Officer and Safety Committee also review internal and external reviews, including audits and assessments, with findings concerning safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.



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C. Safety Promotion – 673.29

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

I. Safety Competencies and Training – 673.29(a)

BRATS provides comprehensive training to all employees regarding each employee's job duties and general responsibilities. This training includes safety responsibilities related to their position. In addition, several driver safety meetings are held throughout the year to ensure that safety related information is relayed. This is in addition to the constant communication between management and team members about safety related issues.

As part of SMS implementation, BRATS conducts the following activities:

- Safety Culture Survey
- Conduct a thorough review of all current general staff categories (administrative, driver, supervisor, mechanic, maintenance, etc.) and their safety related responsibilities.
- Assess the training material available on the FTA PTASP Technical Assistance Center website.
- Develop a set of competencies and training required to meet the safety related activities for each general staff category.
- Mandatory onboarding training for new staff with a primary focus on drivers, which includes the following:
 - Admin Orientation and Drive Check
 - Defensive Driving and Safety Course (includes ADA compliance and intensive mobility device securement)
 - Paperwork, Mobile Device used for communicating Schedule/Manifest, and Admin Training
 - Shadowing Existing Drivers, Learning Routes, and Driving with Observer.
- Mandatory training throughout the year including practical skills test and policy and procedure training including the following:
 - Local Rodeo (includes scored driving course and written test)
 - Preventative Maintenance, Pre-trip, and Post Trip Training
 - Mobility Device Securement Testing/Training
 - Annual Safety Training (focus on policies and procedures)

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- Ongoing refresher training or retraining on a routine basis and on a case-by-case basis as determined through Safety Concern reports and investigations. This will apply to all agency personnel and contractors.
- BRATS maintains a training list to track progress on individuals and groups within the organization.
- Adjust job notices associated with general staff categories to ensure that new personnel understand the safety related competencies and training needs and the safety related responsibilities of the job.

II. Safety Communication – 673.29(b)

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

BRATS reports any safety related information to the Baldwin County Safety Committee, and the Baldwin County Commission, at their regular meetings and will begin including safety performance information. In addition, BRATS holds regularly scheduled training meetings with drivers (as outlined above) to ensure that any safety related information is passed along that would affect the execution of their duties. BRATS also posts safety related and other pertinent information in common areas (including electronic postings) for all employees.

BRATS communicates safety and performance information to all staff. Personal information that may be confidential will be limited to distribution among the management team and appropriate County personnel. The determination to send safety information to all employees in a single periodic publication was made after considering the following questions:

What information does this individual need to do their job?

How can we ensure the individual understands what is communicated?

How can we ensure the individual understands what action they must take as a result of the information?

How can we ensure the information is accurate and kept up-to-date?

Are there any privacy or security concerns to consider when sharing information? If so, what should we do to address these concerns?

In addition, BRATS will review our current communications strategies and determine if other procedures are needed. As part of this effort, BRATS has conducted, and will continue to conduct, a safety culture survey to understand how safety is perceived in the workplace and what areas BRATS should be addressing to fully implement a safety culture at our agency.

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5. APPENDIX A

Table 6: PTASP Supporting Documents

Document Name	Document Owner
Eastern Shore MPO 2040 Long Range Transportation Plan	ESMPO
FY 2024-2027 Transportation Improvement Program	ESMPO
Accident Checklist Cover Sheet	BCC
ALDOT Transit Asset Management Plan	ALDOT
Baldwin County Employee Handbook	BCC
BRATS Emergency Response & Evacuation Policy	BRATS
BRATS Maintenance Plan	BRATS
BRATS Zero Tolerance Substance Abuse Policy	BRATS
Collision Report	BRATS
Dispatch Collision/Incident Report	BRATS
Driver Procedure Guidelines / Submittal Process for Mechanical Issues	BRATS
Driver Procedure Guidelines / Wheelchair Securement	BRATS
Driver Procedure Guidelines / Accident & Incident	BRATS
Driver Procedure Guidelines / Complaints	BRATS
Driver Procedure Guidelines / Pre-Trip & Post Trip Paperwork	BRATS
Driver Supervisor Procedure Guidelines / Safety Training	BRATS
New Operator Training Packet	BRATS
Facility Maintenance Plan – Emergency Operations Plan	BCC
Section 5307/5311 Subrecipient Site Visit Checklist	ALDOT
History of Accidents/Incidents	BRATS
Injury/Incident Report	BRATS
Position Descriptions	BRATS
Property Damage/Collision/Injury/Illness Investigation Report	BCC
Public Transit Plan	ESMPO
Standard Operating Procedure Guidelines	BRATS
Employee Protections Referral Memo	US Department of Labor
Mechanics Bus Maintenance Procedure Guidelines	BRATS

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A. Glossary of Terms

The terms below are taken directly from 49 CFR 673.5, Definitions. The meaning of any other terms in this document shall be as defined in the applicable source law, regulation, or manual.

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

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

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

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

Event - any Accident, Incident, or Occurrence.

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

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

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

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

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

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

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Operator of a public transportation system - a provider of public transportation as defined under 49 U.S.C. 5302(14).

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

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

Public Transportation Agency Safety Plan - the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

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

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

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

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

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

Safety Management System (SMS) Executive - a Chief Safety Officer or an equivalent.

Safety performance target - a Performance Target related to safety management activities.

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

Safety risk assessment - the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

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

Serious injury - any injury which:

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

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

State of good repair - the condition in which a capital asset is able to 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 - the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.

B. Additional Acronyms Used

ALDOT: Alabama Department of Transportation

ASP: Agency Safety Plan

BRATS: Baldwin Regional Area Transit System

BCC: Baldwin County Commission

ESRP: Employee Safety Reporting Program

FAST Act: Fixing America's Surface Transportation Act

JSHA: Job Safety & Health Analysis

MAP-21: Moving Ahead for Progress in the 21st Century

MOU: Memorandum of Understanding

MPO: Metropolitan Planning Organization

NSP: National Safety Plan

NTD: National Transit Database

PA: Project Administrator

SOP: Standard Operating Procedure

VRM: Vehicle Revenue Mile

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6. APPENDIX B

A. ASP Record of Changes

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
1		New Document	Matthew Brown	4/21/2020
2	Section 1.A. - Page 5	Update Accountable Executive	Ann Simpson	11/26/2021
2	Section 2 - Page 6	Remove Reference to Zone Transportation	Ann Simpson	11/26/2021
2	Section 2 Table 1 - Page 6	Update Accountable Executive and Key Staff	Ann Simpson	11/26/2021
2	Section 2 Figure 1 - Page 7	Update Organization Chart	Ann Simpson	11/26/2021
2	Section 3.A. - Page 8	Update Safety Management Policy Statement	Ann Simpson	11/26/2021
2	Section 3.C - Pages 11-12	Update and clarify PTASP Annual Review Process	Ann Simpson	11/26/2021
2	Section 3.F Tables 5 & 6 - Page 14	Update Baseline Safety Performance Measures to include 5 years (2016-2021) of NTD data.	Ann Simpson	11/26/2021
2	Section 4.B.I - Page 22	Update to identify leading and lagging safety performance indicators used in Safety Performance Monitoring and Measuring	Ann Simpson	11/26/2021
2	Section 4.C.I - Page 25	Update Safety Competencies and Training schedules	Ann Simpson	11/26/2021
2	Appendix A Table 7 – Pages 27-29	Update Appendix of PTASP Supporting Documents	Ann Simpson	11/26/2021
2	Appendix B - Page 32	Added Appendix B, ASP Record of Changes	Ann Simpson	11/26/2021
2	Appendix C – Page 33	Retitle Board Approval Document from Appendix B to Appendix C. Updated Approval Document for Version 2 of PTASP	Ann Simpson	12/21/2021
3	Section 1. B. – Page 5	Update Certification of Compliance to include Version 3	Ann Simpson	12/20/2022
3	Section 2 Table 1 - Page 6	Update Key Staff	Ann Simpson	12/20/2022

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3	Section 2 Figure 1 - Page 7	Update Organization Chart	Ann Simpson	12/20/2022
3	Section 3.F Table 5, Page 14	Remove Table 5 Baseline SPT based on 2016-2020 data; Renamed Table 6 to 5; Update Table 5 Safety Performance Targets Based on recent 5-year average (2017-2021).	Ann Simpson	12/20/2022
3	Page 17	Expand Safety Hazard Identification Section	Ann Simpson	12/20/2022
4	Section 1. B. – Page 5	Update Certification of Compliance to Version 4	Ann Simpson	12/11/2023
4	Section 2 Figure 1 - Page 7	Update Organization Chart	Ann Simpson	12/11/2023
4	Section 3.F Table 5, Page 14	Update Table 5 Safety Performance Targets Based on recent 5-year average (2018-2022).	Ann Simpson	12/11/2023
5	Section 1. B. – Page 5	Update Certification of Compliance to Version 5	Ann Simpson	12/10/2024
5	Section 3.F Table 5, Page 13	Update Table 5 Safety Performance Targets Based on recent 5-year average (2018-2022).	Ann Simpson	12/10/2024

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7. APPENDIX C

A. Insert Commission Approval Document