'25NOV04 PM 2:04 CITY CLERK

DEPARTMENT OF TRANSPORTATION SERVICES
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October 31, 2025

The Honorable Tommy Waters
Chair and Presiding Officer
and Members
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawai'i 96813

Dear Chair Waters and Councilmembers:

SUBJECT: Draft Resolution to the City Council for Approval of the Agency Rail Safety Plan for Rail Operations

The Department of Transportation Services (DTS) submits for your review and appropriate action a draft resolution requesting the Council's approval of the DTS Agency Rail Safety Plan (ARSP) for rail operations. The Federal Transit Administration requires DTS to prepare this plan and request approval by the City's governing entity, the Honolulu City Council.

The ARSP was prepared in accordance with the requirements and guidelines of 49 CFR Part 673 Public Transportation Agency Safety Plans (Part 673), 49 CFR Part 674 State Safety Oversight (Part 674), and the Hawaii Department of Transportation Program Standards and Procedures, which describe the safety-related policies, responsibilities, and activities for the DTS rail operations. Parts 673 and 674 require public transportation agencies, which receive Federal financial assistance under 49 USC Chapter 53 to develop, implement, and maintain an ARSP based on the principles of Safety Management System (SMS). SMS ensures each public transportation agency, regardless of its size or service environment, has the necessary organizational structures, accountabilities, policies, and procedures in place to direct and control resources for safety management.

DTS notes that similar and corresponding ARSPs for rail operations were submitted for Council approval on two previous occasions. The Council approved a plan in 2023 through its adoption of Resolution No. 23-38 on April 19, 2023, and approved a plan in 2024 through its adoption of Resolution No. 24-131 on June 5, 2024.

Should you have questions, please contact me at (808) 768-8303.

Very truly yours,

J. Roger Morton
Director

Attachment

APPROVED:

Michael D. Formby, Managing Director
Office of the Managing Director

HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

No. _____

RESOLUTION

APPROVING THE DEPARTMENT OF TRANSPORTATION SERVICES' AGENCY RAIL SAFETY PLAN FOR RAIL OPERATIONS REQUIRED BY 49 CFR PART 673, 49 CFR PART 674 AND HAWAII DEPARTMENT OF TRANSPORTATION PROGRAM STANDARDS AND PROCEDURES.

WHEREAS, 49 Code of Federal Regulations ("CFR") Part 673, Public Transportation Agency Safety Plans, and 49 CFR Part 674, State Safety Oversight (collectively, "Parts 673 and 674"), require public transportation agencies, which receive federal financial assistance under 49 U.S. Code Chapter 53, to develop, implement, and maintain a Public Transportation Agency Safety Plan ("PTASP"); and

WHEREAS, the Department of Transportation Services ("DTS"), as a recipient of Federal Transit Administration ("FTA") financial assistance for the public transit system of the City and County of Honolulu ("City"), must prepare and submit to the FTA a PTASP for rail operations, which is compliant with Parts 673 and 674, and prepare and submit to the Hawaii State Department of Transportation ("HDOT") a PTASP compliant with the HDOT Program Standards and Procedures; and

WHEREAS, by Resolution No. 23-38, adopted on April 19, 2023, and by Resolution No. 24-131, adopted on June 5, 2024, the Honolulu City Council ("Council") approved the DTS Agency Rail Safety Plan ("ARSP") for rail operations in the respective years, which were prepared in compliance with the requirements set forth in Parts 673 and 674 and the HDOT Program Standards and Procedures; and

WHEREAS, DTS has prepared an updated ARSP for rail operations for 2025, which must be approved by the Council, as governing entity of the City, prior to submission to the FTA; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that the updated Agency Rail Safety Plan for rail operations is hereby approved in substantially the form attached hereto as Exhibit A; and

BE IT FURTHER RESOLVED that the Director of Transportation Services may execute any incidental or related amendments, agreements, or documents in furtherance of the updated Agency Rail Safety Plan for rail operations; and

HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

No. _____

RESOLUTION

BE IT FINALLY RESOLVED that a copy of this resolution be transmitted to the Director of Transportation Services.

INTRODUCED BY:

_____

_____

_____

_____

_____

_____

DATE OF INTRODUCTION: _____

_____

_____ _____

Honolulu, Hawaii Councilmembers

Exhibit A

DEPARTMENT OF TRANSPORTATION SERVICES

SAFETY AND SECURITY OFFICE

AGENCY SAFETY PLAN

DOCUMENT ISSUE TABLE		
POSITION	**SIGNATURE**	**DATE**
Verifier (Manager Safety Systems)	Figueroa, Oscar Digitally signed by Figueroa, Oscar Date: 2025.10.03 15:15:19 -10'00'	
Achknowledge (Interim CSSO) Consultant - Jacobs	Jose A. Marquez	
Authorizer (Director, Department of Transportation Services, Accountable Executive)		

CHANGE HISTORY				
REVISION	**DATE**	**SECTION(S)**	**DESCRIPTION**	**REVIEWER**
00.00	05/19/2020	All	Initial Release	Director, Director of Rapid Transit, Chief Safety and Security Officer
01.00	12/30/2022	All	Updates to comply with revised HDOT Program Standard, Rev 6, and BIL Revisions to 49 USC 5329(d)	Director, Director of Rapid Transit, Chief Safety and Security Officer
02.00	04/26/2024	All	Updates to comply with revised HDOT Program Standard, Rev 8, and RBI Program	Director, Director of Rapid Transit, Interim Chief Safety and Security Officer

CHANGE HISTORY

REVISION	DATE	SECTION(S)	DESCRIPTION	REVIEWER
03.00	07/22/2025	All	(1) Updates to comply with changes to 49 CFR Part 674 and revised FTA National Public Transportation Safety Plan. (2) Revisions to various sections to reflect current regulatory and operating conditions. (3) Document renamed to Agency Safety Plan (ASP).	Director, Interim Chief Safety and Security Officer, Manager Safety Systems

City and County of Honolulu
Department of Transportation Services

Safety Committee Approval of Skyline Agency Safety Plan

The Skyline Safety Steering Committee (SSSC) has reviewed the DTS Agency Safety Plan (ASP), Revision 03.00 dated July 22, 2025, for the Skyline rail transit system, in accordance with the requirements set forth in 49 CFR Part 673.

We affirm that the DTS ASP, Revision 03.00:

- Aligns with the principles and methods of Safety Management Systems (SMS) as required by §673.3
- Includes safety performance targets, risk mitigation strategies, and safety assurance measures consistent with §673.11 and §673.23–§673.27
- Was developed in cooperation with Skyline frontline transit worker representatives, as outlined in §673.17
- Has been reviewed and endorsed by the Accountable Executive of DTS, as defined in §673.5

Therefore, the SSSC hereby formally approves the DTS ASP, Revision 03.00, for implementation effective August 27, 2025, at 11:37 AM Hawaiian Time, and authorizes its submission to the Hawaii Department of Transportation State Safety Oversight Office as evidence of compliance with 49 CFR Part 673 and HDOT SSOA Program Standards & Procedures.

By signing below, I hereby certify:

Jose A. Marquez

Jose A. Marquez
Interim DTS Chief Safety & Security Officer

Sept 11, 2025
Date

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POLICY STATEMENT

The City and County of Honolulu (CCH) has identified the Department of Transportation Services (DTS) as the department responsible for overseeing the operations and maintenance of Skyline and is committed to providing safe, reliable, and resilient service. This Agency Safety Plan (ASP) serves as a guiding document describing the various safety-related roles and responsibilities, system safety activities, the processes for identifying and managing potential system hazards, and a means for managing system safety for Skyline. Paramount to these activities is the establishment of a Safety Management System (SMS) program, which serves as the guiding principle for all activities conducted by DTS and its contractors. Specifically, DTS and its contractors shall:

- Develop a positive safety culture through the implementation of a comprehensive SMS program;
- Manage the risks associated with the operation and maintenance of the system to prevent Safety Events;
- Provide safety information and training to ensure employees and contractors understand their role in system safety;
- Ensure facilities and equipment are safe for passenger service;
- Establish relationships with external stakeholders including emergency responders; and
- Strive for continuous improvement in the management of safety.

The DTS Director is the Accountable Executive and he has empowered the Chief Safety and Security Officer (CSSO) to develop, distribute, and administer a comprehensive, integrated, and coordinated ASP. The Lead Operations and Maintenance Contractors (LOMCs) are responsible for implementing the safety programs discussed in this Plan, including establishing a hazard management program, providing SMS training, and promoting system safety. All employees shall take an active role in identifying and reporting hazardous conditions and becoming qualified to respond to emergency and degraded operations that apply to their assignments. The DTS CSSO in coordination with LOMC managers and supervisors must guide the process of identifying, assessing and resolving hazards and threats and are expected to cooperate fully with the DTS CSSO in this endeavor.

CCH requires all DTS employees and its contractors to adhere to the ASP and its policies, safety performance targets, and related plans, procedures, and work instructions.

As required by 49 CFR Part 673, this Plan, which encapsulates DTS' commitment to continuously monitor, measure, and improve safety performance, has been approved by the City Council of Honolulu and endorsed by the DTS Director who also acts as the Accountable Executive.

_____ _____

J. Roger Morton, Director and Accountable Executive Date

1 Introduction

1.1 Purpose

The purpose of this Agency Safety Plan (ASP) is to set forth the requirements for identifying, evaluating and minimizing safety risk and to describe the responsibilities and activities associated with the implementation of a comprehensive Safety Management System (SMS) program to ensure the safe and secure operation of Skyline. The ASP is developed in accordance with the Federal Transit Administration's (FTA) requirements (49 CFR Parts 670, 671, 672, 673, and 674) and the Hawaii Department of Transportation (HDOT) Rail Transit Safety Oversight Program Standards & Procedures (PSP), Revision 9 dated January 28, 2025. The ASP incorporates the four components of SMS:

- Safety Management Policy (49 CFR 673.23);
- Safety Risk Management (49 CFR 673.25);
- Safety Assurance (49 CFR 673.27); and
- Safety Promotion (49 CFR 673.29).

The ASP is specifically developed to:

- Establish the SMS Program for Skyline;
    - Establish a written statement of safety policy, which includes the agency safety objectives, confidential anonymous employee safety reporting program, and organizational accountability and safety responsibilities for the Accountable Executive, Chief Safety Officer, agency leadership, and key staff responsible for safety and performing verification on all safety tasks.
    - Establish a process to identify safety hazards and consequences, assessing the safety consequences associated with the identified safety hazards, prioritizing safety hazards based on the level of risk, and implementing safety risk mitigations.
    - Establish and implement a process for safety performance monitoring and measurement, management of change, and continuous improvement.
    - Establish and implement a comprehensive safety training program, which includes SMS for all employees and contractors directly responsible for safety and their methodology for communicating an agency's safety performance throughout the organization.
- Identify the relationships and responsibilities of the CCH Department of Transportation Services (DTS) with other agencies and organizations, which impact transit system safety;

- Provide formal documentation of DTS commitment to safety;
- Provide a framework for implementing the DTS Safety Management Policy;
- Achieve DTS' system safety goals and objectives in compliance with the FTA's National Public Transportation Safety Plan; and
- Satisfy federal, state, and local laws, codes, ordinances, and regulations.

1.2 Scope

This ASP describes the responsibilities and activities, which must be implemented and maintained to achieve the highest degree of safety in the operation of Skyline. The ASP identifies safety activities intended to improve the coordination, cooperation, and communication of safety related functions within and across organizations. This document is focused towards maximizing the safety of Skyline customers, employees, contractors and all who are affected by the service. The ASP identifies the safety organization and activities carried out to implement a comprehensive SMS. These activities are implemented throughout the entire life cycle of equipment and buildings from conception through retirement.

1.3 Reference Documents

1.3.1 Contractual Reference Documents

Document Code	Document Title
CT-HRT-1200106	Lead Operations and Maintenance Contractor – Core Systems Contractor (LOMC-CSC) Contract
CT-DTS-2200076	Lead Operations and Maintenance Contractor – Level 2 Security Services (LOMC-L2S) Contract
CT-HRT-1300318	Lead Operations and Maintenance Contractor – Vertical Transportation Services (LOMC-VTS) Contract
CT-DTS-2200158	Lead Operations and Maintenance Contractor – Backup Generator Maintenance/Inspection Services (LOMC-GEN) Contract

Document Code	Document Title
MA-HRT-1600103	Lead Operations and Maintenance Contractor – Revenue Systems Integration Services (LOMC-RIS) Contract
CT-DTS-2000331	Lead Operations and Maintenance Contractor – Revenue System Services (LOMC-RSS) Contract
SC-DTS-2100094	Lead Operations and Maintenance Contractor – Bridge Inspection Services (LOMC-BIS) Contract
MA-DTS-2200114	Lead Operations and Maintenance Contractor – Pest Control Services (LOMC-PCS) Contract

1.3.2 Project Reference Documents

Document Code	Document Title
HDOT PSP	HDOT Rail Transit Safety Oversight Program Standards & Procedures, Revision 8 dated January 30, 2024
49 U.S.C. 5329(d)	FTA Bipartisan Infrastructure Law changes to 49 U.S.C. 5329(d)
49 U.S.C. 5329(e)	FTA Changes to 49 CFR Part 674
SSO-00001	Safety Committee Charter
SSO-00002	Internal Audit Program Plan

1.4 Acronyms and Abbreviations

ASP Agency Safety Plan

ATC Automatic Train Control

CAP Corrective Action Plan

CCC Change Control Committee

CCH	City and County of Honolulu
CDC	Centers for Disease Control and Prevention
CFR	Code of Federal Regulations
CSC	Core Systems Contractor
CSSO	Chief Safety and Security Officer
DTS	Department of Transportation Services
EMP	Emergency Management Plan
ESSC	Emergency & Security Systems Committee
FTA	Federal Transit Administration
HART	Honolulu Authority for Rapid Transportation
HFD	Honolulu Fire Department
HPD	Honolulu Police Department
HRTP	Honolulu Rail Transit Project
HTL	Hazard Tracking Log
IAPP	Internal Audit Program Plan
LOMC	Lead Operations and Maintenance Contractor
LOMC-BIS	Lead Operations and Maintenance Contractor – Bridge Inspection Services
LOMC-CSC	Lead Operations and Maintenance Contractor – Core Systems Contractor
LOMC-GEN	Lead Operations and Maintenance Contractor – Backup Generator Maintenance/Inspection Services
LOMC-L2S	Lead Operations and Maintenance Contractor – Level 2 Security Services
LOMC-PCS	Lead Operations and Maintenance Contractor – Pest Control Services
LOMC-RIS	Lead Operations and Maintenance Contractor – Revenue Systems Integration Services
LOMC-RSS	Lead Operations and Maintenance Contractor – Revenue System Services
LOMC-VTS	Lead Operations and Maintenance Contractor – Vertical Transportation Services
MESS	Manager of Emergency & Security Systems
MMIS	Maintenance Management Information System

MOCC	Management of Change Committee
MOU	Memorandum of Understanding
MOW	Maintenance of Way
MSS	Manager of Safety Systems
NTD	National Transit Database
NTSB	National Transportation Safety Board
OCC	Operations Control Center
OHA	Operational Hazard Analysis
PHA	Preliminary Hazard Analysis
PPE	Personal Protective Equipment
PSP	Program Standards and Procedures
PTSCTP	Public Transportation Safety Certification Training Program
RBI	Risk-Based Inspection
ROC	Rail Operations Center
RTA	Rail Transit Authority
RWP	Roadway Worker Protection
S&S	Safety and Security
SCADA	Supervisory Control and Data Acquisition
SMS	Safety Management System
SSEIC	System Safety & Event Investigation Committee
SSO	Safety and Security Office
SSOA	State Safety Oversight Agency
SSP	System Security Plan
SSSC	Skyline Safety Steering Committee
TAMS	Transit Asset Management System
TVA	Threat and Vulnerability Assessment
VRM	Vehicle Revenue Miles

1.5 Terms and Definitions

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

Assault on a transit worker means a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker.

CFR means Code of Federal Regulations.

Chief Safety and Security Officer (CSSO) means an adequately trained individual who has responsibility for safety and Security and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer (i.e., Accountable Executive). A Chief Safety and Security Officer may not serve in other operational or maintenance capacities.

Close Call – see Near Miss.

Collision means any impact between a rail transit vehicle and any other vehicle, object, or any person.

Contractor means an entity that performs tasks required on behalf of the oversight or rail transit agency. The rail transit agency may not be a contractor for the oversight agency.

Corrective Action Plan (CAP) means a plan developed by the rail transit agency and/or its contractors that describes the actions the rail transit agency will take to address an identified deficiency or safety concern, and the schedule for implementing those actions. These plans also refer to actions taken to address deficiencies identified through internal and external audit findings or to prevent

reoccurrence of the causal factors identified from event investigations. The SSOA or the FTA may require DTS to develop and carry out a corrective action plan.

Derailment means a safety event in which one or more wheels of a rail transit vehicle unintentionally leaves the rails (in the yard or mainline).

Designated Personnel means: (1) Employees and contractors identified by a recipient whose job functions are directly responsible for safety oversight of the public transportation system of the public transportation agency; or (2) Employees and contractors of a State Safety Oversight Agency whose job function requires them to conduct reviews, inspections, examinations, and other safety oversight activities of the rail fixed guideway public transportation systems subject to the jurisdiction of the agency.

Directive means a written communication from SSOA to a rail fixed guideway public transportation system that requires the rail fixed guideway public transportation system to take one or more specific actions to ensure the safety of the general public and/or employees on and around the transit system.

Disabling damage means damage to a rail transit vehicle resulting from a collision and preventing the vehicle from operating under its own power.

DTS means the CCH Department of Transportation Services.

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

Evacuation for life safety reasons means a condition that occurs when persons depart from transit vehicles or facilities for life safety reasons, including self-evacuation. A life safety reason may include a situation such as a fire, the presence of smoke or noxious fumes, a fuel leak from any source, an electrical hazard, or other hazard to any person. An evacuation of passengers into the rail right of way (not at a platform or station) for any reason is presumed to be an evacuation for life safety reasons.

Safety Event/Hazard Investigation Plan means a plan or set of procedures for conducting investigations at a rail transit property. DTS must develop and

implement an SSOA-approved plan.

Fatality means a death confirmed within 30 days of a safety event. Fatalities include suicides, but do not include deaths in or on transit property that are a result of drug overdose, exposure to the elements, illness, or natural causes.

FTA means the Federal Transit Administration, an operating administration within the U.S. Department of Transportation.

HART means Honolulu Authority for Rapid Transportation.

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

HDOT means the Hawaii Department of Transportation.

HMP means Hazard Management Plan.

HRTP means the Honolulu Rail Transit Project.

IAPP means Internal Audit Program Plan.

Individual means a passenger; employee; contractor; rail transit facility worker; pedestrian; trespasser; or any person on rail transit-controlled property.

Initial Submission means any standard, plan, procedure, or other SSOA-related document to be submitted by DTS to the SSOA for review and approval that has not been previously reviewed and approved in accordance with the requirements of the HDOT PSP or federal regulation regarding the Safety of a rail fixed guideway public transportation system.

Injury means any harm to persons as a result of a safety event that requires immediate medical attention away from the scene. Does not include harm resulting from a drug overdose, exposure to the elements, illness, natural causes, or occupational safety events occurring in administrative buildings.

Inspection means a physical observation of equipment, facilities, rolling stock, operations, personnel, or records for the purpose of gathering or analyzing facts

or information.

Investigation means the process of determining the causal and contributing factors of a safety event or hazard, for the purpose of preventing recurrence and mitigating safety risk.

Lead Operations and Maintenance Contractor means any Contractor that the CCH has or will enter into any contract to lead in performance of any material part of the Skyline O&M work.

Major Capital Project means a project that involves the construction of a new fixed guideway or an extension to an existing guideway; involves the rehabilitation of an existing fixed guideway with a total project cost in excess of $100 million; or is determined by the FTA to be a major capital project.

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

Near Miss means an unplanned event that has the potential to cause, but does not actually result, in human injury, environmental or equipment damage, or an interruption to normal operation.

New Start Project means any rail fixed guideway system funded under the FTA's 49 U.S.C. 5309 discretionary construction program.

NTD means the National Transit Database.

NTSB means the National Transportation Safety Board.

Operational Hazard Analysis (OHA) means a transit agency analysis which identifies and analyzes hazards associated with personnel and procedures during production, installation, testing, training, operations, maintenance, and emergencies. The OHA is conducted on all tasks and human actions, including acts of omission and commission, by persons interacting with the system, subsystems, and assemblies, at any level.

Other Events means any safety or security event which does not meet 49 CFR 674.33 definition of a Safety Event.

Oversight Agency means the entity, other than the rail transit agency, designated by the state or several states to implement 49 CFR Part 674.

Passenger means a person who is on board, boarding, or alighting from a rail transit vehicle for the purpose of travel.

Person means a passenger, employee, contractor, volunteer, official worker, pedestrian, trespasser, or any other individual on the property of a rail fixed guideway public transportation system or associated infrastructure.

Plan means a document developed and adopted by the rail transit agency describing its policies, objectives, responsibilities, and procedures for a given program, policy, or strategy.

Potential consequence means the effect of a hazard.

Preliminary Hazard Analysis (PHA) means a transit agency analysis typically drafted prior to and updated during the engineering phase of a capital project, enabling development of design criteria that assure safety and security are built into the project prior to construction.

Pre-Revenue Service Review (PRSR) means the review conducted by the SSOA of a rail transit agency new start, system extension, or other major capital project to verify that the safety and security certification process was implemented according to the RTA's plans; that all necessary procedures are in place; and that hazards are mitigated to an acceptable risk level.

Procedure means a set of fixed, written instructions or steps developed and adopted by the rail transit agency for carrying out a given plan or operation in a given situation.

Program Standards and Procedures (PSP) means a written document developed and adopted by the oversight agency that describes the policies, objectives, responsibilities, and procedures used to provide rail transit agency safety and security oversight.

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

5329 and 49 CFR Part 673.

Public Transportation Safety Certification Training Program (PTSCTP) means the certification training program that is required by 49 U.S.C. 5329(c) and 49 CFR Part 672.

Rail Fixed Guideway Public Transportation System means any fixed guideway system, or any such system in engineering or construction, that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the FRA. These include but are not limited to rapid rail, heavy rail, light rail, monorail, trolley, incline plane, funicular, and automated guideway.

Rail Transit Agency (RTA) means any entity that provides service on a rail fixed guideway public transportation system. DTS is responsible for the operations and maintenance of Skyline during revenue service and serves as the RTA. Certain responsibilities assigned to the RTA as described in the HDOT PSP will be assumed by HART, the agency responsible for delivering Skyline and for certifying the system as safe and secure to initiate passenger service. The division of responsibility between HART and DTS over program requirements assigned to the RTA is identified in the HART-DTS Memorandum of Understanding (Appendix O of the HDOT PSP) and in other program documentation maintained by HART and DTS.

Rail Transit-Controlled Property means property that is used by the rail transit agency and may be owned, leased, or maintained by the rail transit agency.

Rail Transit Vehicle means any rolling stock used on a rail fixed guideway public transportation system, including but not limited to passenger and maintenance vehicles.

Revenue Service means the period of time when any aspect of the rail transit agency operations is initiated with the intent to carry passengers.

Revenue Vehicle means a rail transit vehicle used to provide revenue service for passengers. This includes providing fare free service.

Risk-Based Inspection Program means an inspection program that uses qualitative and quantitative data analysis to inform ongoing inspection activities. Risk-based inspection programs are designed to prioritize inspections to address safety concerns and hazards

associated with the highest levels of safety risk.

Safety means freedom from harm resulting from unintentional acts or circumstances.

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

Safety Event means an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

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

SMS Executive means a Chief Safety & Security Officer or an equivalent.

Safety Performance Improvement means the cyclical relationship in which safety risk management identifies, assesses, and mitigates hazards, their safety risks, and potential consequences, and monitors mitigations for effectiveness through a documented Safety Performance Monitoring and Measurements program.

Safety Performance Target means a Performance Target related to safety management activities.

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

Safety Risk means the composite of predicated severity and likelihood of a potential consequence of a hazard.

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

Safety Risk Management means a process for identifying real or potential hazards

and analyzing, assessing, and mitigating safety risk.

Safety Risk Mitigation means a method or methods to eliminate or reduce the severity and/or likelihood of a potential consequence of a hazard.

Safety and Security Certification means the process applied to project development to ensure that all practical steps have been taken to optimize the operational safety and security of the project during engineering, design, construction, and testing phases before the start of passenger operation.

Security means freedom from harm resulting from intentional acts or circumstances.

Skyline, formerly known as the Honolulu Rail Transit Project or HRTP, is the name of the rail system operated by DTS.

System Security Plan (SSP) means a document developed and adopted by the rail transit agency describing the application of operating, technical, and management techniques and principles to the security aspects of the system throughout its life to reduce threats and vulnerabilities and describing the emergency preparedness policies and procedures for mobilizing the system and other public safety resources to assure rapid, controlled, and predictable responses to various types of transportation and community emergencies.

Sensitive Security Information (SSI), as defined in 49 CFR Section 1520.5, means information obtained or developed in the conduct of security activities, including research and development, the disclosure of which would (1) constitute an unwarranted invasion of privacy (including information contained in any personnel, medical, or similar file); (2) reveal trade secrets or privileged or confidential information obtained from any person; or (3) be detrimental to the security of transportation.

SSCP means Safety and Security Certification Plan.

SSCVR means Safety and Security Certification Verification Report.

State means a state of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands. Within this document, State may also be used specifically to indicate the State of Hawaii.

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

Substantial Damage means any physical damage to transit or non-transit property including vehicles, facilities, equipment, rolling stock, or infrastructure. Substantial Damage INCLUDES damage which adversely affects the structural strength, performance, or operating characteristics of the vehicle, facility, equipment, rolling stock, or infrastructure requiring towing, rescue, onsite maintenance, or immediate removal prior to safe operation. Substantial Damage EXCLUDES damage such as cracked windows, dented, bent, or small punctured holes in the body, broken lights, mirrors, or removal from service for minor repair or maintenance, testing, or video and event recorder download.

Threat means any real or potential condition that can cause injury or death to passengers or employees, or damage to or loss of transit equipment, property, and/or facilities.

Threat and Vulnerability Assessment (TVA) means the process by which a rail transit agency systematically evaluates the security vulnerabilities and hazards of its system, including a method for prioritizing hazards and gauging likelihood and severity.

U.S.C. means United States Code.

Unintended Train Movement means any instance where a revenue vehicle is moving and is not under the control of a driver (whether or not the operator is physically on the vehicle at the time). This applies regardless of whether the event occurred in revenue service.

Vulnerability means a characteristic of passengers, employees, vehicles, and/or facilities that increases the probability of a security breach.

1.6 Description of Changes from the Previous Revision

The FTA has revised and republished 49 CFR 674 under the authority of Section 49 USC 5329 dated October 24, 2024, and effective January 1, 2025. As part of this update, the DTS ASP, Rev 03.00, has been revised to incorporate these changes.

Several sections have been added or updated to ensure compliance with the latest HDOT PSP, Revision 9 dated January 28, 2025, the FTA/HDOT Risk-Based Inspection (RBI) Program, changes to 49 CFR Part 674, the revised FTA National Public Transportation Safety Plan, and new 49 CFR Part 671 requirements. Revised sections include, but are not limited to, Terms and Definitions; RBI Program Requirements; Safety Committees; Safety Performance Targets; Risk Reduction Performance Targets; Event Notification, Investigation, and Reporting; ASP Implementation Training Requirements; ASP Control and Update Procedures; Internal Safety and Security Audit Program; and Management Structure and Organization.

The Emergency Management Program, Drug and Alcohol, and Hazardous Materials Program sections have been relocated to be under Component 4 - Safety Promotion. The Safety Plan Documentation section has been relocated to be under Component 3 – Safety Assurance. The HDOT Risk-Based Inspection Program Requirements subsection has been relocated to be under Section 7.1 Safety Data Acquisition, Collection and Analysis.

The title of the document has been changed from the Agency Rail Safety Plan to Agency Safety Plan.

2 Authority

The responsibilities for the planning, design, development, construction, operations and maintenance are divided between two entities of CCH: DTS and the Honolulu Authority for Rapid Transportation (HART).

1. **Legal** – Under Article XVII of the Revised Charter for the CCH, HART is responsible for the planning, design, development, and construction of Skyline. In 2016, the voters approved Charter Amendment 4 (certified November 29, 2016) which placed responsibility for the operations and maintenance of Skyline solely with DTS.

2. **Authority** - The State of Hawaii Department of Transportation (HDOT) is designated as the State of Hawaii State Safety Oversight Agency (SSOA) pursuant to 49 United States Code (U.S.C.) Section 5329(e)(4) and any reauthorization of or amendment to those sections concerning its oversight of the safety of rail fixed guideway public transportation in the State of Hawaii. The requirements to establish the ASP are contained within the HDOT PSP. The SSOA policy will foremost be achieved through implementation of a 49 Code of Federal Regulations (CFR) Part 674 compliant program with additional requirements unique to the complexity and nature of automated fixed guideway public transportation systems.

3. Per the requirements contained in 49 CFR 673.23, the CCH is required to establish its organizational accountabilities and responsibilities and have a written statement of Safety Management Policy, which includes the department's safety objectives and key executive staff:

   - City Council
   - DTS Director (Accountable Executive)
   - DTS Deputy Director
   - Chief Safety and Security Officer (CSSO)

The approved organizational structure is found in Figure 1. The CSSO has a direct line of reporting to the DTS Director (Accountable Executive).

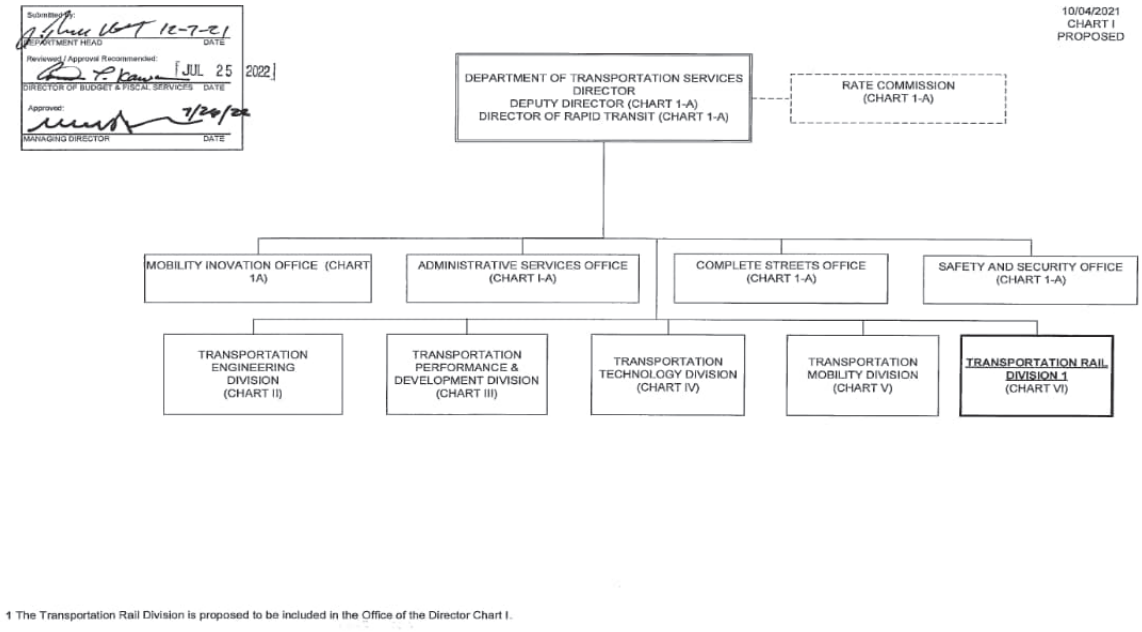
The DTS structure demonstrates the Safety Accountable Executive is present to carry out the ASP, including SMS, the Transit Asset Management Plan, and the Transit Asset Management System (TAMS). SMS is a comprehensive, collaborative approach to managing safety. SMS brings management and staff together to better control risk, identify and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more precisely. The TAMS is a strategic and systematic process of operating, maintaining, and improving public transportation capital assets effectively throughout the life cycle of such assets.

4. On April 12, 2019, a Memorandum of Understanding (MOU) was signed between DTS and HART to establish the responsibilities for Skyline safety and security. This MOU forms the basis of this Plan and the division of responsibilities described in this ASP.

For the purposes of this document, the terms “oversee” and “oversight” are defined as the direct observation, monitoring, inspection and/or auditing of activities and tasks performed by an LOMC, subject to the terms of the relevant contract. An LOMC is defined as any Contractor the CCH has or will enter into any contractual relationship to lead in the performance of any material part of the O&M work.

For ease of reference, the CCH’s and DTS’s rights and role under this plan are intended to be constructed to conform to the contractual requirements and limitations in any current or future contract between the CCH and an LOMC.

Figure 1. DTS Organizational Chart



1 The Transportation Rail Division is proposed to be included in the Office of the Director Chart I.

3 Safety Management System

On July 6, 2012, President Obama signed into law P.L. 112-141, the Moving Ahead for Progress in the 21st Century Act (MAP-21). MAP-21 created a streamlined, performance-based, and multimodal program to address the many challenges facing the U.S. transportation system including improving safety and maintaining infrastructure conditions. Under MAP-21, the Federal Transit Administration (FTA) required changes to the current regulations for State Safety Oversight including the updates to system safety program plans to incorporate an SMS approach. The SMS approach requires a formal, top-down, organization-wide approach to managing safety risk and ensures the effectiveness of a transit agency's safety risk mitigation, as defined under 49 CFR 673.5. SMS includes systematic procedures, practices, and policies for managing risks and hazards, including developing:

- An accountable safety organization
- Strong safety culture
- Proactive hazard analysis
- Performance measures and leading indicators
- Formal data collection
- Voluntary reporting
- Continuous learning and communications

Figure 2. SMS Principles

SMS is a management approach, which ensures each public transportation agency, regardless of its size or service environment, has the necessary organizational structures, accountabilities, policies, and procedures in place to direct and control resources for safety management. SMS builds on the public transportation industry's existing safety foundation to mitigate safety risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more accurately. DTS has adopted and is committed to implementing SMS principles.

The ASP is compliant with FTA regulations (49 CFR Parts 670, 671, 672, 673, and 674) and the HDOT PSP. DTS and its contractors are committed to implementing an SMS program. Pursuant to 49 CFR 673.21, the ASP is organized according to the four components of SMS, mainly:

- **Safety Management Policy (49 CFR 673.23)** – DTS' documented commitment to safety, which defines the safety objectives and the accountabilities and responsibilities of employees regarding safety.
- **Safety Risk Management (49 CFR 673.25)** – The processes for identifying hazards and analyzing, assessing, and mitigating safety risk, which is tracked until closure.
- **Safety Assurance (49 CFR 673.27)** – The processes, which function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure DTS and its contractors meet or exceed its safety objectives through the collection, analysis, and assessment of information.
- **Safety Promotion (49 CFR 673.29)** – The combination of training and communication of safety information to support SMS as applied to Skyline.

4 System Description

When completed, Skyline will be an 18.75-mile elevated rail line on a dedicated right of way with 19 stations. The Project is scheduled to open in 3 consecutive segments: West Project Segment begins at East Kapolei and terminates at Aloha Stadium, and includes the first nine stations; the Airport Project Segment, extends Skyline to Middle Street and adds 4 stations; the City Center Project Segment extends the system to Civic Center and adds 6 stations. When all three sections are completed, the system will connect West Oahu with downtown Honolulu and Civic Center via Honolulu International Airport.

The ASP is currently only applicable to the West Project Segment: East Kapolei to Aloha Stadium. DTS will update the system description of the ASP prior to the start of Revenue Service operations of each subsequent segment.

4.1 Scope of Transit Services

The Passenger Service Date for the full-scope of the Project, as described in this document, is anticipated to be March 31, 2031. There will be two earlier passenger service dates, prior to full operations. The first Operating Segment opened on 6/30/2023 from East Kapolei to Aloha Stadium. The current hours of operation are from 5:00 a.m. to 7:00 p.m. on weekdays and 8:00 a.m. to 7:00 p.m. on weekends and holidays. The service operates every 10 minutes.

The second Operating Segment is expected to open in late 2025 from Aloha Stadium to the Middle Street Transit Center. Hours of operation for the second Operating Segment will be from 5:00 a.m. to 11:00 p.m. on weekdays and 5:00 a.m. to 12:00 a.m. on weekends and holidays. The base hours will be from 5:00 a.m. to 9:00 p.m. on weekdays and 5:00 a.m. to 10:00 p.m. on weekends. The late hours will be from 9:00 p.m. to 11:00 p.m. on weekdays and 10:00 p.m. to 12:00 a.m. on weekends. The service will operate every 10 minutes during the base period, and every 15 minutes during the late period.

The third Operating Segment/full Operations and Maintenance period is expected to open in 2031 from Middle Street to the Civic Center. Hours of operation will be from 4:00 a.m. until midnight on weekdays. The base hours will be from 4:00 a.m. to 5:00 a.m., 9:00 a.m. to 3:00 p.m., and 7:00 p.m. to 9:00 p.m. on weekdays and 4:00 a.m. to 9:00 p.m. on weekends. The peak hours will be from 5:00 a.m. to 9:00 a.m. and 3:00 p.m. to 7:00 p.m. on weekdays. The late hours will be from 9:00 p.m. to 12:00 a.m. on weekdays and weekends. The service will operate every 10 minutes during the weekday base period, every six (6) minutes during the peak periods, and every 15 minutes during the late period. On weekends and holidays, the service will also run from 4:00 a.m. until midnight.

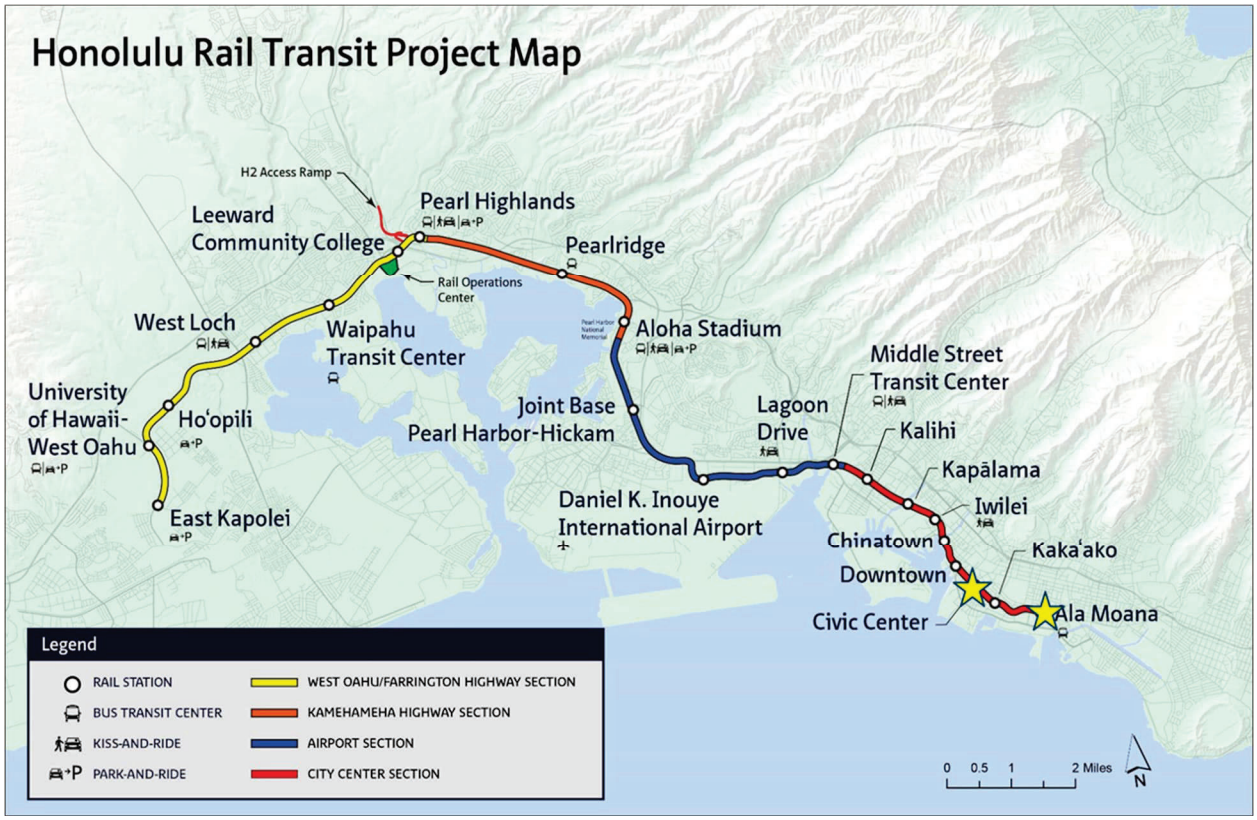
However, the service will operate every 10 minutes during the weekend base period and every 15 minutes during the late period.

4.2 Physical Plant

4.2.1 Structure

The Skyline alignment operates on a dedicated right-of-way, fully grade-separated from roadway operation, with grade-level facilities at the operations yard, which are fully fenced. When completed, the entire operating system will consist of 18.75 miles of double track, starting at East Kapolei and going to Civic Center, with an electrified third rail.

Figure 3.1 Route Map



There are twelve (12) crossovers at various locations along the entire guideway with a pocket track at the Aloha Stadium station to permit turn-backs, single tracking, or storage. Crossovers are spaced so continuous service can be maintained in each direction between most crossovers using only one track. Trains can be operated on either track under fully automatic train control. When complete, the entire system will include 13 traction power substations and 2 gap breaker stations.

4.2.2 Stations

There are nineteen (19) stations in the entire system, with nine stations in the West Project Segment and four (4) additional stations in the Airport Project Segment, and six (6) additional stations in the City Center Project Segment. All stations were scaled to accommodate a 4-car consist with a total length of two-hundred and fifty-six (256) feet and include platform screen gates for safety and security. Passenger stations are constructed of simple three-level modular structures: a ground entrance with ticket vending equipment, Automated External Defibrillators (AEDs) at each entrance (UH West Oahu Station, due to distance, has a second AED at platform

level), entrance/fare gates, electric power equipment rooms and a train platform level for boarding. All stations have elevators and all (with the exception of Ho'opili, Waipahu, and Leeward Community College) have escalators.

Stations are staffed with Station Operators who provide assistance in system usage, fare policy and usage and directional information to customer as well as emergency service support. In addition, they monitor station facilities for station maintenance and customer safety. Station Operators shall provide access to station bathrooms at the request of customers.

Skyline has closed-circuit television (CCTV), emergency and information call points at stations and on-board trains as well as security staffing. System security for Skyline is implemented through a three-level security approach.

Controllers are positioned at the Operations Control Center (OCC). Station Operators are positioned at each station. Train Operators are positioned on every other train. These positions are responsible for providing Level 1 Security throughout the system. Responsibilities include activities such as the prevention of access to non-public areas, prevention of damage to security support systems (CCTV), customer assistance, and crowd control. The OCC is the primary interface with emergency responders.

LOMC-L2S Customer Safety Officers are positioned at the Security Command Console (SCC) in the OCC to monitor CCTV, roving patrols of stations, parking facilities, and onboard trains. The staff also provide support for Level 1 Security.

The Honolulu Police Department is responsible for Level 3 Security on an as needed basis. The responsibilities include addressing suspected or actual criminal activity.

Three park-and-ride lots are located at the UH-West Oahu, Hoʻopili and Aloha Stadium stations.

Table 1 lists the names and locations of the rail stations and its planned station features, by operating segment.

Table 1. Honolulu Rail Transit Stations and Station Features

STATION	PLANNED STATION FEATURES
West Project Segment (WPS)	
Kualakaʻi (East Kapolei)	-
Keoneʻae (University of Hawaii West Oʻahu)	Park-and-Ride Lot
Honouliuli (Hoʻopili)	Park-and-Ride lot

STATION	PLANNED STATION FEATURES
Hōʻaeʻae (West Loch)	Park-And-Ride Lot
Pouhala (Waipahu)	Major Bus Interface With Bus Transit Center
Hālaulani (Leeward Community College)	Community College Interface
Waiawa (Pearl Highlands)	-
Kalauao (Pearlridge)	-
Hālawa (Aloha Stadium)	Park-And-Ride Lot Major Bus Interface
Airport Project Segment (APS)	
Makalapa (Pearl Harbor Naval Base)	-
Lelepaua (Honolulu International Airport)	Pedestrian Walkways To Airport Terminal
Āhua (Lagoon Drive)	-
Kahauiki (Hauiki) (Middle Street)	Major Bus Interface With Bus Transit Center Pedestrian Bridge To Transit Center
City Center Project Segment (CCPS)	
Mokauea (Kalihi)	-
Niuhelewai (Kapālama)	-
Kūwili (Iwilei)	Entry Building Off Transit Plaza
Holau (Hōlau – Hoʻolau) (Chinatown)	Entry Building Off Pedestrian Plaza
Kuloloia (Downtown)	Entry Off Pedestrian Urban Courtyard
Kaʻākaukukui (Civic Center)	Passenger Plaza Adjacent To Entry Building

4.2.3 Passenger Vehicles

The basic trainset is configured as a consist of four passenger vehicles permanently coupled, classified as type E1, E2, M1, M2.

The train configuration is:

- E1-M1-M2-E2
- or End car 1, Middle car 1, Middle car 2 and End car 2

Figure 3.2 4-Car consist

E1-car and E2-car have the same carbody shell. There are few differences in the equipment mounted on each E-car. M1-car and M2-car will also be designed to have the same carbody shell and few differences in the equipment provided for each car.

Table 2. 4-Car Vehicle Parameters

Design Capacity (AW2): 4 pass/m^2	415787 [lb] (188,598 [Kg])
Vehicle length [ft.]	256.56
Tare Weight [lb]	288,072
Wheel diameter (new / worn out) [in]	[28.0 / 26.0]
Bogies	2 Motor Bogies (per car)
N° Shoe collectors per bogie	2 (1 per side)
Maximum Speed [mph]:	55

Each passenger vehicle is equipped with AEDs.

4.2.4 Rail Operations Center (ROC)

The Rail Operations Center (ROC) is located between the Waipahu and Leeward Community College stations, and includes facilities to repair, maintain, clean, and store revenue-service

vehicles and maintenance of way (MOW) equipment and to support the maintenance of the system. The ROC contains four buildings:

- Operations and Service Building (OSB), where revenue vehicles are repaired as well as housing the OCC, the Security Command Console and offices for the various departments;
- Train Wash Facility (TWF), where revenue vehicles are cleaned;
- MOW building, which includes storage for MOW vehicles along with office space; and
- Wheel Truing Facility (WTF), which includes the machine to true wheels, which gives the wheels the proper shape for maintenance and to eliminate flat spots.

Figure 3.3 Rail Operations Center (Maintenance and Storage Facility)

4.3 Operations and Maintenance

Technical details and specifications are provided in the HNL-09006 System Operations Plan and the Maintenance Management Plan.

5 COMPONENT 1 – SAFETY MANAGEMENT POLICY

The safety management policy is the written foundation of the DTS SMS. It formally and explicitly commits DTS and its LOMCs to the development and implementation of the organizational structures and resources necessary to sustain the safety management processes and activities.

Per Section 3.1.6 of the HDOT PSP and 49 CFR 673.23, DTS established organizational accountabilities and responsibilities and has a written statement of safety management policy that includes the agency's safety objectives. In addition, DTS established and implemented a confidential and anonymous employee reporting program that allows employees and contractors to report safety conditions to senior management without fear of retaliation and a description of employee behaviors that may result in disciplinary action. The safety management policy is communicated throughout the DTS, LOMC-Core Systems Contractor (CSC), and other LOMC organizations through the training programs.

5.1 Policy Statement

With respect to the organizational accountabilities, responsibilities, and the agency's safety objectives, please refer to DTS' Safety Management Policy Statement at the beginning of this document.

5.2 ASP Policies

DTS adheres to the following 49 CFR Part 670, 671, 672, 673, and 674 requirements in implementing this ASP:

1. This ASP, and subsequent updates, are approved and signed by the DTS Director (Accountable Executive), CSSO, the Skyline Safety Steering Committee (SSSC), and the City Council of Honolulu.
2. This ASP documents the processes and activities related to SMS implementation.
3. This ASP includes safety performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.
4. This ASP addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.

5. DTS has established a process and timeline for conducting an annual review and update of the ASP and submitting annually a formal Letter of Certification signed by the Accountable Executive to certify its compliance with 49 CFR Part 673 to HDOT.
6. DTS includes or incorporates by reference in the ASP an emergency preparedness and response plan or procedures, which address, at a minimum, the assignment of employee and contractor responsibilities during an emergency; and coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response within the DTS service area.

DTS has established the following Skyline policies and procedures:

1. Organizational accountabilities and responsibilities.
2. Safety policies, procedures, and requirements that integrate safety into decision-making and operations.
3. Assignment of responsibilities related to safety policies, procedures, and requirements.
4. Methods to verify adherence to safety policies, procedures, and requirements.
5. Processes to investigate all events as warranted.
6. Methodologies to identify, analyze, and resolve all hazards in a timely manner.
7. Programs to meet or exceed safety requirements in specifications, facility construction, equipment installation, system testing, and operations and maintenance.
8. Meet or exceed safety requirements in vehicle operations and maintenance.
9. Methodologies to evaluate and verify operational readiness of new transportation systems.
10. Requirements to establish standards and procedures for safety training, and performance.
11. Requirements to establish and implement a process, which allows employees and contractors to report safety issues to senior management including protections for employees who report safety conditions to senior management, and a description of employee behaviors, which may result in disciplinary action.
12. The ASP and Contractor Safety Plans are communicated throughout DTS, LOMC-CSC, and other LOMC organizations through the training programs.

13. The necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following individuals within its organization, as they relate to the development and management of the transit agency's SMS:

    a. An Accountable Executive for ensuring the agency's SMS is effectively implemented, throughout the agency's public transportation system, and for ensuring an equal number of frontline transit worker representatives, selected by a labor organization representing the plurality of the frontline workforce, and management representatives makeup the SSSC, which reviews and approves the ASP annually.

    b. Chief Safety Officer or SMS Executive who has the authority and responsibility for day-to-day implementation and operation of an agency's SMS. The Chief Safety Officer or SMS Executive must hold a direct line of reporting to the Accountable Executive.

    c. Agency Leadership and Executive Management (other than the Accountable Executive, Chief Safety Officer, or SMS Executive) who have authorities or responsibilities for day-to-day implementation and operation the agency's SMS must be identified.

    d. Key Staff or Committees to support the Accountable Executive, Chief Safety Officer, or SMS Executive in developing, implementing, and overseeing the agency's SMS.

5.3 Goals and Objectives

The ASP goals are as follows:

- Provide a safe, reliable, and resilient service for the Honolulu community.
- Clearly identify the organizational responsibilities for the safe operation of Skyline.
- Identify, eliminate, minimize, and/or control safety hazards and risks throughout the system. Ensure compliance with safety, health and environmental laws, regulations and codes.
- Maintain a high level of employee and contractor competence for responding to emergency/disaster conditions.
- Establish requirements, lines of authority, levels of responsibility and accountability for the implementation of the DTS safety program within the organization.
- Provide an exceptional level of safety in transportation operations (i.e., verification of adequate personnel training, operating rules, and operating and maintenance procedures for continuing safe and secure revenue service operations).

- Achieve and maintain a superior level of safety in the agency's work environment.
- Comply with applicable requirements for regulatory agencies.
- Maximize the safety of future operations through the design and procurement process.
- Meet the FTA's safety performance measures identified in the National Public Transportation Safety Plan.

The ASP goals are attained by achieving the following objectives:

- Establish safety policies, procedures, and requirements, which integrate safety into decision-making and operations.
- Assign responsibilities related to safety policies, procedures, and requirements.
- Verify adherence to safety policies, procedures, and requirements.
- Thoroughly investigate all events as warranted.
- Identify, analyze, and resolve all hazards in a timely manner.
- Meet or exceed safety requirements in specifications, facility construction, equipment installation, and system testing, operations, and maintenance.
- Meet or exceed safety requirements in vehicle operations and maintenance.
- Establish standards and procedures for safety training, and performance.
- Establish safety performance targets to quantifiably measure the level of performance based on the FTA's safety performance measures.

The ASP objectives are measured by:

- Confirm the Drug & Alcohol program is meeting or exceeding the FTA-mandated minimum rate of random drug tests (>50%) and alcohol tests (>10%) per year and compliant with 49 CFR Parts 40 and 655.
- Confirm 100 percent of LOMC-CSC, other contractors and CCH employees are receiving the required initial and annual training and certification for their position.
- Confirm at least one tabletop exercise and one full-scale exercise is performed annually.
- Confirm facility and equipment inspections are performed at least once per month and properly documented for DTS approval.
- Confirm vehicles are maintained at the appropriate intervals as specified in the LOMC-CSC Maintenance Management Plan and OEM specifications, and DTS conducts internal audits on an annual basis.
- Confirm the SSSC meet on a quarterly basis and official meeting minutes are prepared and distributed to stakeholders.
- Confirm the Emergency & Security Systems Committee (ESSC) and the System Safety & Event Investigation Committee (SSEIC) meet on a monthly basis and official meeting minutes are prepared and distributed to stakeholders.

- Confirm the risk management process is followed through review of each hazards severity and probability of the risk management program.
- Confirm the LOMC-CSC provides the DTS CSSO with an updated Hazard Tracking Log (HTL) on a monthly basis.
- Confirm the appropriate corrective action plans (CAPs) are prepared when safety risk deficiencies and hazards are identified which cannot be corrected by the end of the day.
- Confirm LOMC-CSC provides the DTS CSSO with an updated CAP log on a monthly basis and each CAP is assigned to an individual employee and their department with a target completion date.
- Confirm LOMC-CSC notification of all events is accomplished by Everbridge to DTS and HDOT.
- Confirm LOMC-CSC always submits a preliminary report within 48 hours after an event and a final event report, including all root causes and CAPs, are prepared in a format compliant with the HDOT PSP.
- Confirm LOMC-CSC submits monthly event reports until the final report is submitted to DTS.

5.4 Management Structure and Organization

The safety management policy has established the necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following DTS executives, key staff and committees as they relate to the development and management of the DTS' SMS program:

- The **DTS Director** is the **Accountable Executive** tasked with ensuring DTS' SMS is effectively implemented throughout Skyline. The DTS Director (Accountable Executive) is accountable for ensuring action is taken, as necessary, to address substandard performance in the DTS' SMS. As part of DTS' safety performance assessments, if deficiencies are identified, then DTS will develop and carry out, under the direction of the Accountable Executive, a plan to address the identified safety deficiencies. While day-to-day implementation and operation of DTS' SMS has been delegated to the DTS CSSO, the ultimate accountability for DTS' safety performance always rests with the DTS Director as Accountable Executive.

- The **DTS CSSO** is the **Chief Safety Officer (SMS Executive)** and has the authority and responsibility for day-to-day implementation and operation of DTS' SMS. The DTS CSSO holds a direct line of reporting to the DTS Director (Accountable Executive). Refer to Section 5.4.1.1 for additional information on the DTS CSSO.

- The **DTS Deputy Director** is a member of **Agency Leadership and Executive Management**, other than an Accountable Executive, Chief Safety Officer or SMS

Executive, with authorities or responsibilities for day-to-day implementation and operation of DTS' SMS.

- The **DTS Manager of Safety Systems (MSS)** and the **DTS Manager of Emergency & Security Systems (MESS)**, along with the **SSSC, ESSC, and SSEIC,** are designated as **Key Staff and Committees** to support the Accountable Executive and the Chief Safety Officer/SMS Executive in developing, implementing and overseeing the DTS' SMS. Refer to Sections 5.4.1.2, 5.4.1.3, and 7.9 for additional information on the DTS MSS, MESS, and the Safety Committees, respectively.

The management and oversight of the ASP is the responsibility of the DTS CSSO. The system has been built using a design-build-operate-maintain contracting strategy. Consequently, the implementation of the ASP activities is primarily the responsibility of two organizations:

- DTS
- LOMC-CSC

5.4.1 Safety and Security Office Organization and Oversight Responsibilities

The DTS Safety and Security Office is responsible for overseeing the safety and security programs of Skyline. The DTS CSSO has the overall responsibility of overseeing the implementation of the safety and security programs. The DTS CSSO has two direct reports to assist in the oversight of contractor safety and security activities.

5.4.1.1 Chief Safety and Security Officer

The DTS CSSO is responsible for safety, emergency, and security design criteria, policies, plans, procedures, work instructions, practices, and activities for multimodal transportation. The position has overall responsibility for the Safety and Security Office including environmental, health, and safety, system safety and compliance, emergency, cyber security, and security functions. The position serves as the safety, emergency, and security subject matter expert. The position is the primary liaison with the State Safety Oversight Agency and is responsible for safety and security certifications. The position manages and directs the complex development, implementation, monitoring, evaluation, and enhancement of safety, emergency, and security programs for multimodal transportation. The position is responsible for the reduction and mitigation of hazards, injuries, safety and security events, as well as threats and ensures compliance with local, state, and federal laws, regulations, and standards.

Other oversight responsibilities include, but are not limited to:

- Participating in monthly safety and security committee meetings to discuss system safety and security issues;
- Lead and chair the quarterly SSSC meetings;
- Reviewing the ASP and SSP annually;
- Ensuring annual Internal Safety and Security Audits and other audits as required are completed;
- Ensuring DTS submits an Annual Audit Report that documents the internal audits conducted for the previous calendar year to HDOT;
- Ensuring DTS submits annually a formal Letter of Certification signed by the Accountable Executive to certify its compliance with 49 CFR Part 673 to HDOT;
- Participating in annual emergency preparedness drills and tabletop exercises;
- Reviewing LOMC-CSC and other contractor corrective action plans;
- Participating in regular HDOT SSOA meetings; and
- Managing and updating SMS processes based on experiences and lessons learned.

The DTS CSSO manages the DTS MSS and DTS MESS to oversee and coordinate with LOMC personnel.

5.4.1.2 Manager of Safety Systems

The DTS MSS is responsible for multimodal agency safety plans including safety management systems, programs, and procedures as they relate to employee safety and health, and the operational, maintenance, and industrial aspects of safety. The position oversees hazard identification, reporting, mitigation and corrective action plans. Responsible for analyzing situations, identifying problems, recommending practical solutions, and evaluating outcomes. The position is responsible for the implementation and maintenance of the ASP, including SMS, and oversees LOMC-CSC and other contractors in performing hazard identification, reporting, mitigation, and corrective action plans.

Other oversight responsibilities include, but are not limited to:

- Participating in monthly committee meetings to discuss system safety issues, including the SSEIC;
- Conducting safety audits and inspections as required;

- Participating in audits related to system safety;
- Participating in annual emergency preparedness drills and tabletop exercises;
- Reviewing LOMC-CSC and other contractor's corrective action plans;
- Communicating lessons learned with employees and contractors;
- Implementing the Safety Systems Compliance Manual; and
- Providing SMS training to Skyline employees and contractors.

The DTS MSS oversees and coordinates with the LOMC-CSC O&M Railway Safety Manager, LOMC-CSC HSE Manager, and LOMC-CSC O&M Project Quality Manager.

5.4.1.3 Manager of Emergency & Security Systems

The DTS MESS is responsible for multimodal emergency and security programs, training, procedures, drills and exercises for operations and facilities. Responsible for the complex development, implementation, monitoring, evaluation, and enhancement of the DTS emergency and security system programs. Serves as liaison with other agencies to improve interagency coordination for emergency and security preparedness. The position is responsible for the implementation, and maintenance of the SSP, overseeing emergency management and security programs, training, procedures, drills and exercises, and will serve as the liaison with other agencies to improve interagency coordination for emergency and security preparedness.

Other oversight responsibilities include, but are not limited to:

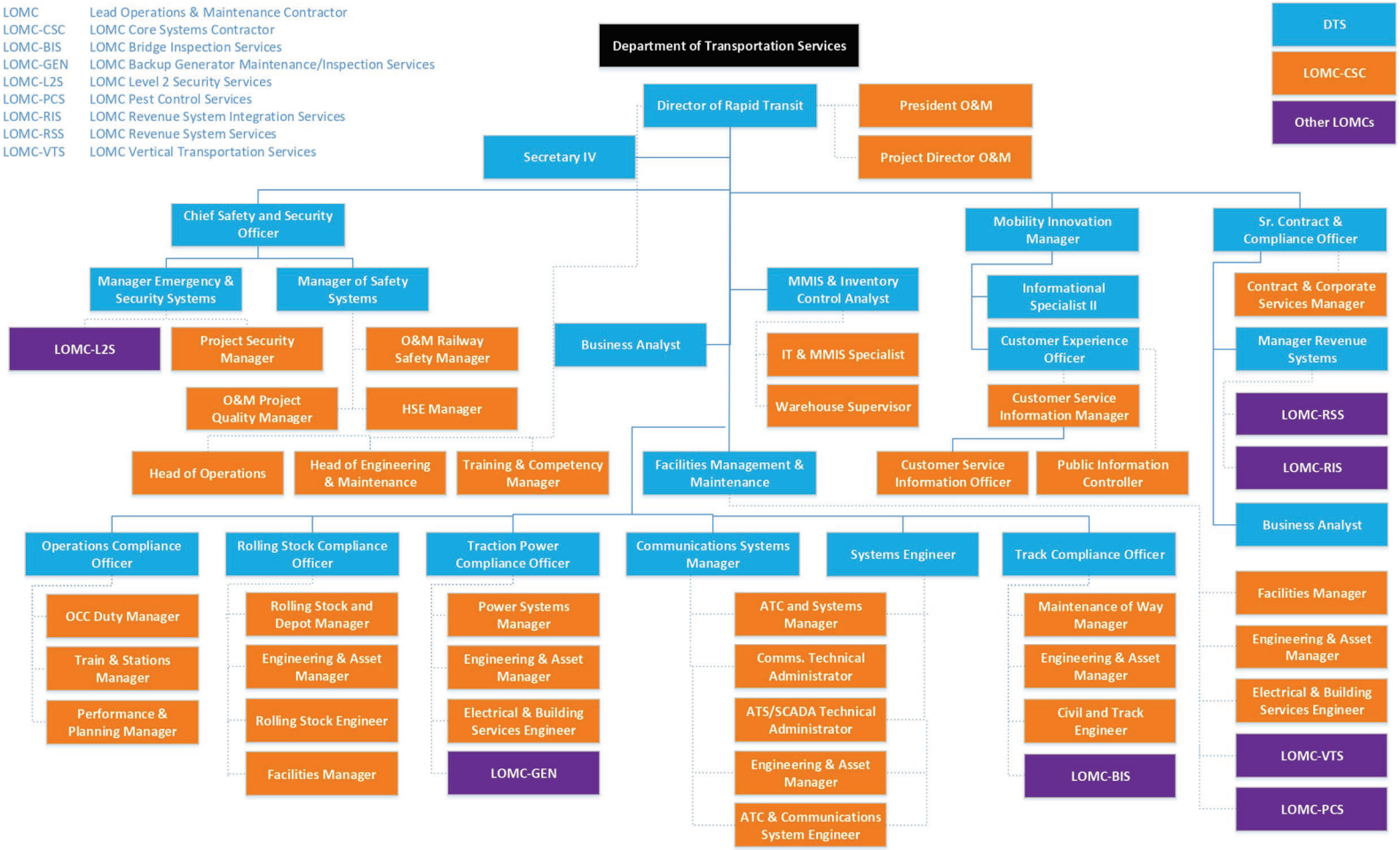
- Participating in monthly committee meetings to discuss emergency and security issues, including participating and co-chairing in the ESSC;
- Overseeing the Lead Operations and Maintenance Contractor – Level 2 Security Services (LOMC-L2S);
- Conducting security audits and inspections as required;
- Participating in audits related to system security and emergency preparedness;
- Participating in annual emergency preparedness drills and tabletop exercises;
- Reviewing and approving LOMC-CSC emergency drill after-action reports; and
- Implementing the Emergency and Security Systems Compliance Manual.

The DTS MESS oversees and coordinates with the LOMC-CSC Project Security Manager and LOMC-L2S personnel.

5.4.2 Contractor Oversight Structure

The following organizational chart (Figure 4) presents the contractor oversight structure for DTS.

Figure 4. DTS Contractor Oversight Structure



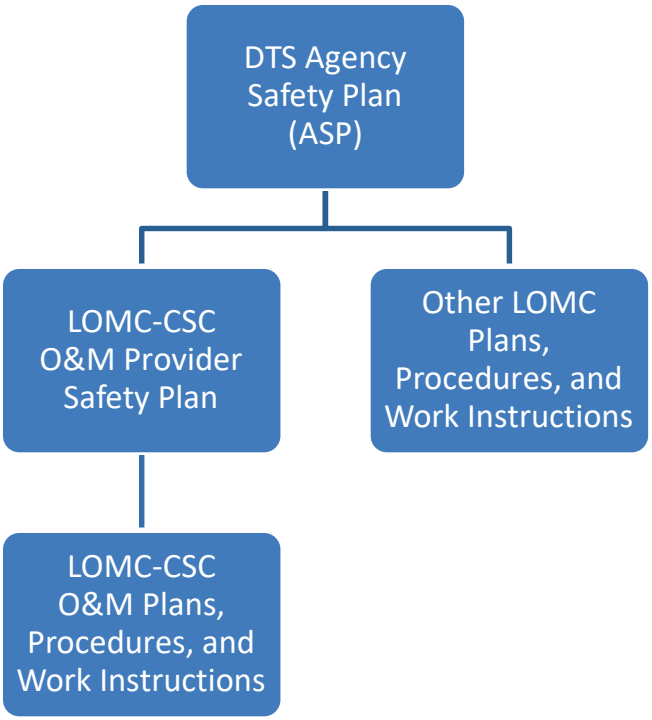
5.5 ASP Implementation

DTS is the agency responsible for overseeing and managing the ASP during operations and maintenance and is accountable for safety and security activities. The LOMC-CSC is responsible for the day-to-day safety and security activities on the system.

5.5.1 System Safety Document Hierarchy

As shown in Figure 5, LOMC-CSC as the O&M contractor supports DTS in the implementation of its ASP. Various supporting plans, procedures, and work instructions ensure LOMCs and subcontractors, with DTS oversight, achieve the ASP goals and objectives to include safety performance targets.

Figure 5. System Safety Document Hierarchy



5.5.2 ASP Activities and Tasks

Implementing the ASP activities is the responsibility of the following organizations:

- DTS

- LOMC-CSC
- LOMC-L2S
- LOMC-VTS
- LOMC-GEN
- LOMC-RIS
- LOMC-RSS
- LOMC-BIS
- LOMC-PCS

The DTS Safety and Security Office (SSO) is responsible for overseeing the implementation of the ASP. Specifically, the DTS SSO is responsible for:

- Issuing and maintaining the ASP
- Promoting SMS
- Reviewing and approving safety and security policies, rules, procedures, and work instructions prepared by LOMCs in support of operations and maintenance
- Chairing and Managing the SSSC
- Overseeing the Hazard Management Process implemented by LOMC-CSC
- Implementing Safety Certification Programs for new system modifications
- Reporting to FTA, NTD, NTSB, and HDOT on safety and security issues as required
- Ensuring LOMC-CSC provides timely Event Notification, Investigation and Reporting as described in the LOMC-CSC operating procedures
- Overseeing Emergency Response Planning/Coordination/Training as established by the LOMC-CSC Emergency Management Plan
- Overseeing Internal Safety, Security and Emergency Reviews and Audit Processes
- Ensuring DTS submits an Annual Audit Report that documents the internal audits conducted for the previous calendar year to HDOT
- Ensuring DTS submits annually a formal Letter of Certification signed by the Accountable Executive to certify its compliance with 49 CFR Part 673 to HDOT
- Ensuring Compliance/Procedures Reviews
- Audit LOMC Maintenance Reviews/Inspections
- Audit LOMC Training and Certification Reviews
- Demonstrating Compliance with local, state and federal requirements
- Overseeing a Hazardous Materials Program as defined by the approved LOMC-CSC Hazardous Materials Program Plan
- Ensure compliance with the Skyline Drug and Alcohol Program including conducting audits on the LOMC-CSC Drug and Alcohol Policy and Program as part of the DTS Internal Safety and Security Audit Program

LOMC-CSC is responsible for the day-to-day activities associated with operating and maintaining the rail system. The LOMC-CSC is responsible for implementing and maintaining its plans, procedures, and work instructions to support the following ASP responsibilities:

- Maintain a current SMS Implementation Plan with annual reviews and updates – The SMS Policy to be communicated throughout the organization and LOMC-CSC shall ensure each LOMC-CSC employee and each LOMC-CSC contractor (manager level and higher) is provided SMS training as part of new employee orientation including hazard reporting, event reporting, confidential anonymous reporting and the anti-retaliation policy. LOMC-CSC shall encourage all of its contractors to provide the same training to its remaining employees.
- Lead and chair the SSEIC, providing updates to the Event Log, CAP Log, Hazard Log, rules compliance, and injuries. The committee shares the outcomes of event investigations, status of corrective actions and/or mitigations, as well as applicable statistics. The SSEIC strives to control safety risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully.
- Maintain the systemwide Hazard Tracking Log. DTS is responsible for providing to LOMC-CSC all necessary information for hazards originating from other LOMCs for entry into the log.
- Update HNL-09111 O&M Provider Safety Plan annually and on an as-needed basis to ensure compliance with the DTS ASP.
- Develop and implement a risk reduction program to improve safety and security by reducing the number and rates of Safety Events, injuries and Assaults on Transit workers based on data submitted to the National Transit Database (NTD) under Section 5335. Continuously update safety and security performance targets for the risk reduction program using a 3-year rolling average of the data submitted to the NTD under Section 5335. Meet the performance targets for the risk reduction program.
- Maintain a current Safety Data Management process with annual reviews and updates – The process used to collect, maintain, analyze, and distribute safety data.
- Maintain current Event Notification, Reporting and Investigation Procedures with annual reviews and updates, including reporting to DTS on a monthly basis to support NTD reporting requirements as necessary.
- Maintaining a current Emergency Preparedness and Response Plan with annual reviews and updates.
- Maintaining a current Safety Risk Management Process, Policy and Procedures with annual reviews and updates including a detailed hazard management process.

- Change Control Committee (CCC), including Configuration Management – Process for identifying and assessing changes, which may introduce new hazards or impact the transit agency's performance.
- Corrective Action Plan Procedures – Process used to develop, implement, and track corrective actions, which address investigation findings as specified in the HDOT PSP.
- Prepare and establish operations and maintenance policies, rules, plans, procedures, and work instructions to include any bulletins, which are reviewed and updated annually.
- Rules Compliance Procedures – Operating and maintenance rules and procedures, which affect safety are regularly reviewed and updated.
- Maintain a current Facilities and Equipment Inspection Plan with annual reviews and updates ensuring regular facility and station inspections are conducted, memorialized, and deficiencies are logged typically as Work Orders in MMIS. Work Orders not closed in a timely manner may result in a CAP, as determined by the DTS CSSO or HDOT.
- Maintain a current Maintenance Audit and Inspection Program with annual reviews and updates, which confirm preventive maintenance and the corrective maintenance programs are conducted at regular intervals to ensure equipment does not compromise safety and performance.
- Maintain a current Training and Certification Program Plan with annual reviews and updates.
- Maintain a current Hazardous Materials Program with annual reviews and updates.
- Maintain a current Drug and Alcohol Policy and Program with annual reviews and updates.
- Maintain a current Employee Communications Program with annual reviews and updates.
- Conduct weekly Track Allocation Meetings to ensure maintenance activities on Skyline are carried out in a safe, compliant, and orderly manner. This includes mandating the submission of Work Block Permits from all personnel, which must encompass a detailed Job Hazard Analysis (JHA) and/or Activity Hazard Analysis (AHA). These documents are subject to review and approval by authorized LOMC-CSC personnel.

All LOMCs responsible for the day-to-day activities associated with operating and maintaining the system are responsible for implementing and maintaining its plans, procedures, and work instructions to support the ASP:

- **SMS Implementation:** All LOMCs are required to successfully complete one of the two available SMS training courses (DTS SMS or LOMC-CSC S-20E). The SMS Policy is communicated throughout the LOMC organizations through either the DTS or LOMC-CSC SMS Training. The SMS Course training includes Hazard Reporting, Event Reporting,

and Confidential/Anonymous Reporting. The Anti-Retaliation Policy/Good Faith Challenge is included in both the DTS and LOMC-CSC SMS Training. SMS training is one of the minimum courses required to perform work on Skyline.

- **Committee Meetings:** All LOMCs are invited to attend the SSSC meetings on a quarterly basis as a non-voting member. Non-CSC LOMCs are not required to attend SSEIC meetings unless they have an open CAP to provide an update on. The LOMC-L2S participates in the ESSC meetings on a monthly basis, along with the LOMC-CSC.
- **Hazard Tracking Log:** All LOMCs provide information on hazards to the DTS CSSO. DTS CSSO will coordinate with LOMC-CSC to enter reported hazards meeting the threshold of entering into the HTL.
- **Event Investigation:** LOMC-CSC has the responsibility to investigate all events which occur on Skyline. Other affected LOMCs are required to cooperate with the LOMC-CSC to produce event and supporting documentation.
- **Emergency Preparedness and Response Plan:** Only the LOMC-CSC and LOMC-L2S are required to maintain a current Emergency Preparedness and Response Plan with annual reviews and updates.
- **Management of Change:** In the event of a need for a change to a system, LOMCs are required to submit in writing any proposed changes to DTS for review and approval. Changes to the system are formally approved by DTS.
- **Corrective Action Plan Procedures:** All LOMCs are required to comply with the DTS CAP procedures to develop, implement, and track corrective actions, which address investigation findings as specified in the HDOT PSP.
- **Operations and Maintenance PPWs:** Prepare and establish operations and maintenance policies, rules, plans, procedures, and work instructions to include any bulletins, which are updated as needed.
- **Facilities and Equipment Inspection/Preventive Maintenance Plans:** All LOMCs are required to maintain a current Facilities and Equipment Inspection/Preventive Maintenance Plan with annual reviews and updates ensuring regular systems and equipment inspections are conducted, memorialized, and deficiencies are logged typically as Work Orders in MMIS. Work Orders not closed in a timely manner may result in a CAP, as determined by the DTS CSSO or HDOT.
- **Maintenance Audit and Inspection Program:** All LOMCs are required to maintain a current Maintenance Audit and Inspection Program with annual reviews and updates, which confirm preventive maintenance and the corrective maintenance programs are conducted at regular intervals to ensure equipment does not compromise safety and performance.
- **Training and Certification Program Plan:** All LOMCs are required to maintain a current Training and Certification Program Plan with annual reviews and updates.

5.5.3 Confidential Employee Reporting Program

DTS requires an anti-retaliation program, which enables both employees and contractors to report safety and security issues without fear of retaliation. DTS employees and its contractors must notify management when issues are identified. DTS encourages a positive workplace culture, which prevents unlawful retaliation against its employees and contractors and ensures whistleblowers are protected per the Whistleblower Protection Act. LOMC-CSC maintains a Safety Database to store all reported hazards and concerns from DTS and its contractors along with customers. All entities can report via phone, mailbox, QR code, radio, OCC, and orally to an LOMC-CSC or DTS employee. LOMC-CSC produces reports from the Safety Database, which are transmitted to the DTS CSSO monthly and presented at the SSSC meetings. DTS has full access to this Safety Database.

LOMC-CSC is also responsible for establishing a confidential employee reporting program to allow employees and contractors to report safety and security issues without fear of reprisal. This information is included as part of the Safety Data Base LOMC-CSC transmits to the DTS CSSO on a monthly basis.

The following areas are not covered under the confidential employee reporting program:

- Personal grievances unrelated to safety and security issues;
- Issues that are already being addressed through other established channels or procedures;
- Matters that do not pertain to the safety and security of Skyline operations or personnel; and
- Reports that are found to be intentionally false or misleading.

To ensure timely and effective communication with employees and contractors who report safety and security concerns to the DTS SSO, the following timetable has been established:

- Within 24 hours of receiving a report, DTS SSO personnel will acknowledge receipt of the report through a secure and anonymous channel. This acknowledgement can be provided via phone, email (if anonymity is preserved), or in person, ensuring anonymity is maintained.
- Within 7 days, DTS SSO personnel will conduct a preliminary review of the report and provide initial feedback through the same anonymous channel.

- If further investigation is required, DTS SSO personnel will complete a detailed investigation within 30 days and provide comprehensive feedback, ensuring anonymity is maintained.
- Within 45 days, DTS will implement necessary actions based on the investigation and follow up through the anonymous channel to ensure resolution.

Refer to HNL-09720 Whistleblower Policy for the timetable for feedback within the LOMC-CSC Confidential Employee Reporting Program.

5.5.4 Integration of Safety Functions into Operations and Maintenance Activities

The DTS SSO interfaces and communicates with other departments within the CCH, outside agencies, and contractors, including the LOMC-CSC.

Listed below are the primary departments and agencies which interface with the DTS SSO:

- LOMC-CSC
- LOMC-L2S
- LOMC-VTS
- LOMC-GEN
- LOMC-RIS
- LOMC-RSS
- LOMC-BIS
- LOMC-PCS
- Honolulu Police Department (HPD)
- Honolulu Fire Department (HFD)
- Honolulu Emergency Medical Services
- Honolulu Department of Emergency Management
- Department of Homeland Security, Transportation Security Administration

The DTS SSO works with these organizations to receive information, identify safety concerns, conduct internal reviews and inspections, develop recommendations and review and approve corrective action plans to address safety concerns, track and verify the implementation of recommendations and corrective action plans.

The DTS SSO coordinates with these departments and agencies through the following committees:

- SSSC

- ESSC
- SSEIC

Refer to Section 7.8 for further details on the rail operations safety and security review committees.

5.5.5 ASP Control and Update Procedures

The DTS CSSO submits the revised ASP to the SSSC, which has an equal number of frontline transit worker representatives, selected by a labor organization representing the plurality of the frontline workforce, and management representatives, and to the DTS Director (Accountable Executive), for review and approval of the revised ASP. Once approved the DTS CSSO submits the revised ASP and all referenced materials to HDOT for concurrence. Once HDOT comments are addressed, the Accountable Executive signs as the authorizer and presents the ASP to the Honolulu City Council for adoption.

5.5.5.1 Review of Annual Submission

Annually, DTS reviews and updates its ASP as necessary to ensure the plan is current at all times.

In the event DTS conducts its annual review and determines an update is not necessary for the year, DTS will prepare and submit by January 31 formal correspondence notifying HDOT of this determination.

In the event DTS conducts its annual review and determines an update is necessary for the year, DTS will submit a revised ASP to the HDOT Program Manager by January 31. As appropriate, referenced materials affected by the revision will also be submitted with the ASP.

To ensure consistency between the ASP and supporting documents, DTS requires the LOMC-CSC to annually review and update its O&M Provider Safety Plan concurrently while the ASP is in the review process. The LOMC-CSC O&M Provider Safety Plan is reviewed and accepted by the DTS CSSO.

In addition, DTS requires all other LOMCs to annually review and update their O&M plans, procedures and work instructions concurrently while the ASP is in the review process. All LOMC O&M plans, procedures and work instructions in support of the implementation of the ASP are reviewed and accepted by DTS.

The schedule for annual review of the ASP is provided in Table 3 below.

Table 3. Schedule for Annual Review of ASP

Task	Responsible Agency	Duration	Target Date
If ASP is not updated:			
Notifies HDOT that no update is necessary.	DTS	--	Jan 31
If notified no update is necessary, accepts or objects to DTS' determination and notifies DTS of their decision.	HDOT	30 days	Mar 2
If ASP is updated:			
Completes annual review for previous calendar year and submits revised ASP to HDOT.	DTS	--	Jan 31
If notified update is necessary, approves ASP or requests additional information.	HDOT	30 days	Mar 2
Submits additional information and revises ASP.	DTS	30 days	Apr 1
Reviews additional information and approves revised ASP.	HDOT	30 days	May 1
City Council's adoption of the ASP.	Honolulu City Council	90 days	July 30

5.5.5.2 Review of Periodic Submissions

The DTS CSSO is responsible for initiating changes to the ASP when deemed necessary. As needed, additional reviews of the ASP may be required to address specific issues based on implementation of and compliance with FTA and HDOT requirements; review of DTS or LOMC documents; major additions to Skyline, or other safety-related updates.

If the DTS CSSO identifies a change to the ASP as significant, DTS will submit a revised ASP to HDOT within 30 calendar days of the effective date of the change, otherwise, minor changes to the document will be submitted with the annual submission.

6 COMPONENT 2 – SAFETY RISK MANAGEMENT

The Safety Risk Management component is comprised of the processes, activities, and tools DTS and its contractors use to identify and analyze hazards and evaluate safety risks in operations and maintenance and supporting activities. It allows DTS to carefully examine what could cause harm and determine whether DTS has taken sufficient precautions to minimize the harm, or if further mitigations are needed.

DTS has established a Risk Management Process, which includes:

- Processes for hazard identification
- Risk assessment
- Mitigation development and tracking

In support of the DTS ASP, the LOMC-CSC developed and implemented a Safety Risk Management Process for Skyline, which would be comprised of the following activities:

- Safety Hazard Identification: methods or processes to identify hazards and consequences of hazards.
- Safety Risk Assessment: establish methods or processes to assess the safety risks associated with identified safety hazards, including an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritization of the hazards based on the safety risk.
- Safety Risk Mitigation: establish methods or processes to identify mitigations or strategies necessary as a result of the agency's safety risk assessment to eliminate or reduce the likelihood and severity of the consequences.
- Safety Risk Tracking and Reporting: establish methods or processes for tracking and reporting safety risks, unacceptable hazards, and undesirable hazards and provide on-going communication to the DTS CSSO.
- Develop and implement a risk reduction program with Safety and Security Performance Targets to improve Safety and Security by reducing the number and rates of Safety Events, injuries and transit worker assaults (based on the data submitted to the NTD on a monthly basis.

DTS oversees the LOMC-CSC Risk Management Program through the following activities:

- Conduct audits of the LOMC-CSC Risk Management Program as part of the DTS Internal Safety and Security Audit Program.
- Chair the quarterly SSSC meetings and discuss any hazards and risks identified by or reported to the LOMC-CSC.

- Review, approve, and track all corrective action plans.

6.1 Safety Risk Management Process Overview

The safety risk management process defines the on-going process of:

- Identifying hazards
- Evaluating and prioritizing mitigations for elimination or control of hazards
- Tracking identified hazards through resolution
- Reporting of hazards to the DTS CSSO, who notifies HDOT of "Unacceptable" hazards
- Regularly evaluating the effectiveness of implemented risk mitigations

6.2 Safety Hazard Identification Process

The hazard management process is the primary tool used to ensure the safety of activities, facilities, and vehicles. This process is accessible to all levels of the organization and is the means by which hazards are identified and analyzed for potential impacts on Skyline. The hazard management process includes hazard identification, hazard investigation, evaluation and analysis, hazard control and elimination, and hazard tracking, and will follow the guidelines as detailed below.

A safety hazard is any real or potential condition, which can cause injury, death, and/or damage or loss of equipment and property. Hazard Analyses (HA) is conducted in accordance with the FTA guidance document Hazard Analysis Guidelines for Transit Projects and in MIL–STD 882E, Standard Practice for System Safety. Hazard Analyses (HA) shall be conducted in a manner, which meets or exceeds the FTA guidance document Hazard Analysis Guidelines for Transit Projects and in MIL–STD 882E, Standard Practice for System Safety.

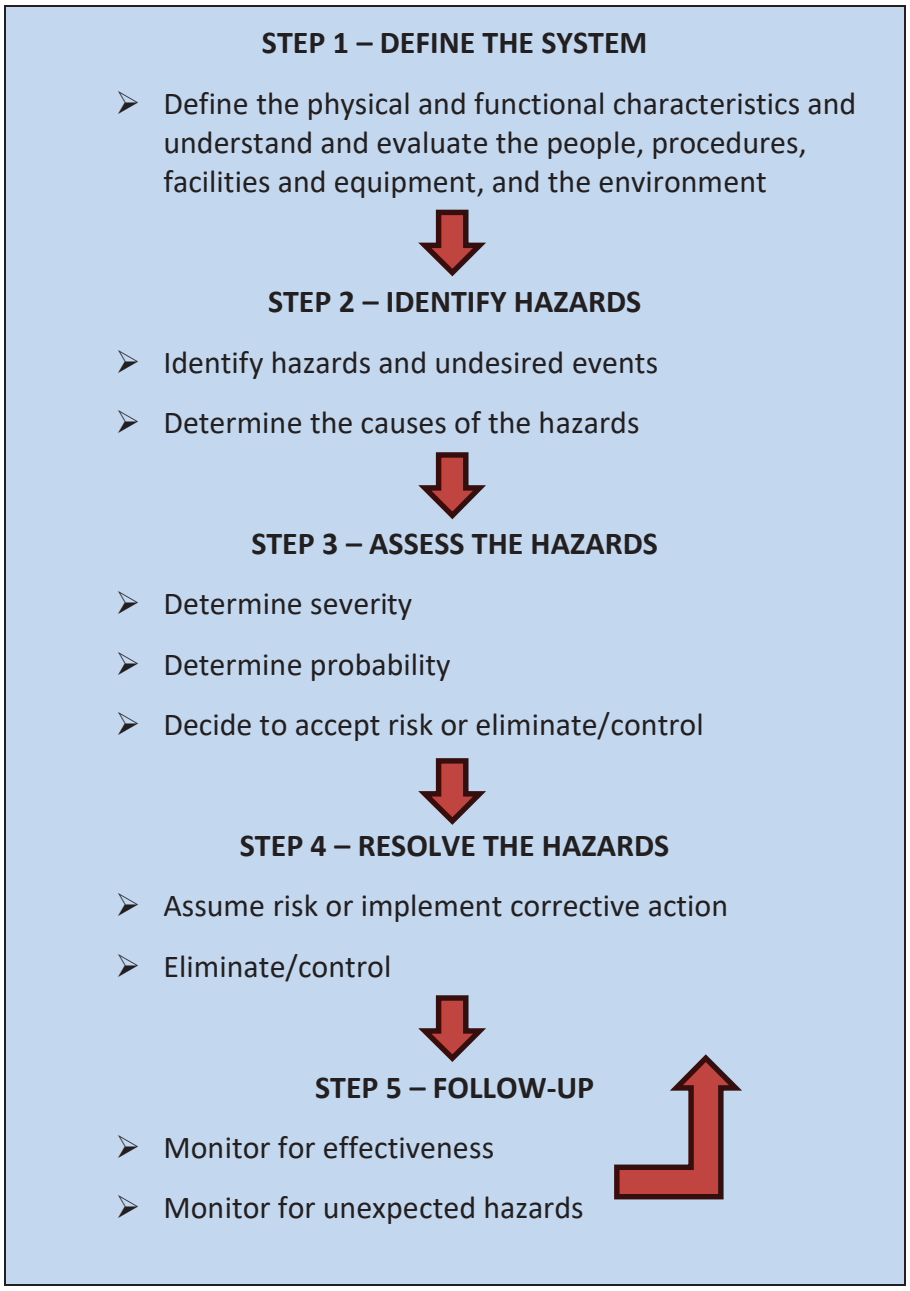
The objective of the hazard identification, analysis, and resolution process is to identify and define as many credible hazardous conditions as possible as early as possible and to eliminate or control these hazardous conditions or associated activities prior to their causing or contributing to the aforementioned conditions. This is accomplished by the following:

- Identifying potential hazards resulting from failure of system elements and determine their impact on the overall system, people, property, and the environment
- Identifying hazardous activities, which could affect the transit system's safe operation
- Identifying potential Safety Events and the consequences (e.g., fatalities, injuries, damage, and service interruptions) associated with each hazardous condition
- Identifying measures, which will prevent Safety Events by eliminating or controlling the underlying hazards

- Documenting the hazard analysis results in a clear and concise manner and facilitating resolution of the unresolved hazards until they are closed.

An overview of the hazard identification and resolution process is described in Figure 6.

Figure 6. Hazard Identification and Resolution Process



6.2.1 Methods for Defining the System

The first step in the hazard identification and resolution process is to define the physical and functional characteristics of the system to be analyzed. These characteristics are considered in terms of the individual elements, which make up the total system including: equipment and subsystems, procedures, people and the environment. A thorough knowledge and understanding of how individual system elements interface with each other is essential to the hazard identification effort.

6.2.2 Safety Hazard Identification and Investigation: Methods for Identifying and Evaluating Safety Risks

Contractors with DTS oversight, incorporate several methods for identifying hazards on the operating system. Hazard identification techniques used for the operations and maintenance of the system include, but are not limited to the following:

- **Employee Identified Safety Reports -** Through the implementation of SMS, all DTS and LOMC employees are encouraged and required to report hazardous conditions. These can be reported to OCC, to the Safety Hotline (confidentially and anonymously), through the SMS QR code, to a Supervisor, through the use of the LOMC-CSC's EcoOnline Reporting tool, through the use of the LOMC-CSC's EcoOnline QR Code.
- **Operations and Maintenance Inspection Reports** – Skyline employees and contractors routinely conduct inspections and/or preventive maintenance activities. During the course of those activities, Skyline employees and contractors may come across hazards which they are encouraged to report to a supervisor, OCC, or DTS. Tools available for reporting is described above in the employee identified safety reports section.
- **Close-Call/Near Miss Event Reports** – Through the implementation of SMS, all DTS and LOMC employees are required to report Close-Call events. Near Miss and Close-Call events are to be immediately reported to OCC.
- **Management of Change –** If DTS determines that a change may impact its safety performance, then DTS will evaluate the proposed change through its Safety Risk Management process.
- **Internal Safety and Security Audits –** DTS conducts internal safety and security audits on the activities identified in the ASP and SSP. DTS requires the LOMCs to initiate corrective action plans (CAPs) based on findings and recommendations from the internal safety and security audits, as necessary, which are added to the Skyline CAP log.
- **Emergency Tabletop and Drill Exercises –** LOMC-CSC conducts an annual emergency response exercise. Findings and recommendations from the exercises are documented in after-action reports and deficiencies result in corrective action plans (CAPs).

- **Operations Activity Reports including Customer Complaints –** The SSSC and DTS review customer complaints for hazardous conditions. Findings and recommendations from the committee reviews may generate corrective action plans (CAPs).
- **Other Agencies –** DTS and its contractors use notifications, publications, audits/inspections and applicable standards from federal, state, and local sources to collect hazard information on Skyline.
- **State Safety Oversight Agency and or the Federal Transit Administration –** Either Agency may be a possible source of hazard information.

Risk assessments are used to determine the acceptability of assuming the risk associated with assessing hazards and involves two primary steps: first evaluating the hazard severity (categorizing the hazard) and second evaluating hazard probability. A hazard severity rating is assigned to each hazard based on the definitions in MIL–STD 882E, Standard Practice for System Safety. It is a subjective determination of the worst case scenario, which could be anticipated to result from human error, design inadequacies, component failure, or malfunction. The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle not all hazards pose an equal amount of risk to safety.

DTS defines safety risk severity categories as a qualitative measure of the worst credible outcome, as indicated in Figure 7:

Figure 7. Safety Risk Severity Categories

Category	Description	Severity Definitions
1	Catastrophic	Operating conditions are such that human error, environment, design deficiencies element, sub-system, or component failure or procedural deficiencies may cause dire events resulting in major system loss, thereby requiring immediate cessation of the unsafe activity or operation.
2	Critical	Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies may cause severe harm to persons or major system damage thereby requiring immediate action including immediate cessation of the unsafe activity or operation.
3	Marginal	Operating conditions may cause minor harm or minor system damage such that human error, environment, design deficiencies, element, sub-system or component failure or procedural

		deficiencies can be counteracted or controlled without serious injury, illness or major system damage.
4	Negligible	Operating conditions are such that human error, environment, design deficiencies, element, sub-system or component failure or procedural deficiencies will result in no, or less than minor, harm or system damage.

The probability of occurrence level is assigned to each identified hazard based on the likelihood of its occurrence during the life of the System. A qualitative hazard probability is derived from research, analysis, or historical safety data from similar transit systems. Staff may use either deductive or inductive evaluation methods, depending on circumstances to determine ratings for severity and likelihood. Hazard probability levels are shown in Figure 8:

Figure 8. Safety Risk Probability Levels

Frequency	Level	Probability Definitions
Frequent	A	Likely to occur frequently to an individual item. Continuously experienced in the fleet inventory.
Probable	B	Will occur several times in life of an item; will occur frequently in fleet/inventory.
Occasional	C	Likely to occur sometime in life of an item; will occur several times in fleet/inventory.
Remote	D	Unlikely, but possible to occur in life of an item; unlikely but can be expected to occur in fleet/inventory.
Improbable	E	So unlikely, it can be assumed occurrence will not be experienced to an individual item; unlikely to occur but possible in fleet/inventory.
Eliminated	F	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.

6.3 Safety Risk Assessment Process

6.3.1 Evaluation and Analysis: Methods for Evaluating Safety Risks

Safety Risk assessment and prioritization criteria are established through the process documented in this section. All official risk assessment and prioritization activities and any required actions developed as a result of assessments, is led by the DTS SSO and its LOMCs. Once the severity and likelihood of the worst credible outcome have been established, the Safety Risk Index (SRI) can be calculated, i.e., the level of safety risk as a composite of severity and likelihood of the potential consequence of the hazard.

Figure 9. Safety Risk Index

Frequency of Occurrence	1	2	3	4
A	1A	2A	3A	4A
B	1B	2B	3B	4B
C	1C	2C	3C	4C
D	1D	2D	3D	4D
E	1E	2E	3E	4E
F	Eliminated			

A risk assessment determines the acceptability of assuming the risk associated with a hazard. It enables understanding the risk in relation to the costs, which may be incurred. The risk assessment matrix combines the severity and probability of the hazard and quantifies the necessity for implementing corrective measures to reduce the hazard to an acceptable level. DTS uses the Hazard Risk Assessment Matrix to prioritize hazardous conditions and focus resources on the most serious hazards requiring resolution. The results of the assessments are documented and presented to the SSSC for review and acceptance.

The Hazard Risk Index value determines the specific level of action required. Hazards with a risk index of "Unacceptable" or “Undesirable” are not permitted and must be eliminated, controlled, or reduced to an acceptable level.

Figure 10. Safety Risk Acceptance Criteria

	SRI	Decision Authority	Special Conditions
High	1A, 1B, 2A, 2B, 3A	Unacceptable	Requires immediate resolution
Medium	1C, 1D, 2C, 2D, 3B, 3C	Undesirable	Actions require CSSO review and approval, with concurrence from the AE
Low	1E, 2E, 3D, 3E, 4A, 4B	Acceptable with Review	Requires management review in consultation with CSSO or designee
Acceptable	4C, 4D, 4E	Acceptable	None – Can be managed at department-level

For "Unacceptable" hazards or safety risks, the DTS CSSO must notify HDOT within 24 hours or by 5:00 p.m. on the next regular working day, whichever is sooner, following the determination of the unsafe condition. The DTS CSSO will transmit an electronic copy via email or a hard copy via mail of the appropriately completed worksheets, forms, or other materials documenting the analysis and the identification of the unacceptable safety risk.

For "Undesirable" hazards or safety risks, the DTS CSSO must notify HDOT as soon as practicable or no later than the conclusion of the safety risk assessment.

For all other hazards and safety risks, LOMC-CSC is responsible for providing Hazard Log updates during the monthly SSEIC meetings.

If the hazard is currently mitigated, the investigation involves an assessment of the effectiveness of current mitigations or a determination of whether they are sufficient to address the associated risk, and if changes or additional mitigations are warranted to further reduce risk (until it reaches an acceptable level).

Based on the approved decision authority level, which results from the safety risk assessment—unacceptable, undesirable, acceptable with review, or acceptable—the department performing the assessment is responsible for immediately notifying OCC if they are not already involved. Ultimately the LOMC-CSC O&M Railway Safety Manager will notify the DTS CSSO. The DTS CSSO will notify the DTS Director (Accountable Executive) and HDOT as appropriate.

6.4 Safety Risk Mitigation Process

6.4.1 Hazard Control and Elimination: Strategy to Resolve / Minimize Exposure of Public, Personnel, and Property to Hazard / Unsafe Conditions

The Hazard and Risk Resolution process involves the analysis and corrective actions taken to reduce the risk associated with an identified hazard to the lowest practical level. The order of precedence for satisfying system safety requirements and resolving identified hazards is listed below:

- **Design for Minimum Risk** – Design new facilities and equipment to eliminate hazards. If an identified hazard cannot be eliminated, its associated risks must be reduced to an acceptable level through the design selection.
- **Use of Safety Devices** – In the event an identified hazard cannot be eliminated, or its associated risk cannot be reduced through design selection, the risk must be reduced to an acceptable level through the use of protective safety features or devices. Provisions must be made, and procedures must be issued, for periodic inspection and functional checks of safety devices.
- **Warning Devices** – When neither design nor safety devices can effectively eliminate identified hazards or reduce risk to an acceptable level, warning devices must be used to detect the condition and produce an adequate warning signal to alert individuals to the hazard. Warning devices will be standardized to minimize the probability of incorrect reaction of personnel to these warning signals.
- **Develop Special Procedures and Training** – When it is impossible or impractical to eliminate hazards through design selection or adequately reduce its associated risks through safety or warning devices, then approved procedures and special training programs must be used. Procedures may include the use of personal protective equipment (PPE). Precautionary notations and warning signs must be standardized. Employees who perform safety critical tasks require certification of proficiency and periodic recertification.

Typically, hazards are controlled by more than one corrective method. The use of warning, caution, and other forms of written advisories to control Severity Category I (Catastrophic) and Category II (Critical) hazards will be carefully reviewed to ensure no other additional countermeasures are necessary.

The last step in the hazard identification and resolution process is the follow-up. The Change Control Committee (CCC) for changes to Skyline proposed by LOMC-CSC, and the DTS Management of Change Committee (MOCC) for non-CSC changes proposed by DTS or by other

LOMCs, respectively, will monitor the effectiveness of the recommended countermeasures and ensure new hazards are not introduced as a result. DTS and its contractors use a hazard tracking system to track hazards until closure and reopen hazards if necessary. In the event there are design changes, deviations, or other changes to the elements of the system being analyzed, a new hazard analysis may be conducted to identify and resolve any potential new hazards. The Safety and Security certification process ensures all identified safety hazards and security vulnerabilities have been eliminated or reduced to an acceptable level prior to revenue service.

6.4.2 Hazard Tracking: Methods for Tracking and Reporting Safety Risks

The identification and management of hazards is a key element of the safety management program, which contributes to the safety program. The following, therefore, applies:

- Information relative to hazard identification is formalized in an HTL system which provides a means for monitoring completion of actions arising from hazard identification studies, in one central database.
- The HTL database allows all hazards to be listed, viewed, printed, sorted, and modified and thereby aides the management of the risk mitigation process.
- The HTL maintenance and update is an LOMC-CSC function, in coordination with the DTS and its LOMCs.
- The DTS CSSO reviews and accepts all HTL CAPs, and thereafter submits the CAPs to HDOT for review and approval. The LOMC-CSC provides an updated copy of the HTL to the DTS CSSO on a monthly basis.

LOMC-CSC, with DTS oversight, performs all the necessary activities pertaining to hazard analyses and risk assessment. This information is included in the HTL by the LOMC-CSC. The HTL contains the following information at a minimum:

- ID Number
- Hazard Description
- Date Identified
- Employee assigned to the Hazard
- Target date for completion
- Hazard Source
- Initial Hazard Risk Index
- Immediate Actions and Interim Mitigation (if applicable) with documentation
- Hazard Resolution/CAPs
- Post-mitigation Hazard Risk Index
- Status

Hazard sources include internal safety and security audits, hazard investigations, HDOT directives, event investigations, NTSB investigations, Three- year safety and security audits, emergency drills/exercises, other sources including HDOT and/or FTA oversight activities indicate an opportunity to intervene with an identified systematic problem or other concern/deficiency proactively before the problem/concern/deficiency becomes a reportable event (customer/employee/public hazard reporting).

In general, a hazard is fully controlled when all actions necessary to resolve the hazard are implemented to ensure the risk remains at an acceptable level. The hazard can be closed when:

- Mitigating design features have been implemented
- Safety tests and inspections are completed
- Operating instructions and procedures are established
- Maintenance instructions and plans are established
- Operator and maintainer training courses have been completed

Hazard owners must carefully consider each hazard and if necessary define the hazards specific actions to ensure the activities have been completed. It should be noted all actions must be completed for a hazard to be closed, and for each action actually taken, the documentary evidence of its closure must be referenced.

Periodically the LOMC-CSC needs to verify implemented hazard mitigations are still viable.

6.4.3 Reporting of "Unacceptable" Hazards

Hazards, which affect the safety and security of rail operations, classified as "Unacceptable" (likely to cause death, system loss, or severe environmental damage) are reported by the LOMC-CSC to the DTS CSSO within 4 hours telephonically, with recommendations to address the “Unacceptable” hazard. The DTS CSSO notifies the DTS Director (Accountable Executive), who will determine the appropriate course of action to preserve the safety of the system, such as implementing a speed restriction, shutting down a portion of the system, or shutting down the entire system until appropriate measures are taken.

The DTS CSSO will then notify HDOT within 24 hours with the identified “Unacceptable” hazard and the corrective actions implemented to minimize the hazard.

6.4.4 Investigations of Hazards

Hazard investigation is a critical process conducted to identify, assess, and mitigate safety risks associated with Skyline operations. These activities are essential to ensure the safety and

reliability of the Skyline system for customers, employees, contractors, and the public. In the event a hazard is identified, LOMC-CSC will investigate the hazard by assessing the safety risk and present appropriate safety risk mitigations to the DTS CSSO for review and approval prior to implementation.

LOMC-CSC prepares and the DTS CSSO reviews, accepts, and submits an initial report of the unacceptable hazard within 7 calendar days of the hazard being reported to HDOT. Updates of the investigation are sent to HDOT based on 7-day report.

6.4.5 Internal Review of Hazard Management Plan

DTS conducts a review and audit of the LOMC-CSC Hazard Management Plan as part of the DTS Internal Safety and Security Audit Program.

6.4.6 CAP Procedures and Compliance Requirements

Risk Assessment of hazards utilizing Figures 7, 8, 9, and 10, which are classified as 1A, 1B, 1C, 1D, 2A, 2B, 2C, 3A or 3B will require entry into the HTL and a formal written CAP and entry in the CAP log. All other Risk Index Values will be classified as "Compliance Requirement" and not require a CAP or entry on the CAP log.

6.4.6.1 CAP Program Requirements

DTS ensures the LOMC-CSC develops, implements, and maintains a written CAP Program which is compliant with this section and the HDOT PSP. The CAP procedures shall include:

- A description of the individuals, departments, and external agencies (to include HDOT, FTA, and NTSB) which have roles and responsibilities for the identification of the need for a CAP as well as CAP development, implementation, monitoring/tracking, and verification.
- A description of the events and/or ongoing program activities which trigger the development of a CAP, including the following minimum requirements:
    - **Internal Safety and Security Audit Program**: CAPs are developed when findings of non-compliance are identified from internal safety and security audit final reports.
    - **Hazards Investigations**: CAPs are developed to correct those elements or activities identified as deficient as a result of hazard investigations. In addition, HDOT may, during the course of an investigation, identify corrective actions to avoid or minimize the reoccurrence of the unsafe condition or address a related, systemic problem.

- **Formal hazard analyses (Preliminary Hazard Analysis, Failure Mode and Effects Analysis, Operations Hazard Analysis, Fault Tree Analysis**: CAPs are developed to address findings and recommendations from formal hazard analyses (Preliminary Hazard Analysis, Failure Mode and Effects Analysis, Operations Hazard Analysis, Fault Tree Analysis).
- **Event Investigations**: CAPs are developed when the results of the event investigations identify causal or contributing factors which can be minimized, controlled, or corrected to ensure the identical or similar situations will not reoccur ("reactive").
- **NTSB Investigations**: CAPs are developed based on the findings and recommendations included in NTSB final event reports, following review of the report by HDOT and the DTS CSSO.
- **Three-Year On-Site Safety and Security Audits**: CAPs are developed for findings resulting from HDOT Three-Year On-Site Safety and Security Audits.
- **Emergency Drills/Exercises**: CAPs are developed to address findings from After-Action Reports/Improvement Plans following emergency drills and exercises. Such exercises may include Tabletop Exercises, Functional Drills, and Full-Scale Exercises.
- **Other:** CAPs are developed when the FTA and/or HDOT's various oversight activities indicate the opportunity to intervene to address an identified systemic problem or other concern/deficiency before it can manifest as a reportable event. CAPs shall be developed by the LOMCs with review and approval by the DTS CSSO or required by HDOT in order to manage gaps or trends in safety performance identified using the SMS performance management process.

- A description of what the CAP will identify, including the minimum requirements outlined in this section.
- A description of the CAP internal and external notification process, including coordination with the DTS CSSO and HDOT.
- A description of the CAP internal and external review and approval process, including coordination with the DTS CSSO and HDOT.
- The plan shall describe the process the DTS CSSO will follow to resolve disagreements with HDOT regarding CAP development, approval, implementation, monitoring, or tracking.
- A description of the CAP monitoring and tracking process, including a sample CAP Tracking Log.
- A description of the process to review and update the CAP Program, as required, during the engineering and construction phase of the project.

- A description of the roles and responsibilities of the delegated duties and responsibilities to the LOMC, including an organizational chart;
- A description of the authorization to specific LOMCs to make notifications, to create reports, to submit corrective actions, and to speak on behalf of DTS on safety and security issues; and
- An identification of specific individual(s) within the LOMC with overarching responsibility for the delivery of contractor services and authority to resolve issues, such as non-responsiveness to HDOT-identified safety or security findings or concerns.

In all cases where a description of a process is required for inclusion in the CAP procedures, the entity responsible is required to develop and implement the process or procedure in order to comply with the requirement.

6.4.6.2 CAP General Requirements

In any instance in which a CAP must be developed and carried out, the DTS CSSO shall review and approve prior to submittal to HDOT for subsequent review and approval. The entity responsible shall not perform work on any CAP prior to review/approval from the DTS CSSO and HDOT. There is an exception for immediate or emergency corrective actions which must be taken to ensure immediate safety, provided DTS provides HDOT with timely notification and HDOT provides subsequent review and approval. (For purposes of compliance with the 49 CFR Part 674.37(a) requirement, notification by 5:00 PM on the following business day shall constitute “timely notification” to HDOT.)

Each CAP must describe, specifically, the actions to be taken to correct the deficiency identified by the CAP, the schedule for taking those actions, and the individual(s) responsible for taking those actions.

DTS periodically provides CAP updates to HDOT. HDOT may monitor DTS’ progress in carrying out the CAP through unannounced, on-site inspections, or any other means HDOT deems necessary or appropriate.

6.4.6.3 CAP Notification Requirements

The CAP Program includes a discussion of the notification requirements HDOT requires; Each CAP proposed by the LOMC will be developed with the intent of addressing the hazard or deficiency identified as a result of an investigation; the hazard management process; emergency drills or exercises; the internal safety and security audits performed by the DTS or the LOMC; or external audits performed by the FTA, HDOT, or other parties.

DTS ensures each CAP is submitted to HDOT for review and approval within 30 calendar days after the need for the CAP has been identified by either DTS, HDOT, FTA, or the NTSB. Depending on the complexity of the issue requiring corrective action, and at HDOT's discretion, DTS may be granted additional time to prepare the CAP. In cases where an emergency CAP is deemed necessary and implementation is initiated, DTS will be required to notify HDOT by 5:00 PM the following business day to initiate formal review and approval.

6.4.6.4 DTS Initiated CAPs

All CAPs require review and approval by the DTS CSSO and subsequently review and approval by HDOT. HDOT will notify the DTS CSSO of acceptance or rejection of a CAP within 10 calendar days of receipt a proposed CAP. If the review will take longer than 10 calendar days, HDOT will notify the DTS CSSO in writing on or before day 10 and provide a revised date for the completion of the review checklist. In the event HDOT and the DTS CSSO dispute the need, findings, or enforcement of a CAP, HDOT will allow the DTS CSSO 30 calendar days to submit its case. HDOT will then issue final direction to the DTS CSSO in writing regarding the CAP.

6.4.6.5 HDOT SSOA Initiated CAPs

In the course of carrying out its oversight responsibilities, if HDOT determines additional corrective actions are required in response to a safety hazard not properly addressed by DTS and its LOMCs through the CAP process, hazard management activities, or event investigation, HDOT will notify the DTS CSSO in writing. The notice will identify HDOT's concerns and direct the DTS CSSO to develop an appropriate CAP. In response, DTS and its LOMCs are required to prepare a new CAP and submit it to HDOT for review and approval within 30 calendar days. At the sole discretion of HDOT, depending upon the complexity of the concern, the 30-day requirement may be extended.

DTS and its LOMCs are responsible for (1) proposing corrective actions which are attainable and address HDOT's concerns, or (2) demonstrating to HDOT a CAP is not necessary because system safety or security is not compromised. If HDOT rescinds its decision to require a CAP, the rescission will be documented in writing. HDOT has the authority to reconsider its decision at any time.

6.4.6.6 NTSB Findings and Recommendations

NTSB findings and recommendations are transmitted directly to DTS, however, HDOT may be responsible for a response to NTSB's findings and recommendations in coordination with the DTS CSSO. As a result, the DTS CSSO and HDOT will review the NTSB findings and recommendations to determine whether or not a CAP should be developed. In coordination

with HDOT, the DTS CSSO and the LOMC-CSC will follow these steps to examine each recommendation included within the NTSB written report:

1. Confirm or clarify, if necessary, the problem identified in (or associated with) the NTSB recommendation;
2. Assess the NTSB-recommended corrective action(s) to evaluate its effectiveness in addressing the identified problem(s), using the appropriate analyses, including formal hazard analyses methods;
3. Assess the safety benefits of implementing the NTSB-recommended action and compare it with any similar DTS/LOMC-CSC or HDOT corrective actions. Identify alternative corrective actions with comparable safety or other benefits, if appropriate;
4. Determine, based on the analysis of the recommendation and existing/alternative corrective actions, if the DTS/LOMC-CSC will adopt the NTSB corrective action and/or additional corrective actions;
5. If the DTS CSSO, LOMC-CSC, and HDOT decide a CAP is necessary, the LOMC-CSC will develop and document appropriate CAPs as required, and in accordance with the CAP review and approval process outlined in this section and submit it to the DTS CSSO for review and approval within 30 days.
6. The DTS CSSO will submit the documentation and the analyses performed under this subsection and submit the analyses package to HDOT for review and approval within an agreed-upon timeframe following the receipt of the NTSB report;
7. If the DTS CSSO/LOMC-CSSO elect not to adopt a particular NTSB recommendation and its corresponding corrective action, HDOT may require the DTS CSSO to prepare a written justification and risk assessment in support of the preferred action of DTS.

HDOT will follow a similar process as described above for those NTSB recommendations applicable to HDOT.

6.4.6.7 CAP Review and Approval Process

HDOT will notify the DTS CSSO of its approval or disapproval of a CAP within 10 calendar days of receipt of a CAP. If the CAP review will take longer than 10 calendar days, HDOT will notify the DTS CSSO in writing on or before tenth and provide a revised date for the completion of the review checklist. In the event HDOT does not approve a CAP, HDOT will state its reasons in writing and recommend revisions. In these instances, the DTS CSSO will submit a revised CAP to HDOT within 30 calendar days following the disapproval.

6.4.6.8 CAP Issue Resolution Process

Safety and security issues of various severities necessitating the development of a CAP may arise at any stage of the system lifecycle, including operations and maintenance. It is important for HDOT and DTS and its LOMCs to communicate and resolve these issues in order to reach an agreement on corrective actions necessary to ensure a safe, secure, and resilient Skyline. The CAP issue resolution process extends to disputes regarding the overall necessity of a CAP, the appropriateness of the CAP itself relative to the identified hazard, and implementation of the agreed-upon CAP.

If the DTS CSSO disagrees with the rationale for HDOT's disapproval of a CAP and recommended revisions, HDOT and the DTS CSSO will attempt to resolve issues associated with CAPs at their level and appropriate with the urgency and severity of the issue as soon as possible. If HDOT and the DTS CSSO are unable to resolve the disagreement in a timely manner, they will jointly bring the issue to the attention of the DTS Director (Accountable Executive).

If the DTS Director (Accountable Executive) and HDOT Program Manager are unable to resolve the disagreement within a time period consistent with the urgency and severity of the issue, they will jointly bring the issue to the attention of the HDOT Director of Transportation. The HDOT Director of Transportation has ultimate authority over the SSOA Program, including CAPs. It is within their discretion to attempt to resolve safety and/or security issues with the DTS Director (Accountable Executive).
HDOT will consider the issue resolved when the DTS CSSO submits written notice of resolution, including the agreed-upon CAP developed based on the process described above.

6.4.6.9 CAP Monitoring and Tracking Log

LOMC-CSC maintains a CAP Tracking Log identifying all CAPs reviewed and approved by the DTS CSSO and HDOT, as well as the status of each CAP. The LOMC-CSC updates the CAP log on SharePoint and the information is made available to DTS and HDOT via SharePoint. In addition, the DTS CSSO provides regular updates of CAPs monthly at SSEIC meetings and quarterly at the SSSC meetings. Updates summarize the status of all open CAPs and any updates or new verification material since the last submittal. Submittal deadlines will be coordinated between the DTS CSSO and HDOT. Submittals may be subject to change based on holidays or extenuating circumstances, if agreed upon in writing by the DTS CSSO and HDOT.

Non-CSC LOMC CAPs and related updates are provided by DTS CSSO to LOMC-CSC for addition to the CAP log.

Log Element	Description
CAP ID Number	The number assigned to the CAP
CAP Title	A brief title describing the nature of the CAP
Date CAP Opened	The date the need for the CAP was formalized in writing
CAP Source ID	The number assigned to the source (internal audit, Safety Event, three-year review findings, etc.) of the CAP
Finding	A brief narrative summary of the finding which led to the CAP – what it is, what evaluation criteria was used, what the area of concern or deficiency is, etc.
CAP Requirements	The description of the corrective action required by DTS to address the finding
Initial Safety Risk Index	The safety risk severity and likelihood (or risk index) ratings initially assigned to safety risk
Individual/Department Responsible for CAP Implementation	The individual (name and title) and department assigned responsibility for implementation of the CAP
CAP Alternative	If DTS wishes to modify an open action, the proposed alternative must be described in sufficient detail so HDOT can determine its acceptability as a substitute for the originally approved CAP. If there is disagreement between DTS and HDOT regarding CAP changes, the process described in the HDOT PSP will be implemented to resolve differences
CAP Due Date	The estimated date of completion of the CAP. If DTS identifies an extension for the CAP is required, it will note the change here as well as in the CAP status updates
CAP Status Updates	The periodic updates provided by the responsible individual/department to implement the agreed-upon CAP
Issues Preventing Resolution	Issues that prevent the timely and adequate resolution to the CAP. This shall be updated in cases where a CAP due date extension is requested
CAP Verification	For CAPs closed since the last submittal, the log must indicate when and how DTS verified implementation
Post-mitigation Safety Risk Index	The safety risk severity and safety risk likelihood (or risk index) ratings after implementation of the CAP
Status	The status of the CAP. Status may be designated as pending, open, in progress, or closed
CAP Completion Date	The actual completion date for the identified CAP

6.4.6.10 Coordinating with HDOT SSOA

The DTS CSSO is the point-of-contact for reporting hazards, submissions of the hazard log, and providing HDOT with all materials (audio/video files, relevant logs, reports, and /or audits), which may be useful for investigation purposes and any other relevant clarification. The hazard log follows the criteria noted for the hazard log in this plan.

6.5 Transit Operations Safety Risk Reduction Program

Pursuant to the BIL Revisions to 49 USC 5329(d), DTS established a risk reduction program for transit operations to improve safety by reducing the number and rates of Safety Events, injuries and assaults on transit workers based on data submitted to the NTD.

DTS and the LOMC-CSC has taken the following key steps to establish a risk reduction program for transit operations:

- Annual review and updates to the ASP and O&M Provider Safety Plan.
- Establishment of the SSSC, with participation from frontline transit worker representatives in the decision-making process, as well as the SSEIC and ESSC, to better identify safety and security risks and implementing effective mitigation measures.
- Establishment of risk reduction performance targets based on data submitted to the NTD. Refer to Section 7.4.2 for additional information.
- LOMC-CSC Emergency Training for events affecting Skyline such as fires, flooding, active shooters, seismic events, and road vehicle and other emergency events.

The LOMC-CSC, with DTS oversight, must follow the Safety Risk Management Process and identify, document, and assess current safety risk reduction strategies and mitigations for effectiveness to assure they are performing as intended.

7 COMPONENT 3 – SAFETY ASSURANCE

The Safety Assurance component assures mitigations are implemented, adhered to, appropriate, effective and sufficient in addressing the potential consequences of identified hazards. Mitigations developed under the Safety Risk Management process are reviewed to determine if (1) the mitigations are effective, and (2) to ensure no new risks have been introduced through implementation of the mitigations. Safety Assurance also ensures SMS is effectively meeting DTS' performance targets. DTS ensures its safety objectives are met through the collection and analysis of safety data, including the tracking of safety risk mitigations.

The SSSC reviews and reassess safety data outcomes on a quarterly basis to advise safety performance metrics and key performance indicators for continuous improvement. Refer to Section 7.4 for the DTS' performance targets.

DTS implements its Safety Assurance process through the active monitoring of operations, safety reporting systems, event notification, investigation and reporting, drug and alcohol program oversight, routine workplace observations, inspections, audits, facilitating committee meetings and other activities designed to support safety oversight and performance monitoring.

LOMC-CSC, with DTS oversight, performs the following:

- **Safety Data Acquisition, Collection and Analysis:** Monitor and measure safety performance monitoring and measurement, report near-misses, close calls, trespassing, and other hazards and vulnerabilities. Assist and cooperate with HDOT for announced and unannounced RBI activities;
- **Rules Compliance:** Monitor the system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
- **Management of Change and System Modifications:** Ensure changes to the baseline/existing system are reviewed for conformance and identify and assess potential hazards before making changes to documents, equipment, facilities, and the system. Maintain a process for identifying and assessing changes, which may introduce new hazards or impact DTS' safety performance; ensure all LOMCs are part of this process; ensure all LOMCs are provided SMS training and taught to submit hazards to OCC so as to maintain a single Hazard Log. Monitor operations to identify any procedures and/or work instruction that may be ineffective, inappropriate, or not implemented as intended;

- **Continuous Improvement:** Participate in the SSSC to review health, safety, security, environmental, and quality issues, reports, investigations, corrective action plans to include safety improvements and ensure continuous improvement;
- **Safety-Related Facility and Equipment Inspections and Audits:** Perform preventive maintenance activities, inspections and audits of facilities in accordance with the LOMC-CSC Maintenance Management Plan and OEM specifications;
- **Safety-Related Procurement Process and Procedures:** Ensure compliance with safety principles and safety requirements in implementation of the LOMC-CSC procurement process. Coordinate with the hazard management process, and ensure safety and security analyses are performed as required, hazardous materials requirements are met, roadway worker protection requirements are provided, all required employee training is conducted, and all affected policies, rules, procedures and work instructions are updated and implemented;
- **Event Notification, Investigation and Reporting:** Ensure compliance with internal and external notification procedures in the event of Safety Events. Conduct investigations of events to identify causal factors and prepare investigation reports as required. Coordinate with DTS to ensure compliance with HDOT and NTD reporting;
- **Safety Committees:** Participate in committee meetings with the SSSC on a quarterly basis, and with the ESSC and the SSEIC on a monthly basis, and ensure that an equal number of frontline transit worker representatives and management representatives from the LOMC-CSC are in regular attendance at the SSSC and are involved in the decision-making process;
- **Internal Safety and Security Audit Program:** Participate in internal safety and security audits conducted by DTS; and
- **Safety Plan Documentation:** Maintain all documentation related to the implementation of SMS, and results from SMS processes and activities, for a minimum of three years after they are created, in accordance with 49 CFR 673.31.

All LOMCs, with DTS oversight, perform the following:

- **Safety Data Acquisition, Collection and Analysis:** Report near-misses, close calls, trespassing, perimeter fence breaches and other hazards and vulnerabilities to the LOMC-CSC. Assist and cooperate with HDOT for announced and unannounced RBI activities;
- **Management of Change and System Modifications:** In the event of a need for a change to a system, LOMCs are required to submit in writing any proposed changes to DTS for review and approval;

- **Continuous Improvement:** Participate in the SSSC meetings, reports, investigations, and corrective action plans to include safety improvements and ensure continuous improvement;
- **Safety-Related Facility and Equipment Inspections and Audits:** Perform preventive maintenance activities, inspections and audits of facilities in accordance with their respective maintenance management plans and based on OEM specifications;
- **Safety-Related Procurement Process and Procedures:** All materials procured by LOMC-CSC have been reviewed and approved by DTS. Deviations from the current approved list are required to go through the MOC process. Other LOMCs requesting a change from the original contractual material list must submit an MOC form in writing to DTS to deviate from the approved list of materials and the MOC must be approved prior to implementation. Prior to the start of work, LOMCs submit a list of hazardous materials and equipment to DTS for review and approval and to ensure the materials are compliant with the LOMC-CSC hazard management process and to ensure safety and security analyses are performed as required to ensure safety of Skyline customers and LOMCs. DTS ensures roadway worker protection requirements are met by all LOMCs. LOMCs are required to complete the minimum required training courses in order to receive a contractor badge to perform work on Skyline, which covers Skyline policies, rules, and procedures. DTS and LOMC-CSC conduct regular inspections of LOMC employees to ensure training compliance. LOMCs must submit PPWs to DTS for review and acceptance prior to start of work;
- **Event Investigation:** All LOMCs are required to cooperate with the LOMC-CSC in event investigations;
- **Safety Committees:** All LOMCs are invited to attend the SSSC meetings on a quarterly basis as a non-voting member. Non-CSC LOMCs are not required to attend SSEIC meetings unless they have an open CAP. The LOMC-L2S participates in the ESSC meetings on a monthly basis, along with the LOMC-CSC;
- **Internal Safety and Security Audit Program:** Participate in internal safety and security audits conducted by DTS; and
- **Safety Plan Documentation:** Maintain all documentation related to the implementation of SMS, and results from SMS processes and activities, for a minimum of three years after they are created, in accordance with 49 CFR 673.31.

7.1 Safety Data Acquisition, Collection and Analysis

The analysis of system specific data is used to determine trends and patterns in system operation. Used as part of the hazard management process, data collection and analysis identify hazards before they result in Safety Events by such techniques as trend analysis. Safety

data collection and analysis is a vital component of efforts to improve system safety performance.

The LOMC-CSC has established methodologies for collecting, maintaining, analyzing and distributing safety data to monitor and measure safety performance.

In coordination with LOMC-CSC, DTS identifies all data reporting requirements from LOMCs. Examples of safety data collected include:

- Daily unusual event logs
- Operator and supervisor reports
- Maintenance data
- Analysis of vehicle and personnel records
- Procurement contracts, collected and analyzed to support improvements in performance and monitor compliance

7.1.1 HDOT Risk-Based Inspection Program Requirements

Pursuant to 49 USC 5329 and the HDOT PSP, HDOT has the authority to enter and conduct RBIs, with and without advanced notice to DTS, of Skyline facilities and property, including infrastructure, equipment, records, personnel, and data, associated with DTS that HDOT oversees. As such, DTS and LOMCs are required to assist and cooperate with announced and unannounced RBI activities.

The RBIs HDOT performs may require or include:

- Document, video, record, and data requests relevant to the inspection activities
- Interviews and observations
- Measurements and testing

DTS explicitly adopts HDOT's RBI policies and procedures as contained in the latest HDOT PSP.

7.1.1.1 Risk-Based Inspection Data Sources

HDOT will utilize a variety of data sources for its RBI program. The specific data in use will vary based on the intent of the inspection and the available data. HDOT requires from DTS summary data, raw data, and/or the collection of new data in order to facilitate HDOT SSOA RBIs.

The most current list of data sources that HDOT may employ includes the following:

HDOT SSOA RBI Data Sources as of October 2023		
Data Required from DTS	**Frequency to be Shared**	**Delivery to HDOT SSOA**
Safety Program Data		
All data collected when identifying hazards and assessing, mitigating, and monitoring safety risks	Minimum quarterly or whenever there are significant data updates	Upload to HDOT SSOA Dropbox
Operations Report Maintenance Report	Monthly	Upload to HDOT SSOA Dropbox
HSSQE Report	Monthly	Upload to HDOT SSOA Dropbox
Human Resources Report	Monthly	Upload to HDOT SSOA Dropbox
Passenger Complaints Report	Monthly	Upload to HDOT SSOA Dropbox
Monthly Management Reports	Monthly	Upload to HDOT SSOA Dropbox
Learning management system and training data reports	As needed	Format to be determined by SSO program manager
HDOT may occasionally require access to DTS data and associated electronic and storage systems, including DTS and contractor maintenance management information systems and learning management	At HDOT SSOA discretion	Format to be determined by SSO program manager

HDOT SSOA RBI Data Sources as of October 2023		
Data Required from DTS	**Frequency to be Shared**	**Delivery to HDOT SSOA**
systems, such that HDOT can access these data without assistance from DTS or its contractors.		
Maintenance Data		
Structural inspection data including post-tensioned tendon monitoring system data	Quarterly	Email to SSO program manager (may require HART coordination)
Measurement and inspection data from known past issues such as wheel back to back, track frog clearances, etc.	As requested by HDOT SSOA	Email to SSO program manager
Inspection Data		
Alarm report (from OCC)	Monthly	Email to SSO program manager
Field inspection reports including from maintenance, operations supervision, security, and other personnel	As requested by HDOT SSOA	Email to SSO program manager

Note that the frequency (in the title of the report) indicates report production schedule, not its intended use/frequency of review by HDOT SSOA.

7.1.1.2 Risk-Based Inspection Locations and Access

To increase clarity in its RBI program, HDOT maintains the following list of potential geographical and physical locations that it may enter for such inspections, as well as a list of locations that may require special arrangements (such as a DTS escort). This list will be updated

as needed and any locations not covered under this list will be evaluated by HDOT for potential safety or security impacts and added to the list as needed. During all times, HDOT SSOA personnel will conduct activities in accordance with the requirements of the location, e.g., stowing and securing personal electronic devices in the OCC, utilizing appropriate PPE in shop locations, etc. For DTS and Skyline, RBI locations and subjects include the following without limitation:

Risk-Based Inspection Locations	
Location/Item	**Arrangements Needed**
Public areas including stations, vehicles, and other in-service facilities	None
Non-revenue vehicles	Appropriate training, escort based on location, PPE
Passenger vehicles	None when in service, appropriate training, escort, and PPE when in maintenance areas as needed
Rail right-of-way and yard areas	Appropriate training, escort, PPE
Train control rooms, traction power substations, communications and networking rooms, and similar locations	Appropriate training, escort, PPE
Shops, maintenance facilities, and similar locations	Appropriate training, PPE, escort for specialized locations but not by default
OCC including backup control centers	None
Offices, records locations	None
Construction sites	Appropriate training, PPE, escort for specialized locations but not by default
Train and operations testing areas	Appropriate training, escort, PPE

Risk-Based Inspection Locations	
Location/Item	**Arrangements Needed**
Meetings with DTS personnel	None
Event investigation locations	Appropriate training, escort, PPE as needed

HDOT will maintain, at a minimum, an electronic proximity card (or multiple cards) that allows access to all areas required for RBIs.

7.2 Rules Compliance

Operation and maintenance rules are reviewed on a regular basis through established methods to ensure all safety considerations have been made and the process is documented. Additionally, LOMC-CSC employees are evaluated for rules compliance to assess competency. The LOMC-CSC is responsible for monitoring the system for compliance. HNL-09734 Rules Compliance Evaluation Program is reviewed and accepted by DTS. The LOMC-CSC report back to DTS on inspections conducted via SSEIC meetings and through the Safety Database.

In compliance with the HDOT PSP, relevant LOMC-CSC procedures are reviewed as part of the DTS Internal Safety and Security Audit Program.

7.2.1 Review of Rules and Procedures

Rules and procedures governing Skyline are reviewed by the Rules and Procedures Committee (RPC). The LOMC-CSC Managers and Supervisors conduct rule compliance inspections on a weekly basis. The LOMC-CSC O&M Railway Safety Manager compiles and reports results of rules and procedures inspections at the monthly SSEIC meetings.

DTS performs weekly inspections of all LOMC-CSC rules and procedures and conducts internal reviews and audits as part of the Internal Safety and Security Audit Program.

The LOMC-CSC Head of Operations, as the RPC chair, is responsible for distribution of new rules and procedures.

7.2.2 Process for Ensuring Rules Compliance

The LOMC-CSC and its contractors are required to conduct rules evaluations on a weekly basis. The evaluations include, but are not limited to:

- Operations Supervisors, Controllers, and Operators
- Engineering and Maintenance Engineers, Supervisors, Technicians, Repairers, and Storekeepers
- LOMC-CSC Subcontractors

7.2.3 Compliance Techniques

LOMC-CSC staff compliance with rules, procedures, and work instructions are evaluated by LOMC-CSC Managers and Supervisors. LOMC-CSC determines the method of evaluation and the LOMC-CSC O&M Railway Safety Manager maintains the related database. LOMC-CSC employees who fail to demonstrate competency are required to attend refresher training.

7.2.4 Documentation

DTS rules compliance audits are documented in audit reports which include completed checklists and non-compliances items and highlighted corrective actions are reported. All CAPs are reviewed and approved by DTS and HDOT. Once the review and approval process is completed, the LOMC-CSC adds the CAPs to a CAP log and provide monthly status updates to the DTS CSSO.

7.3 Management of Change

DTS has an established process for identifying and assessing changes that may introduce new hazards or impact the safety performance of Skyline. If DTS determines that a change may impact its safety performance, then the proposed change is evaluated through the Safety Risk Management process.

Management of change is critical to an effective Safety Assurance program. The primary purpose of management of change and system modifications is to ensure changes to the baseline/existing system are reviewed for conformance and to identify and assess potential hazards before making changes to documents, equipment, facilities, and the system. Safety critical documents, facilities, vehicles, equipment, and systems are subject to management of change and formal document control procedures. Other examples include, but are not limited to policies, rules, plans, procedures, work instructions, training materials, drawings, and engineering reference information.

These documents are subject to review or revision as a result of (not exclusive):

- Safety Event procedures
- Major service changes
- Accumulation of special instructions, notices and bulletins

- Proposed design changes to facilities, equipment, or vehicles
- Improvements, right of way permit requests, etc.
- Policy changes

DTS participates in the Change Control Committee (CCC) and approves changes and system modifications to Skyline proposed by LOMC-CSC. The Director of Rapid Transit is the DTS signatory for LOMC-CSC proposed changes.

The CCC is responsible for reviewing all LOMC-CSC operations and maintenance changes to Skyline and ensures the impacts and implications are considered and understood prior to DTS acceptance and implementation of a change. This includes safety, security, and technical matters.

The DTS CSSO reviews and approves HNL-09619 Management of Change.

In addition, the DTS Management of Change Committee (MOCC) is responsible for reviewing all non-CSC operations and maintenance changes to Skyline proposed by DTS or other LOMCs. The DTS MOCC follows HNL-09619 as a guideline for the change management process for both internal and external changes. Refer to DTS ROM-00003 Management of Change Committee Charter for further details.

7.3.1 System Modifications

This section describes the procedure used to ensure safety concerns are addressed in modifications to existing systems, vehicles, and equipment, which do not require formal safety certification, but which may have safety impacts.

This process assures safety is not adversely impacted by modifications to the system (facilities, vehicles, equipment, materials, or procedures).

7.3.1.1 Modification Process

The modification process consists of:

- Identifying responsibilities of the Project Manager or equivalent in submitting request and documentation
- Ensuring compatibility with existing system;
- Ensuring any potential hazard associated with system modifications of any kind is worked into the Hazard Management Process;
- Ensuring design, as-built documentation, and rules and procedures reflect the considered modification;
- Ensuring employees are aware of the modification and re-trained if necessary;

- Identifying sign-off procedures showing all affected stakeholders have been involved;
- All analysis for modifications is reviewed and tracked through the SSSC; and
- Assigning CAPs to ensure all items, which pose a hazard are closed out (refer to HNL-09623 Quality Nonconformity, Corrective & Preventive Actions Procedure).

When a modification must be implemented, the following LOMC-CSC areas are involved:

- QA, RAMS, HSE, and Railway Safety: Examines requests for modifications and ensures associated hazards (if any) are properly managed. All departments have the responsibility to notify the LOMC-CSC Training Department of updates to its material as needed per the modification.

- Engineering: Makes requests for modifications, outlines implementation principles, methods and required testing, reviews test results (where applicable), ensures all affected documentation is coherently updated and ensures modifications are tracked within the configuration management process.

- Operation & Maintenance: Interfaces with other areas for required Work permits, ensures O&M documentation is updated and ensures re-training for O&M staff (if necessary) is performed.

The CCC in coordination with a DTS SSO representative provides a safety and security review and approval of all proposed design changes and ensures all other modifications are reviewed for hazards.

7.3.2 Configuration Management

LOMC-CSC is responsible for the configuration management process as detailed in HNL-09705 Asset Configuration Change Control Management Procedure, to be reviewed and accepted by DTS.

7.3.2.1 Process for Change

Proposed changes to the system, its facilities, operations, or vehicles go through a change control process overseen and accepted by DTS. The LOMC-CSC is responsible for the Configuration Management of the Skyline systems and facilities, with oversight by the CCC. The DTS CSSO participates in the CCC meetings to ensure safety and security are considered in the decision-making process.

Configuration Control ensures the following controls are implemented:

- All changes are uniquely identified and documented.
- An impact analysis is performed for every significant change.

- Only approved changes are implemented.
- All required employee training is conducted before implementation.
- All affected drawings, policies, rules, plans, procedures, and work instructions are updated to support implementation.

The following mechanisms are typically used for change management:

- LOMC-CSC and DTS follow a procedure for the MOC process.
- In the event of a need for a change to a system, other LOMCs are required to submit in writing any proposed changes to DTS for review and approval.
- Change Control Committee (CCC): this is the mechanism set up with representatives of management responsible for the approval/disapproval of all proposed changes.
- Subject Matter Experts: experts from various disciplines review and comment on any proposed changes to include contributing to an impact analyses and detailed change implementation plans for major changes and present them to the CCC.
- Once the change is approved by the CCC, the individual technical groups will implement the change following their own internal procedures. These procedures include the updating of affected documentation including operation & maintenance manuals, and notifications for all affected departments and agencies.

7.3.2.2 Authority for Change

The CCC typically has the final decision authority over the acceptance of proposed changes. Any change is formalized by proper documentation signed by authorized employees across organizations. Discrepancies or issues with items that cannot be resolved by the CCC are escalated to the DTS Director (Accountable Executive) and the DTS Director of Rapid Transit.

7.4 Continuous Improvement

Continuous improvement is defined by the FTA as a process by which a transit agency examines safety performance to identify safety deficiencies and carry out a plan to address the identified safety deficiencies. Reviews for safety improvements shall be required for all levels of employees to complete. DTS uses the SSSC to review health, safety, security, environmental, and quality issues, reports, investigations, corrective action plans to include safety improvements. The committee tracks these improvements until they are fully implemented. In addition, the committee can direct reviews to evaluate risks/safety concerns, create and execute Corrective Action Plans to continuously improve safety. The committee activities are also expected to include any improvements and changes related to SMS based on experience and changes in the risk environment.

7.4.1 Safety Performance Targets

Pursuant to 49 CFR 673.11(a)(3), DTS is required to set safety performance targets based on the fourteen (14) safety performance measures established in the FTA's National Public Transportation Safety Plan, Version 2 dated April 2024. DTS has established the following annual safety performance targets. Aspirational safety performance targets, including zero fatalities, are set for the initial operating segment. Rates are calculated per 100,000 VRM.

Table 4. Annual Safety Performance Targets

Safety Performance Measure	Description	Target
Major Events	This includes all safety and security major events as defined by NTD.	3
Major Event Rate	This includes all safety and security major events as defined by NTD, divided by VRM.	0.00003
Collision Rate	This includes all collisions reported to NTD, divided by VRM.	0
Pedestrian Collision Rate	This includes all collisions "with a person", as defined by NTD, divided by VRM.	0
Vehicular Collision Rate	This includes all collisions "with a motor vehicle", as defined by NTD, divided by VRM.	0
Fatalities	This includes all fatalities as defined by NTD.	0
Fatality Rate	This includes all fatalities as defined by NTD, divided by VRM.	0
Transit Worker Fatality Rate	This includes all transit worker fatalities as defined by NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.	0
Injuries	This includes all injuries as defined by NTD.	30

Injury Rate	This includes all injuries as defined by NTD, divided by VRM.	0.0003
Transit Worker Injury Rate	This includes all transit worker injuries as defined by NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.	0.00015
Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD.	1
Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD, divided by VRM.	0.00001
System Reliability	This includes Major Mechanical System failures as defined by NTD.	102,083

DTS is also a party to the Oahu Metropolitan Planning Organization and the DTS CSSO shares the safety performance targets and data with the Oahu Metropolitan Planning Organization and all other local, state and federal organizations upon request. Through the Oahu Metropolitan Planning Organization, DTS coordinates with HDOT and other applicable agencies to align safety performance targets for Skyline.

7.4.2 Risk Reduction Performance Targets

In addition, the SSSC is required to establish risk reduction performance targets using a 3-year rolling average of the data submitted to NTD in accordance with the Bipartisan Infrastructure Law Revisions to 49 USC Section 5329(d) and 49 CFR 673.19(d)(2) to address the eight (8) measures as identified in the FTA’s National Public Transportation Safety Plan, Version 2 dated April 2024. The current risk reduction performance targets are based on a rolling average from the start of revenue service through the end of calendar year 2024.

Table 5. 2025 Risk Reduction Performance Targets

Required Safety Risk Reduction Program Measure	Description	Target
Major Events	This includes all safety and security major events as defined by NTD.	3
Major Event Rate	This includes all safety and security major events as defined by NTD, divided by VRM.	0.00003
Collisions	This includes all collisions reported to NTD.	0
Collision Rate	This includes all collisions reported to NTD, divided by VRM.	0
Injuries	This includes all injuries as defined by NTD.	35
Injury Rate	This includes all injuries as defined by NTD, divided by VRM.	0.00035
Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD.	0
Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD, divided by VRM.	0

As a safety set aside, DTS allocates not less than 0.75 percent of FTA 5307 assistance funds to safety-related projects eligible under that FTA section.

In the event the risk reduction performance targets established as described above are not met, DTS will allocate the safety set aside funds in the following fiscal year to eligible projects including modifications to rolling stock and de-escalation training.

7.4.3 HDOT-Required Safety Performance Measures for Fully Automated Operation

In addition to the safety performance measures established by the FTA, HDOT further requires tracking performance measures and targets of specific relevance to fully automated systems.

Table 6. 2025 Targets for HDOT-Required Safety Performance Measures for Fully Automated Operation

HDOT-Required Safety Performance Measure for Fully Automated Operation	Description	Target
Right-of-Way Incursions by Manually-Operated Trains	This includes all instances of incursions by manually-operated trains entering the right-of-way without authorization.	0 Instance Annually
Movement Authority Violations	Occurrences where trains exceed their authorized movement limits.	2 Instances Annually
Loss of Train Indication	Situations where the system fails to detect the presence or location of a train.	6 Instances Annually
Number of Instances Rail Transit Vehicles Operated in Manual Mode due to Failure to Automated Modes	The count of times rail transit vehicles had to be manually operated because of a failure in the automated system.	3 Instances Annually
Stops Between Stations	Instances where trains stop unexpectedly between stations.	6 Instances Annually

Uncommanded Stops	Occurrences where trains stop without a command from the control system, indicating possible system malfunctions.	12 Instances Annually
Deployment of Technicians to Rescue Trains	The number of times maintenance technicians are sent to address issues with trains that are unable to continue in automatic mode.	3 Instances Annually
Intrusion Detection System Alerts	Alerts generated by systems designed to detect unauthorized access or intrusions into the rail system's operational areas.	TBD
Passenger Screen Gate Performance Metrics	Measures related to the performance of screen gates that ensure passenger safety by preventing access to tracks when trains are approaching or departing.	20 Failures Annually

7.5 Safety-Related Facility and Equipment Inspections and Audits

The maintenance regime is broadly separated into two types of maintenance: Preventive and Corrective Maintenance. Preventive maintenance is aimed at minimizing the frequency and ideally eliminating the potential occurrence of events, which may affect the overall System Service Availability and Reliability.

Corrective maintenance is aimed at rectifying issues or faults, which currently are affecting the System Service Availability and Reliability.

Safety-related facilities and equipment subject to the maintenance program include, but are not limited to:

- Rolling Stock (including MOW and service vehicles, train exterior, train interior, emergency drive consoles, etc.)
- Traction Power Sub-Stations and Gap Breaker Stations
- 3rd rail and running rail
- Power Distribution Systems
- ROC and Stations and all related equipment (platform screen gates, fare vending equipment and gates, vehicle lifts, cranes, fall arrest systems, etc.)
- Guideway
- Train Control System/ Automatic Train Control (ATC) and Supervisory Control and Data Acquisition (SCADA)

- Communications
- Other office buildings or structures used

7.5.1 Inspections

LOMC-CSC performs preventive maintenance at pre-determined intervals based on Maintenance Plans and OEM specifications. The Maintenance Management Information System (MMIS) automatically creates appropriate checklists. All maintenance actions and system data are recorded in the MMIS. This enables monitoring of the reliability, availability, maintainability, and security of the system and sub-system equipment.

The LOMC-CSC informs the DTS CSSO of any hazardous conditions identified during maintenance activities and inspections. Identified hazardous conditions are entered into the HTL and reported to HDOT by the DTS CSSO, as appropriate (refer to the HDOT PSP, Revision 8, Section 3.4.4, Notification of Unacceptable Safety Risks, and Section 3.4.5, Safety Event Tracking Log).

7.5.2 Audits

All LOMCs must notify DTS in advance of all non-proprietary audits and provide schedules, as well as subsequent findings and reports. In the case of LOMC-CSC, the audit types are defined in the applicable CFRs and Table 1 of HNL-09481 HSE Internal Auditing Program, which lists the following categories:

- Environmental (40 CFR)
- Health and Safety (Occupational) (29 CFR 1910 & 1926 as applicable)
- FTA SMS Compliance (49 CFR 671, 672, 673 & 674)

DTS reserves the right to attend any non-proprietary LOMC audits.

Oversight audits of safety-related facilities and equipment are conducted by DTS as part of the DTS Internal Safety and Security Audit Program to assess the proper implementation of the LOMC maintenance programs. In case of non-compliances, the LOMC would be required to prepare a CAP to remedy non-compliance findings, to be reviewed and approved by DTS and HDOT. The LOMC will provide CAP updates on a monthly basis at the SSEIC meetings until closure.

7.6 Safety-Related Procurement Process and Procedures

This section provides an overview of the PPWs in place to ensure safety principles and requirements are included in the LOMC procurement process.

Procurement of materials, products, systems and services for Skyline is the responsibility of each LOMC, with DTS oversight, to support the procurement process. Each LOMC is responsible for establishing procurement procedures reviewed and accepted by the DTS SSO.

As a part of the LOMC-CSC procurement process, Contract Documents issued to Contractors contain basic safety principles and requirements. This is in addition to functional, performance and other requirements, which apply to various materials, products, systems and services.

Qualified Contractors' proposed solutions are evaluated for compliance with safety principles and safety requirements prior to award of contractors.

The procurement controls of spare and replacement parts and O&M materials are in place to ensure:

- Items documented in the Configuration Management and/or MMIS are procured from approved suppliers for replacement and/or repair of failed items.
- Consumable materials and supplies, including hazardous materials, are procured from approved Suppliers/Vendors in accordance with applicable specifications and proper documentation.

7.6.1 Coordination with Hazard Management Process

The LOMC-CSC procurement process links to the Hazard Management process through the application of hazard analyses, risk acceptability criteria, and other processes as described elsewhere in this Plan.

The DTS CSSO reviews the relevant procurement packages to ensure the following safety and security requirements are met:

- Safety and security analyses are performed as required.
- Hazardous materials requirements are met including submission of safety data sheets (SDS).
- Roadway worker protection requirements are clearly stated within the procurement documents.
- All required employee training is conducted before implementation.

- All affected policies, rules, procedures, and work instructions are updated and implemented.

The procurement process shall not waive any safety requirements for materials, products, systems or services without the written approval from DTS through the MOC process.

7.7 Event Notification, Investigation, and Reporting

This section describes the processes used by DTS and LOMC-CSC for event notification, investigation, and reporting to the appropriate agencies.

7.7.1 Event Notification Procedures

7.7.1.1 Internal Notification Procedure

All events on Skyline are reported to OCC, and the LOMC-CSC OCC Supervisor ensures the info is recorded in the OCC Log. All LOMCs and other contractors receive these procedures during initial SMS training. LOMC-CSC leads investigations for all reported events on Skyline. Events brought to the attention of any other control room staff must be reported by them to the LOMC-CSC OCC Supervisor. The LOMC-CSC director on-call notifies the LOMC-CSC O&M Railway Safety Manager, Project Security Manager, or HSE Manager, depending on the event, of any event as soon as possible but no longer than one-hour and ensure the Everbridge emergency notification system has been used to message the info to stakeholders, as described in HNL-09023.

Safety Events as defined by 49 CFR 674.33 Definitions: Refer to Section 7.7.1.2, External Notification Procedure.

Other Events that do not meet 49 CFR 674.33 Definitions: LOMC-CSC is responsible for sending out an Everbridge notification to DTS with the information per the event notification process as described in HNL-09023 Event Notification, Reporting and Investigation Plan for all Other Events that do not meet 49 CFR 674 definitions. Refer to HNL-09302 Everbridge (Unified Mass Communication) Work Instruction for the complete list of events.

LOMC-CSC is responsible for recording and maintaining data for Safety Events and Other Events. The LOMC-CSC O&M Railway Safety Manager, Project Security Manager, and HSE Manager collect and track safety and security data to reduce the likelihood of recurrence and in compliance with SMS. The DTS CSSO is responsible for providing safety and security data to HDOT and/or FTA when requested.

HNL-09023 and HNL-09302 are reviewed (and updated as needed but no less than annually) by the LOMC-CSC and reviewed and accepted by DTS.

DTS audits the LOMC-CSC Event Notification and Reporting Procedure as part of the DTS Internal Safety and Security Audit Program.

7.7.1.2 External Notification Procedure

Reportable events to NTSB, FTA, and HDOT are reported immediately to the LOMC-CSC O&M Railway Safety Manager, Project Security Manager, or HSE Manager, who are required to notify the DTS CSSO telephonically within one-hour of awareness.

External notification is accomplished by the DTS CSSO by telephone, informing NTSB, FTA, and HDOT.

Safety Events (Two-Hour Notification): LOMC-CSC is responsible for sending out an Everbridge notification to DTS and HDOT with the information per the Safety Event notification process as part of the 49 CFR 674.33 two-hour notification requirement. The DTS CSSO notifies the FTA via phone thru the U.S. Department of Transportation's Transportation Operations Center (1-202-366-1863). The DTS CSSO also notifies the NTSB with a call to the National Response Center (1-800-424-0201).

Safety Event notification is required for the following event types:

- Fatality
- Two or more injuries
- Derailment (in the yard or mainline)
- Collision resulting in one or more injuries
- Collision between two rail transit vehicles
- Collision resulting in disabling damage to a rail transit vehicle
- Evacuation for life safety reasons
- Unintended train movement

The two-hour notification requirement excludes criminal actions that result in fatalities or injuries, such as homicides and assaults.

In accordance with the FTA Two-Hour Safety Event Notification Guide, when a Safety Event includes multiple Safety Event types, the classification type shall be the Safety Event that occurred first.

Trespass Events at the ROC (Two-Hour Notification): In addition to the above external notification requirements, LOMC-CSC is responsible for sending out an Everbridge notification to DTS and HDOT within 2 hours of awareness of a trespass event at the ROC, as required by HDOT.

7.7.2 Event Investigation Procedures

Investigations of safety events are conducted to identify causal factors. LOMC-CSC is responsible for investigating any events that require notification to DTS. LOMC-CSC is required to review (and update as needed) the HNL-09023 Event Notification, Reporting, and Investigation Plan. DTS audits HNL-09023 as part of the DTS Internal Safety and Security Audit Program. In the event there is a conflict of interest, DTS would conduct an independent investigation.

All personnel and contractors that conduct investigations must be trained to perform their functions in accordance with the Public Transportation Safety Certification Training Program (PTSCTP).

The FTA may conduct an independent investigation of any Safety Event or an independent review of HDOT's or DTS' findings of causation of a Safety Event.

7.7.2.1 Investigation Reports

Within 48 hours of a reportable event, LOMC-CSC must submit to the DTS CSSO a preliminary report which includes initial findings of fact; any preliminary probable cause; investigation plans; FTA or NTSB involvement in the investigation; and whether an ad-hoc investigation committee will be convened.

A final investigation report, including a description of investigation activities, findings, identified causal factors, and CAPs (if required), must be submitted to the DTS CSSO within 21 days of the event, in a format approved by DTS. The DTS CSSO must submit the final investigation report within 30 days of the Safety Event to HDOT unless granted an extension in writing.

Until the investigation is completed, the LOMC-CSC O&M Railway Safety Manager is responsible for preparing and submitting a monthly status investigation report. The status report at a minimum will include:

- Minutes of any meetings held by the ad-hoc investigation committee;
- Disclosure of immediate actions LOMC-CSC has taken, planned, or completed;
- Principal issues or items currently being evaluated; and

- Overall progress and status of the investigation.

The LOMC-CSC is responsible for filing all event documentation in the system of record.

7.7.2.2 Coordination with HDOT

The DTS CSSO is the primary point of contact to HDOT for Safety Event issues. All materials (audio/video files and relevant logs), which may be useful for investigation purposes and any other items relevant for clarification will be provided.

7.7.3 National Transit Database (NTD) Reporting

DTS is responsible for reporting to the FTA's NTD per the requirements set forth in Title 49 U.S.C. Section 5335. DTS has an existing agency profile as an Urban Reporter and provides NTD reports to FTA for both rail and non-rail transit services. The DTS CSSO who is responsible for submitting the NTD reports to the FTA is required to complete the appropriate NTD training for accurate and compliant reporting.

LOMC-CSC is responsible for collecting transit-related safety data, as required, and provides monthly reports (stored in the MMIS system) to DTS. The DTS CSSO is accountable for the accurate and timely submission of the required monthly and annual NTD reports.

In the event of a safety event, which meets a Major Event reportable threshold, LOMC-CSC is required to report to the DTS CSSO within 2 hours. The DTS CSSO is accountable for the submission of Major Event Reports no later than 30 days after the date of the event.

7.7.3.1 NTD Safety Reports (Rail)

DTS submits transit-related safety data and reportable events, which meet NTD reporting thresholds. The following sections summarize the NTD safety reporting requirements.

7.7.3.2 Chief Executive Officer Certification (S&S-20)

The DTS CSSO ensure submission of an annual Safety & Security Chief Executive Officer Certification (S&S-20). The S&S-20 serves as DTS' confirmation that all the S&S data submitted is accurate for the previous calendar year. The DTS CSSO must ensure submission of the S&S-20 for the previous calendar year by the end of February of each year.

The S&S-20 automatically tallies the number of events, injuries, and fatalities DTS reports across Major Event reporting forms. It also includes the number of events, injuries, fires, and assaults on transit workers on the Non-Major Summary form. It only tallies submitted reports, which have submission dates; reports, which have only been saved (and thus have no submission dates) are not included.

7.7.3.3 Major Event Report (S&S-40) (Safety Events)

The Major Event Report (S&S-40) captures detailed information on severe S&S events that occur within a transit environment. DTS is required to complete one S&S-40 per reportable event, regardless of how many thresholds an event meets. The S&S-40 is due no later than 30 days after the date of the event.

A reportable event is one that meets any NTD reporting threshold and:

- Occurs at a transit revenue facility, maintenance facility, or rail yard;
- Occurs on transit right-of-way or infrastructure (the underlying framework or structures that support a public transportation system);
- Occurs during a transit-related maintenance activity; or
- Involves a transit revenue vehicle.

This event reporting requirement does not include:

- Events that occur off transit property where affected persons, vehicles, or objects come to rest on transit property after the event;
- Occupational safety events occurring in administrative buildings;
- Events that occur during the engineering or construction phases of a new rail transit system or the extension of an existing rail transit system, unless they involve transit-related activities such as operations, testing, simulated service, pre-revenue service, or a transit-related maintenance activity;
- Deaths that are confirmed to be a result of illness, drug overdose or other natural causes, outside of a reportable event (deaths of undetermined causes in a rail right of way that may be the result of collision or electrocution are reportable);
- Collisions that occur while transit personnel are travelling to or from a transit-related maintenance activity; and
- Collisions involving a supervisor car or other non-revenue transit service vehicle operating on public roads.

Reportable major safety events include, but are not limited to:

- Collisions
- Fires (suppression)

- Derailments (mainline and yard) including non-revenue vehicles
- Unintended Train Movement
- Hazardous Material Spills
- Acts of God
- Other Safety Events (events, which do not fall into any of the other categories, yet meet a reporting threshold *other than* immediate transport for medical attention for one person)

Threshold for automatic reportable major events include:

- Fatality (includes suicide)
- One or more persons immediately transported for medical attention (injury) or serious injury
- Substantial damage
- Evacuations of a transit facility or vehicle for life safety reasons or to the rail right-of-way (excluding evacuation to a platform, except for life safety), including both transit-directed and self-evacuations

Automatically reportable – no other threshold:

- Reporting of all mainline/yard derailments
- Rail transit vehicle collisions occurring at a grade-crossing
- Rail transit vehicle collisions with an individual (regardless of injury)
- Rail transit vehicle collisions with another revenue or non-revenue rail transit-vehicle
    - Including maintenance/hi-rail vehicles
- Incidents involving unintended train movement

7.7.3.4 S&S-50: Non-Major Monthly Summary Report

The Non-Major Monthly Summary Report (S&S-50) captures monthly summary information on minor fires, other less severe single-injury safety events, and assaults on a transit worker that are not reportable as Major Events.

DTS is required to submit one S&S-50 each month regardless of whether they have data to report, or if an S&S-40 has been submitted during the month. All events resulting in two or more injuries are reported as a Major Event. The S&S-50 report is due prior to the last day of the following month.

The Non-Major Monthly Summary Report has two event type categories: Other Safety Incidents and Number of Non-Major Fires.

DTS must report the number of Other Safety Incidents, which are **not** collisions, fires, derailments, acts of God, hazardous material spills, or security events, but do result in a person being immediately transported from the scene for medical treatment, including transport by personal vehicle.

A reportable Other Safety Incident is one, which meets the single injury NTD reporting threshold and occurs

- on transit right-of-way or infrastructure (the underlying framework or structure, which support a public transportation system),
- at a transit revenue facility,
- at a maintenance facility or rail yard,
- during a transit-related maintenance activity, or
- Involves a transit revenue vehicle.

DTS must report the number of non-major fire events, which require suppression, but do not meet a major event reporting threshold, by location.

A reportable non-major fire is one that occurs

- 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
- On or in a transit revenue vehicle.

7.8 Safety Committees

Pursuant to BIL revisions to 49 USC Section 5329(d), the primary safety committee for Skyline is the SSSC. Other Skyline safety and security committees include the ESSC and the SSEIC. These committees are responsible for overseeing the safety and security of the system during revenue service and are made up of voting members from DTS and LOMC-CSC and non-voting members from other LOMCs.

The SSSC meets on a quarterly basis and is tasked with maintaining oversight and provide direction on system safety and security performance, hazards, and risk management. The SSSC is responsible for reviewing and approving revisions to the ASP. The SSSC is convened by a joint labor-management process and is attended by an equal number of frontline transit worker representatives and management representatives from DTS and LOMC-CSC. In addition, other LOMCs are invited to attend the SSSC meetings as a non-voting member. The SSSC identifies and recommends risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment; identifies mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and identifies safety deficiencies for purposes of continuous improvement. Voting members must meet the following minimum training requirements to ensure the SSSC is qualified to identify safety deficiencies for purposes of continuous improvement responsibilities:

- S-71 O&M Rulebook provided by LOMC-CSC
- DTS-provided SMS course or S-20E SMS course provided by LOMC-CSC

See DTS SSO-00001 Safety Committee Charter for details on the SSSC committee structure.

The ESSC meets on a monthly basis and is tasked with maintaining oversight and provide direction on emergency and security systems to include response performance, planning, and management. The ESSC strives to control emergency and security risks, resolves emergency and security problems, and shares and analyzes emergency and security data. The ESSC shares the outcomes of emergency and security events to include the status of corrective actions and/or mitigations and is responsible for liaison with emergency responders.

The SSEIC meets on a monthly basis and is tasked with sharing the outcomes of event investigations, status of corrective actions and/or mitigations, as well as applicable statistics. The SSEIC strives to control safety risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully. The SSEIC maintains the Event Log, CAP Log, and Hazard Tracking Log.

7.9 Internal Safety and Security Audit Program

DTS SSO conducts internal safety and security audits. DTS SSO-00002 Internal Audit Program Plan (IAPP) explains the responsibilities, audit processes and approach, and the process used to ensure planned and scheduled internal safety and security reviews are performed to evaluate compliance with the ASP and SSP. In the event DTS or HDOT deems an update to the DTS IAPP necessary, the DTS CSSO will submit the revised plan and all referenced materials to HDOT for review and approval.

The DTS CSSO ensures the auditor for each audit element is independent of that element.

7.9.1 Audit Process

Internal safety and security audits cover each section of the ASP and SSP over a three-year period. The DTS CSSO takes the lead in creating a schedule on which ASP and SSP components and sections are to be covered each year. Checklists are used in the audit, and the CSSO transmits audit reports along with corrective action plans to HDOT. DTS notifies HDOT at least 30 days in advance of each internal audit and shares documentation such as checklists used or open corrective actions.

DTS notifies the LOMCs to be audited at least 30 days in advance of each internal audit and shares relevant audit checklists.

7.9.2 Annual Audit Report

DTS submits, by February 1 of each year, an Annual Audit Report to HDOT, which documents the internal audits conducted in the previous year, including any corrective action plans. The report is accompanied by the formal Letter of Certification signed by the Accountable Executive that DTS is in compliance with its ASP.

7.9.3 Audit Reporting

For each audit conducted, audit reporting consists of Audit Findings categorized on severity of the non-compliance. These could be listed as ‘Findings’ or ‘Observations with Recommendations’. Each ‘Finding of Non-Compliance’ has a CAP associated with it. Observations do not require formal CAPs, but the recommendations are still recorded and tracked. The implementation status of these activities is monitored by the CSSO and are documented and tracked as part of the Skyline CAP Log.

7.9.4 Roadway Worker Protection Compliance Monitoring Program

In addition to field inspections and observations, DTS conducts annual audits of the LOMC-CSC Roadway Worker Protection (RWP) Program as part of its RWP compliance monitoring program, per 49 CFR Part 671.43 requirements. RWP Program audits are performed following the internal audit processes as described in the DTS IAPP.

The DTS CSSO provides quarterly reports to HDOT documenting DTS' compliance with and sufficiency of the Skyline RWP Program. In addition, the DTS CSSO provides an annual briefing to the DTS Director (Accountable Executive) and City Council regarding the performance of the Skyline RWP Program and any identified deficiencies requiring corrective action.

7.9.5 Three-Year Audit Schedule

Refer to Table 7 for the DTS Internal Safety and Security Audit Program three-year audit schedule through June 30, 2028.

Table 7. DTS Internal Safety and Security Audit Program Three-Year Audit Schedule

Audit Cycle	Agency Safety Plan (ASP)	System Security Plan (SSP)
FY26 (7/1/2025 – 6/30/2026)	• **Q1: Safety Assurance III (8/2025)** ○ Safety Data Acquisition, Collection and Analysis ○ Continuous Improvement ○ Safety Committees ○ Internal Safety & Security Audit Program ○ Safety Plan Documentation • **Q2: RWP Program Audit (11/2025)** • **Q3: Safety Promotion (2/2026)** ○ Training and Qualification ○ Safety Communications ○ Hazardous Materials Program ○ *Drug and Alcohol** ○ *Emergency Management Program** • **Q4: Safety Assurance IV (5/2026)** ○ Rules Compliance ○ Management of Change ○ Safety-Related Procurement Process and Procedures	
FY27 (7/1/2026 – 6/30/2027)	• **Q1: Safety Management Policy (8/2026)** ○ Policy Statement ○ ASP Policies ○ Goals and Objectives ○ Management Structure and Organization ○ ASP Implementation • **Q2: RWP Program Audit (11/2026)** • **Q4: Safety Assurance I (5/2027)** ○ Safety-Related Facility and Equipment Inspections and Audits ○ Event Notification, Investigation and Reporting	• **Q3: System Security Plan I (2/2027)** ○ System Security ○ SSP Management Activities • **Q3: System Security Plan II (2/2027)** ○ SSP Description
FY28 (7/1/2027 – 6/30/2028)	• **Q1: Safety Risk Management (8/2027)** ○ Safety Hazard Identification Process ○ Safety Risk Assessment Process ○ Safety Risk Mitigation Process ○ Transit Operations Safety Risk Reduction Program • **Q2: RWP Program Audit (11/2027)**	• **Q3: System Security Plan III (2/2028)** ○ Threat and Vulnerability • **Q4: System Security Plan IV (5/2028)** ○ Implementation and Evaluation of SSP ○ Modification of SSP

**Drug and Alcohol and Emergency Management Program will be audited as part of the Safety Promotion Audit beginning with the next three-year cycle.*

7.10 Safety Plan Documentation

DTS must maintain documents which establish its ASP, including those related to the implementation of its SMS, and results from SMS processes and activities. DTS must maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that DTS uses to carry out its ASP. The FTA, other federal agencies and the HDOT SSOA will have access to review all SMS documentation upon request. DTS maintains these documents for a minimum of three years after they are created, in accordance with 49 CFR 673.31.

8 COMPONENT 4 – SAFETY PROMOTION

Safety Promotion provides visibility of executive management's commitment to safety and fosters improved safety performance by increasing safety awareness through safety communication and training. Through communication of lessons learned and broader safety information, employees and contractors are made aware of safety priorities and safety concerns at both the organizational level and as they relate to their own duties and responsibilities.

All LOMCs, with DTS oversight, establish and perform the following:

- **Comprehensive Safety Training Program:** Comprehensive safety training program for all employees and contractors directly responsible for safety.
- **Safety Communications:** Approach for communicating safety performance throughout the organization.
- **Emergency Management Program:** Only the LOMC-CSC and LOMC-L2S is required to maintain a current Emergency Management Program with annual reviews and updates and coordinate with emergency responders as needed. However, all LOMC-CSC training courses cover normal, abnormal, and emergency situations and all LOMCs performing work on Skyline are required to adhere to the LOMC-CSC Emergency Management Plan.
- **Drug and Alcohol Program:** LOMC-CSC ensures their organization is committed to maintaining a drug-free workplace to promote both the quality of its services and the safety of its employees, customers, and the public. Ensure all covered employees are required to submit to drug and alcohol tests in accordance with 49 CFR Part 655. Ensure all FTA drug and alcohol testing is conducted in accordance with 49 CFR Part 40, as amended.
- **Hazardous Materials Program:** Ensure the hazardous materials program is implemented as it relates to materials purchased, handled, stored, and disposed of. Ensure the hazardous materials process is in compliance with federal, state and local regulations.

8.1 Training and Qualification

One of the key elements of safety promotion is to implement an effective training program which ensures staff are best prepared to safely operate and maintain the system. The process of building and maintaining up-to-date training programs is based on:

- Identifying required competencies
- Training material requirements
- Testing Requirements
- Evaluation of performed training (passing level, satisfaction etc.)

- Re-training requirements
- Documentation
- Requirements for certifications.

LOMCs are responsible for preparing a comprehensive training and qualification program plan for review and approval by DTS. All individuals trained may request copies of their own training records.

LOMC-CSC develops and maintains training programs that cover minimum safety and security requirements for all LOMCs, including but not limited to de-escalation training. The LOMC-CSC training program includes both an initial training program for new employees, and an annual re-training program to maintain competency of staff on revised procedures. In addition, all LOMCs are required to provide their own task-specific training to their employees.

LOMC-CSC determines the minimum required test scores required to pass each course and recertification requirements, along with the requirements of the trainers. Training materials specific to safety and security are reviewed by the DTS CSSO with documents maintained through the configuration management system.

8.1.1 LOMC Employee Safety

All new Skyline employees will receive basic health and safety training based on individual LOMC training matrices prior to receiving the in-depth system specific training courses developed in partnership between LOMC-CSC and the system suppliers applicable to the particular job function.

8.1.2 Third Party Contractor Safety

Familiarization training for DTS, HDOT, and outside contractor personnel consist of S-71 O&M Rulebook and S-20E SMS courses provided by LOMC-CSC. The DTS SMS course can be taken in lieu of S-20E.

Roadway Worker Protection Training must be given to all contractor personnel prior to working on or around the right-of-way.

LOMC-CSC assisted HFD with the development of a familiarization training course used exclusively by First Responders. HFD presents this course to all new First Responders whose job duties may include responding to Skyline events.

8.1.3 Recordkeeping

During the entire lifecycle of the system all information related to training administered through the LOMC-CSC LMS is stored and managed by the LOMC-CSC. The Training and Competency Manager is responsible for the development and updating of safety related training courses, other courses, training materials and examination material and records. Such records are made available for DTS to audit when requested.

8.1.4 Compliance with Training Requirement

DTS will confirm compliance with training requirements of LOMC staff through regular inspections and the DTS Safety and Security Audit Program.

8.1.5 Testing of Operations & Maintenance Personnel

DTS, LOMC-CSC, and LOMC-L2S supervisory personnel perform spot checks on employees to verify their knowledge of safety-critical responsibilities and proper failure management. For LOMC-CSC employees, the results of each test are quantified, and a test score is recorded and entered in the employee's training record. For LOMC-L2S employees who fail the spot check, a corrective action shall be developed. Corrective action will include retraining. Where tests indicate a lack of proficiency on the part of the employee tested, the employee is provided with additional training and instruction. Such records are made available for DTS to audit when requested.

DTS performs inspections, if non-compliant, DTS advises the LOMC and at selected intervals performs follow-up inspections, or the LOMC advises DTS of remedial actions taken.

8.1.6 ASP Implementation Training Requirements

The DTS CSSO is responsible for identifying positions within the organization directly responsible for safety oversight. Specifically, DTS and LOMC-CSC staff directly responsible for the implementation of the ASP shall meet the PTSCTP requirements of 49 CFR Part 672. Identified staff are required to complete the following courses over a three-year period:

- TSSP Curriculum (minus Transit System Security (TSS) course) (credit will be provided if participant has a Course Completion Certificate of previously taken TSSP courses)
    - Transit Rail System Safety (36 hours)
    - Transit Rail Incident Investigation (36 hours)
    - Effectively Managing Transit Emergencies (32 hours)
- SMS Curriculum
    - SMS Awareness (1 hour)

  - Safety Assurance (2 hours)
  - SMS Principles for Transit (20 hours)
- DTS or LOMC-CSC SMS course (2 hours)

The DTS CSSO is the designated single point of contact for communication with FTA regarding PTSCTP information. The DTS CSSO serves as a liaison to inform FTA of changes in designated personnel participating in the PTSCTP, enroll new participants, submit proof of recertification for designated personnel, and address any other program documentation or communication needs.

Biennial refresher training is required for all personnel with this certification, which includes the following courses:

- O&M Rulebook
- Roadway Worker Protection
- SMS course (DTS or LOMC-CSC version)

8.2 Safety Communications

LOMCs are committed to an environment with open and honest communication, in which employees are encouraged to submit reports relating to safety and hazardous conditions. To support the open communication policy, LOMC-CSC maintains the right-to-know program and unsafe and unhealthy condition-reporting program. In addition, all employees and contractors complete:

- Training on SMS and their role in the hazard management process (e.g., hazard identification and reporting)
- Training on the risk management program including assigning hazard severity and probability
- Emergency numbers on their badges to be able to report something if they see something, or they will call 9-1-1 in case of a real emergency.

LOMC-CSC is responsible for establishing protocols for communicating safety information to all employees throughout the system. LOMC-CSC utilizes safety and security bulletins to distribute Safety Communications. DTS uses committees and emails to distribute Safety Communications.

8.2.1 Lessons Learned Programs

LOMC-CSC established a Lessons Learned Program, which is reviewed and approved by DTS. The lessons learned include creating and maintaining a list of lessons learned, which has significant findings, recommendations, and new insights realized. LOMC-CSC in coordination with DTS evaluates the Lessons Learned Program to identify ad-hoc and as-needed training or familiarization programs to ensure lessons learned are used for continuous improvement. Information for the Lessons Learned come from hazard reporting, QR code submissions, Event Investigations and audits/inspections. Lessons Learned are evaluated and communicated through the SSEIC.

The LOMC-CSC uses Safety Bulletins to transmit this information to employees, subcontractors, other LOMCs and DTS.

8.3 Emergency Management Program

The overall responsibility of the DTS emergency management program is overseen by the DTS CSSO. In the event of an emergency, the DTS SSO serves in the following capacity:

- Assists with the coordination with the LOMC-CSC O&M Railway Safety Manager, LOMC-CSC Project Security Manager, and LOMC-CSC HSE Manager, Joint Traffic Management Center, Honolulu Department of Emergency Management, HPD, HFD and Emergency Medical Services, as needed.
- Inform the DTS Director (Accountable Executive) and the CSSO of updates to emergency management activities and conditions.
- Manages LOMC-L2S.

The following sections provide further details on how the CCH's Comprehensive Emergency Management Plan and the LOMC-CSC Emergency Management Plan provides emergency preparedness and management for Skyline.

8.3.1 Comprehensive Emergency Management Plan

The CCH maintains a Comprehensive Emergency Management Plan (CEMP). The CCH's plan includes procedures for natural as well as manmade disasters such as hurricanes, tsunamis, earthquakes, pandemics, terrorist attacks, bomb threats, etc. The plan also identifies essential employees and lists the responsibilities and obligations for each.

8.3.2 Skyline Emergency Management Plan

The LOMC-CSC Emergency Management Plan (EMP) includes emergency management of all events on or affecting Skyline infrastructure or premises. The LOMC-CSC EMP is intended to prevent and mitigate, prepare for, respond to, and recover from emergencies. These activities are aligned to but separate from crisis management activities. All management, employees, contractors, and other individuals working for or on Skyline shall comply with the LOMC-CSC EMP and procedures to ensure emergencies are managed uniformly, appropriately and swiftly while minimizing the impact of the emergency to the greatest extent possible.

LOMC-CSC is committed to the environment, health and safety of its employees, contractors, customers, the public, and all who are affected by its operations. Implementation of sound emergency management procedures and principles are fundamental to achieving this commitment.

The LOMC-CSC EMP defines the strategic framework and references the standard processes for managing responses to emergencies.

The key elements to emergency management are:

- Prevention and mitigation (identifying, assessing, and managing risk),
- Emergency preparedness (preparing plans, training, setting up communication networks, identifying roles and responsibilities, call out rosters, exercise and drills),
- Emergency response (systematic, uniform and organized approach to responding to an emergency, including allocation of resources and external agency interaction, where applicable), and
- Recovery and service restoration (getting the business back to normal, post incident review, lessons learned, returning to normal operations).

The DTS SSO is responsible for overseeing and ensuring tabletop exercises and full-scale exercises are conducted annually by LOMC-CSC.

The LOMC-CSC is responsible for coordinating and planning emergency response with external agencies such as the HFD, HPD, Honolulu Emergency Medical Services, and the Honolulu Department of Emergency Management in coordination with DTS.

Pursuant to BIL Revisions to 49 USC 5329(d), DTS and LOMC-CSC have identified and implemented the following strategies, consistent with guidelines of the Centers for Disease Control and Prevention (CDC) and Hawaii State Department of Health, to minimize exposure of the public and personnel to infectious diseases:

- Enhanced cleaning protocols

- Health screening and monitoring
- PPE
- Social distancing measures
- Communication and education, including clear signage
- Ventilation improvements
- Collaboration with health authorities
- Emergency response plans

8.4 Drug and Alcohol

This section highlights the policies and procedures dealing with drug and alcohol abuse anywhere on the Skyline property during its operation & maintenance.

8.4.1 Drug and Alcohol Program

The DTS CSSO is responsible for oversight of the Skyline Drug and Alcohol program per 49 CFR Part 40 and Part 655.

The CCH's Drug and Alcohol Policy is applicable to DTS employees.

8.4.2 LOMC-CSC Drug and Alcohol Program

The LOMC-CSC HR Manager has the overall responsibility to ensure the implementation and effectiveness of the LOMC-CSC Drug and Alcohol program.

LOMC-CSC is responsible for establishing drug and alcohol policies and procedures reviewed and accepted by DTS.

The LOMC-CSC Drug and Alcohol policy states LOMC-CSC will:

- Prohibit the unlawful manufacture, distribution, dispensing, possession, or use of controlled substances;
- Ensure employees are not impaired in their ability to perform assigned duties in a safe, productive, and healthy manner;
- Create a workplace environment free from the adverse effects of drug and alcohol abuse or misuse; and

- Encourage employees to seek professional assistance when substance abuse adversely affects their ability to perform their assigned duties.

Each employee is provided a signed copy of the adopted policy.

All covered employees are required to submit to drug and alcohol tests as a condition of employment in accordance with 49 CFR Part 655.

All FTA drug and alcohol testing is conducted in accordance with 49 CFR Part 40, as amended. Circumstances for testing includes:

- Pre-Employment Testing
- Reasonable Suspicion Testing
- Post-Accident Testing
- Random Testing
- Return-to-Duty Testing

LOMC-CSC is required to review (and update as needed, at a minimum annually) the written LOMC-CSC Drug and Alcohol Program and its procedures. DTS audits the LOMC-CSC Drug and Alcohol Program as part of the DTS Internal Safety and Security Audit Program.

8.4.3 Over the Counter/Prescription Drugs & Fatigue Awareness

LOMC-CSC is responsible for conducting over the counter/prescription drug and fatigue awareness training for all LOMC-CSC Skyline employees (S-29E Fatigue Awareness and A-16E Over the Counter/Prescription Drugs).

8.4.4 Audits of Outside Agencies Responsible for Drug and Alcohol Testing

LOMC-CSC is responsible for audits of all outside agencies, which conduct drug and alcohol tests for LOMC-CSC. The audits follow the guidelines of FTA's Drug and Alcohol Program.

8.5 Hazardous Materials Program

This section provides a high-level description of the program, which deals with the use of hazardous materials. This program's purpose is to control the hazards to human health and to control the pollution to the environment (air, water and land) during the storage, handling/use, and disposal of hazardous materials.

LOMCs are responsible for implementing a Hazardous Materials program. DTS is responsible for reviewing, accepting, and conducting audits of the programs as part of the DTS Internal Safety and Security Audit Program.

Hazardous materials storage on Skyline and at stations is strictly prohibited.

8.5.1 Program Responsibility

LOMCs are responsible for implementing the Hazardous Materials program as it relates to materials purchased, handled, stored, and disposed of.

8.5.2 Hazardous Material Process

Hazardous Materials Process consists of:

- Identifying the Hazardous Materials, as classified by the U.S. Environmental Protection Agency and the applicable Hawaii State and Local (Honolulu) Regulations, which are used during the construction, operation & maintenance of Skyline, or stored on Skyline controlled by the LOMC-CSC.
- Obtaining Safety Data Sheets of Hazardous Materials and displaying/locating them at defined places for use by the employees.
- Employee training in:
    - Identification of the areas where the Hazardous Materials are stored or used
    - Location and availability of Safety Data Sheets
    - Safe handling and use of the Hazardous Materials
    - Required PPE when using specific hazardous materials
    - Understanding the Hazard Labels on the Hazardous Materials containers
    - Reporting and arranging for cleaning of spills of Hazardous Materials by authorized personnel.
    - Arranging for disposal of Hazardous Materials waste according to approved procedures
    - Notification of appropriate personnel regarding spills and other events