HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

No. 25-317

RESOLUTION

APPROVING THE DEPARTMENT OF TRANSPORTATION SERVICES' AGENCY BUS AND PARATRANSIT AGENCY SAFETY PLAN PURSUANT TO 49 CFR PART 673 AND FEDERAL TRANSIT ADMINISTRATION REQUIREMENTS.

WHEREAS, 49 Code of Federal Regulations Part 673, Public Transportation Agency Safety Plans, require public transportation agencies that 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 transit operations, including bus and paratransit services, which is compliant with Part 673; and

WHEREAS, by Resolution No. 20-152, FD1, adopted on July 8, 2020, in compliance with the PTASP requirement set forth in Part 673, the Honolulu City Council ("Council") approved DTS' Transit Agency Safety Plan for bus and paratransit operations; and

WHEREAS, DTS has prepared an updated Bus and Paratransit Agency Safety Plan for bus and paratransit 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 Bus and Paratransit Agency Safety Plan 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 safety plan for bus and paratransit operations; and

HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

No. 25-317

RESOLUTION

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

INTRODUCED BY:

Tommy Waterhouse (br)

DATE OF INTRODUCTION:

NOV 13 2025
Honolulu, Hawaii

Councilmembers

DTSTMDSAFETYPLAN.R25.1

Report Title:
Department of Transportation Services ("DTS"); Federal Transit Administration ("FTA"); Agency Bus and Paratransit Safety Plan; 49 Code of Federal Regulations ("CFR") Part 673; Public Transportation Agency Safety Plan ("PTASP"); 49 U.S. Code Chapter 53.

The summary description of legislation appearing on this page is for informational purposes only and is not legislation or evidence of legislative intent.

Exhibit A

DEPARTMENT OF TRANSPORTATION SERVICES

SAFETY AND SECURITY OFFICE

BUS AND PARATRANSIT AGENCY SAFETY PLAN

DOCUMENT ISSUE TABLE

POSITION	SIGNATURE	DATE
Verifier (Manager Safety Systems)		09/18/2025
Acknowledge (Interim Chief Safety and Security Officer, Consultant - Jacobs)		09/18/2025
Authorizer (Director of Transportation Services, Accountable Executive)		09/18/2025

CHANGE HISTORY

REVISION	DATE	SECTION(S)	DESCRIPTION	REVIEWER
01.00	06/01/2020	All	Initial Release	Director of Transportation Services, Chief Safety and Security Officer

CHANGE HISTORY

REVISION	DATE	SECTION(S)	DESCRIPTION	REVIEWER
02.00	09/18/2025	All	(1) Updates to comply with changes to 49 CFR Part 673 and revised FTA National Public Transportation Safety Plan. (2) Revisions to various sections to reflect current regulatory and operating conditions. (3) Document renamed to Bus and Paratransit Agency Safety Plan (BASP). (4) Document formatted into current agency plan template.	Director of Transportation Services, 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 OTS Labor Management Committee has reviewed the Bus and Paratransit Agency Safety Plan (ASP), Revision 02.00, dated September 18, 2025, in accordance with the requirements outlined in 49 CFR Part 673.

We affirm that the Bus and Paratransit ASP, Revision 02.00:

- 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 Bus and Paratransit 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 Bus and Paratransit ASP, Revision 02.00, for implementation effective November 4, 2025, at 1:00 pm Hawaiian Time, and authorizes its submission to the City Council for the City and County of Honolulu as evidence of compliance with 49 CFR Part 673.

By signing below, I hereby certify:

Jose A. Marquez

Jose A. Marquez
Interim DTS Chief Safety & Security Officer

November 4, 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 (O&M) of TheBus and TheHandi-Van systems and is committed to providing safe, reliable, and resilient service. This Bus and Paratransit Agency Safety Plan (BASP) 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 TheBus and TheHandi-Van systems. 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 O&M contractor Oahu Transit Services (OTS). Specifically, DTS and OTS shall:

- Develop a positive safety culture through the implementation of a comprehensive SMS program;
- Manage the risks associated with the O&M of the systems 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 Director of Transportation Services (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 BASP. OTS is responsible for implementing the safety programs discussed in this Plan, including but not limited to establishing a safety risk 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 OTS management, must guide the process of identifying, assessing, and resolving hazards. OTS is expected to cooperate fully with the DTS CSSO in this endeavor.

CCH requires all DTS and OTS employees to adhere to the BASP and its policies, safety performance targets (SPTs), and related plans, procedures, and work instructions (PPWs).

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 Honolulu City Council 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 BASP 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 SMS program to ensure the safe and secure operation of TheBus and TheHandi-Van systems. The BASP is developed in accordance with 49 CFR Parts 670 and 673 requirements, as mandated by the Federal Transit Administration (FTA). The BASP 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 BASP is specifically developed to:

- Establish the SMS program for TheBus and TheHandi-Van;
    - Establish a written statement of safety policy, which includes the agency safety objectives, an employee safety reporting program (ESRP), and organizational accountability and safety responsibilities for the Accountable Executive, CSSO (SMS Executive), agency leadership, and key staff responsible for safety and performing verification and validation 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 (MOC), 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 safety performance throughout the organization.
- Identify the relationships and responsibilities of 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 BASP describes the responsibilities and activities, which must be implemented and maintained to achieve the highest degree of safety in the operation of TheBus and TheHandi-Van. The BASP identifies safety activities intended to improve the coordination, cooperation, and communication of safety-related functions within and across DTS and OTS. This document is focused towards maximizing the safety of bus and paratransit customers, employees, contractors and all who are affected by the services. The BASP 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-DTS-C53257	City and County of Honolulu Public Transit Authority Management and Operations Agreement

1.3.2 Project Reference Documents

Document Code	Document Title
49 U.S.C. 5329(d)	Public Transportation Safety Program, Subpart D – Public Transportation Agency Safety Plan

Document Code	Document Title
SSO-00002	Internal Audit Program Plan
OTS	OTS Emergency Action Plan
OTS	Personnel Policy Manual
OTS	Instruction Department Standard Operating Procedures
OTS	Bus Operators General Operating Procedures
OTS	Field Operations Standard Operating Guidelines
OTS	Paratransit Maintenance General Operating Procedures

1.4 Acronyms and Abbreviations

Acronym	Description
BASP	Bus and Paratransit Agency Safety Plan
BIL	Bipartisan Infrastructure Law
BSSC	Bus Safety Steering Committee
CAP	Corrective Action Plan
CCH	City and County of Honolulu
CDC	Centers for Disease Control and Prevention
CFR	Code of Federal Regulations
COOP	Continuity of Operations Plan
CSSO	Chief Safety and Security Officer
DTS	Department of Transportation Services
EAP	Emergency Action Plan

Acronym	Description
EMP	Emergency Management Plan
ESRP	Employee Safety Reporting Program
EV	Electric Vehicle
FTA	United States Department of Transportation, Federal Transit Administration
GOP	General Operating Procedures
HESD	Honolulu Emergency Services Department
HEV	Hybrid Electric Vehicle
HFD	Honolulu Fire Department
HPD	Honolulu Police Department
HTL	Hazard Tracking Log
IAPP	Internal Audit Program Plan
MAP-21	Moving Ahead for Progress in the 21st Century Act
MESS	Manager of Emergency & Security Systems
MMIS	Maintenance Management Information System
MOC	Management of Change
MSS	Manager of Safety Systems
NTD	National Transit Database
NTSB	National Transportation Safety Board
OahuMPO	Oahu Metropolitan Planning Organization
O&M	Operations and Maintenance
OEM	Original Equipment Manufacturer

Acronym	Description
OTS	Oahu Transit Services
PPE	Personal Protective Equipment
PPW	Plans, Procedures, and Work Instructions
PTSCTP	Public Transportation Safety Certification Training Program
S&S	Safety and Security
SDS	Safety Data Sheets
SMS	Safety Management Systems
SOG	Standard Operating Guidelines
SPT	Safety Performance Target
SRI	Safety Risk Index
SRRP	Safety Risk Reduction Program
SSO	Safety and Security Office
TAMS	Transit Asset Management System
TrAMS	Transit Award Management System
TMD	Transportation Mobility Division
U.S.C.	United States Code
VRM	Vehicle Revenue Miles

1.5 Terms and Definitions

The following is a list of defined terms used throughout this document.

Terms	Definitions
Accountable Executive	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	As defined under 49 U.S.C. 5302, 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.
Chief Safety and Security Officer (CSSO)	An adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A CSSO may not serve in other operational or maintenance capacities.
Collision	Any impact between a bus transit vehicle and any other vehicle, object, or any person.
Corrective Action Plan (CAP)	A plan developed by the transit agency and/or its contractors that describes the actions the 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 FTA may require DTS to develop and carry out a corrective action plan.
Equivalent Authority	An entity that carries out duties similar to that of a Board of Directors, for a recipient or sub recipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.

Terms	Definitions
Fatality	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.
Hazard	Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
Injury	Any harm to persons as a result of an event that requires immediate medical attention away from the scene.
Inspection	A physical observation of equipment, facilities, rolling stock, operations, personnel, or records for the purpose of gathering or analyzing facts or information.
Investigation	The process of determining the causal and contributing factors of a safety or security event or hazard, for the purpose of preventing recurrence and mitigating safety and security risk.
Joint Labor-Management Process	A formal approach to discuss topics affecting transit workers and the public transportation system.
Large Urbanized Area Provider	A recipient or subrecipient of financial assistance under 49 U.S.C. 5307 that serves an urban area with a population of 200,000 or more as determined by the most recent decennial Census.
National Public Transportation Safety Plan	The plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. chapter 53.
Near Miss	A narrowly avoided safety event.
Passenger	A person who is on board, boarding, or alighting from a bus transit vehicle for the purpose of travel.

Terms	Definitions
Plan	A document developed and adopted by the transit agency describing its policies, objectives, responsibilities, and procedures for a given program, policy, or strategy.
Potential Consequence	The effect of a hazard.
Procedure	A set of fixed, written instructions or steps developed and adopted by the transit agency for carrying out a given plan or operation in a given situation.
Public Transportation Agency Safety Plan (PTASP)	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.
Revenue Service	The period of time when a Revenue Vehicle is available to the general public with the intent to carry passengers.
Revenue Vehicle	A transit vehicle used to provide Revenue Service for passengers. This includes providing fare free service.
Safety	Freedom from harm resulting from unintentional acts or circumstances.
Safety Assurance	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 Committee	The formal joint labor-management committee on issues related to safety that is required by 49 U.S.C. 5329 and 49 CFR Part 673.
Safety Event	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.

Terms	Definitions
Safety Management Systems (SMS)	The formal, 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 hazards and safety risk.
SMS Executive	A Chief Safety and Security Officer or an equivalent.
Safety Performance Measure	An expression used to establish targets and to assess progress toward meeting the established targets.
Safety Performance Target (SPT)	A quantifiable level of performance or condition, expressed as a value for the measure, related to safety management activities, to be achieved within a specified time period.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
Safety Risk	The composite of predicted severity and likelihood of a potential consequence of a hazard.
Safety Risk Assessment	The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risk.
Safety Risk Management	A process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating the safety risk of their potential consequences.
Safety Risk Mitigation	A method or methods to eliminate or reduce the severity and/or likelihood of a potential consequence of a hazard.
Safety set-aside	The allocation of not less than 0.75 percent of assistance received by a large urbanized area provider under 49 U.S.C. 5307 to safety-related projects eligible under 49 U.S.C. 5307.

Terms	Definitions
Safety and Security Certification	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	Freedom from harm resulting from intentional acts or circumstances.
Transit Worker	Any employee, contractor, or volunteer working on behalf of the transit agency.

1.6 Description of Changes from the Previous Revision

The initial version of this document was finalized and signed on June 4, 2020. The BASP has not been updated since the original plan was released. The FTA released updated 49 CFR Part 673 requirements on April 11, 2024. As such, DTS conducted a detailed gap analysis of the existing plan against the latest PTASP requirements, and performed a complete re-write of the document to meet the latest requirements and best practices.

2 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, 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

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 as shown on Figure 1.

The BASP is compliant with FTA regulations, specifically 49 CFR Parts 670 and 673, and 49 U.S.C. 5329. DTS and OTS are committed to implementing an SMS program. Pursuant to 49 CFR 673.21, the BASP 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 TheBus and TheHandi-Van.

Figure 1. SMS Principles

3 Systems Description

3.1 Scope of Transit Services

DTS provides fixed-route bus and complementary paratransit services, known as TheBus and TheHandi-Van, respectively, for the CCH (Island of Oahu), serving an approximate population of 1.1 million, including visitors. DTS oversees an active fleet of 488 fixed-route and 218 paratransit revenue vehicles, providing bus and paratransit services throughout the CCH, an area of 600 square miles.

DTS receives funding from the FTA under Sections 5307 (Urbanized Area Formula Grants), 5310 (Enhanced Mobility of Seniors and Individuals with Disabilities), 5337 (State of Good Repair Grants), and 5339 (Bus and Bus Facilities Program).

3.1.1 TheBus (Fixed-Route Bus Service)

TheBus consists of 114 fixed-route bus routes, covering approximately 187 million passenger miles annually and making 41 million unlinked passenger trips. In Fiscal Year 2024, TheBus system performed a total of 18.5 million vehicle revenue miles (VRM) and 1.4 million vehicle revenue hours.

3.1.2 TheHandi-Van (Paratransit Service)

TheHandi-Van provides a complementary demand-responsive service, covering approximately 10 million passenger miles annually and making 1 million unlinked passenger trips. In Fiscal Year 2024, TheHandi-Van system totaled 6.3 million VRM and 443,000 vehicle revenue hours.

3.2 Physical Plant

DTS is the owner of the physical plant and the bus and paratransit fleet. However, OTS as the contracted service provider is responsible for the day-to-day operations and maintenance of TheBus and TheHandi-Van systems.

3.2.1 Bus Stops, Bus Shelters and Transit Centers

There are approximately 3,769 bus stops, including around 1,158 that have bus shelters, within TheBus system. Additionally, TheBus system includes 10 transit centers and nine park-and-ride lots.

3.2.2 Operating Bases and Maintenance Facilities

3.2.2.1 Kalihi-Palama Bus Facility

The Kalihi-Palama Bus Facility located at 811 Middle Street, Honolulu, HI 96819, serves as the headquarters for OTS and consists of:

- Administrative Building (this building houses the Executive Offices as well as the administrative offices for all departments except the Paratransit Division. Offices for Finance, Operational Planning and Marketing, Human Resources, Fixed Route Transportation personnel and Central Control Operations for the system)
- Bus Maintenance Building
- Unit Repair Building
- Fueling and EV Charging Stations
- Bus Wash and Service Building

3.2.2.2 Kalihi-Palama Paratransit Facility

The Kalihi-Palama Paratransit Facility located at 611 Middle Street, Honolulu, HI 96819, is adjacent to the Bus Facility and consists of one mixed use operations and maintenance building.

3.2.2.3 Pearl City Bus Facility

The Pearl City Bus Facility is comprised of the Fixed Route Transportation Offices and Operators Ready Area, located at 1200 Waimano Home Road, Pearl City, HI 96782 and consists of:

- Operations Building (a secondary Central Communications Center is housed in this building, and serves as a back-up in the event the Kalihi-Palama Central Control Center is compromised)
- Bus Maintenance Building
- Bus Wash and Service Building
- Fueling Station

3.2.3 Bus and Paratransit Vehicles

OTS currently operates and maintains a fleet of 488 fixed-route buses, and 218 paratransit revenue vehicles. Rolling stock assets are maintained at the three bus facilities.

Table 1. Bus and Paratransit Vehicle Fleet Distribution

Facility	Vehicle Type	Quantity	Fleet Composition
Kalihi-Palama Bus Facility	Fixed-Route Buses	267	- 8, 30 ft. buses - 11, 35 ft. buses, including 1 electric vehicle (EV) - 186, 40 ft. buses, including 16 hybrid electric vehicles (HEVs) and 16 EVs - 62, 60 ft. buses, including 20 HEVs
	Non-Revenue Service Vehicles	45	
Kalihi-Palama Paratransit Facility	Ford E450 Vans	129	
	Ford Transit 150	31	
	Nissan Rogue	8	
Pearl City Bus Facility	Fixed-Route Buses	221	- 4, 30 ft. buses - 8, 35 ft. buses - 154, 40 ft. buses - 55, 60 ft. buses, including 14 HEVs
	Non-Revenue Service Vehicles	34	
	Ford E450 Vans	50	

4 COMPONENT 1 – SAFETY MANAGEMENT POLICY

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

Per 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 an ESRP 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 and OTS organizations through the training programs.

4.1 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.

4.2 BASP Policies

DTS adheres to the following 49 CFR Parts 670 and 673 requirements in implementing this BASP:

1. This BASP, and subsequent updates, are approved and signed by the DTS Director (Accountable Executive), CSSO, the Bus Safety Steering Committee (BSSC), and the Honolulu City Council.
2. This BASP documents the processes and activities related to SMS implementation.
3. This BASP addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan, including SPTs based on the FTA's safety performance measures.
4. DTS has established a process and timeline for conducting an annual review and update of the BASP which ensures the required approvals are obtained.
5. DTS includes or incorporates by reference in the BASP 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 policies and procedures for TheBus and TheHandi-Van systems:

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 safety 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 BASP and OTS Agency Safety Plan are communicated throughout the DTS and OTS organizations through the training programs.

4.3 Goals and Objectives

The BASP 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 TheBus and TheHandi-Van systems.
- Identify, eliminate, and/or mitigate safety risks and hazards throughout the transit systems. 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 O&M 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 BASP 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 SPTs to quantifiably measure the level of performance based on the FTA's safety performance measures.

The BASP 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 DTS and OTS 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 OTS Maintenance Plan and original equipment manufacturer (OEM) specifications and are audited as part of the DTS Internal Safety Audit Program.
- Confirm the BSSC meet on a monthly basis and official meeting minutes are prepared and distributed to stakeholders.
- Confirm the safety risk management process is followed through review of each identified hazard's assessed severity and likelihood of consequences.
- Confirm OTS 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 OTS 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 OTS notifies DTS and FTA of all reportable Safety Events.
- Confirm OTS 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 approved by DTS.
- Confirm OTS submits monthly status investigation reports until the final investigation report is approved by DTS.

4.4 Authorities, Accountabilities, and Responsibilities

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 Safety Committee 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 TheBus and TheHandi-Van systems. The DTS Director 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 the DTS Safety and Security Office (SSO) will develop and carry out, under the direction of the DTS Director, 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 **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 4.4.1.1 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, CSSO 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 **DTS Manager of Emergency & Security Systems (MESS)**, along with the **BSSC,** are designated as **Key Staff and Safety Committee** to support the Accountable Executive and the CSSO/SMS Executive in developing, implementing and overseeing the DTS' SMS. Refer to Sections 4.4.1.2, 4.4.1.3, and 6.3.2 for additional information on the DTS MSS, MESS, and the Safety Committee, respectively.

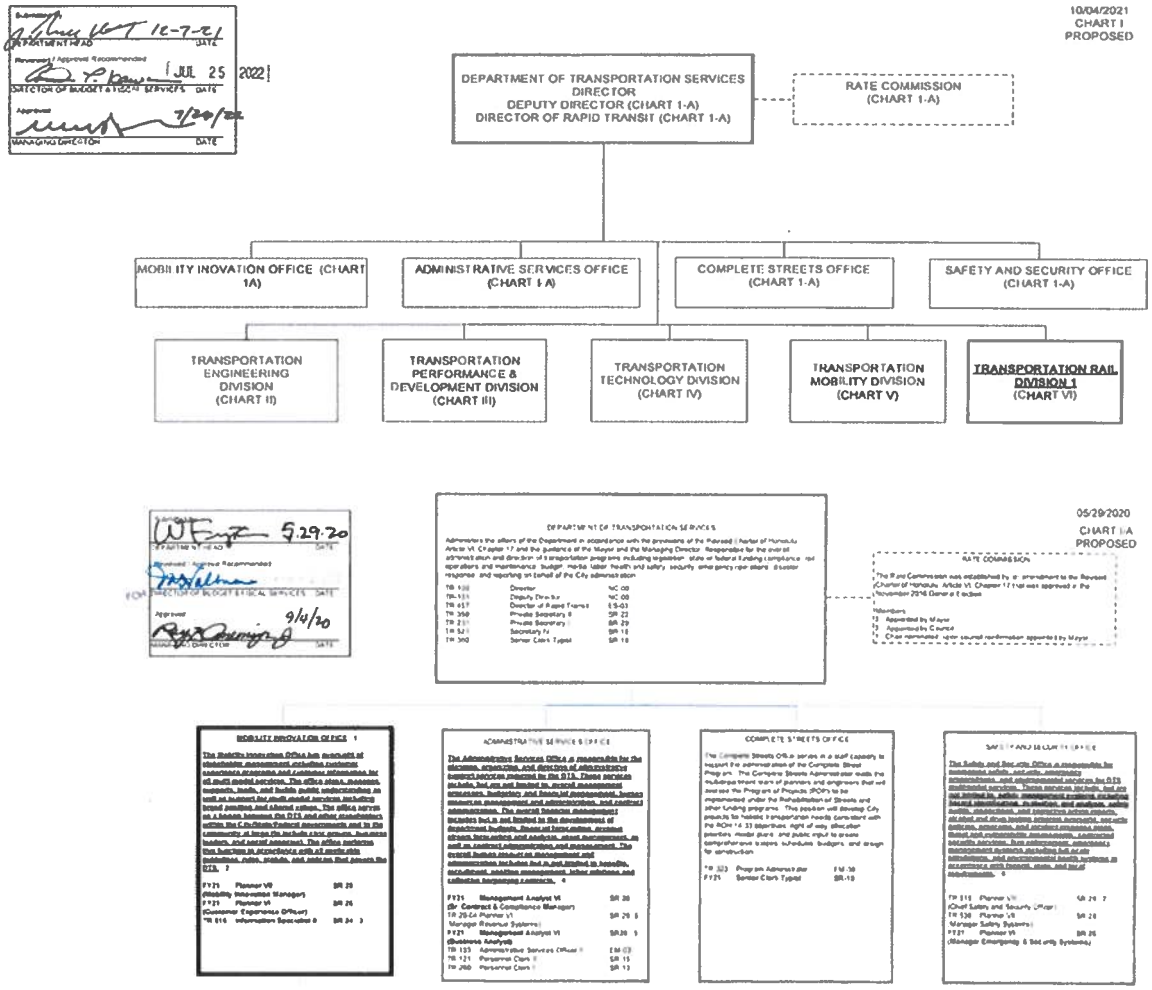
- The **Honolulu City Council** is the **Equivalent Authority to a Board of Directors** responsible for approving updates to the BASP.

The approved DTS organizational structure is shown on Figure 2. 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 BASP, 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.

Figure 2. DTS Organizational Chart



4.4.1 Safety and Security Office Organization and Oversight Responsibilities

The DTS SSO is responsible for overseeing the safety and security programs of TheBus and TheHandi-Van systems. 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 OTS safety and security activities.

4.4.1.1 Chief Safety and Security Officer

The DTS CSSO is responsible for safety, emergency, and security design criteria, policies, PPWs, practices, and activities for multimodal transportation. The position has overall responsibility for the DTS SSO including environmental, health and safety, system safety and compliance, emergency, cybersecurity, and security functions. The position serves as the safety, emergency, and security subject matter expert. The position is the primary liaison with the FTA 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:

- Lead and chair the monthly BSSC meetings to discuss system safety and security issues;
- Reviewing the BASP annually;
- Ensuring annual Internal Safety Audits and other audits as required are completed, including the preparation of Final Audit Reports;
- Ensuring DTS submits the required safety and security data to the National Transit Database (NTD);
- Participating in annual emergency preparedness drills and tabletop exercises;
- Coordinating risk management activities with the OTS Director of Safety and Security, including but not limited to review of the HTL and CAP Log;
- Participating in meetings with FTA; and
- Managing and updating SMS processes based on experiences and lessons learned.

The DTS CSSO manages the DTS MSS and DTS MESS and oversees and coordinates with the OTS Director of Safety and Security.

4.4.1.2 Manager of Safety Systems

The DTS MSS is responsible for multimodal agency safety plans including SMS, 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 CAPs. Responsible for analyzing situations, identifying problems, recommending practical solutions, and evaluating outcomes. The position is responsible for assisting the DTS CSSO with the implementation and maintenance of the BASP and overseeing OTS in performing hazard identification, reporting, mitigation, and CAPs.

Other oversight responsibilities include, but are not limited to:

- Participating in the monthly BSSC meetings to discuss system safety issues;
- Conducting safety audits and inspections as required;
- Participating in audits related to system safety;
- Participating in annual emergency preparedness drills and tabletop exercises;
- Reviewing OTS CAPs as required;
- Communicating lessons learned with employees and contractors; and
- Providing SMS training to employees and contractors.

4.4.1.3 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 overseeing emergency management and security programs, training, procedures, drills and exercises, and serves 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 the monthly BSSC meetings to discuss emergency and security issues;
- 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 OTS emergency drill after-action reports; and
- Reviewing OTS CAPs as required.

4.4.2 Contractor Oversight Structure

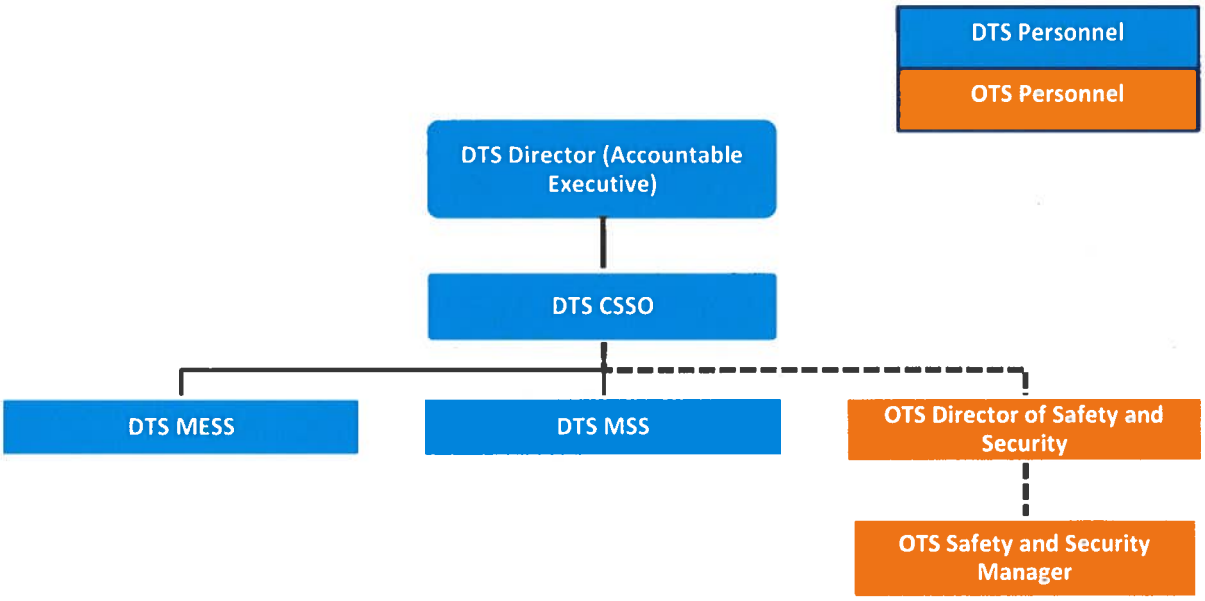
Since 1992, OTS has served as the Transit Management Services Contractor, operating Bus and Paratransit services for DTS under the Revised Ordinances of Honolulu Section 15B, Article 8. Per the CT-DTS-C53257 agreement, OTS is under contract to operate and maintain TheBus and TheHandi-Van systems. The management and oversight of the BASP is the responsibility of the DTS CSSO.

Consequently, the implementation of the BASP activities is primarily the responsibility of two organizations:

- DTS
- OTS

The following organizational chart (Figure 3) presents the contractor oversight structure for the DTS SSO.

Figure 3. DTS SSO Contractor Oversight Structure



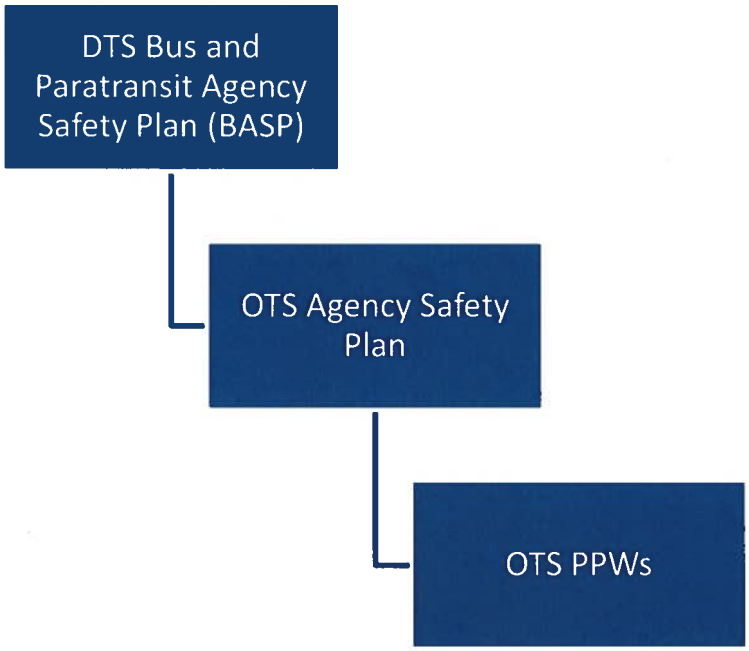
4.5 BASP Implementation

DTS is the agency responsible for overseeing and managing the BASP for bus and paratransit operations and maintenance and is accountable for system safety and security. OTS is responsible for the day-to-day safety and security activities on TheBus and TheHandi-Van systems.

4.5.1 System Safety Document Hierarchy

As shown in Figure 4, OTS as the Transit Management Services Contractor supports DTS in the implementation of its BASP. Various supporting PPWs ensure OTS, with DTS oversight, achieve the BASP goals and objectives.

Figure 4. System Safety Document Hierarchy



4.5.2 BASP Activities and Tasks

The DTS SSO is responsible for overseeing the implementation of the BASP. Specifically, the DTS SSO is responsible for:

- Issuing and maintaining the BASP.
- Ensuring DTS uploads the revised BASP to the FTA's Transit Award Management System (TrAMS) to certify its compliance with 49 CFR Part 673 and 49 U.S.C. 5329(d).

- Promoting SMS.
- Reviewing and approving safety and security policies, rules, and PPWs prepared by OTS in support of operations and maintenance.
- Chairing and managing the BSSC.
- Overseeing the hazard management process implemented by OTS.
- Implementing safety certification programs for new system modifications.
- Reporting to FTA, NTD, and National Transportation Safety Board (NTSB) on safety and security issues as required.
- Ensuring OTS provides timely event notification, investigation and reporting as described in the OTS Field Operations Standard Operating Guidelines (SOGs).
- Overseeing emergency response planning/coordination/training as established by the OTS Emergency Action Plan (EAP).
- Overseeing internal safety, security and emergency reviews and audit processes.
- Ensuring DTS prepares a Final Audit Report that documents the internal audits conducted for the calendar year.
- Ensuring compliance/procedures reviews.
- Auditing OTS maintenance reviews/inspections.
- Auditing OTS training and certification reviews.
- Demonstrating compliance with local, state and federal requirements.
- Overseeing a hazardous materials program implemented by OTS.
- Ensuring compliance with the TheBus and TheHandi-Van Drug and Alcohol Program including conducting audits on the OTS Drug and Alcohol Policy and Program as part of the DTS Internal Safety Audit Program.

OTS is responsible for the day-to-day activities associated with operating and maintaining the bus and paratransit systems. OTS is responsible for implementing and maintaining its PPWs to support the following BASP responsibilities:

- Maintain a current SMS Implementation Plan with annual reviews and updates on an as-needed basis to ensure compliance with the DTS BASP.
- Ensure the SMS Policy is communicated throughout the organization and that each OTS employee (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. OTS is encouraged to provide the same training to all of its employees.

- Maintain a current HTL and CAP Log.
- Participate in the monthly BSSC meetings and provide updates to the CAP Log, HTL, rules compliance, and status of event investigations. The committee shares the outcomes of event investigations, status of corrective actions and/or safety risk mitigations, as well as applicable statistics. The BSSC reviews and approves revisions to the DTS BASP.
- Develop and implement a Safety Risk Reduction Program (SRRP) 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 NTD under 49 U.S.C. 5335. Continuously update safety and security performance targets for the risk reduction program using a 3-year rolling average of the data submitted to NTD. 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.
- Maintain a current Emergency Management Plan (EMP) with annual reviews and updates.
- Maintain a current Safety Risk Management Process, Policy and Procedures with annual reviews and updates including a detailed hazard management process.
- Maintain current MOC procedures, including Configuration Management – process for identifying and assessing changes, which may introduce new hazards or impact the transit agency's performance.
- Maintain current CAP Procedures – process used to develop, implement, and track corrective actions, which address investigation findings.
- Prepare and establish operations and maintenance policies, rules, and PPWs to include any bulletins, which are reviewed and updated annually.
- Maintain current Rules Compliance Procedures – operating and maintenance rules and procedures, which affect safety are regularly reviewed and updated.
- Maintain a current Facilities and Equipment Inspection and Audit Program with annual reviews and updates. Regular inspections are to be conducted,

memorialized, and deficiencies are logged typically as Work Orders in the Maintenance Management Information System (MMIS). Work Orders not closed in a timely manner may result in a CAP, as determined by the DTS CSSO. Audits are to be conducted to confirm preventive maintenance and 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.

4.5.3 Integration of Safety Functions into Operations and Maintenance Activities

The DTS SSO interfaces and communicates with various departments within the CCH, outside agencies, and contractors.

Listed below are the primary stakeholders which interface with the DTS SSO for the bus and paratransit systems:

- OTS
- Honolulu Police Department (HPD)
- Honolulu Fire Department (HFD)
- Honolulu Emergency Services Department (HESD)
- Honolulu Department of Emergency Management
- FTA
- Department of Homeland Security, Transportation Security Administration

The DTS SSO collaborates with these organizations to receive information, identify safety concerns, conduct internal reviews and inspections, develop recommendations and review and approve CAPs, and track and verify implementation.

The DTS SSO coordinates with these departments and agencies through the BSSC. Refer to Section 6.3.2 for further details on the BSSC.

4.6 Safety Plan Documentation

DTS and OTS must maintain documents which establish its BASP, including those related to the implementation of its SMS, and results from SMS processes and activities. DTS and OTS 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 BASP. The FTA and other federal agencies 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.

4.7 BASP Control and Update Procedures

The DTS CSSO submits the revised BASP to the BSSC, 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 BASP. Once all stakeholder comments are addressed, the Accountable Executive signs as the authorizer and presents the BASP to the Honolulu City Council for adoption.

Once approved, the DTS CSSO uploads the revised BASP to the FTA TrAMS for annual certification.

4.7.1 Review of Annual Submission

Annually, DTS reviews and updates its BASP 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, the DTS CSSO will prepare and submit by January 31 formal correspondence notifying the BSSC and the DTS Director of this determination.

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

To ensure consistency between the BASP and supporting documents, DTS requires OTS to annually review and update its SMS Implementation Plan concurrently while the BASP is in the review process. The OTS SMS Implementation Plan is reviewed and accepted by the DTS CSSO.

In addition, DTS requires OTS to annually review and update other relevant PPWs concurrently while the BASP is in the review process. All OTS PPWs in support of the implementation of the BASP are reviewed and accepted by DTS.

The schedule for annual review of the BASP is provided in Table 2 below.

Table 2. Schedule for Annual Review of BASP

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

4.7.2 Review of Periodic Submission

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

If the DTS CSSO identifies a change to the BASP as significant, DTS will submit a revised BASP to the BSSC and DTS Director within 30 calendar days of the effective date of the

change, otherwise, minor changes to the document will be submitted with the annual submission.

5 COMPONENT 2 – SAFETY RISK MANAGEMENT

The Safety Risk Management component is comprised of the processes, activities, and tools DTS and OTS 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 Safety Risk Management process, which includes:

- Safety Hazard Identification
- Safety Risk Assessment
- Safety Risk Mitigation
- Safety Risk Documentation and Communication

In support of the DTS BASP, OTS implements a Safety Risk Management process for bus and paratransit services, 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 Documentation and Communication: establish methods or processes for tracking and reporting safety risks and mitigation strategies, ensure ongoing communication with the DTS CSSO.

DTS oversees the OTS Safety Risk Management Program through the following activities:

- Conduct audits of the OTS Safety Risk Management Program as part of the DTS Internal Safety Audit Program.
- Chair the monthly BSSC meetings and discuss any hazards and risks identified by or reported to OTS.
- Review, approve, and track all HTL and CAP Log entries.

5.1 Safety Risk Management Process Overview

The Safety Risk Management process is the structured and ongoing method used by DTS and OTS to identify, assess, and mitigate safety risks associated with transit operations, facilities, and vehicles. It ensures that hazards are systematically evaluated and addressed to protect passengers, employees, and the public.

A safety hazard is any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment. Hazards are identified through multiple sources, including employee reports, safety event investigations, audits, inspections, and other internal and external inputs.

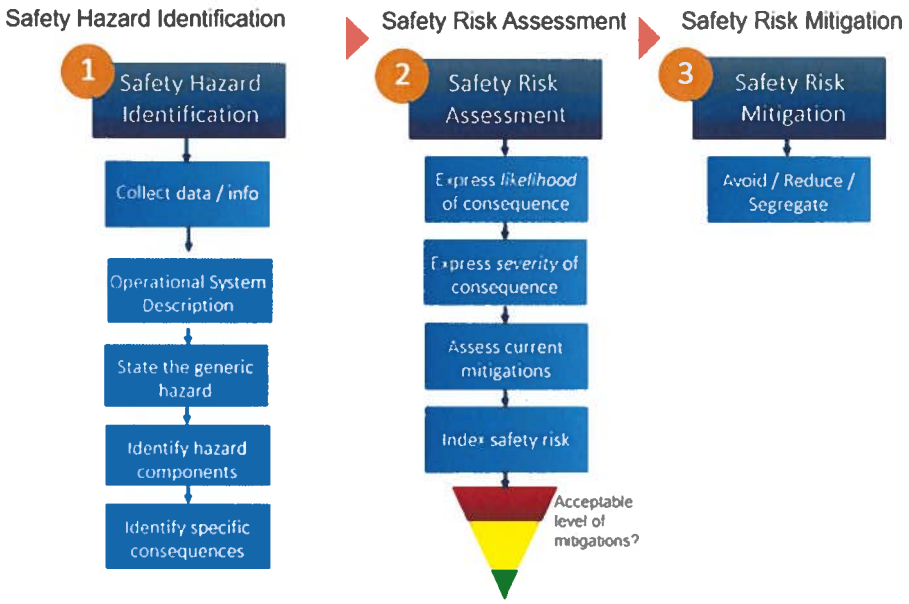
Once identified, hazards are assessed for their potential consequences using a risk matrix that considers both likelihood and severity. Based on this assessment, DTS and OTS determine appropriate safety risk mitigations to reduce the likelihood and/or severity of potential consequences. This process is accessible to all levels of the organization and is integrated into day-to-day operations and maintenance activities to support proactive safety management and continuous improvement.

The Safety Risk Management process includes the following key activities:

- Identifying hazards that may arise from system elements, operational activities, or external sources.
- Assessing safety risks by evaluating the potential consequences of each hazard, including the likelihood and severity of associated safety events.
- Prioritizing risks to determine which hazards require immediate or high-priority mitigation.
- Developing and implementing mitigation strategies to eliminate or reduce the likelihood and/or severity of the consequences of identified hazards.
- Tracking and documenting hazards and mitigations through their lifecycle, including status updates and closure.
- Immediately reporting "Unacceptable" hazards to the DTS CSSO, who notifies the DTS Director (Accountable Executive).
- Evaluating the effectiveness of mitigations to ensure they are performing as intended and adjusting them as necessary.

An overview of the Safety Risk Management process is described in Figure 5.

Figure 5. Safety Risk Management Process



5.2 Safety Hazard Identification Process

Safety Hazard identification is a process to discover conditions in the system that if not altered, has the potential to cause safety events or significant material losses. All employees are charged with the responsibility of identifying and reporting conditions that have the potential to cause safety events or other losses. These conditions may be found in the form of physical hazards, unsafe actions, and policies that create or fail to recognize hazards.

Safety Hazard Identification is the first step in the Safety Risk Management process. It involves the following activities:

- Data and Information Collection
- Operational System Description
- Hazard Analysis
  - State the Generic Hazard(s)
  - Identify Hazard Components
  - Identify Specific Consequences

5.2.1 Data and Information Collection

DTS and OTS monitors the safety performance of bus and paratransit services, including equipment and personnel. Safety-related data is analyzed and plotted for trends and statistical analyses. Operating hazards are reported, discussed and tracked in the monthly BSSC meetings. Safety performance and statistical data are stored and organized in the OTS MMIS database.

DTS and OTS incorporate several methods for identifying hazards on the operating bus and paratransit systems. Hazard identification sources include, but are not limited to, the following:

- **Safety Committee Meetings** – DTS and OTS safety committee meetings, e.g., the BSSC, serve as sources for hazard information.
- **Operations Activity Reports including Customer Complaints** – Daily reports generated by internal software systems, e.g., TransitMaster and Customer Service Reports, are reviewed by OTS for hazardous conditions. In addition, the BSSC reviews customer complaints on a monthly basis.
- **ESRP and Confidential Employee Reporting** – Through the implementation of SMS, all DTS and OTS employees are encouraged and required to report hazardous conditions. These can be reported to a supervisor, Central Control, or the DTS CSSO, without fear of retaliation.
- **Safety Event Investigations** – DTS and OTS investigate all safety events to identify contributing factors and potential hazards.
- **Vehicle and Facilities Maintenance Audits and Inspection Reports** – OTS employees and contractors routinely conduct audits, inspections and/or preventive maintenance activities. During the course of those activities, employees and contractors may come across hazards which they are encouraged to report to a supervisor, Central Control, or the DTS CSSO.
- **Findings and Recommendations from Internal Safety Audits and Field Inspections** – DTS conducts internal safety audits on the activities identified in the BASP. DTS requires OTS to initiate CAPs based on findings and recommendations from the internal safety audits, as necessary, which are added to the CAP log. DTS SSO personnel also conduct scheduled and unscheduled field inspections, which may also result in identification of hazardous conditions.
- **Findings and Recommendations from External Safety Audits** – FTA and other outside agencies may conduct external safety audits, e.g., triennial audits, which may result in identification of hazardous conditions.

- **Close-Call/Near Miss Event Reports** – Through the implementation of SMS, all DTS and OTS employees are required to report Close-Call events. Near Miss and Close-Call events are to be immediately reported to Central Control.
- **MOC** – If DTS or OTS determine that a change may impact its safety performance, then the proposed change will be evaluated through the Safety Risk Management process.
- **Emergency Tabletop and Drill Exercises** – OTS conducts an annual emergency response exercise. Findings and recommendations from the exercises are documented in after-action reports.
- **Other Agencies** – DTS and OTS use notifications, safety bulletins, publications, audits/inspections and applicable standards from federal, state, local and industry sources to collect hazard information.

5.2.2 Operational System Description

The second step in the Safety Hazard Identification process is to establish the scope of the hazard analysis and safety risk assessment activities through an Operational System Description. An Operational System Description is the analysis of operations to gain an understanding of critical operational interactions to identify hazards, or those that have been identified, as well as to identify the mitigations in place to safeguard against the consequences of hazards.

The description should identify:

- The operational system components and activities
- The interactions between operational components and activities
- Applicable regulatory requirements under which the operation will take place
- Existing mitigations

Defining the physical and functional characteristics of the system to be analyzed provides a tool to better understand location in the practical drift and provides a written record for your baseline condition. These characteristics are considered in terms of the individual elements, which make up the total system, including:

- Environment
    - Bus Routes
    - Roadways/Traffic Patterns
    - Rail/Bus Terminals and Transfer Stations

  - Elevated Structures and Bridges
- Technology
  - Bus and Paratransit Vehicles
  - Traffic Signals
  - Equipment and Subsystems
- Procedures
  - Pre-trip inspections
  - Event Reporting
  - Hazard/Safety Risk Identification and Mitigations
- People
  - Employees
  - Roles and Responsibilities
  - Customers and the Public

A thorough knowledge and understanding of how individual system elements interface with each other is essential to the hazard identification effort.

5.2.3 Hazard Analysis

Once a hazard is identified, the next step is to analyze the hazard to understand its potential impact on the transit system. Hazard Analysis supports the Safety Risk Management process by determining how a hazard could lead to safety events and what factors contribute to its risk.

Hazard Analysis is a structured, three-step process:

A. **State the Generic Hazard** – Identify the generic hazard (i.e., the overarching hazard category) to provide focus and perspective on a safety issue, while also helping to simplify the tracking and classification of many individual hazards flowing from the generic hazard. This helps group related hazards and supports trend analysis.

B. **Identify Hazard Components** – Breakdown the generic hazard into specific hazards or hazard components. Each component may have unique causal factors and may require different mitigation strategies.

C. **Identify Specific Consequences** – Link each hazard component to potential outcomes, such as injuries, fatalities, property damage, or service disruptions. These consequences will inform the subsequent Safety Risk Assessment.

Hazard Analysis draws on data collected from internal reports, inspections, employee input, and other sources. The results of each analysis are documented and used to support the evaluation of safety risk and the development of appropriate mitigations.

5.3 Safety Risk Assessment Process

Safety Risk Assessment is the second step in the Safety Risk Management process. It is used to evaluate the potential consequences of identified hazards and determine whether the associated safety risk is Acceptable, Acceptable with Review, Undesirable, or Unacceptable. This process supports informed decision-making by prioritizing hazards based on their risk level and guiding the development of appropriate mitigation strategies.

The assessment process involves estimating the likelihood and severity of potential consequences, considering the effectiveness of any existing mitigations, and using a risk matrix to determine a Safety Risk Index (SRI). This index helps categorize and prioritize risks and supports the determination of whether further action is required.

While DTS and OTS may reference established standards such as MIL-STD-882E for system safety practices, the agency's risk assessment process is tailored to reflect FTA's SMS principles and the specific operational context of TheBus and TheHandi-Van systems. Staff may use either deductive or inductive evaluation methods, depending on circumstances, to determine ratings for likelihood and severity of a consequence.

The Safety Risk Assessment process includes the following key activities:

- Express Likelihood of Consequence
- Express Severity of Consequence
- Assess Current Mitigations
- Index Safety Risk
- Determine Safety Risk Tolerability

5.3.1 Express Likelihood of Consequence

For each identified hazard, the likelihood that a specific consequence will occur during the life of the system is assigned. Likelihood is expressed using a qualitative scale based on research, analysis, or historical safety data from similar transit systems.

Safety risk likelihood levels are shown in Figure 6.

Figure 6. Safety Risk Likelihood Levels

Likelihood	Level	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.

5.3.2 Express Severity of Consequence

For each identified hazard, the severity of the potential consequence is evaluated, considering the impact on people, property, operations, and the environment. Severity is also expressed using a defined scale. A safety risk 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	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 mitigated 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.

5.3.3 Assess Current Mitigations

Existing controls or mitigations are reviewed to determine their effectiveness in reducing the likelihood or severity of the consequence. This step ensures that the risk assessment reflects the current safety environment.

5.3.4 Index Safety Risk

The likelihood and severity ratings are combined using a risk matrix to determine an SRI, as shown in Figure 8. Once the likelihood and severity of the worst credible outcome have been established, the SRI can be calculated, i.e., the level of safety risk as a composite of likelihood and severity of the potential consequence of the hazard. This index helps categorize the risk level (i.e., acceptable, low, medium, high) and supports prioritization. This step allows you to complete your assessment of the acceptability of the safety risk.

Figure 8. Safety Risk Index

Likelihood 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			

5.3.5 Determine Level of Acceptability

The final step of the Safety Risk Assessment process is to determine 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 SRI quantifies the necessity for implementing mitigation measures to reduce the risk to an acceptable level. DTS and OTS uses the SRI to prioritize hazardous conditions and allocate resources to address the most serious risks. The results of the assessments are documented and presented to the BSSC for review and acceptance.

The SRI value determines the specific level of action required. Hazards with a risk index classified as "Unacceptable" or "Undesirable" are not permitted and must be eliminated or mitigated to an acceptable level. Refer to Figure 9 for the Safety Risk Acceptance Criteria.

Figure 9. Safety Risk Acceptance Criteria

	SRI	Decision Authority	Special Conditions
High	1A, 1B, 2A, 2B, 3A	Unacceptable	Requires immediate mitigation
Medium	1C, 1D, 2C, 2D, 3B, 3C	Undesirable	Actions require CSSO review and approval, with concurrence from the Accountable Executive
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

Hazards, which affect the safety and security of bus and paratransit operations, classified as "Unacceptable" (likely to cause death, system loss, or severe environmental damage) are reported by OTS to the DTS CSSO within 4 hours telephonically, following

the determination of the unsafe condition, 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 transit system, such as removing a specific vehicle from service, suspending service on specific routes, rerouting vehicles, temporarily halting operations at a facility, or pausing bus or paratransit services until appropriate safety measures are implemented.

OTS will transmit a formal hazard investigation report along with electronic copies of the completed worksheets, forms, or other documentation supporting the analysis and the identification of the "Unacceptable" hazard within 7 calendar days of the hazard being reported to the DTS CSSO for review and approval.

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

For all other hazards and safety risks, OTS is responsible for providing HTL updates during the monthly BSSC 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 individual performing the assessment is responsible for immediately notifying Central Control, if they are not already involved. Ultimately the OTS Director of Safety and Security will notify the DTS CSSO, who will inform the DTS Director (Accountable Executive) as appropriate.

5.4 Safety Risk Mitigation Process

Safety Risk Mitigation is the third step in the Safety Risk Management process. It involves identifying and implementing strategies to eliminate or reduce the likelihood and/or severity of the consequences associated with identified safety risks. The goal is to reduce safety risk to a level that is acceptable or tolerable, based on agency-defined thresholds.

Mitigations may include engineering controls, administrative procedures, training, policy changes, or operational adjustments. These actions are selected based on the results of the Safety Risk Assessment and are prioritized according to the level of risk.

Mitigations must be:

- Feasible and appropriate for the operational context
- Balanced in terms of cost, benefit, and operational impact
- Monitored through the Safety Assurance process to ensure they are effective and sustained over time.

The Safety Risk Mitigation process includes the following key activities:

- Identifying appropriate mitigation strategies for each "Unacceptable" or "Undesirable" risk.
- Assigning responsibility for implementation and oversight.
- Documenting mitigation actions and timelines.
- Monitoring mitigation effectiveness through performance data, inspections, and feedback mechanisms.
- Adjusting or enhancing mitigations as needed based on Safety Assurance findings.

5.4.1 Safety Risk Mitigation and Elimination: Strategy to Resolve/Minimize Exposure of Public, Personnel, and Property to Hazards/Unsafe Conditions

The Safety Risk Mitigation 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 mitigation measures are necessary.

The last step in the Safety Risk Mitigation process is the follow-up. DTS and OTS will monitor the effectiveness of the recommended mitigation measures and ensure new hazards are not introduced as a result. DTS and OTS 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.

5.4.2 Corrective Action Plan Procedures

Hazards with an SRI value classified as "Unacceptable" or "Undesirable" will require entry into the HTL and a formal written CAP and entry in the CAP Log.

5.4.2.1 CAP Program Requirements

DTS ensures OTS develops, implements, and maintains a written CAP Program which is compliant with this section. The CAP procedures shall include:

- A description of the individuals, departments, and agencies 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 Audit Program:** CAPs are developed when findings of non-compliance are identified from internal safety 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, FTA 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:** CAPs are developed to address findings and recommendations from formal hazard analyses (e.g., Preliminary Hazard Analysis, Failure Mode and Effects Analysis, Operations Hazard Analysis, Fault Tree Analysis).
- **Safety Event Investigations:** CAPs are developed when the results of event investigations identify causal or contributing factors which can be minimized, mitigated, 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 FTA and the DTS CSSO.
- **FTA Triennial Audits:** CAPs are developed for findings resulting from FTA Triennial 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 DTS'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 OTS with review and approval by the DTS CSSO 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 notification process, including coordination with the DTS CSSO.
- A description of the CAP review and approval process, including coordination with the DTS CSSO.

- The procedure shall describe the process OTS will follow to resolve disagreements with DTS regarding CAP development, approval, implementation, monitoring, or tracking.
- A description of the CAP monitoring and tracking process, including a sample CAP Log.
- A description of the process to review and update the CAP Program, as required.
- A description of the roles and responsibilities of the delegated duties and responsibilities to OTS, including an organizational chart.
- A description of the authorization for OTS to make notifications, to create reports, to submit corrective actions, and to speak on behalf of DTS on safety and security issues.
- An identification of specific individual(s) within OTS with overarching responsibility for the delivery of contractor services and authority to resolve issues, such as non-responsiveness to DTS-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.

5.4.2.2 CAP General Requirements

In any instance in which a CAP must be developed and carried out, the entity responsible shall not perform work on any CAP prior to review/approval from the DTS CSSO. There is an exception for immediate or emergency corrective actions which must be taken to ensure immediate safety, provided OTS provides DTS with timely notification and is subsequently reviewed and approved.

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.

OTS provides CAP updates to DTS on a monthly basis during the BSSC meetings. DTS may monitor OTS' progress in carrying out the CAP through unannounced, on-site inspections, or any other means DTS deems necessary or appropriate.

5.4.2.3 CAP Notification Requirements

OTS ensures each CAP is submitted to the DTS CSSO for review and approval within 30 calendar days after the need for the CAP has been identified. Depending on the complexity of the issue requiring corrective action, and at DTS's discretion, OTS may be

granted additional time to prepare the CAP. In cases where an emergency CAP is deemed necessary and implementation is initiated, OTS will be required to notify DTS by 5:00 PM the following business day to initiate formal review and approval.

5.4.2.4 CAP Review and Approval Process

The DTS CSSO will notify OTS 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, the DTS CSSO will notify OTS in writing on or before the 10th day and provide a revised date for the completion of the review. In the event DTS does not approve a CAP, DTS will state its reasons in writing and recommended revisions. In these instances, OTS will submit a revised CAP to DTS within 30 calendar days following the disapproval.

5.4.2.5 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 DTS and OTS to communicate and resolve these issues in order to reach an agreement on corrective actions necessary to ensure safe, secure, and resilient bus and paratransit services. 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 OTS disagrees with the rationale for DTS's disapproval of a CAP and recommended revisions, the DTS CSSO and the OTS Director of Safety and Security 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 the DTS CSSO and the OTS Director of Safety and Security 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 OTS Director of Safety and Security 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 OTS President and General Manager. The DTS Director has ultimate authority over the CAP Program. It is within their discretion to attempt to resolve safety and/or security issues with the OTS President and General Manager.

DTS will consider the issue resolved when OTS submits written notice of resolution, including the agreed-upon CAP developed based on the process described above.

5.4.2.6 CAP Monitoring and Tracking Log

OTS maintains a CAP Log identifying all CAPs reviewed and approved by the DTS CSSO, as well as the status of each CAP. OTS provides regular updates of CAPs at the monthly BSSC 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 OTS and the DTS CSSO. Submittals may be subject to change based on holidays or extenuating circumstances, if agreed upon in writing by OTS and the DTS CSSO.

DTS CAPs and related updates are provided by the DTS CSSO to OTS for addition to the CAP Log.

The CAP Log contains the following information at a minimum:

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, Triennial 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 to address the finding
Initial Safety Risk Index	The safety risk severity and likelihood (or SRI) 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 the owner of the CAP wishes to modify an open action, the proposed alternative must be described in sufficient detail so DTS CSSO can determine its acceptability as a substitute for the originally approved CAP. If there is disagreement between OTS and DTS regarding CAP changes, the process described in the Section 5.4.2.5 will be implemented to resolve differences
CAP Due Date	The estimated date of completion of the CAP. If 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 SRI) 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

5.5 Safety Risk Documentation and Communication

The DTS Safety Risk Management process includes structured methods for tracking, communicating and documenting safety risks, hazards, and mitigation strategies. These activities ensure transparency, accountability, and compliance with 49 CFR 673.31.

5.5.1 Hazard Tracking: Methods for Tracking and Reporting Safety Risks

The identification and management of hazards is a key element of the Safety Risk Management 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 OTS function, in coordination with the DTS CSSO.
- OTS provides an updated copy of the HTL to the DTS CSSO on a monthly basis for review and acceptance.

OTS maintains the HTL to monitor the status of identified hazards and associated mitigations. This log includes information on hazard origin, risk assessment results, mitigation strategies, responsible parties, and current status. The log is reviewed by the DTS CSSO regularly to ensure timely resolution and risk control. The HTL contains the following information at a minimum:

- ID Number
- Hazard Description
- Date Identified
- Mode/Location

- Hazard Source
- Employee Assigned to the Hazard
- Initial SRI
- Immediate Actions and Interim Mitigation (if applicable) with documentation
- Hazard Resolution/CAPs
- Post-mitigation SRI
- Target Date for Completion
- Last Mitigation Effectiveness Review Date
- Status

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.

OTS periodically verifies implemented safety risk mitigations are still viable by conducting a mitigation effectiveness review.

5.5.2 OTS Communication with DTS CSSO

All OTS safety risk information, including new hazards, mitigation updates, and unresolved risks, is communicated to the DTS CSSO on an ongoing basis. This ensures that DTS remains informed and can make timely decisions regarding risk prioritization and mitigation approval.

5.5.3 Recordkeeping and Documentation Standards

DTS and OTS maintain documentation of all Safety Risk Management activities in accordance with 49 CFR 673.31. Records include hazard reports, risk assessments, mitigation plans, and communication logs. These records are retained for a minimum of three years and are available for audit or oversight upon request.

5.6 Strategies to Minimize Exposure to Infectious Diseases

Pursuant to the Bipartisan Infrastructure Law (BIL) revisions to 49 U.S.C. 5329(d), DTS and OTS 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

6 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 monitored 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 SPTs. DTS ensures its safety objectives are met through the collection and analysis of safety data, including the tracking of safety risk mitigations. The BSSC reviews and reassess safety data outcomes to advise safety performance metrics and key performance indicators for continuous improvement.

The Safety Assurance process consists of the following sub-components:

- Safety Performance Monitoring and Measurement
- Management of Change
- Continuous Improvement

DTS implements its Safety Assurance Program through the active monitoring of operations, safety reporting systems, event notification, investigation and reporting, routine workplace observations, inspections, audits, evaluation and management of system modifications, facilitating committee meetings, and other activities designed to support safety oversight and performance monitoring.

6.1 Safety Performance Monitoring and Measurement

Safety Performance Monitoring and Measurement is critical to the Safety Assurance process. While Safety Risk Management leads to developing safety risk mitigation strategies, Safety Performance Monitoring and Measurement monitors the effectiveness of safety risk mitigations.

In accordance with 49 CFR 673.27(b), DTS and OTS carry out the following activities:

- Monitor the transit system for compliance with, and sufficiency of, procedures for bus and paratransit operations and maintenance;
- Monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- Conduct investigations of safety events to identify causal factors; and
- Monitor information reported through internal safety reporting programs.

6.1.1 Safety Data Acquisition, Collection and Analysis

Safety data acquisition, collection and analysis are essential components of the Safety Assurance process within SMS. These activities support the identification of safety risk trends and patterns in transit operations and help proactively manage safety risks before they result in safety events.

As part of the Safety Risk Management process, OTS utilizes safety data to identify potential safety concerns through techniques such as trend analysis, root cause analysis, and performance monitoring. This continuous feedback loop informs decision-making and supports the development of effective safety risk mitigations.

OTS has established methodologies for collecting, maintaining, analyzing, and distributing safety data to monitor and measure safety performance. These methodologies are designed to ensure data integrity, consistency, and relevance to both bus and paratransit services.

In coordination with OTS, DTS identifies all data reporting requirements from OTS. Examples of safety data collected include, but are not limited to:

- OTS Daily Logs (TransitMaster, Customer Service Reporting)
- Operator and supervisor reports
- Maintenance and inspection records
- Vehicle condition and defect reports
- Equipment failure reports
- Personnel training and certification records
- ESRP submissions
- Audit and compliance findings
- Event investigations and close-call/near miss reports
- Transit crime data

6.1.2 Rules Compliance

Operations and maintenance rules are reviewed on a regular basis through established methods to ensure all safety considerations are addressed and the process is documented. Additionally, OTS personnel are evaluated for rules compliance to assess competency. OTS is responsible for monitoring the system for compliance.

6.1.2.1 Review of Rules and Procedures

Rules and procedures governing TheBus and TheHandi-Van systems are reviewed by OTS management and supervisory personnel, at a minimum, annually. Reviews may also be triggered by events, audits, or regulatory changes.

Any revisions or updates to operational or safety policies, procedures or rules must be reviewed and approved by OTS Safety and Security prior to implementation.

6.1.2.2 Process for Ensuring Rules Compliance

OTS is required to conduct rules compliance evaluations on a weekly basis.

Positions subject to rules compliance evaluations include, but are not limited to:

- Operations Supervisors, Dispatchers and Operators
- Central Controllers
- Maintenance Supervisors, Mechanics, Technicians, Helpers and Storekeepers

OTS personnel who fail to demonstrate competency are required to attend refresher training.

6.1.2.3 Compliance Techniques

OTS evaluates compliance with rules, policies and procedures for operations and maintenance through:

- In- process and end-product checking by supervisors (including spot checks)
- Ride-alongs and field observations
- Toolbox talks and informal briefings
- Planned general inspections
- Booking-in procedures (e.g., start-of-shift check-ins)
- Drug and Alcohol Testing (planned and random)

6.1.2.4 Documentation

The OTS Director of Safety and Security compiles and reports results of rules and procedures inspections and corresponding corrective actions at the monthly BSSC meetings.

Relevant OTS documentation related to rules compliance (e.g., checklists, training records, and CAPs) are reviewed as part of the DTS Internal Safety Audit Program.

6.1.3 Safety-Related Facilities 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:

- Kalihi Maintenance Running Repair
- Kalihi Transportation and Administrative Offices
- Kalihi Unit Repair
- Paratransit Mixed-Use Facility
- Pearl City Maintenance
- Pearl City Transportation

6.1.3.1 Inspections

OTS performs preventive maintenance at pre-determined intervals based on the OTS Maintenance Plan and OEM specifications. The 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 safety of the system and sub-system equipment.

OTS 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 FTA by the DTS CSSO, as appropriate.

6.1.3.2 Audits

OTS must notify DTS in advance of all non-proprietary OTS audits and provide schedules and subsequent findings and reports, if requested. DTS reserves the right to attend any non-proprietary OTS audits.

Oversight audits of safety-related facilities and equipment are conducted by DTS as part of the DTS Internal Safety Audit Program to assess the proper implementation of the OTS maintenance program. In case of non-compliance, OTS would be required to prepare a CAP to remedy non-compliance findings, to be reviewed and approved by

DTS. OTS will provide CAP updates on a monthly basis at the BSSC meetings until closure.

6.1.4 Event Notification, Investigation, and Reporting

This section describes the processes used by DTS and OTS for safety and security event notification, investigation, and reporting.

6.1.4.1 Event Notification Procedures

All safety and security events throughout the bus and paratransit systems are reported to Central Control, and the OTS Field Operations Manager on duty ensures the information is recorded in the Central Control Log (i.e., TransitMaster). Events brought to the attention of any other control room staff must be reported by them to the OTS Field Operations Manager on duty. The OTS Field Operations Manager on duty notifies the OTS Director of Safety and Security of any event as soon as possible but no later than one hour.

The OTS Director of Safety and Security shall report safety and security events that meet the NTD Major Event Report thresholds to the DTS CSSO and the DTS Mass Transit Administrator (or designee) telephonically within two hours of awareness. For less severe events, notification may occur within 24 hours or by 5:00 p.m. on the next regular working day, whichever is sooner. Refer to Section 6.1.4.3.3 for the definition and criteria of Major Event Report thresholds.

OTS is responsible for recording and maintaining data for safety and security events. Specifically, the OTS Director of Safety and Security and the OTS Safety and Security 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 FTA when requested.

OTS is required to review and update as needed the OTS Event Notification Guidelines (OTS Field Operations SOG, Policy Number 3.03). DTS audits the OTS Event Notification Procedures as part of the DTS Internal Safety Audit Program.

6.1.4.2 Event Investigation Procedures

Investigations of safety and security events are conducted to identify causal factors. OTS is responsible for investigating any events that require notification to DTS. OTS is required to review and update as needed the OTS Event Investigation Guidelines (OTS Field Operations SOG, Policy Number 4.11). DTS audits the OTS Event Investigation Procedures as part of the DTS Internal Safety Audit Program. In the event there is a conflict of interest, DTS would conduct an independent investigation.

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

6.1.4.2.1 *Investigation Reports*

Within 48 hours of a reportable event, OTS 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.

OTS must prepare a final investigation report, including a description of investigation activities, findings, identified causal factors, and CAPs (if required), to be submitted to the DTS CSSO in an approved format and within 30 days of a reportable event unless granted an extension in writing. All supporting materials (audio/video files and relevant logs) are to be submitted to the DTS CSSO as part of the final investigation report.

OTS is responsible for submitting a monthly status update on all ongoing event investigations to the DTS CSSO. At a minimum, each monthly update includes:

- Summary of any meetings or discussions held regarding the investigation(s);
- Disclosure of immediate actions OTS has taken, planned, or completed;
- Principal issues or items currently being evaluated; and
- Overall progress and current status of each active investigation.

OTS is responsible for filing all event documentation in the system of record.

6.1.4.2.2 *Coordination with Outside Agencies*

The DTS CSSO is the primary point of contact to outside agencies (e.g., FTA, NTSB and HPD) for Safety and Security Event issues. All materials (audio/video files and relevant logs), which may be useful for investigation purposes and any other items relevant for clarification are to be made available upon request.

6.1.4.3 National Transit Database (NTD) Safety and Security Reporting

DTS is responsible for reporting safety and security events 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 a Full Reporter and provides NTD reports to FTA for both rail and non-rail transit services.

OTS is responsible for collecting transit-related safety and security data, as required, and provides monthly reports (stored in the MMIS system) to DTS. The DTS Internal Control Analyst within the Transportation Mobility Division (TMD) is accountable for the accurate and timely submission of the required monthly and annual NTD safety and security reports.

In the event of a safety or security event, which meets a Major Event Report threshold, OTS is required to report to the DTS TMD Internal Control Analyst within 24 hours for the purposes of NTD reporting. The DTS TMD Internal Control Analyst is responsible for the submission of Major Event Reports no later than 30 days after the date of the event.

The DTS TMD Internal Control Analyst submits transit-related safety and security data and reportable events which meet NTA reporting thresholds. The DTS TMD Internal Control Analyst is required to complete the appropriate NTD training to ensure accurate and compliant reporting.

The following sections summarize the NTD safety and security reporting requirements for non-rail modes.

6.1.4.3.1 *S&S-20: Safety and Security Chief Executive Officer Certification*

The DTS TMD Internal Control Analyst is responsible for ensuring the annual submission of the Safety and Security Chief Executive Officer Certification (S&S-20) by the DTS Director (Accountable Executive). The S&S-20 serves as DTS' confirmation that all the S&S data submitted is accurate for the previous calendar year. The DTS TMD Internal Control Analyst must ensure the DTS Director submits the S&S-20 for the previous calendar year for all modes 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.

6.1.4.3.2 *S&S-30: Security Configuration*

The Security Configuration (S&S-30) indicates the number and type of personnel that respond to security events or provide security on a transit agency's property.

DTS is required to complete the S&S-30 prior to entering data in any other S&S event report.

6.1.4.3.3 *S&S-40: Major Event Report*

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 or maintenance facility;

- 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;
- Deaths that are confirmed to be a result of illness, drug overdose or other natural causes, outside of a reportable event;
- Other events (assault, robbery, non-transit vehicle collisions, etc.) occurring at bus stops or shelters that are not on transit-owned property unless the event involves either a transit vehicle or a person boarding/alighting from a vehicle;
    - Bus stops or shelters owned by municipalities or authorities that also operate transit systems are not considered "transit-owned" property (see the most current annual *NTD Reporting Policy Manual* for more detail distinguishing bus stops from facilities)
- 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 events include, but are not limited to:

- Safety Events
    - Collisions (including those involving attempted suicide, suicide, and assault/homicide)
    - Fires (suppression)
    - Hazardous Material Spills
    - Acts of God
    - Other Safety Events (events that do not fall into any of the other categories, yet meet a reporting threshold *other than* immediate transport for medical attention for **one** person)

- System Security Events
  - Bomb Threat/Bombing
  - Chemical/Biological/Radiological/Nuclear Release
  - Arson
  - Sabotage
  - Burglary
  - Vandalism
  - Hijacking
  - Cybersecurity Events
  - Suspicious Package
  - Other System Security Events (such as projectiles thrown at vehicles)
- Personal Security Events
  - Assault (including Assault on a Transit Worker)
  - Attempted Suicide
  - Suicide
  - Homicide
  - Motor Vehicle Theft
  - Robbery
  - Rape
  - Larceny/Theft
  - Other Personal Security Events

Thresholds for automatic reportable major events include:

- Fatalities (confirmed within 30 days, includes suicides)
- Injuries (immediate transport away from the scene for medical attention for one or more persons)
- Estimated property damage equal to or exceeding $25,000
- Collisions that:

  - Meet an injury, fatality, property damage, or evacuation threshold;
  - Involves a transit revenue vehicle and the towing away of any vehicles (transit or non-transit) from the scene;
  - Include suicides, attempted suicides, assaults, or homicides resulting in an injury or fatality that involve contact with a transit vehicle; or
  - Includes collisions that do not involve a transit revenue vehicle but meet a threshold.
- Evacuation of a transit facility or vehicle for life-safety reasons

6.1.4.3.4 *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.

On the Non-Major Monthly Summary Report, DTS reports on the following three event type categories:

- **Non-Major Worker Assaults:** The number of assaults on a transit worker that occurred without injury (i.e., with no transport away from the scene for medical attention)
- **Other Safety Occurrences:** Safety incidents and the number of persons immediately transported away from the scene for medical attention each month due to those occurrences
- **Number of Non-Major Fires:** Fires with suppression that occurred without injury

The S&S-50 does not require details on specific people and vehicles involved for these events.

For TheHandi-Van paratransit mode providing door-to-door service, when an individual slips, trips, or falls walking to or from the transit vehicle and is injured (transported for medical attention), their injury is reportable on the Non-Major Monthly Summary Report as this is considered part of the boarding/alighting process.

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 that 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.

A reportable Non-Major Event is one that occurs:

- On transit right-of-way or infrastructure (the underlying framework or structures that support a public transportation system),
- At a transit revenue facility,
- At a maintenance facility,
- 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 at bus stops not on transit-owned property (unless the event involves a transit vehicle or boarding/alighting from a vehicle); and
- A person transported for mental health evaluation (for example, a person stating they would like to harm themselves where no attempt is made).

6.1.5 Internal Safety Audit Program

The DTS SSO conducts internal safety audits. DTS SSO-00002 Internal Audit Program Plan (IAPP) describes the responsibilities, audit processes and approach, and the process used to ensure planned and scheduled internal safety reviews are performed to evaluate compliance with the BASP.

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

6.1.5.1 Audit Process

Internal safety audits cover each section of the BASP over a three-year period. The DTS CSSO takes the lead in creating a schedule on which BASP components and sections are to be covered each year. Checklists are used in the audit, and the Lead Auditor prepares Final Audit Reports at the conclusion of the audit period to be reviewed and approved by the DTS CSSO.

DTS notifies auditees at least 30 days in advance of each internal audit and shares relevant audit checklists.

6.1.5.2 Audit Reporting

For each audit conducted, audit reporting consists of audit findings categorized as either 'Finding of Non-Compliance' or 'Observation with Recommendation'. Each 'Finding of Non-Compliance' has a CAP associated with it. Observations do not require formal CAPs, but the recommended actions are still recorded and tracked. The implementation status of these activities is monitored by the DTS CSSO and are documented and tracked as part of the CAP Log.

6.1.5.3 Three-Year Audit Schedule

Refer to Table 3 for the DTS Internal Safety Audit Program three-year audit schedule through June 30, 2028.

Table 3. DTS Internal Safety Audit Program Three-Year Audit Schedule

Audit Cycle	Audit Focus Areas
FY26 (7/1/2025 – 6/30/2026)	• **Safety Management Policy** o Policy Statement o BASP Policies o Goals and Objectives o Authorities, Accountabilities, and Responsibilities o BASP Implementation o Safety Plan Documentation o BASP Control and Update Procedures • **Safety Promotion** o Competencies and Training o Safety Communication o Emergency Management Program o Fitness for Duty o Hazard Communication Program
FY27 (7/1/2026 – 6/30/2027)	• **Safety Risk Management** o Safety Risk Management Process Overview o Safety Hazard Identification Process o Safety Risk Assessment Process o Safety Risk Mitigation Process o Safety Risk Documentation and Communication o Strategies to Minimize Exposure to Infectious Diseases
FY28 (7/1/2027 – 6/30/2028)	• **Safety Assurance** o Safety Performance Monitoring and Measurement o Management of Change o Continuous Improvement

6.1.6 Employee Safety Reporting Program

DTS requires an ESRP, which enables both employees and contractors to report safety and security issues without fear of retaliation. SMS and its Safety Assurance component are heavily dependent on an effective ESRP to collect critical safety information. Data collected through the ESRP is used to:

- Identify hazards;
- Assess performance of safety risk mitigation;
- Capture previously identified safety deficiencies; and
- Confirm the effectiveness of existing safety risk mitigations and that they are performing as intended.

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. All entities can report to OTS through hard-copy in-person, email, intranet reporting system, phone, radio, Central Control, and orally to OTS or DTS management. OTS produces ESRP reports which are transmitted to the DTS CSSO monthly.

DTS and OTS support both confidential and anonymous reporting as part of the overall ESRP, enabling employees and contractors to report safety and security issues without fear of reprisal. Confidential reports allow the reporter's identity to be known to designated safety and security personnel but are protected from broader disclosure. Anonymous reports do not include any identifying information. This information is included as part of the monthly ESRP report transmitted to the DTS CSSO.

The following areas are not covered under the ESRP:

- 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 TheBus or TheHandi-Van 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 through the ESRP, the following timetable has been established:

- Within 24 hours of receiving a report, DTS SSO or OTS personnel will acknowledge receipt of the report through a secure and/or confidential communication channel, depending on the nature of the report. Acknowledgement may be provided via phone, email, or in person.
- Within 7 days, DTS SSO or OTS personnel will conduct a preliminary review of the report and provide initial feedback through the same communication channel.
- Within 30 days, if further investigation is required, DTS SSO or OTS personnel will complete a detailed investigation and provide comprehensive feedback through the same communication channel.
- Within 45 days, DTS and/or OTS will implement any necessary actions based on the investigation and follow up with the reporter to ensure resolution, using the same communication channel.

For anonymous reports, DTS and/or OTS will review and act on the information to the extent possible, however, direct follow-up communication may not be feasible due to the lack of identifying information.

6.2 Management of Change

DTS and OTS have established a process for identifying and assessing changes that may introduce new hazards or impact the safety performance of TheBus and TheHandi-Van systems. When DTS or OTS determine that a proposed change could affect safety performance, the change is evaluated through the Safety Risk Management process.

MOC is a critical component of the Safety Assurance function. Its primary purpose is to ensure that any changes to the baseline system are reviewed for conformance and potential safety impacts before implementation. This includes identifying and assessing hazards associated with changes to documents, equipment, facilities, and systems.

Safety-critical elements subject to the MOC process and formal document control procedures include, but are not limited to policies, rules, PPWs, training materials, drawings and engineering reference documents, vehicles, equipment, and facilities.

Examples of changes that may trigger the MOC process include:

- Modifications to the service delivery model to meet new or increasing demands
- Revisions to procedures to improve efficiency or address new priorities
- Changes in staffing levels for specific job functions
- Organizational restructuring
- Introduction of new technology or equipment

- Proposed design changes to facilities, equipment, or vehicles
- Major service changes (e.g., redesign of a service segment)
- Accumulation of special instructions, notices, or bulletins
- Infrastructure improvements or right-of-way permit requests
- Policy updates

In accordance with 49 CFR 673.27(c), DTS and OTS carry out the following activities:

- Implementing a process for identifying and assessing changes that may introduce new hazards or impact bus and paratransit safety performance; and
- Evaluating proposed changes through the Safety Risk Management process if a proposed change is determined to potentially impact bus and paratransit safety performance.

6.2.1 System Modifications

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

This process assures that such modifications are reviewed to maintain system safety and prevent unintended consequences.

The modification process consists of:

- Identifying the responsibilities of the Project Manager (or equivalent) in submitting modification requests and supporting documentation;
- Ensuring compatibility with the existing system;
- Evaluating potential hazards through the Safety Risk 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;
- Establishing sign-off procedures to confirm involvement of all affected stakeholders;
- Reviewing and tracking all modification analyses through the BSSC; and
- Assigning and tracking CAPs to address and close out any identified hazards.

When a modification must be implemented, the following OTS functional areas are involved:

- **Safety and Security:** Reviews modification requests and ensures associated hazards are identified and managed. All functional areas have the responsibility to notify the OTS Training Department of the need for any updates to training materials resulting from the modification.
- **Engineering and Procurement:** Initiates modification requests, defines implementation methods and testing requirements, reviews test results (if applicable), updates all relevant documentation, and ensures modifications are tracked through the configuration management process.
- **Operations and Maintenance:** Coordinates with other functional areas for necessary work permits, updates O&M documentation, and ensures staff are re-trained as needed.

OTS Safety and Security is responsible for conducting safety and security reviews and approving all proposed changes, ensuring that each modification is thoroughly assessed for potential hazards. Modification analyses are presented to the BSSC to ensure appropriate CAPs are implemented and tracked to closure.

6.2.2 Configuration Management

OTS is responsible for the configuration management process to ensure all changes and modifications made to systems, operations, facilities, equipment, or other properties to include policies, procedures, and rules, are systematically planned, evaluated, controlled, approved by appropriate parties, and documented. The OTS Director of Safety and Security is responsible for ensuring that safety and security considerations are integrated into the decision-making process.

This process 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 completed prior to implementation; and
- All affected drawings, policies, rules, and PPWs are updated to support implementation.

6.2.3 Safety-Related Procurement Process and Procedures

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

As part of the OTS procurement process, contract documents issued to suppliers/vendors 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.

Proposed solutions from qualified suppliers/vendors are evaluated by OTS Safety and Security for compliance with safety principles and safety requirements prior to award.

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

- Items documented in Configuration Management and/or MMIS are procured from approved suppliers/vendors 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.

6.2.3.1 Coordination with the Safety Risk Management Process

The OTS procurement process is linked to the Safety Risk Management process through the application of safety hazard identification, risk assessment, and other processes as described elsewhere in the BASP.

The OTS Director of Safety and Security reviews the relevant procurement packages to ensure the following safety and security requirements are met:

- Safety analyses and security assessments are performed as required.
- Hazardous materials requirements are met including submission of Safety Data Sheets (SDS).
- Work zone safety 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 of the DTS CSSO.

6.3 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 BSSC to review SMS performance, reports, investigations, HTL and CAP Log, to include safety improvements. The committee tracks these improvements until they are fully implemented. In addition, the committee can direct reviews to evaluate safety risks and concerns and create and execute CAPs 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.

In accordance with 49 CFR 673.27(d), DTS and OTS carry out the following activities:

- Implementing a process to assess safety performance annually, including the identification of deficiencies in the SMS and SPTs;
- Monitoring safety performance against annual SRRP SPTs set by the BSSC;
- Conducting a safety risk assessment and implementing mitigations when annual SRRP SPTs set by the BSSC are not met, and allocating the following fiscal year's safety set-aside to eligible safety-related projects under 49 U.S.C. 5307; and
- Developing and carrying out, under the direction of the DTS Director (Accountable Executive), a plan to address any deficiencies identified through safety performance assessments.

6.3.1 Safety Performance Targets

Pursuant to 49 CFR 673.11(a)(3), DTS is required to set SPTs 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 SPTs that represent safety performance goals for the coming year for each mode of transit.

Table 4. Safety Performance Targets for Fixed-Route Bus

Safety Performance Measure	Description	Target
Major Events	This includes all safety and security major events as defined by NTD.	50

Major Event Rate (per 100K VRM)	This includes all safety and security major events as defined by NTD, divided by VRM.	0.269
Collision Rate (per 100K VRM)	This includes all collisions reported to NTD, divided by VRM.	0.200
Pedestrian Collision Rate (per 100K VRM)	This includes all collisions "with a person", as defined by NTD, divided by VRM.	0.024
Vehicular Collision Rate (per 100K VRM)	This includes all collisions "with a motor vehicle", as defined by NTD, divided by VRM.	0.180
Fatalities	This includes all fatalities as defined by NTD.	0
Fatality Rate (per 100K VRM)	This includes all fatalities as defined by NTD, divided by VRM.	0
Transit Worker Fatality Rate (per 100K VRM)	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.	110
Injury Rate (per 100K VRM)	This includes all injuries as defined by NTD, divided by VRM.	0.600
Transit Worker Injury Rate (per 100K VRM)	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.	0.009
Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD.	36
Rate of Assaults on Transit Workers (per 100K VRM)	This includes all assaults on transit workers as defined by NTD, divided by VRM.	0.180
System Reliability	This includes Major Mechanical System failures as defined by NTD, measured as the mean distance between major mechanical system failures.	13,399

Table 5. Safety Performance Targets for Non-Fixed-Route Bus

Safety Performance Measure	Description	Target
Major Events	This includes all safety and security major events as defined by NTD.	4
Major Event Rate (per 100K VRM)	This includes all safety and security major events as defined by NTD, divided by VRM.	0.071
Collision Rate (per 100K VRM)	This includes all collisions reported to NTD, divided by VRM.	0.057
Pedestrian Collision Rate (per 100K VRM)	This includes all collisions "with a person", as defined by NTD, divided by VRM.	0.000
Vehicular Collision Rate (per 100K VRM)	This includes all collisions "with a motor vehicle", as defined by NTD, divided by VRM.	0.043
Fatalities	This includes all fatalities as defined by NTD.	0
Fatality Rate (per 100K VRM)	This includes all fatalities as defined by NTD, divided by VRM.	0
Transit Worker Fatality Rate (per 100K VRM)	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.	8
Injury Rate (per 100K VRM)	This includes all injuries as defined by NTD, divided by VRM.	0.150
Transit Worker Injury Rate (per 100K VRM)	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.	0.027
Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD.	2

Rate of Assaults on Transit Workers (per 100K VRM)	This includes all assaults on transit workers as defined by NTD, divided by VRM.	0.043
System Reliability	This includes Major Mechanical System failures as defined by NTD, measured as the mean distance between major mechanical system failures.	13,597

Pursuant to 49 CFR 673.15(a), the DTS CSSO is responsible for sharing the annual SPTs with the Oahu Metropolitan Planning Organization (OahuMPO) in support of a performance-based State/regional planning process.

6.3.2 Bus Safety Steering Committee

In accordance with BIL revisions to 49 U.S.C. Section 5329(d), the Safety Committee for TheBus and TheHandi-Van is designated as the BSSC. The BSSC is responsible for overseeing the safety and security of both fixed-route bus and paratransit services.

The BSSC is composed of voting members from DTS and OTS and is established through a joint-labor management process. The committee includes an equal number of frontline transit worker representatives and management representatives from DTS and OTS, ensuring balanced input and collaboration.

The BSSC convenes monthly to:

- Maintain oversight of the agency's SMS and security performance.
- Review and approve revisions to the BASP.
- Identify and recommend risk-based mitigations or strategies to reduce the likelihood and severity of safety risks identified through the agency's safety risk assessment.
- Monitor the effectiveness of existing mitigations and identify any that are ineffective, inappropriate, or not implemented as intended.
- Identify safety deficiencies and opportunities for continuous improvement.

Additionally, the BSSC is responsible for:

- Sharing outcomes of safety and security event investigations.
- Reporting on the status of CAPs and mitigations.
- Presenting relevant safety and security performance data and statistics.
- Establishing and annually reviewing SRRP SPTs.

The BSSC strives to control safety and security risk better, detect and correct deficiencies earlier, share and analyze safety and security data more effectively, and measure SMS and security performance more accurately.

The BSSC ensures key SMS documentation is maintained, including but not limited to the CAP Log and HTL.

6.3.3 Transit Operations Safety Risk Reduction Program

Pursuant to the BIL revisions to 49 U.S.C. 5329(d), DTS established an SRRP 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 OTS has taken the following key steps to establish an SRRP for transit operations:

- Annual review and updates to the DTS BASP and OTS Agency Safety Plan.
- Establishment of the BSSC, with participation from frontline transit worker representatives in the decision-making process to better identify safety and security risks and implementing effective mitigation measures.
- Establishment of SRRP SPTs based on a three-year rolling average of data submitted to the NTD.
- OTS Emergency Response Training for events affecting bus and paratransit services such as fires, flooding, active shooters, seismic events, and road vehicle and other emergency events.

OTS, with DTS oversight, must implement continuous improvement activities and identify, document, and assess current safety risk reduction strategies and mitigations for effectiveness to assure they are performing as intended.

6.3.4 Safety Risk Reduction Program Safety Performance Targets

The BSSC is required to establish additional SPTs as part of the SRRP using a 3-year rolling average of the data submitted to NTD in accordance with the BIL revisions to 49 U.S.C. 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 SRRP SPTs reflect an annual reduction in the associated safety performance measure. To reflect an annual reduction, these SPTs are set below the three-year rolling average.

See Table 6 for the SRRP SPTs for Fixed-Route Bus (TheBus) and Table 7 for Non-Fixed-Route Bus (TheHandi-Van).

Table 6. 2025 Safety Risk Reduction Program Safety Performance Targets for Fixed-Route Bus

Required Safety Risk Reduction Program Measure	Description	Target
Major Events	This includes all safety and security major events as defined by NTD.	42
Major Event Rate (per 100K VRM)	This includes all safety and security major events as defined by NTD, divided by VRM.	0.234
Collisions	This includes all collisions reported to NTD.	36
Collision Rate (per 100K VRM)	This includes all collisions reported to NTD, divided by VRM.	0.199
Injuries	This includes all injuries as defined by NTD.	86
Injury Rate (per 100K VRM)	This includes all injuries as defined by NTD, divided by VRM.	0.477
Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD.	37
Rate of Assaults on Transit Workers (per 100K VRM)	This includes all assaults on transit workers as defined by NTD, divided by VRM.	0.200

Table 7. 2025 Safety Risk Reduction Program Safety Performance Targets for Non-Fixed-Route Bus

Required Safety Risk Reduction Program Measure	Description	Target
Major Events	This includes all safety and security major events as defined by NTD.	6
Major Event Rate (per 100K VRM)	This includes all safety and security major events as defined by NTD, divided by VRM.	0.091
Collisions	This includes all collisions reported to NTD.	5

Collision Rate (per 100K VRM)	This includes all collisions reported to NTD, divided by VRM.	0.087
Injuries	This includes all injuries as defined by NTD.	8
Injury Rate (per 100K VRM)	This includes all injuries as defined by NTD, divided by VRM.	0.130
Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD.	3
Rate of Assaults on Transit Workers (per 100K VRM)	This includes all assaults on transit workers as defined by NTD, divided by VRM.	0.043

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 SRRP SPTs 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 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 the following sub-components:

- Competencies and Training
- Safety Communication

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.

In addition to the two sub-components defined by the FTA, the following programs are integral to safety promotion efforts:

- Emergency Management Program
- Fitness for Duty
- Hazard Communication Program

7.1 Competencies and Training

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 bus and paratransit systems. 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.

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

OTS develops and maintains training programs that cover minimum safety and security requirements for all employees and contractors, including but not limited to de-escalation training. The OTS 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.

OTS 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.

7.1.1 OTS Employee Safety

All new employees receive basic health and safety training prior to receiving the in-depth system-specific training courses developed during initial orientation. Once assigned to a work location, location-specific safety training is provided as required.

7.1.2 Third Party Contractor Safety

OTS is responsible for providing familiarization training for third party contractors and to the CCH HFD, HPD, HESD, and security personnel.

7.1.3 Recordkeeping

During the entire lifecycle of the system, all information related to training is stored and managed by the OTS Training Department. The OTS Safety Department 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.

7.1.4 Compliance with Training Requirement

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

7.1.5 Testing of Operations & Maintenance Personnel

DTS and OTS supervisory personnel perform spot checks on employees to verify their knowledge of safety-critical responsibilities and proper failure management. For OTS employees, the results of each test are quantified, and a test score is recorded and entered in the employee's training record. 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, and if non-compliant, DTS advises OTS and at selected intervals performs follow-up inspections, or OTS advises DTS of remedial actions taken.

7.1.6 Public Transportation Safety Certification Training Program

Bus transit agency personnel and contractors who are directly responsible for safety oversight are not required but encouraged to participate in the Public Transportation Safety Certification Training Program (PTSCTP) provided by the Transportation Safety Institute and supported by the FTA.

Specifically, DTS and OTS staff directly responsible for the implementation of the BASP are encouraged to complete the following courses over a three-year period:

- SMS Awareness
- Safety Assurance
- SMS Principles for Transit
- Transit Bus System Safety
- Fundamentals of Bus Collision Investigation
- Effectively Managing Transit Emergencies

7.2 Safety Communication

The purpose of safety communication is to ensure that personnel are aware of the SMS program, convey safety critical information, explain why particular safety actions are taken, explain why safety procedures are introduced or changed, and to provide feedback on employee-reported hazards and safety concerns.

The following tools are utilized to support safety communication:

- Safety bulletins
- Safety notices/policies
- Posters
- Newsletters
- Briefings or toolbox talks
- Seminars and workshops
- Refresher training
- Intranet or social media

DTS and OTS 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, OTS 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 ESRP (e.g., hazard identification and reporting)
- Training on the safety risk management program (e.g., assessing the severity and likelihood of a potential consequence of a hazard)
- Training on when and how to report an emergency situation if they see something, and to call 9-1-1 in case of a real emergency

OTS is responsible for establishing protocols for communicating safety information to all employees throughout the system. OTS utilizes safety and security bulletins to distribute safety communication. DTS uses the BSSC and emails to distribute safety communication.

7.2.1 Lessons Learned Program

OTS maintains a Lessons Learned Program, which is reviewed and approved by DTS. The program includes creating and maintaining a list of lessons learned, which has significant findings, recommendations, and new insights realized. OTS, 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 lessons learned may come from safety reporting, event investigations, inspections, and audits. Lessons learned are evaluated and communicated through the BSSC.

OTS uses safety bulletins to transmit this information to employees, subcontractors, and DTS.

7.3 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 CSSO serves in the following capacity:

- Assists with the coordination with the OTS Director of Safety and Security, Joint Traffic Management Center, Honolulu Department of Emergency Management, HPD, HFD, and HESD, as needed.

- Inform the DTS Director (Accountable Executive) and DTS Mass Transit Administrator of updates to emergency management activities and conditions.

The following sections provide further details on how the DTS Continuity of Operations Plan (COOP) and the OTS EAP provides emergency preparedness and response procedures for bus and paratransit services.

7.3.1 DTS Continuity of Operations Plan

The DTS COOP is maintained to assist DTS and its transportation service providers in managing a serious disruptive event in a pre-planned, controlled, and structured manner. It provides details on communications in the event of degraded and/or emergency situations, plans to minimize system loss and disruption, procedures to be implemented before or during an event and recovery actions to be executed in response to a continuity event. The DTS COOP includes procedures to ensure the capability exists to continue essential functions across a wide range of potential emergencies or special events that preclude normal operating conditions for DTS, such as natural disasters (e.g., flooding, hurricanes, tsunamis, and loss of power), security threats or events, and major events in the DTS service area (e.g., significant events, large rallies or marches, etc.). The plan also identifies essential employees and lists the responsibilities and obligations for each.

7.3.2 OTS Emergency Action Plan

The OTS EAP includes procedures for managing emergencies on or affecting TheBus and TheHandi-Van infrastructure or premises. The OTS EAP 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 on OTS-controlled infrastructure shall comply with the OTS EAP and procedures to ensure emergencies are managed uniformly, appropriately and swiftly while minimizing the impact of the emergency to the greatest extent possible.

The OTS EAP does not supersede emergency procedures listed in the Bus Operator General Operating Procedures (GOP) or Field Operations SOG.

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

OTS is responsible for coordinating and planning emergency response with external agencies such as the HFD, HPD, HESD, and the Honolulu Department of Emergency Management, in coordination with DTS.

7.4 Fitness for Duty

Ensuring all bus and paratransit employees in safety-sensitive positions are physically and mentally fit to perform their duties is fundamental to DTS and OTS. The following programs and processes are implemented for the management of fitness for duty.

7.4.1 Drug and Alcohol Program

This section highlights the policies and procedures dealing with drug and alcohol abuse during the operations and maintenance of the bus and paratransit systems.

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

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

7.4.1.1 OTS Drug and Alcohol Program

The OTS Director of Human Resources has the overall responsibility to ensure the implementation and effectiveness of the OTS Drug and Alcohol Program.

OTS is responsible for establishing drug and alcohol policies and procedures reviewed and accepted by DTS.

OTS maintains a Drug and Alcohol Policy (OTS Personnel Policy 3.14) which was first established in 1978 and is continuously updated to keep it current and in compliance with the following Federal regulations:

- The Drug-Free Workplace Act of 1988 (49 CFR Part 32)
- Procedures for Transportation Workplace Drug and Alcohol Testing Programs (49 CFR Part 40)
- Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations (49 CFR Part 655)

Each employee is provided a sign 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

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

7.4.1.2 Over the Counter/Prescription Drugs & Fatigue Awareness

OTS is responsible for conducting over the counter/prescription drug and fatigue awareness training for all safety-sensitive employees.

7.4.1.3 Audits of Outside Agencies Responsible for Drug and Alcohol Testing

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

7.4.2 Medical Fitness and Fatigue Management

OTS maintains an Employee's Fitness for Duty Policy (OTS Field Operations SOG Policy 2.21) for medical fitness and fatigue management.

7.4.2.1 Medical Fitness

In addition to the requirements of 49 CFR Appendix F to Part 240, Medical Standards Guidelines for Hearing and Visual Acuity, OTS recognizes a number of medical conditions as job-related and consistent with business necessity for safety-sensitive positions. These include conditions that may cause:

- Sudden loss of consciousness
- Impairment of awareness or concentration
- Sudden incapacity
- Impairment of balance or coordination
- Significant limitation of mobility

Safety-sensitive employees are required to undergo medical examinations to establish their state of health and/or fitness to work at various times during their employment.

Safety-sensitive employees must report any medical condition or medication that may impair their ability to safely perform their duties.

7.4.2.2 Fatigue Management

Safety-sensitive employees are expected to report to work well-rested and alert. OTS supervisors are trained to recognize signs of fatigue and may remove employees from duty if necessary. OTS promotes scheduling practices that minimize fatigue risk.

Standards and limits applied to roster design and management will, as far as is reasonably practicable, take into account the following foreseeable causes of fatigue:

- Job design
- Workload and the working environment
- Shift systems
- Shift exchange
- Control of overtime
- On-call working
- Frequency of breaks
- Recovery time during periods of duty
- Nature and duration of time spent traveling

7.5 Hazard Communication Program

The purpose of the Hazard Communication Program is to control the hazards to human health and to control the pollution to the environment during the storage, handling/use, and disposal of hazardous materials.

OTS is responsible for implementing a Hazard Communication Program as it relates to materials purchased, handled, stored, and disposed of for the operations and maintenance of TheBus and TheHandi-Van systems. DTS is responsible for reviewing and conducting audits of the program as part of the DTS Internal Safety Audit Program.

At a minimum, the Hazard Communication Program consists of:

- Identifying the hazardous materials, as classified by the U.S. Environmental Protection Agency and the applicable Hawaii State and local regulations, which are used during the operations and maintenance of bus and paratransit services.

- Obtaining SDS 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 SDS
  - Safe handling and use of the 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 incidents

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CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

CERTIFICATE

RESOLUTION 25-317

Introduced:	11/13/25	By:	TOMMY WATERS - BY REQUEST	Committee:	INFRASTRUCTURE, TRANSPORTATION & TECHNOLOGY (ITT)

Title: APPROVING THE DEPARTMENT OF TRANSPORTATION SERVICES' AGENCY BUS AND PARATRANSIT AGENCY SAFETY PLAN PURSUANT TO 49 CFR PART 673 AND FEDERAL TRANSIT ADMINISTRATION REQUIREMENTS.

Voting Legend: * = Aye w/Reservations

11/13/25	INTRO	Introduced.
11/19/25	ITT	Reported out for adoption. CR-375 3 AYES: CORDERO, DOS SANTOS-TAM, WEYER 2 ABSENT: OKIMOTO, TUPOLA
12/03/25	CCL	Committee report and Resolution were adopted. 8 AYES: CORDERO, DOS SANTOS-TAM, KIA'ĀINA, NISHIMOTO, OKIMOTO, TULBA, TUPOLA, WATERS 1 ABSENT: WEYER

I hereby certify that the above is a true record of action by the Council of the City and County of Honolulu on this RESOLUTION.

GLEN I. TAKAHASHI, CITY CLERK

TOMMY WATERS, CHAIR AND PRESIDING OFFICER