



# **City of San Marcos**

## **Public Transportation Agency Safety Plan**

**Version 2**

**Adopted**

**In compliance with 49 CFR Part 673**

**Developed in conjunction with the  
Texas Department of Transportation**



## TABLE OF CONTENTS

<b>1. Executive Summary</b> .....	<b>5</b>
A. Plan Adoption – 673.11(a)(1) .....	6
B. Certification of Compliance – 673.13(a)(b) .....	6
<b>2. Transit Agency Information – 673.23(d)</b> .....	<b>7</b>
A. Authorities & Responsibilities – 673.23(d) .....	10
<b>3. Safety Policies and Procedures</b> .....	<b>11</b>
A. Policy Statement – 673.23(a) .....	11
I. Employee Safety Reporting Program – 673.23(b) .....	11
II. Communicating the Policy Throughout the Agency – 673.23(c) .....	12
B. PTASP Development and Coordination with TxDOT – 673.11(d) .....	13
C. PTASP Annual Review – 673.11(a)(5) .....	13
D. PTASP Maintenance – 673.11(a)(2)(c) .....	15
E. PTASP Documentation and Recordkeeping – 673.31 .....	15
F. Safety Performance Measures – 673.11(a)(3) .....	15
G. Safety Performance Target Coordination – 673.15(a)(b) .....	18
<b>4. Safety Management Systems – 673 subpart C</b> .....	<b>19</b>
A. Safety Risk Management – 673.25 .....	20
I. Safety Hazard Identification – 673.25(b) .....	21
II. Safety Risk Assessment – 673.25(c) .....	23
III. Safety Risk Mitigation – 673.25(d) .....	25
B. Safety Assurance – 673.27 (a) .....	26
I. Safety Performance Monitoring and Measuring – 673.27 (b) .....	27
II. Safety Event Investigation – 673.27(B)(3) .....	28
C. Safety Promotion – 673.29 .....	29
I. Safety Competencies and Training – 673.29(a) .....	30
II. Safety Communication – 673.29(b) .....	30
III. Infectious Disease Exposure .....	31
<b>5. Appendix A</b> .....	<b>32</b>
A. Glossary of Terms .....	32
B. Additional Acronyms Used .....	36
<b>6. Appendix B</b> .....	<b>38</b>



A.	City Council Minutes or Resolution.....	38
<b>7.</b>	<b>Appendix C.....</b>	<b>39</b>
A.	PURPOSE .....	39
B.	INTRODUCTION .....	39
C.	REQUIREMENTS .....	39
D.	PROCESS AND PROCEDURES.....	40
I.	Key Personnel .....	40
II.	Program Schedule.....	41
III.	Documentation.....	41
E.	SPECIFIC EMPLOYEE PROCEDURES/RESPONSIBILITIES .....	42
I.	Definition of Essential Services.....	42
II.	Posting of Directives .....	42
III.	Personal Protective Equipment (PPE).....	42
IV.	Vehicle and Facility Cleaning .....	42
V.	Vehicle and Facility Disinfecting .....	43
F.	Other Resources.....	43

**LIST OF FIGURES**

Figure 1:	City of San Marcos Organizational Chart .....	9
Figure 2:	Safety Management Systems.....	19
Figure 3:	Safety Risk Management Process .....	20
Figure 4:	Draft Risk Register.....	21
Figure 5:	Safety Risk Assessment Steps in Populating the Risk Register .....	24
Figure 6:	Safety Risk Assessment Matrix .....	25
Figure 7:	Risk Register Mitigation Component .....	26



## **LIST OF TABLES**

Table 1: Agency Information.....	8
Table 2: ASP Annual Update Timeline .....	14
Table 3: ASP Record of Changes .....	14
Table 4: NSP Safety Performance Measures.....	15
Table 5: Baseline 2019 Safety Performance Measures.....	16
Table 6: Fixed Route (Bus) Safety Performance Targets.....	17
Table 7: Demand Response Safety Performance Targets.....	18
Table 8: PTASP Supporting Documents .....	32



## 1. EXECUTIVE SUMMARY

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

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

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

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. At the City of San Marcos, all levels of management, administration and operations are responsible for the safety of their clientele and themselves. To improve public transportation safety to the highest practicable level in the State of Texas and comply with FTA requirements, the Texas Department of Transportation (TxDOT) has developed this Agency Safety Plan (ASP) in collaboration with the City of San Marcos.

To ensure that the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the NSP, the City of San Marcos adopts this ASP and the tenets of SMS including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance (SA), and Safety Promotion (SP), in accordance with 49 U.S.C. 5329(d)(1)(A).<sup>1</sup> While safety has always been a primary function at the City of San Marcos, this document lays out a process to fully implement an SMS over the next several years that complies with the PTASP final rule.

---

<sup>1</sup> Federal Register, Vol. 81, No. 24



### **A. Plan Adoption – 673.11(a)(1)**

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

Stephanie Reyes, City Manager

---

ACCOUNTABLE EXECUTIVE SIGNATURE

DATE

The San Marcos City Council formed an urban transit district as allowed under Chapter 458 of the Texas Transportation Code. The main governing body is the San Marcos City Council. Approval of this plan by the San Marcos City Council occurred on October 17, 2023 and is documented in Resolution 2023-78 from the City Council meeting.

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

TxDOT certifies on [DATE] that this Agency Safety Plan is in full compliance with 49 CFR Part 673 and has been adopted and will be implemented by the City of San Marcos as evidenced by the plan adoption signature and necessary City of San Marcos approvals under Section 1.A of this plan.



## **2. TRANSIT AGENCY INFORMATION – 673.23(D)**

The City of San Marcos (City) is governed by the San Marcos City Council (Council) which consists of seven council members. The Council enacts policies, adopts ordinances and resolutions, establishes the annual budget to provide services to the public, and sets the city tax, water, electric and wastewater rates for San Marcos. The City Council operates as a home rule municipal corporation under a City Charter adopted by the citizens of San Marcos. The San Marcos City Council formed the San Marcos urban transit district as allowed under Chapter 458 of the Texas Transportation Code. The City (Hays County), part of the City of Martindale (Caldwell County), and the unincorporated area of Redwood (Guadalupe County), together make up the San Marcos urbanized area (SM UZA). The City, through an interlocal agreement, contracts all transit operations and maintenance with the Capital Area Rural Transportation System (CARTS). The City, as the direct recipient, administers and plans transit operations in the SM UZA. Transit (“The Bus”) provided by CARTS on behalf of the City includes fixed route service, complementary paratransit, the senior shopper route, and the “1517” Interurban Express.

No additional transit service is provided by the City on behalf of another transit agency or entity at the time of the development of this plan.

Table 1 contains agency information, while an organizational chart for the City is provided in



Figure 1.

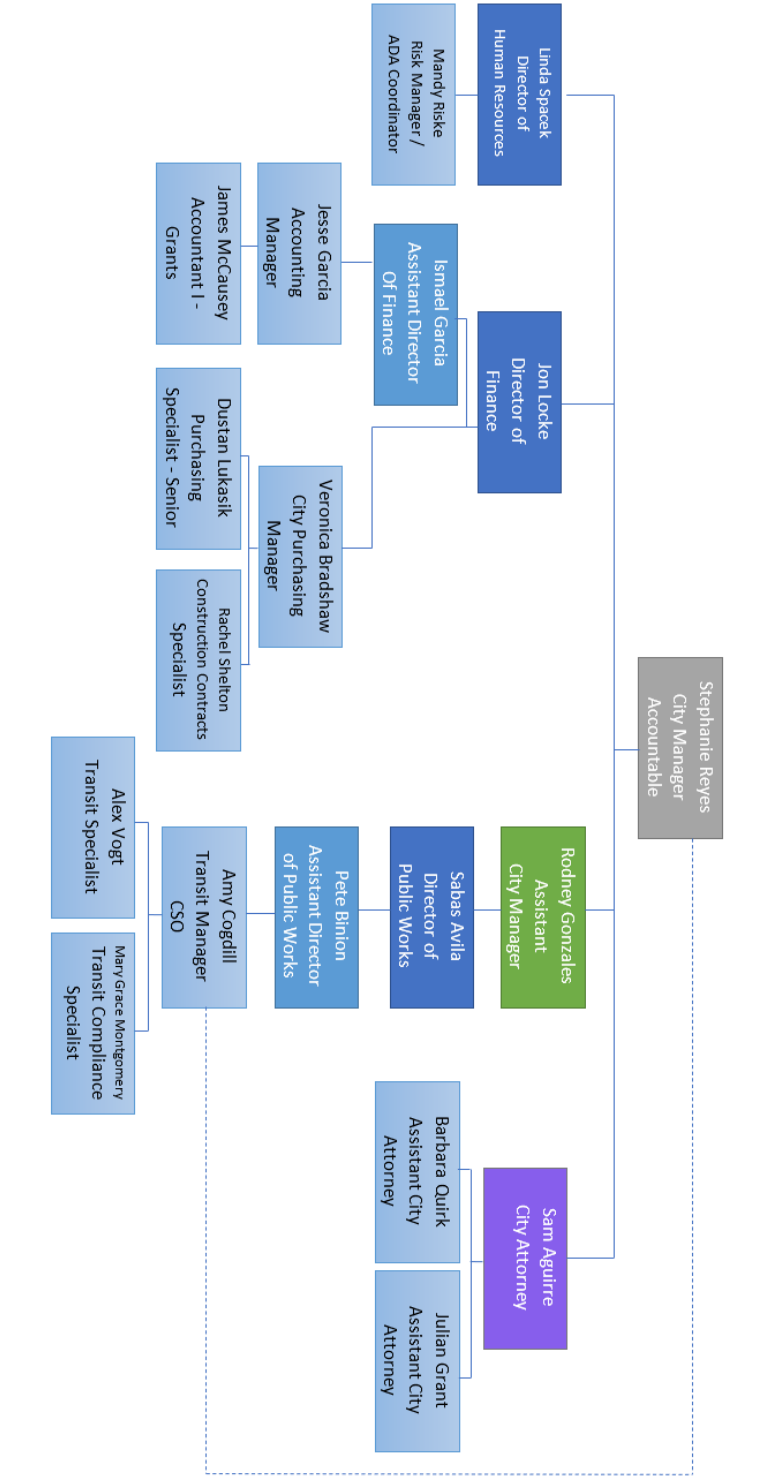
**TABLE 1: AGENCY INFORMATION**

Information Type	Information
Full Transit Agency Name	The City of San Marcos
Transit Agency Address	630 E. Hopkins St., San Marcos, TX 78666
Name and Title of Accountable Executive 673.23(d)(1)	Stephanie Reyes, City Manager
Name of Chief Safety Officer or SMS Executive 673.23(d)(2)	Amy Cogdill, Transit Manager
Key Staff	Mary Grace Montgomery, Transit Compliance Specialist Alex Vogt, Transit Specialist
Mode(s) of Service Covered by This Plan 673.11(b)	Fixed Route Bus & Demand Response & Commuter Bus
List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route Bus & Demand Response & Commuter Bus
Number of Vehicles Operated	14





FIGURE 1: CITY OF SAN MARCOS ORGANIZATIONAL CHART





## A. Authorities & Responsibilities – 673.23(d)

As stated in 49 CFR Part 673.23(d), the City of San Marcos, is establishing the necessary authority, accountabilities, and responsibilities for the management of safety amongst the key individuals within the organization, as those individuals relate to the development and management of our SMS. In general, the following defines the authority and responsibilities associated with our organization. Through the interlocal agreement between the City and CARTS, as the service provider, CARTS will implement the plan.

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

**Agency leadership and executive management** are those members of our agency leadership or executive management, other than the Accountable Executive, Chief Safety Officer (CSO)/SMS Executive, who have authority or responsibility for day-to-day implementation and operation of our agency's SMS.

The **CSO** is an adequately trained individual who has the authority and responsibility as designated by the Accountable Executive for the day-to-day implementation and operation of the City of San Marcos SMS. As such, the CSO is able to report directly to our transit agency's Accountable Executive.

**Key staff** are staff, groups of staff, or committees to support the Accountable Executive, CSO, or SMS Executive in developing, implementing, and operating our agency's SMS.

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

In addition, during the next year, the City will review our contractor's job descriptions and will ensure that job descriptions comply with 49 CFR Part 673.



### 3. SAFETY POLICIES AND PROCEDURES

#### A. Policy Statement – 673.23(a)

The City recognizes that the management of transit safety is a core value. The management team at the City will direct our transit contractor to embrace the SMS and commit to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our employees, customers, and the general public. All levels of management and frontline employees will be committed to safety and understand that safety is the primary responsibility of all employees.

The City and our service contractor are committed to:

- Communicating the purpose and benefits of the SMS to all staff, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.
- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.
- Ensuring that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.
- Establishing Safety Performance Targets (SPT) that are realistic, measurable, and data driven.
- Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.
- Reporting all Agency Safety Plan data required by the Federal Transit Administration

#### I. Employee Safety Reporting Program – 673.23(b)

Frontline employees are a significant source of safety data. These employees are typically the first to spot unsafe conditions that arise from unplanned conditions either on the vehicles, in the maintenance shop, or in the field during operations. For this reason, the Employee Safety Reporting Program (ESRP) is a major tenet of the PTASP Rule. Under this rule, agencies must establish and implement a process that allows employees to report safety conditions directly to senior management; provides protections for employees who report safety conditions to senior management; and includes a description of employee behaviors that may result in disciplinary action.



The City will direct our service contractor to have policies in place pertaining to the employee safety program. The City's current contractor CARTS has a set of policies in place within Section 2.06 of the *CARTS Employee Handbook* (Appendix A, Table 8 shows the document name, file name, and date of adoption) that state that employees may submit issues or safety concerns to the Board or General Manager in writing through their respective supervisor. Additionally, Section 10 of the *Employee Handbook*, called *Employee Responsibilities & Reports* and *Employee Suggestions*, contains policies that state that employees are expected to promptly report every on-the-job matter, no matter how minor, to their Supervisor. Employees are also to immediately report to their Supervisors any conditions that threaten the health and safety of employees or visitors. CARTS encourages all employees to make suggestions to their Supervisors. CARTS, under the direction of and in collaboration with the City, will continue to review and modify, if necessary, the *Employee Responsibilities & Reports* and *Employee Suggestions* to develop the procedures into a full ESRP to ensure that the procedures comply with 49 CFR Part 673.

In general, the City of San Marcos ESRP will ensure that all employees are encouraged to report safety conditions directly to senior management or their direct Supervisor for elevation to senior management. The policy will include any contract employees. The policy will also spell out what protections are afforded employees who report safety related conditions and will describe employee behaviors that are not covered by those protections. The policy will also elaborate on how safety conditions that are reported will be reported back to the initiator(s) – either to the individual or groups of individuals or organization, dependent on the nature of the safety condition.

To bolster the information received from frontline employees, CARTS, in consultation with the City, will also review its current policy for how its agency receives information and safety related data from employees and customers. If necessary, CARTS will develop additional means for receiving, investigating and reporting the results from investigations back to the initiator(s) – either to the person, groups of persons, or distributed agency-wide to ensure that future reporting is encouraged.

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

The transit management team of the City and our service provider CARTS is committed to ensuring the safety of our clientele, personnel and operations. Part of that commitment is developing an SMS and safety culture that reduces risk to the lowest level possible. The first step in developing a full SMS and safety culture is communicating our SMP to all parties involved.

The SMP and safety objectives are at the forefront of all communications. This communication strategy will include the continuation of Quarterly Safety Meetings to refresh transit employees on the safety policies, posting the policy in prominent work locations for existing transit employees and adding the policy statement to the on-boarding material for all new transit employees. In addition, the policy statement will become part of our transit contractor's regular safety meetings and other safety communications efforts. The policy will be signed by the Accountable Executive so that all transit employees know that the policy is supported by management.



## ***B. PTASP Development and Coordination with TxDOT – 673.11(d)***

This PTASP has been developed by TxDOT on behalf of Capital Area Metropolitan Planning Organization (MPO) and the City of San Marcos in accordance with all requirements stated in 49 CFR Part 673 applicable to a small public transportation provider. TxDOT mailed a formal call for participation in a State sponsored PTASP development process to all Texas Section 5307 small bus transit agencies on January 15, 2019 and followed that call with a series of phone calls and additional correspondence. CARTS provided a letter to TxDOT opting into participation on March 15, 2019 and the City of San Marcos provided a letter to TxDOT opting into participation on September 4, 2019 and both entities have been active participants in the development of this plan through sharing existing documentation and participating in communication and coordination throughout the development of this plan. CARTS has provided documentation used in the development of this plan is presented in Table 8, in Appendix A.

In support of tracking performance on our SA and SP processes, the City will direct our service provider to conduct a yearly safety culture survey. This survey is intended to help the City assess how well our service provider communicates safety and safety performance information throughout its organization by gauging how safety is perceived and embraced by our contractor's administrators, supervisors, staff. The survey is designed to help assess how well the conveyance of safety information on hazards and safety risks relevant to employees' roles and responsibilities and informing employees of safety actions taken in response to reports submitted through our ESRP. Results from the most recent survey were analyzed and incorporated into the implementation strategies contained in this ASP.

Once the documents were reviewed, an on-site interview was conducted with CARTS to gain a better understanding of the agency. This understanding was necessary to ensure that the ASP was developed to fit the specifics of the transit program in the San Marcos urbanized area.

The draft ASP was delivered to CARTS and the City in March 2020 for review and comment. Once review was completed and any adjustments made, the final was delivered to the City of San Marcos for review and adoption.

## ***C. PTASP Annual Review – 673.11(a)(5)***

In accordance with 49 U.S.C. 5329(d)(1)(D), this plan includes provisions for annual updates of the SMS. As part of the City's ongoing commitment to fully implementing the transit SMS and engaging our contractor's transit employees in developing a robust safety culture, the City in consultation with our contractor, will review the ASP and all supporting documentation annually. The review will be conducted as a precursor to certifying to FTA that the ASP is fully compliant with 49 CFR Part 673 and accurately reflects the agency's current implementation status. Certification will be accomplished through the City of San Marcos' annual Certifications and Assurances reporting to FTA.



The annual review will include the ASP and transit supporting documents from the City’s service provider (Standard Operating Procedures [SOP], Policies, Manuals, etc.) that are used to fully implement all the processes used to manage transit safety for the San Marcos urbanized area. All changes will be noted (as discussed below) and the Accountable Executive will sign and date the title page of this document and provide documentation of approval by the San Marcos City Council whether by signature or by reference to resolution.

The annual ASP review will follow the update activities and schedule provided below in Table 2. As processes are changed to fully implement SMS or new processes are developed, the City’s transit management will track those changes for use in the annual review.

**TABLE 2: ASP ANNUAL UPDATE TIMELINE**

Task	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept
Rereview Agency Operations	→							
Rereview SMS Documentation <ul style="list-style-type: none"> <li>• Safety Policy;</li> <li>• Risk Management;</li> <li>• Safety Assurance; and</li> <li>• Safety Promotion.</li> </ul>		→						
Rereview Previous Targets and Set or Continue Targets			→					
Report Targets to National Transit Database (NTD), TxDOT, Capital Area MPO					→			
Make Any Necessary Adjustments to PTASP						→		
Update Version No., Adopt & Certify Plan Compliance								★

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

**TABLE 3: ASP RECORD OF CHANGES**

Document Version	Section/Pages Changed	Reason for Change	Reviewer Name	Date of Change
3	Pg. 8	Update of org chart	Amy Cogdill	07/24/2024
3	Safety Performance Measures	Annual update	Amy Cogdill	07/24/2024

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



### **D. PTASP Maintenance – 673.11(a)(2)(c)**

Transit management of the City, in consultation with our service provider, will follow the annual review process outlined above and adjust this ASP as necessary to accurately reflect current implementation status. This plan will document the processes and activities related to transit SMS implementation as required under 49 CFR Part 673 Subpart C and will make necessary updates to this ASP as the City continues to develop, refine, and direct our service provider to implement transit SMS.

### **E. PTASP Documentation and Recordkeeping – 673.31**

At all times, the City of San Marcos and our transit service provider will maintain documents set forth in the City’s ASP, including those documents related to the implementation of the SMS and those documents related to the results from SMS processes and activities. The City will also maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that are used to carry out the transit ASP and all iterations of those documents. These documents will be made available upon request to the FTA, other Federal entity, or TxDOT. The City will maintain these documents for a minimum of three years after the documents are created. These additional supporting documents are cataloged in Appendix A and the list will be kept current as a part of the annual transit ASP review and update.

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

The PTASP Final Rule, 49 CFR Part 673.11(a)(3), requires that all public transportation providers develop an ASP to include SPT’s based on the safety performance measures established under the NSP. The safety performance measures outlined in the NSP were developed to ensure that the measures can be applied to all modes of public transportation and are based on data currently being submitted to the NTD. The safety performance measures included in the NSP are fatalities, injuries, safety events, and system reliability (State of Good Repair as developed and tracked in the TAM Plan).

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

**TABLE 4: NSP SAFETY PERFORMANCE MEASURES**

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

Table 5 presents baseline numbers for each of the performance measures.



**TABLE 5: BASELINE 2023 SAFETY PERFORMANCE MEASURES**

Mode	Fatalities	Rate of Fatalities*	Injuries	Rate of Injuries*	Safety Events	Rate of Safety Events*	Mean Distance Between Major Mechanical Failure
Fixed Route (Bus)	0	0.00000	0	0.00000	0	0.00000	43,719.9
Demand Response	0	0.00000	0	0.00000	0	0.00000	20,232.5

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

While safety has always been a major component of the San Marcos urbanized area transit operation, the adoption of this ASP will result in changes across all aspects of the transit program. The SPT's set in Table 6 and





Table 7 reflect an acknowledgment that SMS implementation will produce new information that will be needed to accurately set meaningful SPT's. We will set the targets at the current NTD reported five-year average as the transit program begins the process of fully implementing the SMS and developing the targeted safety improvements. This will ensure the transit program performs no worse than the baseline performance over the last five years.

**TABLE 6: FIXED ROUTE (BUS) SAFETY PERFORMANCE TARGETS**

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities*	0.00000	0.00000
Injuries	0	0
Rate of Injuries*	0.00000	0.00000
Safety Events	0	0
Rate of Safety Events*	0.00000	0.00000
Mean Distance Between Major Mechanical Failure	43,719.9	43,719.9

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



**TABLE 7: DEMAND RESPONSE SAFETY PERFORMANCE TARGETS**

Mode	Baseline	Target
Fatalities	0	0
Rate of Fatalities*	0.00000	0.00000
Injuries	0	0
Rate of Injuries*	0.00000	0.00000
Safety Events	0	0
Rate of Safety Events*	0.00000	0.00000
System Reliability	20,232.5	20,232.5
Other	N/A	N/A

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

As part of the annual review of the ASP, the City of San Marcos, in consultation with the service provider, will reevaluate our SPT's and determine whether the SPT's need to be refined. As more data is collected as part of the SRM process discussed later in this plan, the City, in consultation with the service provider, may begin developing safety performance indicators to help inform management on safety related investments.

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

The City will make our SPT's available to TxDOT and the Capital Area MPO to aid in those agencies' respective regional and long-range planning processes. To the maximum extent practicable, the City will coordinate with TxDOT and Capital Area MPO in the selection of State and MPO SPT's as documented in the Interagency Memorandum of Understanding (MOU).

Each year during the FTA Certifications and Assurances reporting process, the City of San Marcos will transmit any updates to our SPT's to both the Capital Area MPO and TxDOT (unless those agencies specify another time in writing).



## 4. SAFETY MANAGEMENT SYSTEMS – 673 SUBPART C

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

SMS is comprised of four basic components - SMP, SRM, SA, and SP. The SMP and SP are the enablers that provide structure and supporting activities that make SRM and SA possible and sustainable. The SRM and SA are the processes and activities for effectively managing transit safety as presented in Figure 2.

FIGURE 2: SAFETY MANAGEMENT SYSTEMS





Implementing SMS for the City of San Marcos' transit program will be a major undertaking over the next several years. This ASP is the first step to putting in place a systematic approach to managing the transit program's risk. The City has already taken several steps to implement SMS, such as developing this initial transit ASP and designating a CSO. During the first year of implementation, the City of San Marcos, in consultation with the service provider, will identify transit SMS roles and responsibilities and key stakeholder groups, identify key staff to support implementation, and ensure the identified transit staff receive SMS training. The City of San Marcos, in consultation with the service provider, will also develop a plan for implementing transit SMS, inform stakeholders about the ASP, and discuss our progress toward implementation with the San Marcos City Council and the City's transit planning partners as applicable.

### A. Safety Risk Management – 673.25

By adopting this transit ASP, the City of San Marcos, in continuation with our service provider, is maintaining the transit SRM process presented in Figure 3 for identifying hazards and analyzing, assessing and mitigating safety risk in compliance with the requirements of 49 CFR Part 673.25. The SRM processes described in this section are designed to implement the City's transit program SMS.

FIGURE 3: SAFETY RISK MANAGEMENT PROCESS



The continued implementation of the SRM component of the SMS will be carried out over the course of the next year. Any SRM components missing will be implemented through consultation with the service provider. The SRM components will be implemented through a program of improvement during which the SRM processes will be implemented, reviewed, evaluated, and revised, as necessary, to ensure the processes are achieving the intended transit safety objectives as the processes are fully incorporated into the City's transit program SOPs.

The SRM is focused on implementing and improving actionable strategies that the City's transit management team and service provider have undertaken to identify, assess and mitigate risk on behalf of the San Marcos urbanized area. The creation of a Risk Register provides an accessible resource for documenting the SRM process, tracking the identified risks, and documenting the effectiveness of



mitigation strategies in meeting defined transit safety objectives and performance measures. The draft Risk Register is presented in Figure 4.

**FIGURE 4: DRAFT RISK REGISTER**

Hazard	Type	Likelihood	Consequence	Resolution

What is wrong?

What could happen?

What could mitigate this?

As the SRM process progresses through the steps of identifying what may be wrong, what could happen as a result, and what steps the City’s transit program is taking to resolve the risk and mitigate the hazard, the transit CSO completes and publishes the various components of the Risk Register. These components include the use of safety hazard identification, safety risk assessment, and safety risk mitigation, as described in the following sections.

**I. Safety Hazard Identification – 673.25(b)**

The San Marcos urbanized area transit service provider currently practices safety hazard identification through the communications and reporting policies discussed in the ESRP (Section 3.A.I), found in Sections 2 and 10 of the *CARTS Employee Handbook* (Appendix A). The policies and procedures encourage all CARTS employees to report and identify all safety hazards no matter the scale. Matters are requested to be brought forth to supervisors, however, written concerns can be submitted to the General Manager and the CARTS Board of Directors, if necessary, and will be documented and submitted to the City, as applicable.

Although the current procedures have been effective in achieving the safety objectives, to ensure compliance with 49 CFR Part 673, the City, in consultation with our service provider, is working to implement the following expanded transit SRM process.

The City’s transit SRM process is a forward-looking effort to identify safety hazards that could potentially result in negative safety outcomes. In the SRM process, a hazard is any real or potential condition that



can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or, damage to the environment.

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

- Through training and reporting procedures, the City's service provider ensures personnel can identify hazards and that each employee clearly understands that the employee has a responsibility to immediately report any safety hazards identified to the employee's supervisors. Continued training helps employees to develop and improve the skills needed to identify hazards.
- Employee hazard training coupled with the ESRP ensures that the City's service provider has full use of information from frontline employees for hazard identification.
- Upon receiving the hazard report, the City's service provider's supervisors communicate the identified hazard to the CSO for entry into the risk register for risk assessment, classification and possible mitigation.
- In carrying out the risk assessment, the CSO uses standard reporting forms (e.g. *Pre-and Post-Trip Inspection Forms* and *Preventative Maintenance (PM) Inspections* to mitigate mechanical based safety hazards that are identified) and other reports completed on a routine basis by administrative, operations and maintenance. The City's service provider's *Maintenance Plan and Training Requirements* (Appendix A) documents contain procedures for flagging and reporting hazards as a part of day-to-day operations.
- The City's service provider's supervisors are responsible for performing and documenting regular safety assessments, which include reporting and recommending methods to reduce identified hazards.
- The City's service provider uses incident reports and records to determine specific areas of training that need to be covered with employees to ensure safety hazard identification is continually improved, and thus ensure that hazards are identified before an event recurrence.
- Incident reports are also analyzed by the City's service provider's risk management team to identify any recurring patterns or themes that would help to identify underlying hazards and root causes of the event that can be mitigated to prevent recurrence.
- If a hazard is such that a transit employee would be reluctant to report the information due to perceived negative consequences (e.g. disciplinary action), alternative, anonymous reporting



mechanisms are available through an anonymous suggestion box or anonymous online reporting form, or other secure mechanism.

- To increase the safety knowledge of the service provider’s staff, the CSO, risk management personnel and subject matter experts are also encouraged to participate in available professional development activities and peer-to-peer exchanges as a source of expertise and information on lessons learned and best practices in hazard identification.
- Other sources for hazard identification include:
  - ESRP
  - Inspections of personnel job performance, vehicles, facilities and other data
  - Investigations of safety events
  - Safety trend analysis on data currently collected
  - Training and evaluation records
  - Internal safety audits
  - External sources of hazard information could include:
    - FTA and other federal or state authorities
    - Reports from the public
    - Safety bulletins from manufacturers or industry associations

In addition to identifying the hazard, the hazard identification process also classifies the hazard by type (organizational, technical or environmental) to assist the CSO in identifying the optimal combination of departmental leadership and subject matter expertise to select in assembling the safety risk assessment team.

The various hazard types can also be categorized by subcategory for each type. For example, organizational hazards can be subcategorized into resourcing, procedural, training or supervisory hazards. Each of the subcategories implies different types of mitigation strategies and potentially affect overall agency resources through varying costs for implementation. Technical hazards can be subcategorized into operational, maintenance, design and equipment. Additionally, environmental hazards can be subcategorized into weather and natural, which is always a factor for every operation.

## II. Safety Risk Assessment – 673.25(c)

As part of the transit SRM process, the City of San Marcos, in consultation with our service provider, has developed methods to assess the likelihood and severity of the consequences of identified hazards, and prioritizes the hazards based on the safety risk. The process continues the use of the Risk Register described in the previous section to address the next two components.

To accurately assess a risk, the City of San Marcos, in consultation with our service provider, may need to perform an investigation. The City’s service provider currently investigates accidents or crashes but



will need to develop a full investigation procedure, in consultation with the City, to inform the transit SRM process. The investigation procedure will be developed to cover all risk assessment. Once fully developed, the document will become the Investigation SOP. The SOP will include accident investigation procedures as well as risk investigation procedures. These procedures will be used to investigate risks identified from multiple sources including the ESRP.

Transit safety risk is based on an assessment of the likelihood of a potential consequence and the potential severity of the consequences in terms of resulting harm or damage. The risk assessment also considers any previous mitigation efforts and the effectiveness of those efforts. The results of the assessment are used to populate the third and fourth components of the Risk Register as presented in Figure 5.

FIGURE 5: SAFETY RISK ASSESSMENT STEPS IN POPULATING THE RISK REGISTER

Hazard	Type	Likelihood	Consequence	Resolution

The transit risk assessment is conducted by the CSO, in consultation with the service provider, supplemented by subject matter experts as applicable. The process employs a safety risk matrix, similar to the one presented in Figure 6, that allows the CSO to visualize the assessed likelihood and severity, and to help understand when actions are necessary to reduce or mitigate safety risk.





FIGURE 6: SAFETY RISK ASSESSMENT MATRIX

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

Although the current version of the matrix relies heavily on the examples and samples that are listed on the PTASP Technical Assistance Center website, lessons learned from the implementation process during the coming years will be used to customize the matrix that the City will use to address the unique transit operating realities and transit leadership guidance.

The Risk Assessment Matrix is an important tool. If a risk is assessed and falls within one of the red zones, the risk is determined to be unacceptable under existing circumstances. This determination means that management must take action to mitigate the situation. This is the point in the process when transit SRMs are developed. If the risk is assessed and falls within one of the yellow zones, the risk is determined to be acceptable, but monitoring is necessary. If the risk falls within one of the green zones, the risk is acceptable under the existing circumstances.

Once a hazard’s likelihood and severity have been assessed, the CSO, in consultation with the service provider, enters the hazard assessment into the Risk Register that is used to document the individual hazard and the type of risk it represents. This information is used to move to the next step, which is hazard mitigation.

### III. Safety Risk Mitigation – 673.25(d)

Upon completion of the risk assessment, the CSO, in consultation with the service provider, continues populating the Risk Register by identifying mitigations or strategies necessary to reduce the likelihood and/or severity of the consequences. The goal of this step is to avoid or eliminate the hazard or, when elimination is not likely or feasible, to reduce the assessed risk rating to an acceptable level (Figure 7). However, mitigations do not typically eliminate the risk entirely.



**FIGURE 7: RISK REGISTER MITIGATION COMPONENT**

Hazard	Type	Likelihood	Consequence	Resolution

To accomplish this objective, the CSO, in consultation with the service provider works with transit subject matter experts. The risk management team then conducts a brainstorming exercise to elicit feedback from transit staff and supervisors with the highest level of expertise in the components of the hazard.

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

Once a mitigation strategy is selected and adopted, the strategy is assigned to an appropriate staff member or team for implementation. The assigned personnel and the personnel’s specific responsibilities are entered into the Risk Register. Among the responsibilities of the mitigation team leader is the documentation of the mitigation effort, including whether the mitigation was carried out as designed and whether the intended safety objectives were achieved. This information is recorded in the appendix to the Risk Register for use in subsequent SA activities and to monitor the effectiveness of the SRM program.

**B. Safety Assurance – 673.27 (a)**

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

SA helps to ensure early identification of potential safety issues. SA also ensures that safeguards are in place and are effective in meeting the San Marcos transit programs’ critical safety objectives and contribute towards SPT’s.



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

The City of San Marcos, in conjunction with the service provider, collects and monitors data on safety performance indicators through a variety of mechanisms described in the following sections. Safety performance indicators can provide early warning signs about safety risks. The City's service provider currently relies primarily on lagging indicators representing negative safety outcomes that should be avoided or mitigated in the future. However, initiatives are underway to adopt a more robust set of leading indicators that monitor conditions that are likely to contribute to negative outcomes in the future. In addition to the day-to-day monitoring and investigation procedures detailed below, the City, in consultation with our service provider, will review and document the safety performance monitoring and measuring processes as part of the annual update of this ASP.

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

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

The City's service provider's supervisors monitor employee compliance with San Marcos urbanized area SOPs through direct observation and review of information from internal reporting systems such as the *Employee Suggestions* procedures, provided in Section 10 of the *CARTS Employee Handbook*, from both employees and customers.

The City in consultation with our service provider addresses non-compliance with standard procedures for operations and maintenance activities through a variety of actions, including revision to training materials and delivery of employee and supervisor training if the non-compliance is systemic. If the non-compliance is situational, then activities may include supplemental individualized training, coaching, and heightened management oversight, among other remedies.

Sometimes personnel are fully complying with the procedures, but the operations and maintenance procedures are inadequate and pose the risk of negative safety outcomes. In this case, the cognizant person submits the deficiency or description of the inadequate procedures to the SRM process. Through the SRM process, the SRM team will then evaluate and analyze the potential organizational hazard and assign the identified hazard for mitigation and resolution, as appropriate. The SRM team will also conduct periodic self-evaluation and mitigation of any identified deficiencies in the SRM process itself.

### MONITORING OPERATIONS – 673.27(B)(2)

The City's service provider's management is required to monitor investigation reports of safety events and SRM resolution reports to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or not implemented as intended. If it is determined that the safety risk mitigation did not bring the risk to an acceptable level or otherwise failed to meet safety objectives,



then the transit provider's management resubmits the safety risk/hazard to the SRM process. The CSO will work with transit service management and subject matter experts to reanalyze the hazard and consequences and identify additional mitigation or alternative approaches to implementing the mitigation.

## II. Safety Event Investigation – 673.27(B)(3)

The City's transit service provider currently conducts investigations of safety events. From an SA perspective, the objective of the investigation is to identify causal factors of the event and to identify actionable strategies that the City's service provider can employ to address any identifiable organizational, technical or environmental hazard at the root cause of the safety event. To ensure compliance with 49 CFR Part 673, the City in collaboration with our service provider is working to implement the following SRM.

Safety Event Investigations that seek to identify and document the root cause of an accident or other safety event are a critical component of the SA process because they are a primary resource for the collection, measurement, analysis and assessment of information. The City's transit service provider gathers a variety of information to help identify and document root causes of accidents and incidents, including but not limited to the following process based on the FTA's Model Bus Safety Program:

1. Obtain from the Operator the following information:
  - a. The location of the incident and what direction they were traveling (inbound or outbound); if in station, indicate the situation.
  - b. The bus number and the route that they are on.
  - c. If there are injuries, describe how serious they appear (don't be too graphic, just generalize).
  - d. Information about any other vehicles or pedestrians involved and their descriptions.
2. Remind the operator of the safety procedures:
  - a. Turn on 4-way flashers. Place traffic warning devices (orange triangles).
  - b. Recheck anyone with injuries, do not move the seriously injured.
  - c. Render comfort and aid to anyone injured, as may be appropriate.
  - d. Evacuate the bus, if necessary.
  - e. Keep the two-way radio on and monitored.
  - f. Hand out courtesy cards to the passengers and to any witnesses.
  - g. Move the vehicle to the side of the road unless it is inoperable.
3. Notify the following:
  - a. Call the police. Call Emergency Medical Personnel (EMP) 911
  - b. Notify/call immediate supervisor on duty at the time, or Director of Operations if the supervisor is not available.
4. The City's service provider's supervisor in consultation with management will:
  - a. Determine whether the CSO, General Manager or others need to be contacted but will give them a report when the supervisor finishes the initial assessment.



- b. Let the Operator know that police and supervision have been contacted and help is on the way.
  - c. Assign a Standby Operator to pre-trip a bus in case a standby must drive the next round for the operator on that route. When needed, the Standby Operator may take a bus out to continue a route.
  - d. Let the Operator know that a Standby Operator and bus have been assigned to continue the route or that support personnel are bringing another bus out to them.
  - e. Refer the operator for required drug and alcohol testing in compliance with 49 CFR § 655.44 Post-accident testing, if the safety event meets the definition of accident in 49 CFR § 655.4
  - f. Return to the station.
  - g. Record all accident information on the Daily Dispatch log, any missed trips, downtime, or bus change outs.
5. The City's transit service provider in consultation with the CSO, working with content specialists, evaluates the incident report and other available information to determine the root cause of the accident/event. Follow up with driver or other cognizant parties may be necessary to elicit additional information.
  6. The City's transit service provider in consultation with the CSO identifies any hazards noted in the incident report and refers those hazards to the SRM process.

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

As a primary part of the internal safety reporting program, the City and our service provider monitor information reported through the ESRP. When a report originating through the complaint process documents a safety hazard, the City's service provider's supervisor submits the hazards identified through the internal reporting process, including previous mitigation in place at the time of the safety event. The City's service provider's supervisor submits the hazard report to the SRM process to be analyzed, evaluated, and if appropriate, assigned for mitigation/resolution.

#### OTHER SAFETY ASSURANCE INITIATIVES

Because leading indicators can be more useful for safety performance monitoring and measurement than lagging indicators, the City and our service provider will be undertaking efforts to implement processes to identify and monitor more leading indicators or conditions that have the potential to become or contribute to negative safety outcomes. This may include trend analysis of environmental conditions through monitoring National Weather Service data; monitoring trends toward or away from meeting the identified SPT's; or other indicators as appropriate.

### C. Safety Promotion – 673.29

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



the City of San Marcos and our service provider, will implement and how safety related information will be communicated.

### **I. Safety Competencies and Training – 673.29(a)**

The City's transit service provider provides comprehensive training to all employees regarding each employee's job duties and general responsibilities. This training includes safety responsibilities related to the employee's position. In addition, regular driver safety meetings are held to ensure that safety related information is relayed to the key members of the service provider's safety processes.

As part of SMS implementation, the City's service provider does:

- Conduct a thorough review of all current general staff categories (administrative, driver, supervisor, mechanic, maintenance, etc.) and the respective staff safety related responsibilities.
- Assess the training requirements spelled out in 49 CFR Part 672 and the various courses required for different positions. (The City's transit program is not subject to the requirements under 49 CFR Part 672 but will review the training requirements to understand what training is being required of other larger agencies in the event these trainings might be useful).
- Assess the training material available on the FTA PTASP Technical Assistance Center website.
- Review other training material available from industry sources such as the Community Transportation Association of America and the American Public Transportation Association websites.
- Develop a set of competencies and trainings required to meet the safety related activities for each general staff category.
- Develop expectations for ongoing safety training and safety meeting attendance.
- Develop a training matrix to track progress on individuals and groups within the organization.
- Adjust job notices associated with general staff categories to ensure that new personnel understand the safety related competencies and training needs and the safety related responsibilities of the job.
- Include refresher training in all trainings and apply it to agency personnel and contractors.

### **II. Safety Communication – 673.29(b)**

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



The City's transit service provider reports operations safety related information to the CSO through the service provider's management. In addition, the City's service provider holds regularly scheduled meetings with drivers to ensure that any safety related information is passed along that would affect the execution of the drivers' duties. The City's service provider posts safety related and other pertinent information in a common room for all employees.

The City, in collaboration with our service provider, will begin systematically collecting, cataloging, and, where appropriate, analyzing and reporting safety and performance information to all staff as applicable. To determine what information should be reported, how the information should be reported and to whom, the City's transit provider, in consultation with the CSO will answer the following questions:

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

In addition, the City will direct the service provider to review our current communications strategies and determine whether others are needed. As part of this effort, the City of San Marcos, in collaboration with our service provider, plans to conduct a future Safety Culture Survey to understand how safety is perceived in the workplace and what areas the San Marcos urbanized area should be addressing to fully implement a safety culture.

### III. Infectious Disease Exposure

The City of San Marcos will strive to mitigate infectious disease exposure to the greatest extent possible. The City of San Marcos has created a standard operating procedure as a guideline to help mitigate the exposure. The standard operating procedure can be found in appendix C.



## 5. APPENDIX A

TABLE 8: PTASP SUPPORTING DOCUMENTS

File Name	Revision Date	Document Name	Document Owner
Employee Handbook.pdf	N/A	CARTS Employee Handbook	CARTS
Training Requirements.pdf	N/A	CARTS Training Requirements	CARTS
New Employee Training.pdf	N/A	New Employee Training	CARTS
CARTS Continuing Educational Trainings.pdf	N/A	CARTS Continuing Educational Trainings	CARTS
Drug & Alcohol Policy Final 9/29/2022.pdf	9/29/2022	CARTS Drug & Alcohol Policy	CARTS
DrugFreeWorkplace Policy.pdf	N/A	Drug-Free Workplace Act Requirements	CARTS
CARTSFacilityMaint.pdf	N/A	CARTS Facility Maintenance	CARTS
CARTS Procurement Policy Adopted March 27 2014-amended December 17 2015.pdf	12/17/2015	CARTS Procurement Policy	CARTS
CARTS D&A 2018.pdf	12/10/2015	CARTS Drug & Alcohol Policy for Personnel in Safety-Sensitive Positions	CARTS
Triennial2018Final.pdf	9/18/2018	FY 2018 Triennial Review	CARTS
CARTS Maintenance Plan 7.30.2020.pdf	3/30/2020	CARTS Vehicle Maintenance Plan	CARTS
Organizational chart	2023	City of San Marcos Org chart	CoSM
THE CARTS DISTRICT.docx	N/A	The CARTS District	CARTS
CARTS Service Area_ Maps & Schedules _ Capital Area Rural Transportation System.html	N/A	N/A	CARTS

### A. Glossary of Terms

**Accident:** means an event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of transit vehicles; an evacuation for life safety reasons; at any location, at any time, whatever the cause.

**Accountable Executive (typically the highest executive in the agency):** means a single, identifiable person who has ultimate responsibility for carrying out the SMS of a public transportation agency, and





control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan in accordance with 49 U.S.C. 5326.

**Agency Leadership and Executive Management:** means those members of agency leadership or executive management (other than an Accountable Executive, CSO, or SMS Executive) who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.

**Chief Safety Officer (CSO):** means 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 CSO may not serve in other operational or maintenance capacity, unless the CSO is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

**Corrective Maintenance:** means specific, unscheduled maintenance typically performed to identify, isolate, and rectify a condition or fault so that the failed asset or asset component can be restored to a safe operational condition within the tolerances or limits established for in-service operations.

**Equivalent Authority:** means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's PTASP.

**Event:** means an accident, incident, or occurrence.

**Federal Transit Administration (FTA):** means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

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

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

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

**Key staff:** means a group of staff or committees to support the Accountable Executive, CSO, or SMS Executive in developing, implementing, and operating the agency's SMS.

**Major Mechanical Failures:** means failures caused by vehicle malfunctions or subpar vehicle condition which requires that the vehicle be pulled from service.



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

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

**Operator of a Public Transportation System:** means a provider of public transportation as defined under 49 U.S.C. 5302(14).

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

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

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

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

**Public Transportation Agency Safety Plan (PTASP):** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

**Risk:** means the composite of predicted severity and likelihood of the potential effect of a hazard.

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

**Road Calls:** means specific, unscheduled maintenance requiring either the emergency repair or service of a piece of equipment in the field or the towing of the unit to the garage or shop.

**Safety Assurance (SA):** means the process within a transit agency's SMS that functions to ensure the implementation and effectiveness of safety risk mitigation and ensures that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

**Safety Management Policy (SMP):** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of the agency's employees regarding safety.



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

**Safety Management System (SMS) Executive:** means a CSO or an equivalent.

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

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

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

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

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

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

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

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

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

**Safety Risk Management (SRM):** means a process within a transit agency's Safety Plan for identifying hazards, assessing the hazards, and mitigating safety risk.

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

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

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



**Serious Injury:** means any injury which:

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

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

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

**State of Good Repair:** means the condition in which a capital asset is able to operate at a full level of performance.

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

**Transit Agency:** means an operator of a public transportation system.

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

**Vehicle Revenue Miles (VRM):** means the miles that vehicles are scheduled to or actually travel while in revenue service. Vehicle revenue miles include layover/recovery time and exclude deadhead; operator training; vehicle maintenance testing; and school bus and charter services.

## **B. Additional Acronyms Used**

**ASP:** Agency Safety Plan

**CARTS:** Capital Area Rural Transportation System

**EMP:** Emergency Medical Personnel

**ESRP:** Employee Safety Reporting Program



**FAST Act:** Fixing America's Surface Transportation Act

**MAP-21:** Moving Ahead for Progress in the 21<sup>st</sup> Century Act

**MOU:** Memorandum of Understanding

**MPO:** Metropolitan Planning Organization

**NTD:** National Transit Database

**PM:** Preventative Maintenance

**SM UZA:** San Marcos urbanized area

**SOP:** Standard Operating Procedure

**TxDOT:** Texas Department of Transportation



## **6. APPENDIX B**

### ***A. City Council Minutes or Resolution***



## 7. APPENDIX C

### A. PURPOSE

- 1.1. To provide guidelines for disease control measures including communication to City of San Marcos (City) personnel and the public as well as cleaning and sanitation for transit vehicles and facilities. These activities occur in accordance with the requirements of the City Agency Safety Plan (ASP), as well as any public health advisory orders or directives which apply to City, issued by the Center for Disease Control (CDC), in conjunction with US Department of Homeland Security (DHS), US Department of Transportation (DOT), Federal Transit Administration (FTA), or the appropriate health authority within the State of Texas (State of TX).

### B. INTRODUCTION

- 1.2. As posted by the FTA, the Bipartisan Infrastructure Law requires that Agency Safety Plans (ASP) include strategies to minimize exposure to infectious diseases, consistent with the Centers for Disease Control and Prevention (CDC) guidelines or a state health authority.
- 1.3. This SOP incorporates strategies that “minimize exposure to infectious diseases, consistent with the CDC and prevention guidelines or a state health authority.” Although this procedure will use the term “infectious disease” for most activities and procedures described herein, this term applies to events or activities which rise to the occasion of issuance of a public health advisory. This definition does not supersede nor supplant the definition of any health emergencies as defined by the CDC, State of TX, or others.
- 1.4. The City of San Marcos (City), acting through the Director of Public Works and with assistance from the Transit Manager, has the ultimate responsibility for ensuring compliance of all City employees and contractors/subcontractors with this SOP. (See Appendix E for the City’s Organizational Chart)The City will communicate this SOP to any contractors/subcontractors with agreements for service. The City and contractor/subcontractor will be responsible for documenting changes in the SOP created as a result of guidance issued at the time of the declared emergency, or as updated following suspension of the emergency declaration.

### C. REQUIREMENTS

- 1.5. Practices for reducing the spread of infection will be those recommended by the authority issuing the public health advisory. Updates to procedures may occur as part of the ongoing monitoring of guidance from local, state, and federal health officials.
- 1.6. All employees must document the completion of their responsibilities to enact the provisions which follow under this policy and procedure. Documentation will include existing checklists for the cleaning and/or inspection of vehicles and facilities as part of designated preparation and inspection activities. Such fields will only be activated because of a public health advisory as declared by the CDC in conjunction with DHS, DOT, FTA, State of TX, or other appropriate local



authority. Documentation completed will be retained in keeping with the City's documentation retention policy, as well as made available to City management as necessary to help in their documentation of the measures taken for the duration of any defined public health advisory.

- 1.7. All employees must also comply with all requirements of this procedure, and promptly report any observed deviations from this policy to the appropriate supervisory personnel.
- 1.8. All personal protective equipment (PPE), general cleaning and disinfecting equipment and materials required to address the implementation of this SOP with its vehicles and facilities will be identified, procured, and maintained by the City. These items will follow the guidelines of the CDC, USDOT, FTA, and State of TX.

## D. PROCESS AND PROCEDURES

### I. Key Personnel

- 1.8.1. The following City employees involved in the implementation of this SOP are trained on its contents:
  - Director of Public Works
  - Assistant Director of Public Works
  - Transit Manager
  - Other technical staff deemed necessary by the City
- 1.8.2. The City, acting through the Director of Public Works, with assistance from the Transit Manager, in consultation with others listed above, will participate in development of communication documents related to this SOP, as well as any sharing of data and process for addressing measures employed under this SOP because of a declared public health advisory.
- 1.8.3. Members of this group will participate in the communication response plan for this SOP, which includes a combination of public and agency-wide procedures to achieve the following general measures created by any declared public health advisory: maintain confidence in the process of cleaning and disinfection by addressing the enhanced cleanliness needs required; direct public, City personnel to any changes in services, facility access and hours of operation; direct public, City to distribution of any PPE required for access to City facilities and vehicles (as required); report potential compromise to facilities and vehicles requiring immediate action; coordinating activities with contractors/subcontractors to complete the same.





## II. Program Schedule

- 1.8.4. Development and release of documents to communicate responsibilities and procedures to City personnel, clients, and the public will follow for the duration of the defined public health advisory.
- 1.8.5. The CDC has developed procedures for cleaning and disinfecting facilities and vehicles, which includes recommendations on minimum requirements for scheduling of certain activities. This recommendation has been incorporated as Appendix A. It should be noted that local governments, health departments, and product manufacturers may have other requirements or recommendations that should be considered as part of the City's purchasing and procurement evaluation process.
- 1.8.6. Equipment and materials have the potential to cause damage to agency property if not used properly. Therefore, it is recommended that the City utilize available information supplied by the manufacturer or other credible industry sources to assess the materials and equipment discussed herein for short- and long-term effects of these materials and equipment on the agency's facilities and vehicles.
- 1.8.7. It is likely that during pandemics, materials and equipment could be in limited supply. Should these materials and equipment not be available, there may be suitable alternatives, but each product identified should have been thoroughly evaluated by a recognized third party (such as FTA, industry association, etc.) to determine its effectiveness in protecting against the spread of the virus.

## III. Documentation

- 1.8.8. Development and release of documents to communicate responsibilities and procedures to City personnel, contractors (including subcontractors) engaged by the City in the delivery or support of transit services, clients, and the public will be developed and approved by the City, with input from the Director of Public Works and with assistance from the Transit Manager (or their designee) prior to release.
- 1.8.9. Copies of documents developed to communicate responsibilities and procedures to City personnel, contractors (including subcontractors) engaged by the City in the delivery or support of transit services clients and the public shall be maintained and archived in keeping with City documentation management practices.
- 1.8.10. Checklists to document cleaning and disinfecting procedures employed for vehicles and facilities shall be maintained and archived in keeping with City documentation management practices.



## **E. SPECIFIC EMPLOYEE PROCEDURES/RESPONSIBILITIES**

### **I. Definition of Essential Services**

The City provides essential public transportation services. Therefore, all are considered essential workers performing necessary work and will be directed to report onsite. For such workers, the City including any contractors (including subcontractors) engaged by the City in the delivery or support of transit services will abide by the requirements of public health authorities (CDC, State of TX, etc.) as to any measures required to address specifics of the relevant advisory when being in public spaces and places.

### **II. Posting of Directives**

The City will provide updated policies and procedures for access to facilities, vehicles, and services in compliance with the requirements of public health authorities. The City will communicate these to any contractors/subcontractors in keeping with any agreements for service in place at the time of the declared emergency, by provision of this SOP. A procedure spelling out actions to take during a declared public health advisory is provided in Appendix B.

### **III. Personal Protective Equipment (PPE)**

The City's personal protective equipment (PPE) programs should comply with OSHA guidance 3990 and 29 CFR 1910.132, as well as with internal agency policy and manufacturers' recommendations. This will include PPE for personnel in operations of facilities and vehicles as well as those assigned to clean and disinfect vehicles and facilities as part of this SOP's implementation. Additional PPE measures for those in the cleaning and disinfection process will be required and should follow up-to-date CDC guidelines.

### **IV. Vehicle and Facility Cleaning**

Cleaning of transit vehicles and facilities should always be completed prior to disinfection. Cleaning procedures should be designed to remove all dirt, grime, and debris from surfaces so they can be disinfected during a subsequent process. Recommendations include cleaning transit facilities and vehicles daily.

The entirety of the vehicle or facility area should be cleaned, but efforts should be focused on high-touch surfaces such as workstations, operator controls, seats, kiosks, ticket machines, turnstiles, benches, handrails, garbage cans, door handles, pay phones, restroom surfaces (e.g., faucets, toilets, counters), elevator buttons and system maps. For soft or porous surfaces, remove any visible contamination, if present, and clean with appropriate cleansers indicated for use on these surfaces. Special care should be taken when cleaning electronics to not damage them.



## V. Vehicle and Facility Disinfecting

Vehicle and facility cleaning and disinfecting are two different procedures that should be used together to remove and kill germs, bacteria, and contagious viruses. Once the cleaning process described above is completed, the disinfecting process can begin. Disinfecting should be conducted as thoroughly as possible and can be accomplished by using disinfecting pesticides.

- 1.8.11. As per CDC recommendations, all transit vehicles and facilities should be disinfected with approved pesticides from the Environmental Protection Agency (EPA)'s List N, incorporated as Appendix C. Directions for application may include wiping, spray or fogging applications with the pesticide allowed to sit on the surface for the directed wet contact kill time and then be allowed to air dry.
- 1.8.12. Application of disinfecting pesticides should occur on all high-touch surfaces. Special care should be given to not oversaturate electronics and porous surfaces, as this could cause damage.
- 1.8.13. The City will incorporate changes in disinfection technologies and methods only when certified by the appropriate authority (CDC or EPA) for addressing the specific agent which is the subject of the identified public health advisory.
- 1.8.14. All pesticides and equipment dedicated to their application across City facilities and vehicles will be stored, tested and maintained in keeping with manufacturer directions. Training on the application and use of said items will be maintained by the City for key personnel.
- 1.8.15. The City will maintain a data management and quality assurance plan as part of its program. The data management system should be designed to assist the agency in scheduling and tracking the status of cleaning and disinfecting efforts.

### 1.9. Areas of Known Exposure

- 1.9.1. When the City identifies areas (vehicles and facilities) where people confirmed to be infected have been present, these should be closed to general access as soon as possible. As per the guidelines of the CDC, if possible and feasible, the area should remain inaccessible to staff and passengers for 24 hours, during which time ventilation (i.e., open windows) will be used to circulate air through the location. Following this period, the location will be cleaned and disinfected following the procedures outlined in this SOP.

## F. Other Resources

The City acknowledges the body of research and information on the handling of disease control in their facilities and vehicles continues to evolve based upon research and industry best practices. Appendix D contains the full report *APTA SS-ISS-WP-001-20; Cleaning and Disinfecting Transit Vehicles and Facilities During a Contagious Virus Pandemic. APTA Standards Development Program*, published June 22, 2020, as updated, which served as a basis for this SOP. This document, as well as other



linked references and resources, combined with information from federal, state, and local authorities, will be used as part of the general application of this SOP by the City.



**Appendix A – CDC Program Schedule for Cleaning and Disinfecting Transit Facilities**  
Operated by the City, and Contractors/Subcontractors Operating Services on Behalf of the City

Activity	Frequency
<b>Facility and Vehicle Routine Cleaning</b>	At Least Daily
<b>Full Facility and Vehicle Disinfecting</b>	At Least Daily
<b>Partial Facility and Vehicle Cleaning (High-touch surfaces)</b>	During Shift Changes
<b>Deep Facility and Vehicle Cleaning (All surfaces cleaned)*</b>	At Least Weekly
<b>HVAC Filter Changes*</b>	Per manufacturer’s recommendations, ASHRAE: Consider letting filters load further than usual by reducing the frequency of filter changes. Measure pressure drop to ensure increased loading does not disrupt room pressure differentials. Frequently confirm filters remain snug in their frames.

\*- No recommendations from the CDC

Source: *APTA SS-ISS-WP-001-20; Cleaning and Disinfecting Transit Vehicles and Facilities During a Contagious Virus Pandemic. APTA Standards Development Program*, published June 22, 2020, first revision, October 18, 2021.



**Appendix B – Infectious Disease Procedures**

**PREPARED BY:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**REVIEWED BY:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**APPROVED BY:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Issue Date:** \_\_\_\_\_

**Purpose:** The City of San Marcos (City) aims to protect its workforce and passengers by enacting all prevention efforts when and are where appropriate.

**Requirements:** The Director of Public Works, with assistance from the Transit Manager and City Civil Service, continually monitors guidance from local, state, and federal health officials and implementing workplace modifications where and when appropriate.



**Procedures:** Control and Prevention – The City, through agreement with a contractor/subcontractor, provides essential public transportation services and as such all employees are considered essential workers performing necessary work and are directed to report onsite. For such workers, the City abides by the recommended social distancing and other safety measures and establishes the following:

- Employees should maintain 6 feet of physical distance when reporting to work, clocking in, leaving work, and clocking out;
- Employees' interactions with the public should be modified to allow for additional physical space between parties;
- Employees who can perform their duties remotely are encouraged to work from home with approval from their supervisor; and
- All staff meetings are to be postponed, cancelled, or held remotely unless absolutely necessary.
- The City will provide employees with, at a minimum, non-medical grade face coverings, gloves, and hand sanitizer.
- Face coverings are mandatory for all employees, contractors, and visitors whenever passengers are aboard a bus, van, or other vehicles operated in delivery of transit services on behalf of the residents of the City;
- Passengers are encouraged to wear face coverings while aboard a CARTS vehicle or inside any City facility. Employees will request compliance but may not deny service unless required by federal or state guidelines or city policy;
- Face coverings are mandatory indoors at all City facilities including but not limited to break rooms, meeting rooms, elevators, lobby/reception areas, and hallways; and
- Face coverings are mandatory when physically interacting with the public or other employees if a 6-foot separation cannot be consistently maintained.



**Appendix C – US Environmental Protection Agency, List N Pesticides**

Please find List N at: [List N Advanced Search Page: Disinfectants for Coronavirus \(COVID-19\) | US EPA](#)

Please find more about List N at: [About List N: Disinfectants for Coronavirus \(COVID-19\) | US EPA](#)

**Appendix D –Guides to Bus and Facility Cleaning**

*APTA SS-ISS-WP-001-20; Cleaning and Disinfecting Transit Vehicles and Facilities During a Contagious Virus Pandemic. APTA Standards Development Program, published June 22, 2020, first revision, October 18, 2021. Available through the American Public Transportation Association. [APTA-SS-ISS-WP-001-20\\_R1.pdf](#).*

The COVID-19 Pandemic Public Transportation Responds: Safeguarding Riders and Employees, August 11, 2020, Revision. Available through the American Public Transportation Association. [COVID-19 Transit Guide REVISION-2020\\_08\\_11.pdf \(apta.com\)](#).





Appendix E - City of San Marcos Organizational Chart, Updated August 30, 2023

