INDIANAPOLIS PUBLIC TRANSPORTATION CORPORATION

PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

2026

Indianapolis Publice Transportation Corportion, dba IndyGo

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Plan Development, Approval, and Updates

Indianapolis Public Transportation Corporation, IndyGo, has developed this plan with the goal in mind of providing a safe transportation service to our customers, the citizens of our service area, and the employees of our company. The IndyGo Public Transportation Agency Safety Plan (PTASP) provides a systematic, initiative-taking approach to guide our organization during periods of emergency, whether natural or man-made disasters, as well as when disasters are forecasted or imminent. Our management team will be instrumental to our success by providing direction, communication, and accountability for all emergency response activities. The coordination of emergency response activities will mirror the National Incident Management System (NIMS) to ensure that tasks are organized, communicated, and accomplished with little or no duplication of effort. This plan was designed to guide us in:

- Preparedness
- Providing a superior level of safety in our transit operations.
- Identifying the succession plan and responsibilities for IndyGo.
- Maximizing our resources during an emergency response or crisis.
- Managing continuity of operations during incidents.
- Complying with all agencies at the Federal, State, Tribal, and Local levels to work together to prepare for, prevent, respond to, and recover from emergency incidents.

During emergency incidents, the role of IndyGo is to support the efforts of police, fire, and all other first responders. Transit equipment and personnel may be used for evacuations, shelter, or transport of emergency workers at the scene of an incident. Normal transit services may need to be modified during emergency incidents, but IndyGo remains committed to providing safe, reliable transportation to the public to the greatest extent possible.

The individuals below, and signing this Public Transportation Agency Safety Plan, (PTASP) verify that it was prepared with the *appropriate and applicable* requirements and guidelines set forth by the Federal Transit Administration in 49 CFR Parts 659, 625, 630, 655, 670, 672, 673, 674 and others, and the Metropolitan Planning Organization Program Standard; that they are authorized representatives of the Board of Directors that their signatures attest that all items and conditions contained in this plan are understood, accepted and approved; and that they are committed to implementing the Safety Plan and achieving its safety goals and objectives.

APPROVED BY:

DocuSigned by: Jennifer Pyrz, President and Chief Executive Officer	2/20/2026 Date
DocuSigned by: Greg Hahn Greg Hahn, Board of Directors Chair	2/20/2026 Date

Revisions/Amendments

Revision No.	Revision Date	Revised Sections	Purpose
001	01/01/2023	ALL	Annual review and approval
002	01/01/2024	ALL	Annual review and approval
003	01/01/2025	ALL	Annual review and approval
004	01/01/2026	ALL	Annual review and approval

Change Log

Number	Pages	Change
1	5 & 6	Updated with a chart for the PTASP Annual Review Process
2	6-9	Updated the annual signature approval box and updates/changes to the plan.
3	All	FTA PTASP Technical Assistance Center checklist for updates and changes
4	All	Reviewed updates to SSC members, SOP updates, Training updates, and Risk Reduction Plan updates

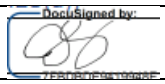
Plan Approval, Certification, and Compliance Record

(49 CFR Part 673 – Public Transportation Agency Safety Plan)

General Information (49 CFR §673.11; §673.13)

Name of Entity That Drafted This Plan	Indianapolis Public Transportation Corporation (IndyGo)

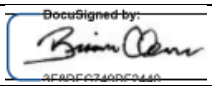
Accountable Executive Approval (49 CFR §673.13(a); §673.23(a))

Signature of Accountable Executive	
Name and Title	Jennifer Pyrz, President and CEO
Date of Signature	2/20/2026

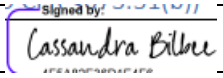
Board of Directors Approval (49 CFR §673.13(b))

Approving Authority	IndyGo Board of Directors
Signature of Approving Authority	
Name of Individual and Title Providing Approval	Greg Hahn, Board of Directors Chair
Date of Approval	2/20/2026
Relevant Documentation (Title and Location)	IndyGo Agency Safety Plan (ASP) – IndyGo SharePoint

Certification of Compliance (49 CFR §673.31(a))

Signature of Individual Certifying Compliance	
Name of Individual and Title Certifying Compliance	Brian Clem, Director of Risk and Safety
Date of Certification	2/20/2026
Relevant Documentation (Title and Location)	IndyGo Agency Safety Plan (ASP) – IndyGo SharePoint

Certification of Compliance with 49 CFR Part 673 – TAMS (49 CFR §673.31(b))

Signature of Individual / Entity Certifying in TAMS	
Name of Individual / Entity Certifying in TAMS	Cassandra Bilbee, Grants Manager
Date of Certification in TAMS	2/24/2026
System Used	Transit Award Management System (TAMS)
Relevant Documentation (Title and Location)	IndyGo Agency Safety Plan (ASP) – IndyGo SharePoint

Safety and Security Committee Approval					
Approval By	**Title of Individual**	**Department of Individual**	**Union Representative**	**Signature**	**Date of Signature**
Brian Clem	Director of Risk and Safety, CSO	Risk and Safety	No	DocuSigned by: 3E8DEC749DF2440...	2/6/2026
Mark Emmons	Assistant Director of Security	Security	No	DocuSigned by: Mark Emmons B90DD612577A4CE...	2/5/2026
Cheryl Purefoy	Deputy Chief of Fleet, Maintenance and Facilities	Transportation	No	DocuSigned by: Cheryl Purefoy D787BBBF5F004CD...	2/10/2026
Timothy Cox	Deputy Chief of Transit Operations	Transportation	No	Signed by: Tim Cox F79B03F58CF3431...	2/6/2026
Devon Smith	Director of Bus Fleet Services	Fleet Services	No	Signed by: Devon Smith 40FD3BC7591B423...	2/9/2026
Joseph Dailey	Mechanic-Defect	Vehicle Maintenance	Yes	Signed by: Joseph Dailey 62EE88AC7F50446...	2/11/2026
William Hazen	Professional Coach Operator	Transportation	Yes	Signed by: 57E3D11BD9D1429...	2/6/2026
Burt Garcia	Lead Instructor	Training	Yes	DocuSigned by: Burt Garcia F847B274B7534CD...	2/6/2026
Keary Bradford	Professional Coach Operator	Transportation	Yes	Signed by: 7CDA38C1A9F84A2...	2/7/2026
Chad Lothridge	Mechanic-Defect	Vehicle Maintenance	Yes	Signed by: Chad Lothridge	2/7/2026

Version Number and Updates *Record the complete history of successive versions of this plan.*			
Version Number	**Section/Pages Affected**	**Reason for Change**	**Date Issued**
001	35	Implementation	07/20/2020
002	ALL	FTA review summary	08/28/2020
003	ALL	FTA 2nd review summary	09/28/2020
004	ALL	Annual Review	12/01/2021
005	ALL	Updates from Bipartisan Infrastructure Law changes to 49 U.S.C § 5329(d)	06/01/2022
006	ALL	Annual Review, update, and approval	03/01/2023
007	ALL	Annual Review, update, and approval	03/01/2024
008	ALL	Annual Review, update, and approval	03/01/2025
009	ALL	Annual Review, update, and approval	03/01/2026

Annual Review and Update of the Public Transportation Agency Safety Plan		
An annual review was conducted by the Risk and Safety Director with the key stakeholders identified in this plan.		
Responsible for Review	**Date PTASP Reviewed By**	**Date Safety Performance Targets Reviewed By**
The Director of Risk and Safety (Assigned Chief Safety Officer) with the Safety and Security Committee (SSC)	March 1st	March 1st
Changes made are reviewed with and approved by the IndyGo CEO (Accountable Executive)	March 1st	March 1st

Date	ASP Development & Review Status	Major Tasks and Activities
August 2020	Complete the initial Draft of ASP	✓ Develop an initial draft ASP, using FTA's template or agency's outline. o Be sure to reference existing and newly developed policies, processes, procedures, or activities, to an appropriate extent. ✓ Reach out to FTA's PTASP TAC to schedule a review of your initial draft ASP or to conduct a technical assistance session. ✓ Schedule a meeting with the Board of Directors to approve the ASP by October 2020 ✓ Brief the Accountable Executive on the progress.
October 2020	Obtain approvals and final required signoffs by Accountable Executive and Board of Directors or equivalent authority	✓ Meet with the Accountable Executive to review. ✓ the final ASP ✓ Obtain the Accountable Executive signature on the ✓ final ASP ✓ Initiate agency-wide communication and rollout ✓ strategy for the ASP ✓ Meet with the Board of Directors for approval of ✓ the final ASP
November 2020	Implement ASP as written	✓ Implement the agency's ASP, including the new Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion elements. ✓ Annually review, update, and approve ASP (to reflect the maturity of the SMS and associated organizational and agency changes) ✓ Annually, certify to FTA.
December 2021	Review ASP	✓ Annual Review process
June 2022	Review ASP and add additional guidelines from FTA	✓ Establish a Safety and Security Committee, convened using an equal number of frontline employees and management representatives. 50% Labor and 50% Management will chair the committee. Duties include responsibility for identifying safety deficiencies, and recommending, and analyzing the effectiveness of

		risk-based mitigations or strategies to reduce consequences identified in the agencies' safety risk assessment. The SSC committee approves the ASP and establishes performance targets for risk reduction before December 31st, 2022. ✓ Develop, and add to their agency safety plan, a risk reduction program for transit operations to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the national transit database. ✓ Require personnel to meet the existing safety training requirements of PTASP and front-line personnel to complete de-escalation training. ✓ Added content to include safety measures for riders and transit workers during public health emergencies. The agency will self-certify; plans are consistent with the Center for Disease Control guidelines to minimize exposure to infectious diseases. ✓ The Agency Safety Plan includes performance targets based on the safety performance measures established in the National Public Transportation Safety Plan.
January 2023	Review and update ASP	✓ Reviewed the PTASP plan and provided updates to the plan. ✓ Co-chairs of the SSC reviewed the plan for approval. ✓ Updated 2023 Safety Targets.
January 2024	Review and update of ASP	✓ Reviewed the PTASP plan and provided updates to the plan. ✓ SSC Charter Members reviewed the plan for approval. ✓ Updated 2024 Safety Targets

January 2025	Review and Update of ASP	✓ Reviewed the PTASP plan and provided updates to the plan. ✓ SSC Charter Members reviewed the plan for approval. ✓ Updated plan from PTASP Technical Assistance Center checklist ✓ Updated 2025 Safety Targets to meet Risk Reduction Plan requirements
January 2026	Review and Update of ASP	✓ Reviewed the PTASP plan and provided updates to the plan. ✓ SSC Charter Members reviewed the plan for approval. ✓ Updated 2026 Safety Targets to meet Risk Reduction Plan requirements.

Review Transmitted to State Authority and Planning Organization	**State Authority and Planning Organization Name**	**Name and Title of Responsible Person**	**Date Review Submitted**
	Indianapolis Metropolitan Planning Organization	Jennifer Higginbotham Jennifer Dunn	March 2026
	Indiana Department of Transportation (INDOT)	Larry Buckel Office of Transit Manager	March 2026

Executive Summary

General

Applicability

Indianapolis Public Transportation Corporation, IndyGo, is committed to comprehensive safety planning. As an operator of a public transportation system that receives Federal financial assistance under Title 49 of the United States Code (USC) Chapter 53, IndyGo is subject to the appropriate and applicable requirements and guidelines set forth by the Federal Transit Administration (FTA), and this Public Transportation Agency Safety Plan is compliant with these requirements as well as with the requirements of the National Public Transportation Safety Plan (NSP).

Policy

IndyGo and the FTA have adopted the principles and methods of System Safety and Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

IndyGo's Public Transportation Agency Safety Plan, hereafter referred to as the "Safety Plan," is an agency-wide safety plan that meets and is responsive to the FTA's Public Transportation Agency Safety Program (PTASP) requirements as set forth by 49 CFR Part 673. The Safety Plan reflects the specific safety objectives, standards, and priorities of IndyGo. IndyGo has incorporated its System Safety compliance into SMS principles and methods tailored to the size, complexity, and scope of its public transportation system and the environment in which it operates.

Transit Agency Information

Transit Agency Name	Indianapolis Public Transportation Corporation, dba IndyGo		
Transit Agency Address	1501 W. Washington Street, Indianapolis, IN. 46222		
Name and Title of the Accountable Executive	Jennifer Pyrz, President, and CEO of IndyGo		
Name of the Assigned Chief Safety Officer	Brian Clem, Director of Risk and Safety		
Mode(s) of Service Covered by this Plan	Fixed Route, Bus Rapid Transit (BRT), Paratransit (contracted)	**All FTA Funding Types (e.g., 5307, 5337, 5339)**	**Fixed Route 5307, 5339, 5337, 5309** **BRT- 5309** **Paratransit- 5310 and 5339**
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route, Bus Rapid Transit (BRT), Paratransit (contracted)		

Definitions

The following definitions used in this document are consistent with 49 CFR Parts 625, 630, 670, 673, and 674. The source of each is noted in brackets, including the "SMS Glossary of Terms: FTA's Guide to Relevant Terms for SMS Development" of September 2016, shown as "[SMS]".

Accident – an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision involving an IndyGo vehicle; a runaway IndyGo vehicle; an evacuation for life safety reasons at any location, at any time, whatever the cause. [SMS]

An *accident* must be reported within the thresholds for notification and reporting outlined in Appendix A to Part 674. [674]

Accountable Executive – a single, identifiable person who has ultimate responsibility and accountability for the implementation and maintenance of the SMS of IndyGo; responsibility for carrying out the Safety Plan and Transit Asset Management Plan (TAMP); and control or direction over the human and capital resources needed to develop and maintain both the Safety Plan with 49 USC 5329 and TAMP.

The Accountable Executive at IndyGo is Jennifer Pyrz (President and CEO of Indianapolis Public Transportation Corporation, IndyGo).

Administrator -- the Federal Transit Administrator or the Administrator's designee. [670, 674]

Advisory -- a notice from FTA to recipients regarding an existing or potential hazard or risk in public Transportation that recommends recipients take a particular action to mitigate the hazard or risk. [670]

Agency Safety Plan (ASP) – a document adopted by a Rail Fixed Guideway System, including IndyGo, detailing its safety policies, objectives, responsibilities, and procedures.

ARB—Accident Review Board

Audit -- examination of records and related materials, including, but not limited to, those related to financial accounts. [670]

BTW -- Behind-The-Wheel is a type of required Operator training.

Capital assets -- a unit of rolling stock, a facility, a unit of equipment, or an element of infrastructure used in public transportation. [625]

CFO -- Chief Financial Officer of IndyGo.

Chief Safety Officer (CSO) – an adequately trained individual who has responsibility for safety and reports directly to IndyGo's Executive Officer, Chief Executive Officer, President, or equivalent officer. The CSO does not serve in other operational or maintenance capacities, unless IndyGo is a small public Transportation provider as defined in Part 673 or a public Transportation provider that does not operate a rail fixed guideway public Transportation system. [673, SMS] The Chief Safety Officer role at IndyGo is fulfilled by the Director of Risk and Safety.

CM -- Construction Manager.

Consequence -- the potential outcome(s) of a hazard. [SMS]

Continuous Improvement -- 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. [SMS]

Contractor -- an entity that performs tasks on behalf of IndyGo FTA, a State Safety Oversight Agency, or other transit agency, through contract or other agreement [674], including tasks required for compliance.

A contractor is a third party hired by the agency to fulfill a compliance need. The l transit agency may not be a contractor for the oversight agency.

COO -- Chief Operations Officer at IndyGo.

Corrective Action Plan -- a plan developed by IndyGo that describes the actions that IndyGo will take to minimize, mitigate, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require IndyGo to develop and carry out a corrective action plan. [670, 674, SMS]

DBE -- Disadvantaged Business Enterprise.

Decision support tool -- a methodology: (1) To help prioritize projects to improve and maintain the state of good repair of capital assets within the public Transportation system based on available condition data and objective criteria; or (2) To assess the financial needs of asset investments over time. [625]

Direct recipient -- an entity that receives funds directly from the Federal Transit Administration. [625]

Directive -- a formal written communication from FTA to one or more recipients that orders a recipient to take specific actions to ensure the safety of a public Transportation system. [670]

EEO -- Equal Employment Opportunity.

Equipment -- an article of nonexpendable, tangible property having a useful life of not less than one year. [625]

Equivalent Authority – The Board of Directors of Indianapolis Public Transportation Corporation, IndyGo, is an entity that carries out duties for a recipient or sub-recipient of FTA funds under 49 U.S.C. Chapter 53, which includes the sufficient authority to review and approve the Safety Plan. [673, SMS]

Event – an Accident, Incident, or Occurrence. [673, 674, SMS]

Examination -- a process for gathering facts or information, or an analysis of facts or information previously collected. [670]

Facility -- a building or structure that is used in the provision of public transportation. [625]

FTA – the Federal Transit Administration.

FMLA -- Family Medical Leave Act.

The full level of performance is the objective standard for determining whether a capital asset is in a state of good repair. [625]

Grade Crossing (as defined in the National Transit Database glossary) is an intersection of roadways, railroad tracks, or dedicated transit rail tracks that run across mixed traffic situations with motor vehicles, streetcar, light rail, commuter rail, heavy rail, or pedestrian traffic, either in mixed traffic or semi-exclusive situations.

Hazard – any real or potential condition that can cause injury, illness, or death; damage to or loss of a facility, equipment, rolling stock, infrastructure, property, system, or IndyGo; or damage to the local environment, or reduction of ability to perform a prescribed function. [673, 674, SMS]

Hazard Analysis -- the formal activities to analyze potential consequences of hazards during operations related to the provision of services. [SMS]

Human Factors -- applied technology comprising principles that apply to equipment design, certification, training, operations, and maintenance, which seek a safe interface between the human and other system components by proper consideration of human performance. [SMS]

Hazard Identification -- formal activities to analyze potential consequences of hazards during operations related to the provision of service. [SMS]

Human Performance -- human capabilities and limitations that have an impact on the effectiveness and efficiency of operations related to the provision of services. [SMS]

Horizon period -- the fixed period within which IndyGo will evaluate the performance of its transit asset management plan. [625]

Implementation strategy -- the approach to carrying out transit asset management practices, including establishing a schedule, accountabilities, tasks, dependencies, roles, and responsibilities. [625]

Incident – an event that involves any of the following: a personal injury that is not serious; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of IndyGo. [673, 674, SMS]

An event must be reported to FTA's National Transit Database by the thresholds for reporting outlined in Appendix A to Part 674. If a transit agency or State Safety Oversight Agency determines that an Incident meets the definition of an *Accident* in this section, that event must be reported to the SSOA by the thresholds for notification and reporting outlined in Appendix A to Part 674. [674]

IndyGo has also defined an Incident as an unexpected event, including security-related events, involving IndyGo passengers or employees that are not related to an accident. Incidents of significant magnitude must be reported to state and/or federal authorities. See Accident Reporting Threshold for a list of reportable events.

Individual -- a passenger, employee, contractor, other IndyGo facility worker, pedestrian, trespasser, or any person on IndyGo property.

Engineering -- permanent installations that interconnect capital assets for use in public transportation. [625]

Inspection -- a process for gathering facts or information, or an analysis of facts or information previously collected. Offer an inspection, and FTA may issue findings and recommendations. [670]

Investigation – the process of determining the causal and contributing factors of an accident, event, or hazard, to prevent recurrence and mitigate risk [673, 674, SMS] or investigation of an event [670].

Lagging Indicators -- provide evidence, through monitoring, that intended safety management outcomes have failed or have not been achieved. [SMS]

Leading Indicators -- provide evidence, through monitoring, that key safety management actions are undertaken as planned. [SMS]

Management of Change -- a process for identifying and assessing changes that may introduce new hazards or impact on the transit agency's safety performance. If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process. [SMS]

MPO – Metropolitan Planning Organization

Near miss -- a safety event where conditions with the potential to generate an accident, event, or occurrence existed, but where an accident, event, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations. [SMS]

Key asset management activities -- a list of the transit asset management activities that are critical to achieving a transit provider’s transit asset management goals for a particular year. [625]

National Public Transportation Safety Plan (NSP) – the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53 [673, 674] or authorized at 49 U.S.C. 5329. [670]

NTSB -- the National Transportation Safety Board, an independent Federal agency. [674]

Occurrence – an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of IndyGo. [673, 674, SMS]

Operational System Description -- 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. [SMS]

Organizational Accident -- an accident that has multiple causes involving many people operating at different levels of the respective agency. [SMS]

Organizational System Description -- a formal description of the structure of a transit agency, including departmental interfaces; functions and responsibilities, directly and indirectly, related to the delivery of transit service; and functions and responsibilities related to the safety management of service delivery. [SMS]

The operator of a Public Transportation system – a provider of public transportation, such as IndyGo, as defined under 49 U.S.C. 5302(14), and which does not provide service that is closed to the public and only available for a particular clientele. [673]

Passenger -- a person who is onboard, boarding, or alighting from an IndyGo-owned/operated transit vehicle for travel.

Pattern or practice -- two or more findings by FTA of a recipient's noncompliance with the requirements of 49 U.S.C. 5329 and the regulations thereunder. [670]

Performance criteria – categories of measures indicating the level of safety performance within IndyGo. [673, SMS]

Performance measure -- a parameter that is used to assess performance outcomes. [625]

Performance target – a specific level of performance for a given performance measure over a specified timeframe. [625, 673]

Person -- a passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a fixed guideway public Transportation system. [674]

PHA -- Preliminary Hazard Analysis.

PIP- Performance Improvement Plan

PPE – Personal Protective Equipment.

Practical Drift – the slow and inconspicuous, yet steady, uncoupling between written procedures and actual practices during the provision of services. [SMS]

Program Standard - is a written document developed and adopted by Regional Agencies that describes the policies, objectives, responsibilities, and procedures used to provide safety and security oversight of transit agencies.

Public Transportation Agency Safety Plan (PTASP) -- the comprehensive agency safety plan for IndyGo that is required by 49 U.S.C. 5329 and Part 673 [673], based on a Safety Management System. Until one year after the effective date of FTA's PTASP final rule, a System Safety Program Plan (SSPP) developed under 49 CFR part 659 may serve as the transit agency's safety plan. [674]

Public Transportation Safety Certification Training Program -- either the certification training program for Federal and State employees, or other designated personnel, who conduct safety audits and examinations of public transportation systems, and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions by 49 U.S.C. 5329(c)(2), or the program authorized by 49 U.S.C. 5329(c)(1). [674]

Public Transportation System -- the entirety of IndyGo's operations, including the services provided through contractors. [625, SMS]

Recipient -- an entity that receives Federal financial assistance under 49 USC Chapter 53 [670] and includes sub-recipients [625].

Record -- any writing, drawing, map, recording, tape, film, photograph, or other documentary material by which information is preserved. The term ‘‘record’’ also includes any such documentary material stored electronically. [670]

RFP – Request for Proposal.

Risk -- the composite of predicted severity and likelihood of the potential effect of a hazard. [674, SMS]

Risk mitigation – a method or method to eliminate or reduce the effects of hazards. [673, 674, SMS]

Rolling stock -- any revenue vehicle used in a public Transportation system. [625]

ROW -- right-of-way

Safety – the state in which the potential of harm to persons or property damage during operations related to the provision of services is reduced to and maintained at an acceptable level through continuous hazard identification and safety risk management activities. [SMS]

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, and construction before the start of passenger operation.

Safety Assurance – processes within IndyGo SMS that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that IndyGo meets or exceeds its safety objectives through the collection, analysis, and assessment of information. [673, SMS]

Safety Deficiency – a condition that is a source of hazards and/or allows the perpetuation of hazards in time. [SMS]

Safety Management Policy – IndyGo’s documented commitment to safety, which defines IndyGo’s safety objectives and the accountabilities and responsibilities of its employees regarding safety. [673, SMS]

Safety Management Policy Statement – a document signed by the Accountable Executive and distributed throughout IndyGo that formalizes executive leadership’s commitments to support SMS with both short-term and long-range initiatives. [SMS]

Safety Management System (SMS) – the formal, top-down, IndyGo-wide approach to managing safety risk and assuring the effectiveness of IndyGo’s safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks, hazards [673], and management of safety risks [625, 670, SMS].

Safety Management System Development Plan – a phased approach for a transit agency to coordinate its manageable, logical, and efficient sequence of steps for implementing SMS activities. The Development Plan also assists in effectively managing the workload associated with implementation activities, including the allocation of resources. [SMS]

Safety Management System Executive -- a Safety Officer or equivalent. [SMS]

Safety Management System Gap Analysis -- identifies and documents the transit agency's existing safety management processes, the organizational structures in place to support them, and the resources already available within the transit agency to deliver its safety management processes. The gap analysis then compares the transit agency's existing safety management processes, the organizational structures in place, and the resources available to the transit agency to those safety management processes, organizational structures, and resources that it would need for the effective and efficient operation of its SMS. In so doing, it identifies "gaps" between what is needed and what is available within the transit agency for SMS implementation. [SMS]

Safety Management System Implementation Team -- an interdisciplinary team consisting of representatives from all operating, maintenance, and safety-related functions who assist the SMS Implementation Lead by providing the necessary technical and subject matter experts to effectively develop needed processes, activities, and tools. [SMS]

Safety Management System Manager -- the individual who runs the day-to-day operations of the transit agency's Safety Management System. This individual may also serve as the SMS Implementation Lead, especially in small or rural transit systems. [SMS]

Safety Objective -- a high-level, global, generic, and non-quantifiable statement regarding conceptual safety achievements to be accomplished by an organization regarding its safety performance. [SMS]

Safety Performance -- an organization's safety effectiveness and efficiency, as defined by safety performance indicators and safety performance targets, measured against the organization's safety objectives. [SMS]

Safety Performance Indicator -- a data-driven, quantifiable parameter used for monitoring and assessing safety performance. [SMS]

Safety Performance Measurement -- the assessment of non-consequential safety-related events and activities that provide ongoing assurance that safety risk mitigations work as intended. [SMS]

Safety Performance Monitoring -- the 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. [SMS]

Safety Performance Monitoring and Measurement -- activities a transit agency must establish to:

- Monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
- Monitor its operations to identify hazards not identified through the Safety Risk Management process;
- Monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- Investigate safety events to identify causal factors; and
- Monitor information reported through any internal safety reporting programs. [SMS]

Safety Performance Target – a specific level of performance for a given performance measure over a specified timeframe related to safety management activities. [SMS]

Safety Promotion – a combination of training and communication of safety information to support SMS as applied to IndyGo's system. [673, SMS]

Safety Reporting Program -- a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action. [SMS]

Safety Review -- a formal, comprehensive, on-site review by the MPO of the transit agency's safety practices to determine whether the agency complies with the policies and procedures required under the Safety Plan.

Safety Risk – the assessed probability and severity of the potential consequence(s) of a hazard, using as a reference the worst foreseeable, but credible, outcome. [673, SMS]

Safety Risk *E*valuation – the formal activity whereby IndyGo determines Safety Risk Management priorities by establishing the significance or value of its safety risks. [673, SMS]

Safety Risk Management (SRM) – a process within IndyGo's SMS/Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risks. [673, 674, SMS]

Safety Risk Mitigation -- the activities whereby a public Transportation agency controls the probability or severity of the potential consequences of hazards. [SMS]

Safety Risk Probability -- the likelihood that the consequence might occur, taking as reference the worst foreseeable – but credible – condition. [SMS]

Safety Risk Severity -- the anticipated effects of a consequence, should it materialize, taking as reference the worst foreseeable – but credible – condition. [SMS]

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

Security is defined as freedom from intentional danger for employees and passengers.

Serious injury – any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or nose); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface. [673, 674]

Small public Transportation provider – a recipient or sub-recipient of Urbanized Area Formula Program funds under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in revenue service and does not operate a rail fixed-guideway public Transportation system. [673]

SMS Executive – a Safety Officer or an equivalent. [673]

SRM – Safety Risk Management (see above).

SSCP -- Safety and Security Certification Plan

SSCRC -- Safety and Security Certification Review Committee.

State – the State of Indiana [673, 674] or a State agency [670].

State of Good Repair (SGR) – the condition in which a capital asset operates at a full level of performance. [625, 673]

State Safety Oversight Agency (SSOA) – 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 outlined in 49 CFR part 674 [670, 673, 674, SMS].

Sub-recipient -- an entity that receives federal transit grant funds indirectly through a State or a Direct Recipient. [625]

System Safety is defined as the discipline that, through the application of system safety management and engineering principles, achieves the optimal degree of safety within the constraints of operational effectiveness and solid financial management.

Testing -- and assessment of equipment, facilities, rolling stock, and operations of a recipient's public Transportation system. [670]

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

Transit agency – an operator of a public Transportation system that receives Federal financial assistance under 49 U.S.C. Chapter 53, including IndyGo. [673, SMS]

Transit asset management (TAM) -- 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 cycle to provide safe, cost-effective, and reliable service. [625]

Transit Asset Management Plan (TAMP) – a plan developed for IndyGo under 49 CFR part 625 that includes, at a minimum, capital asset inventories and condition assessments, decision support tools, and investment prioritization. [625, 673]

Transit asset management policy -- a transit provider's documented commitment to achieving a state of good repair for its capital assets. The transit asset management policy defines the transit provider's transit asset management objectives and defines and assigns roles and responsibilities for meeting those objectives. [625]

Transit asset management strategy -- the approach a transit provider takes to affect its policy, including how it will meet objectives and state-of-good-repair performance targets. [625]

Transit asset management system -- a strategic and systematic process of operating, maintaining, and improving public transportation capital assets effectively, through the life cycles of those assets. [625]

Transit provider -- a recipient or sub-recipient, including IndyGo, who owns, operates, or manages capital assets used in the provision of public transportation. [625]

USDOT – United States Department of Transportation.

Vehicle -- any rolling stock used on a fixed guideway public Transportation system, including but not limited to passenger and maintenance vehicles. [674]

VP – Vice President

VRM – Vehicle Revenue Mile - The miles that vehicles are scheduled to or actually travel while in revenue service. Vehicle revenue miles are calculated per 100,000 miles.

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

Safety Plan

General

IndyGo has established a Safety Plan that meets or exceeds the General Requirements of both requirements and guidelines, including the following required elements:

- ✓ The Safety Plan, and subsequent updates, will be signed by the IndyGo President and CEO, who is the *Accountable Executive*, the Director of Risk and Safety, who is the Chief Safety Officer, and approved by the Indianapolis Public Transportation Corporation Board of Directors.
- ✓ The Safety Plan documents the processes and activities related to SMS implementation.
- ✓ The Safety Plan includes performance targets based on the safety performance criteria established under the National Public Transportation Safety Plan (NSP), and the state of good repair standards established in the regulations that implement the National Transit Asset Management System.
- ✓ IndyGo will establish a process and timeline for conducting an annual review and update of the Safety Plan.
- ✓ The Safety Plan includes reference to an emergency preparedness and response plan and procedures that address the assignment of employee responsibilities during an emergency, and coordination with Federal, State, regional, and local officials with roles and responsibilities for emergency preparedness and response in the IndyGo area.
- ✓ The Safety Plan includes bus and paratransit modes of service.
- ✓ IndyGo will maintain the Safety Plan with the recordkeeping requirements in Subpart D of 49 CFR Part 673.

Certification of Compliance

§ REGULATORY ALIGNMENT (2026 UPDATE)
IndyGo's Agency Safety Plan (ASP) is updated to align with:
Public Transportation Agency Safety Plans (PTASP) Final Rule (49 CFR Part 673; effective May 13, 2024).
National Public Transportation Safety Plan (NSP; April 9, 2024).

This update confirms: (1) documented Safety Committee procedures and AE override written statement workflow; (2) SRRP targets per modal group using NSP measures and the 3-year rolling average of NTD data; (3) de-escalation training embedded in Safety Promotion; (4) infectious disease hazards evaluated and monitored via SMS (SRM and SA).

The State Safety Oversight Agency will review and approve the Safety Plan developed by IndyGo, as authorized in 49 U.S.C. 5329(e), and its implementing regulations at 49 CFR Parts 674 and 673.

On an annual basis, IndyGo will self-certify its compliance with 49 CFR Part 673 and send a copy to the Indiana State Metropolitan Planning Organization (MPO).

Safety Management System

IndyGo herein establishes and implements a Safety Management System (SMS). The IndyGo SMS is appropriately scaled to the size, scope, and complexity of IndyGo, and includes four components:

- Safety Management Policy (Part I)
- Safety Risk Management (Part II)
- Safety Assurance (Part III)
- Safety Promotion (Part IV)

Safety Management Policy

IndyGo has a written statement of safety management policy (Chapter 1) that includes IndyGo's safety objectives and safety performance targets. The IndyGo safety management policy will be communicated throughout the organization.

Responsibilities

As detailed in Chapter 2, IndyGo has also established the necessary authorities, accountabilities, and responsibilities for managing safety amongst the following individuals in IndyGo, as they relate to the development and management of IndyGo's SMS:

(1) *Accountable Executive*: IndyGo has identified the President and CEO as the Accountable Executive. The CEO is accountable for ensuring that IndyGo's SMS is effectively implemented throughout the system and ensuring action is taken, as necessary, to address substandard performance in IndyGo's SMS. The CEO may delegate specific responsibilities, but the ultimate accountability for IndyGo's safety performance cannot be delegated and always rests with the CEO.

(2) *Chief Safety Officer (CSO)* The Accountable Executive has designated a CSO as the key SMS Executive who has authority and responsibility for the day-to-day implementation and operation of IndyGo's SMS. The CSO holds a direct line of reporting to the CEO. The Director of Risk and Safety reports directly to the CEO, or another designee assigned by

the CEO, and will serve as the Executive when the Director of Risk and Safety position is vacant or unavailable.

(3) *IndyGo leadership and executive management*: IndyGo has also identified other members of its leadership and executive management who have authority or responsibility for the day-to-day implementation and operation of an agency's SMS.

(4) *Key staff*: IndyGo has designated key staff, groups, or committees to support the CEO and Director of Risk and Safety in developing, implementing, and operating the agency's SMS.

IndyGo has also established a process that allows employees to report safety conditions to senior management and offers protection for employees who report adverse safety conditions to management.

Safety Risk Management

Safety Risk Management Process

IndyGo has developed and implemented a Safety Risk Management process for all elements of its public transportation system. The Safety Risk Management process is comprised of the following activities:

- Identification of safety hazards;
- analysis of safety hazards;
- safety risk evaluation; and
- safety risk mitigation.

Safety Hazard Identification and Analysis

IndyGo has established a process for hazard identification and analysis (Chapter 5).

Safety Risk Evaluation and Mitigation

IndyGo has established activities to evaluate and prioritize the safety risks associated with the potential consequences of safety hazards (Chapter 6). Safety risks are evaluated in terms of probability and severity, considering mitigations already in place to reduce the probability or severity of the potential consequence(s) analyzed. IndyGo has established criteria for the development of safety risk mitigations that are necessary based on the results of the agency's safety risk evaluation.

Safety Assurance

Safety Performance Monitoring and Measurement

IndyGo has established activities (described in Chapter 7) to:

- Monitor the system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
- Monitor IndyGo operations to identify hazards not identified through the Safety Risk Management process;
- Monitor IndyGo operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- Investigate safety events to identify causal factors; and

- Monitor information reported through any internal safety reporting programs.

Management of Change

IndyGo has established a process for identifying and assessing changes that may introduce new hazards or impact IndyGo's safety performance. If IndyGo determines that a change may impact its safety performance, then IndyGo will evaluate the proposed change through its Safety Risk Management process. (See Chapter 8.)

Continuous Improvement

IndyGo has established a process to assess its safety performance (Chapter 9). If IndyGo identifies any deficiencies as part of its safety performance assessment, then IndyGo will develop and conduct, under the authority of the ED, a plan to address the identified safety deficiencies.

Safety Promotion

IndyGo realizes the importance of ensuring its employees and riders are aware of IndyGo's safety management policies and procedures to effectively manage the system's day-to-day operations. To do this, IndyGo relies on several forms of effective communication.

Employees: IndyGo is constantly evaluating existing policies and procedures to verify their effectiveness. To do this, IndyGo seeks input from all staff, contractors, and customers to determine if the change is necessary based on trends, data analysis, operational changes, or new assets. Several methods are used to communicate policy and/or procedure changes, including:

- Employee memorandum through a paycheck, a daily manifest of work orders, and agency meetings
- Bulletin board notices
- Employee email notification
- Departmental meetings

IndyGo includes a training element for safety management policies impacting safety or service delivery and is conducted before the policy's effective date. New policies and procedures are incorporated into orientation training for new employees as well.

Depending on the importance of the policy or procedure change, an acknowledgment signature is required of each employee to verify their understanding of the change.

Riders: If a rider policy is changed or added, IndyGo notifies riders through the following methods:

- Notice posted on vehicles and facilities, including effective date and who to contact for more information.
- Changes to digital rider guidance, including schedules and ride guides as appropriate.
- Public Meetings
- Social Media

- Any services impacted by policy changes will include outreach as required by Federal Guidance.

Safety Plan Documentation and Recordkeeping

Safety Plan documentation and recordkeeping are described in Chapter 4.

Safety Plan Documentation

At all times, IndyGo maintains documents that set forth and support its Safety Plan, including those related to the implementation of IndyGo's SMS, and results from SMS processes and activities. IndyGo maintains documents that are included as a whole or by reference, describe the programs, policies, and procedures that IndyGo uses to conduct the Safety Plan.

Safety Plan Records

In addition to any documents or records required elsewhere by 49 CFR Part 673, IndyGo maintains records of:

- Safety risk mitigations developed with 49 CFR Part 673.25;
- Results from IndyGo performance assessments as required under 49 CFR Part 673.27; and
- Employee safety training is taken for compliance with this part and the Public Transportation Agency Safety Training Certification Program.

All safety plans are maintained for 3 years while being reviewed and updated annually.

Part 1 Safety Management Policy

Chapter 1- Safety Policy Statement

1.0 General Safety Policy

It is the policy of IndyGo to provide a safe and reliable transportation service for the public, to provide safe and healthy working conditions for IndyGo employees, and to comply with applicable occupational and environmental laws and regulations.

Operational and safety training, accident investigation, Standard Operating Procedures, and audit/inspection programs are documented and referenced in IndyGo's Safety Plan. The purpose of this plan, among others, is to recognize and correct unsafe acts and conditions, promote safety awareness, and assist in the prevention of injuries and illness, as well as events that are harmful to the environment.

Every IndyGo employee and any outside contractor who serves IndyGo must adhere to the Safety Plan; to recognize, report, and correct hazards; work to promote safety awareness and actively assist in accident prevention.

The President and CEO of IndyGo accepts the overall responsibility for safety at IndyGo.

All IndyGo employees must perform their assigned duties safely and efficiently. The Chief Operating Officer/Vice President of Operations, Chief Public Affairs Officer, Chief Legal Officer, Chief People Officer (HR), Director of Risk & Safety, Director of Security and Life Safety, Director of Training, Deputy COO, Deputy Chief Transportation Officer, Director of Mobility Solutions, Chief Financial Officer, Chief Information Officer, Chief Development Officer, Director of Facilities, Director of Vehicle Maintenance, Director of Procurement, and the Director of Service Planning has the primary responsibility for coordinating the implementation of the Safety Plan and monitoring compliance.

The signatures of the IndyGo President and CEO, and the Director of Risk and Safety, included in the Approvals section of this plan attest to the fact that this plan is understood, accepted, and approved; and that management is committed to implementing SMS through the Safety Plan and achieving its safety goals and objectives.

1.1 Safety Management Policy

IndyGo is furthermore committed to comprehensive safety planning, and as an operator of a public Transportation system that receives Federal financial assistance under Title 49 USC Chapter 53, also complies with 49 CFR Part 673.

IndyGo has adopted the principles and methods of Safety Management Systems (SMS) as the basis for enhancing its safety program. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

IndyGo has a written statement of safety management policy that includes IndyGo's safety objectives and safety performance targets.

IndyGo will maintain an active Safety Management System (SMS) that encourages the open sharing of information on all safety issues. We expect our employees to report their safety concerns to agency management. No employee will be asked to compromise safety to "get the job done."

Our overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent of eliminating unacceptable safety risks in our transit operations.

To that end, we will continuously examine our operations for hazards. We will establish a non-punitive employee safety reporting program, train staff on safety management, document our findings and safety risk mitigations, and strive for continuous improvement of our safety performance.

As required by the Federal Transit Administration, we have established annual safety performance targets to help us measure the safety of our transit service. In addition, to address our overall safety objective, we will conduct hazard identification workshops with all frontline, supervisory, and management personnel during this calendar year. We will work to increase the annual number of voluntary reports received from employees by 20 percent and actively track our safety risk mitigations. To ensure we meet this objective, our safety department will report each quarter to our entire agency on the number of:

- Hazard identification workshops were carried out in the quarter.
- Number and type of hazard reports received per employee in the quarter, versus the same quarter last year; and
- Number and type of safety risk mitigations implemented in the quarter.

Ultimate responsibility for safety at IndyGo rests with the Accountable Executive.

When the Safety Committee recommends a safety risk mitigation unrelated to the safety risk reduction program and the Accountable Executive decides not to implement the safety risk mitigation, the Accountable Executive prepares a written statement explaining their decision and submits and presents it to the transit agency's Safety Committee and Board of Directors or equivalent entity. (§ 673.25(d)(6))

Responsibility for making our operations safer for everyone lies with each one of us— from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established as part of the SMS.

1.1.1 Safety Management Policy Statement

Table A: Safety Management Policy Statement

Safety is a core objective of Indianapolis Public Transportation Corporation (IPTC), DBA IndyGo. IndyGo is committed to developing, implementing, maintaining, and continuously improving processes to ensure the safety of its customers, employees, and the public. IndyGo will use safety management processes and hazard analysis to prioritize organizational resources, processes, people, and technology to foster a safety culture. SMS is a formal, top-down, data-driven, organization-wide approach to managing safety risks and assuring the effectiveness of safety risk mitigations. It is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry's existing safety foundation to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully. SMS is about applying resources to risk and is based on ensuring that a transit agency has the organizational infrastructure to support decision-making at all levels regarding the assignment of resources.

IPTC is committed to:

Executive Commitment: Management will lead the development of an organizational culture that promotes safe operations while ensuring safe practices, improving safety when needed, and encouraging safety reporting and communication. IndyGo will hold executives, directors, managers, and employees accountable for safety performance.

Communication & Training: Employee engagement is crucial in an effective safety management program. Communication from various methods, including e-mails, memos, bulletin boards, pigeonholes, mailboxes, web websites, can messages via bus radio, and big screen TVs ECT will be used for greater awareness of safety objectives, performance targets, and safety communication. All levels of management must proactively engage employees to identify hazards and to be open, honest, and transparent with safety concerns. All employees will be communicated to and trained in the importance of our safety management system and identifying hazards to mitigate risk.

Responsibility & Accountability: All levels of management from a top-down approach will be responsible for delivering a safe and quality public transportation service. Management will take an active role in the safety risk management process to ensure that safety assurance is supported. Management is responsible for ensuring that safety risk management is being performed in their operational areas. Risks identified with safety concerns will be assessed and mitigated in the department that they reside in. Identified hazards and the corrective actions will be documented by that department and then reassessed for validation.

Responsibility of Employees & Contractors: All employees and contractors will support IPTC's safety management by ensuring that safety concerns and hazards are identified and communicated.

Employee Reporting: Executive management will establish a safety-reporting program as a way for employees to voice their safety concerns. Employees can report anomalously as their option. All employees will be responsible for utilizing this program as part of our safety management plan. No punitive action will be taken against an employee who communicates a safety concern through the safety-reporting program unless such disclosure indicates the following: An illegal act, gross negligence, or misconduct, or a deliberate or willful disregard of IndyGo rules, policies, or contract.

Performance Monitoring & Measuring: IPTC will establish meaningful metrics for safety performance targets to ensure continual safety improvements. Management will verify that safety mitigations put in place are reasonable and effective.

Review and Evaluation: IPTC will measure the agency's safety plan performance by analyzing key performance indicators, reviewing inspections, investigations, and corrective action reports, and auditing the processes that support safety. The Safety and Security Committee will be a critical component in the validation and review of corrective actions. All these activities will become the basis for revising or developing safety objectives, and safety performance plans with the goal of continuous safety improvement.

The agency's Accountable Executive is ultimately responsible for the safety management plan.

1.1.2 Communication

The IndyGo safety management policy will be communicated throughout the organization through:

- SMS Training for all employees and contractors;

- Communications with all IndyGo personnel from the CEO and Director of Risk and Safety;
- New hire training for employees and contractors that results in a signed receipt.
- Safety Briefings; and
- General bulletin board postings.

The Safety Plan will always be available to all employees. It will be maintained in an accessible electronic file and hard copy(s) by all key SMS personnel in locations accessible to employees under their supervision and management.

1.2 Authority

1.2.1 Federal

Statutory mandates in the Moving Ahead for Progress in the 21st Century Act (Pub. L. 112–141; July 6, 2012) (MAP–21), reauthorized by the Fixing America's Surface Transportation Act (Pub. L. 114–94; December 4, 2015) and codified at 49 U.S.C. 5329(d), are in place to strengthen the safety of public transportation systems that receive Federal financial assistance under Chapter 53. This legislation defines requirements for the adoption of Safety Management Systems (SMS) principles and methods; the development, certification, and update of Public Transportation Agency Safety Plans; and the coordination of Public Transportation Agency Safety Plan elements with other FTA programs and proposed rules, as specified in 49 U.S.C. 5329.

In Section 20021 of MAP–21, Congress directed the FTA to establish a comprehensive Public Transportation Safety Program, one element of which is the requirement for Public Transportation Agency Safety Plans. Under 49 U.S.C. 5329(d), the FTA must issue a final rule requiring operators of public transportation systems that receive financial assistance under Chapter 53 to develop and certify Public Transportation Agency Safety Plans.

1.4 Objectives and Performance Targets

IndyGo has established Safety Objectives, performance targets, and performance measures in coordination with its State Safety Oversight Agency, if applicable, and compliance with the National Public Transportation Safety Plan. These are delineated in Part III: Safety Assurance.

1.5 Scope

It is the mission of IndyGo to connect our community to economic and cultural opportunities through safe, reliable, and accessible mobility experiences.

Addresses all IndyGo departments and contractors;

Applies to all activities that involve planning, design, construction, procurement, installation, and testing of equipment or facilities, operations, maintenance, support activities, and the environment in which the transit system operates, including areas of public access and adjacent property;

Charges each officer, director, manager, supervisor, and employee with the responsibility for Safety Plan implementation and success;

Requires coordination, integration, communication, and cooperation among all officers, directors, managers, supervisors, departments, and employees:

Encompasses all paratransit and bus facilities, equipment, vehicles, and employee activities and applies to all who encounter the bus systems;

Establish appropriate safety performance measures to ensure continuous safety improvement.

Accommodates federal and state safety assessments, inspections, investigations, audits, examinations, and testing; and

Fosters a positive safety culture at IndyGo.

1.6 Purpose

IndyGo has adopted the practices and methods of SMS as described in the National Transportation Safety Plan (NSP). The purpose of this Safety Plan is to systematically implement IndyGo's SMS program and introduce safety processes where they are necessary to achieve assurance. The Safety Plan is reviewed annually to ensure all systems, equipment, facilities, plans, procedures, manuals, and training programs follow established safety requirements; and that the Safety Plan reflects the current SMS configuration at IndyGo. Specifically, the Safety Plan:

- Establishes the safety program on a company-wide basis;
- Provides a framework for implementing IndyGo's safety management system, policy, goals, and objectives;
- Identifies the relationships and responsibilities of each IndyGo department relative to achieving safety goals and objectives;
- Identifies the relationships and responsibilities of IndyGo with municipal and state governing bodies and other organizations and agencies that impact transit system safety;
- Provides a mechanism whereby IndyGo can demonstrate its commitment to safety, foster a positive safety culture, and meet safety performance goals.
- Provides requirements that, as appropriate, contractors and suppliers meet IndyGo's safety requirements before commencing work and/or while on the premises;
- Satisfies federal, state, and local requirements;
- Ensures that the system meets or exceeds accepted industry safety standards;
- Facilitates FTA and SSOA safety inspections, reporting, corrective actions, and general and special directives and requirements; and
- Implement NSP performance criteria, state of good repair, vehicle safety standards, meeting training criteria, and all other safety management requirements and goals.

Chapter 2- Safety Accountability and Responsibility

2.0 Management Structure

IndyGo has established the necessary authorities, accountabilities, and responsibilities for the management of safety amongst the following individuals in IndyGo, as they relate to the development and management of IndyGo SMS:

Accountable Executive: IndyGo has identified the President and CEO of IndyGo as the Accountable Executive. The CEO is accountable for ensuring that the agency's SMS is effectively implemented throughout IndyGo's system and ensuring action is taken, as necessary, to address substandard performance in IndyGo's SMS. The CEO may delegate specific responsibilities, but the ultimate accountability for IndyGo's safety performance cannot be delegated and always rests with the CEO.

Chief Safety Officer (CSO): The Accountable Executive has designated the Chief Safety Officer (CSO) as the SMS Executive with authority and responsibility for the day-to-day implementation and operation of IndyGo's SMS. The CSO holds a direct line of reporting to the CEO. The CEO or other designee assigned by the CEO will serve as the CSO when the position is vacant or unavailable.

IndyGo leadership and executive management: IndyGo has also identified other members of its leadership and executive management who have authority or responsibilities for the day-to-day implementation and operation of IndyGo's SMS.

Key staff. IndyGo has designated key staff, groups, or committees to support the CEO and CSO in developing, implementing, and operating the agency's SMS.

2.1 System Overview and History

From 1864 to 1953, Indianapolis was home to a number of streetcar routes. The first bus routes were established in 1923, and trolley buses operated between 1932 and 1957. Indianapolis then transitioned to an all-bus transit system, and the Indianapolis Public Transportation Corporation (IPTC) was established by the City of Indianapolis in 1973. On January 7, 1975, Metro assumed operations of the Indianapolis Transit System. In 1996, Metro became known as IndyGo.

During the 1990s until the early 2000s, IndyGo faced significant service cuts. In 2009, the Indy Connect initiative was launched, and a long-term transportation plan for Indianapolis was developed.

The Marion County Transit Plan (MCTP) was developed in 2014, which paved the way for the proposed grid network, longer service hours, and the addition of three bus rapid transit lines. In 2016, Marion County voters approved the 0.25% income tax needed to implement the MCTP. The first local route improvements and construction of the Red Line, the first bus rapid transit line, began in 2018, and the Red Line opened for service in 2019. The Purple Line launched in 2024. Local route improvements continued, including all of IndyGo's routes beginning to operate every day of the week.

Looking ahead, IndyGo has plans to construct one more bus rapid transit line, the Blue Line, as well as implement a new bus network.

2.2 IndyGo Operations

2.3 Administration

It is the responsibility of IndyGo's Senior Staff, Directors, Managers, and Supervisors to ensure safety throughout the system. Safety responsibilities and tasks are described throughout this section.

2.3.1 Board of Directors

A seven-member Board of Directors approves IndyGo policies relating to operations, contracted services, safety, finance, and overall corporate structure. The Mayor of Indianapolis and the City-County Council of Indianapolis and Marion County appointed the bipartisan group. The mayor selects three members, and the Council selects four.

2.3.2 President and CEO of IndyGo

The President and CEO of IndyGo has the ultimate responsibility of carrying out the PTASP and directing the allocation of available resources as necessary to meet system safety goals and objectives, monitoring and evaluating safety programs. This position is responsible for carrying out the Transit Asset Management Plan (TAM) and has control/direction over the human and capital resources needed to develop and maintain both the PTASP[1] and the TAM[2]. In addition, the CEO implements IndyGo's safety policy and provides policy direction to departments while advising in the development of strategies for the resolution of major problems. Implements safety risk mitigations for the safety risk reduction program that are included in the ASP under § 673.11(a)(7)(iv). (§ 673.23(d)(1)(i)), Receives and considers all other safety risk mitigations recommended by the Safety Committee. The CEO is responsible for the following functions: safety and security in operations; operations training; transit information; ADA compliance; bus and paratransit operations; maintenance operations; scheduling; and service planning. In addition, this position oversees the grievance procedure and arbitrations and manages all committee activities between labor and management.

IndyGo Executives reporting directly to the CEO include:

Chief Operations Officer/Vice President of Operations-COO

Chief Public Affairs Officer

Chief People Officer (Human Resources)

Chief Legal Officer

Chief Development Officer

Chief Information Officer

Chief Government Affairs Officer

Chief Financial Officer- CFO

Executive Director of the IndyGo Foundation

[1] In accordance with 49 U.S.C. 5239(d)
[2] In accordance with 49 U.S.C. 5326

Executives and their supporting staff are described below.

2.3.3 Chief Operations Officer-COO

The Chief Operations Officer-COO supports the Safety Management System of the organization and promotes a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The COO is required to play an active role in the safety risk management process to ensure that safety assurance communication is supported and will be responsible for the identification of hazards and any corrective actions as deemed appropriate. The COO will document and address any related concerns in the Operations Department. This position will serve as an active member of the Emergency Response Team (ERT) and will be the staff advisor for their department. The COO will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.3.4 Director of Risk and Safety

The CEO of IndyGo has designated the Director of Risk Safety to function as the Chief Safety Officer[3] (CSO) of IndyGo. The Director of Risk and Safety have the authority and responsibility for the day-to-day implementation and operation of IndyGo's Safety Management System (SMS). This position holds a direct line of reporting to the CEO of IndyGo.

The Safety Department is further staffed by Risk and Safety Specialists who conduct safety activities and report to the Director of Risk and Safety. The Manager of Risk and Safety reports to the Director of Risk and Safety. The Director of Risk and Safety ensure all emergency management responsibilities are met.

2.3.5 Chief Public Affairs Officer

The Chief Public Affairs Officer will support the Safety Management System of the organization and promote a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The Chief Public Affairs Officer is required to play an active role in the safety risk management process to ensure that safety assurance and communication are supported and will be responsible for the identification of hazards and any corrective actions as deemed appropriate. The Chief Public Affairs Officer will document and address any related concerns in the Public Affairs Department. This position will serve as an active member of the Emergency Response Team (ERT) and will be the staff advisor for their department. The Chief Public Affairs Officer will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.3.6 Chief People Officer (Human Resources)

The Chief of People will support the Safety Management System of the organization and promote a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The Chief of People is required to play an active role in the safety risk management process to ensure that safety assurance and communication are supported and will be responsible for the identification of hazards and any corrective actions as deemed appropriate. The Chief of People will document and address any related concerns in the Human Resources Department. This position will serve as an active member of the Emergency Response Team (ERT) and

[3] In accordance with 49 CFR Part 673

will be the staff advisor for their department. The Chief of People will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.3.7 Chief Legal Officer

The Chief Legal Officer will support the Safety Management System of the organization and promote a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The Chief Legal Officer is required to play an active role in the safety risk management process to ensure that safety assurance and communication are supported and will be responsible for the identification of hazards and any corrective actions as deemed appropriate. The Chief Legal Officer will document and address any related concerns in the Legal Department. This position will serve as an active member of the Emergency Response Team (ERT) and will be the staff advisor for their department. The Chief Legal Officer will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.3.7 Chief Development Officer

The Chief Development Officer will support the Safety Management System of the organization and promote a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The Chief Development Officer is required to play an active role in the safety risk management process to ensure that safety assurance and communication are supported and will be responsible for the identification of hazards and any corrective actions as deemed appropriate. The Chief Development Officer will document and address any related concerns in the Planning and Capital Projects Department. This position will serve as an active member of the Emergency Response Team (ERT) and will be the staff advisor for their department. The Chief Development Officer will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.3.8 Chief Information Officer

The Chief Information Officer will support the Safety Management System of the organization and promote a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The Chief Information Officer is required to play an active role in the safety risk management process to ensure that safety assurance and communication are supported and will be responsible for the identification of hazards and any corrective actions as deemed appropriate. The Chief Information Officer will document and address any related concerns in the Information Technology Department. This position will serve as an active member of the Emergency Response Team (ERT) and will be the staff advisor for their department. The Chief Information Officer will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.3.9 Director of Governance and Audit

The Director of Governance and Audit will support the Safety Management System of the organization and promote a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The Director of Governance and Audits is required to play an active role in the safety risk management process to ensure that safety assurance and communication are supported, and will be responsible for the identification of hazards and any corrective actions as deemed appropriate, and the Director of Governance and Audits and Internal Audit

will document and address any related concerns in the Governance and Audit Department. This position will serve as an active member of the Emergency Response Team (ERT) and will be the staff advisor for their department. The Director of Governance and Audit will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.3.10 Chief Financial Officer-CFO

The Chief Financial Officer (CFO) will support the Safety Management System of the organization and promote a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The Chief Financial Officer, CFO, is required to play an active role in the safety risk management process to ensure that safety assurance and communication are supported, and will be responsible for the identification of hazards and any corrective actions as deemed appropriate, and the Chief Financial Officer, CFO, will document and address any related concerns in the Finance Department. This position will serve as an active member of the Emergency Response Team (ERT) and will be the staff advisor for their department. The Chief Financial Officer, CFO, will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.3.11 Executive Director of the IndyGo Foundation

The Executive Director of the IndyGo Foundation will support the Safety Management System of the organization and promote a positive safety culture. This position will be responsible for delivering quality public transportation service that is as safe to the extent possible. The Executive Director of the IndyGo Foundation is required to play an active role in the safety risk management process to ensure that safety assurance and communication are supported, and will be responsible for the identification of hazards and any corrective actions as deemed appropriate, and the Executive Director of the IndyGo Foundation will document and address any related concerns in the IndyGo Foundation Department. This position will serve as an active member of the Emergency Response Team (ERT) and will be the staff advisor for their department. The Executive Director of the IndyGo Foundation will also be responsible for ensuring the safety of their employees, contractors, and visitors to IndyGo.

2.4 Safety and Security Committee

The Indianapolis Public Transportation Corporation, dba IndyGo, is committed to providing a safe work environment. To prevent workplace injuries and illnesses, a joint management-labor Safety and Security Committee has been established. Employee involvement is necessary to ensure a safe and healthy workplace.

The purpose of the IndyGo Safety and Security Committee is to involve labor and management throughout the organization in an open, healthy, non-adversarial, cooperative effort to promote a safety culture in the workplace. The Safety and Security Committee will jointly work with IPTC's Executive Leadership Team to establish recommendations for changes to corporate practices to promote a safe and secure workplace. Bipartisan Infrastructure Law changes to 49 U.S.C § 5329(d):

(5) Safety Committee. —

(A) In general. —For purposes of this subsection, the safety committee of a recipient shall— 39

(i) be convened by a joint labor-management process;

(ii) consist of an equal number of—

(I) frontline employee representatives, selected by a labor organization representing the plurality of the frontline workforce employed by the recipient or, if applicable, a contractor to the recipient, to the extent frontline employees are represented by labor organizations; and

(II) management representatives; and

(iii) have, at a minimum, responsibility for—

(I) identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment;

(II) identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and

(III) identifying safety deficiencies for purposes of continuous improvement.

(B) Applicability. —This paragraph applies only to a recipient receiving assistance under section 5307 that is serving an urbanized area with a population of 200,000 or more.

Under the new Bipartisan Infrastructure Law requirements, the Safety and Security Committee must establish these targets using a 3-year rolling average of the data the agency submits to the National Transit Database (NTD).

Required Safety Risk Reduction Program Measure		Description
1	Major Events	This includes all major safety and security events as defined by the NTD.
2	Major Event Rate	This includes all major safety and security events as defined by the NTD, divided by VRM.
3	Collisions	This includes all collisions reported to NTD.
4	Collision Rate	This includes all collisions reported to NTD, divided by VRM.
5	Injuries	This includes all injuries as defined by the NTD
6	Injury Rate	This includes all injuries as defined by NTD, divided by VRM.
7	Assaults on Transit Workers	This includes all assaults on transit workers as defined by the NTD
8	Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD, divided by VRM.

** VRM - Vehicle revenue miles are calculated per 100,000 miles.*

2.4.1 Safety and Security Committee

The establishment and operation of a Safety Committee are appropriately scaled to the size, scope, and complexity of the transit agency. The Committee is chaired by the Director of Risk and Safety and co-chaired by an active union member whom the Local ATU President selects. The Safety Committee was convened by a joint labor-management process, which is comprised of an equal number of frontline employee representatives, selected by the union representing the frontline workforce employed by IndyGo, and management representatives. To the extent possible, the Safety Committee includes

frontline transit worker representatives from major transit service functions across the transit system, such as operations, maintenance, and other represented and non-represented departments.

The primary goals and objectives of the Safety and Security Committee are outlined below within federal regulations.

The Bipartisan Infrastructure Law directs that performance measures for a risk reduction program, required under 49 U.S.C. 5329(d)(4), be included in the NSP (49 U.S.C. 5329(b)(2)(A)). The NSP identifies the following eight measures for the risk reduction program. The Safety Committee of IndyGo will use these measures to set targets for the safety risk reduction program, as required by 49 U.S.C. 5329(d). Under the new Bipartisan Infrastructure Law requirements, the Safety Committee must establish these targets using a 3-year rolling average of the data the agency submits to the National Transit Database (NTD).

Required Safety Risk Reduction Program Measures:

- Major Events - This includes all safety and security major events as defined by the NTD.
- Major Event Rate - This includes all major safety and security events as defined by the NTD, divided by VRM.
- Collisions - This includes all collisions reported to NTD.
- Collision Rate - This includes all collisions reported to the NTD, divided by VRM.
- Injuries - This includes all injuries as defined by the NTD.
- Injury Rate - This includes all injuries as defined by the NTD, divided by VRM.
- Assaults - on Transit Workers This includes all assaults on transit workers as defined by NTD.
- Rate of Assaults on Transit Workers - This includes all assaults on transit workers as defined by the NTD, divided by VRM.
- Bus Rapid Transit (BRT) System Updates/Capitol Projects. - Review construction updates on BRT Lines. Evaluate the performed risk assessments.
- Security Events.
- Identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment.
- Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended.
- Identifying safety deficiencies for purposes of continuous improvement.
- Identifying safety deficiencies for continuous improvement.
- Reviewing safety hazards and security vulnerabilities identified through analyses, assessments, design reviews, and other mechanisms to ensure that they are being fully addressed.
- Track the status of identified hazards and vulnerabilities.
- Issuance of reports on Committee activities and outstanding issues.
- Coordinates and ensures final Safety and Security Certification Verification reports are signed and issued before revenue operations.
- Involved in the annual Threat Vulnerability Assessment (TVA).
- Quarterly Emergency Management Drills.

2.4.2 Safety Committee Roles and Responsibilities

The committee is expected to meet monthly/quarterly. Time dedicated to the charter positions will be paid for the additional time dedicated to the charter committee. Specific tasks will have an acceptable time allowed and be discussed within the meetings.

Employee representatives shall be volunteers, elected by their peers, or appointed by the union. Employer representatives will be appointed. Safety committee members will serve terms of at least one year, up to three years if available. Committee membership terms will be staggered, so experienced members are always serving on the committee.

Committee Members: Committee members will be expected to spend sufficient time each month/quarter conducting safety committee-related activities. Committee members will be paid for their time working on Safety Activities, reflected in the normal pay process of the department. Activities will include:

- Attend committee meetings.;
- Meet as often as necessary to complete work on committee projects.
- Participate in safety audits.
- Keep the discussion during committee meetings on safety and security issues.
- Consider each proposal carefully, no matter how trivial it may seem, and allow enough time for full consideration.
- Be assigned action items for issues the committee may not be able to resolve during a meeting.
- Be knowledgeable and representative of all areas of assigned representation.
- Provide visible leadership in and commitment to safety and security.
- Establish clear lines of communication with the departmental area of representation.
- Conduct or support safety moments at each department-sponsored event.
- Review and evaluate accident reports and near misses. Elements to be evaluated:
    - Timeliness – reported by employee and paperwork submitted.
    - Use of proper forms
    - Accuracy and completeness of the information
    - Are there appropriate recommendations for prevention or corrective actions?
- Make recommendations for improvement of the accident investigation process.
- Participate in the monthly building inspections, so all facilities are inspected annually.
- Report on unsafe conditions and practices.
- Review building security issues.
- Review and recommend safety policies.
- Identify trends.
- Recommend ideas for improving safety and security.
- Work safely and healthily.
- Complete assignments are given to them by the chair.
- Create and promote open communication in an atmosphere of honesty, trust, and respect.
- Monitor the progress of recommendations and corrective actions.
- Recognize and support the contributions of each person.

Committee Chair: The committee chair will be expected to: There may be co-chairs for the Safety Committee; one will be the designated Safety Administrator, and the other will be elected by the committee. The following are the duties of the chair(s):

- Set the meeting date, time (normal day shift), and location.
- Set the agenda.
- Facilitate the meeting.
- Assign a record-keeper.
- Post minutes on the HR website
- Notify members, supervisors, managers, and directors when minutes are posted.
- Schedule regular committee meetings
- Develop written agendas for conducting meetings.
- Conduct the committee meeting in a structured manner.
- Approve committee correspondence and reports.
- Supervise the preparation of meeting minutes.
- Be the primary point of contact for Safety and Security concerns.
- Attend meetings of the Safety and Security Committee

In the absence of the Committee Chairperson, these responsibilities will be assigned to an alternate to be elected by the group at the beginning of the meeting.

2.4.3 Safety Committee Agendas, Notices, Meeting Minutes, and Record-Keeping

All employees are welcome to attend the Quarterly Safety and Security Committee meetings. The committee charter members encourage employees to identify workplace safety hazards. Employees are to present concerns in writing or in person to a charter committee member. The committee shall address serious issues immediately and may call an emergency meeting for these concerns. The committee shall respond to all employee concerns in writing and include the response in the meeting minutes.

The agenda will prescribe the order in which the committee conducts its business. The agenda will also include the following when applicable:

- A review of new safety and/or security concerns (including any work order status)
- A status report on employee safety and/or security concerns under review
- A review of all near misses, incidents, or injuries occurring since the last committee meeting.
- A review of the Risk Reduction Program data points.

Minutes will be recorded at each committee meeting and distributed to all committee members. The committee will submit a copy of the minutes to the meeting facilitator or appointed position to post within 2 weeks of the meeting. IPTC Risk and Safety will retain minutes for three years. The minutes will include all reports, evaluations, and recommendations of the committee. The minutes will also identify representatives who attended and those who were absent.

Robert's Rules of Order will be used for the format of motions and voting. Fifty percent of voting representatives constitute a quorum; a majority vote of attending representatives is required to

approve all Safety and Security Committee decisions or motions. The committee will report any impasse or issues not resolved by a majority vote to the Accountable Executive, including leadership from ATU 1070, and they will continue to work on the open issue.

The Safety and Security Committee advises the Executive Leadership Team about safety and security issues in the workplace. All written recommendations from the Safety and Security Committee will be submitted to the Accountable Executive and then to the appropriate division leadership. Management will consider the recommendations and respond in writing to the safety committee within a reasonable time of 2 weeks. Recommendations shall be concise and clear and provide reasons for implementation. Recommendations may also be a pilot or practices that will be reevaluated later before being implemented permanently by the Accountable Executive.

Changes to Safety or Security practices will be published internally through one or more e-mails, posted memos, electronic TV displays, posted on the SMS Safety Communication boards located in the break rooms, and or an automated messaging system sent to the cell phone numbers reported to HR.

New representatives will receive training in safety committee functions, hazard identification, accident-investigation procedures, and laboratory inspections provided by Environmental Health and Safety.

2.4.4 Executive Leadership Team

IndyGo takes an initiative-taking approach to system safety by identifying and assessing system-wide safety and security issues in the Executive Leadership Team meetings. The Executive Leadership Team has been established to facilitate safety and security coordination among IndyGo departments. Chaired by the CEO of IndyGo, the Executive Leadership Team is charged with the responsibility of assisting in maintaining a prominent level of system safety and security. The Executive Leadership Team brings together the common sense, technical expertise, and unique perspectives of a variety of staff to focus on system safety and security issues. The Executive Leadership Team functions as the interdepartmental unit empowered to lead IndyGo in hazard management efforts. The Executive Leadership Team assesses system-wide safety and security issues and verifies that safety and security are considered and incorporated into any new procedures, training programs, facilities, and designs.

This committee meets monthly and supports Safety in the following:

- Determining safety and security compliance with management policies, rules, procedures, and assigned security responsibilities;
- Reviewing and discussing identified hazards and status of activities to resolve, including review of supporting documentation (e.g., hazard tracking log, hazard investigation reports, and inspection reports);
- Reviewing safety and security data, information, and trends, and identifying organizational issues that may contribute to events or less effective responses to events;
- Actively promoting safety and security campaigns;
- Reviewing drills, exercise scenarios, and after-action reports;
- Proposing improvements in safety and security procedures, equipment, and training;
- Assessing safety and security impacts of the facility and/or operational changes;

- Annual review and revision, as needed, of the Safety Plan, as well as assuring its implementation;
- Monitoring compliance of each department with specific safety responsibilities and procedures as outlined in the Safety Plan by reviewing the results of safety audits conducted by the Safety Department;
- Participating in accident/event investigations as appropriate and in accordance with IndyGo's established procedures. The type of accident/event dictates who investigates the accident/event, the appropriate forms or reports to be used, and who is to be notified.
- Performing system safety review functions as required. Coordinating and following up with any external safety audits and participating as required.
- Collecting, analyzing, and reporting safety data. Reviewing maintenance and failure rate data to identify safety problems;
- Reviewing results of safety inspections, emergency drills, simulations, and tests, and developing action as appropriate;
- Preparing written documentation for all meetings, tasks, activities, investigations, analyses, and recommendations. Following up on all matters pending;
- Establishing safety goals and objectives as defined by the IndyGo employee safety program; and
- Resolving field-related operating issues that may require a change, modification, and/or addition to fixed safety/operational assets and/or operating procedures because of accidents, events, or field observations that relate to day-to-day safe and secure operations.

Executive Leadership Team members include:

Title	Position
CEO of IndyGo	Chair
Chief Operations Officer-COO	Member
Chief Financial Officer -CFO	Member
Chief Information Officer	Member
Chief Development Officer	Member
Chief Public Affairs Officer	Member
Chief Legal Officer	Member
Chief People Officer	Member
Chief Government Affairs Officer	Member
Executive Director- The IndyGo Foundation	Member

The following sections and Table B in Chapter 2 describe the Safety Plan Implementation, including tasks and activities.

2.5 Safety Department Activities Required to Implement Safety Management Program

To achieve continuous improvement in safety as outlined in this document, IndyGo performs the following safety risk management, safety assurance, and safety promotion activities through its safety department to support other departments in meeting their obligations under SMS:

- conducts OSHA/FTA- and mandated internal safety audits;
- Conduct safety and security inspections at all facility locations;
- Perform investigations of all major accidents involving employees/equipment
- Conduct investigations of safety complaints, concerns, and reports
- Prepare reports on noteworthy events;
- Participates in safety committees, including the Executive Leadership Team, and performs follow-up on safety committee issues;
- Training maintenance employees in industrial/occupational safety requirements;
- Liaisons with local, state, and federal responders and agencies concerning emergency responses to events involving mass transit;
- Supports the development, review, and revision of safety-related Standard Operating Procedures (SOPs) in conjunction with Operations and Maintenance Departments; and develops, reviews, and revises SOPs for the safety department functions.
- Participates in all committees for construction projects;
- Conduct safety inspections during construction projects;
- Assists IndyGo management with safety issues.
- participates in the Safety and Security Certification process for all capital projects;
- Reviews and comments on any changes to safety elements within IndyGo, Paratransit, and the Bus system;
- Review trend safety data provided by departments and provided feedback to ensure departmental compliance with SMS data requirements.
- Participates in the development and implementation of system emergency drills;
- Facilitates monthly IndyGo and Paratransit Safety Meetings;
- Participates in informal meetings with the CEO as appropriate, on safety issues;
- Provides full support and coordination on SMS implementation agency-wide;
- Ensure continuous safety improvement through support activities for all departments; and
- Provides oversight activities for internal SMS assessments by each department.

2.6 Safety Tasks by Position

2.6.1 Director of Risk and Safety

The Director of Risk and Safety acts as the Chief Safety Officer at IndyGo. The following tasks are required for this position:

- Directing and monitoring the SMS program at IndyGo and ensuring immediate corrective action is implemented for failures of the SMS. The Director of Risk and Safety (CSO) direct the work of the Risk and Safety Manager and Risk and Safety Specialists.
- Providing monthly status reports to the CEO on items of immediate concern and quarterly reports on SMS compliance agency-wide

- Providing information, recommendations, and status reports to the CEO on resource allocation supporting SMS compliance at IndyGo;
- Ensuring sufficient labor and equipment resources are adequately deployed at IndyGo to meet SMS requirements, and informing the CEO of any deficiencies in this critical area;
- Reports monthly to the Executive Leadership Team meetings to address system hazards and other safety concerns;
- Provides primary consultation and guidance on SMS implementation throughout the agency.
- Provides monthly reports to the CEO on SMS compliance agency-wide;
- Overseas and supports departmental assessments, investigations, inspections, observations, and other Safety Assurance activities to ensure full compliance with SMS;
- Participates in informal meetings with MPO, Chief Executive Officer, COO, and other IndyGo management on safety issues;
- Assists in and supports the development of safety policies, procedures, and programs;
- Supervises and oversees the work of assigned safety staff, conducts performance reviews with staff, and initiates appropriate actions related to such;
- Serves as IndyGo's main contact with MPO and other agencies related to safety programs and procedures. Prepare records, documents, and data required by such agencies;
- Supports the departmental investigations of employee and vehicle accidents/events and injuries; works with Operations Training and Maintenance Training to develop programs to reduce accidents and injuries.
- conduct inspections and research safety codes, standards, and regulations;
- Supports the departmental collection and analysis of safety data and statistics, and reviews reports, records, and documents of this analysis by departments. Ensures each department distributes its data/analyses to all other departments in a timely and accurate fashion;
- Coordinates staff safety meetings and attends meetings, conferences, and group functions related to safety;
- Assists in the development of training sessions relating to safety issues.
- Identifies safety concerns, analyzes reports and information, supports the development of programs for accident injury prevention, and provides recommendations to reduce the frequency of accidents.
- Assists in claim investigations of work-related injuries or disabilities; assists in the preparation of files for litigation.
- Establishes and implements effective industrial hygiene and occupational policies and procedures for operating and maintenance functions;
- Recommends, monitors, and evaluates IndyGo compliance activities with federal/state safety and health laws, hazardous waste management plans, and environmental standards and regulations;
- Establishes criteria for the selection, maintenance, and proper use of personal protective clothing and equipment;
- Participates in the development of training programs for Right-to-Know and Hazardous Materials Management and other regulatory-mandated training.

- Oversees development and maintenance of industrial hygiene, occupational management databases, and computer information systems, and
- Ensure the investigation of safety concerns is reported to the Safety Department.
- Monitors and maintains policy, and conducts training on IndyGo's Drug and Alcohol Program

2.6.4 Manager of Risk and Safety

The Risk and Safety Manager:

- Assists the Director of Risk Safety in safety training and serves as an advisor on issues related to system procurement and safety awareness;
- Assists Operations and Maintenance Directors and Managers with daily safety issues;
- Supports departments and the Director of Risk and Safety in the development and implementation of accident and injury prevention policies, procedures, and programs;
- Supports departmental investigation of employee and vehicle accidents, events, and injuries, identifying potential hazards for resolution. Completes reports to document investigative findings and conveys recommendations to prevent reoccurrence or resolution;
- Develops, coordinates, and conducts training sessions relating to employee right-to-know and hazard waste awareness, emergency evacuation, accident investigations, public safety/ emergency response, and others as required;
- Coordinates and conducts department safety meetings; attends meetings, conferences, and group functions related to safety.
- Reviews all safety data analysis provided by departments and provides comments and directions to departments on identifying and addressing safety trends.
- Maintains a current level of proficiency regarding safety codes, standards, regulations, and technological advances;
- Participates in technical advisory committees in engineering design reviews, construction/contractor safety activities, and general safety oversight regarding capital projects/ improvements;
- Provides technical support in claims investigations of work-related injuries or disabilities;
- Supports departmental investigations of employee and vehicle accidents, events, and injuries; assists in developing programs to reduce injuries.
- Conducts SMS compliance audits and inspections, and research safety codes, standards, and regulations;
- Coordinates safety meetings at locations and attends meetings, conferences, and group functions related to safety;
- Identifies health and safety concerns, analyzes reports and information, develops programs for accident/injury prevention, and submits recommendations to reduce the frequency of accidents.
- Assists in claim investigations of work-related injuries or disabilities and prepares files for litigation; and
- Identifies safety and health concerns and issues and participates in the design and implementation of safety policies and procedures.
- Updates information on the Employee Safety Promotion Bulletin Board

2.6.5 Risk and Safety Specialists

- Investigates and reports on complaints, events, accidents, and hazards as required;
- Performs documentation audits for compliance with SMS.
- Provides support for the Risk and Safety Department.
- Collects and analyzes data and performs trend analysis;
- Provides safety messages to all operators.
- Conducts safety meetings/training;
- Performs safety inspections: Facility & Shop, mainline & work site, and a construction site;
- Participates in IndyGo and Paratransit activities and attends monthly meetings; and
- Develops and performs safety-related training.

2.7 System Safety Task Matrix

The remainder of this section describes in matrix and narrative format the specific activities required to implement the Safety Management program.

Table B System Safety Task Matrix

Safety Tasks by Functional Area	Executive	Maintenance	Operations	Safety	Finance	Engineering	Executive Leadership	Frequency
Develop a system safety policy statement.	A	S	S	P	S	S	S	**AR**
Develop Safety Plan	A	RC	RC	P	S	S	RC	**AR**
Update Safety Plan	A	RC	RC	P	S	S	RC	**Yearly**
Liaison with the MPO	S	S	S	P	S	S	S	**AR**
Conduct internal safety audits.	A	P	P	P	P	P	S	**Yearly**
Develop emergency response plans.	A	P	P	P	S	S	S	**AR**
Investigate, document, and report all accidents/events.	S	P	P	S	S	S	S	**AR**
Collect, analyze, document, distribute, and review safety data	RC	P	P	P	P	P	S	**Daily**
A report required threshold accidents to outside agencies (MPO, FTA, NTSB)	A	S	S	P	S	S	S	**AR**
Hazard management	S	P	P	S	P	P	P	**AR**
Configuration management	S	P	P	S	P	P	P	**AR**
Safety and security certification	S	S	S	P	S	P	S	**AR**
Training Functions	S	P	P	P	P	P	S	**AR**
Design reviews	S	S	S	S	S	P	S	**AR**
Occupational safety and health programs	S	P	P	P	S	P	S	**AR**
Implement SMS	P	P	P	P	P	P	P	**Daily**

Review the IndyGo SSMP plan.	P	S	P	P	S	S	P	**AR**

Responsibility: Participants are responsible, as shown in the matrix, for:

A **Approval – approving specified documentation**

P **Primary Task – including preparation of the specified documentation.**

S **Secondary/Support -- Provide the necessary support to accomplish and document tasks.**

RC **Review & Comment -- Review and provide comments on the task or requirement.**

Frequency:

(D) Daily, (M) Monthly, (Q) Quarterly, (Y) Yearly, and (AR) As Required.

2.8 Key SMS Personnel and Responsibilities

Within IndyGo, each department/functional area provides distinct roles and carries out specific safety management responsibilities to ensure the protection of passengers, employees, emergency responders, the community served, and IndyGo's property.

Safety management responsibilities by department/function are summarized in the following table:

Table C
Key SMS Personnel by Department with System Safety Management Accountability

Department/Functional Area	Specific Position(s) with Safety Management Accountability / Key Departmental SMS Personnel
Human Resources	**Chief People Officer**
Safety	**Director of Risk and Safety**
Marketing and Communications, Public Information	**Chief Public Affairs Officer**
Bus Operations	**Chief Operating Officer**
Paratransit Operations	**Deputy Chief of Transit Operations**
Operations Training	**Deputy Chief of Transit Operations**
Scheduling and Service Planning	**Director of Service Planning**
Vehicle Maintenance	**Director of Vehicle Maintenance**
Facility Maintenance	**Director of Facilities**
Finance	**Chief Financial Officer**
Procurement	**Senior Director of Procurement**
IT	**Chief Information Officer**
Engineering	**Chief Development Officer**

Key SMS Personnel are responsible for ensuring their departments are in full compliance with IndyGo's SMS program as described herein and in supporting documentation. They will perform Safety Assurance activities, including documentation, internal controls, monitoring, and auditing of their departmental compliance with this Safety Plan, and other supporting programs, plans, and procedures. The Risk and Safety Department is responsible for supporting each of the departments in these efforts.

2.8.1 President and CEO of IndyGo

SMS is a management system. It requires the attention of the highest management official and is a tool for the executive to ensure that all employees know and understand that safety is not the responsibility of a "safety department," but is the responsibility of every employee in every department.

IndyGo's Accountable Executive is the President and CEO of IndyGo.

- The Accountable Executive has ultimate responsibility for establishing and maintaining the SMS for IndyGo. The CEO is also responsible for:
- Ensure safety concerns are considered in IndyGo's ongoing budget planning process.
- Ensure transparency in safety management priorities for the Board of Directors and the employees;
- Establish guidance on the level of safety risk acceptable to the agency; and
- Ensure the safety management policy statement is appropriate and communicated throughout the agency.

2.8.2 Chief People Officer (Human Resources)

- Develop position descriptions that address safety-related restrictions and requirements;
- Develop and administer medical standards for specific job positions, as warranted;
- Ensure that successful candidates for positions are capable of safely performing the tasks of these positions on a repetitive basis.
- Administer the application of IndyGo's employee discipline policy;
- Provide oversight and follow-up of site visits by health professionals (e.g., in connection with IndyGo's drug and alcohol testing program);
- Maintain complete and current documentation in personnel files, including HIPAA records for Drug & Alcohol compliance;
- Ensure employees are screened before employment in compliance with all FTA and MPO requirements; and
- Assist Maintenance and Operations in training program development.

2.8.3 Chief Public Affairs Officer

- Act as a source of information to the public and news media during an emergency;
- Coordinate the dissemination of information to IndyGo employees and document all functions and activities during emergencies;
- Provide public information during emergencies to ensure the safety and security of passengers.
- Provide public information on safety and security for regular operations.
- Collect information from the public regarding safety, security, hazards, and safety events, and properly route information for optimal hazard resolution; and

- Work closely with all departments to effectively manage safety information.

2.8.4 Director of Security

- Participate in safety and security committees;
- Assist in the coordination of internal safety and security audits;
- Participate in emergency response drills as required.
- Assume the role of Incident Commander when the emergency/event is a potential or actual crime zone;
- Coordinate crowd control and assist with the evacuation of customers and/or employees;
- Coordinate traffic control and security within and around the emergency/event sites;
- Coordinate with local, state, and federal emergency operations agencies; and
- Address hazards as appropriate with the Director of Safety.

2.8.5 Chief Operations Officer

Responsible for the following functions: safety in bus and paratransit operations, operations training, and scheduling and service planning. In addition, this position negotiates, interprets, and administers various collective bargaining agreements and provides direction to line management in all matters concerning labor and employee relations, including management of all committee activities between labor and management.

Operations

- Administer and monitor standardized programs, policies, and procedures;
- Coordinate daily activities of dispatchers, clerks, and secretaries;
- Implement and monitor IndyGo's Drug and Alcohol Program;
- Ensure that preventive maintenance, running repairs, housekeeping, and vehicle servicing are performed safely;
- Ensure that Bus/Paratransit staff adhere to established standard operating procedures, bulletins, rules, and the processes set out in the Safety Plan;
- Take appropriate actions to resolve identified hazards promptly.
- Assist in the coordination of internal safety audits and participate in emergency response drills as required;
- Monitor bus operations using field supervision and radio dispatching;
- Ensure effective response during emergencies as required by circumstances;
- Assist in accident investigations as required; and
- Serve on the Operations, Safety, and Security Review Committee.
- Ensure the safety and security of IndyGo operations.
- Recommend development of industrial, occupational, and environmental safety management goals;
- Ensure compliance with company and safety-related programs, policies, procedures, bulletins, and the Safety Plan;
- Support the internal safety and security audits and participate in emergency response drills as required;

- Continuously identify any operating hazards that require formal implementation of the Hazard Management Process.

Training

- Train and qualify new operators on routes and equipment operation, pre-trip inspection, emergency procedures, and injury and illness prevention;
- Perform re-training following accidents & occupational injuries as warranted; and Coordinate with the Director of Risk and Safety to incorporate IndyGo's safety policy, rules, and procedures in verbal instructions and direct training.

Scheduling and Service Planning

- Under the guidance of the Director of Service Planning, ensures that service delivery schedules allow sufficient running time for safe operations at speed limits and adequate recovery time for bus and paratransit operators;
- Investigate operator complaints of insufficient running time.
- Develop work runs and schedule relief by collective bargaining agreements and regulatory requirements;
- Develop marketing tools to increase the transit safety awareness of riders and others encountering IndyGo;
- Develop and implement community outreach programs promoting the safe use of IndyGo services;
- Maintain liaison with media following accidents and emergencies; and
- Ensure operational safety of stops, shelters, route design, and layover/recovery areas.

Vehicle Maintenance

The Deputy Chief of Fleet, Maintenance & Facilities is responsible for assisting in ensuring safety in the following areas:

- Vehicle Maintenance
- Fleet Services
- Facilities

Transit Asset Management Program & State of Good Repair

- IndyGo has developed the required performance measures under the requirements of 49 CFRs 625 & 630. Currently, IndyGo is fully compliant with the Transit Asset Management Plan (TAMP), including its state of good repair for rolling stock, equipment, infrastructure, and facilities.

Special Projects

- Handle special maintenance projects, including those with safety-related impacts, as required.

Maintenance Training

- Ensure proper training of all new mechanics and technicians to inspect, maintain, and repair the Authority's fleet safely and effectively.
- Ensure proper training of maintenance staff in emergency/safety procedures and injury and illness prevention as appropriate.

Maintenance

- Assure that the fleet is properly maintained and available in safe operating condition according to IndyGo's procedures;
- Provide necessary mechanisms for reporting defects and hazardous conditions.
- Coordinate with the Director of Risk and Safety on system safety requirements.
- Administer and monitor standardized programs, policies, and procedures;
- Administer safety programs for department employees;
- Monitor the collection and disposal of waste (e.g., oils, clarified wastewater sludge) to affect safe handling and minimize employee and environmental exposure to potentially hazardous products and materials;
- Ensure appropriate action to resolve reported or otherwise identified hazards promptly. As appropriate, coordinate the development and testing of engineering solutions as a means of addressing vehicle-related hazards; and
- Coordinate with the Director of Risk and Safety in the development and implementation of risk reduction measures associated with the operation and maintenance of IndyGo's revenue vehicles.

Bus/Paratransit/Non-Revenue Maintenance

- Coordinate safety-related activities of the bus maintenance staff and ensure compliance with the Safety Plan;
- Oversee field maintenance programs and practices and ensure compliance with the Safety Plan;
- Ensure that programs, retrofits, major repairs, and maintenance practices are performed safely and monitored for safety-related issues;
- Ensure that functions comply with the Safety Plan.
- Monitor body and paint, mechanical repairs, and component rebuild activities for quality;
- Coordinate and monitor the Vehicle Improvement program, and all off-property repairs;
- Assist in the accident investigation process as required.
- Arrange the removal of defective or damaged equipment
- Ensure preventive and corrective maintenance of IndyGo's non-revenue fleet;
- Ensure body and mechanical repairs, excluding major hydraulic and components, on all of the non-revenue vehicles;
- Schedule and coordinate preventive maintenance activities;
- Maintain vehicle records;
- Assist the Safety Department in conducting safety-fire inspections and correcting any identified safety deficiencies;
- Assure that the communications electronic systems are properly maintained and operational daily. Ensure that equipment follows manufacturer specifications, federal requirements, and directives;
- Ensure all emergency communications electronic equipment follows organizational requirements, along with the associated guidelines. Ensure that applicable safety practices and procedures are adhered to relative to the communications and electronic service industry and
- Maintain IndyGo radios and fare boxes.

Quality Assurance

- Where applicable, participate in the development of technical equipment specifications and procedures that address the safety requirements of regulatory agencies and IndyGo. Ensure that replacement equipment meets safety requirements before acceptance. Examine equipment and systems to explore the potential for increased efficiencies and improvements in user and fire safety as well as in performance.
- Administer warranty programs;
- Coordinate major equipment rebuild, repair, and retrofits;
- Ensure the performance of inspection and testing activities necessary to ensure that equipment, supplies, and operations result in the desired level of safety;
- Monitor the performance of preventive maintenance efforts.
- Stop work on all unauthorized modifications.
- Establish and maintain current drawings for IndyGo facilities and systems;
- Analyze equipment failures and identify trends;
- Document equipment and facility modifications and inform affected staff of these modifications; and
- If appropriate, participate with the Safety Department in accident investigations and develop findings and recommendations.

Inventory

- Monitor procurement practices to ensure that safety is not compromised in replacing parts.
- Monitor human-machine interfaces and
- Ensure IndyGo stocks quality parts and provides specifications and quality assurance for parts and materials.

2.8.7 Hazardous Materials

It is the responsibility of IndyGo to minimize and control the generation of hazardous waste and pollutants to protect the environment during maintenance operations. All IndyGo activities must comply with applicable federal, state, and local environmental protection laws. Procedures have been established in IndyGo's Hazardous Materials Program to control hazards associated with the procurement, storage, transfer, use, and disposal of hazardous substances. Methods used in this process include product and substance evaluations, procurement procedures, monitoring, testing, inspections, and training.

IndyGo compliance includes Safety Data Sheets (SDS) and procedures regarding chemical labeling, chemical disposal, and employee notification (i.e., right-to-know). Affected employees receive annual Right-to-Know and Hazardous Waste Awareness Training.

Records of training are maintained by the training department. The Director of Risk and Safety is responsible for all required reporting for compliance.

IndyGo satisfies the program requirements through the following comprehensive process:

- Process complies with applicable federal, state, and local environmental protection laws;

- Process includes established procedures to control hazards associated with the procurement, storage, transfer, use, and disposal of hazardous substances;
- The process includes methods such as product and substance evaluations, procurement procedures, monitoring, testing, inspections, training, record keeping, and reporting requirements.
- The process also includes procedures for Safety Data Sheets and chemical labeling, chemical disposal, employee notification, and
- The process includes employee awareness training.

2.8.7 Finance

The Chief Financial Officer ensures the following critical activities occur:

- Facilitate the achievement of Safety Plan objectives through preparation and control of IndyGo's budget and staffing level recommendations;
- Manage and maintain the safety of IT systems and fare collection processes;
- Ensure necessary funding for safety programs/projects;
- Ensure that equipment purchased by IndyGo meets safety requirements and that design requirements have been coordinated with all appropriate departments.
- Perform technical maintenance for accident record keeping, employee injury reporting forms, and related accident data as required;
- Provide claims administration;
- Ensure that the procurement process complies with established procedures for evaluating materials and products for use by IndyGo.
- Ensure that all contracts comply with IndyGo's Safety Plan and all federal, state, and local fire/safety regulations;
- Include safety requirements in contracts such that contractors must meet all applicable state, federal, and local regulations as well as IndyGo's requirements;
- Develop and maintain a list of hazardous materials and equipment;
- Enforce safety procedures related to hazardous substance acquisition, handling, labeling, storage, disposal, and record keeping;
- Ensure the Internal Audit department performs financial audits as required.

2.8.8 Engineering

The Chief Development Officer ensures the following critical activities take place:

- Administer/monitor construction contracts to ensure that contractor procedures conform with current MPO and OSHA regulations and that the results are safe for IndyGo and/or public use;
- Monitor the installation of facilities, systems, and equipment to ensure compliance with contractual requirements and procedures;
- Write technical specifications;
- Coordinate communications concern relative to joint missions and training exercises with local municipalities;
- Approve any new, upgraded, or modification of communications or electronic systems;
- Conduct environmental impact studies;

- Provide Emergency response to hazardous waste, chemical spills, and/or other issues required by regulation;
- Oversee design and engineering consulting services and construction contracts;
- Report and make recommendations to the IndyGo President and CEO and IndyGo's Board on major capital projects;
- Participate in reporting to IndyGo's Executive Leadership Team and the Safety and Security Committee as appropriate;
- Coordinates capital program matters and activities with communities, governmental agencies, regulatory agencies, and funding agencies;
- Program and schedule major capital project tasks;
- Manage hazard and vulnerability processes for capital projects.
- Establish and maintain current drawings for capital project facilities and systems;
- Develop project-specific safety and security plans and milestones.
- Monitor implementation of project-specific safety and security plans, activities, and responsibilities'
- Monitor environmental and chemical compliance with local, state, and federal regulations for capital projects.
- Provide capital budget analysis.
- Provide document control for capital projects and
- Provide configuration management for capital projects.

2.9 SMS Reporting

IndyGo understands the importance of continuous monitoring and reporting of the status of the SMS program. To this end, the following formally documented reporting is required:

- Each month, a monthly report is due to the CEO and Director of Risk and Safety from each functional Department/Area on the status of:
    - Deficiencies, failures, and corrective actions for
        - SMS gaps identified by IndyGo.
        - Internal controls-- departmental safety audits and corrective actions
- The Director of Risk and Safety reports monthly on the internal controls and audit program to the CEO.
- The Director of Risk and Safety and the Risk and Safety Manager provide a monthly status summary to the Executive Leadership Team on issues needing immediate attention regarding SMS compliance, including unacceptable or undesirable hazards and resource allocation for corrective action.
- The Director of Risk and Safety provide a quarterly status report to the CEO and an annual summary, including the internal audit findings.

Chapter 3 – Integration with Public Safety and Emergency Management

The following sections describe Emergency Response Planning, Coordination, and Training:

3.0 Emergency Management

Indianapolis Public Transportation Corporation (IndyGo) has developed this Emergency Response Plan (ERP) to provide safe transportation service to our customers, the citizens of our service area, and the employees of our company. The IndyGo Emergency Response Plan (ERP) provides a structured guide during periods of an emergency, whether natural or manmade disasters, as well as when disasters are forecasted or imminent. IndyGo has adopted the protocols defined in the National Incident Management System and has formed an Emergency Response Team. The Emergency Response Team (ERT) will be the key to the success of our emergency response actions. The ERT team will provide the overall direction of the emergency response activities. With the decision-makers at one location, key personnel and resources can be utilized more efficiently. The coordination of emergency response activities will ensure that all tasks are accomplished with little or no duplication of effort. The ERP will help us to:

- Provide a superior level of safety in our transit operations.
- Identify the succession plan and responsibilities for IndyGo.
- Maximize our resources during an emergency or crisis.
- Continue our continuity of operations during emergencies.
- Comply with all agencies at the local, state, and federal levels to minimize the impact during emergencies and to meet applicable requirements of regulatory agencies.
- Ensure safety is the responsibility of every employee.

During many distinct types of emergencies, the role of IndyGo is to support the efforts of police, fire, and rescue workers. Transit equipment and personnel may be used for evacuations, transporting emergency workers, or for warming/cooling areas at the scene of an incident. Normal transit services may need to be modified during such emergencies, but IndyGo remains committed to providing transportation to the public to the greatest extent possible.

IndyGo's emergency planning process includes the following categories:

- Flood
- Earthquake
- High-velocity winds and tornadoes
- Derailments and collisions (mass casualties)
- Grade crossing accidents
- Hazardous Materials
- Hijacking or hostage situation
- Terrorist attacks:
- Chemical/Biological - Inside vehicle
- Chemical/Biological - Outside vehicle

- Bomb threats or explosives (including weapons of mass destruction (WMD)

3.0.1 Meetings with External Agencies

IndyGo staff attend first responder meetings throughout the year, and other emergency response meetings as required to coordinate and plan emergency response and proactive processes. Agencies represented at these meetings included local police, state police, FBI, Attorney General's office, fire departments, emergency medical service, county emergency management, and public utilities.

IndyGo also coordinates with the City of Indianapolis and the Indianapolis Fire Department, as well as with other supporting agencies, for planning, training, and exercises to ensure a comprehensive response to any adverse event on the system.

3.0.2 Emergency Preparedness Planning

IndyGo's emergency management planning and preparation are consistent with the objectives outlined in the Homeland Security Presidential Directives (HSPDs) requiring implementation of the National Response Plan (NRP), the National Incident Management System (NIMS), the National Infrastructure Protection Plan (NIPP), and the National Preparedness Goal. IndyGo's activities to support the implementation of HSPD requirements are coordinated through the Marion County Emergency Operations Center (EOC). The System Security Plan (SSP) provides additional details about IndyGo's response to terrorist events.

3.0.3 Emergency Drills

Emergency Preparedness drills are planned and conducted with police, fire, and emergency response personnel from Indianapolis. On new extensions, extra tabletop exercises and drills are held to familiarize the departments with IndyGo operations, its equipment facilities, and procedures. In addition, facility emergency preparedness drills are conducted semi-annually. Emergency preparedness drills can include evacuation and severe weather shelters. IndyGo follows the Homeland Security Exercise and Evaluation Program (HSEEP) protocol.

Drills Conducted	Frequency
Fire with Evacuation	**Q**
Severe Weather	**A**
Workplace Violence (Active Shooter)	**A**
Bomb Threat	**A**
Q= Quarterly A= Annual	

3.0.4 Implementation of Findings

After-Action Reports (AARs) are developed following the completion of emergency drills and exercise scenarios. The Executive Leadership Team reviews the After-Action Reports and develops and implements appropriate actions to respond to the After-Action Report recommendations. Discrepancies found because of corrective training or drills are corrected in the procedures developed by the appropriate department with the assistance of the Safety Department.

3.0.5 Emergency Familiarization

Fire Departments

- Procedures for notification, control, and the degree of responsibility on-site;
- Levels of service (equipment, personnel, etc.) to be delivered in response to various types of transit emergencies;
- Appropriate methods for communication and transfers of command;
- Familiarization with IndyGo equipment and facilities;
- Use of tools, equipment, and IndyGo personnel to assist as necessary;
- Procedures to remove and restore power; and
- Scheduled drills and exercises annually.
- Annual training with first responders.

Police Departments

Familiarization training is also provided to local and regional police and law enforcement organizations, including law enforcement personnel specifically assigned by contract to IndyGo. Law Enforcement Training is conducted and coordinated with IndyGo Security. Included in the training are:

- Procedures for notification, control, and the degree of responsibility on-site;
- Familiarization with IndyGo equipment and facilities; and
- Scheduled drills and exercises annually.
- Annual Police SWAT Team training and familiarization.

Emergency Preparedness Training

IndyGo incorporates emergency management training through various safety, Public Safety, and operations training programs to achieve the following objectives:

- Applicable management, operations, and maintenance rules, procedures, and plans are effectively documented and conveyed to those responsible for their implementation.
- Oversight to ensure IndyGo personnel are responsible for dispatching and controlling assets to administer, operate, and maintain the system's safety and security equipment and facilities;
- Safety-related rules and procedures for management, operations, and maintenance personnel are documented and effectively implemented by all employees as required.
- Emergency procedures have been developed, documented, and successfully implemented by all personnel as required, including public safety personnel (if appropriate);
- Transportation personnel and local emergency responders understand the hazards of the transportation environment; and
- An adequate level of preparation is maintained for a possible emergency.

Additional training typically addresses rules, policies, and procedures, as well as many of the hazards in the transportation environment (e.g., live power, track and roadway safety, hazardous materials and alternate fuels, medical emergencies, or blood-borne pathogen awareness, personal safety, and injury

prevention). NIMS and Incident Command System (ICS) orientation and training activities are ongoing. All employees participate in the IndyGo Emergency Response Plan training.

3.0.6 Emergencies Involving Criminal Activity

A more detailed discussion of the response and handling of emergencies involving criminal activities (i.e., terrorism, bomb threats, hijacking, etc.) is found in IndyGo's System Security Plan (SSP) and is considered Security Sensitive.

3.1 Emergency Operations

3.1.1 Incident Command Center

IndyGo's Incident Command Center is utilized to coordinate, manage, and provide mitigation planning for emergencies. The Command Center is equipped with display boards, computers, and/or laptops (with an internet connection), a television with satellite dish or internet connectivity, telephone lines, portable radios, and other equipment as directed by the CEO.

The Incident Command Center involves several separate areas: the main meeting area, the executive team meeting area, and a secondary meeting area. Once the ERT has been activated, all required ERT personnel shall report to the identified location.

- **1501 Building- Conference Room**- This area should be locked down during the incident to discourage unauthorized visitors. The Incident Commander will appoint someone to field all calls for the ERT. This Room will be for housing representatives of each department. Upon activation of the ERT, the designated representatives from each department shall report to the ERT Incident Command Center and activate their assigned workstations. There will be three phones, three computer stations, a TV to monitor news information, and one conference area. The Safety Officer's Station will be equipped with an IndyGo MECA handheld radio and a Police/Fire scanner.
- **1501 Building- Conference Room**- This area will serve as the ERT annex, housing representatives of the executive team and board members.
- **East Campus** –This Room will be for housing representatives of each department. Upon activation of the ERT, the designated representatives from each department shall report to the ERT Incident Command Center and activate their assigned workstations. There will be three phones, three computer stations, a TV to monitor news information, and one conference area. The Safety Officer's Station will be equipped with an IndyGo MECA handheld radio and a Police/Fire scanner.
- **East Campus Secondary Location** –This area will serve as the ERT annex, housing representatives of the executive team and board members.

3.1.2 Activation Criteria

The Command Center may be activated for any of the following reasons:

- Resources beyond IndyGo's capability are required to respond to an emergency.
- An emergency for long duration;
- Major policy decisions will be needed.
- A local or state emergency is declared, and

- Activation of the Command Center will be advantageous to the management of the emergency.

3.1.3 Activation of the Incident Command Center

The Command Center is activated anytime there is a need to handle an event, foreseen or unforeseen. For Level I and II events, the Accountable Executive may activate the Command Center at their discretion. For Level III, the Command Center is activated at the discretion of the CEO or their designee.

Immediately following the activation of the Command Center, the following people are notified of the activation and asked to report or send a representative to the Command Center:

The Emergency Response Team will include the following departments.

- President/CEO
- COO
- Chief Public Affairs Officer
- Chief Legal Officer
- Chief People Officer
- Director of Risk & Safety
- Director of Security
- Deputy Chief of Fleet, Maintenance & Facilities
- Deputy Chief of Transit Operations
- Chief Financial Officer- CFO
- Chief Information Officer
- Chief Development Officer
- Director of Facilities
- Director of Vehicle Maintenance
- Senior Director of Procurement
- Director of Service Planning
- President of ATU Local 1070

3.1.4 Functions of the Incident Command Center

For Level III events, the Command Center makes all overall strategic management decisions (with the Incident Commander leading the discussion), including taking the following actions:

- Implement event plans and document all Command Center actions;
- Request assistance from outside emergency response agencies for fire, medical, police, and evacuation emergencies;
- Dispatch supervisors to the scene or other designated locations;
- Dispatch IndyGo security to assist at the event scene.
- Communicate with the Service Center all bus movements, as required; as appropriate, activate/deactivate inductive charging power;
- Contact maintenance supervisors for assistance, as required.
- Coordinate requirements for supplemental service.

- Perform management notifications, respond to incoming telephone calls, and perform other duties as assigned; and
- Provide timely media information.

3.2 Levels of Emergency/Special Event

3.2.1 Levels of Emergency

IndyGo recognizes three levels of emergency, which are determined by the severity of the emergency. The purpose of this rating system is to provide a standard for determining the magnitude of response to the emergency.

Table D: Levels of Emergency

Element of Definition	Agency Threshold
Service Interruption	Inability to provide service
Duration of Interruption	2 hours (system-wide) 24 hours (single route)
Injuries and Fatalities	2 or more injuries requiring hospitalization 1 or more fatalities
Dollar Amount of Property Damage	> $25,000

3.2.2 Levels of Special Event

Planned special events are categorized by the expected size of the crowd drawn to the event and by the potential number of transit customers affected by the event. The purpose of the rating system is to provide a universal standard for determining the level and scope of the response to the event.

The levels of special events will be communicated within the IndyGo SOP SAF.026.19 Communication of Accidents/Incidents.

Table E: Levels of Special Event

Levels of Special Event	
Event I **Minor Event**	An event that has a minimum impact on IndyGo's transit service, with few or no response team members required on-scene. In general, IndyGo's Operations department resources are adequate to manage the event.
Event II **Major Event**	An event of a large nature that involves a certain part of the service area, including multiple days and/or large crowds. It may involve bus and/or rail but is generally local. Maintenance of the right-of-way, which adversely affects transit service and causes significant delays of over 20 minutes, would typically be suspended within this category. Response team members and crowd management services may be needed to ensure customer service.

3.3 Operations Command Center Management

The Incident Commander has direct responsibility for:

- Activation of the ERT.
- Keeping the public informed of the current situation (utilizing the public information officer).
- Implementing the policies and decisions of the Board of Directors.
- Direct the emergency operational response of IndyGo services and request outside assistance when necessary.

The Liaison Officer is responsible for:

- Maintaining control of all operations.
- Serving as staff advisor to the Safety Officer on all emergency matters.
- Activating the ERT with concurrence from the Incident Commander.
- Coordinating information from department heads to present to the CEO, Board of Directors, and Representatives of Local, State, and Federal Government agencies.
- Communicating directly with the Incident Commander.

The Operations Officer is responsible for:

- Maintaining control of all street operations. Directing communications to operators and operation staff with the use of the MECA system (bus radio, console, and handheld radios), transportation supervisors, or any other communication devices.
- Following the emergency, they will evaluate street and roadway conditions to determine what level of service IndyGo can provide. Continue to monitor the situation and prepare to adjust service as needed.

The Public Information Officer and staff are responsible for:

- Providing users and non-users of our public transit services with accurate information about the operating status of IndyGo.
- Producing printed materials necessary to communicate emergency information to users of our service.
- Printing and distributing materials regarding IndyGo service changes.
- Keeping informed about various community organizations.
- Communicating emergency information to the appropriate community leaders upon the request of the Incident Commander.

- Coordinating the evaluation of all incoming calls and directing requests to the ERT or the appropriate resource.
- Informing and updating radio, television, and newspaper reports of IndyGo's operating status.
- Developing statements addressing IndyGo's status and any plans for service or route changes.
- Maintaining contacts with the ERT to communicate any changes to previously made notices.
- Providing users and non-users of our public transit services with accurate information about the operating status of IndyGo.
- Producing printed materials necessary to communicate emergency information to users of our service.
- Communicating emergency information to the appropriate community leaders upon request.
- Develop canned messages for not providing specific bus locations but rather referring inquiries to published schedules.

The Logistics Officer and staff are responsible for:

- Securing the Downtown Transit Center facility.
- Supplying vehicles as required.
- Controlling bus movement in and out of the Downtown Transit Center.
- Supplying and staffing an emergency fueling point for vehicles operating during periods of emergency.
- All employees, upon communication, will park in the South Parking Lot and enter through the Transportation Entrance. All other entrances will be locked and restricted.
- All employees should report to their direct supervisor for instructions.
- Check and verify the operability of all IT systems by prioritizing access control systems, facility CCTV systems, CAD/AVL, Avail, MECCA, Hastus, Ellipse, and T1 lines, and disable all public bus schedules.

The Finance Officer and staff are responsible for:

- Supporting the emergency procurement needs of the EOC.
- Establishing and maintaining a complete and separate file of all emergency-related expenditures.
- Prepare for emergency expenditures and procurements.

- Support the emergency procurement needs of the organization.
- Establish and maintain a complete and separate file of all emergency-related expenditures.

The Safety Officer is responsible for:

- During emergencies or the threat of such, the Director of Risk and Safety and his staff may act as the **Incident Commander**.
- It is the responsibility of the Incident Commander to arrive at the scene of the emergency and control and coordinate the on-scene resources through instructions given by the ERT.
- The Incident Commander is responsible for coordinating with other on-scene agencies and forwarding information and requests to the ERT.
- The Incident Commander is also responsible for safeguarding all on-scene IndyGo equipment and personnel and directing their actions.

The Planning Officer and staff are responsible for:

- Maintaining an employee contact list and supporting the communication process.
- Establishing dialogue with the union leadership.
- Providing legal counsel.
- Researching any Federal, State, or Local regulations about the emergency.

2.0 Coach Operators, Maintenance employees, and staff:

- Protect the safety and well-being of our passengers, yourself, and then property.
- Follow the emergency instructions of Supervisors, Dispatchers, or the Incident Commander.

3.4 Emergency Management Training

3.4.1 Familiarization Training

Emergency exercises, including tabletops and full-field exercises, are a critical part of IndyGo's emergency preparedness training. At least once each year, IndyGo works with its first responder partners to hold a full field exercise. Exercises are documented via After Action Reports. More information can be found in IndyGo's ERP.

Periodic familiarization and refresher training have been planned and coordinated between IndyGo and the local fire and police departments. This training included disaster activities, vehicle emergency equipment, and communications. Training sessions in emergency response to IndyGo, Paratransit, and Buses are conducted annually. In addition, management conducts a review of emergency response plans annually.

Meetings/drills have been coordinated and implemented with the following agencies on various fire/life safety issues:

- Indianapolis Metropolitan Police Department
- Indianapolis Fire Department

- Indianapolis Emergency Medical Services
- Federal Transit Authority
- Lawrence Police Department
- Transportation Security Administration

3.4.2 Employee Training

All IndyGo operations and maintenance personnel undergo emergency response training to ensure they have a thorough understanding of their role and responsibilities during an emergency. At a minimum, training is provided on IndyGo's SOPs and emergency plans that the employee may be required to implement, and on any specialized equipment. In addition, management conducts an annual review of emergency response plans to ensure consistency with training drills and exercises. All IndyGo new hires also receive a safety procedures orientation guide with the evacuation routes/procedures.

Chapter 4- SMS Documentation and Records

Plan Review Modification

4.0 Safety Plan Management

The Safety Management program operates under the principle of continuous improvement. To this end, the Safety Plan must be reviewed annually and revised as needed to reflect changes in IndyGo's organization, procedures, equipment, facilities, and operating environment, including:

- Policy changes (mission, goals, or objectives).
- Organizational changes.
- Changes to rules and regulations.
- Changes in operating procedures.
- Elimination of equipment or addition of new equipment: and
- Elimination of a facility or addition/acquisition of a new facility.

Changes in safety policy, goals, or objectives require the approval of the IndyGo President and CEO.

Changes in policy, organization, rules, regulations, or operations necessitating Safety Plan adjustments are accomplished within the schedule described herein**.**

4.1 State Oversight Requirements

4.1.1 Submittal Procedure

IndyGo will assess its Safety Plan once each year and coordinate with the State and MPO in the selection of their performance targets to the maximum extent practicable (§ 673.15(b)). IndyGo must submit proposed Safety Plan changes to the MPO annually for review, including a summary identifying and explaining proposed changes.

IndyGo must also submit to the MPO any Safety Plan revisions made between annual updates. Such submissions are made before the time the revision is to be implemented. The MPO reviews the revisions.

4.1.2 Review and Approval Procedure

4.1.2.1 Approved Plans

IndyGo will self-certify its PTASP and submit a copy to the MPO for review upon completion. IndyGo will coordinate with the State and MPO to the maximum extent practicable (§ 673.15(b)). The plan the MPO reviews and approves is considered the Safety Plan in effect until another such plan is submitted and approved by the requirements of the Program Standard.

4.2 IndyGo Internal Safety Plan Review and Approval Process

The Director of Risk and Safety ensures that the Safety Plan is developed, implemented, and maintained appropriately and effectively. The Executive Leadership Team assists the Director of Risk and Safety in this effort. The Director of Risk and Safety also notifies the MPO staff in writing of any proposed changes to the Safety Plan for review. Any recommended updates or changes are due from the SSC by January 1st, so a review with the Accountable Executive can be held by February 1st, and the plan implementation by March 1st each year.

4.2.1 Safety Plan Revisions

The process for revising the Safety Plan includes a thorough review of the current Safety Plan by IndyGo's management; complete documentation of all proposed revisions to the Safety Plan by proposers; Executive Leadership Team review of proposed revisions; required approval; notification of the MPO of proposed changes; distribution and implementation. Any recommended updates and/or changes are due by February 1st, so a review with the Accountable Executive can be held and the plan implementation by March 1st each year. This will be presented to the Board of Directors for approval in February each year.

4.2.2 Implementing Safety Plan Revisions

Implementation of the Safety Plan by all IndyGo departments and firms participating in IndyGo projects assures that safety is an integral part of all planning, testing, operation, maintenance, construction, procurement, and disposal activities. System Safety continuity is assured through the evolution of the Safety Plan, periodic updates of the Safety Plan, and audits and reviews. All IndyGo Executives, Officers, Directors, Managers, and Supervisors are responsible for carrying out the Safety Plan procedures for their respective departments.

4.3 Training Records

All employee training is logged and maintained in the appropriate employee file. Ensuring this task is properly performed and entered in the employee file is the responsibility of the Operations, Training, Safety, and HR departments.

These departments are responsible for ensuring that training records are entered into the appropriate employee file. When recurring training is required, the Department notifies the employee and the employee's supervisor. Any anomalies are also noted and brought to the attention of the heads of Operations, Maintenance, Training, and HR, as well as the Director of Risk and Safety.

Contractor training records are maintained by the department providing the contractor training.

Records of safety-related training are maintained by the requirements of 49 CFR 673 and 674.

Part 2 Safety Risk Management

Safety Risk Management Process

IndyGo has developed and implemented a Safety Risk Management process for all elements of its public Transportation system. The Safety Risk Management process is comprised of the following activities:

- Identification of safety hazards,
- Analysis of safety hazards,
- Safety risk evaluation, and
- Safety risk mitigation.

Safety Risk Assessment

A safety risk assessment is a systematic procedure for identifying and managing hazards. It encompasses a thorough examination of the entire work environment, processes, and equipment to determine any hazard to the health of the employees in the short or long term and implement remedies.

Safety assessments consist of the following stages:

- Identifying a hazard
- Collecting information and analyzing the risk associated with it.
- Determining how to remove or reduce its effect by eliminating the process or equipment.
- Replacement with better equipment or process
- Using advanced technology or design and physically isolating processes or direct contact with the user, using appropriate collective or personal protective equipment

See Table F: Typical Hazard Identification Activities and Schedule

Safety Hazard Identification and Analysis

IndyGo has established a process for hazard identification and analysis. IndyGo includes, as a source for hazard identification and analysis, data and information provided by an oversight authority and the FTA. (Chapter 5)

Safety Risk Evaluation and Mitigation

IndyGo has established activities to evaluate and prioritize the safety risks associated with the potential consequences of safety hazards. Safety risks are evaluated in terms of probability and severity, and consider mitigations already in place to reduce the probability or severity of the potential consequence(s) analyzed. IndyGo has established criteria for the development of safety risk mitigations that are necessary based on the results of the agency's safety risk evaluation. (Chapter 6)

Hazard Management Process

Chapters 5 and 6 together describe the Hazard Management Process.

Chapter 5- Hazard Identification and Analysis

5.0 Hazard Management Process- Activities and Methodologies

5.0.1 Hazard Management Process

- **Hazard** -- *any real or potential condition that can cause injury, illness, or death; damage to or loss of a system, equipment, or property, or damage to the local environment.*

Hazard identification and resolution are the core elements of the Safety Plan, requiring timely correction of unsafe conditions, ideally, anticipated and reconciled before a serious accident, injury, or damage occurs. The methodology employed for the formal process of hazard identification and resolution at IndyGo is based on the U.S. Department of Defense Military Standard (MIL-STD -882E) *Standard Practice for System Safety*.

To ensure that IndyGo provides safe and reliable transportation services, IndyGo uses the hazard methodology to ensure hazards are identified and analyzed for potential impact on the operating system and resolved in a manner acceptable to IndyGo management and regulatory agencies.

All IndyGo management, staff, contractors, and suppliers are required to implement hazard management and safety and system assurance throughout the design, construction, testing, and operational phases of IndyGo's projects. Hazards that cannot be eliminated in the design phase are to be controlled by safety devices, warning devices, training, and/or written procedures to prevent hazards.

Hazard identification and resolution is a system safety process managed by the Director of Risk and Safety with the assistance of the Executive Leadership Team.

5.0.2 Hazard Identification

FTA SMS guidance defines hazard identification as:

- **Hazard Identification** -- *formal activities to analyze potential consequences of hazards during operations related to the provision of service.*

IndyGo implements this definition with a process whereby an attempt is made to discover conditions in the system that, if not altered, have the potential to cause accidents, injuries, or other losses.

Every IndyGo employee is required to report any hazard or unsafe condition to his or her Supervisor, Department Manager, or other appropriate authority as defined in this Safety Plan. Most hazards in the system are identified in the field and reported to the Service Center/Dispatch Radio Room and are entered on AVAIL reports by Dispatchers. Other hazards are logged into the Near Miss Reporting system, where notification goes to the Risk and Safety Department.

These hazards are documented and addressed immediately by the responsible departments or units through established plans, protocols, procedures, and corrective measures, and do not require entry into the hazard log as indicated in this plan. The Director of Risk Safety and/or Risk and Safety staff are notified to assist the department in addressing the hazard as needed.

If the responsible department or the Risk and Safety staff assesses the hazard to be severe enough to require changes to operating procedures, maintenance procedures, and training programs, the matter will progress to the Executive Leadership Team meetings.

Additionally, if there is a significant frequency of the hazard, such as the occurrence of accidents, the hazard may merit an assessment by the Executive Leadership Team. The Executive Leadership Team further assesses the severity and frequency of the hazard and may create formal corrective action per its CAP process to mitigate or resolve the hazard.

In addition, any employee may communicate the identification of a potential hazard directly to the Director of Risk Safety or any Risk and Safety staff member verbally or in writing, or by communicating through other communication channels.

5.0.2.1 Formal Approach

The Director of Risk and Safety, with support from the Executive Leadership Team, will determine those hazards for which formal analysis [i.e., Preliminary Hazard Analysis (PHA), Failure Modes and Effects Analysis (FMEA), or Operating Hazard Analysis (OHA)] are prepared. Further details are provided below in Hazard Evaluation and Analysis.

To address hazards resulting from system extensions or modifications, operational and other changes, safety analysis included in design and procurement contracts will provide for:

- Identification of potential/existing hazards;
- Assessment of the severity and probability of occurrence/reoccurrence of each potential hazard;
- Timely awareness of hazards for those who must resolve them;
- Ability to track and control hazards through all phases of a project's life cycle; and
- Formal Safety and Security Certification, where applicable.

5.0.2.2 Methods of Identification

Hazards at IndyGo may be identified by any or all the following methods; however, this list is intended to illustrate typical activities and is not intended to be all-inclusive.

Table F: Typical Hazard Identification Activities and Schedule

Activities	Schedule
Conduct informal observations, inspections, and analyses.	Daily
Conduct formal analysis prepared and submitted by contractors	As required by the contract
Conduct design reviews as part of the design process	As required by the contract
Field inspections and observations during project construction and testing	Daily during the project duration
Field observations and inspections of regular and special operations	Daily

Review call center logs, operations records, and event summary reports	Daily
Review maintenance activities, reports, and records.	Daily
Rules compliance activities	Daily
Review and investigate employee and passenger observations and complaints	Daily
Perform safety trend analysis.	Daily
Perform investigations of hazards, adverse events, near misses, and safety reports.	As required
Formal inspections and audits	Per the inspection and audit cycle
Review external agency reports and recommendations.	As required
Participate in and conduct peer reviews of other transit properties	As required

5.0.3 Hazard Investigation, Evaluation/Classification, and Analysis

5.0.3.1 Hazard Investigation

IndyGo Safety Reportable Hazards

Hazards that are not resolved at the operating, maintenance, or other front-line department level are appropriately reported to and investigated by the affected Operations or Maintenance Department with support from the Safety Department. Investigation findings are documented and provided to the Director of Risk and Safety, who will provide support for the department and monitor corrective actions through full resolution.

5.0.3.2 IndyGo Causal Factors (Root Cause) Review Process

Indianapolis Public Transportation Corporation (IPTC), IndyGo, has established a structured, facilitated team process to identify the root causes of an event that resulted in an undesired outcome and to develop corrective actions.

RCA looks backward in time. RCA is a reactive process taking place after harm has been done. RCA is the most favored procedure for obtaining permanent solutions to recurring problems, not just equipment failures in any project or situation.

DEFINITIONS:

Swiss cheese model- Demonstrates an organization's defenses against failure, which are modeled as a series of barriers, represented as slices of cheese. The holes in the slices represent weaknesses in individual parts of the system and continually vary in size and position across the slices.

Serious Safety Event- A serious safety event (SSE) is a variation from expected practice followed by death, severe permanent harm, moderate permanent harm, or significant temporary harm.

Near Miss Reporting- Reporting a near miss can ensure that future incidents and injuries are avoided. A near miss, also known as a close call or near hit, is defined as an unplanned event that did not result in injury, illness, or damage – but had the potential to do so.

The Sologic Root Cause Analysis Method:

Step 1: Gather and Manage Data/Evidence: All RCAs are driven by evidence.

Step 2: Create the Problem Statement: The Problem Statement documents.

Step 3: Establish a timeline from the normal situation up to the time the problem occurred.

Step 4: Analyze Cause and Effect.

Step 5: Generate Solutions.

Step 6: Produce the Final Report.

1. Selection of events to be investigated and to gather preliminary information.
   - 1.1 Events that may be investigated using the RCA process can be identified from many sources (e.g., incident reports, near-miss reporting, Risk and Safety referrals, Other Department referrals, and Employee referrals).
   - 1.2 Involve leadership in prioritization and the decision to proceed with an RCA.
   - 1.3 Start with a problem and not the solution.
   - 1.4 Don't define the problem as a need for something.
   - 1.5 If the event represents a liability concern or questionable behavior by an employee, the leadership team can initiate a performance review to start simultaneously with, but separate from, the RCA process.
2. Select the event to be investigated and gather preliminary information.
   - 2.1 Designate a facilitator for the Performance Improvement Process (PIP) team.
   - 2.2 Create a charter that will help guide the team in managing the scope of the project and making changes that are ultimately linked to the root causes identified in the RCA process.
   - 2.3 Select team Members for their ability to discuss and review what happened during the event in an objective and unbiased manner.
   - 2.4 Keep the number of management or supervisory-level individuals on the team to a minimum.
   - 2.5 Make it clear that the RCA is confidential.
3. Describe what happened.
   - 3.1 At the first meeting, a timeline of the event under review is created.
   - 3.2 The preliminary information gathered is shared with the team.

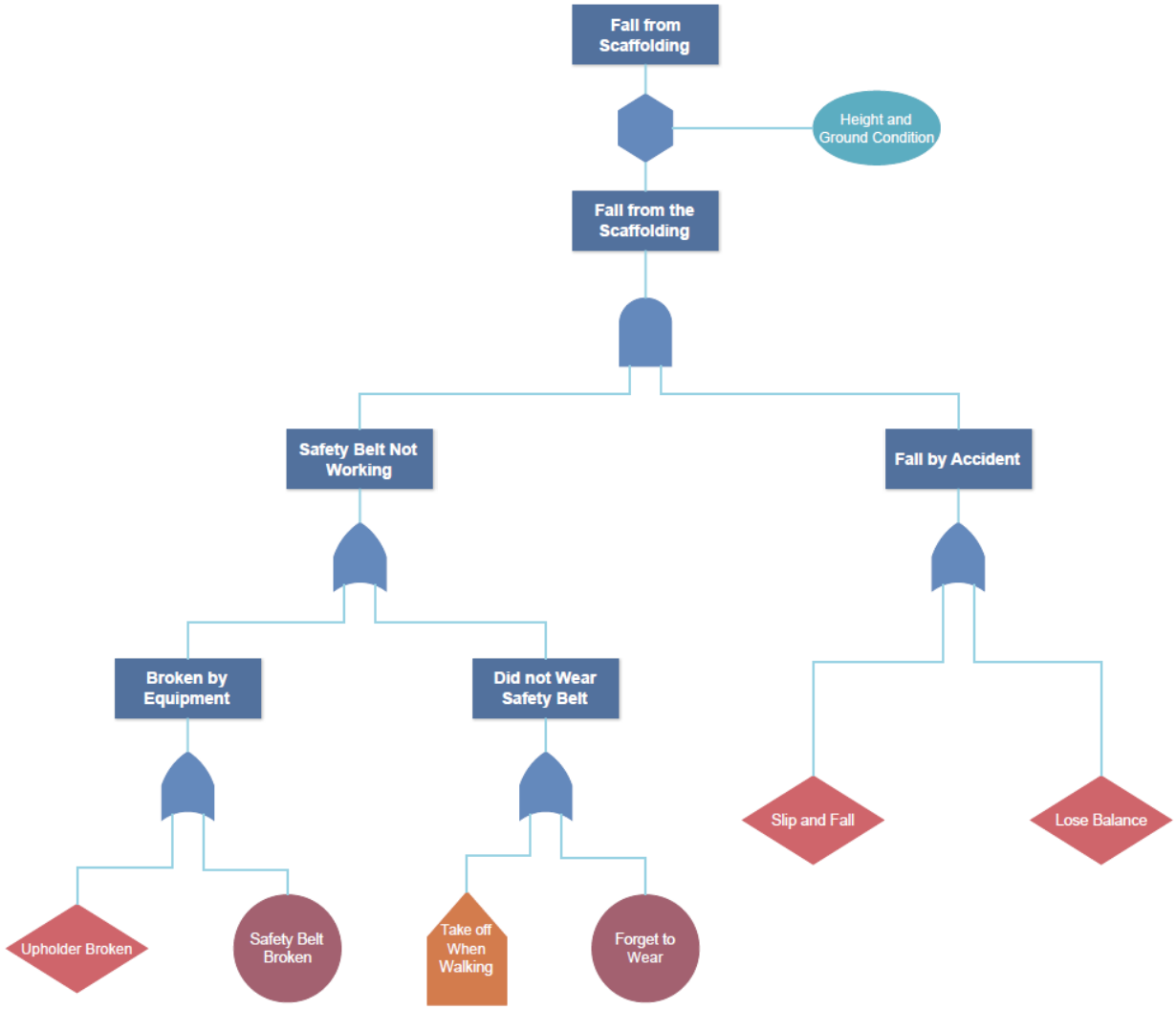
3.3 If the people not directly involved with the event are part of the team, then their comments about what happened are shared with the team.
3.4 All this information is used to create a timeline for the event.
3.5 The timeline of the event should describe just the facts, and not what caused the facts to happen.
3.6 The team can use a flipchart or sticky notes to draw a preliminary timeline.
3.6.1 Before moving ahead, the team needs to agree on the established timeline.
3.6.2 The facilitator will ask the team:
3.6.2.1 Does the timeline adequately tell the "story" of the incident?
3.6.2.2 Does each step in the timeline derive directly from the step it precedes?
3.6.2.3 Is each step in the timeline pertinent to the incident under investigation?
3.7 Resist the temptation to skip right to "identifying the root causes."
3.7.1 This may lead to the team entering the "quick fix" realm, which does not address underlying system gaps or contributing factors and will fail to prevent similar events in the future.

4. Identifying the contributing factors.
4.1 This involves the team looking at each step of the timeline and asking, "What was going on at this point that increased the likelihood the event would occur?"
4.2 Consider what is happening at each step in the timeline to ensure the team does not overlook some important factors.
4.3 Brainstorm to identify contributing factors.
4.4 Consider what procedure "workarounds" might have occurred.
4.5 When identifying contributing factors, be careful to avoid "hindsight bias."
5. Identify the Root Causes
5.1 Root causes are underlying faulty processes or system issues that lead to the harmful event. Often, there are several root causes of an event.
5.2 Contributing factors are not root causes.
5.3 The team needs to examine the contributing factors to find the root cause.
5.4 This can be done by digging deeper and asking "why."
5.5 The team can utilize the "five whys" technique.
5.5.1 The 5 Whys serve to avoid assumptions. By finding detailed responses to incremental questions, answers become clearer and more concise each time. Ideally, the last WHY will lead to a failure, one which can then be fixed.
5.6 The team must determine if they have truly identified the root cause, versus a contributing factor.
5.7 The team should not make judgments about whether an individual did the right thing. Judgment on performance will be made by the Manager.
6. Design and implement changes to eliminate root causes.

6.1 The team evaluates each root cause to determine how best to reduce or prevent it from triggering another harmful event.
6.2 The key is to choose actions that address each root cause.
6.3 At least one corrective action should be developed to reduce or eliminate each root cause.
6.4 When developing corrective actions, consider questions such as:
    6.4.1 What safeguards are needed to prevent this root cause from happening again?
    6.4.2 What contributing factors might trigger this root cause to recur? How can we prevent this from happening?
    6.4.3 How could we change the way we do things to make sure that this root cause never happens?
    6.4.4 If an event like this happened again, how could we quickly catch and correct the problem?
6.5 The team leader should encourage team members to come up with as many intermediate and strong actions as possible. It is helpful to involve supervisory and management staff in action-planning discussions.
6.6 If a particular action cannot be accomplished due to current constraints, the team should look for other ways of changing the process to prevent similar events from occurring.

7. Measure the success of changes.
7.1 What team measures should answer 3 questions:
    7.1.1 Did the recommended corrective actions get done?
    7.1.2 Are people complying with the recommended changes?
    7.1.3 Have the changes made a difference?
7.2 Evaluating the success of the PIP usually occurs after the team has been disbanded, and it will become the responsibility of the person designated to monitor the corrective action/s.

8 RCA Process Example:



Chapter 6- Safety Risk Assessment

6.0 Hazard Evaluation and Analysis

IndyGo defines hazard severity categories as a qualitative measure of the worst credible hazard resulting from a personnel error, environmental conditions, design inadequacies, and procedural deficiencies for a system, subsystem, or component failure or malfunction, as indicated in the following table:

Table G Hazard Severity Table

Severity Definitions				
Category	**Technical Definitional**	**Human Cost**	**Property Cost**	**Other Impacts**
Catastrophic	Could result in death, permanent disability, or complete system loss could result from an incident caused by a hazard.	Death and permanent disability of multiple persons	The loss will exceed $1M	Irreversible environmental damage
Critical	This could result in multiple severe injuries, disability, or major system loss that will result from incidents caused by hazards.	Hospitalization of 3 or more people; single fatality.	Loss between $500K and $1M	System interruption is greater than 24 hours.
Serious	Conditions are such that injuries to 2 or more people and/or severe damage to the system and components may occur.	Immediate medical care away from the scene for two or more persons.	Loss between $100K and $500K	System interruption is less than 24 hours.
Minor	Conditions are such that injury may result to a person – minor system damage. Minor injury or damage.	Immediate medical care (EMS) away from the scene for 1 person or no medical attention	Loss between $10K and $100K	Minor system interruption. No system interruption; “Near Miss” category

IndyGo derives qualitative hazard probability from research, analysis, and evaluation of safety data from the operating experience of IndyGo and/or other similar transit authorities. The qualitative hazard probability ranking for IndyGo is as follows:

Table H Hazard Probability Table

Table 4 – Hazard Probability Levels			
Frequency of Occurrence	**Description**	**Quantitative**	**Fleet/System**
Frequent	**Likely to occur frequently**	**1 time out of 10 or more for 12 months**	**Continuously experienced**
Probable	**Will occur several times**	**1 time out of 100 for 12 months**	**Occurs frequently**

Occasional	**It is likely to occur sometime**	**1 time out of 1000 for 12 months**	**Will occur several times in multiple locations**
Remote	**Possible to occur**	**1 time out of 100,000 for 12 months**	**Could occur once or twice**
Improbable	**Unlikely but possible to occur**	**1 time out of 1,000,000 in 12 months**	**Very unlikely but could occur once within the lifetime of a fleet or system.**
Eliminated	**So unlikely, we assume the occurrence may not be experienced.**	**Will not occur**	**This category applies to hazards that have been eliminated by design.**

IndyGo's objective of hazard identification and analysis is to assess the likelihood or probability and the severity of the potential consequences of hazardous conditions and enter them into the hazard resolution process before those conditions or associated actions cause or contribute to an accident. Although IndyGo can't identify every hazard, there are two basic time-tested methods IndyGo uses for the orderly identification of hazards: inductive and deductive.

The inductive hazard identification method consists of an analysis of system components to identify their respective failure modes and the effects they will have on the total system, while also taking current mitigations into account. This method assumes the failure of single elements or events and, through analysis, determines the potential consequential effects on the system or subsystem. Techniques commonly used for inductive hazard identification include:

- Preliminary Hazard Analysis (PHA)
- Sub-System Hazard Analysis (SSHA)
- Operating Hazard Analysis (OHA)

IndyGo uses inductive hazard identification at the onset of new capital projects to ensure that potential, but not yet realized, hazards are addressed.

The deductive hazard identification method involves defining an undesired effect or event (e.g., collision or fire) and then deducing the possible conditions or system component faults (or combinations thereof) that are necessary to cause the undesired effect or event. The technique most used for deductive hazard identification is Root Cause Analysis.

Conversely, accident analysis is an example of deductive identification of hazards that have been physically realized. IndyGo deduces from the accident and the circumstances of the accident how the mitigation of hazards could take place.

The hazard experience of other transit authorities, Paratransit, and Bus is a source of input to aid IndyGo in both the inductive and deductive processes. All hazards are gathered through the Executive Leadership Team.

6.1 Hazard Control and Eliminations

FTA defines risk as:

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

IndyGo, therefore, expresses risk as to the *possible loss over a specific period or several operational cycles, often indicated in terms of hazard severity and probability.*

Before implementation of any corrective action, IndyGo has established a hazard severity category (1 through 4) and a probability ranking (A through E), which are combined to form a numerical value called a Risk Index, reflecting both severity and probability of occurrence for each identified hazard. IndyGo assigns a Risk Index to a hazard before implementation of any corrective action. The range of possible Risk Indices is shown in the following matrix.

Table I Hazard Risk Index

Frequency of Occurrence	**Hazard Categories**			
	Catastrophic (1)	Critical (2)	Serious (3)	Minor (4)
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (F)	Eliminated			

6.1.1 IndyGo strategies to minimize exposure to infectious disease.

IndyGo, like other Transit Agencies, must address strategies to minimize exposure to infectious diseases, and Transit Agencies should consider identifying mitigations or strategies related to exposure to infectious diseases through PTASP's safety risk management process.

IndyGo will review CDC Guidelines as published and update the IndyGo Emergency Response Plan and the IndyGo Pandemic Plan. IndyGo will share all updates with employees.

6.1.2 Hazard Assessment

IndyGo applies risk assessment criteria to the identified hazards based on their estimated severity and probability of occurrence to determine acceptance of the risk or the need for corrective action to further reduce the risk. The risk assessment and acceptance criteria assist IndyGo management in

understanding the amount of risk involved by accepting the hazard relative to the costs (schedule, dollars, operations, etc.) to reduce the hazard to an acceptable level.

Hazard Risk Index		Hazard Risk Decision Characteristics
1A, 1B, 1C, 2A, 2B		Unacceptable Immediate short-term mitigation and risk control plans are required
1D, 2C, 3A, 3B		High Requires Executive Leadership Team and Director of Risk and Safety review and concurrence from the President and CEO of IndyGo.
1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B		Medium Acceptable with Review, Requires Executive Leadership Team and Director of Risk and Safety review.
4C, 4D, 4E		Low Acceptable without further review

1. **Unacceptable Risk (High) –** Requires the Executive Leadership Team and Director of Risk and Safety review and concurrence from the President and CEO of IndyGo. An immediate short-term mitigation and risk control plan is required.
2. **High Risk (Serious) –** Requires the Executive Leadership Team and Director of Risk and Safety review and concurrence from the President and CEO of IndyGo. Short-term mitigation is generally required; Risk must be reduced and tracked.
3. **Medium Risk**– Acceptable with Review. Long-term mitigation plans may be developed, where feasible, to reduce or eliminate risk. Requires the Executive Leadership Team and the Director of Risk and Safety review.
4. **Low Risk**– Acceptable without further review; no additional control or mitigation required.

IndyGo acts to eliminate identified hazards or to reduce the associated risk. By the acceptance criteria above, IndyGo eliminates “unacceptable” hazards or reduces their associated risk to an acceptable level. If this is impossible or impractical, alternatives are recommended to the appropriate IndyGo management decision-makers.

After assessing the severity and probability of a hazard, and where reasonably feasible, the key departments, the Executive Leadership Team, and the Risk and Safety Department, make a standard analysis. A determination is made regarding acceptance of the hazard risk or taking corrective action. Hazard risk assessment issues of significant operational impact or those where there is a lack of consensus are submitted to the CEO for resolution. The CEO accepts, modifies, or rejects the Executive Leadership Team's recommendations. If modified or rejected, the Executive Leadership Team is called into session for further review and recommendation. Upon final approval of the hazard risk by the CEO,

Executive Leadership Team, or Director of Risk and Safety (as identified in the table above), the resolution is placed into the hands of the responsible department(s) for implementation.

6.1.3 Safety Risk Mitigation

IndyGo can reduce safety risks by reducing the likelihood and/or the severity of the consequences of hazards. The order of precedence for satisfying system safety requirements and resolving (eliminating or controlling) hazards at IndyGo is as follows:

- **Design for Minimum Risk**. The primary safety effort during the design phase of a project will be an attempt to eliminate hazards through design selections (e.g., fail-safe, redundancy).
- **Incorporate Safety Devices**. Hazards that cannot be eliminated or controlled through design selection are controlled to an acceptable level using fixed, automatic, or other protective safety design features or devices, including PPE.
- **Provide Warning Devices**. Where it is not possible to preclude the existence or occurrence of a hazard through design selection or use of safety devices, warning devices will be installed for the timely detection of the hazard condition and the generation of an adequate warning signal.
- **Develop Special Procedures, Equipment, and Training**. Where it is not possible to eliminate or reduce the magnitude of an existing or potential hazard through design selection, or the use of safety and warning devices, special procedures, including the use of personal protective equipment, will be developed (IndyGo or its contractors, as required) to control the hazard. All applicable personnel are trained in the procedures and equipment by IndyGo Standard Operating Procedures.

6.1.4 Procurement/Contractor Requirements

IndyGo procurements of safety-critical systems, processes, or products require that responding contractors/suppliers utilize a methodology for hazard management by this list in order of precedence. Specifications include the requirement for all contractors/suppliers who provide systems, subsystems, or equipment that affect safe vehicle movement or passenger/employee safety to adhere to this Safety Plan. The contractor/supplier's Safety Plan and supporting documentation must be approved by the IndyGo department responsible for the contract in coordination with the Executive Leadership Team. The IndyGo-approved contractor program plans must, at a minimum, define objectives, tasks, procedures, schedules, and data submittal for the safety activities that will be performed by the contractor/supplier.

6.1.5 Hazard Tracking

IndyGo has established a Hazard Tracking Log, which reflects the consolidation of information in the hazard management process. The Hazard Tracking Log contains all hazards meeting the unacceptable or undesirable thresholds. The Hazard Tracking Log includes the following required information:

- **Hazard ID Number** – refers to the number assigned to the hazard by IndyGo.
- **Hazard Description** – refers to a brief narrative summary of the hazard – what it is; where it is located; what elements it comprises; the element of IndyGo's operation affected by the hazard (i.e., facilities, vehicles, track, signal, personnel training, and procedures, etc.).
- **Date Identified** – refers to the date the hazard was identified at IndyGo.

- **Hazard Source** – indicates the mechanism used to identify the hazard, i.e., operator report, near miss, accident investigation, results of internal safety or security review/audit, rules compliance or training program; maintenance failure, facility, equipment, or vehicle inspection, trend analysis, formal hazard analysis, etc.
- **Hazard Risk Index** – refers to the hazard severity and hazard frequency (or risk index) ratings initially assigned to the hazard by IndyGo.
- **Hazard Resolution**– refers to the actions recommended by IndyGo to address the hazard and bring it to a level of risk acceptable to management.
- **Status** – refers to the status of the recommendations. Status may be designed as pending, open, in progress, or closed.

Table J Sample Hazard Tracking Log

Safety Risk Register Group

Bus Operations | Transit Center | Paratransit Operations | Fleet Services | Administration | Bus Maintenance

No of Records : 2

Risk Group	Hazard	Hazard Type	Hazard Source	Identification Date	Identification Source	Analysis Date	Worst Possible Outcome	Starting Safety Index	Current Safety Index	Severity of Consequences	Likelihood of Consequences
Bus Operations	test 2	Natural Hazard	test 2	30-Mar-2023	Safety Assessment	31-Mar-2023	test	3C	3C	Occasional	Serious
Bus Operations	Test	Organizational Hazard	Test	22-Mar-2023	Accident Investigation	23-Mar-2023	Test	3E	3E	Improbable	Serious

6.1.6 Hazard Management Documentation

All departments are responsible for appropriately documenting the following information on hazards in their respective areas, including:

- How the hazard was recognized and reported
- A description of the hazard and the immediate corrective action(s) taken.
- The Initial Risk Assessment is based on the probability and severity of the hazard if nothing were done and uses the risk assessment matrix in IndyGo's Hazard Management Procedure.
- Results of the investigation, including the circumstances, events, and probable cause(s) leading up to the hazard.
- Additional corrective action that was or will be done to reduce the probability and/or severity of the hazard (including schedule and responsibility).
- The Final Risk Assessment is based on the likelihood of the hazard to occur and its likely severity when the proposed correction action/resolution is in place.

Each Department must submit this documentation at least monthly to the Director of Risk and Safety to review and monitor each department's compliance with SRM activities. The Director of Risk and Safety will ensure that any deficiencies or failures in this area are immediately documented and transmitted to the departments for corrective action.

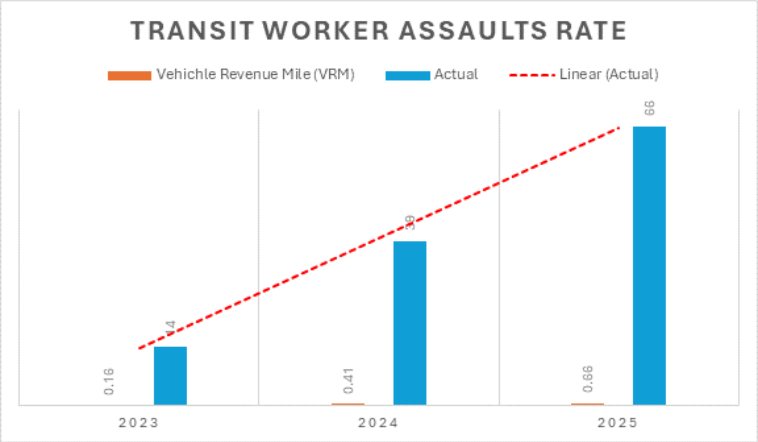
6.1.7 Mitigation of Assaults on Transit Workers

Bipartisan Infrastructure Law changes to 49 U.S.C § 5329(d) - the mitigation of assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on buses, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators when a risk analysis performed by the safety committee of the recipient established under

paragraph (5) determines that such barriers or other measures would reduce assaults on transit workers and injuries to transit workers.

IndyGo has utilized internal data of reported assaults, coach operator feedback, and mitigation strategies, and implemented a protective driver barrier to assist in protecting coach operators when in revenue service. When the protective driver barrier is utilized, it has assisted in driving down the number of assaults on transit workers.

Operator Assaults: The Federal Transit Administration (FTA) defined key elements that comprise a Safety Management System (SMS) approach to preventing and mitigating transit worker assaults. Identify and examine the root causes and risk levels of assault to properly understand the scope of the problem and potential mitigation strategies.



6.2 Corrective Action Plans

6.2.1 Corrective Action Plan Procedures

By the MPO requirements, IndyGo is required to develop corrective action plans for various deficiencies and hazards identified through the on-site safety and security review process, accident or hazard investigations, and internal safety or security reviews.

Either the MPO or IndyGo may identify the need for corrective actions. If the MPO identifies a need for corrective action, it will notify IndyGo in writing.

6.2.1.1 Causes for Initiation of Corrective Action Plans

FTA Triennial Audits of Special Investigations/Studies – Includes FTA General Directives, Safety Advisories, and bulletins covering IndyGo.

IndyGo Accident or Special Investigations – Includes accident investigations, complaint investigations, hazard trend analysis, etc.

Internal Audits

NTSB Investigations

6.2.1.2 Corrective Action Plan Required Components

The corrective action plan must be completed in the approved format submission sheet and Excel table of the MPO. Categories that are required to be included[4]:

- Date CAP Generated;
- MPO CAP Unique Identifier;
- Source;
- Description of Incident;
- Risk Assessment Code
- CAP Description;
- Anticipated Completion Date;
- Date CAP Accepted by MPO;
- Responsible Party;
- CAP Status;
- Verification Date;
- Verification Method
- Post Implementation Risk Assessment Code; and
- Quarterly Updates.

The corrective action plan is forwarded to the MPO within thirty (30) days of identification of the need for a CAP for approval by the appropriate MPO procedure. The MPO will notify IndyGo in writing of its acceptance or rejection by the appropriate procedure within an agreed-upon timeframe, or if a timeframe is not specified, within **15 calendar days** after receipt of the plan.

If the MPO rejects the corrective action plan, IndyGo has **15 calendar days** to address noted deficiencies in the plan and submit a revised plan to the MPO. The MPO, at its discretion, may arrange for a meeting with IndyGo to discuss the noted deficiencies.

6.2.1.3 Corrective Action Plan Schedule and Format

The MPO shall maintain a CAP Monitoring Log that identifies all CAPs approved by the MPO and proposed by IndyGo and their respective status. IndyGo shall submit a progress report by updating its portions of the tracking database and submitting it to the MPO every quarter. The report will include CAP activities during the period from the identification of the CAP through and including full implementation.

6.2.1.4 Immediate or Emergency CAPs

By the MPO Program Standard and 49 CFR Part 674.37(a), an exception to the MPO pre-approval may be made for immediate or emergency corrective actions. In such circumstances, IndyGo must notify the MPO in writing by 5:00 PM on the business day following its decision to take corrective action. The MPO will review the information submitted by IndyGo and communicate its approval or request further information in writing within five (5) business days of receiving the initial notification.

[4] See Chapter 9 – Corrective Action Plan Process of the MPO Program Standard

Part 3 Safety Assurance

Safety Performance Monitoring and Measurement

As described in Chapter 7, IndyGo has established activities to:

- Monitor the system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
- Monitor IndyGo operations to identify hazards not identified through the Safety Risk Management process (per 49 CFR Part 673.25);
- Monitor IndyGo operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- Investigate safety events to identify causal factors; and
- Monitor information reported through any internal safety reporting programs.

Safety Assurance Process		If yes, then….
Procedures, Monitoring, and Measurement		
	Inadequate compliance?	Address non-compliance
	Insufficient?	Evaluate hazards through SRM.
Safety Risk Mitigation, Monitoring, and Measurement		
	Ineffective?	Evaluate hazards through SRM.
	Inappropriate?	Identify new mitigations under SRM.
	Not Implemented?	Address non-compliance
Safety Event Investigations		
	Causal factors identified?	Evaluate hazards through SRM.
	Information Collected?	Use to monitor and measure through other SA processes.
Internal Reporting Programs: Monitoring and Measurement		
	Safety concerns identified?	Evaluate hazards through SRM.
	Information collected?	Use to monitor and measure through other SA processes.

Management of Change

IndyGo has established a process for identifying and assessing changes that may introduce new hazards or impact IndyGo's safety performance, which is described in Chapter 8. If IndyGo determines that a change may impact its safety performance, then IndyGo will evaluate the proposed change through its Safety Risk Management process.

Continuous Improvement

IndyGo has established a process to assess its safety performance. If IndyGo identifies any deficiencies as part of its safety performance assessment, then IndyGo will develop and carry out, under the direction of the CEO, a plan to address the identified safety deficiencies. The continuous improvement process is further described in Chapter 9.

Chapter 7- Safety Performance Monitoring and Measurement

7.0 Performance and Monitoring Activities

This chapter describes IndyGo-specific performance measures, transit asset management and state of good repair, and other performance measuring and monitoring activities, including Rules Compliance/Procedures Review.

7.1 IndyGo Specific Performance Measures

The following are some of the Safety Performance measures that have been established by IndyGo to be aligned with the SMA PTASP Risk Reduction Plan requirements:

IndyGo Risk Reduction Plan Key Performance Measures 2025

Measure	Definition	Risk Reduction Goal
Major Events	This includes all major safety and security events as defined by the NTD.	Reduce NTD Major Events. = 5% decrease from the prior year, <170
Major Event Rate	This includes all major safety and security events as defined by the NTD, divided by VRM.	NTD Major Events = 5% decrease from the prior year, <1.80
Collision Rate	This includes all collisions reported to NTD, divided by VRM.	Reduce NTD Safety Events. 5% decrease from the prior year, <0.88
Pedestrian Collision Rate	This includes all collisions "with a person," as defined by the NTD, divided by VRM.	Target is ZERO Pedestrian Collisions with an IndyGo Vehicle. 5% decrease from the prior year, <0.03.
Vehicular Collision Rate	This includes all collisions "with a motor vehicle," as defined by the NTD, divided by VRM.	Reduce Vehicular Collision Rate. 5% decrease from the prior year, <5.34
Fatalities	This includes all fatalities as defined by the NTD	Zero vehicle and employee fatalities
Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.	Zero vehicle and employee fatalities
Transit Worker Fatality Rate	This includes all transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.	Zero vehicle and employee fatalities

Injuries	This includes all injuries as defined by the NTD.	Reduce NTD Injuries to workers and passengers. = 5% decrease from the prior year, <83
Injury Rate	This includes all injuries as defined by NTD, divided by VRM.	Reduce NTD Injuries to workers and passengers. 5% decrease from the prior year, <0.88
Transit Worker Injury Rate	This includes all transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.	Reduce reported Operator Injuries from reported accidents. 5% decrease from the prior year, <1.33.
Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD.	Target is ZERO Operator assaults.
Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD, divided by VRM.	Target is ZERO Operator assaults. 5% decrease from the prior year, <0.41.
Preventable Accidents	This includes all preventable accidents for all modes, per the National Safety Council (NSC) definition of a preventable accident.	Reduce Preventable Accidents. 5% decrease from the prior year, <294
Preventable Accidents Rate	This includes all preventable accidents for all modes, per the National Safety Council (NSC) definition of a preventable accident, per VRM.	Reduce the Preventable Accidents Rate. 5% decrease from the prior year, <3.11

**VRM - Vehicle revenue miles are calculated per 100,000 miles.*

Risk and Safety 2025 Risk Reduction Plan KPIs

Risk Reduction KPI	2025 Actual	2025 per VRM	*2024*	*2024 per VRM*	Trend
Preventable Accidents	336	3.37	*309*	*3.27*	↑
Assaults on Transit Workers	66	0.66	*39*	*0.41*	↑
Transit Worker Injuries	7	0.07	*6*	*0.06*	↑
Injuries (NTD SS50)	23	0.23	*28*	*0.30*	↓
Transit Worker Fatalities	0	0.00	*1*	*0.01*	↓
Fatalities	0	0.00	*0*	*0.00*	↔

Risk Reduction KPI	2025 Actual	2025 per VRM	*2024*	*2024 per VRM*	Trend
Vehicular Collisions	61	0.61	*73*	*0.77*	↓
Pedestrian Collisions	5	0.05	*3*	*0.03*	↑
Collisions (NTD SS40)	63	0.63	*76*	*0.81*	↓
Major Events	63	0.63	*70*	*0.74*	↓

2025 Goal 5% reduction in all KPI's

IndyGo Risk Reduction Plan

Indianapolis Public Transportation Corporation (IPTC), IndyGo, established a procedure per the FTA National Public Transportation Safety Plan, and the updates from the Bipartisan Infrastructure Law to include in their Agency Safety Plan a safety risk reduction program for transit operations.

The Bipartisan Infrastructure Law requires Section 5307 recipients that serve an urbanized area with a population of 200,000 or more to include in their Agency Safety Plan a safety risk reduction program for transit operations. These safety risk reduction programs aim to improve safety performance by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to the National Transit Database, including:

- A reduction of vehicular and pedestrian accidents involving buses includes measures to reduce visibility impairments for bus operators that contribute to accidents, including retrofits to buses in revenue service and specifications for future procurements that reduce visibility impairments.
- The mitigation of assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on buses, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators, when a risk analysis performed by the recipient's Safety Committee determines that such barriers or other measures would reduce assaults on transit workers and injuries to transit workers.

The National Safety Plan (NSP) identifies fourteen (14) mandatory performance measures required for PTASP safety risk reduction programs:

- Major Events, Major Event Rate, Collision Rate, Pedestrian Collision Rate, Vehicular Collision Rate, Fatalities, Fatality Rate, Transit Worker Fatality Rate, Injuries, Injury Rate, Transit Worker Injury Rate, Assaults on Transit Workers, Rate of Assaults on Transit Workers, and System Reliability.
- IndyGo established two additional measures to review:
    - Bus Rapid Transit (BRT) System Updates/Capitol Projects
    - Security Events.
- Under the new Bipartisan Infrastructure Law requirements, the Safety Committee must establish these targets using a 3-year rolling average of the data the agency submits to the National Transit Database (NTD).

	Required Safety Risk Reduction Program Measure	Description
1	Major Events	This includes all safety and security major events as defined by the NTD.
2	Major Event Rate	This includes all safety and security major events as defined by the NTD, divided by VRM.
3	Collision Rate	This includes all collisions reported to the NTD, divided by VRM.
4	Pedestrian Collision Rate	This includes all collisions "with a person," as defined by the NTD, divided by VRM.
5	Vehicular Collision Rate	This includes all collisions "with a motor vehicle," as defined by the NTD, divided by VRM.
6	Fatalities	This includes all fatalities as defined by the NTD
7	Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.
8	Transit Worker Fatality Rate	This includes all transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.
9	Injuries	This includes all injuries as defined by the NTD.
10	Injury Rate	This includes all injuries as defined by the NTD, divided by VRM.
11	Transit Worker Injury Rate	This includes all transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.
12	Assaults on Transit Workers	This includes all assaults on transit workers as defined by the NTD.
13	Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by the NTD, divided by VRM.
14	System Reliability	This includes Major Mechanical System failures as defined by the NTD.

- *VRM= Vehicle Revenue Mile*

The Bipartisan Infrastructure Law establishes a safety set-aside requirement for all Section 5307 recipients that serve a large, urbanized area. These transit agencies must allocate not less than 0.75 percent of Section 5307 funds to eligible safety-related projects.

- As required under the Bipartisan Infrastructure Law, if an agency fails to meet a safety performance target under the safety risk reduction program, it must allocate its safety set aside in the following fiscal year to eligible projects that are reasonably likely to assist the agency in meeting the target.
- Please note that transit agencies will not be required to redirect the safety set aside if they miss risk reduction safety performance targets until FTA publishes an update to the PTASP final rule implementing this statutory requirement.

When identifying safety risk mitigations for the safety risk reduction program related to vehicular and pedestrian safety events involving transit vehicles, including addressing a missed safety performance target set by the Safety Committee for the safety risk reduction program, the transit agency and its Safety Committee consider mitigations to reduce visibility impairments for transit vehicle operators that contribute to accidents, including retrofits to vehicles in revenue service and specifications for future procurements that reduce visibility impairments. (§§ 673.11(a)(7)(i) and 673.25(d)(3)).

When identifying safety risk mitigations for the safety risk reduction program related to assaults on transit workers, including addressing a missed safety performance target set by the Safety Committee for the safety risk reduction program, the transit agency and Safety Committee consider the deployment of assault mitigation infrastructure and technology on transit vehicles and in transit facilities, including barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators. (§§ 673.11(a)(7)(ii) and 673.25(d)(4)).

The Safety Committee identifies and recommends, based on a safety risk assessment as a part of the safety risk reduction program, including mitigations relating to vehicular and pedestrian safety events involving transit vehicles or assaults on transit workers. (§§ 673.11(a)(7)(iv) and 673.25(d)(5)).

2026 Risk Reduction Plan Goals

In compliance with federal Safety Performance Target (SPT) development, the agency calculates a three-year rolling average for each required safety performance measure across all modes—Fixed Route Bus, Rapid Bus, and Paratransit/DR. This method uses the most recent three years of NTD reported data (2023–2025), averaging each mode's annual totals and rates to produce a stable baseline for trend monitoring and SPT setting.

Measure	Definition	Risk Reduction Goal
Major Events	This includes all major safety and security events as defined by the NTD.	Reduce NTD Major Events by 3% of the 3-Year Rolling Target Calculation (61) = <59
Major Event Rate	This includes all major safety and security events as defined by the NTD, divided by VRM.	Reduce NTD Major Event Rate by 3% of the 3-Year Rolling Target Calculation (0.64) = <0.62
Collision Rate	This includes all collisions reported to NTD, divided by VRM.	Reduce NTD Collision Rate by 3% of 2025 (0.63) = <0.61
Pedestrian Collision Rate	This includes all collisions "with a person," as defined by the NTD, divided by VRM.	Zero collisions
Vehicular Collision Rate	This includes all collisions "with a motor vehicle," as defined by the NTD, divided by VRM.	Reduce NTD Vehicular Collision Rate by 3% of 2025 (0.61) = <0.59
Fatalities	This includes all fatalities as defined by the NTD	Zero fatalities

Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.	Zero fatalities
Transit Worker Fatality Rate	This includes all transit worker fatalities as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.	Zero fatalities
Injuries	This includes all injuries as defined by the NTD.	Reduce NTD Injuries by <23 from 2025
Injury Rate	This includes all injuries as defined by NTD, divided by VRM.	Reduce NTD Injury Rate by <0.23 from 2025
Transit Worker Injury Rate	This includes all transit worker injuries as defined by the NTD, including the categories "Transit Employee/Contractor," "Transit Vehicle Operator," and "Other Transit Staff," divided by VRM.	Reduce NTD Transit Worker Injury Rate by <0.07 from 2025
Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD.	Zero assaults
Rate of Assaults on Transit Workers	This includes all assaults on transit workers as defined by NTD, divided by VRM.	Reduce NTD Transit Worker Assault Rate by 5% of the 3-Year Rolling Target Calculation (0.41) = <0.39
Preventable Accidents	This includes all preventable accidents for all modes, per the National Safety Council (NSC) definition of a preventable accident.	Reduce Preventable Accidents by 5% <319 from 2025
Preventable Accidents Rate	This includes all preventable accidents for all modes, per the National Safety Council (NSC) definition of a preventable accident, per VRM.	Reduce Preventable Accident Rate by 5% <3.17 from 2025

Safety Performance Target Coordination:

IndyGo will transmit to the MPO the Safety Performance as outlined below.

Targets Transmitted to the State Authority and Planning Organization	State Authority and Planning Organization	Date Targets Transmitted By
	Indiana Department of Transportation (INDOT)	March 1st
	Indianapolis Metropolitan Planning Organization	March 1st

By March 1st of each year, IndyGo coordinates with INDOT and the MPO to the maximum extent practicable, with INDOT and the MPO in the selection of IndyGo safety performance targets.

7.2 Transit Asset Management/State of Good Repair

IndyGo also addresses the requirements of 49 CFR Parts 625 and 630, Transit Asset Management (TAM), and State of Good Repair (SGR), through the IndyGo *Transit Asset Management Plan*, which includes TAM and SGR performance measures.

7.3 Operating and Maintenance Rules and Procedures

Operational rules and procedures are contained in the Standard Operating Procedures (SOPs), Rule Book, and Operations Manuals. Facilities rules and procedures are contained in the Facilities Maintenance Plan and manufacturers' manuals. These publications cover all rules and procedures that are necessary to operate a safe and efficient bus and paratransit. The IndyGo Employee Manual, Drug & Alcohol Policy, and rule books cover most of the safety rules for IndyGo.

All rules compliance findings of non-compliance are evaluated by the Director of Risk and Safety, and where appropriate, are managed through IndyGo's hazard management process in compliance with Part II (Safety Risk Management) of this Safety Plan.

7.4 Rules Compliance

7.4.1 Operations Personnel

Daily inspections of operators are required before pull-out. Road Supervisors enforce rules and procedures in the field by observing, correcting, and documenting safety-related behaviors and activities of operators and system elements. Daily and weekly operational checks are made in the field that include, but are not limited to:

- Speed checks;
- Observation checks for time and load;
- General observations of vehicles, signals, and systems for deficiencies;
- Railroad safety compliance checks;
- Follow up on customer complaints; and
- Performance of ride checks to ensure operator rules compliance during revenue operation.

Periodic spot checks are made because of an accident, request, and/or at random. The Risk and Safety Department may conduct random checks that include, but are not limited to:

- General vehicle operation;
- Attention to duty;
- Signal compliance; and
- Door operation.

7.4.2 Maintenance Personnel

Vehicle Maintenance Supervisors enforce rules and procedures by observing and monitoring employee performance in fixed route buses and paratransit. Rules and procedures monitored and observed for compliance include, but are not limited to:

- General safety;
- Proper use of tools, equipment, and machinery;
- Proper use of personal protective equipment.
- Right-of-way safety;
- Fire safety;
- Material handling and storage: and
- Quality Assurance inspections and audits of procedures, including rule compliance.

Preventive maintenance activities are continuously monitored by maintenance managers and supervisors. Inspection tasks are periodically updated to reflect fleet needs and enhance operational efficiency and safety.

Maintenance Supervisors also conduct follow-up activities after audits to ensure employee compliance with maintenance rules.

7.4.3 Supervisory Personnel

7.4.3.1 Operations Supervisors

It is the responsibility of the Deputy Chief Transportation Officer to periodically monitor supervisor procedures and rules compliance, inspection practices, and documentation to verify whether operations supervisory personnel are appropriately and accurately enforcing compliance with the requirements and maintaining proper documentation. IndyGo requires annual evaluations of every supervisor, and the status of these evaluations is kept on file at their respective facilities.

7.4.3.2 Maintenance Supervisors

It is the responsibility of the Senior Director of Facilities and Maintenance to periodically monitor maintenance supervisory personnel rules and procedures compliance, and documentation to verify whether all maintenance supervisory personnel are enforcing compliance with requirements and maintaining proper documentation. A quality assurance program has been set up as a monitoring tool to ensure that the maintenance supervisor is complying with the rules and regulations of the company. Maintenance supervisors who have access to operating vehicles are also required to receive evaluations under IndyGo's policies. Findings from these actions are incorporated into the hazard analysis that is compiled monthly at the Executive Leadership Team meeting.

7.4.3.3 Maintenance Quality Assurance Program

- **Readiness and Cleanliness Quality Audits** -- will be performed by the in-charge person on a minimum of 20% of revenue service vehicles each day. Vehicles that have been processed by the service crew and are designated as ready for revenue service will be identified for audit by the In-Charge person.
- If the auditor finds a vehicle unacceptable due to a lack of cleanliness or emergency equipment deficiencies, the In-Charge will provide the information to the supervisor, and corrective action will be taken immediately. All completed audit forms will be sent to the Deputy COO daily for review.
- **PMI (Preventive Maintenance Inspections) Quality Audits** -- will be performed by the In-Charge person. Whenever possible, these audits should be performed while the PMI procedure is in progress. A PMI Quality Audit will be performed on at least 20% (3 audits per month) of the total PMIs performed at a location per month. Any defects and/or deficiencies will be noted on the PMI Quality Audit Form and scheduled for repair. If any safety defects are identified, the vehicle(s) will be immediately removed from service until repaired.

7.5 Facilities and Equipment Inspections

Formal facility inspections of all IndyGo facilities and grounds are conducted by IndyGo Maintenance/Safety/Facilities quarterly using a facility checklist. The purpose of the inspections is to identify any unsafe or unhealthy conditions that may exist and that may require maintenance or modification. Each facility is also visually inspected for compliance with OSHA and local fire codes.

Any guests to IndyGo's administration facility must check in through a secure process requiring check-in and validation of visit purpose. Employees are trained in procedures for visitors in the workplace, and facility access is limited through security systems.

Frequency

The Safety and Security Committee conducts its safety inspections monthly. Mechanics and Facilities Maintenance employees look for potential hazards with equipment whenever they are using that equipment. The vehicle hoists, chain pulls, and cranes in the vehicle maintenance shop are inspected annually by contractors. Preventive maintenance of equipment and facilities is performed according to the manufacturer's recommended practice. Hazards are also identified by analyzing work accident trends through Hazard Report Forms submitted by employees. Forms are used by employees to report safety concerns and to make safety recommendations.

When deficiencies are noted during monthly inspections, they are documented and reported to the director of the department in which the safety hazard is located. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor or the Director of Risk and Safety. Hazard Report Forms are routed to the department, the Director of Risk and Safety, or the director best equipped to evaluate the concern and, when necessary, propose a resolution.

The primary purpose of facility inspections and hazard reporting is to identify conditions that could lead to accidents and losses. Given this, all departments and employees must be involved in the Facility

Inspection and the Hazard Identification and Resolution processes. Hazard resolution is related to the severity of the hazard and the probability and severity of a negative consequence of the hazard.

Corrective action for a confirmed hazard that has been identified by any established process is the responsibility of the director of the department area in which the hazard exists or the Director of Risk and Safety. This includes arranging for the services of other IndyGo departments or outside parties, as necessary, to eliminate or control the hazard.

Hazards that have been identified, proposed resolutions, and corrective actions are recorded in hard copy by the Safety and Security Committee and maintained by the Director of Risk and Safety.

All front-line personnel are responsible for monitoring safety and security as part of their respective positions. If a hazard is identified through observation or interaction with customers or the public, it is reported to the immediate supervisor as well as following IndyGo's hazard reporting process.

7.5.1 IndyGo Inspections

The Risk and Safety Department inspects the IndyGo operating and maintenance facilities on an annual basis to ensure the safety of employees and guests and to ensure compliance with applicable safety regulations.

The Risk and Safety Department participates with the Maintenance Department to identify and document compliance with local, state, and federal regulations regarding environmental pollution issues related to air, water, and soil contamination, and aids in controlling hazards. A safety inspection of each facility is completed annually and includes a review of the following:

- Reporting findings and recommendations resulting from safety tests and inspections to the appropriate;
- IndyGo management;
- Performing follow-up inspections to determine compliance with findings and recommendations;
- Evaluating the effectiveness of safety tests and inspections;
- Portable fire extinguishers;
- Fire detection and alarm systems;
- Fire suppression systems;
- Building construction and maintenance;
- Building facilities: i.e., heating, ventilation, air conditioning, electrical, etc.;
- Means of egress and security (access controls);
- General housekeeping and storage practices; and
- Occupants' awareness of emergency procedures.

All inspections are documented. Inspection reports include the following:

- Date of inspection;
- Name of the facility;
- Listing of items observed;
- Description of observed deficiencies;

- Lists of applicable codes and regulations;
- Suggestions to improve the safety of the facilities; and
- Name of the inspector.

The inspection team ensures that personal protective equipment (PPE) is always available, eyewashes and fire extinguishers are operational, and general facility defects are noted and corrected. Any serious deficiencies, i.e., life-threatening, are corrected immediately. If a serious deficiency cannot be corrected immediately, it is given priority for corrective action, and preventive measures are taken to mitigate the hazard by the procedures outlined in this Safety Plan. If a corrective action for a serious deficiency is delayed, the Director of Risk and Safety or the Executive Safety & Security Committee may impose temporary measures to protect life and property. Examples of such measures include shutdowns, evacuations, notifications, or signage advising present conditions. Inspections are conducted to ensure compliance with local, state, and federal environmental regulations. Where inspections bring to light deficiencies in systems or equipment, employees follow the hazard management procedures outlined in the Safety Plan. Conformance with these procedures provides timely resolution of possible hazards along with proper reporting of deficiencies within components of the system.

An inspection report that identifies safety and health defects found during the inspection is issued to the Maintenance Department. This Department is responsible for correcting any hazards related to facilities and the equipment therein and provides a schedule listing when the corrections will be completed.

A follow-up inspection and reports are made approximately 45 days after the initial inspection. Facility inspections and audits are tracked by the Maintenance Department. The procedures for the annual safety inspection, including the “Facility Inspection Checklist,” are outlined in this Safety Plan.

7.5.2 Fire Detection & Suppression Equipment Inspections

The Risk and Safety Department and the Security Department are responsible for the inspection and maintenance of fire protection equipment at IndyGo and other IndyGo facilities. Generally, IndyGo adheres to NFPA 25 and uses the following guidelines:

- Portable fire extinguishers are inspected monthly by IndyGo and serviced annually by a contractor.
- Sprinkler systems (drains and water flow alarms) are tested monthly by zone rotation so that all systems are checked at least quarterly.
- Fire pump tests are done annually by a qualified contractor.
- Deluge and dry pipe sprinkler systems are trip-tested annually by a qualified contractor;
- Fire hydrants are flow-tested annually at facilities and stations.
- Hydrostatic tests are done every five years on dry pipe systems. A system that has been modified or repaired is hydrostatically tested before it is returned to service; and
- Reduced-pressure backflow prevention devices that serve as a fire protection system are tested and tagged by a certified plumber annually.

Risk, Safety, and Security maintains copies of the fire equipment inspection reports, and copies are provided to the Facilities Department and local fire authorities as requested.

7.6 Maintenance Cycles

The IndyGo Maintenance Department inspects, and services buses used in revenue service each day. The buses are fueled and washed, all fluids are checked, tires and lugs are checked, and the vehicle is inspected for any leaks or unusual noises. The Cleaners clean the bus interiors each day. When a defect is noted, it is reported to the Lead Mechanic or Supervisor on shift so that evaluation and, if necessary, a repair can be conducted.

Mileage-Based Maintenance Inspections**.** All buses receive preventive maintenance inspections (PMI) at designated mileage intervals. Mileages are determined by vehicle and subcomponent manufacturers and real-world experience. Oil sampling is performed periodically for both engines and transmissions. A description of the schedule and type of inspection and service performed for each bus series is included in the IndyGo Maintenance Plan.

Maintenance Inspections of Contracted Providers**.** IndyGo contracts for the operation and maintenance of paratransit services. The contractor must ensure that all passenger vehicles and associated equipment are maintained in proper working conditions. The contractor is required to implement a maintenance and safety program that includes a preventive maintenance schedule that complies with FTA requirements for preventive maintenance for vehicles. Further, contractors are required to maintain comprehensive maintenance records on each vehicle and send the information.

7.7 Safety Data Acquisition

When deficiencies are noted during monthly inspections, they are documented and reported to the director of the department in which the safety hazard is located. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor or the Director of Risk and Safety. Hazard Report Forms are routed to the department, the Director of Risk and Safety, or the director best equipped to evaluate the concern and, when necessary, propose a resolution.

7.7.1 Safety Data Acquisition and Analysis

IndyGo understands that implementing and maintaining a robust SMS requires acquiring safety-related data from various sources and analyzing and distributing that data to adequately control hazards, ensure continuous improvement, inform IndyGo management and staff of safety-related system status, ensure the appropriation of sufficient resources to address system hazards, and identify appropriate mitigations for newly emerging or latent hazards as well as meet external reporting requirements. Trend analysis is performed on safety data as a means of identifying hazards, effective or ineffective mitigations, and contributing factors of adverse events.

7.7.2 Data Acquisition

Safety data is collected, documented, and analyzed from numerous sources by all departments. Sources include but are not limited to:

- Accident Reports
- External Agency Reports and Publications
- City Official Concerns
- Claims Reports
- Daily Operations Reports

- Maintenance Reports
- Employee Concerns
- Employee Occupational Injury Reports
- FTA Bulletins and Safety Advisories
- Homeland Security Alerts
- Hot Spot Maps
- Insurance Inspection Reports
- Internal Audit Reports
- MPO/FTA Reviews
- Passenger Concerns/Customer Complaints
- Inspections, Assessments, and Observations
- Safety Meetings
- Special Occurrence Reports
- Public Safety Reports, concerns, and investigations
- Social Media Posts

Safety data collection also involves obtaining technical information, data, and reports for use in the systems development of program elements. Sources for such data include, but are not limited to:

- American National Standards Institute (ANSI)
- American Public Transportation Association (APTA)
- American Society for Testing and Materials (ASTM)
- Department of Homeland Security (DHS)
- Environmental Protection Agency (EPA)
- Federal Transit Administration (FTA)
- State Safety Oversight Program (SSO)
- Safety Data Sheets (SDS)
- National Fire Protection Association (NFPA)
- National Transportation Institute (NTI)
- Occupational Safety and Health Administration (OSHA)
- Transportation Security Administration (TSA)

Other data and information sources include building codes, professional society guidelines, and information technology and cybersecurity standards organizations.

7.8 Data Analysis and Access

Used as part of the hazard management process, data collection and analysis are used to identify hazards before they cause accidents by such techniques as trend analysis.

IndyGo's departments under the direction of Key SMS Personnel are to collect and track their safety-related data to identify causal factors and undesirable trends, including those related to hazards. The investigation may include interviews, testing, and analysis of related documentation. Identified hazards are tracked, and findings requiring corrective action are submitted to the Risk and Safety Department and the other IndyGo department(s) for review, assessment, concurrence, and discussion of further appropriate mitigations. The Risk and Safety Department reviews all safety data analysis, verifies

compliance with SMS and this Safety Plan, and provides expert advice to IndyGo Management on trends through the Executive Leadership Team.

7.9.1 Data Access

To ensure that all departments can properly fulfill their respective responsibilities for collecting, analyzing, and distributing hazard-related data, IndyGo departments collect, analyze, and report on requisite data as indicated in Table K.

Table K Data Access Table

Minimum Required Data	Provider
Traffic and passenger accident/event reports	Risk and Safety
Accident records, employee injury forms, and related accident data	Risk and Safety/Worker's Comp
Operator training programs and records	Training
Maintenance training programs and records	Training
Accident/event investigation reports, complaints, and hazards	Risk and Safety
Medical Services information	Clinic
Safety records of individual division employees related to accidents and rule violations	Operations/Risk and Safety
Records of inspections, maintenance work, accident-related activities, and emergency responses	Maintenance
Modifications to equipment and facilities	Facilities
System-wide policies and procedures, operating orders, and general notices	All Departments & Functions
Complete and current personnel files	Human Resources
Contractor's safety-related programs and procedures	Capital Assets and Facility Management
List of hazardous materials and equipment	Risk and Safety/Maintenance/ Operations
Employee Concerns	All Departments & Functions

7.9 Internal Safety Audit Process

All departments are required to assess their compliance with SMS through the authority and oversight of the Key SMS Personnel in each department. The Internal Audit Department (IAD) will provide both support to the programs in the development of compliance documentation and assessment checklists, and direct oversight of the program using its safety audit program under the direction of the CEO.

The internal audit program will encompass all SMS requirements as laid out in this Safety Plan, and in the departmental documentation detailing how the SMS program is implemented within each department/functional area.

7.10 Safety Audit Objectives

The Internal Safety Audit Process is a proactive approach to verify that IndyGo SMS is robust, has been properly implemented, all foreseeable hazards have been identified and properly mitigated, and continuous improvement has been achieved. Additionally, compliance with this Safety Plan is assessed through the audit process. Specifically, the Internal Safety and Security Audit Process is implemented to:

- To assess the effectiveness of safety and security programs;
- To identify process deficiencies;
- To identify hazards in the operational system and verify that current mitigations are effective;
- To identify weaknesses in system safety and system security programs;
- To verify that corrective actions are being closed efficiently and to evaluate their effectiveness;
- To recommend system safety and system security improvements;
- To provide management with an assessment of the system safety and system security program; and
- To ensure continuing evaluation of safety and security-related programs, issues, awareness, and reporting.

7.10.1 Safety Audit Process

The FTA requires IndyGo to develop and document a process for the performance of ongoing internal safety and security audits to assess the implementation of IndyGo's Safety Plan, Security Plan, and Emergency Preparedness Plan. A documented procedure is in place to ensure the program is performed to meet all internal and external requirements.

The internal safety and security audit process must, at a minimum:

- Describe a process used by IndyGo to determine if all identified elements of its Safety Plan and security & emergency response plans (ERP & SSP) are performing as intended;
- Determine if areas of Safety Plan, ERP, or SSP non-compliance and hazards are being identified promptly;
- Ensure that all elements of the Safety Plan, ERP, and SSP are reviewed in an ongoing manner and over a three-year cycle; and
- Ensure the unit in charge of a review is not the unit that oversees implementing the element being reviewed.

The internal safety and security audit program is a two-step process at IndyGo:

1. Each department/functional area, including Risk and Safety, is required to perform internal controls via an **annual** assessment of its compliance with the Safety Plan, its implementation of SMS within its department for Performing Internal Safety and Security Audits, and Safety Management Systems (SMS) Internal Controls.

2. The Director of Risk and Safety ensure the performance of a full assessment of each department/functional area over three years using the IAD to verify the effectiveness of the

departmental internal controls as well as assessing each area's SMS implementation and compliance.

The schedule for the audit program is found in this Safety Plan, which is provided to the MPO. The MPO will notify IAD of its intention to participate in audits if it chooses.

IAD will develop checklists and review documentation for internal control audits and provide the checklists to the MPO 30 days before each audit. IAD is responsible for reviewing the checklists, verifying their accuracy, thoroughness, and scope, and notifying the department of the results of the review.

7.10.2 Audit Reporting

All audits are fully documented and reported. Upon completion of each internal audit, the affected department must include a properly prepared corrective action plan within 30 days of each finding for MPO review and approval.

In cooperation with IAD, the Director of Risk and Safety issues a monthly report of the status of system-wide findings and corrective actions required for compliance and distributes the report to the CEO, the Executive Leadership Team, and all affected department heads.

Each department head/manager is responsible for carrying out the approved recommendations and action plans resulting from an internal safety or security audit, as determined by the Director of Risk and Safety. Any manager who foresees or encounters a problem concerning compliance with implementation within the established time frame informs the Director of Risk and Safety, who then manages the process to address and resolve all implementation issues.

Open corrective actions will be tracked in the meeting minutes from the Executive Leadership Team.

7.10.3 Annual Audit Report

By March 1 of each year, the IAD prepares for the MPO an annual report documenting all internal audit activities from the preceding calendar year and the status of findings and corrective actions associated with audits conducted.

In addition, this report will become part of an annual report documenting the status of SMS compliance of IndyGo with its Safety Plan, Security Emergency Response Plan, and overall SMS program submitted under the signature of the CEO to the MPO, the Board, and FTA.

7.10.4 Corrective Actions

By this Safety Plan, all Corrective Actions will be appropriately reported to the MPO per IndyGo's procedures.

7.11 Compliance with Local, State, and Federal Requirements

All IndyGo employees are required to comply with all applicable federal, state, and local statutory requirements. This includes licensing, motor vehicle and street operations statutes, and labor law. This section describes in more detail some of the specific requirements that directly affect hazard management at IndyGo.

7.12 Employee Occupational Safety and Health

Departments are responsible for developing, documenting, and monitoring compliance with all industrial safety and health requirements applicable at IndyGo. The Department of Risk and Safety provides support to the departments through the provision of occupational safety and health training directly to employees and provides expertise to assist departments in achieving compliance. Areas of compliance include, but are not limited to:

- Hearing conservation and personal protective equipment requirements.
- Methods for identifying and evaluating workplace hazards (Job Hazard Analysis);
- Procedures for investigating occupational injuries and illnesses and correcting unsafe or unhealthy conditions promptly;
- Communication methods such as safety meetings, posted notices, suggesting programs, and labor/ management safety and health committees;
- Safety recognition programs; and
- Documentation of compliance with program training and inspection requirements.

7.13 Contractor Safety

As part of its Safety and Security Certification Program, IndyGo includes requirements for contractors and vendors to provide documentation of plans and programs compliant with IndyGo's Safety Plan & SMS program to prevent accidents, protect employees and the public, and avoid damage to public and private properties during construction. Contractor plans must, at a minimum, address their accident prevention program, education/incentive program, substance abuse program, and safety implementation program, as well as accident investigation, reporting, and record-keeping for the contractors.

For most projects, the Construction Manager (CM) has primary responsibility for enforcing the contractor safety management program for major capital projects. The function of the CM is to establish awareness that project safety is of utmost importance. The contractor is responsible for the prevention of accidents and damage to adjacent public and private properties, as well as the education and training of its employees, the implementation of its safety program, and the substance abuse prevention program. IndyGo provides inspections, assessments, oversight, safety, and security verification activities.

All affected departments, including Risk and Safety, will work with the Director of Procurement to ensure that, as appropriate, contractors and suppliers meet IndyGo's safety requirements in the contracts, terms, and conditions before commencing work. This includes review and approval of contractor safety plans and programs, monitoring the safety performance of the contractor's/supplier's staff (e.g., wearing appropriate safety equipment, adhering to facility speed limits), and informing the Project Manager whenever deviations from established procedures occur or are needed. The Project Manager will coordinate the contractor's/supplier's safety activity with the support of the Director of Risk and Safety and the Procurement Department. An IndyGo safety representative participates in all new construction/modification committees formed and conducts joint inspections and safety meetings with contractors as available.

7.14 Drug and Alcohol Program

IndyGo is dedicated to providing safe, dependable, and economical transportation services to its patrons. IndyGo employees are a valuable resource, and it is our corporation's goal to provide a safe, healthy, and satisfying working environment, free of the potential dangers posed by an employee's use of prohibited drugs or misuse of alcohol.

This policy complies with 49 CFR Part 655, as amended, and 49 CFR Part 40, as amended. Copies of Parts 655 and 40 are available in the drug and alcohol program manager's office and can be found on the internet at the Federal Transit Administration (FTA) Drug and Alcohol Program website http://transit-safety.fta.dot.gov/DrugAndAlcohol/.

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

Portions of this policy are not FTA-mandated but reflect Indianapolis Public Transportation Corporation's policy. These additional provisions are identified by **bold text**.

All safety-sensitive employees are required to submit to drug and alcohol tests as a condition of employment in accordance with 49 CRF Part 655.

In addition, DOT has published 49 CFR Part 32, implementing the Drug-Free Workplace Act of 1988, which requires the establishment of drug-free workplace policies and the reporting of certain drug-related offenses to the FTA.

The full policy is available on request.

All Indianapolis Public Transportation Corporation employees are subject to the provisions of the Drug-Free Workplace Act of 1988.

The unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the covered workplace. An employee who is convicted of any criminal drug statute for a violation occurring in the workplace shall notify the Designated Employer Representative (DER) no later than five days after such conviction.

Covered Employees

This policy applies to every person, including an applicant or transferee, who performs or will perform a "safety-sensitive function" as defined in Part 655, section 655.4.

You are a covered employee if you perform any of the following:

- Operating a revenue service vehicle, in or out of revenue service
- Operating a non-revenue vehicle requiring a commercial driver's license
- Controlling the movement or dispatch of a revenue service vehicle
- Maintaining (including repairs, overhaul, and rebuilding) of a revenue service vehicle or equipment used in revenue service
- Carrying a firearm for security purposes

Prohibited Behavior

Use of illegal drugs is prohibited at all times. Prohibited drugs include:

- Marijuana
- Cocaine
- Phencyclidine (PCP)
- Opioids
- Amphetamines

All covered employees are prohibited from performing or continuing to perform safety-sensitive functions while having an alcohol concentration of 0.04 or greater.

All covered employees are prohibited from consuming alcohol while performing safety-sensitive job functions or while on-call to perform safety-sensitive job functions. If an on-call employee has consumed alcohol, they must acknowledge the use of alcohol at the time that they are called to report for duty. If the on-call employee claims the ability to perform his or her safety-sensitive function, he or she must take an alcohol test with a result of less than 0.02 prior to performance.

All are prohibited from consuming alcohol within four (4) hours prior to the performance of safety-sensitive job functions stated in part 655.33 (a)

All covered employees required to take a post-accident test are prohibited from consuming alcohol for eight (8) hours following involvement in an accident or until he or she submits to the post-accident drug and alcohol test, whichever occurs first.

Consequences of Violations

Following a positive drug or alcohol (BAC at or above 0.04) test result or test refusal, the employee will be immediately removed from safety-sensitive duty and referred to a Substance Abuse Professional (SAP).

Following a BAC of 0.02 or greater, but less than 0.04, the employee will be immediately removed from safety-sensitive duties until the start of their next regularly scheduled duty period (but for not less than eight hours) unless a retest results in the employee's alcohol concentration being less than 0.02.

Zero Tolerance

Per Indianapolis Public Transportation Corporation policy, any covered employee who tests positive for drugs or alcohol (BAC at or above 0.04) or refuses to test will be referred to a Substance Abuse Professional (SAP) **and terminated from employment**.

7.15 Accident and Incident Notification, Investigation, and Reporting

Response levels are divided into three separate levels for an appropriate response. Depending on the situation, incidents can change, and staff should be prepared to ramp up or down when information becomes available. The Transportation Supervisors are required to categorize the incident and then report it to the dispatcher. All responses require, at a minimum, a Transportation Supervisor response. All incidents must be categorized, and the dispatcher must record the disposition of each. Each level calls for a set of notifications, which includes the IndyGo paging system.

Purpose

To establish a standardized process for timely and accurate communication of accidents and incidents involving IndyGo transit buses, in compliance with FTA regulations and best practices for public transportation safety.

Scope

This SOP applies to all IndyGo personnel involved in Operations, Risk and Safety, Public Affairs, Security, and Emergency Response.

Definitions

Accidents: Any unplanned event involving a motor vehicle (including a public transportation bus) that results in property damage, injury, or death, and occurs on a public roadway or in a location accessible to the public.

- Collision with another vehicle, pedestrian, cyclist, or fixed object
- Passenger accidents (e.g., falling inside the bus due to sudden stops)
- Loss of control or mechanical failure leading to injury or damage
- Environmental factors (e.g., weather-related crashes)

Occurrence: An event with no injuries, no service disruption, or safety concerns.

HSAS: Homeland Security Advisory System

Severity Levels and Notification Protocols

Level 1 – Minor

Examples:

- Minor traffic collision (e.g., mirror scrape, contact with a fixed object).
- Verbal altercations without escalation.
- Employee Injury -no transport from the scene. (e.g., fall, equipment failure, on any IndyGo property).
- Power outages are not affecting service.
- Fire alarm with no smoke/flames.
    - If the fire alarm goes off, IFD will be contacted, and they will respond. Move this to a Level 2 accident page.
- Passengers fell with no injury.

Action:

- The dispatcher sends out the accident report and notifies a supervisor of the information. The supervisor will also do an accident report.
- Supervisor logs the event and notifies Risk & Safety via internal email.
- No external notification required unless escalated to the next level.

Level 2 – Moderate

Examples:

- A collision requires towing of any vehicle.
- Passenger or employee transported for medical care by an ambulance.
- Any pedestrian or bicycle accident/incident involving vehicles driven by IndyGo employees
- Non-physical assault on a transit worker, with or without police involvement.
- Any situation resulting in the arrest of an employee or passenger by law enforcement.
- Brandishing a weapon involving a transit worker, passenger, or contractor, even if law enforcement is not involved.
- Employee Injury – with transport from the scene. (e.g., fall, equipment failure, on any IndyGo property).
- A passenger was brought back into the garage as a breach of security event.
- Fire alarm with smoke/flames and fire department response.

Action:

- Dispatchers would take the call, send appropriate assistance, and send out an accident report.
- The supervisor would go to the location to perform an initial investigation and fill out an accident report.
- At this level, drug and alcohol testing of the Operator is completed per the FTA Authority and IPTC's Drug and Alcohol Policy unless the driver can be completely discounted as a contributing factor.
- Incident logged

Level 3 – Severe

Examples:

- Fatality, serious bodily injury, or life-threatening injury.
- Media presence at the scene.
- Physical assault on a transit worker.
- Employee Injury - life-threatening injury, with immediate transport from the scene. (e.g., fall, equipment failure, on any IndyGo property).
- Any incident involving a Law Enforcement Officer or armed security officer resulting in any weapon being used to subdue any IndyGo employee, passenger, or contractor.
    - Weapons could include, but aren't limited to, firearms, tasers, knives, and pepper spray.
- Fire Event with or on any IndyGo property. (FLAMES)
- Evacuation or rescue operations.
- Terrorist threat or HSAS Red level.
- Catastrophic equipment failure (e.g., bus fire with flames and immediate evacuation)

Action:

- Dispatch activates the Everbridge Alert System.
    - If Everbridge is unavailable, follow the manual Call Tree (see Table 2).
        - Notify the appropriate group within Everbridge.
    - Begin internal investigation per FTA guidelines.
    - Risk and Safety – Will notify FTA within 2 hours via TOC email or phone.

Investigation Requirements

All Level 2 and Level 3 events must be investigated.

- Investigations must identify causal and contributing factors.
- Reports must include corrective actions and be retained per agency policy.

Communication Channels

- Primary: Everbridge Alert System
- Backup: Manual Call Tree (Table 2)
- Documentation: Email to paging group with time and contact details

Table 2 – Manual Call Tree for Level 3 Events

(Updated contact list retained from original SOP; ensure numbers are current and reviewed quarterly.)

Weekend Protocol

On-call Transportation Manager (Friday–Sunday) must be contacted by the Radio Room Supervisor for all Level 3 events.

7.15.1 Accident Reporting

Indianapolis Public Transportation Corporation (IPTC), IndyGo, established a process to operate vehicles in a safe manner that complies with all safety rules, defensive driving principles, and traffic laws for IndyGo employees. It also provides procedures for proper reporting, documentation, and classification of all vehicular accidents.

The potential for an accident to become a substantial liability to IndyGo requires that all employees be aware of and follow the vehicular accident procedures outlined in this policy. The full SOP is available on request.

1. **<u>On Scene Procedures:</u>**

    1.1 All accidents MUST be reported to the Radio Room immediately, and before moving the vehicle. You must not leave the scene of an accident without specific permission from dispatch, supervisor, or investigating police officer (unless it is determined to be a life-threatening situation) immediately following an accident, or in the event of a fire or potential fire:

    1.1.1 Turn off the engine.

    1.1.2 Activate the 4-way flashers.

1.1.3 In the event of a fire, evacuate the coach immediately.

1.1.4 Check for damage and injuries.

1.1.5 Contact radio room:

1.1.5.1 Briefly describe the accident

1.1.5.2 bus location

1.1.5.3 What type of assistance is needed?

1.1.6 Set up reflective triangles if necessary.

1.1.7 Begin securing the names, addresses, and phone numbers of all parties involved, including your passengers, by distributing courtesy cards.

1.1.8 Fill out an IndyGo Accident Report.

1.1.8.1 The operator must do this on the same day as the accident and submitted it at the end of the shift.

1.1.9 At no time should you admit liability for an accident.

1.1.9.1 If the other party involved insists on claiming the scene, refer them to the road supervisor for further information.

1.1.10 Remember to always remain calm and reassure passengers.

2. VEHICULAR ACCIDENT

2.1 Without exception, all accidents are to be reported and reviewed regardless of fault, amount of damage, or injury. Accidents are placed into one of four categories:

2.1.1 Traffic Accidents

2.1.2 Fixed Object Accidents

2.1.3 Pedestrian Accidents

2.1.4 Passenger Accidents

3. ACCIDENT REPORTING

3.1 All employees involved in an IndyGo vehicle accident or incident, whether Operator or Non-operator, must notify the on-duty dispatcher or supervisor immediately.

3.2 No employee will leave the scene of an accident involving property damage or bodily injury until so instructed by the investigating supervisor or unless necessary to make proper phone notification.

3.3 A supervisor or on-duty dispatcher must immediately notify Risk Management of any vehicular accident or incident resulting in property damage or bodily injury.

3.4 Completed accident reports by the employee must be submitted to the supervisor or service center before the end of the work shift, unless medically prohibited.

3.5 Completed accident reports by employees and supervisors must be submitted to IndyGo Risk Management by the end of the shift. This includes Saturdays, Sundays, and Holidays.

3.6 Risk Management will make necessary notifications to the Insurance Carrier.

3.7 Major incidents must be reported immediately by phone or e-mail so that insurance investigation and processing can begin without delay.

3.8 Failure to follow these procedures or attempt to conceal or misrepresent the facts of an accident or incident will result in disciplinary action up to and including termination of employment.

4. ACCIDENT EVALUATION

4.1 All accidents shall be evaluated based on the information provided by the employee on the accident report form, police reports, witness reports, supervisor reports, and any other pertinent information available.

4.2 This information will provide the basis for the classification of an accident by the National Safety Council guidelines for accident classification.

4.3 All accidents will be classified as either preventable or non-preventable.

4.4 It is the Corporation's policy to identify safety issues that an employee may have on an individual basis and to work with that employee to improve their accident record. This is accomplished through training, mentoring, coaching, check rides, and progressive discipline, when necessary, as determined by IPTC management. Standards are point-based and measured on an eighteen (18) month rolling window.

4.4.1 All preventable accidents are considered one (1) point, except

4.4.1.1 Mirror strikes resulted in damage only to the IndyGo mirror, with no other damage to the vehicle, passengers, or other property. Accidents at this level shall be ½ point.

4.4.1.2 Serious Accidents as determined by Management/Risk. Accidents at this level may be issued multiple points and be subject to termination as stated under Serious Accidents.

4.4.2 All preventable accidents require retraining.

4.4.3 Disciplinary standards for preventable accidents are based on reaching or exceeding the following thresholds:

4.4.3.1 1 preventable point: Written warning

4.4.3.2 2 preventable points: One (1) day suspension

4.4.3.3 3 preventable points: Five (5) day suspension and final warning

4.5 4 preventable points: Termination and an appeal of the classification are available. IndyGo must be notified in writing of the desire to appeal within ten (10) working days after the notice of the decision is given to the employee.

4.6 In cases where special circumstances exist, a written appeal can be made to the President/CEO of IndyGo relative to the classification assigned.

5. ACCIDENT CLASSIFICATION

5.1 Preventable: An accident in which the employee should have enough control of the situation so that he or she could have taken defensive action to prevent the occurrence.

5.2 Non-preventable: An accident in which the employee has insufficient control of the situation and defensive action could not keep the accident from occurring (e.g., an auto rear-ending the bus while the bus is legally stopped) and a four-way, amber, or proper signal device is on.

6. SUMMARY OF RESPONSIBILITIES

6.1 Employee Responsibilities:

6.1.1 Operators and non-operators must immediately notify the on-duty dispatcher or supervisor of any IndyGo vehicle accident or incident.

6.1.2 Operators with onboard passengers will distribute witness cards to be completed and returned for documentation.

6.1.3 No employee will leave the scene of an accident involving property damage or personal injury until so instructed by the investigating supervisor, Law Enforcement, or Emergency Response personnel, or unless necessary to make proper phone notification.

6.1.4 Employees must submit an accident report and any witness statements before the end of the shift unless medically prohibited.

6.1.5 The employee will cooperate fully with his/her supervisor and Risk Management in the investigation of the cause of the accident or incident.

6.1.6 The employee will remain ready and submit to any post-accident drug and alcohol testing when required by FTA regulation.

6.1.7 If an employee witnesses a pedestrian fall outside the bus, an accident report must be filed out and marked as a witness in the accident report.

6.1.8 If an employee is injured on the bus or any IndyGo property in the course of their assigned duties, an Operator Accident Report and Employee Injury Report

Form will need to be completed. The Supervisor will be notified to complete a report as well.

7. Other Considerations

13.1 An accident will not be rated preventable without the investigation of a supervisor being conducted, and a report being filed.

13.2 The investigation may include an on-site visit to the accident scene, depending on reported circumstances.

13.3 When a vehicle accident occurs off IndyGo property, employees must immediately report the accident to the IndyGo Radio Room.

13.4 Accidents occurring on IndyGo property must be reported to an on-duty supervisor immediately.

13.5 The vehicle(s) should not be moved unless the direction is given.

13.6 A serious accident determined to be caused by the negligence of an IndyGo employee may be reviewed independently. Should just cause be established, disciplinary action up to and including termination may be imposed.

8. Distracted Driving and Equipment Operation Prevention and Discipline

14.1 An Executive Order, signed by the President of the United States, on October 1, 2009, requires award recipients and contractors of the Federal Government to adopt and enforce policies that prohibit the use of portable electronic devices while driving federally or institutionally owned vehicles. This does not pertain to our IndyGo portable handheld radios.

14.2 IndyGo is committed to providing a customer-focused, safe, and reliable service to the citizens and visitors of our service area.

14.3 IndyGo has adopted a practice of applying strict liability regarding the wearing and/or use of electronic/computer devices that allow receipt of personal calls, texts, timekeeping, recording, playback, and other actions that distract from the safe operation of corporation vehicles. This prohibition includes talking, texting, listening to, or looking at a cell phone, smartwatch, Bluetooth, or other electronic/computer devices.

14.4 Cell phone and other electronic/computer device use are only permitted when the vehicle is not in “operation” status. A vehicle is considered in “operation” status unless it is in a parked position with its flashers on (if applicable) and the operator is out of the operator’s seat. IndyGo employees may call the Service Center, their dispatcher, or police from their seats, provided that the vehicle is safely stopped.

14.5 In emergencies, family members can contact either the employee's Supervisor or the Service Center. The employee can then be contacted via radio and/or by their supervisor.

14.5.1 This provision includes but is not limited to all IndyGo vehicles, forklifts, lawnmowers, or any piece of equipment requiring the full attention of the person operating it.

14.6 Violations of this Policy may be subject to progressive discipline up to and including immediate termination, absent extraordinary circumstances.

9. The corporation lawyers shall represent operators summoned to appear at the police department, the attorney's office, or in court relating to an accident if the accident occurred within the scope of their employment.

15.1 Operators are prohibited from making any public statements regarding an accident.

15.2 Operators should cooperate fully with the proper authorities at the scene of an accident but refer all other inquiries to the road supervisor.

15.3 Failure to report an accident or any attempt to conceal or misrepresent the facts of an accident will be cause for dismissal.

***Work Rule Additions and/or Changes*: IndyGo Management reserves the right to make changes, additions, or deletions to these Work Rules, as necessary. Employees will be given specific written notice of any such changes**.

7.15.2 Accident Investigation(s)

Indianapolis Public Transportation Corporation (IPTC), IndyGo, established a process to operate vehicles in a safe manner that complies with all safety rules, defensive driving principles, and traffic laws for IndyGo employees. It also provides procedures for proper reporting, documentation, and classification of all vehicular accidents. The full SOP is available on request.

Definitions:

- Accident - an unfortunate incident that happens unexpectedly and unintentionally, typically resulting in damage or injury.
- Incident- an event or occurrence. A minor collision or non-collision accident
- Preventable- An accident in which the driver failed to take every reasonable precaution to prevent the accident.
- Non-preventable- Any occurrence involving an accident/incident in which everything that could have been reasonably done to prevent it was done, and the accident/incident still occurred.

On Scene Procedures

- All accidents MUST be reported to the Radio Room immediately, and before moving the vehicle. You must not leave the scene of an accident without specific permission from dispatch, supervisor, or investigating police officer (unless it is determined to be a life-threatening situation) immediately following an accident, or in the event of a fire or potential fire:
    - Turn off the engine.
    - Activate the 4-way flashers.

- In the event of a fire, evacuate the coach immediately.
- Check for damage and injuries.
- Contact radio room:
  - Briefly describe the accident
  - bus location
  - What type of assistance is needed?
- Set up reflective triangles if necessary.
- Begin securing the names, addresses, and phone numbers of all parties involved, including your passengers, by distributing courtesy cards.
- Fill out an IndyGo Accident Report.
  - The operator must do this on the same day as the accident and submit it at the end of the shift.
  - At no time should you admit liability for an accident.
  - If the other party involved insists on claiming the scene, refer them to the road supervisor for further information.
- Remember to always remain calm and reassure passengers.

Vehicular Accident

- Without exception, all accidents are to be reported and reviewed regardless of fault, amount of damage, or injury. Accidents are placed into one of four categories:
  - Traffic Accidents
  - Fixed Object Accidents
  - Pedestrian Accidents
  - Passenger Accidents
- **Transportation Supervisor Responsibilities:**
  - The supervisor will immediately respond to any report of a vehicular accident or incident to begin an investigation.
  - The supervisor will ensure that all medical needs of involved personnel are immediately communicated to the on-duty dispatcher for further assistance if necessary.
  - In case of an “injured” Operator with onboard passengers, the Supervisor will distribute witness cards to be completed and returned for documentation.
  - The investigating supervisor will take photographs of the accident whenever possible.
  - A supervisor or on-duty dispatcher will immediately notify Risk Management of any vehicular accident or incident involving property damage or bodily injury.
  - The supervisor will give the other party involved in the accident an IndyGo Accident Information Card.
  - This form will have basic information for the other party on:
    - Date and Time of Incident
    - Location
    - Bus Number
    - Route
    - Instructions on follow-up for their accident claim.

Basic Accident Investigation

- On-scene Interviews
  - Basic Principles to remember:
  - Courtesy and Patience
  - Asking Good Questions
  - Note Taking
  - Written Statements (Courtesy Cards)
- For conducting on-scene interviews with people not employed by the company, it is suggested that witnesses be interviewed separately and away from each other, if possible.
- At the initial stages of the interview, immediately following a collision, group interviews should be avoided. Generally, a group interview results in one or two people doing the talking and the others concurring, even if they don't agree with what the two main speakers are relating.
- The witness must understand who you are, whom you represent, and what it is you are trying to find out.
- Witnesses should be approached positively, and the investigator should approach them with the attitude that they will be willing to talk. "You don't want to talk to me about this accident, do you?" will almost certainly elicit a negative response. "I'd like to talk to you about what happened here" will generally put the witness in a more cooperative state.
- Remember, you should make the person feel that his or her information is important and may be of great value in preventing similar collisions.

Basic Report Writing

- Report writing is an organized accumulation of:
  - Facts
  - Conditions
  - Observations
- Provide objective information for management.
- Provide a historical record of the contributing factors.
- Present conclusions.
- Make safety improvement recommendations.
- Have a plan and use the five-step approach:
  - Step 1: Review all materials for clarity.
  - Step 2: Organize the materials.
  - Step 3: Outline the report.
  - Step 4: Draft and review the report.
  - Step 5: Prepare the final report.
- Interviews (Are follow-ups needed?).
- Sketches (Measurements indicated? Enough for scale diagram? Need to revisit the site?).
- Photographs and other documents (Are they in order? Numbered or identified? Can you explain everything shown?).

- Other sources of data (Computer databases, weather information, emergency services reports, regulatory information, technical material, etc.).
- Executive Summary.
- Chronological order of events (Before, during, after).
- Analysis of events (Who, what, where, when, and how).
- Summary of the collision/incidents.
- Conclusions and/or findings.
- Recommendations.
- Appendix.
- Is it objective? (No speculation, just the facts).
- Does it "flow"? (Easy to follow).
- Is it accurate? (Do all the numbers agree with the sketches? Did you check the math calculations?
- Are spelling, grammar, and punctuation correct? (Proper use of conjunctions & adverbs).
- Could someone who wasn't at the scene understand what happened by reading the report? (Is it in plain language?).
- REMEMBER: The report is yours. It has your name on it. It represents the work you do as the on-scene accident investigating supervisor.
- Make a final check for accuracy, spelling, grammar, and punctuation.
- Make a final review of the clarity and organization of the materials.
- Turn it in with pride!

7.15.3 Accident Review Board-ARB

Indianapolis Public Transportation Corporation (IPTC), IndyGo, established a process to operate vehicles in a safe manner that complies with all safety rules, defensive driving principles, and traffic laws for IndyGo employees. It also provides procedures for proper reporting, documentation, and classification of all vehicular accidents. The full SOP is available on request.

Accident Policy

A. Per the Corporation's Work Rules, the Accident Policy is as follows.
    a. Operating IndyGo vehicles in a safe manner that complies with all safety rules, defensive driving principles, and traffic laws is the primary job function for a majority of IndyGo employees. Employees are expected and obligated to perform this primary job function in an exemplary manner, so they are not involved in preventable accidents.
    b. Defensive driving is what distinguishes the professional from the average motorist. Defensive drivers make allowances for the mistakes of others by surveying the road to spot possible hazards and driving in such a manner as to avoid the hazards. This contrasts with the typical motorist who drives unaware and, at times, must take emergency action to avoid an accident. The defensive driver maintains a space cushion around his/her vehicle that is clear of hazards and works to always maintain that cushion.
    c. It is the policy of the Corporation that all employees are to use defensive driving techniques, including but not limited to being aware of the hazards around them,

maintaining a safe driving distance from other vehicles, anticipating other drivers' actions whenever possible, and always driving according to existing weather conditions.

B. Preventable Accident Policy.
   a. All accidents are investigated by the Director of Risk and Safety or their designee, by investigative principles and techniques for which they were trained.
   b. The Director (or their designee) then classifies the accident as preventable or non-preventable, as set by the National Safety Council standards to determine preventability, and it is defined as follows.
      1. A **preventable** accident is one in which the driver fails to do everything that reasonably could have been done to avoid a collision or incident. In other words, when a driver commits errors and/or fails to react reasonably to the errors, the accident is considered preventable.
      2. A **non-preventable** accident is one in which the driver did everything reasonably to avoid a collision or incident. In other words, the driver commits no errors and reacts reasonably to the errors of others.
   c. It is an IPTC, IndyGo policy to identify safety issues that an employee may have on an individual basis and to work with that employee to improve their accident record. This is accomplished through training, mentoring, coaching, ride checks, and progressive discipline when necessary.
   d. All preventable accidents are considered one (1) point, except
      i. Mirror strikes resulted in damage only to the IndyGo mirror, with no other damage to the vehicle, passengers, or other property. Accidents at this level shall be ½ point.
      ii. Serious Accidents as determined by IndyGo Management and the Risk and Safety Department. Accidents at this level may be issued multiple points and be subject to termination as stated under Serious Accidents.
   e. All preventable accidents require retraining.
   f. Disciplinary standards for preventable accidents are based on reaching or exceeding the following thresholds:
      i. 1 preventable point: Written warning
      ii. 2 preventable points: One (1) day suspension
      iii. 3 preventable points: Five (5) day suspension and final warning
      iv. 4 preventable points: Termination

7.15.4 Risk and Safety Review of Accidents for Hazard Resolution

The Risk and Safety Department will review all Level II and Level III Accidents to assign a hazard rating utilizing the hazard rating chart within this document. Risk and Safety will review all documented reports, interview necessary parties, review photos, and make available video to determine the Hazard Grade for the reported accident.

Risk and Safety will document and track the accident hazard grades to follow trends and report safety hazards to the responsible departments to address.

7.15.5 Federal Transit Administration (FTA)

FTA notification will be provided per FTA requirements, as stipulated by FTA or the MPO. IndyGo will then be required to contact the U.S. Department of Transportation Crisis Management Center (CMC) within two hours of a reportable accident, by email (recommended method) or phone:

CMC-01@dot.gov / 202-366-1863

Two-Hour Accident Notification Guide

The Federal Transit Administration's (FTA) State Safety Oversight (SSO) regulation (49 C.F.R. Part 674) establishes definitions and minimum notification thresholds for safety events. Part 674 defines three types of safety events: accidents, incidents, and occurrences, and requires a rail transit agency (RTA) to notify its State Safety Oversight Agency (SSOA) and the FTA within two hours of any event classified as an accident. This Two-Hour Accident Notification Guide is designed to help RTAs identify those events that are classified as accidents and how to notify FTA.

What is an "Accident"?

"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 involving a **rail transit** vehicle; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause." 49 C.F.R. § 674.7.

What is the requirement to notify the SSO and FTA of an accident?

In addition to the requirements for accident notification outlined in an SSO program standard, an RTA must notify both the SSOA and the FTA within two hours of any accident occurring on its rail-fixed guideway public transportation system. An RTA should provide accident notifications at the earliest practicable time after the occurrence of any one of the defined accidents and no later than two hours after the accident occurred.

How do I notify FTA of an accident?

Contact the U.S. Department of Transportation Crisis Management Center (CMC) within two hours of a reportable accident, by email (recommended method) or phone:

CMC-01@dot.gov / 202-366-1863

When providing two-hour notifications, please submit accident information details as specified in your SSOA's program standard. The SSO-required notifications may include, but are not limited to, a summary of the event and pertinent details such as:

- Number of fatalities
- Number of serious injuries (include type of injury if known)
- Primary and secondary event types (e.g., collision, derailment, fire, etc.)

What types of collisions require a two-hour notification? You are required to provide a two-hour notification of all collisions involving two or more rail transit vehicles, and all collisions involving at least one rail transit vehicle at a grade crossing, with a person, or with an object that results in substantial property damage, serious injury, or fatality.

What is “substantial damage”? Substantial damage is any physical damage to transit or non-transit property, including vehicles, facilities, equipment, rolling stock, or infrastructure.

Substantial damage includes damage that adversely affects the structural strength, performance, or operating characteristics of the vehicle, facility, equipment, rolling stock, or infrastructure requiring towing, rescue, onsite maintenance, or immediate removal before safe operation.

See National Transit Database glossary.1 1 The NTD glossary is available at https://www.transit.dot.gov/ntd/national-transit-database-ntd-glossary.

Substantial damage excludes damage such as cracked windows, dented, bent, or small punctured holes in the body, broken lights, mirrors, or removal from service for minor repair or maintenance, testing, or video and event recorder download.

What is an evacuation for a life safety reason?

An evacuation for a life safety reason is a condition that occurs when persons depart from transit vehicles or facilities for life safety reasons, including self-evacuation. A life safety reason may include a situation such as a fire, the presence of smoke or noxious fumes, a fuel leak, a vehicle fuel leak, an electrical hazard, a bomb threat, a suspicious item, or other hazard that constitutes a real potential danger to any person.

Do not provide Two-Hour Accident Notifications for evacuations that are not for a life safety reason, such as an evacuation of a train into the right of way or onto adjacent track; or customer self-evacuation or transfer of passengers to rescue vehicles or alternative means of transportation due to obstructions, loss of power, mechanical breakdown, system failures, or damage.

Chapter 8- Management of Change

8.0 Managing Safety in System Modifications

8.0.1 System Modification

Any safety-critical change or modification to IndyGo's Transportation equipment or system is controlled to ensure that hazards are appropriately identified and controlled in the plans and designs of the modified equipment or system.

8.0.2 System Modification Coordination

8.0.2.1 Physical Assets

Proposed modifications to physical assets—facilities, rolling stock, equipment, and infrastructure--are coordinated by the Facilities and Vehicle Maintenance Departments with the participation and review of Safety, Security, Procurement, Operations, and Maintenance.

The Chief Development Officer and the Deputy COO are tasked with ensuring that equipment purchased by IndyGo meets the established safety and security requirements and that design requirements have been coordinated with all appropriate departments. The Facilities and Maintenance departments guide and direct the inspection and testing activities necessary to ensure that the equipment and operations result in the desired level of safety/security documents equipment and facility modifications and inform affected staff of modifications. The Chief Development Officer has the authority to stop work on all unauthorized modifications.

8.0.2.2 Organization and Administration Changes

Changes to the organizational structure, documentation (programs, plans, procedures, protocols, etc.), training programs, institutional requirements, and other safety-critical areas not directly part of a physical asset are coordinated by the Risk and Safety Department.

The Director of Risk and Safety is tasked with ensuring that any changes introduced in non-physical system assets are assessed for their risk, including the mitigation of existing hazards, new hazards introduced into the system by change, and ensuring executive management has the information it needs to ensure acceptable risks are maintained for the agency.

8.1 Safety Certification

8.1.1 Certification Purpose

The purpose of the IndyGo Safety and Security Certification Program Plan is to ensure that hazards are appropriately identified and managed throughout all IndyGo major capital projects[5], including systems, equipment, facilities, plans, procedures, and training programs, are systematically reviewed for compliance with established system safety and security design criteria requirements, and so verified before initiation into revenue service.

For large projects, a specific Safety Certification Plan is developed. For smaller projects – which primarily involve enhancements or additions to the existing system, this process is handled during the reviews conducted for system changes.

[5] An FTA requirement for projects more than $100,000,000 and for new system or extensions.

IndyGo's safety certification process is consistent with FTA's guidelines for Safety and Security Certification, published in 2002.

Safety and Security Certification at IndyGo is defined as the process of addressing conditions that could result in harm – whether unintentional (safety) or intentional (security), and verifying satisfactory compliance with IndyGo's Safety Plan, ERP, and SSP, appropriate codes, guidelines, standards, and safety and security-related design criteria and technical provisions.

Certification for safety and security is NOT contractual acceptance. Contractual acceptance is defined as an action by an authorized representative of the transit agency by which the agency assumes full or partial ownership of the delivered product as the complete or partial performance of a contract. Contractual acceptance does not constitute safety and security certification, and safety and security certification need not imply acceptance concerning contract performance.

8.1.2 Certification Responsibilities

IndyGo's Planning and Capital Projects Department is responsible for IndyGo's capital improvement programs, which include the planning phases, design/engineering phases, and the construction and close-out phases.

Authority for implementing the IndyGo Safety and Security Certification Program rests with the Chief Development Officer. The Safety and Security Certification Review Committee (SSCRC) is chaired by the Director of Risk and Safety and is a subcommittee of IndyGo's Executive Leadership Team. The SSCRC has been established to monitor the safety and security certification process for major capital projects as a multi-disciplined, cross-functional group representing IndyGo and its designated contractors. The SSCRC is comprised of a project and IndyGo's managers and staff having expertise in systems engineering, facilities engineering, maintenance engineering, construction management, operations, systems integration, and system safety and security. A representative of the MPO may participate in SSCRC activities as an advisor.

The SSCRC is responsible for managing and coordinating all safety and security certification activities, including review of the safety and security-related tests and other documentation submitted. The SSCRC chairperson or designee prepares and issues SSCRC meeting minutes that include a list of safety and security open items. The SSCRC makes the initial review and recommendation for approval of:

- Safety and security certification plans, including forms to be used in the process.
- Safety/security certifiable elements and sub-elements lists
- Draft safety and security verification checklists
- Completed safety and security verification checklists.
- Assessment of existing IndyGo operations, maintenance, and training programs adequacy, safety, and security
- Safety and security test plans and procedures

The SSCRC also has the responsibility of monitoring the processing and retention of safety and security certification documentation.

8.1.3 Certification Objectives

The following safety and security objectives are considered during all activities of all major projects and modifications that require safety/security certification.

Table L Safety and Security Certification Objectives

Objectives
Establish a formalized process that is sufficiently documented to verify compliance with system safety and security requirements.
Ensure that system safety and security are an integral part of the design, procurement, construction, testing, and operations.
Ensure that system safety and security decisions are made by appropriate Project Managers, committees, and responsible contractors.
Ensure that system safety and security hazards and vulnerabilities that become apparent during reviews, audits, inspections, or system testing are resolved, either by redesign, use of safety/warning devices, or by implementation and enforcement of special procedures.
Ensure those outside response agencies, including the affected emergency partners, are prepared to respond to all types of emergencies.

A description of the activities required by the FTA for implementing a safety and security certification program for a major capital project at IndyGo is shown in the table below. Please note that safety and security certification implementation falls to different entities in the agency; in the case of major capital projects, as stated in this section, the responsibility falls to the Chief Development Officer.

Table M Milestones for Safety and Security Certification Activities

Milestones for Safety and Security Certification Activities							
Safety and Security Certification Activity	Planning	Preliminary	Final Design	Constructio	Integrated	Pre-Revenue	Operations
Document control	✓	→	→	→	→	→	→
Development of a safety and security certification plan		✓	→	→	→	→	→
Hazard and vulnerability assessment and resolution		✓	→	→	→	→	→
Criteria and design review		✓	→	→	→	→	→
Develop a safety certifiable elements and sub-elements list.		✓	→	→	→	→	→
Evaluate and resolve fire/life safety issues and monitor fire/life safety compliance.		✓	→	→	→	→	→
Develop criteria conformance review checklists.		✓	→	→	→	→	→

Evaluate security provisions incorporated in system elements for adequacy and safety.		✓	→	→	→	→	→
Develop criteria conformance review checklists.		✓	→	→	→	→	→
Evaluate security provisions incorporated in system elements for adequacy and safety.			✓	→	→	→	→
Manage safety, system security, and the open items list.			✓	→	→	→	→
Develop safety and security verification checklists.			✓	→	→	→	→
Complete safety and security verification checklists for the system				✓	→	→	→
Complete safety and security verification checklists for civil work				✓	→	→	→
Develop and implement contractor test plans and procedures.				✓	→	→	→
Contractor test reports/results.				✓	→	→	→
Develop integrated test plans and procedures.				✓	→	→	→
Manage the integrated test program.				✓	→	→	→
Integrated test reports/results					✓	→	→
Develop contractor's operations and maintenance procedures, and training plans/programs.					✓	→	→
Assess existing Authority operations and maintenance procedures and training plans/programs for adequacy and safety.						✓	→
Issuance of safety certification						✓	→

To ensure that IndyGo management and staff, and others as appropriate, remain informed of the status of the safety and security certification effort, progress reports are prepared by the certification committee and submitted to SSCRC for review and approval.

- The reports advise the SSCRC of the following:
- Checklists and Notice of Verification Reports completed during the reporting period.
- Problems encountered and restrictions enforced.
- Major modifications made to the Certifiable Elements and Sub-Elements List
- Checklists and Notices of Safety and Security Verification Reports are expected to be completed in the upcoming report period.
- Certification progress to date

8.2 Configuration Management

Configuration management for IndyGo is defined as the identification and documentation of the functional and physical characteristics of facilities, systems, equipment, and vehicles, including the control of changes to these elements. Required configuration information is maintained and tracked by documenting test/modified equipment, as well as relevant serial numbers and dates of the installation of standard equipment.

IndyGo maintains standard operating procedures for control of change in the organization, including configuration management.

The Chief Development Officer is responsible for storing and retrieving facilities and equipment configuration information, as well as informing affected staff of configuration changes promptly and keeping the data current. The Deputy Chief of Fleet, Maintenance & Facilities is responsible for maintaining configuration changes of Bus/Paratransit/Auto/ Truck Maintenance and other non-revenue vehicle equipment and is responsible for informing affected staff of configuration changes promptly.

Any changes to a system, subsystem, facility, or fleet/inventory-wide changes are recorded on as-built drawings in a timely and effective manner.

8.3 Process for Changes

Configuration changes are classified according to their impact and functional importance to operations.

Class 1 changes are defined as hardware, material, or software changes that affect facilities, systems, vehicles, or equipment performance, specification requirements, previously approved documents, or interchangeability with existing components. Class I changes are reviewed by the Executive Leadership Team for their safety/security implications and submitted with appropriate documentation to the Deputy Chief of Fleet, Maintenance & Facilities, or Chief Development Officer as appropriate for approval.

Class 2 changes are defined as hardware, material, or software changes that do not affect facilities, systems, vehicles, or equipment performance, specification requirements, previously approved documents, or interchangeability with existing components. Class II changes are submitted to the Executive Leadership Team for information.

If hazards are introduced by a change, these hazards are documented and tracked in IndyGo's Hazard Management Log until they are resolved.

8.4 Authority for Change and Notification

The Deputy Chief of Fleet, Maintenance & Facilities, and Chief Development Officer are notified in writing and have the authority and approval responsibility for Class 1 and Class 2 changes, as applicable to their area of responsibility. In addition, the Executive Leadership Team is notified and has a review and comment responsibility for Class 1 and Class 2 changes. IndyGo SOPs, contract provisions, and capital program documents contain the specific elements for change orders as they apply to construction and the purchase of new systems and vehicles.

8.5 Procurement

8.5.1 Procurement Structure

IndyGo is responsible for the procurement of IndyGo capital needs through specific FTA-regulated procurement policies. In addition, IndyGo is responsible for its internal procurement needs to run the day-to-day operational needs of the agency.

The purchasing process formally begins with the preparation of a request and its submission to the Senior Director of Procurement; however, planning for contracts and procurement actions begins far in

advance of this time. Advance procurement planning includes safety as a significant factor by addressing system safety as well as technical, business, management, and other considerations that will control acquisition actions from inception through completion. A thorough inspection and system testing are performed before equipment or facilities are accepted. For example, at present, there is a process utilized by the maintenance group to visually inspect select parts and components.

Procurement for hazardous materials addresses the requirement(s) for compliance with the appropriate rules and regulations within the procurement document itself, e.g., the RFP.

8.5.2 Coordination with the Risk and Safety Department

The Procurement Department works in conjunction with the Risk and Safety Department when purchasing personal protective equipment for employees, controlling chemicals and other hazards in the workplace, mandating safety requirements in specific contracts, and requiring compliance from specific vendors with IndyGo's safety requirements.

Procurements of new equipment, materials, and supplies are first reviewed by the user department in conjunction with the Risk and Safety Department, and, as appropriate, by the Operations and/or Maintenance staff, to ensure safety within the existing and/or proposed system.

Chapter 9- Continuous Improvement

IndyGo defines continuous improvement 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.

IndyGo employs a four-step strategy to evaluate its SMS program to ensure that continuous improvement is a robust process for the agency:

- Develop and maintain formal activities to evaluate the effectiveness of the SMS.
- Identify the causes of sub-standard performance of the SMS.
- Determine the implications of sub-standard performance of the SMS in operations.
- Eliminate or mitigate such causes.

Key elements of IndyGo's strategy include:

1. Documenting, evaluating, and improving Safety Risk Management processes and outputs. IndyGo performs this activity throughout all departments and functional areas. Once SMS requirements and responsibilities are fully documented in each area, the internal controls program as described in this Safety Plan is implemented and monitored by the Safety Department through the triennial Internal Safety and Security Audit Program to ensure it identifies and appropriately mitigates all hazards; and assesses fully SMS implementation in every area. Effective corrective action must be implemented to mitigate hazards identified through monitoring and measurement, and again, these mitigations are monitored on an ongoing basis for hazard management.

2. Documented compliance activities, including formal and informal assessments, inspections, observations, document audits, and other controls to continually assess SMS compliance and identify hazards. For these activities also, effective corrective action must be implemented to mitigate hazards identified through monitoring and measurement, and again, these mitigations are monitored on an ongoing basis for hazard management.

3. Management of change, through ensuring that any risk of introducing hazards through change is reduced to the lowest practical level through documented procedures and processes and then ongoing monitoring and measurement to identify residual hazards and risk, which, again, require effective corrective action to be implemented to mitigate hazards identified through monitoring and measurement, and again, these mitigations monitored on an ongoing basis for hazard management.

This process can be graphically represented thus:

Table N Safety Risk Management Process

Part 4 Safety Promotion

Chapter 10- Safety Communication

IndyGo communicates safety and safety performance information throughout IndyGo that 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 an employee safety reporting program, among other information.

IndyGo understands that SMS is dependent upon ongoing management commitment to communication. One of management's most important responsibilities under SMS is to encourage and motivate others to want to communicate openly, authentically, and without concern for reprisal.

Representative of IndyGo's commitment is our employee reporting policy and program, as described below.

10.0 IndyGo Operator Selection and Hiring Practices

Indianapolis Public Transportation Corporation, dba IndyGo, is committed to providing equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type, regardless of age, race, creed, color, disability, religion, sex, national origin, ancestry, physical or mental disability, sexual orientation, and genetic information.

The purpose of this manual is to provide a detailed overview of the process the Talent Acquisition team utilizes to establish a clear standard operations procedural roadmap. All hiring of employees should be done by the IndyGo Employment policies.

It shall be the policy of IndyGo to recruit and select employment candidates who are qualified based on the essential and marginal skills that have been identified for the open positions within IndyGo's service. IndyGo recruits' candidates, both externally and internally, for vacant positions at all levels, in accordance with Federal, State, and local laws. Individuals may be recruited for position vacancies from a geographic area as wide as necessary to ensure obtaining well-qualified candidates.

The procedures outlined in the following manual provide step-by-step instructions to ensure all future and present employees are screened, promoted, and hired fairly.

With this manual, Talent Acquisition will meet the business needs of both our hiring managers and our organization. With the advice of our executive team, we will work together to identify the position vacancies, skills, knowledge, education, and any additional qualifications that are required.

- IndyGo has both Union and Non-Union roles; the hiring practices are similar yet different according to what status each position holds.

**Any questions regarding the Union Roles should be referenced in the Union Contract.*

Below is a summary of the steps taken during the hiring and selection process. Please refer to the Department of People - Human Resources manual for further details.

- Vacancy Fulfillment Request Forms
- Intake meetings

- Reference checks
- Background Checks
- Job offers.
- Creation of Candidate Evaluation Forms
- Creation of Job Description Forms

10.1 Employee Safety Reporting Systems

Indianapolis Public Transportation Corporation (IPTC), IndyGo, has established a near-miss reporting system for employees to utilize when reporting a safety concern within the facility or any job function.

DEFINITIONS:

Near Miss Reporting- Reporting a near miss can ensure that future incidents and injuries are avoided. A near miss, also known as a close call or near hit, is defined as an unplanned event that did not result in injury, illness, or damage – but had the potential to do so.

1. Employee(s) Procedure:
   1.1 Employees can access the anonymous Near Miss Safety Reporting system by scanning the QR Code or utilizing the internet access link.
   1.2 Employees will complete the form online and ask for follow-up or mark it as anonymous.
2. Risk and Safety Department Procedures:
   2.1 Risk and Safety will receive notification of a new Near Miss Safety Event report.
   2.2 Risk and Safety will then review the safety event.
   2.3 Risk and Safety will assign the appropriate department leader to review and address the safety concerns.
   2.4 Risk and Safety will assign a follow-up date to ensure the safety event was addressed and corrected.
   2.5 Risk and Safety will review the follow-up of the safety event resolution and complete a reassessment within the Near Miss Report program.
   2.6 If the safety event is not addressed, then the event will remain open, and follow up with the department director.
      2.6.1 The chain of command will be followed to address and resolve all reported safety concerns.
   2.7 Risk and Safety will document all findings and close the safety event within the system.
   2.8 Risk and Safety will post a monthly summary report on all near miss reporting concerns, findings, resolutions, and timeline to closure.
      2.8.1 Summary reports will be posted on the employee safety boards located in the employee lounges.
3. Near Miss Incident Investigation:
   3.1 Risk and Safety will receive notification of a new Near Miss Safety Event report.
   3.2 Risk and Safety will then review the safety event.
   3.3 Risk and Safety will utilize the Mil-Spec 882 Matrix for Hazard Assessment.

Hazard Classification Matrix

Frequency of Occurrence	Hazard Categories			
	Catastrophic (1)	Critical (2)	Serious (3)	Minor (4)
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (F)	Eliminated			

3.4 The following describes the definitions used in identifying and assigning a severity level.

Severity Definitions				
Category	**Technical Definitional**	**Human Cost**	**Property Cost**	**Other Impacts**
Catastrophic	Could result in death, permanent disability, or complete system loss could result from an incident caused by a hazard.	Death and permanent disability of multiple persons	The loss will exceed $1M	Irreversible environmental damage
Critical	This could result in multiple severe injuries, disability, or major system loss that will result from incidents caused by hazards.	Hospitalization of 3 or more people; single fatality.	Loss between $500K and $1M	System interruption is greater than 24 hours.
Serious	Conditions are such that injuries to 2 or more people and/or severe damage to the system and components may occur.	Immediate medical care away from the scene for two or more persons.	Loss between $100K and $500K	System interruption is less than 24 hours.
Minor	Conditions are such that injury may result in a person – minor system damage. Minor injury or damage.	Immediate medical care (EMS) away from the scene for 1 person or no medical attention	Loss between $10K and $100K	Minor system interruption. No system interruption; “Near Miss” category

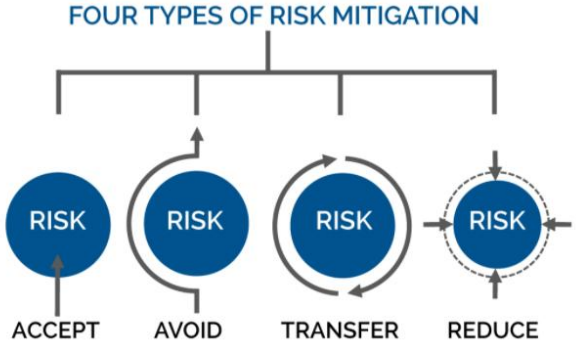
3.5 Response and Resolution:

3.5.1 Avoid: In general, risks should be avoided that involve a high probability of impact on both financial loss and damage.

3.5.2 Transfer: Risks that may have a low probability of taking place but would have a large financial impact should be mitigated by being shared or transferred, e.g., by purchasing insurance, forming a partnership, or outsourcing.

3.5.3 Accept: With some risks, the expenses involved in mitigating the risk are more than the cost of tolerating the risk. In this situation, the risks should be accepted and carefully monitored.

3.5.4 Limit: The most common mitigation strategy is risk limitation, i.e., taking some type of action to address a perceived risk and regulate exposure. Risk limitation usually employs some risk acceptance and some risk avoidance.



3.6 Resolution process:

3.6.1 A Risk and Safety team member will utilize the Near Miss Reporting System.

3.6.1.1 Team members will complete the initial sections identifying the hazard.

3.6.2 Assign the near-miss report to the identified department leader.

3.6.3 Communicate to the department leader the near-miss incident, the currently identified hazard level, and the time frame for resolution, which should be returned to Risk and Safety.

3.6.4 Follow-up to ensure the identified hazard has been addressed.

3.6.5 Document the resolution within the Near Miss report.

3.6.6 Once the hazard has been resolved, a Risk and Safety team member will go to the department where the hazard originally resides and ensure the resolution.

3.6.7 Track and report resolution status to the employees who want a follow-up.

3.6.7.1 Post Near Miss data on the Safety Information Boards (i.e., number of reports received vs. number of reports resolved)

3.6.8 Utilize the IndyGo Risk Register to track the number of reported hazards versus the reported hazards that have been resolved.

4. The following self-reported (employees committing violations and subsequently reporting themselves to management) violations can be reported as an initial instance without disciplinary action:

5.1.1 Red Signal violations resulting in an accident, injury, or property damage.

5.1.2 Failure to report an adverse event immediately, but within 4 hours of occurrence. All information connected to the investigation of the reported event will fall under this protection.

5.1.3 Hours of Service violations.

5.1.4 Failure to wear proper PPE.

5.1.5 Operating a revenue vehicle without proper equipment and uniform, including carrying the CDL on the employee's person.

5.1.6 Fatigue presents an unacceptable hazardous condition if duties are continued.

5.2 The second instance of a self-reported violation will be evaluated by the Director of Operations, the appropriate Maintenance Director, and the Director of Risk and Safety to determine if circumstances warrant disciplinary action.
5.3 A third instance of the same violation will result in disciplinary action, whether self-reported or not.

Near Miss Policy Statement:

> Safety is a core objective of Indianapolis Public Transportation Corporation (IPTC), DBA IndyGo. IndyGo is committed to developing, implementing, maintaining, and continuously improving processes to ensure the safety of its customers, employees, and the public. IndyGo has established a safety-reporting program as a way for employees to voice their safety concerns. Employees can report anomalously as their option. All employees will be responsible for utilizing this program as part of our safety management plan. No punitive action will be taken against an employee who communicates a safety concern through the safety-reporting program unless such disclosure indicates the following: An illegal act, gross negligence or misconduct, a deliberate or willful disregard of IndyGo rules, policies, or contracts.
>
> **Near miss** — a safety event where conditions with the potential to generate an accident, event, or occurrence existed, but where an accident, event, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations. [SMS]
>
> Near Miss Reporting- Reporting a near miss can ensure that future incidents and injuries are avoided. A near miss, also known as a close call or near hit, is defined as an unplanned event that did not result in injury, illness, or damage – but had the potential to do so.
>
> Every IndyGo employee is required to report any hazard or unsafe condition to his or her Supervisor, Department Manager or other appropriate authority as defined in this Safety Plan. Most hazards in the system are identified in the field and reported to the Service Center or Radio Room Dispatch. Any employee may communicate the identification of a potential hazard directly to the Director of Risk Safety or any Risk and Safety staff member verbally or in writing or by communicating through other communication channels. Each report will be thoroughly investigated under the direction of the Director of Risk and Safety, and, if the employee has not reported it anonymously, the Director of Risk and Safety will ensure that the results of the investigations and any corrective action will be reported back to the reporting employee. If an employee reports and requests anonymity, IndyGo will provide anonymity for all valid concerns. IndyGo is committed to maintaining a robust, positive safety culture. With your help, IndyGo can investigate hazards to eliminate them if possible. Safety is all of our responsibilities.
>
> Thank you for taking the time to report hazards and or unsafe acts.

10.2 Employee Self-Reporting Protections

The following self-reported (employees committing violations and subsequently reporting themselves to management) violations can be reported as an initial instance without disciplinary action:

- Red Signal violations do not result in an accident, injury, or property damage.
- Failure to report an adverse event immediately, but within 4 hours of occurrence.
    a. All information connected to the investigation of the reported event will fall under this protection.
- Hours of Service violations.
- Failure to wear proper PPE.

- Operating a revenue vehicle without proper equipment and uniform, including carrying the CDL on the employee's person.
- Fatigue presents an unacceptable hazardous condition if duties are continued.

The second instance of a self-reported violation will be evaluated by the Deputy Chief Transportation Officer, the appropriate Maintenance Director, and the Director of Risk and Safety to determine if circumstances warrant disciplinary action.

A third instance of the same violation will result in disciplinary action, whether self-reported or not.

10.3 Protections for Employees Reporting Adverse Safety Conditions

IndyGo is committed to maintaining a robust, positive safety culture. As part of that commitment, IndyGo will protect employees who report adverse safety conditions to management. Any employee who reports a valid violation, unsafe act, or condition, or other safety concern to management will not experience any reprisal from management. Each report will be thoroughly investigated under the direction of the Director of Risk and Safety, and, if the employee has not reported anonymously, the Director of Risk and Safety will ensure that the results of the investigations and any corrective action will be reported back to the reporting employee.

If an employee reports and requests anonymity, IndyGo will provide anonymity for all valid concerns.

10.3.1 Unprotected Self-Reporting

No willful violations will be subject to self-reporting protections. This includes but is not limited to any violations of Drug and Alcohol policies or requirements, criminal acts, or failure to report any criminal acts immediately.

10.4 Safety Program Communications

Methods of communicating safety information to IndyGo employees include face-to-face meetings and interactions, posting and/or distribution of bulletins, department notices, and memoranda.

Posted information can be found at a central location in each department, easily accessible to employees. Other communication methods include posters, signs, brochures, training materials, rule books, and operating procedures.

IndyGo's comprehensive employee safety program includes the following elements:

- Facility/location safety inspections and audits with written reports and follow-up responses to employees as appropriate;
- Periodic employee awareness training;
- Monthly safety committee meetings;
- Special request employee safety training programs;
- Local fire department facility tours, and first responder training/drills with IndyGo employees;
- Safety posters;
- Annual workers right-to-know programs and industrial safety training; and
- Periodic insurance carrier/broker assessments.

Chapter 11- Competencies and Training

IndyGo has established a comprehensive safety training program for all agency employees and contractors directly responsible for the management of safety in IndyGo's system. The training program includes refresher training, as necessary.

11.0 Training Program

11.1 Training and Education Policy

New Bus Operators receive an intensive two-week training course that covers every aspect of their new job. Some components of the training are delivered in the classroom. Most of the learning occurs on the buses during off-route and on-route training. The training includes, but is not limited to, the following areas:

- Smith System of Driving-
    - IndyGo employs the five key elements represented within that system.
        - Drive with your hands in the 3 o'clock and 9 o'clock positions.
        - Look at the big picture; use your "eye-lead" time while driving.
        - Check your mirror every 5-10 seconds; move your head from left to right.
        - Maintain a cushion of safety around your vehicle.
        - Always signal your intentions before taking any action.
- Orientation to IndyGo Bus System- This portion is called Behind the Wheel (BTW) or Route Familiarization
- Basic Bus Maneuvers- Perform basic maneuvers on a closed course, which include right turns, left turns, docking into a bus stop/platform, and smooth braking.
- Advanced Bus Maneuvers- driving experience on a public road to condition the operator to make safe defensive decisions while in traffic.
- Servicing stops are practiced while completing the BTW portion of our program. We also provide training with ADA stops that involve using mobility devices.
- System Overview
- System Procedures- IndyGo provides training for all IndyGo procedures from start to finish, which include:
    - Employee conduct and dress code
    - Corporation Policies and FTA Regulations
    - Job processes – Reporting/Relieving, Work Assignments, Human Relations
    - Emergencies

  - Accidents and Reporting

- Communication skills training is conducted during the ADA module. Preferred terms are covered, and items not widely accepted in the Disabled Community are highlighted.
- Customer Service-Human Relations, Professionalism.
- Accessible Service-Mobility Solutions Dept.
- Emergency Management-Emergency Management Steps.
- Fleet Services
- Personal Safety-Safety Barriers, Near-miss Reporting.
- Health/Injury Prevention-Wellness Program, DOT Physical, Fatigue Awareness.
- Stress Management
- De-escalation Training-Self-defense Policy covers this. There is also training in the Human Relations Module that addresses the topic.
- CDL Preparation-Permit Training, CDL Pre-trip, CDL Skills.
- On-route Training-Maintaining a schedule and remaining on-route, detours, tending to passengers, safety while boarding/alighting.
- Vehicle Orientation of all vehicle controls is explained and demonstrated on each type of vehicle used in the fleet.

On-route training provides real service experience with a new Operator Trainee on the Instructor operator's regularly scheduled work. We refer to this as "Cadetting." The Trainee Operator reports for his daily assignment as it is scheduled for the Instructor Operator for that day. The Trainee Operator should be able to perform the regular operator's duties throughout the day. Each day the student receives a full review and debriefing from their instructor. Instructors communicate with the Training Department regarding where additional training for the new operator is required. Student rotation among the operator-instructor group provides each student with experience across various routes, vehicles, times of day, instructional styles, and driving conditions. After the initial training, new Bus Operators receive additional support and training, including:

- Check-rides at intervals during the remainder of their probationary period (6 months).
- Whenever warranted or as deemed necessary.
- Mentorship and Apprenticeship Program - MAP

11.2 De-escalation Training Program Updates:

Regulatory Compliance: To comply with the PTASP Final Rule regarding safety training, the following De-escalation modules have been incorporated into the Agency's training standards. This curriculum addresses conflict recognition, escalation prevention, and safe disengagement strategies.

Implementation Schedule

- **New Employee Training:** Incorporated effective **February 27, 2025**.
    - *Frequency:* Conducted semi-monthly (2x per month) during new operator onboarding.
- **Recurrent (In-Service) Training:** Incorporated effective **June 2, 2025**.
    - *Frequency:* Annual requirement.
    - *Rollout:* Commenced mid-summer 2025; continues until all active personnel complete the cycle.

Target Audience

- Bus Operators
- Supervisors
- Dispatchers
- Customer Service Agents (CSAs)
- Security Personnel

Curriculum & Objectives

The training program utilizes *Rise 360* modules and scripted video scenarios to achieve the following objectives: recognize escalation, apply verbal/non-verbal de-escalation techniques, leverage AVL/camera systems, disengage safely, and document incidents accurately.

New Operator Training (Onboarding)

- *New Operator Training - Transit Conflict De-escalation - Overview* (Rise 360)
- *Emergency Procedures*
- *Accident Reporting & Prevention*

Yearly In-Service Training (Recurrent)

- *Transit Conflict & De-escalation (In-Service)* (Rise 360)
- *Operator Safety Training (In-Service 2025)* (Rise 360)
- *Operator Accident Procedures & Reporting (In-Service 2025)* (Rise 360)
- *Scripted De-escalation Videos* (Presentation)
    - *Note: Includes annual scenario refreshers targeting identified hot-spots.*

Assessment & Safety Assurance

Competency is measured through a combination of knowledge checks and operational performance tracking.

- **Knowledge Verification:**

- **New Operators:** Comprehensive quizzes administered at the conclusion of all training modules.
- **In-Service:** Knowledge checks integrated into both the classroom instruction and the self-guided online portion.

- **Performance Monitoring (Safety Assurance):**
  - Tracking of Operator Assault Rate (per 100k VRM).
  - Analysis of Incident Severity Index.
  - Monitoring of "hot spot" recurrence.
  - Collection of worker feedback regarding training effectiveness.

11.3 System-wide SMS Training

IndyGo has instituted an SMS training plan to meet the requirements of the FTA's Training requirements.

All Key SMS personnel, including Departmental Key SMS personnel, and the Director of Risk and Safety must receive their FTA certifications through TSI according to the requirements above within 3 years from the date of this Plan.

The Accountable Executive will be certified through the FTA-mandated training for that position once the FTA has implemented the requisite training program through TSI.

IndyGo has also implemented an internal SMS training program to educate all employees on their roles in SMS and the requirements of the Safety Plan. This training is tailored to the employees' responsibilities.

This training program will then be ongoing through IndyGo's New Employee Orientation/Training program. All employees will receive training in the Safety Plan and their SMS responsibilities before they begin work at IndyGo.

11.4 Safety-Related Work Training

Under the requirements of MAP-21, FTA has mandated a comprehensive staff training program for operations personnel and personnel directly responsible for safety that includes the completion of a safety training program and continuing safety education and training.

To ensure that all operations and maintenance personnel performing safety-related work are properly trained, qualified, and certified on an ongoing basis as needed, IndyGo has established the following categorized safety-related training programs.

Safety-related work at IndyGo is defined as vehicle operation; maintenance of vehicles, equipment, infrastructure, and facilities; operations and maintenance direct supervision; and operations dispatch.

Table O Safety-Related Work Training Categories

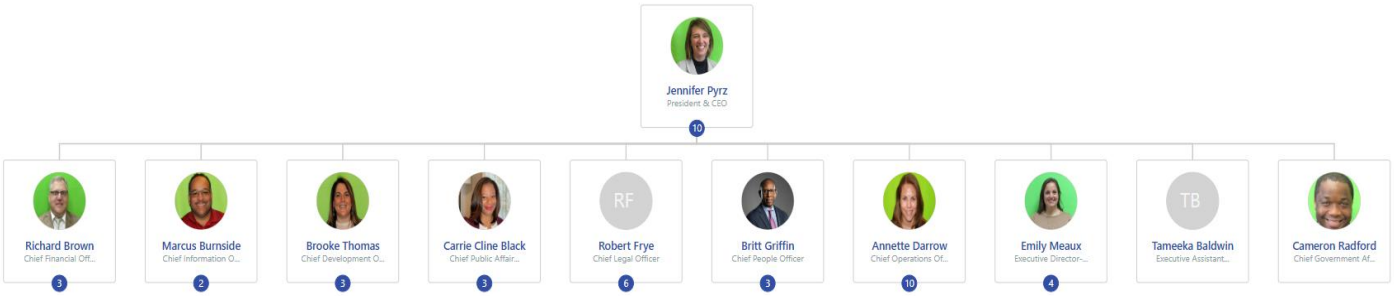
	Operator	Supervisor	Maintenance	Security
Bus Operator Training	✓			
Bus Equipment Maintenance Training			✓	
Electro mechanic Training			✓	
Service Manager Training		✓		
Maintenance Inspection Training			✓	
Post-Accident Retraining	✓			
Operator Extended Absence Training	✓			
Communications/Dispatch Training		✓		
Standard Operating Procedures (SOP) Training	✓	✓	✓	✓

If a contractor or contractor employee is required to work within the IndyGo bus system under operating conditions, training requirements will be spelled out in the contract. IndyGo rules and procedures will be applied without exception to all members of the contractor's workforce affected. Contractors must be instructed on procedures, know the procedures, and follow the procedures. In addition, the contractor must carry a card verifying that the contractor is current with the Roadway Worker Protection training, which is provided to all contractors who have attended the IndyGo course. Roadway Worker Training is required annually for roadway workers and applicable contractors.

Appendices

Appendix A- Organizational Chart

Below is a scaled-back version of the Indianapolis Public Transportation Corporation Organizational Chart showing the CEO and Executive Team. The full version is with the Department of People/Human Resources and is available upon request.



Appendix B- IndyGo System Map