

Washington Metropolitan Area Transit Authority  
**Board Action/Information Summary**

☒ Action ☐ Information

Document  
Number:  
205583

Resolution:  
☒ Yes ☐ No

**Presentation Name:**

Agency Safety Plan (ASP) – Annual Review and Approval

**Project Manager:**

Theresa Impastato

**Project Department:**

Department of Safety

**Purpose/Key Highlights:**

The purpose of the presentation is to obtain Board approval to transmit the ASP to the WMSC for final approval. The ASP is a key component of "Service Excellence" under the Strategic Transformation Plan.

The following key changes were made as part of this year's annual revision to the ASP:

- Incorporates additional safety efforts in accordance with 49 U.S.C. § 5329(d), specifically: establishing a risk reduction program that includes efforts to reduce bus operator accidents and transit worker assaults
- Progress with SMS implementation, including the completion of 2022-2023 milestones, establishment of safety committees and safety risk management process flow, and the launch of the incident management framework
- Incorporates feedback solicited from Metro employees, the Joint Labor and Management Safety Committee (JLMSC), Executive Safety Committee (ESC), Federal Transit Administration (FTA), Washington Metrorail Safety Commission (WMSC), and Senior Executive Team (SET)

**Interested Parties:**

None

**Background:**

In 2016, the Federal Transit Administration (FTA) published 49 CFR Part 670 Public Transportation Safety Program, which states *“The FTA has adopted the principles and methods of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation in the United States”* (49 C.F.R. § 670.3). SMS is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry’s existing safety foundation to continuously improve how safety risks are identified and assessed with mitigating actions taken before an accident or incident occurs.

In July 2018, the FTA published 49 CFR Part 673 Public Transportation Agency Safety Plan. Transit operators that receive federal funds (under the FTA’s Urbanized Area Formula Grants) are required to develop ASPs that specify how SMS will be implemented over the course of a multi-year period. Metro’s previous three (3) annual ASPs were approved by the SET, Board of Directors, Washington Metrorail Safety Commission, and self-certified with the FTA.

## **Discussion:**

The Department of Safety’s vision is for Metro to become the transit industry leader in safety. Metro’s mission is to realize this vision by developing and implementing a world-class Safety Management System (SMS). Metro’s SMS roadmap establishes the priorities for accomplishing the mission. These SMS priorities are aligned to and in support of the strategic transformation plan. Metro’s ASP describes how the mission will be implemented. There are four components to SMS: Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion. The ASP is refreshed annually to reflect the progress made, incorporate lessons learned, and outline the path forward.

Key changes to the ASP include: establishing a risk reduction program, which includes efforts to reduce bus operator accidents and transit worker assaults; progress with SMS implementation, including the completion of 2023 milestones, establishment of safety committees and safety risk management process flow, and the launch of the incident management framework; and incorporating feedback from a variety of sources including Metro employees, SET, JLMSC, ESC, WMSC, and FTA. To instill an Authority-wide sense of ownership of the ASP, a dedicated website was created for employees to access ASP information and insert changes directly into an editable version of the document (with track changes on) or submit feedback forms if preferred. The Department of Safety partners with Customer Service, Communications, and Marketing to actively promote the website and ASP through promotional campaigns, podcasts, email, and other forms of communication.

Additionally, the JLMSC reviews and approves the ASP. Each year, Metro has also taken advantage of the courtesy reviews of the ASP offered by FTA’s Technical Assistance Center (TAC) and incorporated feedback. Feedback from Metro’s senior executive team was also incorporated.

The WMSC is required to approve the ASP. The Chief Executive Officer of WMSC

provides Metro's General Manager/Chief Executive Officer with 'conditional approval' through email, meaning WMSC staff concurs with the updated ASP. Once conditional approval is achieved at the WMSC staff level, the WMSC Board considers the ASP for final approval, which is scheduled to occur in October 2023 following approval by Metro's SET and Board of Directors.

**Funding Impact:**

Development and implementation of SMS is accounted for in the budget and within Metro's strategic transformation plan. This presentation is a report on the progress being made in accordance with the ASP.

**Previous Actions:**

As documented in the ASP.

**Next Steps:**

Implementation of the SMS throughout Metro is planned as a multi-year process. No change to the timeline is proposed.

**Recommendation:**

Approval to: Recommend the Board approve the annual update to the ASP.

**PRESENTED AND ADOPTED: September 28, 2023**

SUBJECT: APPROVAL OF THE 2024 PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

**2023-29**

RESOLUTION  
OF THE  
BOARD OF DIRECTORS  
OF THE  
WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

WHEREAS, The laws of the U.S. Department of Transportation codified at 49 U.S.C. Section 5329(d) and Federal Transit Administration (FTA) regulation 49 C.F.R. Section 673.11(a)(1) require the Board of Directors to approve WMATA's Public Transportation Agency Safety Plan (PTASP) and any updates to the PTASP; and

WHEREAS, In accordance with FTA regulation 49 C.F.R. Section 673.11(a)(5), WMATA staff has conducted an annual review and update of the PTASP (Attachment A); and

WHEREAS, In accordance with the Washington Metrorail Safety Commission (WMSC) Program Standard, effective September 10, 2023, WMSC staff has reviewed and approved the updated PTASP; and

WHEREAS, In accordance with 49 U.S.C. Section 5329(d), the Joint Labor and Management Safety Committee (JLMSC) has reviewed and approved the updated PTASP; and

WHEREAS, The General Manager and Chief Executive Officer has signed the PTASP and certified to the Board of Directors that the PTASP is satisfactory and complies with each of the requirements of the PTASP rule (49 C.F.R. Part 673), and that the PTASP will effectively guide WMATA with the management of safety risks;

NOW, THEREFORE, be it

*RESOLVED*, That the Board of Directors approves the 2024 Public Transportation Agency Safety Plan, as shown in Attachment A; and be it finally

**Motioned by Mr. Drummer, seconded by Dr. Hadden Loh**

**Ayes: 8- Mr. Smedberg, Mr. McAndrew, Dr. Hadden Loh, Ms. Kline, Mr. Letourneau, Mr. Drummer, Ms. Worth and Ms. Helfer**

*RESOLVED*, That this Resolution shall be effective 30 days after adoption in accordance with Compact Section 8(b).

Reviewed as to form and legal sufficiency,



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Patricia Y. Lee  
Executive Vice President, Chief Legal Officer  
and General Counsel

WMATA File Structure No.:  
22.6.1 – Federal Transit Administration (FTA) Safety Oversight

# Public Transportation Agency Safety Plan



DOCUMENT NUMBER:

4100-1-01/04

VERSION

4.0

RELEASE DATE:

December 31, 2023

CONTENT OWNER:

Department of Safety  
Washington Metropolitan Area Transit Authority  
300 7<sup>th</sup> St., SW Washington, DC 20024



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**Concurrences and Approvals**  
**WMATA Public Transportation Agency Safety Plan**  
4100-1-01/04

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Theresa M. Impastato  
Executive Vice President &  
Chief Safety and Readiness Officer

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Brian P. Dwyer  
Executive Vice President &  
Chief Operations Officer

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Sherri Dickerson  
Executive Vice President &  
Chief People Officer

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Yetunde Olumide  
Executive Vice President &  
Chief Financial Officer

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Thomas Webster  
Executive Vice President &  
Chief Planning and Performance  
Officer

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Sarah Meyer  
Executive Vice President &  
Chief Experience and Engagement  
Officer

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Judd L. Nicholson  
Executive Vice President &  
Chief Digital Officer

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Andrew B. Off  
Executive Vice President &  
Chief Infrastructure Officer

Provided in Appendix F

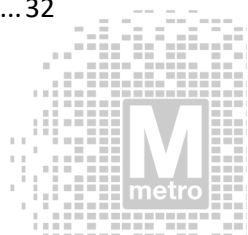
Randy S. Clarke  
General Manager &  
Chief Executive Officer





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## Safety Management Policy Letter

Dear Colleagues,

Metro's mission is to move the region through safe, equitable, reliable, and cost-effective public transportation. At Metro, safety is a core value and to accomplish our mission we are committed to fostering a culture of safety and implementing an industry-leading Safety Management System (SMS) to proactively manage and mitigate our safety risks.

By embracing the SMS and actively participating in its implementation, we can collectively work towards our goal of achieving and maintaining the highest standards of safety at Metro. Our commitment to safety is unwavering, and we are confident that by working together we can create a safe transit system for our passengers and a safe working environment for our employees.

To continue advancing safety throughout Metro, we reaffirm our commitment to the four key principles of our Safety Management Policy, which defines what being safe at Metro really means to us.

- 1) We **understand our top safety risks**, what is being done about them, and how well it's working.
- 2) We take **proactive** action to reduce safety risks and **prevent** incidents from occurring.
- 3) We **apply lessons learned** from our performance and make continuous safety improvements.
- 4) We are **encouraged and empowered to voice safety concerns** across all levels of the organization using Metro's safety reporting programs, without fear of reprisal.

By living these principles, we help keep our customers, each other, and our assets free from harm and deliver on our promise to provide the region with safe, equitable, reliable, and cost-effective public transportation. Thank you for your ongoing commitment to safety and for your vital contributions to our Safety Management System.

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Theresa M. Impastato

Executive Vice President &  
Chief Safety and Readiness  
Officer

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Brian P. Dwyer

Executive Vice President &  
Chief Operations Officer

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Andrew B. Off

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Chief People Officer

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Randy S. Clarke

General Manager &  
Chief Executive Officer

## 1.0 General Requirements

The Federal Transit Administration's (FTA's) 49 CFR Part 673 *Public Transportation Agency Safety Plan*, Subpart C *Safety Management Systems* provides the minimum requirements for development of a Safety Management System (SMS). In addition, 49 CFR Part 674 *State Safety Oversight* and the Washington Metrorail Safety Commission's (WMSC) Program Standard provides specific requirements to which the Washington Metropolitan Area Transit Authority (hereafter Metro) Metrorail is required to comply. WMATA's Agency Safety Plan (ASP) addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan (§ 673.11(a)(4)). The general requirements reflected in this section include: providing specific Transit Agency Information; the timeline associated with Agency Safety Plan (ASP) development, updates, and approvals; reference to the planning associated with emergency preparedness and response; specific safety performance targets; and an overview of the SMS Strategic Roadmap.

This document is a plan, which, by definition, is aspirational in parts as Metro moves towards full implementation of its SMS.

### 1.1 Transit Agency Information

<b>Transit Agency Name</b>	Washington Metropolitan Area Transit Authority (WMATA)		
<b>Transit Agency Address</b>	300 7 <sup>th</sup> Street, SW Washington, DC 20024		
<b>Name and Title of Accountable Executive</b>	Randy S. Clarke		
<b>Name and Title of Chief Safety &amp; Readiness Officer</b>	Theresa M. Impastato		
<b>Authority for State Safety Oversight Program</b>	Washington Metrorail Safety Commission		
<b>Mode(s) of Service Covered by This Plan</b>	Rail, Bus, and Paratransit	<b>List All FTA Funding Types (e.g., 5307, 5337, 5339)</b>	5307, 5340, 5337, 5339, 5310, 117-58
<b>Mode(s) of Service Provided by the Transit Agency</b>	Directly operated: Rail and Bus Contracted service: Paratransit (automobile)		

The General Manager and Chief Executive Officer (GM/CEO) is ultimately accountable for ensuring that Metro's SMS is implemented throughout the Metro system in accordance with this ASP. Additionally, the GM/CEO is accountable for ensuring action is taken to address substandard performance in Metro's SMS when required. The Executive Vice President (EVP) and Chief Safety & Readiness Officer (EVP/CSRO) has been designated by and reports to the GM/CEO. The EVP/CSRO is a safety professional that has been adequately trained, holding both the U.S. Department of Transportation (DOT) Transit Safety and Security Program (TSSP) and Public Transportation Safety Certification Training Program (PTSCTP) certificates (among other credentials). The EVP/CSRO has been empowered with the

responsibility for day-to-day implementation and operation of Metro’s SMS. The EVP/CSRO does not serve in any other operational or maintenance capacities.

## 1.2 Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Theresa M. Impastato, Executive Vice President and Chief Safety and Readiness Officer	
Approval by Joint Labor and Management Safety Committee (JLMSC)	Voting Record	Date of Approval
	Refer to Appendix E – JLMSC ASP Approval Record	8/29/2023
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
	Refer to Appendix F – Public Transportation Agency Safety Plan (PTASP) General Manager Certification	TBD
Approval by the Board of Directors or an Equivalent Authority	<b>Name of Individual/Entity That Approved This Plan</b>	Date of Approval
	Board of Director’s Resolution – TBD	TBD
	Relevant Documentation (Title and Location)	
	Refer to Appendix G – WMATA Board Resolution Record	
Certification of Compliance	<b>Name of Individual/Entity That Certified This Plan</b>	Date of Certification
	Washington Metrorail Safety Commission	TBD
	Relevant Documentation (Title and Location)	
	Refer to Appendix H – PTASP SSOA Certification	

The timeline of the Annual Review and Update cycle of the Agency Safety Plan is presented below.

Timeline	Activity	Description
January 1 to December 31	ASP available on Metro’s intranet for comment.	The Director of Safety Policy and Promotion ensures the document is posted, the comment form is available, and ensures the opportunity to review and provide feedback is promoted. All comments are logged on the Department of Safety’s SharePoint site.
May 1-30	Conduct ASP General Review	The Director of Safety Policy and Promotion performs an inventory of inputs (comments received, investigations, policy changes, Corrective Action Plans (CAPs), risk mitigations, Safety Committees, Safety Risk Coordinators (SRCs), etc. to ensure interconnected policies and procedures, etc., that may be affected are addressed.
June 1-30	Prepare ASP Draft; Initiate WMSC Review	The Director of Safety Policy and Promotion drafts the revision of the ASP and initiates review with WMSC Staff to obtain “Conditional Approval”.

July 1-31	WMATA-Wide Comment Period; Finalize ASP Revision	The draft ASP revision is posted on the Metro intranet for all employees to review and comment.  The Director of Safety Policy and Promotion conducts a final review to ensure all feedback has been addressed. Conditional approval from the WMSC is secured at the end of this review period and no further material changes are made
August 1-31	JLMSC Approval; Executive Safety Committee (ESC) Review and Approval	The JLMSC reviews and approves the ASP. The ESC reviews and approves the ASP.
September 1-30	WMSC/Metro review period	The GM/CEO then approves the ASP, and it is submitted to the Board for review and approval.
October 1 to December 31	WMSC Board Approval	After securing approval from Metro's Board. The ASP is submitted to the WMSC for approval.
	ASP Revision Published	The Safety Promotion Manager distributes and promotes the latest ASP and ensures SMS training, New Employee Orientation, etc. are updated.

The Director of Safety Policy and Promotion ensures that the Funds and Grants office has a copy of the approved ASP to support the FTA's tri-annual reviews and the annual certification and assurances process.

Should changes occur that affect the roles and responsibilities described in this ASP, any changes will be communicated to the agency through an administrative notice, which will also be shared with the WMSC and other stakeholders. Assigned roles and responsibilities in the ASP will remain as stated, until the ASP annual review cycle runs its course. All applicable changes will be incorporated in the next annual review process and approved by the JLMSC, ESC, GM & CEO, and the Metro Board.

The full history of changes for each version of this ASP is available in Appendix I – ASP Revision History.

### 1.3 Emergency Preparedness and Response Plan

The Office of Emergency Preparedness (OEP) is part of the Department of Safety, reporting to the Senior Vice President (SVP)/Assistant Chief Safety Officer (SVP/ACSO). The department develops, maintains, and takes the lead in implementing emergency management documentation as required by 49 CFR § 673.11(a)(6), hereby incorporated by reference as recommended by FTA.

The Emergency Operations Plan (EOP) serves as Metro's Emergency Preparedness and Response Plan. The EOP provides an overall framework for emergency operations for Metro's role in supporting incident or event operations throughout its service area in the National Capital Region. The EOP assigns roles and responsibilities to departments across the Authority and individuals for their preparedness prior to, and their implementation during, an incident or event. Metro Transit Police Department (MTPD) General Orders provide additional guidance for MTPD operations. Additionally, the EOP identifies employee responsibilities during an emergency and provides detail on the coordination with federal, state, regional, and local officials with roles and responsibilities for emergency preparedness and response in Metro's service area.

The documentation listed below specifies agency-wide plans, programs, and processes to manage the public safety and emergency management functions:

- EOP
- Continuity of Operations Plan
- Flood Emergency Response Plan
- Severe Weather Plan
- Family Assistance Plan
- Station Emergency Response and Evacuation Plan
- 49 C.F.R. Part 1520 – Protection of Sensitive Security Information
- 49 CFR § 1570.203 – Reporting Significant Security Concerns
- Standard Operating Procedures, and other departmental safety-critical documentation of daily tasks and activities

Jurisdictional agreements, including Memoranda of Agreement/Understanding (MOA/MOU), are also maintained by OEP. Corrective actions resulting from lessons learned, exercises, and related Emergency Preparedness activities are the responsibility of OEP in coordination with the other Metro departments.

### 1.3.1 Infectious Disease Mitigation

In accordance with the requirements introduced by the Infrastructure Investment and Jobs Act (IIJA) OEP maintains a dedicated Pandemic Response Plan. This plan meets the requirements of 49 U.S.C. § 5329(d)(1)(D) by outlining the strategies being implemented to minimize the risk of infectious disease exposure for the public, personnel, and property. WMATA's Pandemic Response Plan is consistent with guidelines of the Centers for Disease Control and Prevention and the State health authority to minimize exposure to infectious diseases. The Pandemic Response Plan will continuously improve based on the lessons learned from the COVID-19 pandemic.

## 1.4 Safety Performance Targets

In coordination with the Department of Safety and the Office of Transit Performance Management (hereafter Performance), departments establish internal safety performance targets, which feed into the overall targets established for Metro. The targets are developed in alignment with the safety performance measures established by the FTA's National Public Transportation Safety Plan, specifically:

- **Fatalities:** Total number of fatalities (deaths confirmed within 30 days) reported to the National Transit Database (NTD), excluding trespassing and suicide-related fatalities. The rate is calculated per total Vehicle Revenue Miles (VRM) by mode.
- **Injuries:** Total number of customer and employee injuries reported to the NTD, excluding injuries resulting from personal security events, such as assaults. This includes both major (an NTD reportable criteria has been met, such as damage above \$25,000) and minor (all others involving transport away from the scene due to injury, such as a slip/trip/fall on an escalator) events. The rate is calculated per total VRM by mode.
- **Safety Events:** Total number of safety events (excluding personal security events) that meet the NTD reporting threshold. Rate is calculated per total VRM by mode.
- **Assaults:** In accordance with the requirements introduced by the IIJA (49 U.S.C. § 5329(d)(1)(I)), assaults upon an operator or other transit employee that meet the NTD reporting threshold has been incorporated. Rate is calculated per total VRM by mode.
- **System Reliability:** Mean distance between major mechanical failures by mode. The NTD defines a major mechanical system failure as a failure of some mechanical element of the

revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or starting the next scheduled revenue trip because vehicle movement is limited or due to safety concerns. For Rail, all mechanical failures are included in the measure.

#### 1.4.1 Safety Performance Target Setting Methodology and Timeline

Safety performance targets are set in alignment with FTA’s guidance as specified in the National Transportation Safety Plan. The approach used this year was adjusted to account for the dynamic realities experienced before, during, and after the COVID-19 pandemic. Historically, targets were established on a year-over-year basis. However, performance baselines have been established for each target, which is informed by Metro’s performance over the past 12-to-36 months. This context most closely aligns with expected performance over the coming year.

The Departments of Safety and Planning & Performance subsequently work with Metro leadership to develop target recommendations, factoring in previous performance, the strategic priorities for FY2024, external trends, and available resources. For measures where data was available, comparable performance information is collected from peer transit agencies to provide additional context. All safety targets aim to continue to improve performance relative to current or historical levels.

Safety Performance Target Setting Timeline	
Action	Date
Performance coordinates with Department of Safety to draft the safety performance targets for the following fiscal year	April
Metrorail, Metrobus, and MetroAccess review, finalize, and approve target proposals. JLMSC and ESC reviews and approves the safety performance targets	May
WMSC reviews as part of annual ASP submission	June
The Transportation Planning Board at the Metropolitan Washington Council of Governments (MWCOC) reviews and provides concurrence.	Transmitted July

Following submission by Metro, MWCOC coordinates the safety performance targets with the jurisdictional partners (Virginia, Maryland, and Washington, D.C.). Metro will coordinate, to the maximum extent practicable, with the State and MPO to support the selection of state and MWCOC on transit safety performance targets.

#### 1.4.2 Safety Performance Targets

Metro's safety performance targets are established based on incident rates and, where applicable, converted to counts based on anticipated vehicle revenue miles. The ongoing implementation of the strategy outlined in this ASP reflects Metro's commitment to exceed these targets and continuously improve safety outcomes. The ultimate goal is a Metro experience free from harm for employees and customers, with zero fatalities. To help achieve this, Metro aims to create an environment that consistently yields positive outcomes, reducing safety events and injuries.



Category	Metric	Bus Target	Rail Target	MetroAccess Target
Fatalities	Fatalities	0	0	0
Injuries	Customer Injury Rate*	49.8	11.5	13.2
	Employee Injury Rate*	16.6	6.8	7.0
	Overall Injury Rate* Combined	66.4	18.3	20.2
	Overall Injury Count	250	146	38
	Targeted performance improvement percentage**	5.8%	12%	6%
Safety Events	Safety Event Rate*	44.6	5.2	29.3
	Safety Event Count	168	41	56
	Targeted performance improvement percentage**	3.5%	14.7%	14.5%
Assaults	Assault Rate*	11.7	7.5	0
	Assault Count	44	60	0
	Targeted performance improvement percentage**	17.6%	9.6%	N/A

\*per 10 million vehicle revenue miles

\*\*targeting performance improvement percentage is calculated based on FY2023 performance (YtD); however, targets are based on improvements over baseline, explaining the variance in percentage numbers.

### 1.4.3 System Reliability Targets

Maintaining the system in a State of Good Repair is the foundation for Metro to produce consistent, repeatable outcomes that create an environment conducive to a safe experience. Target setting has continuously improved in this area with the calculations based on mean distance between failure standardized across all three modes. MetroAccess is expecting to release new vehicles from the fleet into service, which is temporarily expected to decrease the mean distance between failure, explaining the improvement from current performance.

Metric	Bus Target	Rail Target	MetroAccess Target
System Reliability (Mean Distance Between Failure)	8,000	25,000	22,000
Targeted performance improvement percentage	2.8%	1.3%	-16%

## 1.5 Risk Reduction Program

As Metro is a large, urbanized agency that receives Section 5307 funding, it has developed a risk reduction program to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers. The majority of these efforts are detailed in sections 3.0 and 4.0, including the investment in SRCs, the establishment of Safety Committees, and improvements in safety data and performance monitoring. Specific efforts on two high-priority areas are detailed below.

### 1.5.1 Visibility for Bus Operators

Metro is actively working to reduce the number of vehicular and pedestrian accidents involving buses, specifically focusing on measures to reduce visibility impairments for bus operators.

1. **Collision Avoidance System:** Metro is reviewing the feasibility of a collision avoidance system that may be retrofitted into parts of the bus fleet. This system aims to reduce accidents by providing advanced warning and assistance to bus operators in situations where collisions with pedestrians or objects are likely to occur.
2. **Relocation of Transit Control Head:** The device that provides real-time performance information to bus drivers is being relocated to a position that eliminates the need for operators to look over their shoulders. By placing the Transit Control Head in a more convenient and ergonomically suitable location, Metro aims to enhance visibility and reduce the chances of accidents.

### 1.5.2 Transit Worker Assaults

Metro believes that any physical or verbal assault is one too many and has developed mitigation plans in an effort to reduce these incidents, listed in the table below. The Department of Safety's Safety Assurance team monitors effectiveness of these mitigation plans through metrics and detailed analysis. At the start of fiscal year 2023, Metro introduced a new metric to monitor assaults, namely the number of NTD reportable assaults per 10 million vehicle revenue miles. These trends and the associated mitigation plans are shared monthly in various forums, such as MetroSTAT, RailSTAT, BusSTAT, the ESC and the JLMSC.

Mitigation	Description
Bus shields	Bus shields, a physical barrier between the Bus Operator and potential assailants, have been installed on all Metro buses. While the impact of bus shields is difficult to measure quantitatively, their efficacy has been demonstrated through experience and the evaluation of reports. They have proven instrumental in safeguarding bus operators by reducing the number and severity of assaults.
De-escalation training	Metro provides <i>De-Escalation and Stress Management Training</i> to bus operators, station managers, and other employees who regularly engage with customers. This program is designed to equip participants with essential skills to effectively manage their mindset, enhance awareness, improve communication abilities, de-escalate challenging situations, and foster personal resilience. By focusing on these critical areas, the training empowers employees to navigate potentially tense interactions with customers, promoting a safer and more secure environment for all parties involved.
Closed-Circuit Television (CCTV)	Metro has a robust CCTV system across its network, aiming to deter incidents and facilitate the resolution of assaults involving customers and employees. The installation and ongoing maintenance of this system are prioritized to ensure its effectiveness. All Buses are equipped with audio and video recording capabilities, and to further deter unwanted behaviors, most are equipped with monitors that make patrons aware of being under surveillance. The 7000-series cars, and all future trains will have video surveillance in each car. Furthermore, the stations and facilities are monitored by over 8,000 cameras, with recorded footage serving as valuable evidence for investigators.
Community outreach	Metro remains committed to actively engaging with the community and providing ongoing outreach and education regarding fare policy and policing. Since 2022, MTPD has engaged in a comprehensive re-education program that involved the distribution of informative pamphlets on fare enforcement, an extensive media campaign and an

	increased presence of MTPD personnel near fare gates, among other activities. The adherence to fare policies creates an environment of shared responsibility and improved overall compliance within the transit system.
Increased penalty for assaulting operators	Metro has established a valuable partnership with DC and Prince George's Crime Solvers, permitting MTPD to access the assistance of Crime Solvers to offer rewards, with a potential value of up to \$1,000, for information that leads to the arrest of individuals responsible for assaulting Metro employees. To raise awareness and encourage community involvement, Crime Solvers flyers have been distributed throughout the transit system.
Targeted inspections, Increased presence, Helping Hands	Metro has taken proactive measures to enhance visibility and presence in high crime stations and bus routes by targeted deployment of uniformed and plainclothes officers through a program called "Helping Hands." Officers contact employees in the field to check on their welfare and observe buses, train cars and stations. In addition, the MTPD has strategically stationed the Special Response Team in a manner that allows for a faster response to emergency incidents that may involve an active threat.
Centralizing command centers	The planned consolidation of the Rail, Bus and Security Operations Control Centers will help promote reliable and efficient communications with front-line employees, including timely responses to incidents.
Policing Differently: Your Metro	The MTPD operates under the guiding philosophy of Problem-Oriented Policing, utilizing the SARA Model (Scanning, Analysis, Response, Assessment) to address various areas and activities within the transit system. Through this problem-solving approach, MTPD has identified specific issues and developed targeted projects to address them. Some of these projects have achieved their goals and have been successfully closed, while others remain ongoing as part of the continuous improvement process. All MTPD members and officials have undergone comprehensive SARA training, underscoring the significance of this approach as one of the core principles driving the MTPD's operations.
Crisis Intervention Specialists	MTPD Crisis Intervention Specialists are Crisis Intervention Team-trained civilians who work to provide support and guidance to individuals who may be experiencing crisis in WMATA's system. They often work alongside MTPD in a co-responder role when necessary and are under the supervision of a Lieutenant and Sergeant while on duty. Their responsibilities include assessment of the nature and extent of the crisis to decide the best course of action, immediate intervention to provide short-term assistance, referral to other services for long-term support, and short-term follow up to ensure the individual is making use of the resources and to assess if additional help is needed.
Partnerships with other Police Departments	MTPD has strong partnerships with our jurisdictional law enforcement partners. The MTPD attends regular jurisdictional law enforcement meetings pertaining to intelligence, events and strategies. The MTPD is also on a variety of committees hosted by the Council of Governments. The MTPD has entered into Memoranda of Agreement with several jurisdictional police agencies to provide their officers to patrol metro stations during morning and evening rush hours, as their staffing allows.

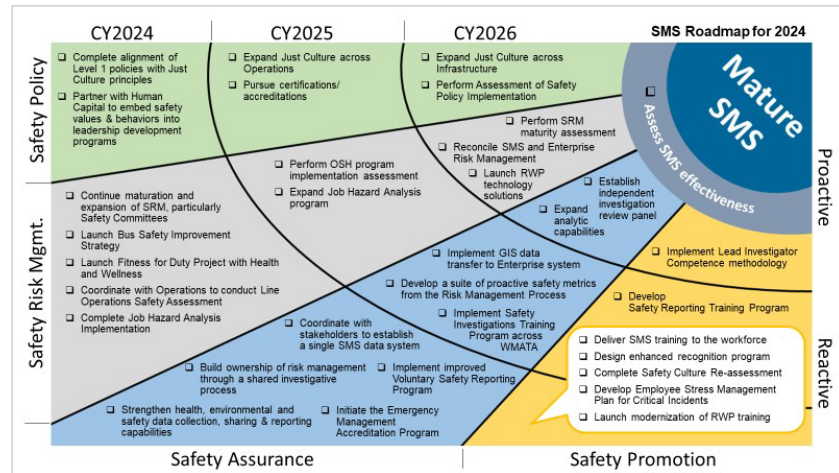
## Environmental design

Metro utilizes best practices in design in the built and natural environment to prevent crime. Notably, through SARA projects, significant improvements have been made to enhance safety. This includes the augmentation of lighting at L'Enfant Plaza, the installation of light towers at various stations such as Fort Totten and College Park, and the utilization of visual message boards. Additionally, Metro has been actively engaged in the redesign of fare gates, strategically placing live monitors, and incorporating innovative measures to promote security and deter criminal activity.

## 1.6 Development and Implementation of a Safety Management System

Establishing and implementing a robust SMS that is appropriately scaled to the size, scope, and complexity of Metro requires a strategic, deliberate multi-year effort. Therefore, the Department of Safety has established an SMS Strategic Roadmap (see Appendix A – SMS Strategic Roadmap) that reflects the key priorities and milestones that will be accomplished to

establish the SMS. The roadmap is organized in accordance with the four components of SMS: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion, against a multi-year timeline. Each lane of the roadmap is addressed in more detail throughout this ASP.



## 2.0 Safety Management Policy

The Safety Management Policy component of Metro's SMS has been designed to meet the requirements established by the FTA and the WMSC, as applicable. In accordance with 49 CFR Part 673.23 *Safety Management Policy* and WMSC's Program Standard, this section of the ASP includes:

- 2.1 Safety Management Policy
- 2.2 Employee Safety Reporting Program
- 2.3 Communication of the Safety Management Policy
- 2.4 Necessary Authorities, Accountabilities, and Responsibilities

In 2023, the final step in the re-organization of the Department of Safety around the components of SMS was completed. The job description and required funding for the positions of Director of Safety Policy & Promotion and a Program Manager of Standards and Evaluation were secured and the positions recruited. These two roles will oversee the activities captured in this section and section 5.0 Safety Promotion.

Additionally, the Safety Policy segment of the SMS Strategic Roadmap includes key programmatic milestones that have been prioritized to advance SMS development and implementation:

- Complete alignment of Level 1 policies with Just Culture principles

- Partner with Human Capital to embed safety values & behaviors into leadership development programs

The objective of the project *Complete alignment of Level 1 policies with Just Culture principles* is to ensure that the highest-level documents for Metro are fully aligned with the principles of Just Culture, which are to be formally defined and codified. The project aims to create a fair and balanced approach to accountability, with a focus on fostering a safety-oriented culture. Key activities include a comprehensive review of existing policies, identifying gaps and areas for improvement, and making necessary revisions to align with Just Culture principles. The project will involve collaboration with stakeholders from various levels of the organization, including safety committees, departmental leadership, and employees, to help ensure a thorough and effective alignment process.

The Department of Human Capital has led a multi-year project to revise job competencies, job families and career paths. In 2024, the Department of Safety and Readiness, including the Departments of Safety and Technical Training will collaborate with Human Capital to embed safety values and behaviors into Metro's leadership development programs. The project recognizes the critical role that leaders and key position holders play in promoting a strong safety culture across the organization. Key activities include working closely with the Human Capital team to identify opportunities to incorporate safety-related training, discussions, and simulations into existing leadership development programs. The project will involve developing and delivering tailored training modules that emphasize the importance of effective safety communication and decision-making for safety in leadership roles.

## 2.1 Safety Management Policy Statement

In accordance with the safety management philosophy and approach, one of the GM/CEO's main responsibilities is to build and maintain an industry-leading safety culture and SMS in accordance with the FTA's adoption of the SMS approach in its National Public Transportation Safety Plan. This ASP establishes Metro's FTA-compliant SMS as the primary strategy to achieve this goal. This Policy Statement also certifies that the ASP is compliant with 49 CFR Part 673 *Public Transportation Agency Safety Plan*, 49 CFR Part 674 *State Safety Oversight* and the WMSC's Program Standard.

Safety management is a core value at Metro. All employees are accountable for appropriately identifying and effectively managing risk in all activities and operations to deliver continuous safety improvement and reduce safety risks as low as reasonably practicable, starting with the GM/CEO.

In accordance with the FTA's National Public Transportation Safety Plan, and 49 CFR 673.23(a), Metro's safety objectives are:

- Support the management of safety through the provision of appropriate and sufficient resources to reduce risks to as low as reasonably practicable and to achieve an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication and actively prioritizes the management of risk
- Define for all staff, including executive management, middle management and front-line employees alike, their responsibilities for the delivery of the organization's safety performance
- Establish and operate effective safety risk identification, assessment, and mitigation activities based on SMS safety risk management principles, including an employee safety reporting program that provides a fundamental source for safety concerns and hazard identification, in order to proactively mitigate safety risks
- Ensure that no action will be taken against any employee who discloses a safety concern unless disclosure indicates an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures

- Comply with, and wherever possible exceed, legislative and regulatory requirements and standards
- Ensure that skilled and trained human resources are available to implement SMS processes
- Ensure that communications and training result in employees knowing their role within SMS and how to implement the associated processes and tools that are commensurate with their skillset to drive its effectiveness
- Establish safety performance targets and measure against data-driven safety performance indicators
- Continually improve our safety performance through management processes that ensure that appropriate mitigating action is taken and effective
- Ensure the services and products provided in support of Metro's operations are implemented in compliance with SMS as specified in this ASP; this policy will be visibly communicated through my own direct efforts, the efforts of the senior executive team, senior management team, and through training programs and procedures

I affirm this commitment:

---

Randy S. Clarke,  
General Manager and Chief  
Executive Officer  
Accountable Executive

---

Date

## 2.2 Employee Safety Reporting Program

Metro has multiple avenues by which employees and contractors can report safety concerns, risks, and hazards. All hazard reports are properly documented by the receiving party, no matter the source. Investigations of hazards are properly documented per Policy Instruction (P/I) 10.4 *Incident and Accident Investigation* and distributed according to that P/I and supporting procedures.

Metro's SMS requires all employees and contractors to identify hazards, mitigate them immediately if possible, and to report them. This includes reporting a Close Call when involved directly or witnessing a near-miss incident, or if a reported safety concern persists. Metro strives for a culture where employees and contractors feel comfortable verbally reporting their safety concerns to their direct supervisor, senior management, SRC, or Department of Safety personnel as soon as they are discovered. However, there may be circumstances where employees and contractors prefer reporting outside their chain of command to maintain confidentiality or anonymity, and out of concern for retaliation. Metro's Safety Management Policy specifically prohibits retaliation, but the concern may still exist. Consequently, the following reporting methods are available:

- Metro Hazard Submission Form, which sends the report directly to their department's SRC for response and action. Upon receipt, the SRC follows their departmental Safety Risk Management Process to identify the Safety Risk and to develop Integrated Risk Mitigation Plans to appropriately mitigate the Safety Risk as low as reasonably practicable. This process is documented in Origami, Metro's Safety Risk Management Software, to track, monitor, and report out on the response.
- Employees may report any perceived safety issue or hazard to a Facility Safety Committee (FSC) or Department Safety Committee (DSC) member. It is then routed to the Department's SRC to



follow the departmental Safety Risk Management Process. FSCs document Facility-based hazards on a Hazard Log, where they are managed, and tracked to completion. Department-wide issues or hazards are escalated to the DSC, which are documented in Origami, and tracked to completion.

- The Safety Hotline is available for reporting safety concerns 24 hours a day, 7 days a week. Reports can be made by calling 202-249-SAFE (7233) or by accessing the online form on the Department of Safety's page on Metro's intranet (Refer to SOP 4132-3-01 *Safety Risk Reporting Process* for more information). Once reported to the Safety Hotline, a Safety Specialist or appropriate Manager is assigned to investigate the reported issue(s) and coordinate with the responsible departmental SRC to implement mitigations, which are then documented in Metro's Safety Measurement System. The employee will have the option of speaking to a Safety Specialist at any time while maintaining their confidentiality. As the Safety Risk Management implementation matures, SRCs and Safety Specialist will develop capabilities to follow up with the employee on the status of implementation, if contact information is provided.
- Safety concerns received by the Office of Customer Service, Communications & Marketing (CSCM) directly or through social media are reviewed by a Safety Specialist and entered into the Safety Hotline as appropriate and then managed as described above. Actions taken are reported to CSCM for response to customers.
- The Office of Inspector General (OIG) may forward safety concerns to the Department of Safety. If anonymity has been requested, this will be maintained by OIG and the Department of Safety. A Safety Specialist will review the concern and coordinate with the responsible departmental SRC to implement mitigations. If an investigation is required (either deemed required by the Department of Safety or requested by the OIG), the resulting iCAPAs will be coordinated with the responsible departmental SRC for action. These iCAPAs are then documented by the Department of Safety along with all other RCAs in Metro's Safety Measurement System with the results reported back to the OIG.

Metro became the first transit agency to launch a Confidential Close Call Reporting Program (C3RP) in July 2013. The Close Call Program builds upon the other initiatives Metro has put in place to encourage employees to report safety concerns. The Close Call Program allows Metro to gather information about unsafe conditions and near misses, investigate potential hazards and act to prevent more serious safety incidents, address practical drift, or identify and monitor emerging trends.

Close Call Program is available 24 hours a day, 7 days a week. Employees shall report a close call when they are involved directly or witness a near-miss incident, or if a reported safety concern persists. Under the program, the employee reports their safety concern to a third-party data broker. The reporting employee's information is kept confidential with the federal law Confidential Information Protection and Statistical Efficiency Act (CIPSEA), and Metro management does not receive any identifying information from the third-party.

Employee behaviors that do not qualify for protection from discipline under the Close Call Program are detailed in the program Memorandum of Understanding for the Confidential Close Call Transit Safety Reporting System for the Washington Metropolitan Area Transit Authority.

If an employee feels that retaliation has taken place as a result of reporting a safety concern, they are encouraged to work with their labor representatives (if represented) or Human Capital (if non-represented). Policies related to employee conduct have been established to ensure a fair and consistent review that reflects Metro's commitment to protect employees from retaliation.

The Department of Safety responds to the safety-related reports received and shares outcomes directly with employees and contractors, through employee communications (such as articles in *MetroVoices Wire* Newsletter, Safety Bulletins, and Safety Alerts), on the Department of Safety site on Metroweb, and through other safety promotional campaigns. Additionally, as Metro's SMS continues to mature, all employees are able to use Metro's interactive SMS dashboard to view the risks being actively managed at Metro and in their department, the status of corresponding mitigations, metrics that are used to measure effectiveness, and they will have the ability to report concerns or provide feedback. The dashboard launched in 2021 gets updated as each department implements SMS Safety Risk Management in accordance with Section 3.0, Safety Risk Management.

### 2.3 Communication of the Safety Management Policy

As part of the requirements of 49 C.F.R. § 673.23, Metro is committed to actively communicating its Safety Management Policy and Policy Statement throughout the organization. This communication involves two parts:

- 1) Dissemination and display of the documentation: Metro ensures that personnel can directly access the policy and statement.
- 2) Dissemination and display of supporting materials: Metro provides additional materials to help personnel understand how the policy applies to their specific contexts and work environments. This engagement begins with New Employee Orientation training and is reinforced through job-specific training, toolbox talks, and job safety briefings.

The Safety Policy and Policy Statement will be disseminated throughout the agency via Safety Bulletins, print and digital signage, newsletters, podcasts, and other employee communications. These will be prominently displayed in areas where personnel gather, such as breakrooms and waiting areas.

Executive management at Metro holds the primary responsibility for personally and actively communicating the Safety Management Policy to employees and contractors. Any changes to the policy must be approved and distributed by the senior executive team. This is achieved through the committee process, and each executive visibly endorses the policy to employees in their area of responsibility. The senior executive team's approval of the ASP, cascading safety communications, designation of Safety Committees and active involvement in driving SMS implementation are crucial for long-term success.

### 2.4 Necessary Authorities, Accountabilities, and Responsibilities

The scope and magnitude of an SMS encompasses the entire organization. Consequently, the success of an SMS depends on support from across Metro. At a minimum, every employee and contractor at Metro has the responsibility to report safety concerns when they are identified. This responsibility includes actively engaging in the processes described in Section 2.2, Employee Safety Reporting Program.

This section expands on the Necessary Authorities, Accountabilities, and Responsibilities identified in P/I 10.8 *Safety Management Policy*. The following Responsible (R), Accountable (A), Consulted (C), and Informed (I) matrix summarizes the support required from Metro leadership and key staff to ensure the successful establishment and implementation of SMS. The ensuing sub-sections expand on the matrix to outline the specific needs identified for each position.



	General Requirements	Safety Policy	Safety Risk Management	Safety Assurance	Safety Promotion
<b>Accountable Executive:</b> General Manager and Chief Executive Officer	A	A	A	A	A
<b>SMS Executive:</b> Executive Vice President and Chief Safety and Readiness Officer	R	R	R	R	R
<b>Agency Leadership and Executive Management</b>					
Executive Vice President and Chief Operations Officer	R	R	R	R	R
Executive Vice President and Chief Infrastructure Officer	R	R	R	R	R
Executive Vice President and Chief Digital Officer	C	C	R	R	R
Executive Vice President and Chief Planning and Performance Officer	C	C	C	C	C
Executive Vice President and Chief Financial Officer	C	C	C	C	C
Executive Vice President and Chief Customer Experience and Engagement Officer	C	C	C	C	C
Executive Vice President and Chief People Officer	C	C	C	C	R
<b>Key Staff</b>					
Senior Vice President of Safety	R	C	R	C	C
Department Accountable Leader	R	C	R	R	C
Director of Safety Policy and Promotion	R	R	C	C	R
SRCs	C	R	R	R	R

#### 2.4.1 Accountable Executive

The GM/CEO is Metro's Accountable Executive. The GM/CEO is ultimately accountable for ensuring that the SMS is implemented throughout the Metro system in accordance with this ASP. Additionally, the GM/CEO is accountable for ensuring action is taken to address sub-standard performance in Metro's SMS when required.

Metro's GM/CEO meets the FTA criteria for the Accountable Executive designation:

- Has the final authority over Metrorail, Metrobus and MetroAccess operations and maintenance
- Controls the financial resources required for the operations and maintenance of Metro's public transportation system
- Controls the human resources required for the operations and maintenance of Metro's public transportation systems

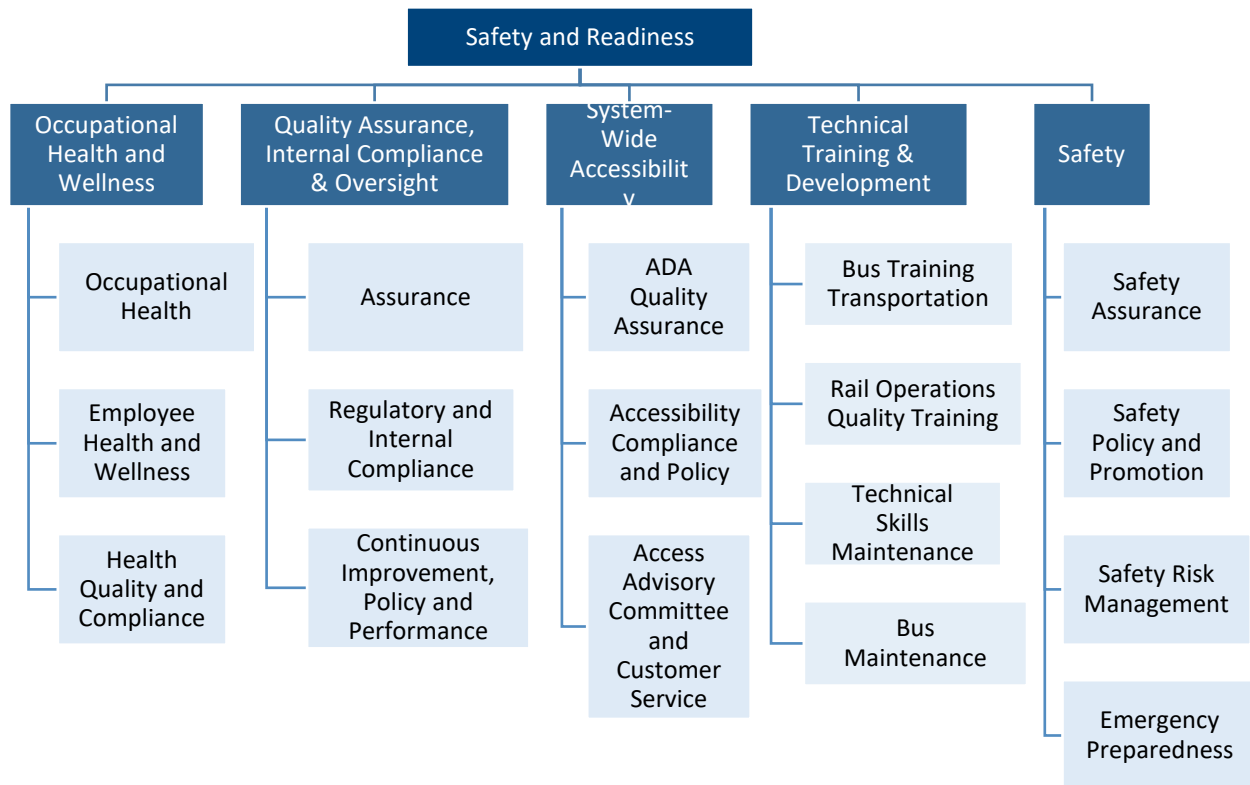
As the Accountable Executive, the GM/CEO has the following responsibilities for ensuring the SMS:

- Is properly implemented and performed throughout the Metro organization, including employee reporting programs
- Is actively, continuously and visibly communicating the importance of safety throughout Metro
- Is implemented in a manner that ensures that all executive level personnel are held responsible for their spheres of control; and each actively and continuously communicates the Metro SMS Policy and the area-specific SMS requirements to all employees in their areas
- Is the signatory to this ASP and the Transit Asset Management Plan, and is responsible to know and understand the contents of both documents
- Is appropriately addressed system wide; and participates actively with the ESC to guide Metro in safety and risk management, understand all risks at the agency, actively directs resource allocation activities and monitors safety performance of all areas
- Directs all required actions to mitigate SMS non-compliances, unacceptable and undesirable risks and implement continuous improvement activities

#### 2.4.2 SMS Executive

Metro's EVP/CSRO has been designated by and reports to the GM/CEO. The EVP/CSRO is a safety professional who has been adequately trained, holding both the DOT TSSP and PTSCTP certificates (among other credentials). The EVP/CSRO has responsibility for day-to-day implementation and operation of Metro's SMS. The EVP/CSRO leads the Department of Safety Readiness and does not serve in any other operational or maintenance capacities.

The Department of Safety and Readiness contains five functions as described below.



### *Occupational Health and Wellness*

The Office of Occupational Health and Wellness (OHAW) has primary responsibility for administering a Substance Abuse Testing Program for safety-sensitive employees and contractors in accordance with 49 CFR Part 40 - Procedures for Transportation Workplace Drug and Alcohol Testing Programs and 49 CFR Part 655 - Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations. It also provides the Employee Assistance Program, which supports employees through referrals to appropriate medical or rehabilitation treatment, and counseling for a variety of issues that may interfere with employees being able to safely perform job responsibilities, tasks and activities.

### *Quality Assurance, Internal Compliance & Oversight*

This department is an internal management resource to promote transparency and accountability by conducting independent reviews of operational processes; tracking and publicly reporting the status of regulatory safety corrective actions plans, and providing quality oversight of the new railcar acceptance program. It oversees the implementation of the enterprise Quality Management System Plan (QMSP), the performance of triennial safety reviews in accordance with 49 CFR 673; and control and administration of agency-wide P/Is.

### *System-Wide Accessibility*

The newest department within Safety and Readiness is responsible for establishing enhanced accessibility standards to improve customer and workplace safety by consolidating all accessibility related roles.

### *Technical Training & Development*

Technical Training and Development is responsible for Rail Certification, with future plans for expansion to Bus and other training functions. This department consolidates and streamlines delivery of all operational and safety training across the organization and leads educational activities within the Authority designed to prepare new operators, advance technical skills, and improve job performance.

### *The Department of Safety*

This department is responsible for the management of system safety, occupational safety and health, accident and incident investigation, emergency preparedness, and fire life safety. It performs safety oversight of the following: continuous hazard management process, construction safety, safety certification, safety data collection and analysis, industrial hygiene, safety training, safety program implementation, regulatory compliance, environmental protection, and monitors the implementation of the ASP. It is organized into four parts that intends to operationalize components of SMS:

#### **Safety Assurance**

The Safety Assurance function includes teams for Safety Data Analytics, Safety Investigations, Operations Safety Oversight, and Safety Certification and Engineering.

- 1) The Safety Data Analytics team measures and reports on Metro's SMS effectiveness, tracks performance targets, complies with applicable regulatory reporting requirements, and analyzes data to inform priorities. They use Metro's internally developed Safety Measurement System to collect the necessary data.
- 2) The Safety Investigations team conducts investigations according to specified procedures and manages Recommended Corrective Actions in Metro's Safety Measurement System to ensure implementation and oversight in accordance with P/I 10.4 *Incident and Accident Investigation*, Department of Safety Investigations Procedure (4131-3-01) and as detailed in Section 4.1.3, *Safety Investigations*.
- 3) The Operations Safety Oversight team manages compliance and oversees effectiveness of the safety risk management process through monitoring, audits, inspections, and addressing reported concerns. They also respond to reported safety concerns to ensure they are documented in the Safety Measurement System and coordinated with the responsible department for action. They also oversee safety in Metro construction projects and have the authority to interdict work if safety deficiencies or violations are observed.
- 4) The Safety Certification and Engineering team develops and implements Metro's Safety and Security Certification Program Plan, ensuring hazards are mitigated throughout the project lifecycle to reduce safety risks and prevent incidents.

#### **Safety Policy and Promotion**

This function provides oversight on SMS implementation overall as well as delivering on two SMS components.

- 1) The Safety Policy and Strategy team maintains the Safety Management Policy, SMS Strategic Roadmap, and this ASP. This includes the SMS Strategic Roadmap's tactical action plans, which are designed to ensure the milestones established are being implemented in a methodical, disciplined manner.

- 2) The Safety Promotion team is responsible for developing and implementing the employee and contractor engagement strategy in partnership with CSCM. This includes targeted campaigns to encourage employee safety reporting (such as the campaigns *Be a Hero Before we Need One* and *That's Doing Your Part*), safety communications (such as announcements, alerts, bulletins, hot sheets, videos, and articles in Metro's newsletter, *MetroVoices*), recognition events (such as *MetroAwards*), and SMS trainings.

### Safety Risk Management

The Safety Risk Management Function includes the following offices: Operating Practices, Occupational Safety and Health, and Safety Risk Management Program Administration and Environmental Management and Compliance.

- 1) The Operating Practices team maintains Metro Safety Standards and oversees the Rail Safety Standards Committee (RSSC). They coordinate activities related to updating the Metrorail Operating Rules and issuing Temporary and Permanent Orders.
- 2) The Occupational Safety and Health team ensures compliance with internal and external safety regulations, including 29 CFR Part 1910 *Occupational Safety and Health Standards*. They specialize in industrial hygiene, occupational safety, and construction safety engineering.
- 3) Safety Risk Management Program administration involves program specialists who facilitate proactive safety risk management across Metro. They oversee safety committees, employee safety reporting, and SRC development and training. The team facilitates hazard and risk assessments.
- 4) The Environmental Management and Compliance Team conducts Environmental Engineering and Environmental Services following Section 5.2.4 of the *Environmental Management, Environmental Management Policy and Program Manual*, and Environmental SOPs. Among other duties, they ensure the implementation of controls necessary to comply with regulatory requirements, set the standards for the correct handling and disposal of hazardous materials, and providing services to effectively manage and minimize pollution.

### Emergency Preparedness

The Emergency Preparedness function consists of two teams working together to enhance performance and minimize risk in Metro's incident management. The Planning and Exercising team, previously a part of the Department of Safety, has moved to the Metro Integrated Communications and Command Center (MICC). Alongside these teams, there are specific roles in emergency preparedness and operations across Metrorail departments, detailed in the EOP, companion policies, and SOPs.

- 1) The Response and Recovery Coordination (RRC) team staffs the 24/7 Mission Assurance Coordinator (MAC) role in the MICC as the EVP/CSRO's representative. The MAC's standard operating procedures, training, and responsibilities are finalized to seamlessly integrate into the overall emergency preparedness and incident management function, with a focus on ensuring effective response and customer safety. RRC also staff a primary responder for incident and emergency response which provides technical expertise and incident command functions as a part of Metro's Incident Management Framework (IMF) to facilitate Authority-wide coordination during emergencies and effective unified command with jurisdictional first responders.
- 2) The Prevention and Mitigation team and Fire Marshal identify and mitigate fire-life-safety hazards proactively, following the 700-WI001 Fire Inspection Procedure. They coordinate the incident after-action process, identify lessons learned, and manage corrective actions across departments to continually enhance incident management.

### 2.4.3 Agency Leadership and Executive Management

In addition to the GM/CEO and EVP/CSRO, the senior executive team includes the EVPs listed in Section 2.4, Necessary Authorities, Accountabilities, and Responsibilities. These leaders have been consulted on the development of this ASP, own the responsibility for reviewing and implementing their respective parts and sections of this ASP and understand the roles and responsibilities required of them and their organizations.

Metro's executive leadership is accountable for the safety performance of their respective departments. The following sub-sections provide an overview of their respective departments to include additional responsibilities, accountabilities, and authorities related to SMS where applicable. While the most up-to-date information about Metro's organizational structure, including names, titles and organizational charts can be found on Metro's intranet site, a brief summary is provided below.

#### *Operations*

The EVP/Chief Operations Officer (COO) reports directly to the GM/CEO and participates in the ESC, champions the Safety Policy, implements Safety Risk Management, cooperates with Safety Assurance, and participates in Safety Promotion as outlined in this ASP. The focus of this department is operations and rolling stock maintenance (e.g., Bus, Rail, MetroAccess services) along with the Metro Integrated Command & Communications Center, Transit Police, Supply Chain Management, and Reliability Engineering & Asset Management.

#### *Infrastructure*

The focus of this department is capital delivery and non-rolling stock maintenance (e.g., tracks, rail stations, bus stops) – enabling continuity throughout the infrastructure life cycle (e.g., design, build, maintenance, etc.). Within this department are divisions for each major asset type (e.g., Power, Track & Structures, Communications & Signaling, Facilities) that combine the engineering and maintenance functions for improved asset management.

#### *Customer Experience and Engagement*

This department includes the functions of Customer Service, Communications, & Marketing and Government Relations. In addition, it is responsible for community relations and outreach, and the general customer experience including advocacy for the customer in internal decision making.

#### *Planning and Performance Management*

This department conducts strategic planning for Sustainability, long range Planning and Strategy/Policy Development, Performance, Data & Research, and Intermodal service planning and scheduling. It provides performance-related functions (e.g., data, research, and analysis) across the organization as well as direct departmental support. Its objective is to enable efficient and effective decision-making and to streamline data governance.

#### *Finance*

This department includes all financial functions as well as Procurement and Capital Budget, Grants, Funding Management, Capital Review, and Capital Financial Reporting.

#### *Digital Modernization*

This department includes all Information Technology functions as well as a digital modernization function to facilitate Metro's transformation to a more digital organization.

### *People, Culture and Inclusion*

This department combines Human Capital functions, such as talent acquisition, talent management, employee development, labor and employee relations, compensation, and benefits with Diversity, Equity, and Inclusion, Equal Employment & Opportunity and Fair Practices

### *Legal and Compliance*

This organization manages all legal, ethics, regulatory compliance, and enterprise risk management matters for the Authority. The Legal department and Audit & Compliance department are combined into one organization to optimize the effectiveness of the related roles and frequent collaboration between those departments.

### *Your Metro Transformation Office*

This department is focused on the coordination and implementation of Metro's strategic transformation plan – Your Metro, the Way Forward – which sets a clear direction and clear priorities to drive the organization forward toward safe, reliable, and enhanced regional mobility. This department will also host the Metro IDEA Lab, a new initiative to source and promote collaborative innovation across the organization.

## **2.4.4 Key Staff**

The SVP/ACSO of Safety has been tasked by the EVP/CSRO with establishing Metro's SMS as outlined in this ASP.

SRCs have the responsibility of administering the implementation of the Safety Risk Management process, and supporting the implementation of the other three components of SMS. In Operations and Infrastructure Departments, SRCs are formal, permanent positions dedicated solely to the SRC role and responsibilities that report directly to the leadership of their associated departments. Departments outside of Operations and Infrastructure have designated SRCs within their department. As Safety Risk Management Implementation matures in 2024, the Department of Safety will collaborate with the departments to determine if formal permanent positions are needed. A full list Metro's SRCs is available on the Department of Safety intranet site.

The primary responsibilities of the SRCs include, but are not limited to:

- Implement Safety Risk Management as described in Section 3.0, Safety Risk Management, of this ASP resulting in the proactive identification, assessment, and mitigation of safety risks
- Perform oversight and monitoring as described in Section 4.0, Safety Assurance
- Work with accountable leaders to manage departmental risk registers. Ensure that all safety-related corrective action plans are being managed and addressed in coordination with senior leadership
- Lead and ensure that Facility and DSCs are held, and hazards brought forth are tracked and mitigated
- Monitor and ensure safety incident investigations are thorough and completed per P/I 10.4 *Incident and Accident Investigation*
- Monitor the Safety Risk Submissions for leading indicators of potential hazards, if applicable;
- Assist in maintaining SMS documentation
- Attend and report on SMS-related activities at all departmental safety committees and respective performance oversight meetings

- Assist Accountable Executive or SMS Executive in developing, implementing, and operating the agency's SMS as directed

In addition to the hands-on coaching and mentorship from the Department of Safety's Safety Risk Management Team, required training for SRCs includes:

- Various internal trainings on Metro's Safety Risk Management Process and Safety Committee Facilitation (Department of Safety Risk Management led), completed within three months of hire.
- One (1) hour course on SMS Awareness (FTA/Transportation Safety Institute [TSI] e-Learning), completed at the earliest opportunity;
- Two (2) hour course on Safety Assurance (FTA/TSI instructor-led Virtual Live Training) completed at the earliest opportunity;
- One (1) 20-hour course on SMS Principles for Transit (FTA/TSI, instructor-led) completed at the earliest opportunity;

#### 2.4.5 Safety Committees

- Another part of the Key Staff that implement Metro's SMS are the Safety Committees. Metro has a network of safety committees that provide support for developing, implementing, and operating the SMS as detailed in P/I 10.8 *Safety Management Policy*. As part of Safety Risk Management Implementation in 2023 and 2024, the network for safety committees is being re-aligned, standardized, and chartered. The new network includes these safety committees:
- Executive Safety Committee (ESC) – the governing body responsible for overseeing the development and implementation of SMS as outlined in this ASP. The ESC also manages and allocates the necessary resources to mitigate safety risks throughout Metro. Monthly, the ESC reviews Metro's risk profile, via the SMS Dashboard, to identify areas where additional resources are needed. To facilitate specific tasks, the ESC has established the following subcommittees.
  - Safety Certification Review Committee (SCRC) – the governing body that oversees safety and security certification at Metro in accordance with the *Safety and Security Certification Program Plan*.
  - Rail Safety Standards Committee (RSSC) – the governing body that reviews, discusses, verifies, and approves any new rules and procedures proposed, modifications or deviations to rules and procedures, and the rescinding of obsolete rule and procedures in accordance with SOP 4800-3-08 *Rail Safety Standard Committee SOP*.
  - Joint Labor and Management Safety Committee (JLMSC) – established in accordance with the Bipartisan Infrastructure Law, 49 USC § 5329(d)(5), composed of equal numbers of represented and non-represented employees. It supports the ESC in overseeing the development and implementation of SMS and proactively managing risk in accordance with this ASP.
- Department Safety Committee (DSC) – The governing body established to manage safety risk at the department-level, owners of departmental risk registers and are essential for the sustainment of the Safety Risk Management process. DSCs are facilitated and managed by the departmental SRC. Departmental Accountable Leaders are responsible for ensuring that risks on the department's risk register are mitigated to an acceptable level.
  - Safety Oversight Coordination Meetings – Three (3) are established, one for Construction, one (1) for Bus, and one (1) for Rail. These meetings are held once per



month, smaller meetings are scheduled as needed. The meetings bring together departmental SRCs and departmental Accountable Leaders to develop mitigations for safety risks that affect multiple departments. The meeting is intended to help drive a collaborative approach to Safety Risk Management at Metro.

- Facility Safety Committees (FSCs) are responsible for managing safety hazards at a particular facility, encompassing all departments located at that physical location. FSCs actively address and rectify local hazards while also escalating systemic and department-wide hazards and risks to their respective DSCs and SRCs. The facilitation and management of FSCs are carried out by the relevant departmental SRCs or their designated representatives.

DSCs are mandatory for Operations and Infrastructure departments, as well as other administrative functions within Metro, that have personnel exposed to safety risks. The DSC is established to manage their risk registers during SRM Implementation. Administrative and support departments, such as Reliability Engineering and Asset Management, will not have a DSC, but rather support the network of safety committees with their data analysis function. The table below establishes where DSCs are established or are being established through SRM Implementation. This network of DSCs will continue to evolve as SRM matures at Metro.

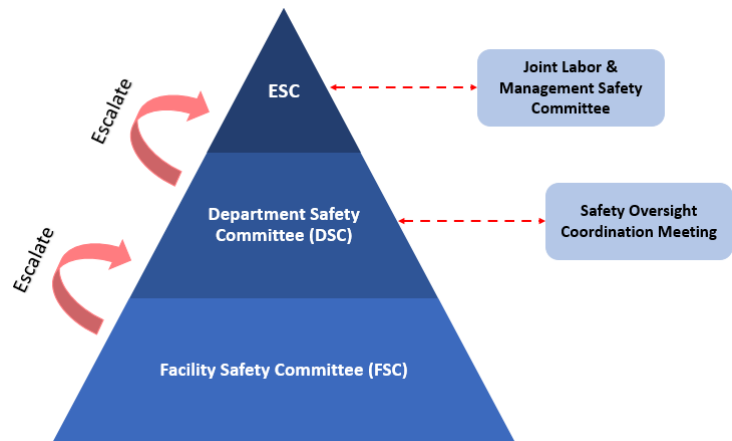
Department Safety Committees at Metro		
Department Name	Organization	Charter Date
Rail Transportation	Operations	CY2023
Chief Mechanical Officer	Operations	CY2023
Bus Transportation	Operations	CY2023
Bus Maintenance	Operations	CY2023
Metro Integrated Command and Communication Center	Operations	CY2024
Access Services	Operations	CY2023
Supply Chain Management	Operations	CY2023
Metro Transit Police Department	Operations	CY2024
Power	Infrastructure	CY2023
Communications and Signaling	Infrastructure	CY2023
Track and Structures	Infrastructure	CY2023
Plant Maintenance	Infrastructure	CY2023
Systems Maintenance	Infrastructure	CY2023
Elevators and Escalators	Infrastructure	CY2023
Project Delivery	Infrastructure	CY2024

Information Technology	Digital Modernization	CY2024
Safety and Readiness	Safety and Readiness	CY2024

Each DSC is led by an accountable Departmental leader who ensures the allocation of necessary resources to drive approved risk mitigations to completion. Additionally, FSCs are established at major Metro Facilities. This includes Metro HQ (L'Enfant, New Carrollton, and Eisenhower), Carmen Turner Facility, Rail Yards and Divisions, Bus Depots, and any other large Metro facilities that personnel operate out of, excluding Metro stations. As SRM Implementation progresses, the committees are being revamped, and additional committees will be established as deemed necessary by the Safety Risk Management Team. The ESC maintains the authority to establish additional committees as needed.

All Safety Committees shall be chartered, documenting the committee members, their roles and responsibilities, meeting frequency (minimum monthly), and how they capture hazards and risks from lower-level Safety Committees. The charters are reviewed and approved by the Department of Safety's Safety Risk Management Team and are stored in the Safety Committee Charter Library on the SRC Hub, an SRC resource page on the Department of Safety's Metroweb site. The Safety Risk Management Team also maintains a Network of Safety Committee Map on the SRC Hub, facilitating coordination and collaboration on safety risks. As SRM Implementation progresses, the committees will be chartered. The Safety Risk Management Team will begin to monitor the effectiveness of the new committees in 2024 and provide SRC's coaching and guidance to drive continual improvement and ensure all requirements established in this ASP are being met.

The network of Safety Committees allows for seamless escalation of safety risks from FSCs to DSCs, and ultimately to the ESC. Systemic and department-wide hazards identified at the FSCs are escalated to a relevant DSC. Safety risks and their associated mitigations managed at the DSC level, but requiring additional resources, funding, or addressing system-wide concerns, are escalated immediately to the ESC. The Departmental SRC works with the Safety Risk Management Team to facilitate escalations, ensure the appropriate



routing of concerns for mitigation and to provide necessary data for justifying the need for additional resources and funding. If issues are not escalated, the ESC maintains oversight by reviewing Metro's risk profile, via the SMS Dashboard, monthly. This allows the ESC to identify areas that need additional support and resources if progress is not being made to implement approved risk mitigations.

### 3.0 Safety Risk Management

The Safety Risk Management component of Metro's SMS has been designed to meet the requirements established by the FTA and the WMSC. In accordance with 49 CFR § 673.25 *Safety Risk Management*, this section of the ASP includes:

- 3.1 Safety Risk Management Implementation
- 3.2 Safety Risk Management Process

### 3.2.1 Safety Hazard Identification

### 3.2.2 Safety Risk Assessment

### 3.2.3 Safety Risk Mitigation

## 3.3 Ongoing Management of Safety Risk

There are different risk matrices currently in use across Metro, and their use does not conflict with the Safety Risk Management methodology. Each is designed for use by subject matter experts for the department's purpose at Metro. Each matrix is designed to guide a specific type of analysis and the matrices are designed to properly gauge the level of risk in the analysis. These matrices also help with the development of appropriate mitigations and are used to prioritize resources in reducing risks. The outputs from the matrices assist with communicating risk. For example:

- The Reliability and Asset Management Department uses the Aladon, The Risk and Reliability Global Network matrix, which partially defines risks in terms of loss type.
- The Occupational Safety and Health group within the Department of Safety will use a matrix with an "elimination" category which is desirable in controlling hazards in individual job tasks.
- The Metro Integrated Risk Management group developed a specific Enterprise Risk Management matrix that is used agency-wide to define risks.

The Safety Risk Management segment of the 2024 SMS roadmap includes key projects that have been prioritized to advance SMS development and implementation:

- Continued maturation and expansion of Safety Risk Management, particularly Safety Committees
- Launch Bus Safety Improvement Strategy
- Coordinate with Operations to conduct Line Operations Safety Assessment
- Launch Fitness for Duty Project with Health and Wellness
- Complete Job Hazard Analysis Implementation

These projects combine and complement one another to support and further the core priority, which is to implement safety risk management across operations and infrastructure.

## 3.1 Safety Risk Management Process

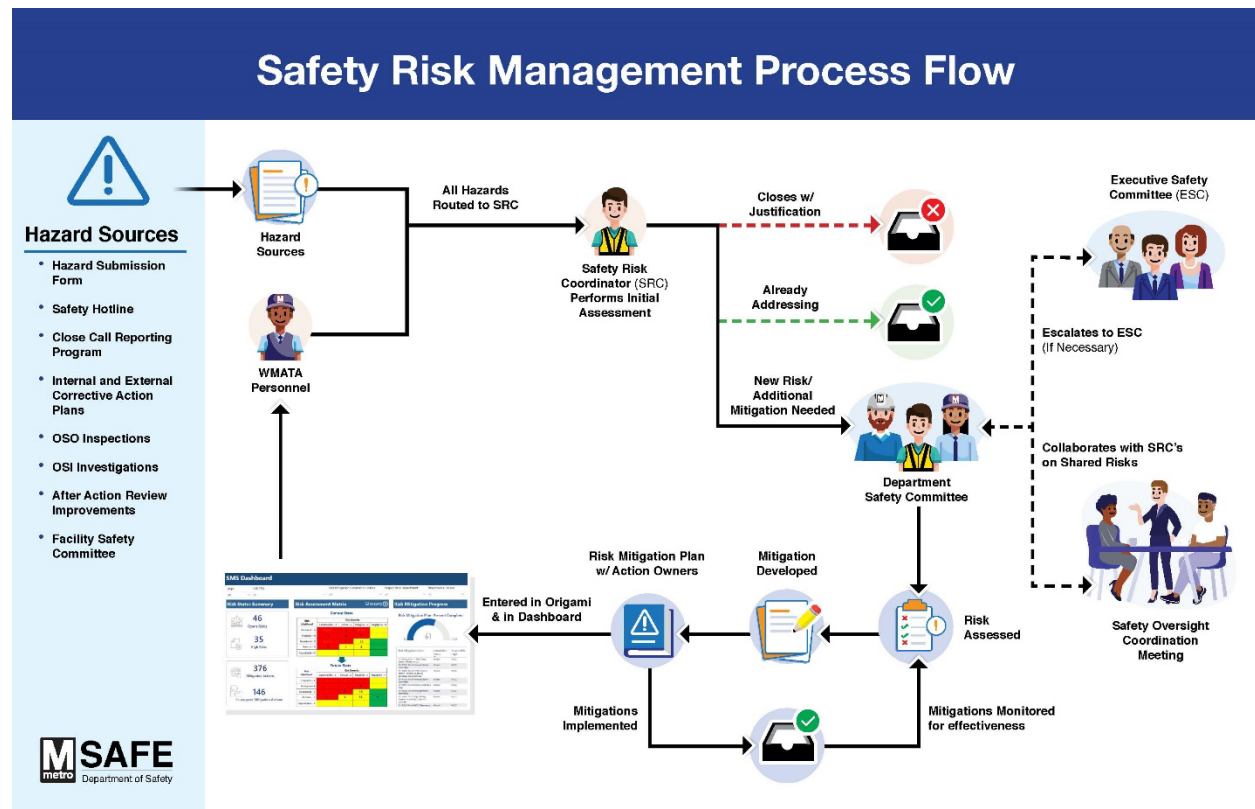
As part of the achievement of the milestone *Continued maturation and expansion of Safety Risk Management*, the MTPD, The Department of Project Delivery, and the MICC will adopt Safety Risk Management in 2024. Additional departments will be added based on the incorporation of input from a variety of sources to include safety performance indicators, internal input (such as ESC), and external input (such as the WMSC). Full details on the implementation status of the roll-out of the Safety Risk Management process is available on the Department of Safety intranet site.

The following Safety Risk Management process emphasizes the proactive identification, assessment, and mitigation of safety risks. This process is derived from the methodology outlined in MIL-STD-882E System Safety Standard Practice and aligns with the FTA's National Public Transportation Safety Plan recommendation. Safety Risk Management Program Specialists from the Department of Safety partner with each of the SRCs designated across Metro to assist in their implementation of this process. Implementation is guided by the Safety Risk Management Implementation Playbook, 4200-4-02. Completion of baseline Safety Risk Management is documented by:

- 1) Establishing a departmental Safety Risk Management Process, using 4200-4-01, Safety Risk Management SOP Template.

- 2) Departments safety risks documented in Origami and included in Metro's SMS Dashboard. The dashboard formalizes the safety risks identified, corresponding risk mitigations, status of risk mitigation implementation, and overall Metro safety risk profile. MIL-STD-882E applies.
- 3) Safety risk reporting capabilities that flow safety concerns directly to the SRC for inclusion in the Safety Risk Management Process.

As implementation of the Safety Risk Management process completes, departmental SRCs sustain the process laid out in this ASP, following the process flow below.



### 3.1.1 Safety Hazard Identification

The first step in the Safety Risk Management process is to identify hazards. During Safety Risk Management Implementation, an initial series of brainstorming sessions led by the SRC and supported by the Safety Risk Management Team are scheduled to engage the workforce. The sessions are planned to include front-line personnel and gather input from local Union representatives. During these sessions, discussions are held on historical safety performance (e.g., *what are the incidents or injuries that have occurred in the past?*), current safety performance (e.g., *is there anything keeping you up at night?*), and anticipated safety performance (e.g., *what do you think the next incident or injury is going to be and why?*). In addition to the feedback collected from the workforce, information is regularly monitored and collected by the SRC from a variety of sources:

- External Agencies**, e.g., WMSC, FTA, National Transportation Safety Board (NTSB) – A hazard analysis on these findings is performed and, where required, provided to the WMSC in accordance with the WMSC Program Standard

- **Employee Safety Reporting Program** - These reports are investigated in accordance with Section 2.2, *Employee Safety Reporting*, P/I 10.8 *Safety Management Policy*, and established MOUs
- **Inspections or Audits** - Corrective Actions resulting from inspections and audits are analyzed in accordance with WMSC Program Standard, Section 4.4, *Corrective Actions*, and SOP SARE-QUALITY-1.11 *Corrective Action and Preventive Action procedure*
- **Investigations** – Investigations are conducted on safety events in accordance with the WMSC Program Standard and SOP 800-01 *Incident and Accident Investigations of Rail, Bus, and MetroAccess*
- **Safety Committees** – Safety Committees oversee Safety Risk Management in accordance with Section 3.1, *Safety Risk Management Process*, departmental Safety Risk Management SOPs, and Safety Committee Charters
- **Safety Performance Indicators** - Trends and patterns detected from safety performance indicators are analyzed in accordance with Section 4.1, *Safety Performance Monitoring and Measurement* and the Quality Management System Plan (QMSP)
- **Data Analysis** - Data driven risk analysis is performed in accordance with 3.1.2 *Safety Risk Assessment* and based on the MIL-STD-882E *System Safety Standard Practice*
- **Industry Data** - Metro reports to and collects industry data from NTD to compare safety performance

After the initial brainstorming sessions are completed, the SRC compiles the information gathered and groups it into themes based on patterns and commonalities. In partnership with the Safety Risk Management Team, the results are interpreted to identify the risks in terms of who is exposed to what (e.g., customers use escalators like they were stairs when a malfunction occurs resulting in slips, trips, and falls). The drafted risks that were identified are then brought to the DSC for review and feedback. When finalized with the DSC, the identified risks are loaded into Origami, Metro's Safety Risk Management Software. Origami is a customized software solution that is used to support and sustain the Safety Risk Management process. Specifically, Origami is used by the Department of Safety, SRCs, departmental Accountable Leaders, and Safety Committees to track and manage identified safety risks, priorities based on risk analysis, and corresponding safety risk mitigations. This information is entered into Origami by SRCs, which then feeds the SMS Dashboard that is established as part of baseline implementation. The Metro Hazard Submission Form is also introduced and links are established on the department's Metroweb page. The Metro Hazard Submission Form is a simple reporting mechanism that allows employees to submit safety reports directly to their SRC.

Once Safety Risk Management implementation is completed, and new information becomes available, the SRCs continue to follow the newly established departmental Safety Risk Management Process outlined above, and depicted in the process flow in 3.1. As new reports are received by the SRC, they determine whether an existing risk has already been identified or if a new safety risk needs to be drafted. New information associated with existing risks will be reviewed to determine if the risk definition needs to be updated or assessment needs to change (as outlined in 3.1.2). New information that drives the identification of a new risk will be drafted by the SRC and brought to the DSC for review when required.

### 3.1.2 Safety Risk Assessment

Identified risks are subjected to an assessment based on the likelihood and severity formula benchmarked from MIL-STD-882E *System Safety Standard Practice*. Likelihood is measured based on the frequency (or how often risk is expected to occur). A combination of quantitative and qualitative data is

used to assess likelihood. Safety Performance Indicators such as injury or incident rates associated with each risk are reviewed along with existing mitigations, employee reporting, feedback from management, results from Quality or Safety Assurance oversight, and findings from the WMSC (as well as other external agencies). The SRC collects these inputs and then holds a session with the DSC to assess the likelihood of each risk based on a discussion and interpretation of relevant data. The likelihood scale has a letter-based value range of A to E. The higher the grade, the more likely the risk is expected to be realized, as reflected in the following table.

Probability	Value	Qualitative Meaning	Quantitative Meaning
<b>Frequent</b>	A	Opportunity for risk to be realized expected to occur often	Probability of occurrence greater than or equal to $10^{-1}$ (10%)
<b>Probable</b>	B	Opportunity for risk to be realized expected on a recurring basis	Probability of occurrence less than $10^{-1}$ (10%) but greater than or equal to $10^{-2}$ (1%)
<b>Occasional</b>	C	Opportunity for risk to be realized expected to occur	Probability of occurrence less than $10^{-2}$ (1%) but greater than or equal to $10^{-3}$ (0.1%)
<b>Remote</b>	D	Opportunity for risk to be realized not expected to occur but possible	Probability of occurrence less than $10^{-3}$ (0.1%) but greater than or equal to $10^{-6}$ (0.0001%)
<b>Improbable</b>	E	Opportunity for risk to be realized not expected to occur and almost inconceivable	Probability of occurrence less than $10^{-6}$ (0.0001%)

Severity is measured based on the consequences expected from the risk occurring. A combination of quantitative and qualitative inputs are also used to assess severity. Historical safety performance indicators such as the nature of the injury experienced, extent of property damage, and length of service disruption are reviewed along with existing mitigations, employee reporting, feedback from management, results from Quality or Safety Assurance oversight, and findings from the WMSC (as well as other external agencies). After likelihood is assessed, the DSC assesses the severity of each risk based on a discussion and interpretation of this data. The severity scale has a number-based value range from 1 to 4. The lower the number value assigned, the more severe the consequence is expected to be as reflected in the following table.

Severity	Value	Meaning
<b>Catastrophic</b>	1	Risk realization expected to result in one or more of the following: death, permanent total disability, loss of passenger/crew occupied volume with equipment damage causing separations in structure, infrastructure damage that suspends service through the affected area for greater than 24 hours.
<b>Critical</b>	2	Risk realization expected to result in one or more of the following: permanent partial disability, injuries/illness that results in hospitalization, loss of passenger/crew occupied volume with equipment damage that causes openings but no separations in structure, infrastructure damage that suspends service through the affected area for greater than 2 and up to 24 hours.



<b>Marginal</b>	3	Risk realization expected to result in one or more of the following: injury or illness resulting in one or more lost work day(s), loss of passenger/crew occupied volume with equipment damage that causes no openings in structure, infrastructure damage that suspends service through the affected area for more than 30 minutes and up to 2 hours.
<b>Negligible</b>	4	Risk realization expected to result in one or more of the following: injury or occupational illness that does not result in a lost work day, no loss of passenger/crew occupied volume, equipment or infrastructure damage that does not suspend service nor cause a delay through the affected area for more than a maximum of 30 minutes.

Metro applies discretion to evaluate and assign risk to a given hazard on a case-by-case basis. The assessment of likelihood and severity (and therefore, safety risk) of a given hazard is based on the totality of the circumstances associated with each specific hazard. Upon completing the risk assessment for each risk, the SRC enters the results in Origami to establish the Current State Risk Rating, which is then visible on the SMS Dashboard. The following risk assessment matrix is embedded with stoplight criteria resulting in the assessment for each risk depicted as high (red), medium (yellow) or low (green), which informs how the safety risks will be prioritized.

Risk Probability	Risk Severity			
	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
Frequent – A	1A	2A	3A	4A
Probable – B	1B	2B	3B	4B
Occasional – C	1C	2C	3C	4C
Remote – D	1D	2D	3D	4D
Improbable – E	1E	2E	3E	4E

Risk Index		
<b>Red</b>	1A, 2A, 3A, 1B, 2B, 3B, 1C, 2C, 1D	CEO, COO, and CSRO approval required to continue activity without level-changing mitigations in place.
<b>Yellow</b>	4A, 4B, 3C, 2D, 3D, 1E, 2E, 3E	VP level approval required to continue activity without level-changing mitigations in place.
<b>Green</b>	4C, 4D, 4E	Risk effectively mitigated or considered so unlikely its acceptable as-is.

### 3.1.3 Safety Risk Mitigation

After the risk assessment is complete, the risk mitigation step involves determining what actions need to be taken to reduce them to as low as reasonably practicable. The risks assessed as high are prioritized accordingly, followed by medium risks, and then low risks (as required). The SRC performs research to determine whether there are risk mitigations already in place as well as any other mitigations that are already in work (e.g., as part of a CAP in response to an audit finding). The SRC compiles this information for each risk and then holds a session with their DSC. The following criteria (based on the Hierarchy of Controls) is applied when developing risk mitigations:

- **Elimination:** Mitigations designed into the operation that eliminate the potential for exposure to the risk (e.g., the station is shut down when an escalator malfunctions, eliminating the possibility of customers getting hurt while using them as stairs)
- **Substitution:** Mitigations designed into the operation that result in avoiding the potential for risk exposure (e.g., the station remains open when an escalator malfunctions, but customers are re-directed to actual stairs or elevators to avoid use of the malfunctioning escalator)
- **Engineering Controls:** Mitigations designed into the operation that trigger controls when the potential for risk exposure increases (e.g., an automatic gate is activated when an escalator shuts down, creating a barrier that deters customers from using them as stairs)
- **Administrative Controls:** Mitigations designed to change human performance or behaviors in response to the risk (e.g., every three minutes, the station will announce the escalator is out of service and advise customers to use the actual stairs or elevators)
- **Personal Protective Equipment:** Mitigations designed to protect from exposure to the risk while an activity is performed (e.g., an attendant will hand out helmets to customers so in case they fall while climbing a shutdown escalator, their head is protected).

At the DSC, the mitigation criteria are applied with the most feasible and effective mitigations prioritized accordingly. For risks and mitigations that span multiple departments, SRC's bring concerns to the Safety Oversight Coordination Meeting. This meeting drives collaboration with other departmental SRCs and Accountable Leaders to address risks and develop and implement mitigations in a timely manner.

Any risk mitigations that require additional resources (personnel, funding, etc.), including those that are system-wide, or requiring support beyond the mitigating capacity of the DSC will be escalated to the ESC. The magnitude and complexity of a safety risk drives its escalation from FSC to DSC and ultimately to the ESC, as defined in Section 2.4.5. When necessary, the ESC will task its subcommittees to address safety risks. For example, the JLMSC has been established to:

- Identify and recommend risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the Metro's safety risk assessment
- Identify mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended
- Identify safety deficiencies for purposes of continuous improvement

During Safety Assurance activities outlined in Section 4.1, Safety Performance Monitoring and Measurement, it may be determined that certain safety risks require dedicated Corrective Action Plans (CAPs) for effective mitigation. In such cases, the SRC collaborates with the Department of Safety and the Department of Quality to develop CAPs and, if applicable, involves the WMSC as required by the Program Standard.

The SRC takes responsibility for assigning owners and estimated completion dates to each mitigating action. Once the mitigation plans are established, they are entered into Origami. Approval of all mitigation plans in Origami is required from Departmental Accountable Leaders. Subsequently, a risk assessment is conducted as part of goal setting to forecast the expected reduction of each risk. For instance, if there were 30 customer injuries per month due to malfunctioning escalators, the implemented risk mitigations may aim to reduce the number to less than five injuries per month. This process results in a future state risk profile that defines the organization's approach to achieving practical risk mitigation. As the risk mitigations are implemented, the SRC holds meetings with the DSC to evaluate progress and make adjustments to risk levels and priorities accordingly. This ensures ongoing assessment and adaptation of risk profiles within the department.



## 3.2 Ongoing Management of Safety Risk

The SRCs play a crucial role in the systematic implementation of the Safety Risk Management process by regularly reviewing and prioritizing identified risks and mitigations. This review is driven by various factors such as Safety Assurance results, internal safety reviews, audits, employee reports, performance indicators, and system changes. The SRCs are responsible for facilitating monthly meetings of the DSCs at a minimum, although additional meetings or integration into existing ones may be arranged as needed to ensure timely addressing of safety risks.

The DSCs consist of representatives from all levels of the department, including subject matter experts and support from the Department of Safety and other departments when necessary. The SRCs, with support from the Safety Risk Management Team, utilize Origami as a tool to document risks, conduct risk assessments, and track mitigations. The Safety Data Analytics team incorporates each department into the SMS dashboard, providing employees with access to safety risks, mitigation plans, measurement of effectiveness, and report submission.

To ensure consistent implementation of the Safety Risk Management process within their departments, SRCs develop standard operating procedures aligned with the Safety Risk Management Process (4200-4-01) and this ASP.

### 3.2.1 Occupational Safety and Health Risk Management

The Office of Occupational Safety and Health subject matter experts (SME) in the disciplines of industrial hygiene and occupational safety engineering, oversee Metro's occupational safety and health programs. The SMEs determine the applicable regulatory requirements and establish internal directives via Metro's Occupational Safety and Health Programs (OSH Programs) which cover, as applicable, 29 CFR Part 1910 *Occupational Safety and Health Standards*, 29 CFR Part 1926, *Safety and Health Regulations for Construction*, and other incorporated by reference standards. The Office's priority is the health, safety, and well-being of Metro's workforce by minimizing injuries and illnesses from exposure to occupational hazards. The SMEs also provide technical analysis and expertise to the workforce through the anticipation, recognition, evaluation, and control of workplace hazardous conditions and by designing solutions and workplace practices to mitigate them.

The Office of Occupational Health and Wellness is developing and will oversee *Metro's Fitness for Duty Program*, in close collaboration with the Operations, People, Culture & Inclusion, and Infrastructure Organizations and the Office of Safety Risk Management. Metro's Fitness for Duty program provides an overarching framework on how Metro manages fitness for duty and references policies and procedures that are applicable. The Fitness for Duty program will help promote the safe movement of Metro vehicles and the demanding conditions of operating and maintaining vehicles and systems. The program aims to ensure that an employee is capable, on any given day, to carry out the duties of the job competently and safely with no physical conditions that would otherwise affect their ability to complete the work as required. The program will define Metro's requirements for physical performance, provide mechanisms to assess compliance with medical standards, and sets forth procedures to reduce the risk of impaired performance.

The Milestone *Complete Job Hazard Analysis Implementation* builds on the work initiated in 2023 with the establishment of standards and acceptable practices. In 2024, these will be brought to full implementation in the day-to-day work of Metro's employees and contractors. In order to systematically identify and mitigate workplace hazards by analyzing job tasks and their associated risks, this project will conduct JHA workshops and training sessions for employees, facilitating job task analysis to identify hazards, and developing and implementing control measures to minimize risks. The project will involve

collaboration with relevant departments, such as Human Capital and Operations, to ensure the integration of JHA into job descriptions, training programs, and safety protocols.

### 3.2.2 Operational Safety Risk Management

In 2023, the Department of Safety's Operating Practices team launched the Metrorail Operating Rulebook (MOR). In 2024, the team will partner closely with Operations to establish *Line Operations Safety Assessments*. These assessments will enhance and improve on-site safety inspections, promote the timely review of operational procedures and protocols, enable the analysis incident data, and engage with front-line staff and operators to gather insights and feedback. SRCs and DSCs for each department will develop action plans, implement safety enhancements, and monitor the effectiveness of the recommended improvements.

### 3.2.3 Safety Certification

The Safety and Security Certification team in the Department of Safety will continue to implement corrective actions related to the WMSC's August 2021 finding, (WMSC-21-C0118), regarding its safety certification process. In anticipation of supporting Metro's 10-year capital plan, the Safety Certification and Engineering function will continue to add staff and advance integration with these key partners to ensure evaluations are conducted and certification requirements are embedded at the beginning of each project's lifecycle.

### 3.2.4 Environmental Risk Management

Every executive, director, manager, supervisor, and employee bears the responsibility of environmental compliance. Environmental management and compliance should be seamlessly incorporated into decision-making procedures, programs, tasks, and all relevant activities to effectively address environmental concerns and meet applicable requirements.

To ensure compliance with environmental regulations, senior managers at each facility are assigned collateral duties by the department's senior management as Environmental Compliance Officers and Deputy Environmental Compliance Officers. These individuals undergo a two-day Environmental Compliance Officer training to carry out their compliance responsibilities and are accountable for upholding environmental regulations. The Department of Safety provides them with technical guidance and actively monitors regulatory compliance throughout the organization.

At Metro, industrial, maintenance, support, and construction activities must adhere to relevant federal, state, and local environmental protection laws, standards, and regulations. Metro's Environmental Management Program Manual forms the foundation of the organization's environmental program, while the Environmental SOPs serve as a reference for daily operations concerning environmental compliance. These and other environmental management policies are available on Metro's intranet, including Environmental Design Criteria (4730-3-01) and Metro's Construction Safety and Environmental Manual.

## 4.0 Safety Assurance

The Safety Assurance component of Metro's SMS has been designed to meet the requirements established by the FTA and WMSC. In accordance with 49 § Part 673.27 *Safety Assurance*, this section of the ASP includes:

- 4.1 Safety Performance Monitoring and Measurement
- 4.2 Management of Change

#### 4.3 Continuous Improvement

#### 4.4 Corrective Action Plans

Additionally, the Safety Assurance segment of the SMS roadmap includes key programmatic milestones that have been prioritized to advance SMS development and implementation:

- Implement improved Voluntary Safety Reporting Program
- Build ownership of risk management in Operations through a shared investigative process
- Strengthen environmental, health and safety data collection, sharing and reporting capabilities
- Initiate the Emergency Management Accreditation Program

In order to accurately track all safety reports from all sources, the Safety Data Analytics team will *Coordinate with Operations, Infrastructure, and IT to establish a consolidated SMS data system*. The project aims to centralize safety-related data, enabling comprehensive analysis and effective decision-making. Key activities include identifying existing data sources, integrating data collection processes, developing a standardized reporting framework, and implementing a secure and accessible database. The project will involve close coordination with relevant stakeholders to ensure data accuracy, establish data sharing protocols, and promote a data-driven approach to safety management and risk mitigation.

#### 4.1 Safety Performance Monitoring and Measurement

Beyond the day-to-day monitoring of safety performance, the Assurance team is engaged in several key initiatives to improve performance. The *Voluntary Safety Reporting Program* designed in 2023 will be implemented in 2024. Key activities include revising and streamlining the reporting processes, providing training and guidance to employees on the importance of reporting, and revamping a confidential and non-punitive reporting system. The project will involve promoting awareness and participation in the program through communication campaigns and ensuring that reported safety concerns are appropriately addressed and investigated.

While full integration into the SMS is not yet possible for Metro's environmental data, the milestone, *Strengthen Environmental, Health and Safety Data Collection, Sharing And Reporting Capabilities*, is the first step in that direction. The effort aims to improve responsiveness to environmental incidents by improving tank monitoring software and Initiate process to transfer Geographic Information System (GIS) environmental data to Metro Enterprise GIS System. While Enterprise GIS is currently limited to stormwater infrastructure, future improvements will add additional information to permit shared management of facilities and improved planning for future construction.

##### 4.1.1 Monitoring Operations and Maintenance Procedures

The Quality Management System Plan (QMSP) monitors compliance with and sufficiency of operational and maintenance procedures at Metro across all offices, departments, vendors, contracts, and projects. It guides personnel on how to meet its 15 core standards, which are aligned with the FTA Quality Management System guidelines. Each organization must produce a Quality Management Plan (QMP) that outlines how it ensures compliance with the QMSP. Each QMP includes workflow, documentation, performance metrics, quality control measures, and continuous improvement initiatives. Along with its supporting documents, each QMP describes the practices, assigns responsibilities to personnel (by name or position), sets the inspection and testing requirements and the acceptance criteria. It includes any regulations, industry standards, organizational policies, internal guidelines, and best practices necessary to provide the desired outcome. The full list of requirements can be found on the Department of Quality's QMSP intranet site.

The Department of Quality communicates the status of QMSP implementation through monthly status reports provided to departmental leadership, which include the following Key Performance Indicators (KPIs):

- The number and status of identified controlled documents for each department
- The number and status of applicable QMS Core Standards
- The number and percent of department employees who have completed the QMSP Computer-Based Training (CBT)

Departments that perform maintenance activities are required to coordinate across Metro to develop and maintain Maintenance Control Plans that include:

- All inspections, their intervals and requirements, and their documentation, verification, and distribution
- The applicable standards (regulatory, industry and internal) for all aspects of maintenance
- Procedures for all aspects of maintenance
- Testing processes and procedures for all maintenance activities
- Standards and requirements for scheduled maintenance, deferred maintenance, and determination (destruction/condemnation/disposal)
- Sources of reporting for deficiencies
- Equipment, and small and large tools required to perform the maintenance activities, including IT systems, software, and hardware
- Minimum training requirements for personnel engaged in maintenance activities

#### 4.1.2 Monitoring of Operational Safety Risk Mitigations

Metro has multiple internal safety reviews to monitor compliance with its SMS as described in this ASP. These reviews are required under 49 CFR 673.27(b)(2), and include: The triennial internal safety review program, Internal self-assessments, performance data tracking, the Employee Voluntary Safety Reporting programs.

The agency's assessment of safety performance includes developing and carrying out a plan (or plans), under the direction of the Accountable Executive, to address safety deficiencies identified during a safety performance assessment (§ 673.27(d)(2)). The safety assurance teams in the Department of Safety assure that these activities take place.

##### *The Triennial Internal Safety Review Program*

The Department of Quality manages and executes this program, which is mandated by 49 CFR 674.27(a)(4). Compliance with this ASP is assessed for department's functional areas to include Engineering & Maintenance, Service Delivery, and Capital Program Management & Execution once every three years. In cases where non-compliances, deficiencies, or failures of SMS are identified, corrective action plans must be developed and implemented by the respective department or functional area.

The Department of Quality Standard Operating Procedure (QICO-PRO-P01, *Internal Safety Review Notification and Reporting Procedure*) documents activities related to triennial reviews. According to this procedure, the Department of Quality notifies the WMSC and provides the Scope of Work, and checklist that will be utilized during the review at least 30 days before the review commences, in accordance with the WMSC Program Standard.

On or before February 1<sup>st</sup> of each year, the Department of Quality submits an annual Safety Review Report to the WMSC, which is endorsed by the Accountable Executive. WMSC will review and approve

the report in accordance with the process reflected in their Program Standard. This report encompasses the following elements:

- A summary of all completed Metro internal safety reviews performed or completed during the prior calendar year (January–December).
- Findings of all internal safety reviews with clear indication of whether each safety element complies with the PTASP or other relevant documentation.
- An itemized list of internal Corrective and Preventive Actions (iCAPAs), their actual or scheduled completion date, and the status for each iCAPA.
- A letter signed by the General Manager certifying that Metrorail is compliant with the PTASP. This certification letter must describe compliance with all PTASP elements and not just those elements that were subject to internal safety reviews in the previous year. For areas not in compliance, Metro must state the action being taken to achieve compliance.

The Department of Quality regularly provides reports on the outcomes of internal safety reviews to the ESC on a quarterly basis, at minimum. Furthermore, significant findings from these reviews are reported to the ESC and other relevant safety committees. The Department of Quality also reports on the development of – and progress made with – corrective and preventive actions in accordance with SARE-QUALITY-1.11 Corrective Action and Preventive Action Procedure, in response to review findings.

#### *Internal SMS Self-Assessment*

Each department and functional area is responsible for conducting an annual audit of its own SMS compliance. The purpose of this audit is to verify that hazards are being appropriately identified, assessed, and mitigated through the safety risk management process.

While the SRCs are responsible for the establishment of their department’s internal assessment process, the Safety Risk Management Team from the Department of Safety works with each SRC to ensure these processes are of high-quality and are consistent across the Authority. Once established, the Assurance team monitors compliance.

#### *Performance Data Tracking*

The Department of Safety’s Safety Data Analytics team works with the SRCs to determine how the effectiveness of risk mitigations will be measured. Each risk will have KPIs that inform whether mitigations are working as intended or if additional action needs to be taken. For example, Maximo work order completion might be a measure of effectiveness for mitigating the risk of a fire and smoke condition. The higher the work order completion rate would theoretically drive a lower incident rate. At a minimum, Department of Safety holds a monthly meeting with SRCs where lessons learned from Safety Risk Management implementation are discussed which include but are not limited to determining KPIs, safety target setting, and interpreting changes in KPI performance.

#### *Employee Voluntary Safety Reporting Programs*

Each department and functional area within the organization is obligated to monitor employee reporting, take action on reports, and update employees on progress. This is accomplished through the activities of the SRCs and DSCs, detailed elsewhere in this document. As the SMS continues to evolve and improve, the use of dashboards will be implemented to enhance the sharing and presentation of this information. These dashboards will enable more efficient and effective communication and analysis of the collected data.

EVPs shall receive monthly reports on the safety reports for their area through the SMS Dashboard, safety committees, and discussed at the Executive Safety Committee (ESC) or other means of their

preference. Additionally, summaries of employee reporting will be made accessible to all departments and areas for their reference and analysis.

The Department of Safety conducts monthly assessments of the Safety Hotline and any reports received directly by the Office of Inspector General (OIG). However, if the OIG's information pertains to an ongoing Department of Safety investigation or if anonymity is specifically requested, it will be handled separately. The OIG will provide reports on any such investigations at the Board's direction.

#### *Safety Oversight Inspections*

The Department of Safety conducts regular oversight inspections of the operations and maintenance activities of Metrorail, Metrobus, MetroAccess, and their supporting maintenance groups. These inspections support Metro's compliance with 49 CFR § 673.27(b), including:

- Monitoring operations and maintenance activities for compliance with, and sufficiency of, the agency's procedures for operations and maintenance. (673.27(b)(1))
- Monitoring safety risk mitigations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended; (673.27(b)(2))
- Inspecting and validating information reported through any internal safety reporting programs. (673.27(b)(4))

Internal Safety Reviews and data from other quality review activities in section 4.1.1 may be used to inform and prioritize of Safety Oversight activities

#### **WMSC Risk Based Inspection Program**

Metro will work in consultation with the WMSC to establish policies and procedures regarding WMSC's access to conduct inspections and collect data in accordance with the requirements of 49 U.S.C. § 5329 (k)(1)(b) and (k)(2)(b) and any forthcoming updates to 49 CFR §673 and 674, the WMSC program standard, and the WMSC Compact.

#### **4.1.3 Safety Investigations**

Metro must report all safety events (accidents, incidents and occurrences) as required by the FTA and WMSC. If an event qualifies as an accident, Metro must notify the WMSC and FTA within two hours. The WMSC Program Standard outlines the reporting process, while the FTA is notified through the USDOT Transportation Operations Center via email at TOC-01@dot.gov or by phone at (202) 366-1863.

The document, Department of Safety Investigations Procedures, 4131-3-01, provides detailed instructions on notification and reporting for Rail, Bus, and MetroAccess incidents and accidents. It also sets the investigation process, including the notification and investigation steps, timelines, investigation milestones, expected reporting outcomes, and how Metro works with the WMSC. Each safety investigation is conducted in compliance with Metro P/I 7.7.3 *Drug and Alcohol Policy and Testing Program*, which establishes requirements and responsibilities for administering the required programs. The Investigation Report evaluates the contributing factors and root causes and applies the Just Culture Flowchart to the analysis of the choices of the individuals involved. Corrective actions are developed by the Department of Safety investigating entity along with the operational department in accordance with SOP SARE-QUALITY-1.11 *Corrective Action and Preventive Action Procedure*. These actions are electronically tracked using the Safety Measurement System and monitored through to completion.

If WMSC leads their own investigation, Metro will provide the WMSC with the resources and information necessary to conduct the investigation in an effective manner on a timeline set by them. WMSC investigators will determine whether CAPs are required to address the root and contributing causes of the safety event. At the conclusion of the investigation, the WMSC provides a draft report to Metro. The Department of Safety will convene a working group of applicable departments to review and



comment on the report. Metro will submit comments to the WMSC within 15 days of receipt of the report.

In 2024, the Safety Investigations Teams will *Build Ownership of Risk Management in Operations Through a Shared Investigative Process*. SRCs will be directly involved in the investigation process, particularly the Just Culture analysis. To prepare for this objective, the Office of Safety Investigations is undergoing a ramp-up process that involves training staff and updating policies and procedures to incorporate Just Culture into the investigations process. Upon completion, OSI will partner with Safety Risk Management (SRM) to present Just Culture to the SRCs through their existing meeting schedule and select a few groups to pilot the Shared Investigative process. The success of the pilot will be measured using survey results from participants. Once successful, the Shared Investigative Process will be rolled out to additional groups in Operations.

#### 4.1.4 Information Monitoring

Metro departments and functional areas are each responsible for working with the Department of Safety to identify, collect and analyze the data required to measure the effectiveness of the actions taken to reduce their safety risks as low as reasonably practicable. This information will be used for three purposes:

1. To ensure all departments and functional areas establish and achieve performance targets related to their daily operations;
2. To ensure that the system-wide performance measures are being met;
3. To ensure that all departments and functional areas are aware of trends, hazards, and safety performance in all other departments.

Sources of data include, but are not limited to:

- Employee voluntary reporting systems and Safety Committee activities
- Supervisory reports, such as field reports and observations
- Scheduled inspections and audits, such as preventive maintenance, procedural compliance activities, and quality control activities
- Qualitative Performance results from drills, exercises and actual emergency events
- Quantitative performance results, NTD data collection and reporting, Key performance indicators
- Customer and public comments, complaints, recommendations, injury reports, survey results, etc.
- Safety Event Investigations (hazards, collisions, derailments, security, etc.)
- Planning and scheduling data collection
- Feedback on Safety Promotion activities (job briefings, awareness campaigns, departmental meetings)
- Safety and security certification, system modification and procurement activities
- Drug and alcohol compliance programs
- Training and training QA activities
- Transit asset management activities

All departments have an obligation to actively monitor their operations, both directly through field observations and indirectly through data collection. Additionally, they are responsible for gathering voluntary data and information through the employee safety reporting program. The primary objective of these efforts is to promptly identify potential hazards and ensure that data is collected from various

activities, facilitating trend analysis and enabling the prevention of recurring incidents and future adverse consequences.

Safety has Process Number 4132-4-02, Data Collection for National Transit Database Reportable Events, which outlines how safety data is managed. To effectively address deficiencies and lapses in terms of risk and resource allocation across the entire system, EVPs are expected to be well-versed in safety-related data and performance information. This familiarity ensures that they can appropriately address any issues during ESC meetings and take necessary actions to mitigate risks and allocate resources effectively.

#### 4.1.5 Emergency Risk Management

With the adoption of the Incident Management Framework and agencywide training in 2023, Metro plans to initiate the Emergency Management Accreditation Program in 2024. This involves demonstration through self-assessment, documentation and peer assessment verification that Metro meets an accredited Emergency Management Standard. The emergency management program uses the accreditation process to validate the capabilities of disaster preparedness and response systems within Metro to be comprehensive and effective.

#### 4.2 Management of Change

Through implementation of its QMP and the Safety Risk Management process, each department establishes controls for design, documentation, purchasing, and process and for capturing and approving changes and modifications. Each department and functional area must, both proactively and through its safety assurance activities, ensure it identifies all change, evaluates it appropriately, and implements mitigations so that risk is managed to acceptable levels during and after the change. No operations may take place in the changed environment until the change is evaluated to determine the impact on safety and if there is increased safety risk, the risk must be mitigated to an acceptable level.

Several departments and functional areas have recognized the importance of Change Control Boards as a means to effectively document and review technological and service changes. As the associated documentation undergoes regular reviews as required by the department's QMP, the appropriate Safety Risk Management methodology is incorporated into the Boards' processes and decision-making criteria. Some of these documents are listed in the table below.

Dept	Document
<b>Information Technology</b>	<ul style="list-style-type: none"> <li>Change Control SOP, IT-QA-SOP-CCB-004</li> </ul>
<b>Infrastructure</b>	<ul style="list-style-type: none"> <li>Configuration Control Management, P/I 4.10</li> <li>Design Control Board, P/I 4.14</li> <li>Engineering Modification Instruction (EMI), SOP 114-02</li> </ul>
<b>Bus Maintenance and Engineering</b>	<ul style="list-style-type: none"> <li>Bus Change Control Board (BCCB), BUSV-BMNT-SOP-3.08-10</li> </ul>
<b>Rail Vehicle Program Services</b>	<ul style="list-style-type: none"> <li>Preparing, Processing and Approvals of Engineering Modification Instructions, SOP 202.01</li> <li>Preparing, Processing and Approvals of Engineering Change Notice, SOP 202.08</li> </ul>
<b>Communications &amp; Signaling</b>	<ul style="list-style-type: none"> <li>Systems Configuration Management Plan, SOP ATC-4000</li> </ul>



### 4.3 Continuous Improvement

Continuous Improvement is the process by which Metro examines its safety performance to identify safety deficiencies and carries out a plan to address them. It consists of formal activities designed to evaluate the effectiveness of the SMS in accordance with section 4.1.2 *Monitoring of Operational Safety Risk Mitigations* and QICO-PRO-P01 *Internal Safety Review Notification and Reporting Procedure*. The key objectives of Continuous Improvement are as follows:

- Identify proactively sub-standard safety performance
- Reveal the causes of sub-standard performance within the SMS
- Determine the implications of sub-standard performance of the SMS in operations and maintenance
- Eliminate or mitigate such causes

This process encompasses various critical elements, including the management of activities through the Safety Risk Management process, effective change management, compliance with relevant procedures, and conducting audits. Internal controls play a significant role in this process, with annual performance evaluations conducted before the revision process of the ASP begins. This enables performance measures, departmental targets, and safety objectives to be aligned with areas requiring improvement. Once deficiencies within the SMS are identified, corrective actions must be implemented.

### 4.4 Corrective Action Plans

By implementing corrective actions, Metro applies lessons learned to drive continuous improvement and risk mitigation. SARE-QUALITY-1.11 *Corrective Action and Preventive Action Procedure* identifies when CAPs are required, the procedure to develop them and the responsibilities to enforce and execute them. Under the direction of the Accountable Executive CAPs are also required to address safety deficiencies identified during safety performance monitoring from the sources identified in Section 4.1, Safety Performance Monitoring and Measurement or at the direction of the WMSC or FTA.

There are four (4) types of corrective action plans and/or mitigations at Metro:

1. **Corrective Action Plans (CAPs)** – WMSC, FTA or NTSB-issued findings require Metro to develop suitable CAPs. Within 30 days from the date the WMSC issues a finding or recommendation, Metro will propose a CAP; the Office of Quality Assurance, Internal Compliance and Oversight (Quality) manages the submittal process, which includes working with the responsible departments on developing a CAP and actionable items that address the finding or recommendation. For WMSC required CAPs, the WMSC will provide a response to the proposed CAP within 14 days, either approving the CAP or providing comments for adjustments. Metro will address any noted deficiencies within 14 days, followed by a 14-day WMSC response time. This process will continue until the CAP is approved by the WMSC. Metro will take the interim steps required to mitigate the risk and provide other safety improvements while CAPs are under development and review in coordination with Quality. These interim steps will be communicated to the WMSC.

Quality facilitates quarterly meetings with CAP owners to review and receive updates (meetings may occur more frequently as deemed necessary). These meetings may be attended by the WMSC; appropriate Metro representatives from Quality and operating departments will be present to discuss CAP implementation and provide any requested verification documentation to the WMSC. Additionally, Quality maintains a publicly available site where all CAP statuses are updated weekly: <https://www.wmata.com/initiatives/transparency/>.

2. **Internal Corrective and Preventive Action Plans (iCAPAs)** – Findings from the oversight activities of Quality’s Assurance Team and the Department of Safety require departments to develop iCAPAs.
3. **Recommended Corrective Actions (RCAs)** – When the Department of Safety’s Investigation Team performs an investigation in response to a Safety Event, Recommended Corrective Actions (RCAs) are developed in coordination with the responsible department that are designed to mitigate the risk of a re-occurrence. The RCAs are included in the Investigation Reports, which are submitted to the WMSC and subject to their review and adoption in accordance with the Program Standard. When a safety event warrants an expedited corrective action, the Department of Safety will collaborate with the impacted departments to mitigate the resulting risk. Within 24 hours of the immediate corrective actions, Metro will provide all information related to the urgent risk and the corrective action in accordance with notification requirements in the WMSC Program Standard. The required CAP elements, as listed in the WMSC Program Standard, are included.
4. **Risk Mitigations** – Proactive risk mitigations are developed in the course of the Safety Risk Management process described in Section 3.1, Safety Risk Management Process and are tracked and managed in Origami and monitored through the SMS Dashboard.

Every CAP requires coordination across relevant Metro departments to ensure all parties agree, to ensure successful implementation, and to avoid the introduction of unintended hazards.

## 5.0 Safety Promotion

The ultimate goal of Safety Promotion is to shape and reinforce the safety culture required to ensure the long-term, sustained effectiveness of SMS. The Safety Promotion component of Metro’s SMS has been designed to meet the requirements established by the FTA and WMSC, where applicable. In accordance with 49 CFR § 673.29 Safety Promotion includes:

- 5.1 Competencies and Training
- 5.2 Safety Communication

Additionally, the Safety Promotion segment of the SMS roadmap includes key programmatic milestones that have been prioritized to advance SMS development and implementation:

- Deliver SMS training to the workforce
- Design enhanced recognition program
- Complete Safety Culture Re-assessment
- Develop Employee Stress Management Plan for Critical Incidents
- Launch modernization of RWP training

### 5.1 Competencies and Training

Instruction in safe methods of operation and safety procedures is included in manuals, handbooks, and other documentation developed for the training and certification of operations and maintenance personnel. Each department has developed training systems that include in-house classroom training, on-the-job training, equipment safety training, and testing. Each department is responsible for establishing safety-training requirements in conjunction with the Department of Safety. The Department of Safety provides occupational and environmental safety training at the Carmen Turner Facility or Metro facilities and maintenance shops.

Managers are required to review training records periodically to ensure employees are in compliance with training and certification requirements. Employees have the responsibility to maintain a general awareness of the training associated with their occupation and overall understanding of their completion status. The Department of Safety evaluates departmental safety training programs and provides technical expertise and oversight as necessary. Identification of protective devices and emergency equipment is included in the training documentation and instruction.

Additionally, safety bulletins, notices, posters, and signage are used as appropriate to enhance safety awareness during all phases of system operations. Proficiency demonstrations and certifications are required of all operations and maintenance personnel. A comprehensive listing of safety-related classes may be found in Appendix D – Safety-related Training by Group.

### 5.1.1 Employee Safety Training

Metro continuously improves its comprehensive staff training program for operations and maintenance personnel. Specifically, Operations implements this training program in accordance with OPMS-001-11 *OPMS Standard Operating Procedures* and BTRA-BTRN-MAN01-00 *BUS Training Standard Operating Procedures*.

Safety training is conducted by multiple departments. Each department is responsible for establishing training requirements and assuring that the necessary training is accomplished. The following safety-related courses are provided:

- **New Employee Onboarding** – Employee onboarding is conducted for all new Metro employees to inform them of the agency’s current safety programs and procedures (e.g., safety reporting and emergency response awareness training).
- **First Aid and Cardiopulmonary Resuscitation (CPR) Training** – First Aid, CPR and Automatic External Defibrillator (AED) training is provided to station managers and other employees, as required by class specification. MTPD personnel receive this training at the Police Training Academy and refresher training during mandatory in-service retraining. The National Safety Council or other nationally accredited courses and instruction methodologies are used for First Aid, CPR, and AED training.
- **Special Safety Presentations** – Special safety training presentations are made at work locations to instruct employees on methods to help prevent traffic, passenger, and employee accidents.
- **Hazardous Materials/Hazard Communication Training** – All maintenance and support personnel who are required to use chemicals and hazardous or toxic substances are trained in the safe use of such substances. Employees who move to new positions are provided training in the use of any new chemicals that they may be assigned to use by the supervisor.
- **Bloodborne Pathogens training** – All employees identified in WMATA’s Bloodborne Pathogens Program as being reasonably anticipated to come in contact with blood or other potentially infectious materials as a result of occupational exposure.
- **Safety Related Operations and Maintenance Training** – Safety training is embedded in the technical and operations training courses provided to categories of employees including, but not limited to, train operators, bus operators, non-revenue (service) vehicle and equipment operators, maintenance of way employees, rail car maintenance employees, MICC personnel, engineering personnel, bus maintenance employees, and MTPD officers.
- **De-escalation training** – designed to reduce verbal confrontations and physical altercations, is administered by MTPD. Metro will expand its implementation of de-escalation training to include both operations and maintenance employees.

### 5.1.2 Safety Rules and Procedures Training

Metro personnel are trained to perform their work in accordance with the safety rules and procedures applicable to their office. The Department of Technical Training and Development provides job familiarization training to technical skills employees, which includes an overview of basic job safety and applicable rules.

#### *Roadway Worker Protection Training*

In an effort to further improve Metro's RWP training offering, the Departments of Safety and Technical Training will develop a plan to modernize RWP training *in 2024* and launch it the following year. The project seeks to re-imagine the methods of developing these skills through hands-on, scenario-based training that replicates real-life situations. The key activities involve incorporating on-the-job training and utilizing simulators to create realistic scenarios. This approach allows workers to actively engage in practical learning, make informed decisions, and assess risks in a controlled environment. By emphasizing hands-on training and immersive scenarios, the project aims to enhance worker skills and safety outcomes in RWP operations.

#### *Incident Response Training*

Emergency Preparedness Training – Front-line employees are provided training on the National Incident Management System through FEMA's NIMS 100 and 700 online courses. Employees who routinely interact with the public and could be a part of or discover an emergency situation are trained as Metro Incident Responders (MIR) under the IMF program. Personnel who could assume an incident command role within the Authority during an emergency are provided Metro Incident Commander (MIC) training as part of the IMF. This includes both didactic and live incident command simulation training.

Personnel from jurisdictional law enforcement, fire departments and transportation departments are provided training in their role to manage traffic and pedestrian flow in the event of a major Metrorail service delay and how to integrate into Metro's incident management system.

The impact of an incident can sometimes be felt for long after the immediate threat has passed. The intention behind the milestone *Develop an Employee Stress Management Plan for Critical Incidents* is to establish a comprehensive framework to support and assist employees in managing stress and emotional challenges resulting from critical incidents. The key activities of this project involve conducting a thorough assessment of potential stressors and identifying strategies and resources to address and mitigate the impact of critical incidents on employee well-being. This includes developing protocols for early intervention, providing access to counseling services, organizing workshops or training sessions on stress management techniques, and fostering a supportive work environment that encourages open communication and peer support. By implementing this plan, the organization aims to promote the mental health and resilience of its employees, ensuring their well-being during and after critical incidents.

#### *Industrial Hygiene and Occupational Safety and Health Training*

Employees who use or come in contact with chemical, physical or biological hazards receive training in hazard mitigation, industrial hygiene principles and in the care and use of personal protective equipment. Department of Safety provides training in the proper handling of biologically contaminated materials such as tools, syringes and clothing.

The following required training topics are identified as required by employee position descriptions and work assignments, among others as required:

- Asbestos Awareness
- Bloodborne Pathogens
- Aerial Lifts
- Confined Space Entry

- Cranes
- Electrical Safety
- Environmental Compliance Officer
- Fall Protection
- Fire Extinguisher Training
- First Responder – Operations
- Hazard Communication
- HAZWASTE Management
- Hearing Conservation
- Lead Awareness
- Lockout/Tagout
- Permit Required Confined Space
- Personal Protective Equipment
- Powered Industrial Truck
- Powered Work Platforms
- Respiratory Protection
- Silica Awareness
- Silica Competent Person

### 5.1.3 Contractor Safety

Contractors are responsible for ensuring compliance with the U.S. Department of Labor Occupational Safety and Health Administration (OSHA) standards, Metro requirements, and applicable Occupational Safety and Health statutes and regulations of the District of Columbia, State of Maryland, Commonwealth of Virginia, or political subdivision in which the work is being performed.

Contractors who perform work on, or interface with the operating system, are required by contract to verify that supervisors and assigned employees attend contractor RWP training. Each contract also requires compliance with applicable Federal and state Occupational Safety and Health regulations.

Contractors must submit to project management all required safety training certifications and documentations of course completion that are pertinent to the work to be performed under the contract. Operations Safety Oversight Safety Specialists perform regular safety inspections and audits of contractor work sites to assess contractor safety compliance, and they may review training documentation. Following their inspection, Safety Specialists prepare an inspection report documenting deficiencies identified during the inspection. This report is transmitted to the contractor and metro project management personnel associated with the project. Deficiencies noted are tracked in the Safety Inspection Application and Safety Specialists work with contractor personnel to resolve. Data from these inspections is monitored for trends by the Office of Safety Data Analytics and hazards are created, mitigated, and monitored when appropriate.

The contractor must submit a construction safety plan to Metro's Contracting Officer Technical Representative (COTR) or their delegate for review prior to commencement of work. The contractor must, within five (5) days after receipt of Notice to Proceed, submit through Metro's COTR or their delegate to the Department of Safety, a request to schedule and conduct the Contractor Roadway Worker Protection (CRWP) training for all contract personnel who will be engaged in the performance of contract work on or above the roadway.

CRWP training and qualification must be renewed annually. The contractor must not perform work at the contract site(s) on or above the Roadway, until all personnel of the contract work force are CRWP trained and qualified. The contractor must also follow all applicable rules and procedures while working in the operating rail system. Other training may include, but not be limited to, Confined Space training. Additional contractor requirements may be found at the Construction Safety and Environmental Manual located on the Department of Safety intranet site.

### 5.1.4 Training Recordkeeping

Training records are maintained in an Enterprise Learning Management (ELM) system that is available to WMATA supervisors and employees. The course owners (i.e., those giving the course) are responsible for updating and maintaining their training rosters in this database.

### 5.1.5 Compliance with Training Requirements

Training requirements for each position and employee are included in ELM. Audits can be performed using the database to review training records of individual employees to determine compliance with training requirements. Per the QMSP, each department head or their designee's responsibility is to develop and maintain a required training matrix for each position and employee within their department and to verify that the matrix is updated and maintained. Periodic notifications are sent to supervisors if required courses are not completed within the required period.

### 5.1.6 SMS-specific Training Requirements

Metro has identified the following SMS training for employees:

- Individuals directly responsible for safety must meet the requirements of 49 CFR Part 672, the Public Transportation Safety Certification Training Program (PTSCTP), including a 2-year refresher training interval. These individuals are those whose primary job function includes the development, implementation, and review of the ASP, 49 CFR Part 672 requirements, or WMSC requirements.

This group includes the EVP/CSRO, SVP/ACSO, Senior Director of Safety Assurance, Senior Director of Safety Risk Management, Deputy Chief of Safety Certification and Engineering, and the VP of Quality Assurance, Internal Compliance and Oversight.

- SRCs are present at the facility and departmental level and are designated to support the Accountable Executive and CSRO in implementing this ASP. These individuals are identified in Appendix D by job title. Recommended training for SRCs includes: One-hour course on SMS Awareness (FTA/TSI e-Learning); Two-hour course on SMS Safety Assurance (FTA/TSI instructor-led Virtual Live Training) and a 20-hour course on SMS Principles for Transit (FTA/TSI, instructor-led). The one-hour course on SMS Awareness (FTA/TSI e-Learning) must be completed within 12 months of designation or hire. Instructor-led training is contingent upon class availability by TSI. The Safety Risk Management team offers initial trainings for newly hired SRCs on principles of SMS, Metro's safety risk management processes, and Safety Committee facilitation. These trainings are archived and available as guidance on the SRC Hub, an SRC resource page on the Department of Safety's Metroweb site. SRCs receive hands-on coaching and mentorship from the Department of Safety's Safety Risk Management Team.
- SMS training for managers and employees will be developed by incorporating lessons learned to improve upon the training piloted with the ROCC. Initial training was developed and launched in 2023 and will continue to be implemented over the course of 2024 (to include contractors and a plan for refresher training). The content of this training includes:
  - Overview of the four components of SMS
  - Required notifications reflected in the WMSC Program Standard
  - Safety Event Reporting and Investigations
  - Close Call and Employee Safety Reporting
  - SMS Dashboard Access and Usage
  - SRCs and Submitting Risks
- As noted in Section 4.1.2, the triennial internal safety review program is executed per the requirements of by 49 CFR 674.27(a)(4). The training requirements for personnel conducting triennial Internal Safety Review includes: One (1) hour course on SMS Awareness (FTA/TSI e-Learning); Two (2) hour course on Safety Assurance (FTA/TSI instructor-led Virtual Live Training)



and a 20-hour course on SMS Principles for Transit (FTA/TSI, instructor-led). The (1) hour course on SMS Awareness (FTA/TSI e-Learning) must be completed within 12 months of designation or hire.

## 5.2 Safety Communication

Effective safety communication is one of the foundational philosophies of SMS. Its purposes are to:

- Ensure that personnel are aware of the SMS;
- Convey safety-critical information;
- Explain why particular safety actions are taken;
- Explain why safety procedures are introduced or changed; and
- Provide feedback and updates on employee-reported hazards and safety concerns.

The primary safety communication responsibility of senior executive team at Metro under the requirements of 49 C.F.R § 673.23(c) is to actively and personally communicate the Safety Management Policy to employees and contractors. Any changes to the Safety Management Policy must be approved and distributed by the senior executive team to employees. This is primarily implemented through the committee process, but every executive is also required to visibly endorse the Safety Management Policy to employees in the area they control.

### 5.2.1 Direct Staff communication

The primary safety communication methods include Safety Alerts and Safety Bulletins, print and digital signage, collateral material, videos, webinars, and Department of Safety team communication with stakeholders. Additionally, Department of Safety partners with the Department of Customer Service, Communications and Marketing (CSCM) to integrate safety messaging into corporate communications and initiatives. The Department of Safety has a recurring section in Metro's biweekly staff newsletter, *MetroVoices Wire*, and participates in corporate promotional awareness campaigns. Additionally, the Department of Safety partners with Operations to share information (such as Safety Bulletins, Safety Alerts, Operating Practices Advisories, etc.) to use as part of Toolbox Talks, Safety Briefings, Safety stand-downs, manager/supervisor interactions, and daily meetings.

#### 2024 Milestones

Two high-profile activities in 2024 seek to reach all members of Metro's workforce with the messages of leadership's commitment to improving our safety performance and our safety culture. The milestone *Design Enhanced Recognition Program* aims to acknowledge and appreciate employees who consistently demonstrate exemplary safety practices. The program will be a comprehensive recognition program that identifies and rewards employees for their commitment to safety. This includes establishing criteria and guidelines for the selection of safety awards, creating a nomination and evaluation process, and determining appropriate recognition mechanisms such as certificates, plaques, or monetary incentives. The program will also involve promoting awareness and participation among employees, ensuring transparency and fairness in the selection process, and periodically evaluating the effectiveness of the program to make any necessary adjustments. By implementing this program, Metro aims to motivate and incentivize employees to prioritize safety in their daily work activities and contribute to a safer work environment for everyone.

The second project in 2024 is the *Safety Culture Re-Assessment*. MITRE conducted the baseline cultural assessment in 2022, reaching 2,218 employees and contractors (20% of the workforce) and gathering their views on leadership's commitment to safety, the effectiveness of reporting programs and other key topics. The full results of the assessment are available on the Department of Safety's site on

Metroweb. This second iteration of the survey seeks to measure the impact of Metro's SMS implementation activities on our safety culture.

### 5.2.2 Hazard and Safety Risk Information

The activities detailed above to identify, mitigate and track risks would serve little purpose if they were not effectively communicated to Metro personnel. Promotional activities are embedded into the Voluntary Safety Reporting Program, SRC development and Safety Committees.

The SMS Dashboard is the main vehicle for consolidating and communicating safety hazard and risk information across the Authority. Once a risk has been entered into Origami by departmental SRCs, it reflects on the SMS Dashboard, where front-line personnel can see applicable mitigations that are in place or being implemented to address their concerns. FSCs and DSCs utilize the SMS Dashboard to track mitigations and identify mitigations that need additional attention and effort. The ESC utilizes the SMS Dashboard to monitor the overall Metro Risk Profile. In addition, the ESC monitors past due mitigations and changes in risk ratings to identify where additional resources and funding need to be allocated.

#### *Hazardous Materials*

Maintenance and support personnel who handle chemicals and hazardous substances undergo comprehensive training to ensure their safe usage. Whenever employees transition to new positions, they receive training on the proper handling of any new chemicals assigned to them by their supervisors. The Department of Safety holds the responsibility of developing procedures that guarantee compliance with the OSHA Hazard Communication Standard and implementing the safety assurance process for hazardous materials.

To support these efforts, the SOP, *Hazard Communication Program* (4404-2-01) incorporates the review process of the Globally Harmonized System Safety Data Sheets (SDS). Before any chemicals or hazardous materials are used or tested by Metro employees or contractors within the Metro operating system, the Department of Safety evaluates and approves them in line with the Hazard Communication Program.

The procurement of chemical products necessitates the prior review and written approval from the Department of Safety. This includes purchases made through blanket orders, purchase cards, construction specifications, or equipment specifications. The Department of Procurement and Materials handles procurement requests for chemical products only when they possess written approval from the Department of Safety and an assigned SDS number for that specific product. Furthermore, the Procurement Department implements quality control procedures to ensure that receiving storerooms exclusively accept chemicals and hazardous materials that have been reviewed, approved, and assigned a unique SDS number by the Department of Safety. Any substitutes for chemical products and hazardous materials must receive approval from the Department of Safety before purchase.

In the case of Metro contracts, contractors must submit chemical products intended for use on Metro property to the Department of Safety for evaluation before their utilization. The Metro project manager or their delegate is responsible for providing the contractor with the SDS Approval/Rejection packages, which they must adhere to. Users of approved products must read and comply with the Evaluation/SDS Approval document before using the product, following all instructions and precautions. Department of Safety may also conduct site visits at locations where chemicals are used to ensure that workers are aware of the associated hazards and are using appropriate personal protective equipment. Approved SDSs are accessible through the Department of Safety's intranet page, while departments with employees utilizing hazardous materials may provide links to the SDS application on their respective departmental intranet pages.



### 5.2.3 Employee Safety Reporting Program Engagement

If employees use the Metro Hazard Submission Form, the report goes directly to the SRC who schedules a follow-up with the employee (provided the employee did not choose to remain anonymous). If any other reporting mechanism is used as described in section 2.2 *Employee Safety Reporting Program*, Department of Safety responds to safety-related reports received and shares outcomes directly with employees and contractors, through employee communications (such as articles in MetroVoices Wire Newsletter, Safety Bulletins, and Safety Alerts), on the Department of Safety page of the Metroweb, and through other safety promotional campaigns. Additionally, as Metro's SMS matures, the interactive SMS dashboard will provide employees with information on the risks being actively managed, status of corresponding mitigations, metrics that measure effectiveness, and the ability to report concerns or provide feedback. The dashboard launched in 2021 and gets updated as departments implement SMS Safety Risk Management as reflected in Section 3.0 *Safety Risk Management*.

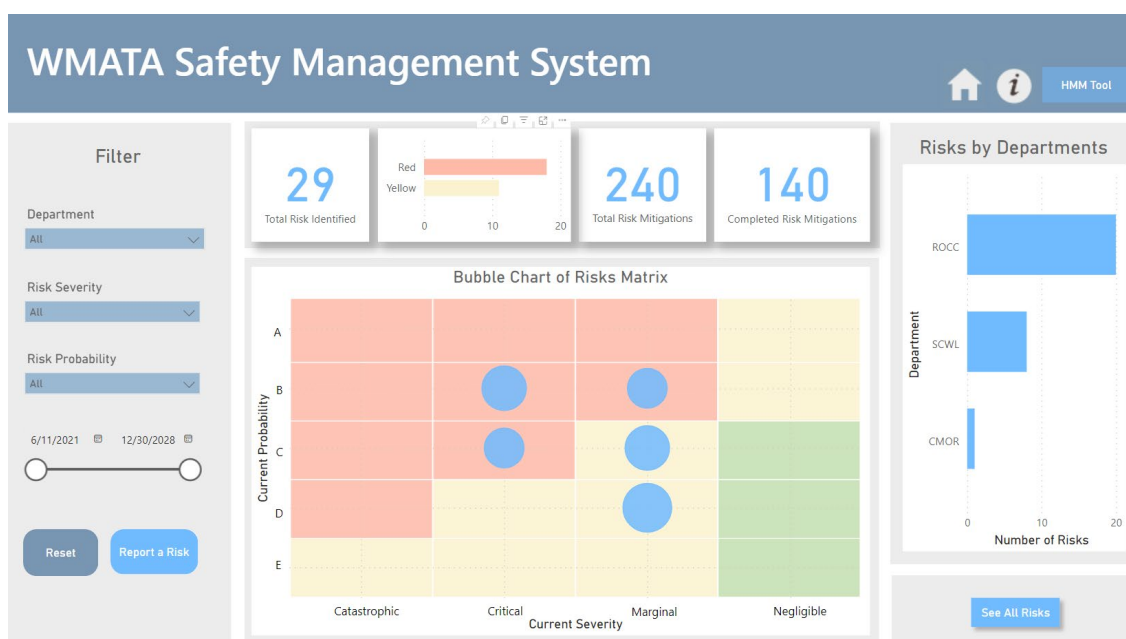


Figure 4. SMS Dashboard

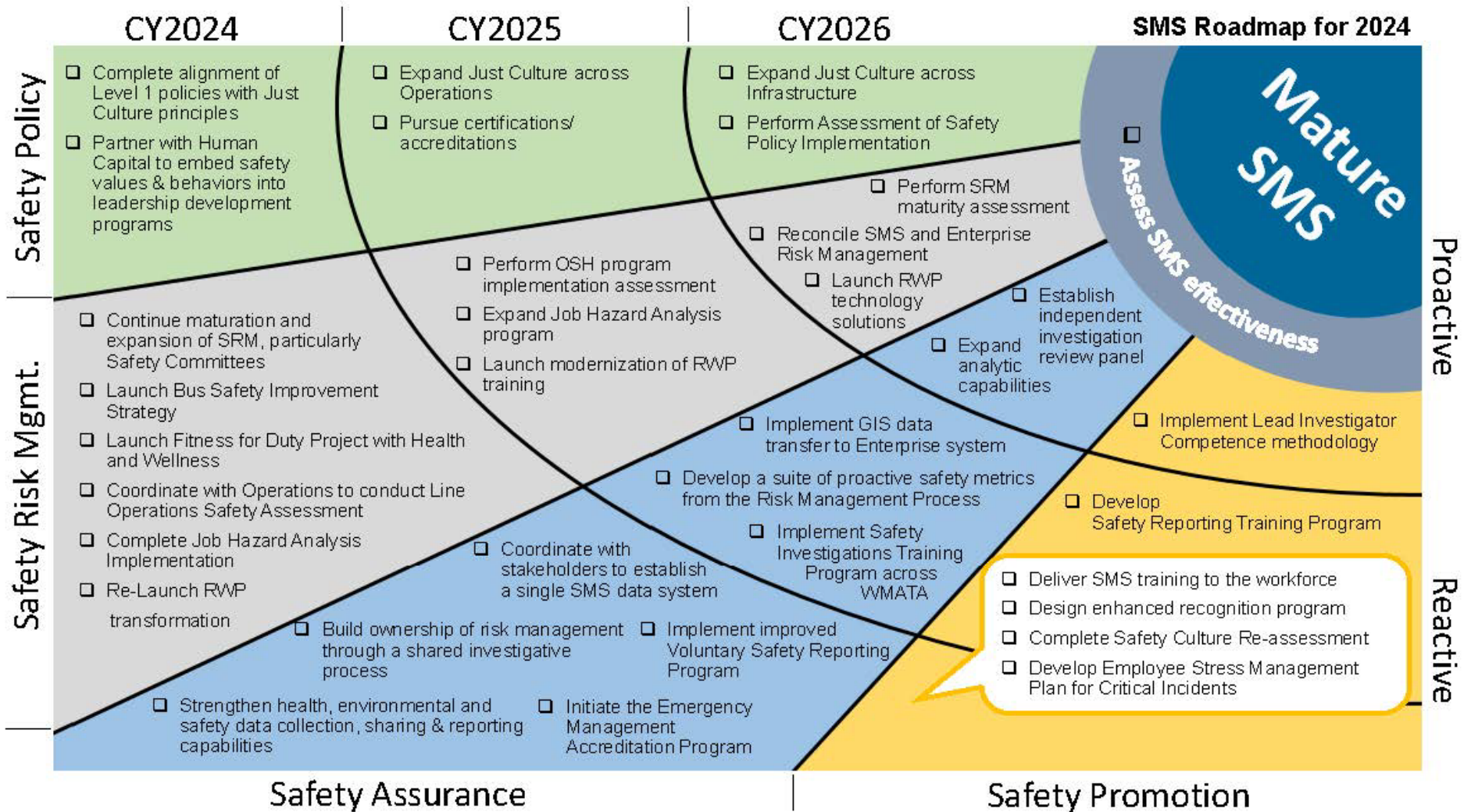
## 6.0 Documentation

In accordance with 49 C.F.R. § 673.31 Safety plan documentation, Metro retains all documentation associated with the development and implementation of its SMS for a minimum of three years. The governance standard of Metro's controlled documents is established by P/I 1.1 *Document Governance and Hierarchy* and the QMSP; the Department of Safety has identified the procedures and location of SMS documentation in its Document Control Procedure – 0010-3-01 and its Record Retention Process – 0020-3-01. This ASP and key SMS documentation are made available to all Metro personnel on its intranet through the *MetroDocs site on Metroweb*.

All the documentation referenced in the ASP is considered SMS documentation and has been provided to the WMSC as part of the ASP annual review and when requested. In accordance with WMSC's Program Standard:

- Not less frequently than every three months, Metro issues a notification to all Metro officials, employees, consultants, and contractors directing all such personnel to cooperate and respond immediately to requests made by WMSC personnel and to promptly provide any requested information directly to the WMSC.
- Metro includes this notification as part of every new employee on-boarding. For contractors, Metro includes this notification to the contractor in each authorization to begin work.
- In addition, Metro must not retaliate against any official, employee, consultant, or contractor who interacts with the WMSC. Metro may not proscribe or otherwise discourage communication, cooperation, or the sharing of information with the WMSC. This is also conveyed in the notification.
- Metro will also cooperate and respond immediately to provide information to Federal entities (DOT, FTA, NTSB, etc.) upon request.

## Appendix A – SMS Strategic Roadmap



## Appendix B – Definitions

*Accident* means an event that involves any of the following:

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

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

*Administrator* means the Federal Transit Administrator or the Administrator's designee.

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

*Corrective action plan* means a plan developed across the agency that describes the actions the Rail Transit Agency will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Rail Transit Agency to develop and carry out a corrective action plan.

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

*Event* means any Accident, Incident, or Occurrence.

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

*Incident* means an event that involves any of the following:

A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

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

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

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

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

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

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

*Person* means a passenger, employee, contractor, consultant, pedestrian, trespasser, or any individual on the property of a rail fixed guideway public transportation system.

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

*Public Transportation Safety Certification Training Program* means 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 in accordance with 49 U.S.C. 5329(c)(2), or the program authorized by 49 U.S.C. 5329(c)(1).

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

*Rail Transit Agency* means any entity that provides services on a rail fixed guideway public transportation system.

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

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

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

*Safety Critical Item* means any component of an asset containing a characteristic where the failure, malfunction, or absence of which could cause:

- i. A catastrophic or critical failure resulting in loss of, or serious damage to, a major asset or infrastructure; or
- ii. An unacceptable risk of personal injury or loss of life.

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

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

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

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

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

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

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

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

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

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

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

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

*Vehicle* means any rolling stock used on a rail fixed guideway public transportation system, including but not limited to passenger and maintenance vehicles as well as buses, and automobiles used for paratransit services.

## Appendix C – Acronyms

<b>ACSO</b>	Assistant Chief Safety Officer
<b>AED</b>	Automatic External Defibrillator
<b>ASP</b>	Agency Safety Plan
<b>C3RP</b>	Confidential Close Call Reporting Program
<b>CAP</b>	Corrective Action Plans
<b>CBT</b>	Computer-Based Training
<b>CCTV</b>	Closed-Circuit Television
<b>CEO</b>	Chief Executive Officer
<b>CFR</b>	Code of Federal Regulations
<b>CIPSEA</b>	Confidential Information Protection and Statistical Efficiency Act
<b>COO</b>	Chief Operations Officer
<b>COTR</b>	Contracting Officer Technical Representative
<b>CPR</b>	Cardiopulmonary Resuscitation
<b>CRWP</b>	Contractor Roadway Worker Protection
<b>CSCM</b>	Office of Customer Service, Communications & Marketing
<b>CSRO</b>	Chief Safety and Readiness Officer
<b>DC</b>	District of Columbia
<b>DOT</b>	U.S. Department of Transportation
<b>DSC</b>	Departmental Safety Committee
<b>ELM</b>	Enterprise Learning Management
<b>EOP</b>	Emergency Operations Plan
<b>ESC</b>	Executive Safety Committee
<b>EVP</b>	Executive Vice President
<b>FSC</b>	Facility Safety Committee
<b>FTA</b>	Federal Transit Administration
<b>GIS</b>	Geographic Information System
<b>GM</b>	General Manager
<b>iCAPA</b>	Internal Corrective and Preventive Action Plans
<b>IIJA</b>	Infrastructure Investment and Jobs Act
<b>IMF</b>	Incident Management Framework
<b>JHA</b>	Job Hazard Analysis
<b>JLMSC</b>	Joint Labor and Management Safety Committee
<b>KPI</b>	Key Performance Indicator
<b>MAC</b>	Mission Assurance Coordinator
<b>MICC</b>	Metro Integrated Command & Communications Center
<b>MIR</b>	Metro Incident Responders
<b>MOA</b>	Memoranda of Agreement
<b>MOR</b>	Metrorail Operating Rules
<b>MOU</b>	Memoranda of Understanding
<b>MTPD</b>	Metro Transit Police Department
<b>MWCOG</b>	Metropolitan Washington Council of Governments

<b>NIMS</b>	National Incident Management System
<b>NTD</b>	National Transit Database
<b>NTSB</b>	National Transportation Safety Board
<b>OEP</b>	Office of Emergency Preparedness
<b>OHAW</b>	Office of Occupational Health and Wellness
<b>OIG</b>	Office of Inspector General
<b>OSHA</b>	Occupational Safety and Health Administration
<b>P/I</b>	Policy/Instruction
<b>PTASP</b>	Public Transportation Agency Safety Plan
<b>PTSCTP</b>	Public Transportation Safety Certification Training Program
<b>QMP</b>	Departmental Quality Management Plan
<b>QMSP</b>	Quality Management System Plan
<b>RCA</b>	Recommended Corrective Action
<b>ROCC</b>	Rail Operations Control Center
<b>RRC</b>	Response and Recovery Coordination
<b>RSSC</b>	Rail Safety Standards Committee
<b>RWP</b>	Roadway Worker Protection
<b>SARA</b>	Scanning, Analysis, Response, Assessment
<b>SDS</b>	Safety Data Sheets
<b>SME</b>	Subject Matter Expert
<b>SOP</b>	Standard Operating Procedure
<b>SRC</b>	Safety Risk Coordinator
<b>SRM</b>	Safety Risk Management
<b>SSOA</b>	State Safety Oversight Agency
<b>SVP</b>	Senior Vice President
<b>TAM</b>	Transit Asset Management Plan
<b>TSI</b>	Transportation Safety Institute
<b>TSSP</b>	Transit Safety and Security Program
<b>VRM</b>	Vehicle Revenue Miles
<b>WMATA</b>	Washington Metropolitan Area Transit Authority
<b>WMSC</b>	Washington Metrorail Safety Commission



## Appendix D – Safety-related Training by Group

### The Department of Safety (provided or outsourced)

- Asbestos Awareness
- Bloodborne Pathogens
- Body Mechanics
- Compressed Gas Safety
- Confined Space Entry
- CPR/AED/First Aid
- Crane, Derrick, and Hoist Safety
- Crawler, Locomotive, and Truck Cranes
- Defensive Driving
- Electrical Safety Work Practices – Awareness
- Electrical Safety Work Practices – Qualified Person
- Emergency Action Plan
- Emergency Response Operations Level
- Employee Alarm Systems
- Environmental Compliance Officer, Deputy Compliance Officer
- Fall Protection
- Fire Extinguisher
- Fire Extinguisher Awareness
- Fire Prevention Plan (Fire Watch)
- Fixed and Portable Ladders
- Hand and Portable Power Tools
- Hazard Communication
- Hazardous Waste Management
- Hearing Conservation
- Hot Work Permits, Welding and Cutting
- Housekeeping
- Incident and Injury Investigations
- Incident Management Framework
- Lockout/Tagout
- Machine Guarding
- Manlifts/Aerial Lifts
- New Employee Orientation – Safety
- OSHA 30 Hour for General Industry
- OSHA 10 Hour Construction
- OSHA 10 Hour General Industry
- OSHA 30 Hour for Construction
- Personal Protective Equipment
- Pesticide Safety
- Power Presses (Mechanical and Hydraulic)
- Respiratory Protection
- Safety Management Systems – Agency Safety Plan
- Safety Measurement Systems – Data Management
- Safety Observations
- Scaffolding
- Slings
- Storage and Handling of Flammable and Combustible Liquids

### Rail Operations Quality Training

- Interlocking Operations Training
- Line Platform Instructor Training / Refresher
- Rail Operations Supervisor
- Rail Traffic Controller Training
- Station Manager Training
- Train Operations Training

### Bus Operations Training

- Bus and Rail Assault Response
- Bus Maintenance SOP NPB Training
- Bus Operator Back-To-Bus Training
- Bus Operation Essential Supervisor Refresher Training
- Bus Operator Quality Assessment Refresher Training
- Bus Operator Refresher Training
- Bus Training & Safety Instructor Training
- Commercial Driver's License (CDL) Training
- Defensive Driving for Bus Maintenance Mechanics
- Defensive Driving for Non-Revenue
- DriveCam Coaching Training
- Line Platform Instructor Training / Refresher
- Mechanical Commercial Driver's License Training
- New Bus Operator Candidate Training Course (NPB)
- Remedial/Post-Accident Bus Operator Training

### Bus Maintenance Training

- Bloodborne Pathogens
- Brakes 302 MAN Drum
- Brakes 303 Meritor Disc
- Brakes 304 Meritor Drum
- Compressed Natural Gas CBT
- Driver Safety
- Fall Protection
- Fire Suppression CBT
- Forklift
- Hybrid CBT
- Lockout Tagout
- MAN Disc
- Pneumatics
- Service Lane
- Steering Suspension

### Technical Skills and Maintenance Training – RWP

- General Track Access and Roadway Safety
- Initial RWP – A
- Initial RWP – B
- Initial Crew Watchperson / Advanced Watchperson
- Recurrent General Track Access and Roadway Safety CBT

- Recurrent RWP – A
- Recurrent RWP – B
- Recurrent Crew Watchperson / Advanced Watchperson

#### **Technical Skills and Maintenance Training – ELES**

- Advance Level Controllers
- Advance Level Electrical/Electronic Systems)
- Basic Mechanical Theory & Applications / 111a
- Basic Radio Communications
- Customer Service/101C
- Electrical I – AC Fundamentals / 109
- Electrical I – DC Fundamentals / 108
- Elevator Doors
- Elevator-Inspection & Basic Maintenance/219
- Elevator-Other Systems/220 (Includes NAESA Exam)
- Elevator-Principles of Operations / 213
- Escalator-Principles of Operation/208
- Hydraulic Theory & Applications / 110
- Kone Escalators Model Trans-180
- Mathematics Review/104
- Maxton Control Valve and Adjustments
- Overview of Vertical Transportation/200
- Safety, First Aid, CRP AED 102A&B
- Study Skills /101B
- Tools and Material Handling / 103
- TSMT Orientation/101A

#### **Technical Skills and Maintenance Training – COMM**

- CCTV/DVR Fundamentals
- Honeywell Vista - 128BPT
- Passenger Information Display System
- Public Address Systems
- RAMEX PERS/INTERCOM
- Swing Gate Training
- Networking Principles
- Comprehensive Radio Communications 490 MHz

#### **Technical Training – PLNT**

- AC Fundamentals
- Basic Mechanical
- Basic Motor Controls
- Cleaning for Health / Green Cleaning
- DC Fundamentals
- Floor Cleaner Operations
- High Voltage Self Awareness
- HVAC Certification
- Introduction to Custodial Training
- Ladder & Scaffolding Initial Training
- Overview Drainage Pumping Stations
- Powered Industrial Trucks
- Small Engine Repair
- Tunnel Fan PMI

- Drainage Pumping Station

#### **Technical Training – AFC/PLE**

- Introduction to Automatic Fare Collection
- Introduction to Parking Lot Equipment
- Introduction to SOC
- Dulles Faregates
- STraffic Faregates I
- STraffic Faregates II
- AC / DC Fundamentals
- Vender Machine Refresher

#### **Technical Skills and Maintenance Training – ATC**

- 10-day phase 3 Track circuit logics
- 15-day phase 2 Track circuits
- ATC Informational and Training Session
- ATC Journeyman 10-Day Phase 1 Intro to ATC
- Automatic Train Control On-the-Job Training
- Baseline Track Circuit and Wayside
- CAB Signal Level ATC Platform and Spillover Measurement
- GM 4000 intro and Switch Adjustments
- M3 switch - Adjust, Maintain, Troubleshoot
- OJT Mentor Training
- Phase 4 Switches - 15 day
- Phase 5 Data Transmission
- Practical test prep

#### **Technical Skills and Maintenance Training – TRST**

- Aspen Aerial
- Ballast Regulator Knox Kershaw Operator
- Basic Laborer Training
- Basic Rigging
- Basic Training Vehicle Flag Person
- Bridge Inspection Refresher Training
- Building Condition Assessment Training
- De-icer Flatcars-RCC and Plasser DI-40
- Equipment Flag Person Exam
- Equipment Operator Exam
- Equipment Operator Recertification Training
- Equipment Operator Refresher
- Flag Person Recertification
- Frog Welding
- Gauge Rods
- Geismar Operator Training
- Hi-Rail Bridge Lift (Scissor) Truck (22501)
- Hi-Rail Bridge Lift (Scissor) Truck (22504)
- Hi-Rail Bridge Lift (Scissor) Truck 248/260
- Hi-Rail Bridge Lift Truck-Vendor
- Hi-Rail Gear Utility Truck (21587)
- Initial Equipment Operator Training
- Initial Track Inspection Training



- Initial Track Inspector Training – Vendor
- Maryland DOT Traffic Control
- NORDCO Bundle
- Plasser PMC-50
- Plasser Tamper 4x4 Operator
- PM SV01&02
- Reinstruction for TRST Employees
- Re-Instruction TRST
- Safety Inspection of in-Service Bridges 130055
- Scissor Lift Truck
- Silica Power Air Purified Respirator Training
- Snowplow
- String Lining and Combination Gauge & Level
- TGV Operation and Maintenance
- Thermite Welding – Vendor
- Track Charts
- Track Inspection Recertification Training
- Track Repairer 1
- Tunnel Safety Inspection FHWA-NHI-130110
- Vacuum Truck 21588-589
- Forklift Training
- Manlift Training
- Skid steer Training

#### **Technical Training – CMNT**

- 7K Back to Back Measurements
- 7K Sub-System Electrical
- 7K Sub-System Mechanical
- 7K System Introduction and Troubleshooting
- 7K Trucks/Couplers
- HVAC EPA 608-609
- HVAC Fundamentals Refresher
- HVAC Refresher Training
- MRO Refresher Training
- Preventive Maintenance Electrical 2/3/6/7/K
- Preventive Maintenance Mechanical 2/3/6/7/K
- QA/OJT
- Rail Car Daily Inspection 2/3/6/7 K
- S&I Refresher Training
- Train Movement In to/Out of CMNT Shops
- Wheel Lathe

#### **Technical Training – ROCC**

- MOC Initial Training
- MOC Skills Drills
- MOC Recertification

#### **Power Operations Center Training (PWOC)**

## Appendix E – JLMSC ASP Approval Record

### Voting Results of Metro's 2024 ASP

JLMSC Member	Voting Result
Amalgamated Transit Union Local 689 (ATU L-689)	Approve
Fraternal Order of Police (FOP)	Approve
International Brotherhood of Teamsters Local 922 (IBT L-922)	Approve
Office of Professional Employees International Union (OPEIU) Local 2	Approve
Teamsters Local 639	No Vote
Operations Bus	Approve
Operations Rail	Approve
Digital Modernization	Approve
Safety and Readiness	Approve

## Appendix F – PTASP General Manager Certification



### PUBLIC TRANSPORTATION AGENCY SAFETY PLAN CERTIFICATION

I, Randy S. Clarke, General Manager and Chief Executive Officer, have reviewed the Public Transportation Agency Safety Plan (PTASP) and certify that the safety plan is satisfactory and complies with each of the requirements of the PTASP rule (49 CFR Part 673) and that the safety plan effectively will guide WMATA with the management of safety risks of the rail and bus operations of the Authority.

Date: September 2023

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Randy S. Clarke  
General Manager and  
Chief Executive Officer

**Washington  
Metropolitan Area  
Transit Authority**

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*A District of Columbia,  
Maryland and Virginia  
Transit Partnership*

## Appendix G – WMATA Board Resolution Record

## Appendix H – PTASP SSOA Certification

## Appendix I – ASP Revision History

Section	Description of Change
<b>Version 1.0,</b> Oct 8, 2021	
Entire Document	Initial release
<b>Version 2.0,</b> Dec 31, 2021	
Executive Summary	New section
Entire Document	Improved organization, Incorporated the SMS Strategic Roadmap
<b>Version 3.0,</b> Dec 31, 2022	
Safety Management Policy Letter	Replaced executive summary
1.1 Transit Agency Information	Updated to reflect new headquarters address and new GM
1.3.1 Infectious Disease Mitigation	New sub-section, added to meet the new requirements introduced by the Infrastructure Investment and Jobs Act
1.4 Safety Performance Targets	Updated to reflect refreshed targets and meet the new requirements introduced by the Infrastructure Investment and Jobs Act
1.5 Development and Implementation of a Safety Management System	Refreshed to introduce the latest SMS Strategic Roadmap
2.0 Safety Management Policy	Updated to reflect the priorities outlined in the SMS Strategic Roadmap.
2.1 Safety Management Policy Overview	Added language to explain the establishment of the Metro's safety policy as a standalone document.
2.1.1 Safety Management Policy Statement	Updated to reflect new GM/CEO.
2.2 Employee Safety Reporting Program	Updated to reflect Metro's partnership with MITRE to advance Employee Safety Reporting.
2.3 Communication of the Safety Management Policy	Update to reflect the strategy for communicating the safety management policy statement.
2.4.2 SMS Executive	Updated to reflect the latest version of SAFE's planned organizational future state
2.4.3.1.1 Rail Services	Updated to include the recently established Power Operations Center
2.4.2.1.2 Bus Services	Updated to refresh content on bus services.
3.0 Safety Risk Management	Updated to reflect the priorities outlined in the SMS Strategic Roadmap.
3.1 Safety Risk Management Process	Updated to reflect the latest priorities for Safety Risk Management rollout and the role of the JLMSC, which has been established to meet the requirements introduced by the Infrastructure Investment and Jobs Act.
3.2.1 Occupational Safety and Health Risk Management	New sub-section added.
3.2.2 Operational Safety Risk Management	New sub-section added.
3.2.3 Roadway Worker Protection	New sub-section added.
3.2.4 Safety Certification	New sub-section added.

3.2.5 Security Risk / Threat Analysis	New sub-section added.
4.0 Safety Assurance	Updated to reflect the priorities outlined in the SMS Strategic Roadmap.
4.1 Safety Performance Monitoring and Measurement	Update to reflect the progress made to develop the Operations Safety Oversight team.
4.1.3 Safety Investigations	Updated to reflect the progress made to establish an incident management framework, mature mission assurance coordinator and primary responder functions, and expand the investigations team capacity.
4.4.1 Employee Safety Reporting Corrective Action Plan	New sub-section added.
5.0 Safety Promotion	Updated to reflect the priorities outlined in the SMS Strategic Roadmap.
5.1.1 Employee Safety Training	Updated to reflect progress toward developing an SMS Communications, Training, and Engagement strategy.
5.2 Safety Communication	Updated to reflect strategy with MITRE.
Appendices A and C	New appendices.
<b>Version 4.0,</b> Dec 31, 2023	
Safety Management Policy Letter	Updated to reflect new leadership commitment.
1.0 General Requirements	Updated to reflect ASP meets all requirements of FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.
1.1 Transit Agency Information	
1.2 Plan Development, Approval, and Updates	Updated to include process for management of changes affecting roles and responsibilities described in ASP.
1.3 Emergency Preparedness and Response Plan	Updated to reflect Pandemic Response Plan is consistent with applicable guidelines and regulations.
1.3.1 Infectious Disease Mitigation	
1.4 Safety Performance Targets	
1.4.1 Safety Performance Target Setting Methodology and Timeline	
1.4.2 Safety Performance Targets	Sub-headings removed, streamlined for readability, targets updated.
1.4.3 System Reliability Targets	Targets updated.
1.5 Risk Reduction Program	New section.
1.5.1 Visibility for Bus Operators	New section.
1.5.2 Transit Worker Assaults	New section.
1.6 Development and Implementation of a Safety Management System	
2.0 Safety Management Policy	
2.1 Safety Management Policy Statement	
2.2 Employee Safety Reporting Program	

2.3 Communication of the Safety Management Policy	
2.4 Necessary Authorities, Accountabilities, and Responsibilities	Updated to reflect organizational realignment announced December 2022.
2.4.1 Accountable Executive	
2.4.2 SMS Executive	Updated to reflect organizational realignment announced December 2022.
2.4.3 Agency Leadership and Executive Management	Updated to reflect organizational realignment announced December 2022.
2.4.4 Key Staff	Updated to reflect organizational realignment announced December 2022.
2.4.5 Safety Committees	Updated to reflect the establishment of Department and Facility Safety Committees.
3.0 Safety Risk Management	Updated to reflect safety risk management core priority.
3.1 Safety Risk Management Process	Updated to reflect new Safety Risk Management Process Flow.
3.1.1 Safety Hazard Identification	
3.1.2 Safety Risk Assessment	
3.1.3 Safety Risk Mitigation	
3.2 Ongoing Management of Safety Risk	
3.2.1 Occupational Safety and Health Risk Management	Updated to clarify office of Occupational Safety and Health role and organizational realignment announced December 2022.
3.2.2 Operational Safety Risk Management	
3.2.3 Safety Certification	
3.2.4 Environmental Risk Management	Previously section 5.2.5, re-organized to group with other Safety Risk Management activities
4.0 Safety Assurance	Updated to reflect Safety Data Analytics activities.
4.1 Safety Performance Monitoring and Measurement	
4.1.1 Monitoring Operations and Maintenance Procedures	
4.1.2 Monitoring of Operational Safety Risk Mitigations	
4.1.3 Safety Investigations	Updated to reflect new procedural documents, shared investigative process, and SRC role in Just Culture analysis
4.1.4 Information Monitoring	Updated to reflect new procedural documents
4.1.5 Emergency Risk Management	New section.
4.2 Management of Change	
4.3 Continuous Improvement	
4.4 Corrective Action Plans	Updated to reflect root cause analysis and corrective action process.
5.0 Safety Promotion	
5.1 Competencies and Training	Updated to reflect Safety's role in departmental safety training programs.



5.1.1 Employee Safety Training	Updated to reflect current training requirements
5.1.2 Safety Rules and Procedures Training	Updated to reflect organizational realignment announced December 2022; updates to RWP training program
5.1.3 Contractor Safety	Updated to reflect new safety inspections process.
5.1.4 Training Recordkeeping	
5.1.5 Compliance with Training Requirements	
5.1.6 SMS-specific Training Requirements	Updated to reflect training requirements for personnel conducting triennial Internal Safety Reviews.
5.2 Safety Communication	
5.2.1 Direct Staff Communication	New section.
5.2.2 Hazard and Safety Risk Information	Renumbered; updated to note Origami as risk database.
5.2.3 Employee Safety Reporting Program Engagement	Renumbered; updated with new SMS dashboard view.
6.0 Documentation	Previously section 4.5, moved to match structure of §673 as section 29 follows assurance.
Appendix A – SMS Strategic Roadmap	New, replaces duplication of P/I 10.8/0 Safety Management Policy.
Appendix B – Definitions	Updated with new terminology.
Appendix C – Acronyms	Updated with new terminology.
Appendix D – Safety-related Training by Group	Updated to reflect new training offerings.
Appendix E – JLMSC ASP Approval Record	Renumbered.
Appendix F – PTASP General Manager Certification	Renumbered.
Appendix G – WMATA Board Resolution Record	Renumbered.
Appendix H – PTASP SSOA Certification	Renumbered.
Appendix I – ASP Revision History	New Appendix, previously a table within section 1.2, Plan Development Approval and Updates.