2025

Detroit Department of Transportation

Public Transportation Agency Safety Plan

City of Detroit, Department of Transportation
100 Mack Avenue
Detroit, MI 48201

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General

Revision History

Version Number	Section/Pages Affected	Reason for Change	Date Issued
0	0	Initial issuance of PTASP	September 14, 2020
2022	• **2.2.4.1** Garage Safety Committees • **2.2.4.2** Preventable Review Committee • **Table 1** Definitions of Terms Used in PTASP	Addition of BIL requirements	October 21, 2022
2024	• System Description • **3** Safety Risk Management • **4** Safety Assurance • **5** Safety Promotion	Revision to System Description. Additions to: 3. Safety Risk Management, 4. Safety Assurance, 5. Safety Promotion	February 20th, 2024
2025	• Agency Safety Plan Development, Approvals, & Certification	Signature of new accountable executive Signature of labor representative	January 27th, 2025
2025.1	• Acronyms • Definitions • Certification of Compliance • System Description • **1.1.1** PTASP Structure • **1.3.2** Paratransit Services • **2.1** Safety Performance Targets • **2.3** Plan Review & Modification • **2.3.2** Coordination with Planning Stakeholder • **2.3.4** Certification of Compliance • **4.8** Safety Risk Mitigation Recommendations	Update includes the Bipartisan Infrastructure Law required changes; and review & approval by the Joint Labor-Management Safety Committee (JLMSC). Specific sections that comply with the current PTASP requirements include the addition of the following areas: • 2025 Joint Labor-Management Safety Committee (JLMSC) Charter. • Updated 2025 Performance Targets as	October 14th, 2025

Version Number	Section/Pages Affected	Reason for Change	Date Issued
	• **5.1.1** Joint Labor-Management Safety Committee • **5.1.4** Vehicle Maintenance Safety Committee • **5.2.1** Observation of Operators • **Appendix A:** Safety Performance Targets • **Appendix B:** Safety Risk Register • **Appendix C:** Joint Labor-Management Safety Committee (JLMSC) Charter • **Appendix D:** Joint Labor-Management Safety Committee (JLMSC) Approval • **Appendix E:** Preventable Rating Committee (PRC) Charter	required by 49 CFR 673. • General updates by subject matter experts to reflect current DDOT procedures.	

Acronyms

Acronym/ Abbreviation	Definition
PTASP	Agency Safety Plan
CSO	Chief Safety Officer
DDOT	Detroit Department of Transportation
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
NTD	National Transit Database
OSONOC	Other Safety Occurrences Not Otherwise Classified
SMS	Safety Management Systems
SPT	Safety Performance Target
SRRP	Safety Risk Reduction Program
TAM	Transit Asset Management Plan
TEO	Transportation Equipment Operator

Definitions

Term	Definition
Accident	An unforeseen event or occurrence, which causes property damage, personal injuries or fatalities, or any combination thereof.
Accident, Motor Vehicle	An unforeseen event or occurrence, involving a DDOT-owned or operated vehicle which causes property damage, personal injuries or fatalities, or any combination thereof.
Accident, Preventable	An unforeseen event or occurrence, which causes property damage, personal injuries or fatalities, or any combination thereof. Regardless of who was injured, what property was damaged, to what extent or where it occurred, in which the individual in question did not take every reasonable precaution to prevent the accident.
Accident, Preventable (Motor Vehicle)	A preventable accident is any occurrence involving a DDOT-owned or operated vehicle which results in property damage, personal injury, and/or fatality regardless of who was injured, what property was damaged, to what extent or where it occurred, in which the operator in question did not take every reasonable precaution to prevent the motor vehicle accident.
Accountable Executive	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 Safety Management System, 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.
Agency Leadership and Executive Management	Members of agency leadership or executive management (other than an Accountable Executive, CSO, or SMS Executive) who have authorities or responsibilities for day-to-day implementation and operation of an agency's SMS.
Agency Safety Plan	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and 49 CFR 673. *See also Public Transportation Agency Safety Plan (PTASP)*

Term	Definition
Assault on a Transit Worker	As defined under 49 USC 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of a transit worker.
Chief Safety Officer	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 49 CFR 673, or a public transportation provider that does not operate a rail fixed guideway public transportation system.
Collision	A vehicle accident in which there is an impact of a transit vehicle with: • Another transit vehicle • A non-transit vehicle • A fixed object • A person(s) (suicide/attempted suicide included) • An animal • A rail vehicle
Consultants/ Contractors	An individual who is compensated by the transit agency for directly operated (DO) services, the labor expense for the individual is reported in object class 501 labor, or for purchased transportation (PT) service, the labor expense for the individual meets the same criteria as object class 501 labor.
Designated Personnel	Employees and contractors identified by a recipient whose job function is directly responsible for safety oversight of the public transportation system of the public transportation agency.

Term	Definition
Documentation	The written description of policies, processes, procedures, objectives, requirements, authorities, responsibilities, or work instructions in support of DDOT's PTASP and SMS.
Event	An accident, incident, or occurrence.
Fatality	A death or suicide confirmed within 30 days of a reported event. Does not include deaths in or on transit property that are a result of illness or other natural causes.
Fire	Uncontrolled combustion made evident by flame that requires suppression by equipment or personnel or removal of the fuel source or removal of oxygen.
Federal Transit Administration	Federal Transit Administration (FTA) is an operating administration within the United States Department of Transportation.
Hazard	Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
Incident	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

Term	Definition
Injury	Any damage or harm to persons because of an event that requires immediate medical attention away from the scene.
Investigation	The process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
Major Mechanical System Failure	A failure of some mechanical element of a revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns
National Transit Database	National Transit Database (NTD) is a reporting system that collects public transportation financial and operating information.
Near miss	An incident where no property was damaged and no personal injury was sustained but, where given a slight shift in time or position, damage and/or injury easily could have occurred.
Occurrence	An event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
Other Safety Occurrences Not Otherwise Classified	Other Safety Occurrences Not Otherwise Classified (OSONOC) and not specifically listed as a Reportable Event, but that meet a reportable threshold. Includes (but not limited to): • Slips • Trips • Falls • Electric shock • Smoke or the odor of smoke/chemicals noticed in a transit vehicle or facility

Term	Definition
Passenger	A person, other than an operator, who is on board, boarding, or alighting from a vehicle on a public transportation system for the purpose of travel.
Performance Measure	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	A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a period required by the FTA.
Public Transportation Agency Safety Plan (PTASP)	The documented comprehensive agency safety plan for DDOT that is required by 49 U.S.C. 5329 and 49 CFR 673. *See also Agency Safety Plan*
Reportable Events	A safety or security event occurring on transit right-of-way or infrastructure, at a transit revenue facility, at a transit maintenance facility, during a transit-related maintenance activity or involving a transit revenue vehicle that results in one or more of the following conditions: • A fatality confirmed within 30 days of the event • An injury requiring immediate medical attention away from the scene for one or more person(s) • Property damage equal to or exceeding $25,000 • Collisions involving transit revenue vehicles that require towing away from the scene for a transit roadway vehicle or other non-transit roadway vehicle • An evacuation for life safety reasons
Risk	The composite of predicted severity and likelihood of the potential effect of a hazard

Term	Definition
Risk Mitigation	A method or methods to eliminate or reduce the effects of hazards.
Safety Assurance	Processes within the DDOT Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation and ensure that DDOT meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
Safety Committee	A committee composed of representatives of frontline employees and management that is responsible for identifying, recommending, and analyzing the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the agencies' safety risk assessment.
Safety Event	A collision, fire, hazardous material spill, act of nature (Act of God), evacuation, or OSONOC occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds
Safety Management Policy	DDOT's documented commitment to safety, which defines DDOT's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
Safety Management System (SMS)	The formal, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

Term	Definition
Safety Performance	An organization's safety effectiveness and efficiency, as defined by safety performance indicators and targets, measured against the organization's safety objectives.
Safety Performance Indicator	A data-driven, quantifiable parameter used for monitoring and assessing safety performance.
Safety Performance Measure	An expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
Safety Performance Monitoring	Activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.
Safety Performance Target (SPT)	A quantifiable level of performance or condition, expressed as a value for a given performance measure, achieved over a specified timeframe related to safety management activities.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to DDOT's public transportation system.

Term	Definition
Safety Risk	The assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome
Safety Risk Assessment	The formal activity whereby DDOT determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety Risk Management	A process within DDOT's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Serious Injury	Any injury that: 1. Requires hospitalization for more than 48 hours, commencing within seven days from the date the injury was received; 2. Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); 3. Causes severe hemorrhages, nerve, muscle, or tendon damage; 4. Involves any internal organ; or 5. Involves second- or third-degree burns, or any burns affecting more than fivepercent of the body surface
System Reliability	The safety performance measure System Reliability means the distance in miles between major mechanical failures. A reportable major mechanical failure is definedin the National Transit Database Glossary as "a failure of some mechanical elementof the revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns." System Reliability is determined by dividing the number of annual vehicle revenue miles by the number of major mechanical failures, by mode.

Term	Definition
Transit Asset Management Plan	The strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.
Vehicle Revenue Miles (VRM)	The miles that vehicles are scheduled to or travel while in revenue service. Vehicle revenue miles include layover/recovery time and exclude deadhead; operator training; vehicle maintenance testing; and school bus and charter services.

Certification of Compliance

Signature of Accountable Executive/Certification of Compliance	"This certifies that the Detroit Department of Transportation has established a Public Transportation Agency Safety Plan meeting the requirement of 49 CFR Part 673."  10/15/2025 **Robert J. Cramer**, Executive Director of Transit, Detroit Department of Transportation — **Date Signed**
Signature of the Chief Safety Officer	Corie Holmes 10/15/2025 **Corie Holmes,** Chief Safety Officer, Detroit Department of Transportation — **Date Signed**
Entity that Drafted this Agency Safety Plan	Detroit Department of Transportation

System Description

The Detroit Department of Transportation (DDOT) is the largest public transit provider in Michigan and serves the City of Detroit, surrounding suburbs, and neighboring cities, including Highland Park and Hamtramck. The modes of service operated by DDOT include fixed-route and contracted paratransit on demand services. DDOT's total service area is 144 square miles on a hub and spoke system. DDOT prides itself on providing reliable, clean, safe, and efficient service to an average of 85,000 riders daily. DDOT's fixed-route fleet is comprised of 292 buses which operate on 37 routes with 24-hour service on 9 routes. The fleet is approximately 95 percent 40-foot buses, with the remainder being 60-foot buses.

DDOT's Main Office, at 100 Mack Avenue, Detroit, MI 48201, houses administrative offices. Two bus operating facilities, Shoemaker, and Gilbert, serve as bus terminal operations and daily bus maintenance. A third bus operating facility, Coolidge, is currently inactive; however, it is in the construction phase. Heavy Maintenance and Materials Management reside at 1301 E. Warren Ave. DDOT also maintains the daily operation of the Rosa Parks and Jason Hargrove Transit Centers,

DDOT's 2025 budget includes 1,023 full-time equivalent employees, of which 607 are operators, 152 are maintenance, and 264 are administrative.

In addition to operating fixed-route bus service as described above, DDOT also contracts its on-demand paratransit services. Effective January 1st, 2023, all administrative functions were transferred in-house including booking, dispatch, and customer care.

This PTASP applies to both fixed-route and demand response modes operated by the Detroit Department of Transportation and its paratransit contractor.

Safety Management Policy Statement

The Detroit Department of Transportation recognizes management of safety as a core agency function and is dedicated to planning, designing, constructing, operating, and maintaining transportation systems that optimize the safety of passengers, employees, consultants, contractors, emergency responders, and the public.

Accountability for safety begins with the Accountable Executive and permeates all levels of employees. The following safety objectives reflect the agency's overarching safety goals and demonstrate commitment to establishing, implementing, and continually improving Safety Management Systems (SMS):

- Integrate safety management into the primary responsibilities of all employees;
- Support safety management through the allocation of resources and promotion of a safety culture that facilitates safe practices and effective employee safety reporting and communication;
- Define roles and responsibilities for all employees that contribute to safety performance and SMS;
- The operation of a safety committee convened by a joint labor-management process;
- Implement risk-based hazard management consistent with risk acceptance levels;
- Operate an employee safety reporting program that ensures no action will be taken against any employee who discloses a safety concern unless disclosure indicates beyondreasonable doubt an illegal act, gross negligence, or a deliberate disregard of regulationsor procedures;
- Comply with or exceed legislative and regulatory requirements and industry standards;
- Ensure systems and services that support operations meet or exceed agency safety standards;
- Provide safety information and training to ensure all employees are competent in safetymanagement for tasks allocated to them;
- Establish and measure safety performance against data-driven safety performancetargets; and
- Continually improve safety performance and implementation of SMS.

By applying SMS as outlined above and detailed in this PTASP, DDOT is committed to making safety the top priority of all agency operations.

10/15/2025

Robert J. Cramer, Accountable Executive
Executive Director of Transit
Detroit Department of Transportation

Date

1 Introduction

1.1 Safety Management System (SMS) Overview

Safety Management Systems (SMS) is a formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk mitigation. SMS includes systematic and proactive procedures, practices, and policies for managing risks and hazards. By bringing employees together from all levels of the agency to manage risk, SMS helps agencies detect and address safety problems earlier, share and analyze data more effectively, and measure safety performance more precisely.

1.2 PTASP Structure

The PTASP Structure is based on the requirements of 49 CFR Part 673. The PTASP is organized by following §673 sections:

General
§673.1 Applicability
§673.3 Policy
§673.5 Definitions

Safety Plan
§673.11 General requirements
§673.13 Certification of compliance
§673.15 Coordination with metropolitan, statewide, and non-metropolitan

Safety Management System
§673.21 General Requirements
§673.23 Safety Management Policy
§673.25 Safety Risk Management
§673.27 Safety Assurance
§673.29 Safety Promotion

Safety Plan Documentation and Recordkeeping
§673.31 Safety plan documentation
§673.33 Safety plan records

The core of the PTASP is the Safety Management System (SMS). The four (4) main components that make up SMS are:

- **Safety Management Policy** (Section 3) is DDOT's documented commitment to safety, which defines DDOT's safety objectives and the accountabilities and

responsibilities of its employees in regard to safety.

- **Safety Risk Management** (Section 4) is the process within DDOT's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
- **Safety Assurance** (Section 5) is the process within the DDOT Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation and ensure that DDOT meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Promotion** (Section 6) is a combination of training and communication of safety information to support SMS as applied to DDOT's public transportation system.

1.3 Plan Applicability & Scope

1.3.1 Applicability

Recipients and sub-recipients of FTA Urbanized Area Formula Grant Program funds under 49 U.S.C. § 5307 are required to comply with the Public Transportation Agency Safety Plan (PTASP) Final Rule[1]. The Regional Transit Authority of Southeast Michigan (RTA) is the designated recipient for the Detroit, MI Urbanized Area and is responsible for sub-allocating FTA Section 5307 formula funds and for Bus and Bus Facilities formula grant funds provided under 49 U.S.C. § 5339(a).

DDOT and its transportation contractors meet their Public Transportation Agency Safety Plan (PTASP) requirements under 49 CFR Part 673 through participation in this ASP.

1.3.2 Paratransit Services

DDOT contracts for paratransit services with the following service providers:

- People's Express
- Big Star Transit
- Moe Transportation
- Checkers
- Delray

[1] FTA deferred the applicability of the PTASP requirements for small operators who receive funds through FTA's Formula Grantsfor the Enhanced Mobility of Seniors and Individuals with Disabilities Program under 49 U.S.C. § 5310 and for Formula Grants for Rural Areas Program under 49 U.S.C. § 5311.

1.3.3 Scope

DDOT's PTASP meets all the requirements under 49 CFR part 673 and encompasses the equipment, facilities, plans, procedures, operation, and maintenance as they relate to a bus system. The PTASP is scaled to the size, scope, and complexity of DDOT.

2 Safety Plan

This PTASP Safety Plan section outlines DDOT's conformance with SMS components pursuant to 49 CFR 673 including establishing safety performance targets, reviewing and updating of this document, emergency management protocols, coordination with the Southeast Michigan Council of Governments (SEMCOG), which is the metropolitan transportation planning organization for the Metro Detroit Area, and establishing activities and processes to support the Four Components of SMS as described in sections 3.0 – 6.0.

2.1 Safety Performance Targets

DDOT's safety performance measures are based on the measures established under the National Public Transportation Safety Plan. There are fifteen (15) total targets defined by the National PTASP, including eight (8) targets required for the Safety Risk Reduction Program (SRRP). The Safety Division will develop and coordinate, to the maximum extent practicable, these performance targets with the Southeast Michigan Council of Governments (SEMCOG).

All measures will be evaluated over a fiscal year period against a three (3) year average of data reported to the National Transit Database (NTD).

See ***Appendix A: Safety Performance Measures and Targets*** for Performance Targets and methodology.

2.2 Plan Goals, Objectives & Purpose

2.2.1 Purpose

This PTASP formalizes the SMS principles and strategies for demonstrating Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion through all operational and maintenance activities. The PTASP defines the process for identifying, evaluating, and resolving hazards associated with operations of a bus system involved in revenue service. This process helps achieve the highest practical level of operational safety for the riding public, employees, and anyone encountering the systems operated by DDOT.

2.2.2 Goals

The overarching goal of this PTASP is to enhance all aspects of safety within DDOT by guiding effective and proactive management of safety risks in the system and prioritizing capital investments using performance-based planning.

2.2.3 Objectives

The objective of this PTASP is to establish processes and procedures to support the implementation of SMS that meets Federal Transit Administration (FTA)-mandated requirements under the PTASP Final Rule (49 CFR Part 673).

2.3 Plan Review & Modification

The DDOT PTASP will be reviewed at least annually and updated as necessary to ensure that it remains current and consistent with FTA guidance and industry's best practice. When a significant change occurs within DDOT, the agency will consider if any updates to the PTASP are needed. The PTASP will also be updated as necessary following any PTASP audit to ensure the SMS remains current and applicable. Additionally, in 2025, DDOT formed the Joint Labor-Management Safety Committee (JLMSC) to ensure that the PTASP was developed in coordination with frontline staff. If revised, the PTASP will be re-issued to all PTASP recipients. DDOT is responsible for updating the PTASP in partnership with any transportation contractors to whom the PTASP applies.

2.3.1 Document Control

The current version of the PTASP is saved in DDOT's internal electronic file sharing system. All deputy directors, assistant directors and managers are provided with copies of the current PTASP. All DDOT employees have access to an electronic version of the PTASP in DDOT's internal electronic file sharing system. DDOT also makes printed copies of the PTASP available to employees, upon request.

The document's disclaimer statement (below) informs users of the control parameters as follows:

> *The information contained in the PTASP may change without notice and may have been altered or changed if you have received it from a source other than DDOT and/or if the document has been printed. Any printed copy is obsolete or uncontrolled unless verified against the controlled copy in DDOT's internal electronic file sharing system.*

2.3.2 Coordination with Planning Stakeholders

In accordance with 49 CFR 673.15, DDOT will make its safety performance measures available to the State and the Southeast Michigan Council of Governments (SEMCOG) to aid in its regional planning process. To the maximum practicability, DDOT will coordinate with SEMCOG in the selection of these targets.

Targets Transmitted to the Metropolitan Planning Organization(s)	
Metropolitan Planning Organization	**Date Targets Transmitted**
SEMCOG	09/26/2025

See Appendix F: MPO Communication: Annual Safety Performance Targets

2.3.3 Update Process

Through the Joint Labor-Management Safety Committee (JLMSC), DDOT will review this PTASP at least annually and will update the ASP as necessary to ensure that it remains current and consistent with FTA guidance and industry best practice.

Additionally, when a significant change occurs within DDOT or the Metropolitan Planning Organization (MPO), DDOT's Chief Safety Officer will make such proposed changes an agenda item at the subsequent Joint Labor-Management Safety Committee to update the PTASP with applicable changes. The PTASP will also be updated as necessary following any PTASP audit to ensure the SMS remains current and applicable. If revised, the PTASP will be re-issued to the MPO and the updated version of the PTASP will be posted on DDOT's internal website. DDOT is responsible for updating the PTASP in partnership with all applicable transportation contractors.

The annual review by the Joint Labor-Management Safety Committee will include the PTASP and supporting documents (Standard Operating Procedures [SOP], Policies, Manuals, etc.) that are used to fully implement all the processes used to manage safety at DDOT. All changes will be noted, discussed and voted upon by JLMSC members. Upon approval by the JLMSC, the Executive Director of Transit will sign and date the title page of the document and provide documentation of approval. As processes are changed to fully implement SMS or new processes are developed, DDOT will track those changes for use in the annual review.

The implementation of SMS is an ongoing and iterative process, and, as such, this PTASP is a working document. Therefore, a clear record of changes and adjustments is kept in

the PTASP for the benefit of safety plan performance management and to comply with Federal statute.

2.3.4 Annual Certification of Compliance

In accordance with 49 CFR Part 673.13, DDOT has provided an initial certification of compliance, and on an annual basis, will certify thereafter, that it has met FTA's PTASP requirements.

2.4 Integration with Public Safety/ Emergency Management

DDOT is supported by full-time service guards for buildings and facilities; these service guards ultimately report to CSO, but their most direct supervisors are the Senior Service Guards and the DDOT Safety Manager. Detroit Police Department – Transit Unit are dedicated to DDOT and respond to public safety incidents that occur on DDOT's bus operations. They are notified of events through dispatch and respond as needed to support DDOT operations. Detroit Police Department – Transit Unit and AVERT Unit officers have access to video from on-board cameras.

DDOT is a department operating within the City of Detroit governmental framework. Therefore, the agency is part of and follows the City's Emergency Operations Plan.

DDOT has internal Emergency Response Plans for 100 Mack Ave, 1301 E. Warren (to include the rear Maintenance and Materials areas), Shoemaker Garage, Gilbert Garage, Rosa Parks Transit Facility and Jason Hargrove Transit Center. Once construction has been completed at the new Coolidge Terminal, an Emergency Response Plan will be drafted for that location. The Plans include information related to tornado response, fire safety, emergency responsibilities of employees, rally points, and other useful information. Plans are posted at locations, so employees are well versed in evacuation procedures.

3 Safety Management Policy

3.1 Safety Management Policy

DDOT recognizes management of safety as a core agency function and is dedicated to planning, designing, constructing, operating, and maintaining transportation systems that optimize the safety of passengers, employees, consultants, contractors, emergency responders, and the public.

Accountability for safety begins with the Accountable Executive and permeates all levels of employees. The following safety objectives reflect the agencies' overarching safety goals and demonstrate commitment to establishing, implementing, and continually improving the SMS:

- Integrate safety management into the primary responsibilities of all employees, to include union and non-union;
- Support safety management through the allocation of resources and promotion of a safety culture that facilitates safe practices and effective employee safety reporting and communication;
- Define roles and responsibilities for all employees that contribute to safety performance and SMS; The operation of a safety committee convened by a joint labor-management process;
- Implement risk-based hazard management consistent with risk acceptance levels;
- Operate an employee safety reporting program that ensures no action will be taken against any employee who discloses a safety concern unless disclosure indicates beyond reasonable doubt an illegal act, gross negligence, or a deliberate disregard of regulations or procedures;
- Comply with or exceed legislative and regulatory requirements and industry standards;
- Ensure systems and services that support operations meet or exceed agency safety standards;
- Provide safety information and training to ensure all employees are competent in safety management for tasks allocated to them;
- Establish and measure safety performance against data-driven safety performance targets; and
- Continually improve safety performance and implementation of SMS.

By applying SMS as outlined above and detailed in this PTASP, DDOT is committed to making safety the top priority of all operations.

3.2 Safety Accountability & Responsibilities

Identified positions have specific responsibilities under SMS. The table below identifies individuals within DDOT who have safety responsibilities:

Roles & Responsibility	Accountable Executive	Chief Safety Officer (CSO)	Compliance Manager	Executive Director of Paratransit	Deputy Director of Operations	Deputy Director of Maintenance	Deputy Director of Administration	Assistant Directors of Operations/Maintenance	Superintendent of Training Superintendent of Quality Assurance	Data and Reporting Manager	Marketing Manager	City of Detroit, Law Department	Joint Labor-Management Safety Committee	Department Division Heads
Safety Management Policy (Includes annual PTASP updates)	A	P	O,R										P	
Safety Risk Management (Hazard ID/Mitigation)	A	P	O,R				S						P	S
Safety Assurance (Audits/Inspections)	A	P	O,R	S	S	S								
Safety Promotion (Communication/Training)	A	P	O,R	S	S	S	S	S	S		S		S	S
Hazard Identification & Safety Risk Assessment	A	P										S	P	
Safety Reporting & Follow-up	A	P	O,R										S	
Safety Performance Targets & Measurement	A	P	O,R							S			P	
Accident Investigation		P		P	P	P		P					R	
Key:	**A** = Approval, **O** = Oversight, **P** = Primary Role, **S** = Secondary/Support Role, **R** = Review/Comment													

Table 1. Organizational Roles & Responsibilities

3.2.1 Accountable Executive

The Accountable Executive is a single, identifiable person who has ultimate responsibility and accountability for implementing and maintaining the SMS and PTASP. The Accountable Executive may delegate specific responsibilities, but the ultimate accountability for the DDOT's safety performance cannot be delegated and always rests with the Accountable Executive. This is the same person responsible for carrying out the Transit Asset Management (TAM) Plan. The Accountable Executive has control or direction over the human and capital resources needed to develop and maintain the PTASP and the TAM Plan. The Accountable Executive is also responsible for ensuring action is taken, as necessary, to address substandard performance in the SMS including; receiving, considering and implementing safety risk mitigation recommendations as it relates to the safety risk reduction program as well as all other safety risk mitigations recommended by the JLMSC. This individual is the governing entity official and primary decision-maker who is ultimately responsible for both safety and the TAM.

3.2.2 Chief Safety Officer

The Chief Safety Officer is an adequately trained individual who has responsibility for safety. The Chief Safety Officer has the authority and responsibility for day-to-day implementation and operation of the SMS and must have a direct line of reporting to their Accountable Executive. DDOT's Chief Safety Officer has a direct line of reporting to DDOT's Accountable Executive.

3.2.3 All DDOT Employees

All DDOT employees, including agency leadership, executive management, and key staff with safety accountabilities and responsibilities (Table 3), are responsible for safety. Each employee is required to work safely, correct unsafe behavior, identify, and report safety hazards, and abstain from performing any task that the person feels could injure themselves or others.

In addition to the Accountable Executive and Chief Safety Officer, DDOT has identified those with authority and responsibility for day-to-day implementation and operation of the agency's SMS (*See Table 1*).

3.3 Employee Safety Reporting

DDOT supports the safety management system through the allocation of resources and promotion of a safety culture that facilitates safe practices and effective employee safety

reporting and communication. DDOT operates an employee safety reporting program that allows employees to report workplace hazards, assaults on transit workers, near-misses, and unsafe acts and conditions. Additionally, the employee safety reporting program ensures no action will be taken against any employee who discloses a safety concern unless disclosure indicates beyond reasonable doubt an illegal act, gross negligence, or a deliberate disregard of regulations or procedures. DDOT utilizes a Smartsheet to include the ability of employees to report safety hazards. All employees will be able scan a QR code to access an electronic form in the Smartsheet system to identify hazards. The Chief Safety Officer manages the process for tracking hazards that are identified through the employee safety reporting system risks and hazards can also be reported by name or anonymously via the Safety Hotline at (313) 833-9829. To monitor information reported through this reporting program, the hotline is checked daily Monday-Friday. Additionally, if immediately dangerous to life and health, any employee can directly call the CSO or any DDOT Safety Staff.

DDOT will ensure that all employees are encouraged to report safety conditions directly to senior management or their direct supervisor for elevation to senior management.

3.4 SMS Documentation & Records

At all times, DDOT will maintain documents related to the implementation of its SMS and resulting from SMS processes and activities. DDOT will maintain documents that are included in whole, or by reference, that describe the programs, policies, and procedures that it uses to carry out its PTASP. These documents will be made available upon request by the FTA or other federal entity. DDOT will maintain these documents for a minimum of three (3) years after they are created. These documents include:

- Safety Bulletins
- Safety Standard Operating Procedures (SOP's)
- Security Standard Operating Procedures (SOP's)
- Safety Administrative Procedures
- Safety Policies
- Joint Labor-Management Safety Committee Charter
- Preventable Review Committee Charter
- DDOT Safety Rule Book
- Safety Incident/Accident/Injury Investigative Reports

4 Safety Risk Management

Safety Risk Management (SRM) includes the activities that a public transportation agency or contractor undertakes to control the probability or severity of the potential consequence of hazards. Major SRM sub-components include Hazard Identification, Risk Assessment and Risk Mitigation. The six basic steps of SRM that DDOT follows are described below.

1. **Define the System or Asset**
    - Define the physical and functional characteristics and understand and evaluate thepeople, procedures, facilities, equipment, and environment.
2. **Identify Hazards**
    - Identify hazards and incidents or undesired events
    - Determine the causes of hazards
3. **Assess Hazards**
    - Determine probability
    - Determine the severity without controls
    - Decide to accept risk or eliminate/control
4. **Resolve or Mitigate the Hazards**
    - Assume risk, or
    - Implement corrective action
        - Eliminate
        - Control
5. **Reassess Hazard**
    - Assess mitigation or control for effectiveness
    - Apply additional mitigation or controls if risk is not within acceptable levels
6. **Follow-up**
    - Monitor for effectiveness
    - Monitor for unexpected hazards

4.1 Define the System or Asset

The first step in a hazard analysis is defining the systems and sub-systems subject to hazards, followed by identifying specific physical and procedural hazards related to the identified systems and subsystems.

The Detroit Department of Transportation (DDOT) is the largest public transit provider in Michigan and serves the City of Detroit, surrounding suburbs, and neighboring cities, including Highland Park and Hamtramck. DDOT prides itself on providing reliable, clean, safe, and efficient service to an average of 85,000 riders daily. DDOT's total service area is 144 square miles on a hub and spoke system. DDOT's fleet is comprised of 292 buses which operate on 37 routes with 24-hour service on 9 routes. The fleet is approximately 95 percent 40-foot buses, with the remainder being 60-foot buses.

DDOT's Main Office, at 100 Mack Avenue, Detroit, MI 48201, houses administrative offices. Two bus operating facilities, Shoemaker, and Gilbert, serve as bus terminal operations and daily bus maintenance. A third bus operating facility, Coolidge, is currently inactive; however, it is in the construction phase. Heavy Maintenance and Materials Management reside at 1301 E. Warren Ave. DDOT also maintains the daily operation of the Rosa Parks and Jason Hargrove Transit Centers,

DDOT's 2025 budget includes 1,023 full-time equivalent employees, of which 607 are operators, 152 are maintenance, and 264 are administrative.

In addition to operating fixed-route bus service as described above, DDOT also contracts its on-demand paratransit services. Effective January 1st, 2023, all administrative functions were transferred in-house including booking, dispatch, and customer care.

This PTASP applies to both fixed-route and demand response modes operated by the Detroit Department of Transportation and its paratransit contractor.

4.2 Safety Hazard Identification

A safety hazard is:

- Any real or potential condition that can cause personal injury or death or damage to orloss of equipment or property,
- A condition that may be a prerequisite to an accident, or
- Is a situation that has the potential to do harm.

Hazards are identified through a variety of sources, including those listed below. In addition, SMS enables every employee to identify hazards through a non-punitive employee safety and hazard reporting. Additionally, Safety Promotion efforts also help identify hazards, as described further in Section 5.

- FTA's Hazard Analysis Guideline for Transit Projects (January 2000)
- Accident/incident data and experience
- Accident/incident data from other bus systems with similar characteristics
- Hazard scenarios

- Applicable industry standards
- Field assessments and surveys
- Project-specific design data and drawings, reviews, testing, and start-up activities
- Concerns identified through Safety Assurance activities.
- DDOT considers data and information provided by an oversight authority, including but not limited to FTA and the State.

The following tools and techniques may be used for hazard identification and analysis:

- Preliminary Hazard Analysis (PHA)
- Operational Hazard Assessment (OHA)
- Accident/Incident Analysis
- Job Hazard Analysis (JHA)

4.2.1 Infectious Disease

DDOT will take the necessary steps to safeguard employees' health and well-being during widespread outbreaks of infectious bacterial or viral diseases, while ensuring DDOT's ability to maintain essential operations and provide necessary services to customers.

According to the federal Centers for Disease Control (CDC), emerging infectious diseases are new infections resulting from changes or evolution of existing organisms, known infections spreading to new geographic areas or populations, previously unrecognized infections appearing in areas undergoing ecologic transformation, old infections that are reemerging because of antimicrobial resistance in known agents, or breakdowns in public health measures. These include influenza, staph infections, and Coronavirus.

DDOT takes several steps to minimize, to the extent practicable, exposure to infectious diseases at the workplace. As appropriate, DDOT recommends measures that employees can take to protect themselves outside the workplace and encourages employees to discuss their specific needs with a physician or other appropriate health or wellness professional.

DDOT expects employees who contract an infectious disease or are exposed to infected family members or other persons to stay home and seek medical attention if needed. DDOT also expects these employees to notify DDOT as soon as possible of their exposure or illness.

DDOT approves the installation or use, wherever possible, of improved equipment or cleaning methods to guard against the spread of infection at the workplace.

DDOT-provided training will address issues such as the availability of vaccines; symptoms, treatment, and appropriate medical care; steps to take if exposure is suspected; proper use of DDOT-provided personal protection equipment; and proper hygiene in the workplace and at home.

DDOT will follow the appropriate CDC, Transportation Safety Administration, and FTA guidance and directives for any new infectious diseases.

DDOT shares office space (same building) as the City of Detroit Health Department and frequently communicates with Health on best paths forward regarding health and infectious disease matters. Further information can be found by contacting the Detroit Health Department at 313-230-0505.

4.3 Safety Risk Assessment

After identifying system-specific hazards, SRM assesses safety risk by first identifying the potential to do harm in the system and then analyzing options to mitigate the hazard to an acceptable level. The process seeks to identify and define as many hazardous conditions as possible and initiate the safety risk mitigation process before those conditions or associated activities cause an accident. Assessments will take into account existing safety risk mitigations.

The methodology for analyzing safety risk has two elements: evaluating hazard severity and evaluating hazard probability. The US Department of Defense's Standard Practice for System Safety, MIL-STD-882E, establishes system safety criteria guidelines for determining hazard severity and probability. This PTASP adapts the MIL-STD-882E Risk Assessment and Hazard Risk Index matrixes to the transit environment for use in DDOT's safety risk assessment process.

4.3.1 Hazard Severity

Hazards are rated in terms of their effect on transit customers, employees, the public, and the operating system. Hazard severity is a subjective measure of the worst credible case consequence that results from design inadequacies, component failure or malfunction, human error, environmental conditions, operating or maintenance practice, and/or procedure deficiencies. The hazard severity definitions are shown in Table 2. The categorization of hazards is consistent with risk-based criteria for severity and reflects the principle that not all hazards pose an equal amount of risk.

Table 2. Hazard Severity Definitions

SEVERITY	CHARACTERISTICS			
	People	Equipment/Services	Financial	Reputational
Catastrophic (1)	Several deaths and/or numerous severe injuries *(per event)*	Total loss of equipment or system interruption, requiring months to repair	Estimated loss from the incident in excess of $500,000	Ongoing media coverage, irreparable reputational damage, government intervention (weeks to months)
Critical (2)	Low number of deaths and/or serious injury* *(per event)*	Significant loss of equipment or system interruption, requiring weeks to repair	Estimated loss from the incident in excess of $100,000-$499,999	Prolonged media campaign, serious reputational damage, sustained government involvement (days to weeks)
Moderate (3)	Minor injury and possible serious injury *(per event)*	Some loss of equipment or system interruption, requiring seven or less days to repair	Estimated loss from the incident in excess of $10,000-$99,999	Adverse media coverage, reputational damage, government involvement
Minor (4)	Possible minor injury *(per event)*	Some loss of equipment, no system interruption, less than 24 hours to repair	Estimated loss from the incident in excess of $1,000-$9,999	Local media coverage and some reputational damage
Insignificant (5)	No injury	Minor damage to equipment no system interruption, no immediate repair necessary	Estimated loss from the incident is likely less than $1,000	No adverse media coverage or reputational damage

*Per 49 CFR 673, serious injury: 1) Requires hospitalization for more than 48 hours, commencing within seven days from the date of the injury was received; 2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); 3) Causes severe hemorrhages, nerve, muscle, or tendon damage; 4) Involves any internal organ; or 5) Involvessecond or third-degree burns, or any burns affecting more than five percent of the body surface.

4.3.2 Hazard Probability

The probability that a hazard will occur during the planned life expectancy of the system element, sub-system or component is described qualitatively, in potential occurrences per unit of time, events, population, items, or activity. A qualitative hazard probability is derived from research, analysis, evaluation of safety data from the operating experience of the agency or historical safety data from similar bus systems, and from expert opinion. Table 3 summarizes the hazard probability categories.

Table 3. Hazard Probability Categories

Probability Level	Specific Individual Item	Fleet or Inventory	Frequency
Frequent A	Likely to occur frequently in the life of an item	Continuously experienced	> 1 event / month
Probable B	Will occur often in the life of an item	Will occur frequently in the system	> 1 event / year
Occasional C	Likely to occur sometime in the life of an item	Will occur several times	>1 event / 10 year
Remote D	Unlikely, but possible to occur in the life of an item	Unlikely, but can be expected to occur	> 1 event / 20 years
Improbable E	So unlikely, it can be assumed occurrence may not be expected	Unlikely to occur, but possible	< 1 event during 30 years

4.3.3 Risk Analysis

Together, hazard severity and probability measure a hazard's magnitude and priority for applying the control measures. Hazards are then examined, qualified, addressed, and resolved based on the severity of a potential outcome and the likelihood that such an outcome will occur. The value derived by considering a hazard's severity and probability is the Hazard Risk Index. The resulting risk index is a measure of the acceptability or undesirability of the hazard and is applied to the Risk Assessment Index.

Assignment of a Hazard Risk Index enables DDOT management to properly understand the amount of risk involved by accepting the hazard relative to what it would cost (schedule, dollars, operations) to reduce the hazard to an acceptable level.

Table 4 identifies the Hazard Risk Index, based upon hazard severity and probability, and outlines the criteria for further action and decision authority based on each index category. The Hazard Risk Index is used to assist the decision-making process in determining whether a safety risk should be eliminated, controlled, or accepted. This helps prioritize hazardous conditions and focus available resources on the most serious hazards requiring resolution while effectively managing available resources.

For example, if the potential for an accident/incident reveals a Category 1 (catastrophic) occurrence with a Level A (frequent) probability, the assessed level of risk is

unacceptable, and the system safety effort is directed toward eliminating the hazard or at the very least to implementing redundant hazard control measures. A Category 1 (catastrophic) or Category 2 (critical) safety risk may be tolerable if it can be demonstrated that its occurrence is highly improbable. This approach provides a basis for logical management decision-making that considers the hazard's severity and probability.

Table 4. Hazard Risk Index

HAZARD RISK INDICES					
Frequency Or Probability	Severity Category				
	1 Catastrophic	2 Critical	3 Moderate	4 Minor	5 Insignificant
(A) Frequent	1A	2A	3A	4A	5A
(B) Probable	1B	2B	3B	4B	5B
(C) Occasional	1C	2C	3C	4C	5C
(D) Remote	1D	2D	3D	4D	5D
(E) Improbable	1E	2E	3E	4E	5E

LEGEND

Unacceptable - Cannot be accepted as is, **must** be mitigated

Undesirable - Acceptable with Executive-level signoff

Acceptable w/ Review - Acceptable Operational-level signoff

Acceptable - Can be accepted as is

4.3.4 Prioritization

Based on the risk assessment score, DDOT prioritizes hazards for mitigation or elimination as follows:

- **Priority #1** Consequence will occur frequently, probably, or occasionally with catastrophic, critical, or moderate severity (1A, 1B, 1C, 2A, 2B or 3A).

- **Priority #2** Consequence will occur frequently, probably, or occasionally but with catastrophic, critical, moderate, minor, or insignificant severity (1D, 2D, 2C, 3B, 3C, 4A, 4B or 5A).
- **Priority #3** Consequence will occur remotely with catastrophic, critical, moderate, minor, or insignificant severity (1E, 2E, 3D, 3E, 4C, 4D, 5B, or 5C).
- **Priority #4** Consequence will occur improbably with minor or insignificant severity (4E, 5D, or 5E).

Table 5. Prioritization Matrix

Safety Risk Priority	Criteria
Priority #1	**Unacceptable – Action Required** Safety risk must be immediately mitigated or eliminated
Priority #2	**Undesirable – Management Decision** Acceptable with Executive-level signoff
Priority #3	**Acceptable with Review** Acceptable with Operational-level signoff
Priority #4	**Acceptable** Can be accepted as-is

The Safety Department will document identified hazards and track their mitigations in a Safety Risk Assessment Register. An example of the Safety Risk Assessment Register is included in ***Appendix B: Safety Risk Register***.

4.4 Safety Risk Mitigation – Resolve or Mitigate Hazards

As safety risks are identified whether through a formal risk assessment or informally such as through employee reporting mechanisms, hazards can be resolved by deciding to either assume the risk associated with the hazard or to eliminate or control the risk. As a source for safety risk mitigation, DDOT also considers guidance provided by an oversight authority, if applicable, and FTA. As it relates to infectious diseases, DDOT considers guidelines to prevent or control exposure provided by the CDC or a State health authority. Mitigation to bring a hazard to an acceptable level of risk is applied in the following order of precedence, listed from most effective at the top of the list to least effective mitigations at the bottom:

- Avoidance
- Elimination
- Substitution
- Engineering Controls

- Warnings
- Administrative Controls such as Operations and Maintenance Procedures
- Personal Protective Equipment and Guards

Once mitigations are agreed upon for identified hazards, DDOT's safety committee, under leadership of the CSO, will track mitigations through the safety verification process to ensure all concerns raised have been addressed and mitigated properly. The safety committee and CSO will use the hazard tracking software for the hazard tracking and safety verification process.

This program will allow for updating if changes occur that impact the findings of the safety analysis. DDOT's safety committee, will document and track hazards from analysis through implementation.

4.5 Re-Assess the Hazard

After applying mitigations or controls to reduce the risk of the identified hazard, DDOT will review the risk presented by the hazard to confirm the reduction of risk is appropriate and meets the risk criteria and DDOT's risk tolerance. If the risk has not been appropriately reduced, DDOT will identify and apply additional mitigations.

4.6 Follow-up

DDOT will review the hazards being tracked through this process to confirm that the mitigations applied continue to be effective over time and to check if additional hazards have been created by the mitigations. Mitigation effectiveness can be impacted due to program or outside changes, requiring vigilance to maintain risk at the reduced level. If the mitigations are determined to be ineffective or less effective than necessary, DDOT will repeat the hazard management process to review the changed circumstances and revise the mitigations.

When mitigations developed do not meet the safety risk reduction program safety performance targets, hazards will be reassessed, and new mitigations will be developed through the Joint Labor-Management Safety Committee. Newly developed mitigations will be presented to the Accountable Executive for support in implementation. Additionally, DDOT will allocate its safety set-aside in the following fiscal year to safety-related projects eligible under 49 U.S.C. 5307 that are reasonably likely to help it meet missed safety performance target(s) for the safety risk reduction program in the future.

4.7 Corrective Action Plans

If a hazard requires action to be taken, it will be formalized as a Corrective Action Plan (CAP). The CAP is a plan to correct a deficiency that has an action, a person assigned to complete the action as well as a due date.

4.8 Safety Risk Mitigation Recommendations

At the conclusion of investigations and/or at the majority consensus of the variety of Safety Committees, the Safety Division will issue safety risk mitigation recommendations.

Recipients of safety risk mitigation recommendations have fourteen (14) calendar days to implement the recommendation. If a recipient decides not to implement a recommendation emanating from the Safety Division, the recipient division head must prepare a written statement explaining their decision.

4.9 Risk Reduction Program – Assaults on Transit Workers

In accordance with U.S. Code Title 49 §5329(d)(1)(I)(ii), DDOT uses a range of measures to prevent assaults on transit workers, including:

- Operator Area Protective Barriers
- Video Surveillance
- Audio Surveillance (onboard revenue vehicles)
- Automatic Vehicle Location
- Emergency Alarms
- Operating Procedures
- Communication Protocols
- Policing Strategies
- Providing Law enforcement with data and materials necessary to pursue assailants.

DDOT has installed operator barriers on its entire fleet, DDOT will continue to monitor the effectiveness of this program and other measures.

DDOT shall implement the following measures to immediately protect transit workers from assault:

- Penalties Signage
- Passenger Code of Conduct Signage
- Adequate Lighting in Work Areas

- Secure Areas Where Workers Work
- Provide frontline staff with security data and trends. The Union shall receive this data electronically.

4.10 Risk Reduction Program – Vehicular and Pedestrian

In accordance with U.S. Code Title 49 §5329(d)(1)(I)(i), DDOT uses a range of measures to prevent vehicular and pedestrian accidents, including:

Defensive Driving Modules developed by TAPTCO delivered during:

- Initial TEO Induction Training
- TEO Annual Enhancement
- TEO Post-Accident Retraining
- Transportation Equipment Operator (TEO) training outlined in Section 6.2.1

Furthermore, DDOT will explore additional collision avoidance technologies for the DDOT city fleet once the next vehicle procurement cycle begins.

5 Safety Assurance

Safety assurance includes safety reviews, evaluations, audits, and inspections, as well as data tracking and analysis and investigations. Safety assurance encompasses the processes within the DDOT's SMS that ensures the implementation and effectiveness of SRM and ensures that DDOT meets or exceeds its safety objectives through the collection, analysis, and assessment of information. DDOT will conduct an annual review of the effectiveness of its safety risk mitigations through its safety assurance and safety verification efforts and report the results of the review to the Accountable Executive.

5.1 Safety Committees

DDOT has established a variety of safety committees where safety issues and concerns are reviewed and discussed by staff from Safety, Operations, Maintenance, and staff from other Organizational Divisions.

These safety committees include:

- Joint Labor-Management Safety Committee (JLMSC)
- Garage Safety Committee
- Preventable Review Committee (PRC)
- Vehicle Maintenance Safety Committee

5.1.1 Joint Labor-Management Safety Committee

DDOT's Joint Labor-Management Safety Committee (JLMSC) consists of an equal number of frontline employees and management representatives. Pursuant to PTASP regulations, frontline staff representatives are selected by ATU Local 26, AFSCME Local 214 and AFSCME Local 312. To the greatest extent practicable, the JLMSC must include frontline transit worker representatives from major service functions, such as operations and maintenance.

Pursuant to PTASP regulations, the JLMSC must conduct the following activities to oversee DDOT's safety performance:

1. Review and approval of DDOT's Public Transportation Agency Safety Plan (PTASP)
2. Set annual safety performance targets for the safety risk reduction program
3. Support operation of DDOT's safety management system (SMS) by:
    a. Identifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit

agency's safety risk assessment, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program (SRRP);

b. Identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program; and

c. Identifying safety deficiencies for purposes of continuous improvement, including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

d. Identifying and issuing recommendations based on a safety risk reduction program, including mitigations relating to vehicular and pedestrian safety events involving transit vehicles or assaults on transit workers.

When the Joint Labor-Management Safety Committee recommends a safety risk mitigation unrelated to the safety risk reduction program, and the Accountable Executive decides not to implement the safety risk mitigation, the Accountable Executive must prepare a written statement explaining their decision, pursuant to recordkeeping requirement within 673.31.

This public transportation agency safety plan was unanimously approved by the joint labor-management safety committee in October 2025.

Please see ***Appendix C: JLMSC Charter*** for a copy of the JLMSC Charter, which details JLMSC membership, procedures, and responsibilities as described in 49 CFR 673.19.

Please see ***Appendix D: Joint Labor-Management Safety Committee Approval***, which details the approval of the 2025 Public Transportation Agency Safety Plan (PTASP) by the JLMSC.

5.1.2 Garage Safety Committees

The primary objective of the local Garage Safety Committee is to provide support to enhance DDOTs Public Transportation Agency Safety Plan (PTASP). In addition to this primary mission, the Garage Safety Committees encourage employees to participate in the safety process for the betterment of all concerned.

The Garage Safety Committees will be comprised of DDOT employees, at a minimum.

- A DDOT Safety employee
- Garage Operations Superintendent
- Union Safety representatives assigned to each respective garage
- The garage Vehicle Maintenance Manager

5.1.3 Preventable Review Committee (PRC)

The primary objective of the Detroit Department of Transportation (DDOT) Preventable Review Committee (PRC) is to determine the preventability of accidents and provide support to enhance DDOTs Public Transportation Agency Safety Plan (PTASP).

The PRC will be comprised of DDOT employees and service providers as follows:

- Chief Safety Officer (Chair)
- Safety Manager (Co-Chair)
- A rotating DDOT Training employee
- A rotating DDOT Operations Management team member
- Rotating union employees
- A rotating DDOT Scheduling team member
- A rotating DDOT Maintenance team member

Further information on this committee can be found in ***Appendix E: DDOT Preventable Review Committee Charter***.

5.1.4 Vehicle Maintenance Safety Committee

The primary objective of the Detroit Department of Transportation (DDOT) Vehicle Maintenance Safety Committee is to address concerns emanating from the maintenance shop floors and fleet condition complaints.

5.2 Safety Performance Monitoring and Measurement

SMS generates data and information that senior management need to evaluate whether implemented safety risk mitigations are appropriate and effective, and how well an agency's safety performance fits with their established safety objectives and safety performance targets. DDOT's contracted paratransit provider will be required to provide safety performance data monthly, at a minimum, to support DDOT's achievement of its performance targets. Safety performance monitoring will occur through routine monitoring of operations and maintenance activities. It also includes risk monitoring to track implementation and success of mitigations and controls put in place to manage risk.

DDOT will audit and evaluate safety in compliance with this PTASP and SMS. The audit process will include the following activities:

- Monitor compliance and sufficiency of procedures for operations and maintenance

- Monitor operations to identify ineffective, inappropriate, or unimplemented safety risk mitigations
- Conduct investigations of safety events, accidents, and incidents to identify causal factors to improve the safety culture. These investigations will be a joint effort between safety and other disciplines, as need, to provide for a robust investigation.
- Monitor information from safety reporting systems, including the employee safety reporting system
- Document audit outcomes
- Collect and track safety data

Additionally, DDOT will communicate to all staff the outcomes and lessons learned to improve the safety performance of the agency.

5.2.1 Observation of Operators

TEO Instructors emanating from the Operations Training Center provide operator observations as outlined below:

Ride Checks

Operations Training Center Supervisors are required to perform at least two (2) on board evaluations on each student TEO in revenue/line training service. A student TEO is required to have two (2) satisfactory ride check observations prior to completing revenue/line training.

On board Operator observations are conducted using a standardized Field Observation Report Form.

5.3 Safety Investigations

DDOT's Safety division will conduct investigation of safety events to identify causal factors in scenarios including but not limited to;

- Fatalities
- Accidents involving pedestrians
- Accidents involving five (5) or more injuries
- Accidents where the Operator indicates it was caused by a mechanical defect

5.4 Management of Change

DDOT will evaluate safety when significant changes occur within the organization. These changes are evaluated during DDOT's executive team meetings, and may include but are not limited to:

- New contractor providing service or substantive amendment to contract provisions
- New buses brought into fleet
- New or changed routes
- Other changes that might have a safety impact.

If the change has a safety impact, DDOT's CSO will be responsible to initiate the process to evaluate the risk associated with the change, and document and treat the risk. If the change does not have a safety impact, no further steps will be taken, but the analysis shall be documented.

5.5 Continuous Improvement

DDOT will evaluate its SMS program annually to identify areas of improvement. Evaluation of DDOT's SMS program is necessary to ensure that it effectively and efficiently allows the agency to meet safety objectives and performance targets. DDOT will use the data and information gathered while conducting safety performance monitoring to address any identified weaknesses in DDOT's organizational structures, processes, and resources in a timely manner.

6 Safety Promotion

This plan enables DDOT to utilize safety promotion to communicate and disseminate safety information to strengthen DDOT's safety culture. Safety promotion includes safety lessons learned, reporting systems, recommendations based on safety metrics, and safety training. The goal is to foster a positive safety culture where employees receive ongoing training and updates of safety progress; feel comfortable reporting safety issues or concerns; and understand why safety is important and how they impact safety.

6.1 Safety Communication & Culture

DDOT will communicate the safety management policy, objectives, and safety performance information throughout the organization. DDOT will communicate information on hazards and safety risks relevant to employees' roles and responsibilities and inform employees of safety actions taken in response to reports submitted through the employee safety reporting program.

DDOT will review lessons learned from incidents, accidents and reported hazards and provide feedback to employees regarding findings. This communication is an important step in letting employees know that they are important to the organization.

- Methods of communication include but are not limited to:
- New Employee Orientation
- Driver's Training
- Internal Marketing Strategies
- Instructor-Led Training
- Safety Meetings
- Safety Bulletins
- Staff Meetings
- Department bulletin boards
- Employee handbooks
- Safety plans and strategies are communicated throughout the organization to all personnel
- Significant events and investigation outcomes associated with the organization are communicated to all personnel, including contracted organizations where appropriate.
- Posting of Joint Labor-Management Safety Committee minutes at terminal bulletin boards.

In addition, DDOT will review current communications strategies and determine any additional methods that may be needed.

6.2 Competencies & Training

DDOT has a comprehensive safety training program incorporating SMS principles into training materials for all employees and contractors directly responsible for safety in the public transportation system. The training program will include annual SMS training and will include refresher training, as necessary. DDOT will include safety training as part of new-hire training and specific job safety training. DDOT will document and track training and competencies of all staff. Safety training either given by DDOT or required by DDOT to be offered by the agency's contract paratransit provider are listed below.

- Courses that DDOT offers to employees, operators (TAPTCO training), and mechanics pursuing a CDL:
    - New Transit Operator training
    - Operator refresher training
    - Accident prevention training
    - Distracted driving training
- Courses that DDOT requires its contracted paratransit provider to offer:
    - Community Transportation Association of America (CTAA) training
    - CTAA refresher training
    - CTAA Accident prevention module
    - CTAA Distracted driving training
    - Passenger Safety and Sensitivity (PASS) training

All DDOT Paratransit employees receive the training outlined above. Contracted paratransit providers send one representative to the above trainings in a "train the trainer" capacity to deliver the contents to their respective employees.

When contracting for services that have a safety component and/or may impact safety or assessed risk, procurement language and specification requirements will be included, as applicable. Contractors to DDOT will demonstrate job-appropriate competencies and training that meet or exceed the requirements of the agency. The DDOT CSO, or designee, will audit its contracted paratransit provider's compliance with the training requirements on an annual basis. Contract documentation between DDOT and its contracted paratransit provider will be modified to address DDOT's PTASP requirements.

6.2.1 Transportation Equipment Operator (TEO) Training

The keystone in any program for safe bus operations is the training of bus operators. Bus operators at DDOT are known as Transportation Equipment Operators or TEO's. Several of the bus operations training practices are described here in some detail. There are TEO Instructors residing at Shoemaker Terminal and Gilbert Terminal. Their responsibility is to train all new and current TEO's, having duties that involve operations on the bus line.

Safety-related issues and procedures are covered throughout training. De-escalation training modules are available within the annual refresher curriculum. The instructors regularly develop training materials and routinely obtain and review information from other bus transit systems.

New TEO's are trained for 10 weeks if hired with a Commercial Driver's License (CDL) or for 12 weeks if hired without a CDL.

6.2.2 Bus Vehicle Maintenance Training

DDOT's Maintenance Training Unit provides training to all vehicle maintenance personnel. The maintenance training provides employees with information on how to repair mechanical problems common to the specific bus vehicle. In addition, this training provides employees with the knowledge and skills to perform preventive maintenance designed to prevent equipment failures. Bus maintenance training records are maintained by DDOT's maintenance department.

Appendix A: Safety Performance Measures and Targets

DDOT's safety performance measures are based on the measures established under the National Public Transportation Safety Plan. There are fifteen (15) total targets defined by the National PTASP, including eight (8) targets required for the Safety Risk Reduction Program (SRRP). Targets required for the SRRP are bolded and denoted in Column 2. All rates are per 100,000 Vehicle Revenue Miles (VRM).

For each measure, the performance target is to maintain or improve upon a three (3) year average. For all measures except System Reliability (Measure 5), "improvement" refers to a reduction. For System Reliability (Measure 5), "improvement" refers to an increase.

Sources & Methodology:

Performance targets are calculated based on data pulled from the NTD Open Data portal and contains all Major Safety Events and all Non-Major Safety Events resulting in an injury. Data on vehicle revenue miles (VRM) is derived from the NTD *Monthly Modal Time Series* dataset. For each metric listed, the total number of events are summed for the fiscal year. For the metrics that are rates, this total is then multiplied by 100,000 and divided by the total VRM for that fiscal year.

NTD Historical Monthly Modal Time Series Vehicle Revenue Miles:

Year	MB	DR
2022	8,687,662	2,390,326
2023	9,188,848	2,821,384
2024	9,390,156	3,329,503

2025 Goals:

As of May 2025, there has been an approximate 7% increase in revenue miles. 2022 and 2023 data cannot be verified by the current Safety Division administration; therefore, more weight was placed on 2024 data when determining 2025 SPT goals. For 2025, total number figures were multiplied by a factor of 7% to account for the increase in revenue miles – this results in SRRP rates holding firm to establish the agency's trend baseline. Once this baseline is established, SPT's for 2026 will reflect targeted reductions.

2022 Data

National PTASP Numbering	Safety Risk Reduction Program Numbering	Measure	MB	DR
Measure 1a	**1**	**Major Safety Events**	47	1
Measure 1b	**2**	**Major Safety Events – Rate per 100,000 Revenue Miles**	0.54	0.04
	3	**Collisions**	37	1
Measure 1.1	**4**	**Collisions – Rate per 100,000 Revenue Miles**	0.43	0.04
Measure 1.1.1		Pedestrian Collisions – Rate per 100,000 Revenue Miles	1	0
Measure 1.1.2		Vehicular Collisions – Rate per 100,000 Revenue Miles	0.39	0.04
Measure 2a		Fatalities	1	0
Measure 2b		Fatalities – Rate per 100,000 Revenue Miles	0.01	0
Measure 2.1		Transit Worker Fatalities – Rate per 100,000 Revenue Miles	0	0
Measure 3a	**5**	**Injuries**	126	16
Measure 3b	**6**	**Injuries – Rate per 100,000 Revenue Miles**	1.45	0.68
Measure 3.1		Transit Worker Injuries – Rate per 100,000 Revenue Miles	0.24	0.04
Measure 4a	**7**	**Assaults on Transit Workers**	3	0
Measure 4b	**8**	**Assaults on Transit Workers – Rate per 100,000 Revenue Miles**	0.03	0
Measure 5		System Reliability – Mean Distance Between Major Mechanical Failures	11,179	159,355

2023 Data

National PTASP Numbering	Safety Risk Reduction Program Numbering	Measure	MB	DR
Measure 1a	**1**	**Major Safety Events**	41	3
Measure 1b	**2**	**Major Safety Events – Rate per 100,000 Revenue Miles**	0.45	0.11
	3	**Collisions**	32	3
Measure 1.1	**4**	**Collisions – Rate per 100,000 Revenue Miles**	0.35	0.11
Measure 1.1.1		Pedestrian Collisions – Rate per 100,000 Revenue Miles	0.01	0.04
Measure 1.1.2		Vehicular Collisions – Rate per 100,000 Revenue Miles	0.29	0.07
Measure 2a		Fatalities	1	0
Measure 2b		Fatalities – Rate per 100,000 Revenue Miles	0.01	0
Measure 2.1		Transit Worker Fatalities – Rate per 100,000 Revenue Miles	0	0
Measure 3a	**5**	**Injuries**	98	11
Measure 3b	**6**	**Injuries – Rate per 100,000 Revenue Miles**	1.07	0.39
Measure 3.1		Transit Worker Injuries – Rate per 100,000 Revenue Miles	0.34	0.14
Measure 4a	**7**	**Assaults on Transit Workers**	22	0
Measure 4b	**8**	**Assaults on Transit Workers – Rate per 100,000 Revenue Miles**	0.24	0
Measure 5		System Reliability – Mean Distance Between Major Mechanical Failures	11,262	197,862

2024 Data

National PTASP Numbering	Safety Risk Reduction Program Numbering	Measure	MB	DR
Measure 1a	**1**	**Major Safety Events**	62	2
Measure 1b	**2**	**Major Safety Events – Rate per 100,000 Revenue Miles**	0.66	0.06
	3	**Collisions**	55	2
Measure 1.1	**4**	**Collisions – Rate per 100,000 Revenue Miles**	0.59	0.06
Measure 1.1.1		Pedestrian Collisions – Rate per 100,000 Revenue Miles	0.02	0
Measure 1.1.2		Vehicular Collisions – Rate per 100,000 Revenue Miles	0.53	0.06
Measure 2a		Fatalities	1	0
Measure 2b		Fatalities – Rate per 100,000 Revenue Miles	0.01	0
Measure 2.1		Transit Worker Fatalities – Rate per 100,000 Revenue Miles	0	0
Measure 3a	**5**	**Injuries**	124	8
Measure 3b	**6**	**Injuries – Rate per 100,000 Revenue Miles**	1.32	0.24
Measure 3.1		Transit Worker Injuries – Rate per 100,000 Revenue Miles	0.13	0.03
Measure 4a	**7**	**Assaults on Transit Workers**	31	0
Measure 4b	**8**	**Assaults on Transit Workers – Rate per 100,000 Revenue Miles**	0.33	0
Measure 5		System Reliability – Mean Distance Between Major Mechanical Failures	9,366	180,931

2025 Goal

National PTASP Numbering	Safety Risk Reduction Program Numbering	Measure	MB	DR
Measure 1a	**1**	**Major Safety Events**	≤66	≤2
Measure 1b	**2**	**Major Safety Events – Rate per 100,000 Revenue Miles**	≤0.66	≤0.06
	3	**Collisions**	≤59	≤2
Measure 1.1	**4**	**Collisions – Rate per 100,000 Revenue Miles**	≤0.59	≤0.06
Measure 1.1.1		Pedestrian Collisions – Rate per 100,000 Revenue Miles	≤0.02	≤0
Measure 1.1.2		Vehicular Collisions – Rate per 100,000 Revenue Miles	≤0.53	≤0.06
Measure 2a		Fatalities	≤0	≤0
Measure 2b		Fatalities – Rate per 100,000 Revenue Miles	≤0	≤0
Measure 2.1		Transit Worker Fatalities – Rate per 100,000 Revenue Miles	≤0	≤0
Measure 3a	**5**	**Injuries**	≤133	≤8
Measure 3b	**6**	**Injuries – Rate per 100,000 Revenue Miles**	≤1.32	≤0.24
Measure 3.1		Transit Worker Injuries – Rate per 100,000 Revenue Miles	≤0.13	≤0.03
Measure 4a	**7**	**Assaults on Transit Workers**	≤33	≤0
Measure 4b	**8**	**Assaults on Transit Workers – Rate per 100,000 Revenue Miles**	≤0.33	≤0
Measure 5		System Reliability – Mean Distance Between Major Mechanical Failures	≥9,366	≥180,931

Appendix B: Safety Risk Register (Exemplar)

Identification						
Hazard	**Hazard Type**	**Identification Date**	**Identification Source**	**Analysis Date**	**Worst Possible, Worst Credible, or Most Common Potential Consequence**	**Existing Mitigation(s)**
PCR 3x the desired baseline. During the hiring process, there is no policy that differentiates the eligibility criteria between an employee hired to drive a car and an employee hired to operate a commercial vehicle.	Physical -- Bodily Injury - Property Damage	6/10/2024	PRC Committee	6/10/2024	Most Common Potential Consequence - Preventable Accidents	N/A

Initial Safety Risk Rating				
Hazard	**Severity of Consequences**	**Likelihood of Consequences**	**Safety Risk Index**	**Safety Risk Priority**
PCR 3x the desired baseline. During the hiring process, there is no policy that differentiates the eligibility criteria between an employee hired to drive a car and an employee hired to operate a commercial vehicle.	3 (Moderate)	A (Frequent)	**3A** (Unacceptable)	**Priority # 1** – Unacceptable – Cannot be accepted as is, must be mitigated

Mitigation Plan/Action	
Hazard	**Mitigation Plan/Action**
PCR 3x the desired baseline. During the hiring process, there is no policy that differentiates the eligibility criteria between an employee	1. Establish a more stringent eligibility standard for prospective employees tasked with operating a city owned commercial vehicle. 2. Establish a policy that dictates the use of driving records in evaluating candidates for employment. 3. Update Job Description Requisition to include the newly adopted evaluation criteria. 4. Incorporate newly established policy into the hiring process.

hired to drive a car and an employee hired to operate a commercial vehicle.	

Revised Safety Risk Index		
Hazard	**Revised Safety Risk Index/Priority**	**Revised Safety Risk Index Date**
PCR 3x the desired baseline. During the hiring process, there is no policy that differentiates the eligibility criteria between an employee hired to drive a car and an employee hired to operate a commercial vehicle.	**Revised Safety Risk Index:** 3C (Moderate) **Revised Safety Risk Priority:** 2	Pending

Mitigation Owner and Implementation Date			
Hazard	**Department Responsible for Mitigation**	**Estimated Implementation Date**	**Contact Person**
PCR 3x the desired baseline. During the hiring process, there is no policy that differentiates the eligibility criteria between an employee hired to drive a car and an employee hired to operate a commercial vehicle.	Executive Director, Director of Operations, Human Resources, Office of Compliance, Chief Safety Officer	Pending	Executive Director

HAZARD RISK INDICES					
Frequency Or Probability	Severity Category				
	1 Catastrophic	2 Critical	3 Moderate	4 Minor	5 Insignificant
(A) Frequent	1A	2A	3A	4A	5A
(B) Probable	1B	2B	3B	4B	5B
(C) Occasional	1C	2C	3C	4C	5C
(D) Remote	1D	2D	3D	4D	5D
(E) Improbable	1E	2E	3E	4E	5E

Safety Risk Priority	Criteria
Priority #1	**Unacceptable – Action Required** Safety risk must be immediately mitigated or eliminated
Priority #2	**Undesirable – Management Decision** Acceptable with Executive-level signoff
Priority #3	**Acceptable with Review** Acceptable with Operational-level signoff
Priority #4	**Acceptable** Can be accepted as-is

Appendix C: JLMSC Charter

Document Begins on Next Page

DDOT Joint Labor-Management Safety Committee Charter – Bus & Paratransit

Version 2025

POC for Changes: DDOT Chief Safety Officer

DDOT Joint Labor-Management Safety Committee Charter – Bus & Paratransit

Approved By:

10/15/2025

Robert J. Cramer **Date**

Executive Director of Transit

Corie Holmes

10/15/2025

Corie Holmes **Date**

Chief Safety Officer

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Document Revision Record

Revision #	Summary of Changes	Affected Pages	Concurrence Date	Effective Date
Original	Original			

Definitions

Accident: An unforeseen event or occurrence, which causes property damage, personal injuries or fatalities, or any combination thereof.

Accident, Motor Vehicle: An unforeseen event or occurrence, involving a DDOT-owned or operated vehicle which causes property damage, personal injuries or fatalities, or any combination thereof.

Accident, Preventable: An unforeseen event or occurrence, which causes property damage, personal injuries or fatalities, or any combination thereof. Regardless of who was injured, what property was damaged, to what extent or where it occurred, in which the individual in question did not take every reasonable precaution to prevent the accident.

Accident, Preventable (Motor Vehicle): A preventable accident is any occurrence involving a DDOT-owned or operated vehicle which results in property damage, personal injury, and/or fatality regardless of who was injured, what property was damaged, to what extent or where it occurred, in which the operator in question did not take every reasonable precaution to prevent the motor vehicle accident.

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

Damage: Includes damage to DDOT equipment whether it be contracted/owned/leased and any other property involved in the accident.

Fatality: A death or suicide confirmed within thirty (30) days of a reported event. Does not include deaths in or on transit property that are a result of illness or other natural causes.

Federal Transit Administration (FTA): The operating administration within the United States Department of Transportation.

Fire: Uncontrolled combustion made evident by flame that requires suppression by equipment or personnel. When a fire is caused by a mechanical defect, the accident will be classified as a mechanical failure. The rationale for this being that the accident should be classified to reflect the initial condition that resulted in the accident.

Class A Fires: Class A fires involve ordinary combustible materials like paper, wood and fabrics, rubber. Most of the times, this type of fire is effectively quenched by water or insulating by another suitable chemical agent.

Class B Fires: Class B fires mostly involve flammable liquids (like gasoline, oils, greases, tars, paints etc.) and flammable gases. Dry chemicals and carbon dioxide are typically used to extinguish these fires.

Class C Fires: Class C fires involve live electrical equipment like motors, generators, and other appliances. For safety reasons, non-conducting extinguishing agents such as dry chemicals or carbon dioxide are usually used to put out these fires.

Arson: The act of intentionally or recklessly setting fire to another's property in order to damage or destroy (i.e., Person lights a fire on a vehicle or at a station) – **Security Issue**.

Incident: An unforeseen event or occurrence, which does not necessarily result in death, injury, or property damage, or any combination thereof.

Injury: Includes physical harm or damage to a passenger(s), operator and others directly involved in an accident.

Injury – Apparent: Any accident that causes any person to show evidence of an abrasion, bruise, swelling, burns, limping or obviously painful movement and/or bleeding wound, distorted member, etc. or causes any person to receive medical treatment at the scene of the accident or to be transported to a hospital of treatment.

Injury – Claimed: No apparent evidence of injury to any person involved in the accident by the observer but claimed by a person.

Injuries – Multiple: All accidents in which two (2) or more persons are injured.

Major Mechanical System Failure: A failure of some mechanical element of a revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns.

Mechanical Failure Accident: An accident after investigation determined to be primarily caused by the failure of a component or assembly that causes the vehicle to malfunction regardless of whether the failure occurred because of human error, maintenance, or design deficiencies.

Near Miss: All incidents, which did not involve personal injury or damage to equipment or property but could have resulted in death or serious injury.

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

Property: Vehicles, equipment or other physical objects that are contracted/owned/leased by DDOT or others that were involved in an accident.

1 Purpose

This charter outlines the structure, composition, and procedures of DDOT's Joint Labor-Management Safety Committee (JLMSC) as required by the Public Transportation Agency Safety Plan (PTASP) regulation (49 CFR Part 673, Subpart C). Under this regulation, transit agencies are required to establish safety committees with equal numbers of frontline transit worker and management representatives to address safety issues.

2 Structure

2.1 Membership

DDOT's Joint Labor-Management Safety Committee (JLMSC) consists of an equal number of frontline employees and management representatives. Pursuant to PTASP regulations, frontline staff representatives are selected by Amalgamated Transit Union (ATU) Local 26, AFSCME Local 214, and AFSCME Local 312. To the greatest extent practicable, the JLMSC must include frontline transit representatives from major transit service functions, such as operations and maintenance, across the system.

DDOT Management Membership **Management Chair*	**Frontline Transit Worker Membership** **Frontline Chair*
Primary Members: 1. *Corie Holmes (Safety) 2. Jennie Whitfield (Administration) 3. Darren Beach (Maintenance) 4. Alicia Miller (Compliance) 5. Andre Mallet (Operations) 6. Geena Schofield (Scheduling) 7. DeMarcus Garrett (Paratransit)	**Primary Members:** 1. *Shetrone Collier (TEO-ATU26) 2. Ed Smith (TEO-ATU26) 3. Bronte Kimbrough (TEO-ATU26) 4. Damond Jackson (TEO-ATU26) 5. Owezo Hicks (TEO-ATU26) 6. Tony Herring (TED-AFSCME214) 7. Larry Carter (GAM-AFSCME312)

2.2 Attendance

All primary members are expected to attend the monthly JLMSC meetings. If the primary member is not available, then a designee member is expected to attend in their place. Designee's shall only attend committee meetings when the primary member is unable to attend.

To ensure continuity of information shared during the JLMSC meetings, agendas and minutes will be made available to all primary members. Primary members are expected brief their designees on committee activities when they are asked to attend the JLMSC meeting in their place.

2.3 Support Staff

Administrative support for the JLMSC will be provided by the Safety Division. This includes

generating and distributing meeting agendas, minutes, and other committee materials, and maintaining records of required committee training.

3 JLMSC Responsibilities

Pursuant to PTASP regulations, the JLMSC must conduct the following activities to oversee the transit agencies safety performance:

1. Review and approve DDOT's Public Transportation Agency Safety Plan (PTASP)
2. Set annual safety performance targets for the safety risk reduction program
3. Support operation of the transit agency's safety management system (SMS) by:
    a. Identifying and recommending safety risk mitigations necessary to reduce the likelihood and severity of potential consequences identified through the transit agency's safety risk assessment, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program;
    b. Identifying safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended, including safety risk mitigations associated with any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program; and
    c. Identifying safety deficiencies for purposes of continuous improvement including any instance where the transit agency did not meet an annual safety performance target in the safety risk reduction program.

3.1 PTASP Review & Approval Process

DDOT will review its PTASP on an annual basis to determine if updates are required. The JLMSC will be an integral part of the required Frontline Staff review and development.

3.2 Setting Annual Performance Targets

Annual performance targets will be set based on a three-year rolling average of the data submitted to the National Transit Database (NTD) and approved as part of the annual PTASP update.

3.3 Support Safety Management System (SMS) Process

As part of the annual PTASP review. Subject Matter Experts (SMEs) will be invited to participate in committee meetings to discuss safety risk mitigations for their respective work units to support the SMS process.

4 Procedures

4.1 Meeting Frequency, Agendas, and Minutes

- JLMSC meetings will be held at least monthly
- Support Staff (as described above) is responsible for generating and distributing meeting agendas, minutes, and other committee materials.
    - JLMSC chairs can propose agenda items on behalf of their respective group.
- Materials will be disseminated at least one (1) week prior to the scheduled meetings.
- Meeting minutes will be utilized to communicate with the Accountable Executive.

4.2 Training

All JLMSC members will be required to complete the following online training course:

Transportation Safety Institute: SMS Awareness

- **Description**: This one (1) hour online course will introduce the participant to Safety Management Systems (SMS), describe the four (4) components of FTA's SMS Framework, and identify the importance of Employee Safety Reporting Systems to the success of SMS.

This training must be completed within sixty (60) days of adopting this charter or within sixty (60) days of becoming a JLMSC member, whichever is longer. Upon completion of the required training course, JLMSC members shall send a copy of the certificate of completion to the committee chair, who will maintain training records.

4.3 Compensation Policy

All frontline staff of the JLMSC are eligible for release time pay to participate in committee meetings and required training. Management will take the necessary measures to ensure that all Frontline Staff Committee Members are able to participate in JLMSC meetings upon receiving a written request.

4.4 Subject Matter Experts (SMEs)

On an as needed basis, the JLMSC will invite subject matter experts (SMEs) to participate in committee meetings to support deliberations set forth by the committee. This includes sharing information on agency programs, resources, tools, and data.

4.5 Discussion Time Limits

To establish and maintain a productive course of action on individual safety issues, the JLMSC has established discussion time limits that must be adhered to. Discussion time limits will be generally kept to a five (5) minute time limit per safety issue.

4.6 Decision Making

Each primary member of the JLMSC (or their designee, if the primary member is unavailable) will vote on whether to approve the PTASP at the conclusion of the annual review and update. The PTASP will be considered approved if the majority of members vote in support of PTASP approval.

4.6.1 Dispute Resolution

In the event a motion to vote is presented and the result is a tie. To resolve the impasse the committee shall follow the following steps:

- Committee chair will present all facts pertaining to the matter again.
- Committee shall vote again; the result of the secondary vote will be binding.
- If the re-vote results in a tie again, the committee shall table the matter to the next JLMSC meeting, classified as OLD BUSINESS and ensure that a neutral third-party is present to cast the tie-breaking vote.
- Once the tie-breaking vote is cast, the result will be binding and memorialized within the meeting minutes.

Neutral Third-Party Selection Criteria:
The neutral third-party shall not be an ordinary committee member as referenced in *2.1 Members*.

The neutral third-party shall be presented all facts pertaining to the matter being voted on, on the day the tie-breaking vote is to be cast.

4.7 Sub-Committees

4.7.1 Sub-Committee Actions

When a safety issue cannot be resolved in a reasonable amount of time (to be determined by the Chair), a sub-committee (of at least 2 people) will be selected, and the safety issue will be turned over to the sub-committee for investigation and development of recommendations. Subcommittees will be classified as OLD BUSINESS and integrated into the next JLMSC meeting as appropriate.

Sub-committees will be given a suspense date by the JLMSC Chair to ensure a timely course of action. The JLMSC will suspend sub-committees when an issue has been resolved or, if the current sub-committee cannot come to a timely resolution. Additional time may be awarded as required.

4.7.2 Sub-Committee Responsibilities

Sub-committees will be established based on the experience, expertise, responsibilities, and capabilities of the members selected. Sub-committees are NOT intended to be a decision-making body. Sub-committees are charged with determining possible courses of action for the resolution of safety issues not resolved during JLMSC. Sub-committee findings will be presented at the JLMSC.

Sub-committees will:

- Provide recommendations for resolutions by the next JLMSC or by a previously determined date.
- Not be afforded decision-making power for any safety issue
- Present recommended courses of action to the JLMSC. Safety issues will be determined based on the following decision tier:
    - Engineering controls will be considered priority
    - Administrative controls will be considered second priority
    - Personal Protective Equipment (PPE) will be considered third priority

4.8 Prioritization of Safety Issues/Hazard Identification

Hazard identification shall be defined as conditions that have potential for causing an accident or injury. The first step in this process is to define the physical and functional characteristics of the system to be analyzed. These characteristics are presented in terms of the major elements which make up the system:

- Equipment,
- Procedures,
- People, and
- Environment.

Knowledge of how the individual system elements interface with each other is essential to the hazard identification effort.

The following table illustrates the approach to be taken for each hazard that is brought to the attention of the JLMSC. Hazards will be documented in the Hazard/Corrective Action Log. Safety issues will be prioritized according to the Hazard Risk Index and Prioritization Matrix outlined in sections *4.8.3* and *4.8.4*.

4.8.1 Severity Categories

To determine the appropriate severity category at a given point in time, identify the potential for death or injury, environmental impact, or monetary loss using the characteristics below - A given hazard may have the potential to affect one or all areas:

SEVERITY	CHARACTERISTICS			
	People	**Equipment/Services**	**Financial**	**Reputational**
Catastrophic (1)	Several deaths and/or numerous severe injuries *(per event)*	Total loss of equipment or system interruption, requiring months to repair	Estimated loss from the incident in excess of $500,000	Ongoing media coverage, irreparable reputational damage, government intervention (weeks to months)
Critical (2)	Low number of deaths and/or serious injury* *(per event)*	Significant loss of equipment or system interruption, requiring weeks to repair	Estimated loss from the incident in excess of $100,000-$499,999	Prolonged media campaign, serious reputational damage, sustained government involvement (days to weeks)
Moderate (3)	Minor injury and possible serious injury *(per event)*	Some loss of equipmentor system interruption, requiring seven or less days to repair	Estimated loss from the incident in excess of $10,000-$99,999	Adverse media coverage, reputational damage, government involvement
Minor (4)	Possible minor injury *(per event)*	Some loss of equipment, no system interruption, less than 24 hours to repair	Estimated loss from the incident in excess of $1,000-$9,999	Local media coverage and some reputational damage
Insignificant (5)	No injury	Minor damage to equipment no system interruption, no immediate repair necessary	Estimated loss from the incident is likely less than $1,000	No adverse media coverage or reputational damage

*Per 49 CFR 673, serious injury: 1) Requires hospitalization for more than 48 hours, commencing within seven days from the date of the injury was received; 2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); 3) Causes severe hemorrhages, nerve, muscle, or tendon damage; 4) Involves any internal organ; or 5) Involvessecond or third-degree burns, or any burns affecting more than five percent of the body surface.

4.8.2 Probability Levels

To determine the appropriate probability level for a given hazard at a given point in time, assess the likelihood of an occurrence of a mishap using the matrix below:

Probability Level	Specific Individual Item	Fleet or Inventory	Frequency
Frequent **A**	Likely to occur frequently in the life of an item	Continuously experienced	> 1 event / month
Probable **B**	Will occur often in the life of an item	Will occur frequently in the system	> 1 event / year
Occasional **C**	Likely to occur sometime in the life ofan item	Will occur several times	>1 event / 10 year
Remote **D**	Unlikely, but possible to occur in the life of an item	Unlikely, but can be expected to occur	> 1 event / 20 years
Improbable **E**	So unlikely, it can be assumed occurrence may not be expected	Unlikely to occur, but possible	< 1 event during 30 years

4.8.3 Hazard Risk Index

Assessed risks are expressed as a Risk Assessment Code which is a combination of one severity category and one probability level. See table below:

HAZARD RISK INDICES					
Frequency Or Probability	Severity Category				
	1 Catastrophic	2 Critical	3 Moderate	4 Minor	5 Insignificant
(A) Frequent	1A	2A	3A	4A	5A
(B) Probable	1B	2B	3B	4B	5B
(C) Occasional	1C	2C	3C	4C	5C
(D) Remote	1D	2D	3D	4D	5D
(E) Improbable	1E	2E	3E	4E	5E

LEGEND

Unacceptable - Cannot be accepted as is, **must** be mitigated

Undesirable - Acceptable with Executive-level signoff

Acceptable w/ Review - Acceptable Operational-level signoff

Acceptable - Can be accepted as is

4.8.4 Prioritization Matrix

Based on the risk assessment score, the JLMSC shall prioritize hazards for mitigation or elimination as follows:

- **Priority #1** Consequence will occur frequently, probably, or occasionally with catastrophic, critical, or moderate severity (1A, 1B, 1C, 2A, 2B or 3A).
- **Priority #2** Consequence will occur frequently, probably, or occasionally but with catastrophic, critical, moderate, minor, or insignificant severity (1D, 2D, 2C, 3B, 3C, 4A, 4B or 5A).
- **Priority #3** Consequence will occur remotely with catastrophic, critical, moderate, minor, or insignificant severity (1E, 2E, 3D, 3E, 4C, 4D, 5B, or 5C).
- **Priority #4** Consequence will occur improbably with minor or insignificant severity (4E, 5D, or 5E).

Safety Risk Priority	Criteria
Priority #1	**Unacceptable – Action Required** Safety risk must be immediately mitigated or eliminated
Priority #2	**Undesirable – Management Decision** Acceptable with Executive-level signoff
Priority #3	**Acceptable with Review** Acceptable with Operational-level signoff
Priority #4	**Acceptable** Can be accepted as-is

4.8.5 Hazard/Corrective Action Log

Hazard log provides system safety progress visibility and traceability for use in progress reports.

- The Hazard/Corrective Action Log will be used to track each hazard and corrective action to closure.
- Each Hazard and Corrective Action will have a point person, dated ID, description of hazard/corrective action, initial hazard assessment, and status.
- JLMSC Chair will deliver hazards and corrective action to appropriate holders before the next JLMSC.

Appendix D: Joint Labor-Management Safety Committee Approval

Detroit Department of Transportation
Safety & Security Division
Administrative Offices
100 Mack Avenue
Detroit, MI 48201

Date: October 14, 2025

To: Safety Promotion Team
Office of Transit Division Safety and Oversight
1200 New Jerey Ave, SE
Washington D.C., 20590

CC: Robert J. Cramer, Executive Director of Transit
Corie Holmes, Chief Safety Officer
Schetrone Collier, President, ATU Local 26
Tony Herring, President, AFSCME Local 214
Muneer Islam, President, AFSCME Local 312

From: Joint Labor-Management Safety Committee (JLMSC)

RE: 2025 Public Transportation Agency Safety Plan (PTASP)

Per instructions of the Bipartisan Infrastructure Law, the Joint Labor-Management Safety Committee revised and updated the agency's PTASP. The committee is composed of 50% of frontline staff from the ATU Local 26, AFSCME Local 214, & AFSCME Local 312 and 50% of Management Staff from the Detroit Department of Transportation (DDOT).

In October 2025, the Joint Labor-Management Safety Committee was created to begin incorporating applicable PTASP requirements outlined in 49 U.S.C. 5329(d). The attached PTASP draft has been approved by all the JLMSC members. The draft will now go through the final signature process with the DDOT Accountable Executive.

Respectfully submitted,

Corie Holmes

Corie Holmes, TSSP, PTSCTP, WSO-CSM
Chief Safety Officer
On behalf of JLMSC Management Members

Bronte Kimbrough
Transportation Equipment Operator
On behalf of JLMSC Frontline Members

Appendix E: DDOT Preventable Review Committee Charter

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DDOT Preventable Review Committee and Accident Review Board Charters

Version 2025

POC for Changes: DDOT Chief Safety Officer

DDOT Preventable Review Committee and Accident Review Board Charters

Approved By:

10/15/2025

Robert J. Cramer **Date**
Executive Director of Transit

Corie Holmes 10/15/2025

Corie Holmes, TSSP-Bus, PTSCTP-Bus, WSO-CSM **Date**
Chief Safety Officer

10/15/2025

Andre Mallet **Date**
Assistant Director of Operations

10/15/2025

Darren Beach **Date**
Deputy Director of Maintenance

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Document Revision Record

Revision #	Summary of Changes Affected Pages	Concurrence Date	Effective Date
Original	Original	October 11, 2021	October 11, 2021
2025	• **4.0** Review of PRC and ARB Charters • **5.1** PRC Composition • **5.2** Attendance • **5.3** Support Staff • **5.5** Confidentiality • **5.6** Use of Best Practices to Guide Decisions • **5.7** Process • **5.8** Preventable Collision Rate (PCR) • **6.1** ARB Composition • **6.2** Scheduling ARB Hearings • **6.3** Process		

Definitions

Term	Definition
Accident	An unforeseen event or occurrence, which causes property damage, personal injuries or fatalities, or any combination thereof.
Accident, Motor Vehicle	An unforeseen event or occurrence, involving a DDOT-owned or operated vehicle which causes property damage, personal injuries or fatalities, or any combination thereof.
Accident, Preventable	An unforeseen event or occurrence, which causes property damage, personal injuries or fatalities, or any combination thereof. Regardless of who was injured, what property was damaged, to what extent or where it occurred, in which the individual in question did not take every reasonable precaution to prevent the accident.
Accident, Preventable (Motor Vehicle)	A preventable accident is any occurrence involving a DDOT-owned or operated vehicle which results in property damage, personal injury, and/or fatality regardless of who was injured, what property was damaged, to what extent or where it occurred, in which the operator in question did not take every reasonable precaution to prevent the motor vehicle accident.
Damage	Includes damage to DDOT equipment whether it be contracted/owned/leased and any other property involved in the accident.
Fire	Uncontrolled combustion made evident by flame that requires suppression by equipment or personnel. When a fire is caused by a mechanical defect, the accident will be classified as a mechanical failure. The rationale for this being that the accident should be classified to reflect the initial condition that resulted in the accident.
Incident	An unforeseen event or occurrence, which does not result in death, injury, or property damage, or any combination thereof.
Injury	Includes physical harm or damage to a passenger(s), employee and/or others directly involved in an accident, or any combination thereof.

Term	Definition
Injury – Apparent	Any accident that causes any person to show evidence of an abrasion, bruise, swelling, burns, limping or obviously painful movement and/or bleeding wound, distorted member, etc. or causes any person to receive medical treatment at the scene of the accident or to be transported to a hospital of treatment.
Injury – Claimed	No apparent evidence of injury to any person involved in the accident by the observer but claimed by a person.
Injuries – Multiple	All accidents in which two (2) or more persons are injured.
Major Mechanical System Failure	A failure of some mechanical element of a revenue vehicle that prevents the vehicle from completing a scheduled revenue trip or from starting the next scheduled revenue trip because actual movement is limited or because of safety concerns.
Mechanical Failure Accident	An accident after investigation determined to be primarily caused by the failure of a component or assembly that causes the vehicle to malfunction regardless of whether the failure occurred because of human error, maintenance, or design deficiencies.
Near Miss	All incidents, which did not involve personal injury or damage to equipment or property but could have resulted in death or serious injury.
Property	Vehicles, equipment or other physical objects that are contracted/owned/leased by DDOT or others that were involved in an accident.
Preventable Letter	Letter delivered to an employee's supervisor when the PRC rates their accident as "Preventable". The letter is inclusive of findings and recommendations by the PRC.

Acronyms

Acronym/ Abbreviation	Definition
ARB	Accident Review Board
CSO	Chief Safety Officer
DDOT	Detroit Department of Transportation
FTA	Federal Transit Administration
JLMSC	Joint Labor-Management Safety Committee
NTD	National Transit Database
NSC	National Safety Council
PCR	Preventable Collision Rate
PRC	Preventable Review Committee
SRRP	Safety Risk Reduction Program
TAM	Transit Asset Management Plan
TEO	Transportation Equipment Operator

1 Mission Statement

The primary objective of the Detroit Department of Transportation (DDOT) Preventable Review Committee (PRC) is to provide support to enhance DDOTs Public Transportation Agency Safety Plan (PTASP).

In addition to this primary mission, the employees, and its service providers to participate in the safety process for the betterment of all concerned. The personal safety and health of each DDOT employee and service provider, safety to our customers, and the general public is of primary importance.

To the greatest degree possible, this Committee will provide a fair, transparent, and objective voice in determining in an accident was preventable or non-preventable. In carrying out its primary mission, the PRC is committed to 5 basic principles:

1. Find fact, not fault
2. Review all available statements and video/audio evidence (if available)
3. Consistent application of grading
4. Use the DDOT Guide to Determining the Preventability of Accidents
5. Inform employees of the accident rating

2 Purpose

This charter outlines the structure, composition, and procedures of DDOT's Preventable Review Committee (PRC) and Accident Review Board (ARB).

3 PRC and ARB Responsibilities

The PRC and ARB, as competent bodies, are solely responsible for determining the preventability of an accident. The committees do not look at legality of any action, only if the Operator did everything reasonable to avoid the accident/collision.

4 Review of the PRC and ARB Charters

The PRC and ARB charters will be reviewed and evaluated by the Joint Labor-Management Safety Committee (JLMSC):

1. On an annual basis.
2. When changes occur to applicable regulations, policies, rules, standard operating procedures, plans and/or best practices.

5 Preventable Review Committee Charter

The Preventable Review Committee (PRC) as a competent body, is responsible for determining the preventability of an accident involving DDOT personnel. Each meeting will be conducted in such a manner as to foster a productive work environment. The principal goal is to determine preventability, not legality.

5.1 PRC Composition

DDOT's Preventable Review Committee consists of a representation of frontline employees and management staff who are competent in the day-to-day operational flow of DDOT. Rotations are made to ensure that no one person is burdened and so that personnel can make a fair decision.

The PRC is comprised of the following members:

DDOT PRC Composition **Chair, **Co-Chair*
PRC Members: 1. *Chief Safety Officer 2. **Safety Manager 3. A rotating Vehicle Maintenance member 4. A rotating Administration member 5. A rotating Operations Superintendent member 6. A rotating Operations Training Center member 7. A rotating Road Operations member 8. A rotating Paratransit member 9. A rotating Labor Representative member

5.2 Attendance

All members are expected to attend the weekly PRC meetings. The following Division Heads are responsible for selecting and scheduling designees for rotating positions on a monthly basis:

Division Head	Designee Assignment to be Filled by Division Head
Deputy Director of Maintenance	Vehicle Maintenance member
Compliance Manager	Compliance member
Deputy Director of Operations	Operations Superintendent member Operations Training Center member Road Operations member
Executive Director of Paratransit	Paratransit member
President, ATU Local 26	Labor Representative member

Of the maximum nine (9) members, a minimum quorum of five (5) members will be required to commence proceedings at a PRC meeting.

5.3 Support Staff

Administrative support for the PRC will be provided by the Safety Division. This includes generating committee materials and maintaining records of accident ratings.

5.4 Principal Responsibilities

The principal responsibilities of the PRC are as follows:

1. The PRC Chair or Co-Chair organizes the meeting.
2. The PRC Chair or Co-Chair will chair the meeting.
3. Committee convenes weekly to conduct the PRC meeting.
4. Review all available statements and audio/visual evidence available.
5. Rate the accident as Preventable, Non-Preventable, or as an Incident.
6. Ratings are determined by majority vote.
7. Prepare recommendations for inclusion in Preventable Letters for employees

5.5 Confidentiality

All materials, content discussed, and recommendation resolutions are highly privileged and confidential. To ensure fairness, all personally identifiable information on all documentation as it relates to accidents presented before the committee will be redacted.

5.6 Use of Best Practices to Guide Decisions

The PRC will use the document, *DDOT Guide to Determine the Preventability of Accidents* to guide decisions where needed. This guide is derived from and mirrors the National Safety Council (NSC) publication, *A Guide to Determine Motor Vehicle Collision Preventability*.

See ***Appendix A: DDOT Guide to Determine the Preventability of Accidents***

5.7 Process

The PRC will use the following standardized methodologies to either rate the preventability of an accident or deem an event an incident.

5.7.1 Selection of Events for Review by the PRC

The PRC will review and rate accidents that took place during the preceding week. A week shall be defined as 12:00am Monday to 11:59pm Sunday. All accidents as reported within the CleverCAD Incident Management database will be presented before the committee. Additionally, if the Safety Division becomes aware of a Near-Miss event, the event will be presented to the committee to determine the preventability of the occurrence.

Near-Misses are not factored into the calculation of the Preventable Collision Rate (PCR).

5.7.2 Presentation of Accidents

Safety Division Support Staff will present accidents and identified near-misses to the PRC for rating in the following manner:

1. Read aloud the redacted dispatchers notes and responding service inspector notes derived from the applicable CleverCAD Incident Management report to describe the accident.

   If during the initial presentation of evidence, it is found that an event does not meet the threshold of an accident – as defined by policy, Safety Division Support Staff will ask the committee members whether or not the event should be deemed an incident. If the committee concurs, no further action is taken unless the committee agrees to recommend otherwise. Events deemed as incidents are not chargeable to employees, nor are they factored into the calculation of the Preventable Collision Rate (PCR).

2. Present photos captured by the responding service inspector,
3. Present audio/visual evidence, if available.
4. Pass the official voting record around the room. As the record circulates, committee members are permitted to engage in open discussion prior to deliberating. During this period, the committee may make recommendations for inclusion in the Preventable Letter if the accident is deemed as such.
5. Once all members have cast their vote on the official voting record and recommendations, if proposed, are documented, Safety Division Support Staff will collect all documentation related to the accident and file it for reconciliation at the conclusion of the meeting.
6. Repeat the above process for each accident on the docket.

5.7.3 Postponement of Accident Ratings Due to Inadequate Evidence

If by majority vote the committee feels there is inadequate evidence available to render a credible decision, committee members may vote to table an accident for presentation at the next PRC meeting so more evidence can be procured to make a credible decision.

5.7.4 Post-PRC Actions

Upon reconciliation of the official voting records, Safety Division Support Staff shall prepare Preventable Letters for accidents deemed as preventable. These letters, inclusive of findings and recommendations, will be delivered to the employee's Superintendent for the implementation of retraining and/or corrective action consistent with the employee's collective bargaining agreement and/or departmental policies, if applicable.

Additionally, if an accident is rated as non-preventable or deemed an incident but the committee agreed to make a recommendation based on the evidence presented, Safety Division Support Staff will communicate those recommendations to the employee's Superintendent for the implementation of retraining and/or corrective action consistent with the employee's collective bargaining agreement and/or departmental policies, if applicable.

5.8 Preventable Collision Rate (PCR)

The means of tracking system safety performance as it relates to revenue and non-revenue collisions will be the Preventable Collision Rate (PCR). The PCR is computed monthly and expressed as a numerical value and measured per 100,000 revenue miles:

Rate = # of preventable collisions x 100,000/Vehicle Revenue Miles (VRM)

Annually, the Joint Labor-Management Safety Committee (JLMSC) will review, evaluate, and set a target benchmark PCR goal for the year based on prior year trend analysis.

6 Accident Review Board Charter

The Accident Review Board (ARB) is the sole and appropriate medium where employees may appeal a "preventable" rating decision rendered by the PRC. ARB rulings are final and binding. Accident Review Board hearings must be requested in writing and addressed to the Chief Safety Officer within fourteen (14) calendar days of an employee receiving a Preventable Letter. Accidents with fixed objects are not eligible for Accident Review Board proceedings.

6.1 ARB Composition

DDOT's Accident Review Board consists of a representation of DDOT management, DDOT Labor Representatives, and a neutral third-party who are competent in the day-to-day operational flow of DDOT. Employees appealing the "Preventable" decision are permitted to attend. Rotations are made to ensure that no one person is burdened and so that personnel can make a fair decision.

The ARB is comprised of the following members:

DDOT ARB Composition **Chair, **Co-Chair*
ARB Members: 1. *Chief Safety Officer (**<u>*Does Not Vote*</u>**) 2. **Safety Manager (**<u>*Does Not Vote*</u>**) 3. A rotating Labor Representative member 4. A rotating Labor Representative member 5. A rotating Operations/Paratransit Management member 6. A rotating Vehicle Maintenance member 7. A rotating Detroit Police Department member

6.2 Scheduling ARB Hearings

Accident Review Board Hearings will be scheduled on the first Tuesday of the month. Submissions for ARB hearings must be received no later than 4:00pm on the 25th of the prior month to be scheduled, if the 25th falls on a holiday and/or weekend, the deadline will be the next business day. Employees will be notified through their respective superintendent's regarding ARB hearing appointments. Employees with just cause are permitted to reschedule their hearing date on one (1) occasion. If the employee does not show on the rescheduled date, the original PRC rating is final and binding.

6.3 Process

Each ARB proceeding will be conducted in such a manner as to foster a productive work environment. The principal goal is to determine whether or not the rating of "Preventable" was rooted in fact and in tandem with best practices.

6.3.1 Presentation of Accidents

Safety Division Support Staff will present accidents on the ARB docket in the following manner:

1. Read aloud the redacted dispatchers notes and responding service inspector notes derived from the applicable CleverCAD Incident Management report to describe the accident.
   Present photos captured by the responding service inspector,
2. Present audio/visual evidence, if available.
3. Pass the official voting record around the room.
4. Safety will leave the room.
5. As the record circulates, ARB members are permitted to engage in open discussion prior to deliberating.
6. Once all members have cast their vote on the official voting record Safety will return to the room.
7. The results will be conveyed by the neutral third-party.
8. Repeat the above process for each accident on the docket.

Appendix A: DDOT Guide to Determining the Preventability of Accidents

Guide to Determine Preventability of Accidents

From their initial date of employment, Transportation Equipment Operators are trained to be defensive drivers; first as student TEO's and then throughout their careers, in all retraining sessions, the importance of defensive driving is reinforced.

A Defensive Driver is one who is careful to commit no driving errors and makes allowances for the lack of skill, improper driving practice or attitude of the other motorist or pedestrian.

A Defensive Driver adjusts his/her own driving to compensate for unusual weather, road, and traffic conditions, and is not drawn into an accident by the unsafe actions of pedestrians and other drivers. By being alert to accident inducing situations, he/she recognizes the need for preventive action in advance and takes the necessary precaution to prevent the accident.

As a Defensive Driver, he/she knows when it is necessary to slow down, stop, or yield the right-of-way to avoid involvement.

Responsibility to prevent accidents is not based on who was primarily responsible or at fault. **Responsibility to prevent accidents goes beyond careful observance of traffic rules and regulations. Driver's must drive in a manner to prevent accidents, *regardless* of the other driver's faulty driving or non-observance of traffic laws.**

Each driver involved in an accident may have contributed to it to some degree. Admission of being at fault by the "other driver", or a record of the "other driver" being cited for a traffic violation, and witness or police statements for the driver are not by themselves final evidence to adjudge an accident as being "non-preventable." It may be possible that a driver contributed to the situation in some matter, either by his/her action or failure to act. *It must be decided that the driver did everything he/she reasonably could have done to prevent the accident.*

Accidents involve different factors; therefore, it is difficult to set hard and fast rules to classify them as preventable or non-preventable. Yet guidelines are necessary to ensure that these classifications are made ***uniformly*** and ***fairly***.

As one way to standardize our efforts in accident reduction, all PRC members involved in the bus accident rating process should give due consideration to the National Safety Council's Guidelines for rating accidents.

The following is a guide for use in determining the preventability of accidents, based on the National Safety Council's Program:

Definition of a Preventable Accident

A "Preventable" accident is an unforeseen event or occurrence, which causes property damage, personal injuries or fatalities, or any combination thereof. Regardless of who was injured, what property was damaged, to what extent or where it occurred, in which the individual in question did not take ***every*** reasonable precaution to prevent the accident.

Unless thorough investigation shows extenuating circumstances quite beyond the control of the driver, the following types of accidents will be regarded as "Preventable." This list has been prepared as a **guide** to help you determine whether an accident should be charged as "Preventable" on a driver's record.

Accidents at Intersections

a. **Driving Straight Through Intersection –** Collision with vehicles coming from either the left or the right, regardless of the presence or absence of stop signs or traffic lights, or whether the light was green or changing.
b. **Driving Straight Through Intersection –** Collision with approaching vehicle making a left turn in front of a DDOT vehicle.
c. **Starting Through Intersection When Light Changes –** Collision with cross traffic which has not cleared the intersection.
d. **Making a U-Turn**
e. **Making Right or Left Turns –** Collision with approaching or cross traffic. Collision with adjacent traffic even when the other vehicle is illegally passing at the intersection. Also, collision with a vehicle leaving curb as a driver makes a right turn.

Turning, like passing other vehicles, requires extreme caution by drivers. Avoiding "squeeze plays" caused by other vehicles, motorcycles, bicycles or pedestrians during left or right turns is the responsibility of the driver making the turn. Failure to signal, to properly position the vehicle for the turn, to check all rearview mirrors, to check pedestrian lanes, or to take any other defensive action should be considered during accident review. Accidents involving turns by other drivers should be examined in detail to ensure proper defensive driving action by the driver.

It is the driver's responsibility to approach, enter and cross intersections prepared to avoid accidents that might occur through the acts of another driver. The failure to be cautious and watchful prior to entering the intersection is a factor to be considered when making a decision.

When a driver enters an intersection, he/she should watch out for the obvious actions of the "other driver" that indicate a possible accident, such as excess speed, crossing the lane when turning, or coming from behind a blind spot. Complex traffic patterns, blind intersections or failure of the other driver to observe traffic controls or regulations is ***not*** an automatic cause for a "non-preventable" rating.

Backing Accidents

The care with which a vehicle is backed depends entirely on the driver's ability to make certain the way is clear. The driver is in no way relieved of his/her responsibility to act safely when someone guides them. A "backing guide" cannot control the movement of the vehicle; therefore, a driver must be sure of all clearances when backing.

Collision with the Vehicle Ahead

Regardless of the abrupt unexpected stop of the vehicle ahead, the driver can prevent front-end collisions by keeping a safe following distance and always maintaining control of his/her vehicle. The driver must be alert for possible obstructions in the roadway, either in plain view or hidden by the curve of a roadway and be prepared to stop. At night, speed should be controlled to allow for the reduction in visibility. Collisions of this type or considered "Preventable" because professional drivers should always follow at a safe distance and have their vehicle under control.

DDOT Vehicle Struck in Rear by Another

This type of accident will be considered "Preventable" when:

a. The driver was passing traffic when close to an intersection, then stopped suddenly at the intersection for a red light, stop sign, pedestrian or another vehicle.
b. The vehicle was improperly parked.
c. The vehicle rolled back in preparation for starting ahead.
d. The driver made a sudden stop to park, to load or unload passengers, for a grade crossing, or for similar reasons.

Drivers risk being struck from behind by failing to maintain a safe following distance; that is, driver's must maintain a safe distance to allow for a gradual stop even if the vehicle in front makes a sudden stop. Drivers must always properly signal their intentions.

Accidents While Passing or Being Passed

Drivers are required to overtake and pass safely, and not speed up when being passed. Failure to pass safely indicates possible faulty judgement or failure to consider one or more of the important factors involved in passing other vehicles. Passing is a voluntary maneuver and is the driver's responsibility.

Sideswipe and "cut-off" accidents may be prevented by a driver who yields to a passing vehicle by slowing down or moving to the where possible.

Accidents When Other Driver Enters the Main Road from Driveway, Alley or Side Street

Accidents involving traffic originating from alleys, driveways and entrances, and other special intersecting locations should be analyzed to find out what action the driver might have taken to avoid the accident. Did he/she slow down, sound a warning or yield to the other driver? These accidents may be prevented by defensive driving.

Weaving Right or Left

Failure to keep in line in multiple lane traffic. Some accidents may seem unavoidable if it appears that the other vehicle tried to pass through a space too narrow, when the space was made too narrow by the weaving of the driver.

A safe driver is rarely trapped in by another driver when changing lanes. They must use caution in merging traffic and be willing to yield for other vehicles or wait for a break in traffic.

Squeeze Plays and Shutouts

Usually due to the leading driver forcing the other driver to the left or right into parked vehicles, adjacent traffic, or off the road. Drivers should not get into a position where they may be forced into trouble, nor should they swerve to force others into trouble. These accidents can usually be avoided by yielding the way to the other vehicle.

Accidents When Pulling Away from the Curb or Other Parking Place

It is the responsibility of the driver to enter the flow of traffic safely. Drivers must use caution, signal properly, and check mirrors to ensure a safe, smooth merge into traffic.

Accidents When Entering Traffic from a Driveway, Alley or Side Street

It is the driver's responsibility to enter traffic safely from such locations.

Collisions with Vehicles from Opposite Directions

Includes both head-on and sideswipe conditions.

Even though a vehicle travelling in the opposite direction enters the driver's traffic lane, it may be possible to avoid a collision. For example, if the opposing vehicle was in a passing maneuver, the driver should try to slow down, stop, or move to the right to allow the vehicle to re-enter their lane.

Pedestrian Accidents

The unusual route of a pedestrian at mid-block or from between parked vehicles does not necessarily relieve a driver from taking action to prevent an accident. School zones, shopping areas, residential streets, and other areas with special pedestrian traffic must be traveled at reduced speed. Drivers must be aware of bicycles, motorcycles, and similar equipment generally operated by young and/or inexperienced operators. The driver who fails to reduce his/her speed when such vehicles are operated within their sight-distance has failed to take the necessary steps to prevent an accident. Keeping within posted speed limits is not taking the proper steps when unusual conditions call for reduction of speed.

Passenger Accidents

Whether resulting from sudden starts or stops, or other faulty driving practices. Passenger accidents are preventable when they are caused by faulty operation of the bus. Even though the mishap did not involve a collision of the bus, it should be considered preventable when the driver stops, turns, or accelerates suddenly. Emergency action taken by the driver to avoid a

collision that causes a passenger injury should be questioned to determine if proper defensive driving prior to the emergency would have eliminated the need for emergency action. The driver is also responsible for opening and closing all vehicle doors safely, ensuring the safe boarding and alighting of passengers.

Grade Crossing Collisions

Collisions with trains at grade crossings regardless of where the accident occurred should be deemed "Preventable". Trains always have the right-of-way. Extreme caution must be used and only after coming to a complete stop before the rails and determining if it is safe to cross.

Skidding Accidents

Drivers must always have their vehicle under control. This is accomplished by use of defensive driving techniques. Accidents in which your vehicle skids are preventable.

Non-Collision and Collision with Fixed Objects

Includes overturning in roadway, running off roadway, and collision with culvert, traffic signals, parked vehicles or other objects.

Collisions with fixed objects are preventable. They usually involve failure to check or properly judge clearances. New routes, holes in pavement, construction areas and similar situations are not in themselves valid reasons for excusing a driver from being at fault. The driver must be constantly on the lookout for such conditions and make the necessary allowances.

Accidents Due to Poor Visibility

Darkness, fog, rain, snow, sleet, glare, etc.; the burden of responsibility is placed on the driver to drive his/her vehicle within the limits of their ability to see ahead. Poor weather conditions are not in itself a valid excuse for being involved in an accident; such conditions do increase the hazards of driving and therefore, professional drivers must adjust their driving to these weather conditions. This must be taken into consideration when deciding the degree of preventability.

Accidents Due to Faulty Brakes

It is the driver's responsibility to report faulty brakes. It is also the responsibility of the driver to drive within the limits of the mechanical condition of the vehicle. This classification includes accidents caused by vehicles rolling away from a parked position due to failure to block the vehicle, to properly set the hand brake, air leak, etc.

Mechanical Failure

When the investigation of a "Mechanical Failure" accident shows that the mechanical failure which caused the accident was due to rough and abusive handling on the part of the operator, the resulting accident should be charged against them.

Any accident caused by a mechanical failure that could have been felt, seen, heard, or brought to the attention of the driver, and was not checked should be considered as preventable. It is

the driver's responsibility to report unsafe equipment and to request assistance via radio/telephone rather than continue in operation, which might cause an accident.

Yard and Terminal Accidents

The same rules apply regardless of where the vehicle is being operated. When operating on private property the driver is in no way relieved of his/her responsibility to operate safely.

More than One Employee Involved in Same Accident

A single accident involving two employees each driving a DDOT vehicle, may be charged as a preventable accident against the records of both employees. This will happen when investigation shows that both employees failed to drive to prevent the accident.

A preventable accident, in which two employees are in the same DDOT vehicle, is only charged to the employee who was driving the vehicle at the time of the accident.

Conclusion

A careful study of all conditions must be made to determine if the employee involved contributed to the situation by his/her action or failure to act. Unless thorough investigation shows that the driver involved could not have avoided the accident by reasonable defensive driving practices, accidents should be regarded as ***preventable***.

The key to what determines an accident preventable, or non-preventable is in the understanding of the following two concepts taken from the National Safety Council's Defensive Driving Course:

A. "A preventable accident is one in which you failed to do everything you reasonable could have done to prevent it."
B. "Defensive Driving is driving to prevent accidents in spite of the incorrect actions of others and adverse conditions."

Appendix F: MPO Communication: Safety Performance Targets

Safety Performance Targets 2025								
Provider	Mode of Transit Service	Fatalities Total	Fatalities /1M miles	Injuries Total	Injuries / 1M Miles	Safety Events Total	Safety Events / 1 M Miles	Mean Dist. Between Major Failures
DDOT	Fixed Route	0	0	≤133	≤1.32	≤66	≤0.66	≥9,366
	Paratransit	0	0	≤8	≤0.24	≤2	≤0.06	≥180,931