



**Montachusett Regional Transit Authority  
Public Transportation Agency Safety Plan**

**Revised September 2, 2025**

## **Introduction**

The following Public Transportation Agency Safety Plan (PTASP) details the safety processes and procedures for the Montachusett Regional Transit Authority (MART). This plan utilizes existing agency safety practices and best practices to be implemented to meet the new regulation set in the Federal Transit Administration Final National Public Safety Plan of April 10, 2024.

The PTASP includes formal documentation to guide the agency in proactive safety management policy, safety risk management, safety assurance, and safety promotion. The goal is to provide management and labor a comprehensive, collaborative approach to managing safety. The plan includes the process and schedule for an annual review of safety performance measures and to update processes that may be needed to advance the organization's safety practices.

## **Agency Background**

Located in the North Central region of the Commonwealth of Massachusetts, MART is a Regional Transit Authority that provides public transit services through contracts with private operators utilizing MART owned vehicles. Every five years, MART procures Management Services for operations of the transportation services detailed below, as stipulated in M.G.L 161B. The General Manager/Assistant General Managers (and all operations personnel such as drivers, mechanics, cleaners, fuelers, etc.) are contractors that are an integral part of the overall MART Operations and Management Team. Services include fixed-route bus, ADA complementary services for the disabled, Councils on Aging (COA), Subscription services, Evening Ride service (taxi & paratransit), regional bus/shuttle routes, and Dial-A-MART services, which are contracted with various human service agencies. MART's geographic service coverage is as follows:

- Fixed route bus service throughout the cities of Fitchburg, Leominster, and Gardner, as well as the Town of Athol with limited areas of service in the towns of Lancaster, Lunenburg, Phillipston, Templeton, Westminster, and Winchendon.
- ADA Service is available throughout the cities of Fitchburg, Gardner, and Leominster and  $\frac{3}{4}$  mile limit around the fixed bus routes in Athol, Lancaster, Lunenburg, Phillipston, Templeton, Westminster, and Winchendon.
- Peak hour on-demand service from Fitchburg/Leominster to Shirley, Devens and Ayer. These services are made possible through public-private partnerships.
- COA Para-transit services in 24 of 25 member communities including Ashburnham, Ashby, Athol, Ayer, Barre, Bolton, Boxborough, Fitchburg, Gardner, Hardwick, Harvard, Hubbardston, Lancaster, Leominster, Littleton, Lunenburg, Phillipston, Royalston, Shirley, Sterling, Stow, Templeton, Westminster, and Winchendon. Seventeen of these communities are provided with MART vans and operate the service themselves under a contract with MART. The three cities of Fitchburg, Leominster, and Gardner, as well as the towns of Ashby, Athol, Barre, Phillipston, and Royalston have opted for MART to run their COA service directly.

MART is one of two brokers of Human Service Transportation for the Commonwealth of Massachusetts, and serves 286 of 351 communities in Massachusetts, performing approximately 82% of the volume of trips statewide. As such, MART reports the Demand Taxi trips performed by the HST vendors in its service area to the NTD. However, since MART does not control the assets of these vendors, the vendors are not part of this safety plan. One aspect of the brokerage operation is program-based Routes that are bid out to transportation vendors. MART's Operating Company is one of these vendors on a significant number of the routes in its service area, which is the primary reason that an RTA of MART's size was required to do a Tier I Safety Plan. However, COVID drastically reduced the 60+ DDS routes in FY20 to around 30 DDS routes in FY22 34 DDS route in FY 25, plus other demand response services at MART

have seen a decrease in demand for MART's fare free system, there has been some increase to other demand response services. MART's daily VOMS in DR mode is approximately 90 vehicles.

## 1. Transit Agency Information

**Transit Agency Name:** Montachusett Regional Transit Authority

**Transit Agency Address:** 1427R Water Street, Fitchburg, MA 01420

**Name and Title of Accountable Executive:** Bruno Fisher, Administrator

**Name and Title of Chief Safety Officer:** Scott Rich, Assistant Administrator

**Mode(s) of Service Covered by this Plan:**

- Fixed Route
- Paratransit

**FTA Funding Types:** 5307/5310/5339

**Modes of Service provided by the Transit Agency (Directly Operated or Contracted Services):**

- Fixed Route
- Paratransit (including shuttle services)
- Subscription
- Contracted Service

**Does the Agency provide transit services on behalf of another transit agency or entity?** Yes

**Description of Arrangements:** MART provides demand-response and Human Service transportation services for various entities under EOHHS.

**Name and Address of Transit Agency(ies) or Entity(ies) for which services are provided:**

Executive Office of Health and Human Services  
Human Services Transportation Office  
100 Hancock Street, 8<sup>th</sup> Floor  
Quincy, MA 02171

Care Central VNA Healthcare, Inc.  
44 Pearly Lane  
Gardner, MA 01440

## 2. Safety Committee

### Safety Committee and Responsibilities

*Describe the minimum makeup and purpose of the Safety Committee*

The MART Safety Committee, per 49 USC § 5329 (d)(5)(A), shall be convened by a joint labor-management process, for which MART and the Amalgamated Transit Union Local 690 established an MOU. Per statute, the Safety Committee is made up of equal members of ATU 690 and Management Representatives. The committee and its governing rules are fully established in the MOU, which is attached to this plan for reference.

The Safety Committee members will be compensated as follows for their participation in PTASP functions. Union Representatives will be paid their normal hourly rate for PTASP Committee time spent,

and the Management Representatives as they are salaried employees of MART will have PTASP time spent treated as part of their position duties without additional compensation.

The Safety Committee, at a minimum, will be responsible for:

1. Identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment.
2. Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and
3. Identifying safety deficiencies for purposes of continuous improvement.

The Safety Committee will work with MART staff to update this document, approve the updated plan, and submit the plan to the MART Advisory Board for final approval.

**Date Safety Committee established: May 28, 2025** Updated MOU signed on **May 29, 2025**.

Committee Members	
Management Representatives	Union Representatives
Chief Safety Officer, Scott Rich	Union President, Alberto Rodriguez
General Manager, Melissa L'Ecuier	Driver Representative, Mike Wyman
Head of Security, Joaquin Kilson	Maintenance Representative, Albert Wornham
Marketing Coordinator, Josh Vander Baan	Driver Representative, Brad Barrows

### 3. Plan Development, Approval, and Updates

**Name of Entity that drafted this plan:** Montachusett Regional Transit Authority

**Date of Approval:** September 2, 2025

**Individual/Entity that approved this plan:** Scott Rich, Safety Committee Chairperson **Date of Approval:** September 2, 2025

**Approval by the Board of Directors or an equivalent Authority:** MART Advisory Board

**Date of Approval:** September 23, 2025

Signature of Accountable Executive: Bruno J. Fisher Date: 9/24/2025

**Certified by:** Bruno Fisher, Administrator on September 24, 2025

**Relevant Documentation (Title and Location):** FTA Certifications and Assurances, TrAMS/MART

#### Version and Updates

*Record the complete history of successive volumes of this plan*

Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	All	New Document	8/18/2020
1.1	3	Add approval updates above	11/19/2020
2.0	All	Updates due to change in Accountable Executive and changes in 49 USC § 5329	11/9/2022
2.1	Pages 3 and 4	Add approval updates above	12/13/2022
3.0	All	Reformat and update goals and associated accident data	11/30/2023
4.0	All	Updating document throughout, including safety developments, goals, and associated accident data. Document retention*	8/13/2024

5.0	All	Updating document throughout, including safety developments, goals, associated accident data, updated safety performance measures, and document safety retention records.	9/2/2025
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### Annual Review and Update of the Agency Safety Plan (ASP)

*Describe the process and timeline for conducting and annual review and update of the ASP*

This plan shall be reviewed on an annual basis to account for any updates to MART's safety policies and procedures. Each April, the Chief Safety Officer will initiate a review of the ASP, in consultation with the General Manager of the operating company. The Safety Committee will review their possible recommendations and conduct its own updates in accordance with their established responsibilities. By September 2025, an updated draft of the ASP shall be provided to the Accountable Executive for final review. The Advisory Board will vote to approve any changes prior to October 1. All changes will ultimately be approved by the Accountable Executive.

## 4. Risk Reduction Performance Targets

Safety Performance Measure		Description
1	Measure 1a – Major Events	This includes all safety and security major events as defined by the NTD.
2	Measure 1b – Major Event Rate	This includes all safety and security major events as defined by the NTD, divided by VRM.
3	<b>Measure 1.1 – Collision Rate (new)</b>	This includes all collisions reported to the NTD, divided by VRM.
4	<b>Measure 1.1.1 – Pedestrian Collision Rate (new)</b>	This includes all collisions “with a person,” as defined by the NTD, divided by VRM.
5	<b>Measure 1.1.2 – Vehicular Collision Rate (new)</b>	This includes all collisions “with a motor vehicle,” as defined by the NTD, divided by VRM.
6	Measure 2a – Fatalities	This includes all fatalities as defined by the NTD.
7	Measure 2b – Fatality Rate	This includes all fatalities as defined by the NTD, divided by VRM.
8	<b>Measure 2.1 – Transit Worker Fatality Rate (new)</b>	This includes all transit worker fatalities as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
9	Measure 3a – Injuries	This includes all injuries as defined by the NTD.
10	Measure 3b – Injury Rate	This includes all injuries as defined by the NTD, divided by VRM.
11	<b>Measure 3.1 – Transit Worker Injury Rate (new)</b>	This includes all transit worker injuries as defined by the NTD, including the categories “Transit Employee/Contractor,” “Transit Vehicle Operator,” and “Other Transit Staff,” divided by VRM.
12	<b>Measure 4a – Assaults on Transit Workers (new)</b>	This includes all assaults on transit workers as defined by the NTD. <sup>9</sup>
13	<b>Measure 4b – Rate of Assaults on Transit Workers (new)</b>	This includes all assaults on transit workers as defined by the NTD, <sup>9</sup> divided by VRM.
14	Measure 5 – System Reliability	This includes Major Mechanical System failures as defined by the NTD.

### **Risk Reduction Performance Targets**

*Specify performance targets developed for the risk reduction program*

<b>Category</b>	<b>Fixed Route</b>	<b>Demand Response</b>
<b>Collision Rate</b>	<b>4.51</b>	<b>8.98</b>
<b>Pedestrian Collision Rate</b>	<b>0.76</b>	<b>0</b>
<b>Vehicular Collision Rate</b>	<b>3.76</b>	<b>8.98</b>
Fatalities (Total)	<b>0</b>	<b>0</b>
Fatalities (3-year average)	<b>0</b>	<b>0</b>
Injuries (Total)	<b>5</b>	<b>6</b>
Injuries (Average)	<b>1.67</b>	<b>2.00</b>
Safety Events (Total)	<b>1</b>	<b>1</b>
Safety Events (Average)	<b>0.34</b>	<b>0.34</b>
Driver Assaults (Total)	<b>0</b>	<b>0</b>
System Reliability (Miles between failures)	<b>50,000</b>	<b>100,000</b>

*\*Rates are per 1,000,000 vehicle revenue miles*

OSONOC Events and Injuries (Other Safety Occurrence Not Otherwise Classified):

<b>Mode of Transit Service</b>	<b>Injuries* (Total)</b>	<b>Injuries (Rate)</b>	<b>Safety Events (Total)</b>	<b>Safety Events (Rate)</b>
Fixed Route	<b>5</b>	<b>1.67</b>	<b>1</b>	<b>.34</b>
Demand Response	<b>6</b>	<b>2.00</b>	<b>1</b>	<b>.34</b>

*\*Indicate that customer was transported by ambulance*

### **Safety Performance Measure Target Coordination**

*Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets*

The Accountable Executive shares our ASP, including safety performance targets, with the Metropolitan Planning Organization (MPO) in our service area each year after its formal adoption by the Advisory Board. MART's Accountable Executive also provides a copy of our formally adopted plan to the Massachusetts Department of Transportation (MassDOT). MART staff are available to coordinate with MassDOT and the MPO in the selection of MassDOT and MPO safety performance targets upon request.

### **Targets Transmitted to the State**

**State Entity Name:** Massachusetts Department of Transportation

**Date Submitted:** September 24, 2025

## **Targets Submitted to the MPOs**

**MPO Name:** Montachusett Regional Planning Commission

**Date Submitted:** September 24, 2025

## **5. Safety Management Policy**

### **Safety Management Policy Statement**

*Use the written statement of safety management policy, including safety objectives*

MART is committed to ensuring the safety of all passengers, employees, and contractors, as well as the public at large. The Authority has adopted the following safety objectives to guide the drafting and implementation of this Agency Safety Plan:

- Consistently provide safe, reliable, and efficient transportation service.
- Use all available means, including investing in advanced technological solutions, to detect safety hazards and unsafe conditions.
- Ensure the safety and security of all MART employees and contractors.

This plan aims to encapsulate the policies, priorities, and the tools for the agency to provide the safest transportation possible for MART's passengers, in addition to ensuring the safety and security of MART staff and contractors.

### **Safety Management Policy Communication**

*Describe how the safety management policy is communicated throughout the agency (include dates where applicable)*

Copies of the Agency Safety Plan are made available to staff and all contractors, and key safety policies are posted in common areas for both operations and maintenance staff. MART and our contractors will incorporate review and distribution of the Safety Management Policy Statement into new hire training. Ongoing Safety Committee meetings will be used to reinforce the safety policies for each employee, as well as to introduce the safety principles included in this plan.

### **Authorities, Accountabilities, and Responsibilities**

*Describe the role of the following individuals for the development and management of the transit agency's Safety Management System (SMS)*

#### ***Accountable Executive***

As MART's Administrator, the Accountable Executive has the authority to control and direct 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, and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

The responsibilities of the Accountable Executive include:

- Controlling and directing human and capital resources needed to develop and maintain the ASP and SMS.
- Designating and overseeing an adequately trained Chief Safety Officer who is a direct reporter.
- Ensuring that the SMS is effectively implemented.

#### ***Chief Safety Officer or SMS Executive***

As the Assistant Administrator, the Chief Safety Officer reports directly to the Accountable Executive and has the authority to direct implementation and operation of the SMS.

The Chief Safety Officer is responsible for:

- Developing and managing the ASP and SMS policies and procedures and keeping all policies and procedures up to date.
- Ensuring ongoing implementation and operation of the Safety Management System (SMS).
- Overseeing the Employee Safety Reporting Program and ensuring that a robust line of safety-related communication is consistently maintained.

### ***Agency Leadership and Executive Management***

Aside from MART's Accountable Executive and Chief Safety Officer, other executive managers with key safety-related responsibilities include the Head of Security, as well as the General Manager and Assistant General Managers from the Operating Management Company.

The responsibilities of this group include:

- Oversight of day-to-day operations and procedures related to the Safety Management System within each of their departments.
- Modification of policies and procedures to be consistent with SMS principles and implementation, as necessary.
- Oversight of employee reporting program and ensuring a consistent line of communication between front line employees and management concerning safety.

### ***Key Staff***

Key non-executive staff with significant safety responsibilities include the Safety Trainer, Head of Security, dispatchers, operators, and maintenance staff. While these employees have a diverse range of responsibilities, overarching shared safety-related responsibilities for this group include:

- Reporting any identified safety concerns to management in a timely fashion.
- Assessing service vehicles and facilities for hazards and defects.
- Following and abiding by all MART safety policies and acting in accordance with the principles of the SMS.

### **Employee Safety Reporting Program**

*Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded from protection)*

MART encourages staff to report any potential safety concerns verbally to management at any time. In general, front-line employees should report any unsafe conditions as potential hazards to their supervisors as soon as possible. Supervisors are responsible for relaying this information to the management level or to the Chief Safety Officer. When a concern reported by an employee is identified as a safety hazard, management will notify the Chief Safety Officer and General Manager.

As of May 1, 2025, MART began using Case IQ as the recording database for accidents and safety incidents. The database will be stored on a server so that there is access available to all parties, including Management and key staff.

Furthermore, employees are required to report any vehicle-related defects daily. For all safety hazards related to route conditions, employees shall complete a Route Hazard Assessment form.

When action is taken to address a concern identified by an employee report that results in changes in policies or procedures, employees will be notified by either:

- Bulletins posted in common areas.



- Periodic memoranda distributed to employees detailing actions taken and new safety procedures.
- New policies incorporated into the training program as applicable for reinforcement.

Employees that report safety concerns in good faith are protected from any retaliatory measures. These protections are detailed in MART's Employee Handbook, as well as the Management Company's Rules & Regulations for Employees. However, MTS and/or MART may take disciplinary actions if the report contains any of the following employee activities:

- Willful participation in illegal activities, such as assault or theft.
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk; or,
- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of alcohol or controlled substances.

## 6. Safety Risk Management

### Safety Risk Management Process

*Describe the Safety Risk Management Process, including:*

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards*
- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards*
- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment*

MART supports a decentralized approach to Safety Risk Management, with input from subject matter experts across different departments used to identify and assess potential safety hazards, as well as to suggest and implement mitigation strategies to reduce the level of risk posed by hazards. The Chief Safety Officer, along with the General Manager and Assistant General Managers, coordinate the risk management processes across the organization and provide guidance to managers on best practices for implementing mitigation strategies.

### *Safety Hazard Identification*

Managers at MART rely on a variety of sources to identify potential hazards that pose safety risks to the agency. These sources include:

- Accident reports
- Driver records
- Operations reports and vehicle inspections
- Customer complaints and service requests, which are thoroughly logged in an internal database
- Vehicle camera footage
- Employee reporting
- Maintenance reports
- External information, including reports from FTA and other oversight authorities, which provide information based on Federal, State, or local findings, research, considerations, or assessments

Staff are trained to identify common hazards and safety concerns, as well as new issues as they arise. The Chief Safety Officer frequently corresponds with the General Manager and Assistant General Manager to ensure that hazards are being identified and tracked. MART strives to continuously adapt by improving training for the identification of and response to hazards. All accidents are documented and tracked in detail through an internal Accident and Incident Spreadsheet, which includes information on time, date, conditions, cause, and preventability of all accidents and incidents. MART has also implemented a

MaintainX QR Code systems across multiple locations of our facilities where MART and Operating Company personnel can easily send safety-related or needed facilities repair issues via Smart phones to our maintenance team to address safety issues in a rapid fashion.

### ***Safety Risk Assessment***

Following the identification of safety hazards, assessment of risk is conducted on an ongoing basis by the Chief Safety Officer in consultation with the managers or owners of affected operations. Each hazard is analyzed based on the potential consequences the hazard could pose if not properly mitigated. The following matrices are used to guide discussions of the risk assessment of the consequences of hazards.

A. Categorize the Likelihood of Occurrence

5. Very High
4. High
3. Moderate
2. Low
1. Very Low

B. Categorize Level of Severity

- A. Negligible
- B. Could cause minor first aid treatment.
- C. May cause minor injury, or minor property damage.
- D. May cause severe injury or major property damage.
- E. May cause death or permanent injury destruction of property.

Likelihood	5	Very High					
	4	High					
	3	Moderate					
	2	Low					
	1	Very Low					
			Negligible	Could cause minor first aid treatment	May cause minor injury, or minor property damage	May cause severe injury or major property damage	May cause death or permanent injury or destruction of property
			A	B	C	D	E
			Severity				

Once the risk of a safety hazard is assessed, based on the suggested categorizations above, mitigation strategies that align with the severity and likelihood of the safety problem are determined. If a mitigation is already in place to address the potential consequence of a hazard, the effectiveness of this mitigation is factored into the risk assessment. This process will generally take place under the supervision of the Chief Safety Officer and General Manager.

### **Safety Risk Mitigation**

Once the risk of a safety hazard is identified, the Safety Risk Management Communication Committee is notified; this committee being the Chief Safety Officer, General Manager and Assistant General Managers, The Chief Safety Officer brings the details as to the mitigation strategies that have been discussed and reviewed by the managers or owners of the affected areas. The safety hazard identified is reviewed in comparison to the metrics and that align with the severity and likelihood of the safety problem. Any hazards that pose an immediate risk to operating safety are addressed immediately by the Chief Safety Officer and General Manager of each operation. For safety risk interventions that require

larger capital expenditures to address structural issues, the Chief Safety Officer, Managers or Owners will consult with the Accountable Executive to ensure that funds are readily available and can be used to effectively address the safety hazard identified.

Additionally, MART and its contractors will employ strategies to minimize the exposure of infectious diseases to the public, personnel, and property that are consistent with guidelines of the Centers for Disease Control and the Massachusetts Department of Public Health. MART during the height of the COVID-19 pandemic installed driver-barriers on all revenue service vehicles. This minimizes exposure between drivers and passengers, as well as reduces potential assaults to drivers. MART also cleans and sanitizes vehicles more than once a day, even while in service to mitigate the spread of disease through touch. MART continually monitors the rate of infectious disease through governmental information, and will reinstate additional measures performed (i.e., masks and social distancing) if necessary.

The Operating Company ensures that operator visibility inside MART vehicles is free and clear of equipment or other materials. Tablets, hardware, or the like are mounted above or below the windshield area within safe reach of the operator. Vehicle mirrors are adjusted so the drivers views are no obstructed by State inspection stickers on the windshields. Safety barriers are in place to reduce contact with passengers and can be positioned by the operator as needed to prevent obstructing their visibility and secured driver barriers have been added to three new buses. Yellow caution signs have been added to the rear of all vehicles reading “Caution: This vehicle makes sudden stops” to help warn other vehicle operators and reduce potential collisions. Bollards and additional caution signs have been added at our ITC facility to protect pedestrians and keep the public out of bus operation areas. Loose lug nut indicators have been added to vehicles as a high-visibility safety tool as a preventative to reduce accidents.

Cameras are installed in each vehicle with posted notice of recording in progress to help protect the driver and deter passengers from unwelcome or aggressive behavior. Audio has been added to our vehicle camera systems this year along with signage informing the public they are under video and audio surveillance as a preventative action to help reduce incidents of driver assaults.

In addition, MART’s Head of Security is in regular contact with drivers to address passenger situations which may be posing hazards to drivers or other riders to take appropriate actions to remedy potential incidents including no trespassing unruly passengers or involving local police departments to deal with the situations.

MART and our Operating and Management companies are reviewing future operator and pedestrian safety mitigation measures that include:

- Driver simulator equipment is being tested.
- On-Board Diagnostic (OBD) devices are being researched to engage in collision avoidance, blind spot detection, and operator behavior monitoring.
- Pedestrian and mirrorless camera systems are being reviewed.
- Our insurance carrier is being worked with to utilize additional tools and training programs to support.
- More emphasis is being placed on driver training and town halls emphasizing operator safety policies.
- Consistent enforcement by drivers of company policies regarding passengers is a focus topic to reduce driver assault from exceptions being made by some operators for certain policies such as pick up locations or bags being brought on vehicles.
- MART’s flag down boarding of passengers is being reviewed for conversion to a fixed stop system to help reduce vehicle and pedestrian accidents due to sudden stopping of vehicles.

## **Safety Set-Aside**

MART is a recipient receiving assistance under section 5307 that is serving an urbanized area with a population of 200,000 or more. Therefore, MART shall allocate not less than 0.75 percent of those funds to safety-related projects eligible under section 5307. If MART fails to meet its performance targets as defined in Section 3 above, then these funds will be used for projects that are reasonably likely to assist MART and its contractors in meeting the performance targets established, including modifications to rolling stock and de-escalation training.

## **7. Safety Assurance**

### **Safety Performance Monitoring and Measurement**

*Describe activities to monitor the system for compliance with procedures for operations and maintenance*

MART is committed to monitoring the operations of its contractors to ensure compliance with organizational procedures. The Chief Safety Officer is responsible for all monitoring and will frequently meet with the General Manager and Assistant General Managers to confirm compliance and offer any resources needed to implement SMS policies. MART uses the following procedures for ongoing monitoring of safety procedures:

- Ongoing inspections of vehicles and facilities
- Internal Safety Audits
- Analyzing operational and safety data to identify emerging safety concerns
- Job performance observations
- Tracking performance metrics

*Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended*

MART continuously monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The General Manager is responsible for implementing mitigation strategies that are effective and appropriate on a day-to-day basis. Through Safety Committee meetings with the Assistant General Manager, the Chief Safety Officer will ensure that these mitigations are working properly.

Implemented safety risk mitigations are frequently reviewed at scheduled safety and managerial meetings. If a mitigation is not working as intended, the Chief Safety Officer or General Manager will propose improvements to the identified mitigation or propose an alternative mitigation strategy altogether. The Chief Safety Officer will approve or modify this proposed course of action and ensure its execution, in consultation with the Accountable Executive and the Safety Committee.

Monitoring methods for safety risk mitigations include:

- Reviewing results from accident, incident, and occurrence investigations, and utilizing the accident/incident database to monitor trends over time.
- Monitoring employee safety reporting to determine if complaints persist after implementation of a mitigation strategy.
- Reviewing results of internal safety audits and inspections.
- Analyzing operational and safety data to identify emerging safety concerns.
- Job performance observations.

*Describe activities to conduct investigations of safety events, including the identification of causal factors*

Prompt and accurate investigations of all accidents, in accordance with written procedures for such investigations (see Appendix IV), incidents, and occurrences are conducted by supervisors to determine

the cause and to prevent reoccurrences. Appropriate management personnel will review the accident details to determine preventability as soon as reasonably possible. Both preventable and non-preventable accidents will be tracked within MART's Accident/Incident database to be implemented Q4 2024.

*Describe activities to monitor information reported through internal safety reporting programs*

The Chief Safety Officer, General Manager, and Assistant General Managers routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer will ensure that the concerns are investigated or analyzed through the SRM process. All managers and supervisors have the responsibility to communicate safety-related employee reports to the Chief Safety Officer and General Manager so any hazards can be properly documented.

### **Management of Change**

*Describe the process for identifying and assessing changes that may introduce new hazards or impact safety performance*

MART adopts a centralized approach to identifying and assessing changes that may introduce new hazards or impact safety performance. The Chief Safety Officer and the Compliance Officer assume primary responsibility for the identification of changes that may impact agency safety. Potential changes could include service changes, new vehicles or equipment, or other changes that are implemented for non-safety-related reasons. The CSO and Compliance Officer shall also bring these matters to the Safety Committee to determine if the future changes will have any impact on the operating company's safety performance.

When a change is determined to have a potential impact on the safety performance of the agency, it shall be assessed according to the procedures for Safety Risk Assessment laid out in Section 5 of this plan.

### **Continuous Improvement**

*Describe the process for assessing safety performance. Describe the process for developing and carrying out plans to address identified safety deficiencies*

MART is committed to consistently monitoring and tracking its safety-related performance and specifically understanding where there may be areas for future safety-related improvements. In addition to the metrics specified under "Risk Reduction Performance Targets" in Section 3, MART also tracks all accidents and incidents on a month-to-month basis, specifically tracks preventable accidents for both fixed-route and demand response services.

All procedures are monitored for deficiencies. When a deficiency is discovered in a specific department, the relevant manager shall work to correct the deficiency. In the case that the deficiency cannot be resolved immediately through existing measures, the deficiency shall be processed through the Safety Risk Management process described in Section 5. The Chief Safety Officer will review Management Company progress on continuous improvement with the General Manager during Safety Committee meetings.

## **8. Safety Promotion**

### **Competencies and Training**

*Describe the safety training program for all agency employees and contractors directly responsible for safety*

MART employs a comprehensive training program for all safety-related staff and contractors.

In addition to the training required below, all safety-related staff, including executive staff, are briefed on the components of the Safety Management System through completion of the Transit Safety Institute's SMS Awareness Course.

Required safety training for operators include:

- ADA/ Sensitivity Training – onset and annually
- First Aid/CPR – recertification every 2 years
- Wheelchair Training – onset and annually
- Pre-Trip Inspections – onset and annually
- Bus Lift Safety Video and daily Pre-inspections of lifts (when hired)
- Defensive Driving – onset and annually (or as required by Accident Review Committee)
- Distracted Driving – onset and annually
- Road Observation – onset and periodic (or as required for re-training)
- Biohazard/Pathogens/Infectious Diseases – onset and annually
- Drug & Alcohol (initial when hired)
- DDS Sensitivity/Sexual Harassment Training – onset and annually
- De-escalation/Assault Awareness Training – onset and annually
- Driver Fatigue/Mental Health Awareness – onset and annually

Required safety training for maintenance personnel include:

- OSHA Comprehensive Health and Safety Program
  - Eye and Face Protection
  - Ladder Safety
  - Hot Works Safety Certificate Program
  - Scissor Lift Training ANSI A92.6
  - Forklift Training
  - Hoisting License with yearly continued training
  - Bus Lift Safety Video and daily Pre-inspections of lifts
  - Noise Exposure
  - Fire Prevention Plan
  - Road-Call Procedures
  - Hazardous Communication Plan and SDS training
  - Allison Transmission Training
  - Cummins Engine On-line Training
  - Class C Operator Training for UST Program (to fuel vehicles)
  - Bus systems trainings from OEM's; includes electrical, axles, lifts, air system, brakes, suspension, etc.

Required safety training for Facility Maintenance Staff include:

- OSHA Comprehensive Health and Safety Program
- Eye and Face Protection
- Ladder Safety
- Scissor Lift Training ANSI A92.6
- MA Hoisting License with yearly continued training

Available training for Administrative Staff

- How to Safely use the AED Machines and administer CPR (Biennial)

## Safety Communication

*Describe processes and activities to communicate safety and safety performance information throughout the organization*

MART is committed to thoroughly communicating its safety policies, procedures, and performance, as well as ensuring that contractors are consistently conveying information related to hazards and safety risks relevant to employees' roles and responsibilities to its staff. Safety-related information is communicated to MART staff and contractors through a variety of channels, including:

- Frequent postings on the bulletin boards in the operators' room.
- Memos are distributed frequently to all operations and maintenance staff and frequently cover important safety policies and procedures.
- Periodic safety meetings where major safety policy and procedure updates are discussed, and in which minutes are recorded and made available to participants.

Additionally, when action is taken to address a concern identified by an employee report that results in changes in policies or procedures, employees will be notified by either:

- Bulletins posted in common areas.
- Periodic memoranda distributed to employees detailing actions taken and new safety procedures.
- New policies incorporated into the training program as applicable for reinforcement.

In addition to the safety communication methods listed above, the employee handbook covers safety-related responsibilities and requirements for employees.

## 9. PTASP Record Retention

**All records associated with the annual PTASP process will be retained by MART's policy of record retention below.** Records are currently being maintained by MART's Marketing Coordinator in MART's WFILE002-finance-01-FINANCE SHARED FILES-FY2025

### *I. Safety Records*

9.1	Public Transit Agency Safety Plan	Life of the plan plus 3 years
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## Additional Information

### Supporting Documentation

*Include or reference documentation used to implement and carry out the ASP that are not included elsewhere in this plan.*

- I. Appendix A.1 - Safety Committee MOU
- II. Appendix A.2 Version 4.0 Public Transit Agency Safety Plan
- III. Appendix A.3 Continuity of Operations Plan
- IV. Appendix A.4 Accident Investigation-Processing Procedures
- V. Appendix A.5 Procedures for Inspections of Vehicles Post-Accident

FTA Supporting Documentation:

## Definitions of Special Terms Used in the ASP

Term	Definition
Accident	Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
Accountable Executive	Single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan, in accordance with 49 U.S.C. 5326.
Equivalent Authority	Entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.
Event	Any Accident, Incident, or Occurrence.
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	Event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
Investigation	Process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
National Public Transportation Safety Plan	Plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53
Occurrence	Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
Operator of public transportation system	Provider of public transportation as defined under 49 U.S.C. 5302.
Performance measure	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	Quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
Public Transportation Agency Safety Plan (or Agency Safety Plan)	Documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
Risk	Composite of predicted severity and likelihood of the potential effect of a hazard.
Risk mitigation	Method or methods to eliminate or reduce the effects of hazards.
Safety assurance	Processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.



Safety Management Policy	Transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.
Safety Management System	Formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
Safety Performance Target	Performance target related to safety management activities.
Safety promotion	Combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
Safety risk assessment	Formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety risk management	Process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Serious injury	Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when 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 5 percent of the body surface.
Transit Agency	Operator of a public transportation system
Transit Asset Management Plan	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.

Acronym	Word or Phrase
ADA	Americans with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as PTASP in Part 673)
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
MassDOT	Massachusetts Department of Transportation
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
SRM	Safety Risk Management



## **I. Appendix A.1 – Safety Committee MOU**

# **Montachusett Regional Transit Authority Joint Labor-Management Safety Committee**

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## **MEMORANDUM OF UNDERSTANDING**

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The Montachusett Regional Transit Authority, (hereinafter referred to as MART), hereby establishes a joint labor-management safety committee (the Committee) pursuant to the federal Infrastructure Investment and Jobs Act (49 U.S.C. § 5329) in order to perform the tasks, set forth in that statute and to undertake any other work related to safety at MART (the system) that the committee might decide. This Memorandum will govern the Committee's structure and functions.

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### **Article 1: Name**

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The Committee will be known as the MART Safety Committee.

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### **Article 2: Purpose**

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The Committee's purpose is to facilitate cooperation between Management which is made of members of MART as an Authority and the contracted Management Company – HBSS Connect Corp. (dba Management of Transportation Services, Inc.) and Amalgamated Transit Union Local 690 (the Union) in safety matters including but not limited to reviewing, approving, and implementing changes to the Public Transit Agency Safety Plan (PTASP) that applies to the System; identifying and resolving hazards within the System; ensuring the effectiveness of safety policies and procedures that apply to the System; and fostering effective communication between the Management Company, the Union, and MART employees regarding safety matters.

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### **Article 3: Membership**

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The Committee will consist of 6 members, with equal representation from Management and the Union, each of which will select their own representatives. Both Management and the Union will decide unilaterally how each will select its representatives and how long those representatives will serve.

If a committee member is unable to attend a regularly scheduled committee meeting, Management or the Union - depending on which party the member represents - will choose an alternate to attend in the member's place.

If a vacancy occurs on the Committee, Management or the Union - depending on which party the departed member represented - will choose a replacement member by the date of the next regularly scheduled committee meeting or within thirty (30) calendar days, whichever occurs later.

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#### **Article 4: Leadership**

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The Committee will be led by two co-chairs: one chosen by Management from among its Committee representatives and one chosen by the Union from among its Committee representatives. The co-chairs will:

- Set the agenda of each Committee meeting and distribute it to all Committee members in advance
- Send reminder communications to all Committee members regarding the date, time, and location of each Committee meeting
- Facilitate each Committee meeting
- Coordinate the participation in a committee meeting of any outside safety experts or other guests whose presence the Committee requests
- For each Committee meeting, select a committee member who will take minutes
- Maintain copies of all Committee meeting minutes and of all other records created by the Committee
- Prepare any correspondence that will be sent or distributed on the Committee's behalf
- Perform any other tasks that the Committee might decide

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#### **Article 5: Responsibilities**

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The Committee will perform tasks including but not limited to:

- Identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through MART's safety risk assessment;
- Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended;
- Identifying safety deficiencies for purposes of continuous improvement;
- Oversee changes to the PTASP in accordance with the tasks identified here; and
- Approve the updated PTASP and make recommendations to the MART Advisory Board for approval of the updated PTASP.



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### **Article 6: Information Access**

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The Committee will have access to all documents, electronically stored information, and other records that are held or maintained either by Management or by the Union and that are reasonably relevant to the Committee's work. This provision will not require Management or the Union to disclose any information that is to remain confidential by law or under the collective bargaining agreement between Management and the Union.

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### **Article 7: Decision-Making**

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The Committee will make all decisions by majority vote. A quorum of 4 members must be present for the Committee to make a decision.

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### **Article 8: Meetings**

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The Committee will meet twice a year, more if needed to make updates to the PTASP. If the Committee finds it necessary to reschedule a meeting, the meeting will occur at a time decided upon by the Committee. Likewise, if the Committee finds that additional meetings are necessary, they will occur at times decided upon by the Committee. All Committee meetings will take place at the MART Headquarters building at 1427R Water Street - Fitchburg.

Management will not schedule any Union Committee member (or alternate, if applicable) to work during any Committee meeting or other pre-scheduled Committee activity. Management will pay each Union Committee member (or alternate) their regular wage rate during time required to attend Committee meetings.

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### **Article 10: Protection from Retaliation**

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Neither Management nor the Union will retaliate in any way against any Committee relative to their committee work. Likewise, neither Management nor the Union will retaliate in any way against any other person employed within the System relative to any assistance given by that person to the Committee.

Any Management employee and any member of the Union bargaining unit who believes that Management or the Union has violated this provision may seek a remedy via the contractual grievance and arbitration procedures in their collective bargaining agreement.

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### Article 11: Amendments

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The Committee may amend this Memorandum at any time.

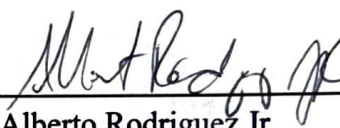
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### Article 12: Effective Date

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This Memorandum will become effective as soon as both an executive of MART and the Union President sign it. The Memorandum will remain in effect unless and until the Committee decides otherwise.

  
MART Executive

  
Alberto Rodriguez Jr.  
Amalgamated Transit  
President

5/29/25  
Date:

5/29/25  
Date:



## **Appendix A.2 Version 4.0 Public Transit Agency Safety Plan**

### **Montachusett Regional Transit Authority Public Transportation Agency Safety Plan**

**Revised August 13, 2024**

## Introduction

The following Public Transportation Agency Safety Plan (PTASP) details the safety processes and procedures for the Montachusett Regional Transit Authority (MART). This plan utilizes existing agency safety practices and best practices to be implemented to meet the new regulation set in 49 CFR Part 673.

The PTASP includes formal documentation to guide the agency in proactive safety management policy, safety risk management, safety assurance, and safety promotion. The goal is to provide management and labor a comprehensive, collaborative approach to managing safety. The plan includes the process and schedule for an annual review of safety performance measures and to update processes that may be needed to advance the organization's safety practices.

## Agency Background

Located in the North Central region of the Commonwealth of Massachusetts, MART is a Regional Transit Authority that provides public transit services through contracts with private operators utilizing MART owned vehicles. Every five years, MART procures Management Services for operations of the transportation services detailed below, as stipulated in M.G.L 161B. The General Manager/Assistant General Managers (and all operations personnel such as drivers, mechanics, cleaners, fuelers, etc.) are contractors that are an integral part of the overall MART Operations and Management Team. Services include fixed-route bus, ADA complementary services for the disabled, Councils on Aging (COA), Subscription services, Evening Ride service (taxi & paratransit), regional bus/shuttle routes, and Dial-A-MART services, which are contracted with various human service agencies. MART's geographic service coverage is as follows:

- Fixed route bus service throughout the cities of Fitchburg, Leominster, and Gardner, as well as the Town of Athol with limited areas of service in the towns of Lancaster, Lunenburg, Phillipston, Templeton, Westminster, and Winchendon.
- ADA Service is available throughout the cities of Fitchburg, Gardner, and Leominster and ¾ mile limit around the fixed bus routes in Athol, Lancaster, Lunenburg, Phillipston, Templeton, Westminster, and Winchendon.
- Peak hour on-demand service from Fitchburg/Leominster to Shirley, Devens and Ayer. These services are made possible through public-private partnerships.
- COA Para-transit services in 24 of 25 member communities including Ashburnham, Ashby, Athol, Ayer, Barre, Bolton, Boxborough, Fitchburg, Gardner, Hardwick, Harvard, Hubbardston, Lancaster, Leominster, Littleton, Lunenburg, Phillipston, Royalston, Shirley, Sterling, Stow, Templeton, Westminster, and Winchendon. Seventeen of these communities are provided with MART vans and operate the service themselves under a contract with MART. The three cities of Fitchburg, Leominster, and Gardner, as well as the towns of Ashby, Athol, Barre, Phillipston, and Royalston have opted for MART to run their COA service directly.

MART is one of two brokers of Human Service Transportation for the Commonwealth of Massachusetts, and serves 286 of 351 communities in Massachusetts, brokering approximately 82% of the volume of trips statewide. As such, MART reports the Demand Taxi trips performed by the HST vendors in its service area to NTD. However, since MART does not control the assets of these vendors, the vendors are not part of this safety plan. One aspect of the brokerage operation is program-based Routes that are bid out to transportation vendors. MART's Operating Company is one of these vendors on a significant number of the routes in its service area, which is the primary reason that an RTA of MART's size was required to do a Tier I Safety Plan. However, COVID drastically reduced the 60+ DDS routes in FY20 to around 30 DDS routes in FY22 34, plus other demand response services at MART have seen a decrease in demand. MART's daily VOMS in DR mode is approximately 90 vehicles.

## 1. Transit Agency Information

**Transit Agency Name:** Montachusett Regional Transit Authority

**Transit Agency Address:** 1427R Water Street, Fitchburg, MA 01420



**Name and Title of Accountable Executive:** Bruno Fisher, Administrator

**Name and Title of Chief Safety Officer:** Scott Rich, Assistant Administrator

**Mode(s) of Service Covered by this Plan:**

- Fixed Route
- Paratransit

**FTA Funding Types:** 5307/5310/5339

**Modes of Service provided by the Transit Agency (Directly Operated or Contracted Services):**

- Fixed Route
- Paratransit (including shuttle services)
- Subscription
- Contracted Service

**Does the Agency provide transit services on behalf of another transit agency or entity? Yes**

**Description of Arrangements:** MART provides demand-response and Human Service transportation services for various entities under EOHHS.

**Name and Address of Transit Agency(ies) or Entity(ies) for which services are provided:**

Executive Office of Health and Human Services  
Human Services Transportation Office  
100 Hancock Street, 8<sup>th</sup> Floor  
Quincy, MA 02171

Care Central VNA Healthcare, Inc.  
44 Pearly Lane  
Gardner, MA 01440

## **2. Safety Committee**

### **Safety Committee and Responsibilities**

*Describe the minimum makeup and purpose of the Safety Committee*

The MART Safety Committee, per 49 USC § 5329 (d)(5)(A), shall be convened by a joint labor-management process, for which MART and the Amalgamated Transit Union Local 690 established an MOU. Per statute, the Safety Committee is made of up equal members of ATU 690 and Management Representatives. The committee and its governing rules are fully established in the MOU, which is attached to this plan for reference.

The Safety Committee members will be compensated as follows for their participation in PTASP functions. Union Representatives will be paid their normal hourly rate for PTASP Committee time spent, and the Management Representatives as they are salaried employees of MART will have PTASP time spent treated as part of their position duties without additional compensation.

The Safety Committee, at a minimum, will be responsible for:

1. Identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment.
2. Identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and
3. Identifying safety deficiencies for purposes of continuous improvement.

The Safety Committee will work with MART staff to update this document, approve the updated plan, and submit the plan to the MART Advisory Board for final approval.

**Date Safety Committee established:** May 15, 2024 Updated MOU signed on June 26, 2024.

Committee Members	
Management Representatives	Union Representatives
Chief Safety Officer, Scott Rich	Union President, Bill Roy
General Manager, Melissa L'Ecuyer	Driver Representative, Mike Wyman
Head of Security, Joaquin Kilson	Maintenance Representative, Albert Wornham
Marketing Coordinator, Josh Vander Baan	Driver Representative, Brad Barrows

### 3. Plan Development, Approval, and Updates

**Name of Entity that drafted this plan:** Montachusett Regional Transit Authority

**Date of Approval:** August 13, 2024

**Individual/Entity that approved this plan:** Scott Rich, Safety Committee Chairperson

**Date of Approval:** August 13, 2024

**Approval by the Board of Directors or an equivalent Authority:** MART Advisory Board

**Date of Approval:** August 20, 2024 (MART meeting minutes, MART Headquarters Filing)

Signature of Accountable Executive: Bruno J. Fisher Date: 8/26/24

**Certified by:** Bruno Fisher, Administrator on August 26, 2024

**Relevant Documentation (Title and Location):** FTA Certifications and Assurances, TrAMS/MART

#### Version and Updates

*Record the complete history of successive volumes of this plan*

Version Number	Section/Pages Affected	Reason for Change	Date Issued
1	All	New Document	8/18/2020
1.1	3	Add approval updates above	11/19/2020
2.0	All	Updates due to change in Accountable Executive and changes in 49 USC § 5329	11/9/2022
2.1	Pages 3 and 4	Add approval updates above	12/13/2022
3.0	All	Reformat and update goals and associated accident data	11/30/2023
4.0	All	Updating document throughout, including safety developments, goals, and associated accident data.	8/13/2024

#### Annual Review and Update of the Agency Safety Plan (ASP)

*Describe the process and timeline for conducting an annual review and update of the ASP*

This plan shall be reviewed on an annual basis to account for any updates to MART's safety policies and procedures. Each April, the Chief Safety Officer will initiate a review of the ASP, in consultation with the General Manager of the operating company. The Safety Committee will review their possible recommendations and conduct its own updates in accordance with their established responsibilities. By July, an updated draft of the ASP shall be provided to the Accountable Executive

for final review. The Advisory Board will vote to approve any changes prior to October 1. All changes will ultimately be approved by the Accountable Executive.

## 4. Risk Reduction Performance Targets

### Risk Reduction Performance Targets

*Specify performance targets developed for the risk reduction program*

The targets below are based on the review of the previous three years of MART's safety performance data:

Mode of Transit Service	Fatalities (Total)	Fatalities (3-year average)	Injuries (Total)	Injuries (Average)	Safety Events (Total)	Safety Events (Average)	Driver Assaults (Total)	System Reliability (Miles between failures)
Fixed Route	0	0	5	1.67	1	.34	0	40,000
Demand Response	0	0	4	1.33	1	.34	0	100,000

*\*Rates are per 1,000,000 vehicle revenue miles*

OSONOC Events and Injuries (Other Safety Occurrence Not Otherwise Classified):

Mode of Transit Service	Injuries* (Total)	Injuries (Rate)	Safety Events (Total)	Safety Events (Rate)
Fixed Route	5	1.67	1	.34
Demand Response	4	1.33	1	.34

*\*Indicate that customer was transported by ambulance*

### Risk Reduction Performance Target Coordination

*Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets*

The Accountable Executive shares our ASP, including safety performance targets, with the Metropolitan Planning Organization (MPO) in our service area each year after its formal adoption by the Advisory Board. MART's Accountable Executive also provides a copy of our formally adopted plan to the Massachusetts Department of Transportation (MassDOT). MART staff are available to coordinate with MassDOT and the MPO in the selection of MassDOT and MPO safety performance targets upon request.

### Targets Transmitted to the State

**State Entity Name:** Massachusetts Department of Transportation

**Date Submitted:** August 26, 2024

### Targets Submitted to the MPO

**MPO Name:** Montachusett Regional Planning Commission

**Date Submitted:** August 26, 2024

## 5. Safety Management Policy

### Safety Management Policy Statement

*Use the written statement of safety management policy, including safety objectives*

MART is committed to ensuring the safety of all passengers, employees, and contractors, as well as the public at large. The Authority has adopted the following safety objectives to guide the drafting and implementation of this Agency Safety Plan:

- Consistently provide safe, reliable, and efficient transportation service.
- Use all available means, including investing in advanced technological solutions, to detect safety hazards and unsafe conditions.
- Ensure the safety and security of all MART employees and contractors.

This plan aims to encapsulate the policies, priorities, and the tools for the agency to provide the safest transportation possible for MART's passengers, in addition to ensuring the safety and security of MART staff and contractors.

### **Safety Management Policy Communication**

*Describe how the safety management policy is communicated throughout the agency (include dates where applicable)*

Copies of the Agency Safety Plan are made available to staff and all contractors, and key safety policies are posted in common areas for both operations and maintenance staff. MART and our contractors will incorporate review and distribution of the Safety Management Policy Statement into new hire training. Ongoing Safety Committee meetings will be used to reinforce the safety policies for each employee, as well as to introduce the safety principles included in this plan.

### **Authorities, Accountabilities, and Responsibilities**

*Describe the role of the following individuals for the development and management of the transit agency's Safety Management System (SMS)*

#### ***Accountable Executive***

As MART's Administrator, the Accountable Executive has the authority to control and direct 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, and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

The responsibilities of the Accountable Executive include:

- Controlling and directing human and capital resources needed to develop and maintain the ASP and SMS.
- Designating and overseeing an adequately trained Chief Safety Officer who is a direct reporter.
- Ensuring that the SMS is effectively implemented.

#### ***Chief Safety Officer or SMS Executive***

As the Assistant Administrator, the Chief Safety Officer reports directly to the Accountable Executive and has the authority to direct implementation and operation of the SMS.

The Chief Safety Officer is responsible for:

- Developing and managing the ASP and SMS policies and procedures and keeping all policies and procedures up to date.
- Ensuring ongoing implementation and operation of the Safety Management System (SMS).
- Overseeing the Employee Safety Reporting Program and ensuring that a robust line of safety-related communication is consistently maintained.

### ***Agency Leadership and Executive Management***

Aside from MART's Accountable Executive and Chief Safety Officer, other executive managers with key safety-related responsibilities include the Head of Security, as well as the General Manager and Assistant General Managers from the Operating Management Company.

The responsibilities of this group include:

- Oversight of day-to-day operations and procedures related to the Safety Management System within each of their departments.

- Modification of policies and procedures to be consistent with SMS principles and implementation, as necessary.
- Oversight of employee reporting program and ensuring a consistent line of communication between front line employees and management concerning safety.

### ***Key Staff***

Key non-executive staff with significant safety responsibilities include the Safety Trainer, Head of Security, dispatchers, operators, and maintenance staff. While these employees have a diverse range of responsibilities, overarching shared safety-related responsibilities for this group include:

- Reporting any identified safety concerns to management in a timely fashion.
- Assessing service vehicles and facilities for hazards and defects.
- Following and abiding by all MART safety policies and acting in accordance with the principles of the SMS.

### **Employee Safety Reporting Program**

*Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded from protection)*

MART encourages staff to report any potential safety concerns verbally to management at any time. In general, front-line employees should report any unsafe conditions as potential hazards to their supervisors as soon as possible. Supervisors are responsible for relaying this information to the management level or to the Chief Safety Officer. When a concern reported by an employee is identified as a safety hazard, management will notify the Chief Safety Officer and General Manager.

MART will place an application on the drivers' tablets, or on computers to which staff have access at each dispatch facility so that drivers, or any other employee, may access a database application that will be developed where incidents can be reported, and safety hazards may be identified. This will allow the employee to either remain anonymous or give an email address for follow-up if wanted. This also allows MART to incorporate a tracking system for incidents and safety hazards that does not currently exist since the current system is either on paper only or via word of mouth. The database will be stored on a server so that there is access available to all parties, including Management and key staff. MART is in final review stage implementation for a new software Case IQ for driver incident reporting with projected start date of Q4 2024.

Furthermore, employees are required to report any vehicle-related defects daily. For all safety hazards related to route conditions, employees shall complete a Route Hazard Assessment form.

When action is taken to address a concern identified by an employee report that results in changes in policies or procedures, employees will be notified by either:

- Bulletins posted in common areas.
- Periodic memoranda distributed to employees detailing actions taken and new safety procedures.
- New policies incorporated into the training program as applicable for reinforcement.

Employees that report safety concerns in good faith are protected from any retaliatory measures. These protections are detailed in MART's Employee Handbook, as well as the Management Company's Rules & Regulations for Employees. However, MTS and/or MART may take disciplinary actions if the report contains any of the following employee activities:

- Willful participation in illegal activities, such as assault or theft.
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk; or,
- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of alcohol or controlled substances.

## 6. Safety Risk Management

### Safety Risk Management Process

*Describe the Safety Risk Management Process, including:*

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards*
- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards*
- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment*

MART supports a decentralized approach to Safety Risk Management, with input from subject matter experts across different departments used to identify and assess potential safety hazards, as well as suggests and implements mitigation strategies to reduce the level of risk posed by hazards. The Chief Safety Officer, along with the General Manager and Assistant General Managers, coordinate the risk management processes across the organization and provide guidance to managers on best practices for implementing mitigation strategies.

### *Safety Hazard Identification*

Managers at MART rely on a variety of sources to identify potential hazards that pose safety risks to the agency. These sources include:

- Accident reports
- Driver records
- Operations reports and vehicle inspections
- Customer complaints and service requests, which are thoroughly logged in an internal database
- Vehicle camera footage
- Employee reporting
- Maintenance reports
- External information, including reports from FTA and other oversight authorities, which provide information based on Federal, State, or local findings, research, considerations, or assessments

Staff are trained to identify common hazards and safety concerns, as well as new issues as they arise. The Chief Safety Officer frequently corresponds with the General Manager and Assistant General Manager to ensure that hazards are being identified and tracked. MART strives to continuously adapt by improving training for the identification of and response to hazards. All accidents are documented and tracked in detail through an internal Accident and Incident Spreadsheet, which includes information on time, date, conditions, cause, and preventability of all accidents and incidents. MART has also implemented a MaintainX QR Code systems across multiple locations of our facilities where MART and our Operating Company personal can easily send safety related or needed facilities repair issues via Smart phones to our maintenance team to address safety issues in a rapid fashion.

### *Safety Risk Assessment*

Following the identification of safety hazards, assessment of risk is conducted on an ongoing basis by the Chief Safety Officer in consultation with the managers or owners of affected operations. Each hazard is analyzed based on the potential consequences the hazard could pose if not properly mitigated. The following matrices are used to guide discussions of the risk assessment of the consequences of hazards.

#### A. Categorize Level of Severity

1. Catastrophic - may cause death
2. Critical -may cause severe illness, severe injury, or major system loss
3. Marginal - may cause minor injury
4. Negligible - will not result in injury, illness, or system damage

## B. Categorize the Likelihood of Occurrence

1. Highly likely - frequent reoccurrence
2. Likely - expected occurrence
3. Unlikely- occurrence not expected

Once the risk of a safety hazard is assessed, based on the suggested categorizations above, mitigation strategies that align with the severity and likelihood of the safety problem are determined. If a mitigation is already in place to address the potential consequence of a hazard, the effectiveness of this mitigation is factored into the risk assessment. This process will generally take place under the supervision of the Chief Safety Officer and General Manager.

### **Safety Risk Mitigation**

Once the risk of a safety hazard is identified, the Safety Risk Management Communication Committee is notified; this committee being the Chief Safety Officer, General Manager and Assistant General Managers, The Chief Safety Officer brings the details as to the mitigation strategies that have been discussed and reviewed by the managers or owners of the affected areas. The safety hazard identified is reviewed in comparison to the metrics and that align with the severity and likelihood of the safety problem. Any hazards that pose an immediate risk to operating safety are addressed immediately by the Chief Safety Officer and General Manager of each operation. For safety risk interventions that require larger capital expenditures to address structural issues, the Chief Safety Officer, Managers or Owners will consult with the Accountable Executive to ensure that funds are readily available and can be used to effectively address the safety hazard identified.

Additionally, MART and its contractors will employ strategies to minimize the exposure of infectious diseases to the public, personnel, and property that are consistent with guidelines of the Centers for Disease Control and the Massachusetts Department of Public Health. MART during the height of the COVID-19 pandemic installed driver-barriers on all revenue service vehicles. This minimizes exposure between drivers and passengers, as well as reduces potential assaults to drivers. MART also cleans and sanitizes the vehicles more than once a day, even while in service to mitigate the spread of disease through touch. MART continually monitors the rate of infectious disease through governmental information, and will reinstate additional measures performed (i.e., masks and social distancing) if necessary.

The Operating Company ensures that operator visibility inside MART vehicles is free and clear of equipment or other materials. Tablets, hardware, or the like are mounted above or below the windshield area within safe reach of the operator. Inspection or other required stickers are placed out of the operators' line of vision as to not obstruct their mirrors or window view. Safety barriers are in place to reduce contact with passengers and can be positioned by the operator as needed to prevent obstructing their visibility.

Cameras are installed in each vehicle with posted notice of recording in progress to help protect the driver and deter passengers from unwelcome or aggressive behavior.

In addition, MART's Head of Security is in regular contact with drivers to address passenger situations which may be posing hazards to drivers or other riders to take appropriate actions to remedy potential incidents including no trespassing unruly passengers or involving local police departments to deal with the situations.

### **Safety Set-Aside**

MART is a recipient receiving assistance under section 5307 that is serving an urbanized area with a population of 200,000 or more. Therefore, MART shall allocate not less than 0.75 percent of those funds to safety-related projects eligible under section 5307. If MART fails to meet its performance targets as defined in Section 3 above, then these funds will be used for projects that are reasonably likely to assist MART and its contractors in meeting the performance targets established, including modifications to rolling stock and de-escalation training.

## **7. Safety Assurance**

### **Safety Performance Monitoring and Measurement**

*Describe activities to monitor the system for compliance with procedures for operations and maintenance*

MART is committed to monitoring the operations of its contractors to ensure compliance with organizational procedures. The Chief Safety Officer is responsible for all monitoring and will frequently meet with the General Manager and Assistant General Managers to confirm compliance and offer any resources needed to implement SMS policies. MART uses the following procedures for ongoing monitoring of safety procedures:

- Ongoing inspections of vehicles and facilities
- Internal Safety Audits
- Analyzing operational and safety data to identify emerging safety concerns
- Job performance observations
- Tracking performance metrics

*Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended*

MART continuously monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The General Manager is responsible for implementing mitigation strategies that are effective and appropriate on a day-to-day basis. Through Safety Committee meetings with the Assistant General Manager, the Chief Safety Officer will ensure that these mitigations are working properly.

Implemented safety risk mitigations are frequently reviewed at scheduled safety and managerial meetings. If a mitigation is not working as intended, the Chief Safety Officer or General Manager will propose improvements to the identified mitigation or propose an alternative mitigation strategy altogether. The Chief Safety Officer will approve or modify this proposed course of action and ensure its execution, in consultation with the Accountable Executive and the Safety Committee.

Monitoring methods for safety risk mitigations include:

- Reviewing results from accident, incident, and occurrence investigations, and utilizing the accident/incident database to monitor trends over time.
- Monitoring employee safety reporting to determine if complaints persist after implementation of a mitigation strategy.
- Reviewing results of internal safety audits and inspections.
- Analyzing operational and safety data to identify emerging safety concerns.
- Job performance observations.

*Describe activities to conduct investigations of safety events, including the identification of causal factors*

Prompt and accurate investigations of all accidents, in accordance with written procedures for such investigations (see Appendix IV), incidents, and occurrences are conducted by supervisors to determine the cause and to prevent reoccurrences. Appropriate management personnel will review the accident details to determine preventability as soon as reasonably possible. Both preventable and non-preventable accidents will be tracked within MART's Accident/Incident database to be implemented Q4 2024.

*Describe activities to monitor information reported through internal safety reporting programs*

The Chief Safety Officer, General Manager, and Assistant General Managers routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer will ensure that the concerns are investigated or analyzed through the SRM process. All managers and supervisors have the responsibility to communicate safety-related employee reports to the Chief Safety Officer and General Manager so any hazards can be properly documented.

## **Management of Change**

*Describe the process for identifying and assessing changes that may introduce new hazards or impact safety performance*



MART adopts a centralized approach to identifying and assessing changes that may introduce new hazards or impact safety performance. The Chief Safety Officer and the Compliance Officer assume primary responsibility for the identification of changes that may impact agency safety. Potential changes could include service changes, new vehicles or equipment, or other changes that are implemented for non-safety-related reasons. The CSO and Compliance Officer shall also bring these matters to the Safety Committee to determine if the future changes will have any impact on the operating company's safety performance.

When a change is determined to have a potential impact on the safety performance of the agency, it shall be assessed according to the procedures for Safety Risk Assessment laid out in Section 5 of this plan.

### **Continuous Improvement**

*Describe the process for assessing safety performance. Describe the process for developing and carrying out plans to address identified safety deficiencies*

MART is committed to consistently monitoring and tracking its safety-related performance and specifically understanding where there may be areas for future safety-related improvements. In addition to the metrics specified under "Risk Reduction Performance Targets" in Section 3, MART also tracks all accidents and incidents on a month-to-month basis, and specifically tracks preventable accidents for both fixed-route and demand response services.

All procedures are monitored for deficiencies. If any deficiencies are identified, they are corrected. When a deficiency is discovered in a specific department, the relevant manager shall reach out to the General Manager and Chief Safety Officer to inform them of the deficiency. In the case that the deficiency cannot be resolved immediately through existing measures, the deficiency shall be processed through the Safety Risk Management process described in Section 5. The Chief Safety Officer will review Management Company progress on continuous improvement with the General Manager during Safety Committee meetings.

## **8. Safety Promotion**

### **Competencies and Training**

*Describe the safety training program for all agency employees and contractors directly responsible for safety*

MART employs a comprehensive training program for all safety-related staff and contractors.

In addition to the required trainings below, all safety-related staff, including executive staff, are briefed on the components of the Safety Management System through completion of the Transit Safety Institute's SMS Awareness Course.

Required safety trainings for operators include:

- ADA/ Sensitivity Training – onset and annually
- First Aid/CPR – recertification every 2 years
- Wheelchair Training – onset and annually
- Pre-Trip Inspections – onset and annually
- Bus Lift Safety Video and daily Pre-inspections of lifts (when hired)
- Defensive Driving – onset and annually (or as required by Accident Review Committee)
- Biohazard/Pathogens/Infectious Diseases – onset and annually
- Drug & Alcohol (initial when hired)
- DDS Sensitivity/Sexual Harassment Training – onset and annually
- De-escalation Training – onset and annually
- Assault Awareness – onset and annually
- Driver Fatigue – onset and annually
- Emergency Evacuations – annually
- Mental Health Awareness -onset and annually

Required safety trainings for maintenance personnel include:

- OSHA Comprehensive Health and Safety Program
  - Eye and Face Protection
  - Ladder Safety
  - Hot Works Safety Certificate Program
  - Scissor Lift Training ANSI A92.6
  - Forklift Training
  - Hoisting License with yearly continued training
  - Bus Lift Safety Video and daily Pre-inspections of lifts
  - Noise Exposure
  - Fire Prevention Plan
  - Road-Call Procedures
  - Hazardous Communication Plan and SDS training
  - Allison Transmission Training
  - Cummins Engine On-line Training
  - Class C Operator Training for UST Program (to fuel vehicles)
  - Bus systems trainings from OEM's; includes electrical, axles, lifts, air system, brakes, suspension, etc.

Required safety trainings for Facility Maintenance Staff include:

- OSHA Comprehensive Health and Safety Program
- Eye and Face Protection
- Ladder Safety
- Scissor Lift Training ANSI A92.6
- MA Hoisting License with yearly continued training

Available trainings for Administrative Staff

- How to Safely use the AED Machines and administer CPR (Biennial)

### **Safety Communication**

*Describe processes and activities to communicate safety and safety performance information throughout the organization*

MART is committed to thoroughly communicating its safety policies, procedures, and performance, as well as ensuring that contractors are consistently conveying information related to hazards and safety risks relevant to employees' roles and responsibilities to its staff. Safety-related information is communicated to MART staff and contractors through a variety of channels, including:

- Frequent postings on the bulletin boards in the operators' room.
- Memos are distributed frequently to all operations and maintenance staff and frequently cover important safety policies and procedures.
- Periodic safety meetings where major safety policy and procedure updates are discussed, and in which minutes are recorded and made available to participants.

Additionally, when action is taken to address a concern identified by an employee report that results in changes in policies or procedures, employees will be notified by either:

- Bulletins posted in common areas.
- Periodic memoranda distributed to employees detailing actions taken and new safety procedures.
- New policies incorporated into the training program as applicable for reinforcement.

In addition to the safety communication methods listed above, the employee handbook covers safety-related responsibilities and requirements for employees.

## Additional Information

### Supporting Documentation

*Include or reference documentation used to implement and carry out the ASP that are not included elsewhere in this plan.*

- I. Appendix A.1 - Safety Committee MOU
- II. Appendix A.2 Version 3.0 Public Transit Agency Safety Plan
- III. Appendix A.3 Continuity of Operations Plan
- IV. Appendix A.4 Accident Investigation-Processing Procedures
- V. Appendix A.5 Procedures for Inspections of Vehicles Post-Accident

FTA Supporting Documentation:

Sample Safety Risk Assessment Matrices for Bus Transit Agencies

[sample-safety-risk-assessment-matrices-bus-transit-agencies.pdf](#)

Sample Hazard Classification System

[sample-hazard-classification-system.pdf](#)

### Definitions of Special Terms Used in the ASP

Term	Definition
Accident	Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
Accountable Executive	Single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan, in accordance with 49 U.S.C. 5326.
Equivalent Authority	Entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.
Event	Any Accident, Incident, or Occurrence.
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	Event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
Investigation	Process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.
National Public Transportation Safety Plan	Plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53
Occurrence	Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
Operator of public transportation system	Provider of public transportation as defined under 49 U.S.C. 5302.

Performance measure	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	Quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
Public Transportation Agency Safety Plan (or Agency Safety Plan)	Documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
Risk	Composite of predicted severity and likelihood of the potential effect of a hazard.
Risk mitigation	Method or methods to eliminate or reduce the effects of hazards.
Safety assurance	Processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
Safety Management Policy	Transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety.
Safety Management System	Formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
Safety Performance Target	Performance target related to safety management activities.
Safety promotion	Combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
Safety risk assessment	Formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety risk management	Process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Serious injury	Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when 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 5 percent of the body surface.
Transit Agency	Operator of a public transportation system
Transit Asset Management Plan	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.
Acronym	Word or Phrase
ADA	Americans with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as PTASP in Part 673)
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
MassDOT	Massachusetts Department of Transportation
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
SRM	Safety Risk Management



### **III. Appendix A.3**

## **Continuity of Operations Plan (COOP)**

## FOREWORD

Governmental departments and agencies have an ethical responsibility to ensure the safety of their employees. They also have a legal obligation to operate in a prudent and efficient manner, even during an impending threat or following a disaster.

This continuity of operations (COOP) plan provides guidance for the **Montachusett Regional Transit Authority** to perform its essential functions as part of a COOP capability.

Recommended changes to this document may be addressed, at any time, to the following points of contact:

**COOP POC:**

**Name:** Bruno Fisher

**Title:** Administrator

**Address:** 1427R Water St, Fitchburg, MA 01420

**E-mail:** bruno.fisher@mrta.us

**24 Phone:** 978-407-0432

### *I. Introduction*

The **Montachusett Regional Transit Authority** is the Commonwealth chartered agency responsible for provision of public transit in the North Central area of the Commonwealth including services throughout the Commonwealth. This transit agency includes both fixed route bus and para-transit van services. The **Montachusett Regional Transit Authority** is also the brokerage agency of two of the three Human Service Transportation areas throughout the Commonwealth. We are committed to providing the highest level of services and are always looking to expand through technological innovations in automation and coordination.

### *II. Purpose*

This continuity of operations (COOP) plan for the **Montachusett Regional Transit Authority**, hereinafter called MART, presents a management framework, establishes operational procedures to sustain essential functions, and guides the restoration of full functions if normal operations in one or more of MART's locations are not feasible.

This plan was prepared in accordance with Department of Homeland Security (DHS) Headquarters Continuity of Operations (COOP) Guidance Document, dated April 2004, which provides a structure for formulating a COOP; Presidential Decision Directive-67, "Ensuring Constitutional Government and Continuity of Government Operations," which requires all Federal departments and agencies to have a viable COOP capability; and Commonwealth of Massachusetts Executive Order No. 144, which requires all Commonwealth agencies to prepare for emergencies and disasters and to provide emergency liaisons to Massachusetts Emergency Management Agency/Organization for coordinating resources, training, and operations.

### *III. Applicability and Scope*

This document focuses on the basic COOP elements: essential functions, critical systems, alternative facilities, orders of succession, delegations of authority, and vital records. Development of procedures that address the basic COOP elements and work in concert with business continuity and disaster recovery plans allows for uninterrupted delivery of MART's essential functions.

This document applies to the full spectrum of threats and emergencies that may affect MART. Specifically, this COOP is based on an event scenario that disrupts MART's essential functions. In this scenario, a MART location is closed for normal business activities. The most likely causes of such disruption are severe winter storms (i.e., ice or snow), widespread utility failure, multiple explosions, civil disturbance, or credible threats of actions that would preclude access to or use of MART facilities. Under this scenario, MART offices relocate staff and resources to a remote facility identified as the Emergency Relocation Site (ERS).

#### *IV. Essential functions*

This COOP is based on MART's essential functions. It serves as an operational guide to facilitate the relocation of MART staff to an ERS and the backup of critical systems and vital records so that essential functions may continue. The level and manner of support needed to continue essential functions is dependent on the nature of an event. This plan describes the processes and procedures needed to support continuation of essential functions identified in the following table.

Priority	Essential Functions	Department	Responsibility	Restore Time
1	Safety of staff and operations	Safety & Security	Melissa LeCuyer	Min. 1 hour
2	Relocation of equipment (buses and vans) for use in operations	MTS	Melissa LeCuyer, Andy Divoll	Min. 1 hour
3	Continuation of services to frail and stranded patrons	MTS, MTG & DAM, Inc.	Dispatchers	As soon as conditions permit
4	Allowing access to equipment for emergency response agencies in the area	MTS	Melissa LeCuyer, Dispatch	Min. 1 hour
5	Reinstallation of all databases and MIS functions	MIS & HBSS	IT Staff	Min. 6 hours
6	Notification of new location to personnel and the public	Communications & Human Resources	Communications & Human Resources	Varies on situation
7	Banking and bill pay functions	Finance	Chief Financial Officer	Min. 1 hour

**Table 1**

A specific MART department oversees each essential function listed above, which, in turn, is supported by specific critical systems and/or vital records. Therefore, to maintain an operational status, MART must support the required department (staff), critical systems, and vital records at the ERS.

##### **A. Relationships**

Please enter the name of any agency for which you provide or are dependent on for services. These relationships should be taken into consideration when determining the priority of your essential functions.



## B. Relationship Matrix

Agency	Relationship	Service	Responsibility	Restore Time
MTS	Operating Company for Fitchburg/Leominster	Fixed Route	Maintenance, Dispatch & MIS	Minimum 1 hour
D-A-M Inc.	Operating Company for Fitchburg/Leominster	ADA, DAR, Sub-service	Maintenance, Dispatch & MIS	Minimum 1 hour
MTG	Operating Company in City of Gardner	Fixed Route, ADA, DAR, Sub-service	Maintenance, Dispatch & MIS	Minimum 1 hour
Area COA's	Member Community Client Advocate	DAR	Customer Service & MIS	Minimum 1 hour
FSU/MWCC	Community Sponsor	Fixed Route, Shuttle	Dispatch & MIS	Minimum 1 hour
VA	Client Advocate	Shuttle	Dispatch & MIS	Min. 1 hour
GVNA	Client Advocate	DAM Flex Route	Dispatch & MIS	Minimum 1 hour
CAFS	Client Advocate	DAM Flex Route	Dispatch & MIS	Minimum 1 hour
HST	Contracting Agency	Brokerage Services	MIS & HST Dept. Supervisors	Minimum 6 hours for MIS
DDS	HST Agency - Sponsor	Flex Route	DDS Manager & staff and MIS	Minimum 6 hours for MIS

Table 2

## V. Authorities and References

Authority, support, and justification for continuity of operations (COOP) planning are provided through the documents in Annex A.

## VI. Concept of Operations

A COOP must be maintained at a high level of preparedness and ready to be implemented without significant prior warning. It should be implemented fully no later than 12 hours after activation and provide guidance to sustain operations for up to 30 days. The broad objective of this COOP is to provide for the safety and well-being of MART employees and its patrons. In addition, this plan will facilitate the execution of MART's essential functions during any crisis or emergency in which one or more MART locations are threatened or not accessible. Specific MART COOP objectives include the following:

- Enable staff to perform essential functions to prepare for and respond to the full spectrum of possible threats or emergencies including terrorism, technological catastrophes, natural or manmade disasters, and other crises.
- Identify key principals and supporting staff who will relocate.
- Ensure that the Emergency Relocation Site (ERS) can support Emergency Relocation Group (ERG) operations.
- Protect and maintain vital records and critical systems.

An emergency, such as an explosion, fire, or hazardous materials incident, may require the evacuation of one or more MART locations with little or no advanced notice. Building evacuation, if required, is accomplished via implementation of Occupant Emergency Plans for each location. *This COOP is not an evacuation plan*, rather, it provides for a deliberate and preplanned movement of selected principals and supporting staff to the ERS.

Following an incident so severe that one or more MART locations are rendered unusable, or if such an event appears eminent, MART's Administrator will instruct the Senior COOP official(s) to activate the MART COOP. The Senior COOP Official deploys the appropriate members of the ERG.

### A. Phase I: Activation and Relocation

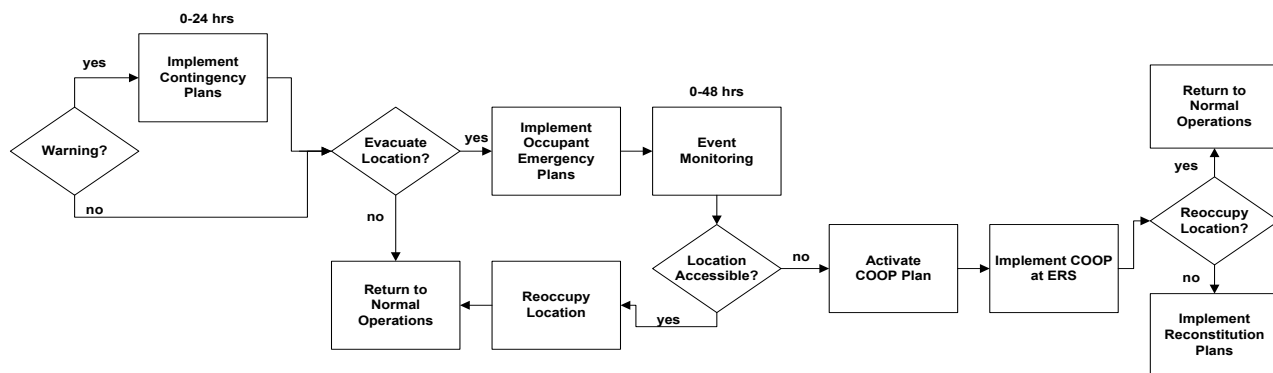


The extent to which orderly alert and notification is possible depends on the amount of warning received, whether personnel are on duty at MART locations, or off duty at home or elsewhere, and possibly the extent of risk for MART personnel or locations.

### 1. Decision Process

Execution of this COOP focuses on continuing MART's essential functions via the relocation of select personnel, ERS operations, and critical systems recovery. This COOP may be executed in several phases that are delimited by the time from warning dissemination and the activities being performed. Depicted below is MART's decision process.

Any disaster, whether natural, manmade, or technological, that adversely affects MART's ability to perform essential functions, requires activation of this plan.



### 2. Alert, Notification, and Implementation Process

MART staff will be contacted with alert and notification information using the following contact list, in the order listed:

- Bruno Fisher, MART Administrator, 978-407-0432
- Andrew Divoll, MTS Maintenance Manager, 978-874-0287
- David Gallant, MART IT Sr. System Administrator, 978-602-6582
- Stephen Oldfield Executive Director Brokerage Operations 978-424-8598
- Chastity Couvertier Manager Human Resources 978-602-5889
- Steve Bliss, Chief Financial Officer, 978-665-2268
- Joaquin Kilson, Security Manager, 978-790-1792
- MART Staff Emergency Telephone Directory – Annex E
- Local Officials Contact Directory – Annex E
- MTS Emergency Staff – Annex F
- Other Emergency Personnel or Organizations in our area – Annex G

**Note:** Information and guidance for MART members is normally relayed by network messages, e-mail, or phone using existing emergency calling plans. All members of the Emergency Relocation Group (ERG) will be notified initially by phone; however, other MART staff members will be notified via network alerts and/or public address announcements, as appropriate. Depending on the situation, current information may also be available via announcements released to and made by local radio and TV stations.

Employees should listen for specific instructions and specifically for the words “Emergency Personnel.” All MART employees should remain either at their office or at home until specific guidance is received.

### 3. Leadership

#### Orders of Succession

In the event of a vacancy in the position of Governor, or the absence of the incumbent in this position, another individual serving in an acting capacity shall temporarily assume the duties of the position. Article

LV of the Constitution of the Commonwealth of Massachusetts provides the following line of succession in the absence, death, or removal of the Governor:

- Lieutenant Governor
- Secretary of the Commonwealth
- Attorney General
- Treasurer and Receiver General
- Auditor

Following is the order of succession in the absence, death, or removal of the Administrator of the Montachusett Regional Transit Authority:

- Chairman MART Advisory Board
- Vice Chairman
- Deputy Administrator

Until appointment of an acting Administrator by the MART Advisory Board, responsibilities for operations are to be shared by:

- Deputy Administrator
- Chief Financial Officer

#### Delegations of Authority

The MART and its Administrator are charged with maintaining a comprehensive program of Continuity of Operations. This is carried out through execution of the following tasks:

- All tasks as directed through this and other documents to ensure the safety and security of staff and public.

Delegations of authority from the position of Administrator are established to ensure the ability of MART staff members to perform essential functions while remaining a viable part of the organization. Persons in the following positions, listed in order of precedence, are assigned continuity of operations responsibilities by the Administrator:

- General Manager
- Director of Brokerage Operations
- Assistant General Manager, Maintenance
- Information Technology

#### Devolution

Departure of ERG Advance Team:

The MART Administrator, or other person with delegated authority, directs the Senior COOP Official to begin the movement of the ERG.

- The Senior COOP Official notifies the Relocation Site Support Official that the ERG has departed.
- ERG members depart with their flyaway kits.
- The Senior COOP Official notifies other MART offices outside the affected area and clients, as appropriate, that the activation of the COOP is in progress.

Departure of Non-ERG MART Personnel:

At the time of an emergency notification, and in the absence of guidance to the contrary, non-ERG personnel present at each affected MART location are directed to go home to await further instructions.

Transition of Responsibilities to the Deployed ERG:

- Following arrival at the ERS the MART Administrator, or designee, orders the cessation of operations at the affected MART location(s).
- The Senior COOP Official notifies other offices outside the affected area that MART operations have shifted to the ERS.
- The Senior COOP Official notifies MART clients through the radio and other means that operations have shifted to the ERS.
- As appropriate, the Senior COOP Official, or designated representative, notifies vendors and other service providers that MART operations have been relocated temporarily and provides direction to either continue or temporarily suspend provision of service.

**B. Phase II: Alternate Facility Operations**

Alternative facilities (i.e. ERS's) must be capable of supporting operations in a threat-free environment in the event that essential functions and supporting staff are relocated to the site. A relocation site must have sufficient space and equipment to sustain operations for a period of up to 30 days. An ERS must also have the appropriate physical security and access controls. See Appendix B for details of alternative facilities (i.e. ERS's).

The Senior COOP Official, or designated alternate, conducts semi-annual reviews of the space allocations with each ERS Support Official to ensure the adequacy of space and other resources.

**1. Mission Critical Systems**

In general, the telecommunication and information system support provided at MART locations is available independently at the ERS. It is imperative that the Senior COOP Official ensures that unique or critical information system requirements are considered in planning and if appropriate, identified as capabilities to be provided by support organizations at the ERS.

**Table 3****2. Vital Files, Records, and Databases**

One COOP responsibility is to comply with the U.S. National Archives and Records Administration Code of Regulations, Subchapter B – Records Management, to ensure the protection and continuous availability of vital records. Vital records are documents, references, and records, regardless of media type, that are needed

System Name	Description	Current Location	Person Responsible	Backup (Location)
ITMS Booking System	Web-based applications used to book trips for Brokerage Operations	OCI Cloud	IT Department, HBSS, Call Center Manager, Brokerage Director	Oracle (OCI) replication from E. Coast to W. Coast (AZ) every minute.
ITMS HST Invoicing System	Database server and interface applications for brokerage billing	OCI Cloud	IT Department, HBSS, CFO	Oracle (OCI) replication from E. Coast to W. Coast (AZ) every minute
ITMS Scheduling System	Web-based application for scheduling trips with vendors	OCI Cloud	IT Department, HBSS, Scheduling	Oracle (OCI) replication from E. Coast to W. Coast (AZ) every minute
ITMS Ridership Reconciliation	Web-based applications used for Transit Operations	OCI Cloud	IT Department, HBSS, CFO	Oracle (OCI) replication from E. Coast to W. Coast (AZ) every minute
Accounting System	Accounting System, client-server, 16 users	OCI Cloud	IT Department, CFO	Local backup with remote backup to Water St.
Vehicle Maintenance	Database server and client interface (3) vehicle maint.	OCI Cloud	IT Department, Maintenance Manager	Local backup with remote daily backup at N. Main St.
Wide Area Network	Network of PCs (140), mobile devices (100)	All four locations – each have a subnet	IT Department	There are redundant Domain Controllers, routers, switches, firewalls. MART's MPLS network has redundancy provided by the provider.
Phone Systems	2 Virtualized systems, 10 virtualized servers supports 145 ext	100 Main St, 840 North Main St, 1427R Water St 500 Main St. Gardner Facility	IT Department	The Water & Main Street phone switches are configured for failover (backup) for each other.

to support essential functions under the full spectrum of emergencies and disasters.

All vital records must be protected from damage or destruction. MART's vital records are stored in fireproof cabinets. All databases and backup files are stored off site from the paper data. The Senior COOP Official is to

make certain that databases and other references supporting the essential functions of MART are prepositioned at each ERS, carried with deploying personnel, or available through a backup process.

Over time, vital records become outdated and require updating through a process called cycling. Inclusion of cycling procedures in the Vital Records Management Program ensures that vital records are current and accurate when needed.

Vital File, Record, or Database	Form of Record (e.g., hardcopy, electronic)	Pre-positioned at Alternate Facility	Hand Carried to Alternate Facility	Backed up at Third Location
Client & Trip Information (see DRP for details)	Both Hard and database stored	Yes	No	Yes
Payroll	Both Hard and electronic	Yes	No	Yes
Banking	Both Hard and electronic	Yes	No	Yes
AR/AP Information	Both Hard and electronic	Yes	No	Yes

**Table 4**

#### **C. Phase III: Reconstitution**

Within hours of relocating to the ERS, the Senior COOP Official, with the approval of Federal, Commonwealth, and local law enforcement and emergency services, initiates operations to salvage, restore, and recover the MART location(s). These reconstitution efforts generally begin when the MART Administrator, or other authorized person, ascertains, in coordination with Federal, Commonwealth, and local authorities that the emergency situation has ended and is unlikely to recur. However, once the appropriate MART official determines that the emergency has ended; immediate reconstitution may not be practical. Depending on the situation, one of the following options should be considered for implementation:

- Continue to operate from the ERS.
- Begin an orderly return to MART locations and reconstitute from remaining MART offices or other resources
- Begin to establish a reconstituted MART in some other facility.

## ***VII. COOP Planning Responsibilities***

#### **A. MART ADMINISTRATOR**

**Bruno Fisher, Administrator, 978-665-2263, [bruno.fisher@mrta.us](mailto:bruno.fisher@mrta.us)**

- Provides overall policy direction, guidance, and objectives for COOP planning.
- Provides policy direction, guidance, and objectives during an incident for the implementation of the COOP.
- Consults with and advises appropriate officials during implementation of the COOP.
- Serves as the principal MART representative to external parties and groups during implementation of the COOP.

#### **B. Senior COOP Official**

**Scott Rich, Deputy Administrator, 978-665-2245, [scott.rich@mrta.us](mailto:scott.rich@mrta.us)**

- Serves as the MART COOP program Point of Contact.
- Coordinates implementation of the COOP and initiates appropriate notifications inside and outside MART during COOP implementation.
- Coordinates the COOP Training, Testing, and Exercising Program.

- Aids ERG efforts at the ERS.
- Initiates recovery of MART, as part of reconstitution.

#### **C. ERS Support Official**

***Chastity Couvertier, Manager HR, 978-665-2271***

- Prepares site support plans to support the implementation of the COOP to facilitate the smooth transition of direction and operations from the MART location(s) to the ERS.
- Provides for the proper storage of backup copies of vital records and other pre-positioned items.
- Designates personnel responsible for assisting the arriving ERG Advance Team.
- Maintains a current roster of designated site support staff.
- Supports periodic coordination visits by MART offices.
- Keeps the Senior COOP Official informed of site vulnerabilities or changes in site resources that may impact the effective implementation of the COOP.
- Requests an annual security risk assessment of the ERS by security staff to assist in ensuring COOP relocation site readiness.
- Coordinates appropriate billeting arrangements with the ERS, if appropriate, for employees who will not commute and need to remain overnight near the ERS.
- Conducts periodic coordination visits to the ERS.
- Participates in scheduled tests, training, and exercises.

#### **D. Division Directors**

***Steve Bliss, Chief Financial Officer, 978-665-2268, [steve.bliss@mrta.us](mailto:steve.bliss@mrta.us)***

***Melissa L'Ecuyer, MTS Assistant General Manager, 978-665-2259, [melissa.lecuyer@mrta.us](mailto:melissa.lecuyer@mrta.us)***

***David Gallant, IT Sr. System Administrator, 978-602-6582, [david.gallant@mrta.us](mailto:david.gallant@mrta.us)***

***Stephen Oldfield, Executive Director Brokerage, 978-665-2849 [stephen.oldfield@mrta.us](mailto:stephen.oldfield@mrta.us)***

- Appoints a COOP point of contact for coordination and implementation of the COOP.
- Keep the Senior COOP Official informed of any changes in the designation of the office COOP point of contact.
- Identifies essential functions to be performed when any element of MART is relocated as part of the COOP.
- Identifies those functions that can be deferred or temporarily terminated in the event the COOP is implemented.
- Maintains a current roster of office personnel designated as ERG members.
- Maintains current personnel emergency notification and relocation rosters.
- Prepares backup copies or updates of vital records.
- Ensures that the time and attendance function is represented on the ERG.
- Designates personnel to assist security officials in securing office equipment and files at MART locations when implementing the COOP.
- Conducts periodic tests of the office telephone notification cascade(s).

#### **E. MART Staff**

- Review and understand the procedures for emergency evacuation of MART locations in the Occupant Emergency Plan.
- Review and understand responsibilities related to COOP support functions and performance of MART essential functions at a relocation site.
- Report to work to perform essential functions as detailed in this COOP or as requested.
- Provide current contact information to supervisors.

## ***VIII. Logistics***

#### **A. Alternate Location**

MART has designated one ERS to support the ERG following an event that disables the infrastructure supporting MART activities that occur at headquarters and/or regional offices. The ERS should be used when the headquarters and/or regional office buildings are closed for normal business activities. The relocation site has adequate space, the necessary equipment, and the connectivity to support relocating each ERG responsible for performing essential functions. See Annex B for Alternate Location details.

#### **B. Interoperable Communications**

The success of MART operations at the Emergency Relocation Site (ERS) depends upon the availability and redundancy of significant communication systems to support connectivity to internal organizations, other agencies, critical customers, and the public. Interoperable communication should provide a capability to correspond with MART's essential functions, to communicate with other Federal agencies, State agencies, and emergency support personnel, and to access other data and systems necessary to conduct all activities.

### ***IX. Test, Training, and Exercises***

A changing threat environment and recent events emphasize the need for COOP capabilities that enable MART to continue its essential functions across a broad spectrum of emergencies. Federal Preparedness Circular (FPC) 66, in accordance with FPC 65, states that testing, training, and exercising of COOP capabilities are necessary to demonstrate and improve the ability of agencies to execute their essential functions. The MART Tests, Training, and Exercises (TT&E) Program incorporates the three functional areas of testing systems and equipment, training personnel, and exercising plans and procedures.

### ***X. Multi-Year Strategy and program Management***

#### **A. Multiyear strategy**

The MART COOP Multiyear Strategy includes the objectives and key strategies for developing and maintaining a viable COOP program, including the support for short- and long-term initiatives.

#### **B. Program Management**

The Program Management Plan is a critical element of the MART's strategic planning activities because it documents the tactics executed to achieve the initiatives in the multiyear strategy. It describes the MART's needs, defines roles and responsibilities, and documents specific program timelines. In addition, it provides an effective program management tool for oversight, resource allocation, and progress evaluation.

### ***XI. COOP Maintenance***

To maintain viable COOP capabilities, MART is continually engaged in a process to designate essential functions and resources, define short- and long-term COOP goals and objectives, forecast budgetary requirements, anticipate and address issues and potential obstacles, and establish planning milestones. Following is a list of standardized list of activities necessary to monitor the dynamic elements of the MART COOP and the frequency of their occurrence.

Activity	Tasks	Frequency
Plan update and certification	<ul style="list-style-type: none"> <li>Review entire plan for accuracy.</li> <li>Incorporate lessons learned and changes in policy and philosophy.</li> <li>Manage distribution.</li> </ul>	Annually
Maintain orders of succession and delegations of authority	<ul style="list-style-type: none"> <li>Identify current incumbents.</li> <li>Update rosters and contact information.</li> </ul>	Semiannually

Activity	Tasks	Frequency
Maintain emergency relocation site readiness	<ul style="list-style-type: none"> <li>• Check all systems.</li> <li>• Verify accessibility.</li> <li>• Cycle supplies and equipment, as necessary.</li> </ul>	Monthly
Monitor and maintain vital records management program	<ul style="list-style-type: none"> <li>• Monitor volume of materials.</li> <li>• Update/remove files.</li> </ul>	Ongoing

**Table 5**



## ANNEX A: AUTHORITIES AND REFERENCES

Authority, support, and justification for continuity of operations (COOP) planning are provided through the documents listed below.

### Federal Guidance

**Executive Order 12148–Federal Emergency Management.** EO 12148 establishes Federal policies and coordinates civil emergency planning, management, and assistance functions. It also establishes the President’s role in working with State and local governments.

**Executive Order 12472–Establishment of the National Communications System.** EO 12472 establishes the National Communication Systems as a Federal interagency/Organization group assigned national security and emergency preparedness telecommunications responsibility throughout the full spectrum of emergencies. Responsibilities include planning, developing, and implementing enhancements to the national telecommunications infrastructure to achieve measurable improvements in survivability, interoperability, and operational effectiveness under all conditions. This is accomplished by effective management and by using national telecommunication resources to support the Government during any emergency.

**Executive Order 12656–Assignment of Emergency Preparedness Responsibilities.** EO 12656 is the foundation of these mandates. It requires Federal agencies to develop plans and procedures that ensure the survival of the U.S. Constitution and American Government by enabling them to continue to provide essential functions and services during and following a disaster or emergency. Executive Order 12656 assigns national security management preparedness responsibilities to Federal departments and agencies.

**Presidential Decision Directive 63.** PDD–63 is a national-level effort to ensure the security of the increasingly vulnerable and interconnected infrastructure of the United States. It requires departments and agencies to develop a plan for protecting critical infrastructures, including telecommunications, banking and finance, energy, transportation, and other essential functions and services. The directive addresses those services provided by Federal, State, and local governments.

**Presidential Decision Directive 67.** PDD–67 directs the Federal executive branch departments and agencies to have a viable COOP and capability. Departments and agencies must be able to operate at their alternative facilities with or without warning no longer than 12 hours after the disaster and to maintain sustained operations for a minimum period of up to 30 days. The plans identify those requirements necessary to support the primary functions, such as emergency communications, establishing a chain of command, and delegations of authority.

**Executive Order 13228–Establishing the Office of Homeland Security and the Homeland Security Council.** EO 13228 establishes the Office of Homeland Security in response to the terrorist attacks on September 11, 2001. Responsibilities of the office include developing and coordinating the implementation of a comprehensive national strategy to secure the United States from terrorist threats or attacks. The office shall coordinate the executive branch’s efforts to detect, prepare for, prevent, protect against, respond to, and recover from terrorist attacks within the United States.

**Executive Order 13231–Critical Infrastructure Protection in the Information Age.** EO 13231 establishes a protection program that consists of continual efforts to secure information systems for critical infrastructure that includes emergency preparedness communications. To achieve this policy, there will be a senior executive branch committee to coordinate that will have cognizance over all Federal efforts and programs involving continuity of operations, continuity of government, and Federal department and Agency/Organization information systems protection.

**Robert T. Stafford Disaster Relief and Emergency Assistance Act, Amended (U.S. Code Title 42 Section 5121).** This act provides for an orderly and continual means of assistance by the Federal Government to state and local governments for carrying out their responsibilities to alleviate the suffering and damage that result from disasters. 42 USC 5121 encourages the development of comprehensive disaster preparedness and assistance plans, programs, capabilities, and organizations by the States and local governments.

**U.S. National Archives & Records Administration (NARA) Code of Federal Regulations.** The NARA Code of Federal Regulations (CFR), Subchapter B, Records Management, provides guidance and prescribes policies for records management programs relating to record creation and maintenance, adequate documentation, and proper record disposition.

**Homeland Security Presidential Directive–1.** The Homeland Security Council (HSC) shall ensure coordination of all homeland security-related activities among executive departments and agencies and promote the effective development and implementation of all homeland security policies. The HSC Principals Committee (HSC/PC) shall be the senior interAgency/Organization forum under the HSC for homeland security issues. The HSC Deputies Committee (HSC/DC) shall serve as the senior sub-Cabinet interAgency/Organization forum for consideration of policy issues affecting homeland security. HSC Policy Coordination Committees (HSC/PCC) shall coordinate the development and implementation of homeland security policies by multiple departments and agencies throughout the Federal Government, and shall coordinate those policies with State and local government.

**Homeland Security Presidential Directive–3.** The Homeland Security Advisory System provides warnings in the form of a set of graduated “Threat Conditions” that would increase as the risk of the threat increases. At each threat condition, Federal departments and agencies implement a corresponding set of “Protective Measures” to further reduce vulnerability or increase response capability during a period of heightened alert. This system is intended to create a common vocabulary, context, and structure for an ongoing national discussion about the nature of the threats that confront the homeland and the appropriate measures that should be taken in response. It seeks to inform and facilitate decisions appropriate to different levels of government and to private citizens at home and at work.

**FEMA Federal Preparedness Circular (FPC) No. 65–Federal Executive Branch Continuity of Operations (COOP).** FPC 65 provides guidance to Federal executive branch departments and agencies for developing viable and executable contingency plans for continuity of operations. COOP planning facilitates the performance of department/Agency/Organization essential functions during any emergency or situation that may disrupt normal operations. FPC 65 requires that each Agency/Organization appoint a senior Federal Government executive as an emergency coordinator to serve as program manager and Agency/Organization point of contact for coordinating Agency/Organization COOP activities. This ensures continuous performance of an Agency/Organization’s essential functions during an emergency and protects essential facilities, equipment, records, and other assets. The actions recommended in FPC 65 will reduce disruptions to operations and loss of life, and minimize damage and losses. It achieves a timely and orderly recovery from an emergency and resumption of full service to customers.

**Federal Preparedness Circular No. 66–Test, Training and Exercise (TT&E) Program for Continuity of Operations (COOP).** FPC 66 provides guidance to Federal executive branch departments and agencies for use in developing viable and executable TT&E programs to support the implementation and validation of COOP’s. These activities are important elements of a comprehensive emergency preparedness program necessary to improve the ability of agencies to effectively manage and execute their COOP’s.

**Federal Preparedness Circular No. 67–Acquisition of Alternate Facilities for Continuity of Operations (COOP).** FPC 67 provides guidance to Federal executive branch departments and agencies for acquiring alternative facilities to support their COOP. FPC 67 requires agencies to designate alternative operating facilities as part of their COOP’s and prepare their personnel for the possibility of sudden relocation of essential functions or COOP contingency staff to these facilities should an emergency necessitate that action.

#### **Commonwealth of Massachusetts Guidance**

**Governor’s Executive Order No. 144.** EO 144 requires all Commonwealth Agencies to prepare for emergencies and disasters, and to provide emergency liaisons to the Massachusetts Emergency Management Agency/Organization for coordinating resources, training, and operations.

**Survivable Crisis Management Plan 1994.** The Commonwealth of Massachusetts Survivable Crisis Management (SCM) Plan provides the foundation and structural framework for managing the individual capabilities of the different agencies with emergency response and continuity of government responsibilities.

**Commonwealth of Massachusetts Chapter 639 of the Acts of 1950, Chapter 33.** The legislation provides basic Civil Defense / Emergency Management responsibilities for meeting dangers presented to the Commonwealth and its people

by emergencies and disasters. The document directs preparedness efforts related to common defense, protection of the public peace, health, security and safety.

## ANNEX B: ALTERNATE LOCATION/FACILITY INFORMATION

MART has designated one primary Emergency Relocation Site (ERS) to support the Emergency Relocation Group (ERG) following an event that disables the infrastructure supporting Agency/Organization activities that occur at headquarters and/or regional offices. The ERS should be used when the headquarters and/or regional office buildings are closed for normal business activities. The relocation site has adequate space, the necessary equipment, and the connectivity to support relocating each ERG responsible for performing essential functions.

Emergency Relocation Site Information	
Address	840 North Main Street, Leominster
Phone #	1-800-922-5636
Relocation Site Official	Melissa L'Ecuyer, General Manager
Directions	On Rte 12 at F/L town line
Map	<p>840 N Main St, Leominster, M... 840 N Main St Leominster, MA 01453</p> <p>Fitchburg Municipal Airport</p> <p>Leominster</p> <p>George Stanton Hwy</p> <p>Fitchburg</p> <p>Map showing the location of the Emergency Relocation Site at 840 North Main Street, Leominster, MA. The map includes surrounding streets and landmarks.</p>

## ANNEX C: DEFINITIONS AND ACRONYMS

The following terms or phrases are found in this document.

**Advance Team.** ERG personnel who immediately deploy to the Emergency Relocation Site (ERS) upon receiving a COOP warning or activation, to initiate actions at the ERS in preparation for the arrival of the main body of Emergency Personnel. Advance Team plus Emergency Personnel constitute an ERG.

**Business Continuity Plan (BCP).** The BCP provides procedures for sustaining an organization's business functions during and after a disruption. An example of a business function may be an organization's payroll process or consumer information process. A BCP may be written for a specific business process or may address all key business processes.

**Business Recovery Plan (BRP).** The BRP addresses the restoration of business processes after an emergency, but unlike the BCP, lacks procedures to ensure continuity of critical processes throughout an emergency or disruption.

**Continuity of Operations (COOP) Plan.** An action plan that provides for the immediate continuity of essential functions of an organization at an alternative facility for up to 30 days in the event an emergency prevents occupancy of its primary facility.

**Disaster Recovery Plan (DRP).** The DRP applies to major, usually catastrophic, events that deny access to the normal facility for an extended period. Frequently, DRP refers to an IT-focused plan designed to restore operability of the target system, application, or computer facility at a relocation site after an emergency.

**Emergency Personnel.** The key principals and staff members of the ERG, responsible for the execution of essential functions. Advance Team plus Emergency Personnel constitute an ERG.

**Emergency Relocation Group (ERG).** Pre-designated principals and staff who move to a relocation site to continue essential functions in the event that locations are threatened or incapacitated. The ERG comprises Advance Team plus Emergency Personnel.

**Emergency Relocation Site (ERS).** A remote alternative facility to which the ERG moves to continue essential functions in the event that traditional work sites are incapacitated.

**Essential functions.** Essential functions are those functions, stated or implied, that are required to be performed by statute or Executive order, or other functions deemed essential by the heads of principal organizational elements (i.e., administrators, office directors, and division directors).

**Occupant Emergency Plan (OEP).** The OEP provides the response procedures for occupants of a facility in the event a situation poses a threat to the health and safety of personnel, the environment, or property. Such events include a fire, hurricane, criminal attack, or a medical emergency.

**Point of Contact (POC).** The designated focal point for actions involving a specific plan, as in "COOP POC."

**Relocation Site (RS) Support Official.** Serves as the COOP point of contact at each ERS. Responsible for the readiness and operational condition of the ERS, as appropriate, including telecommunications, infrastructure, and equipment; and support the billeting and meal needs of the ERG.

**Senior COOP Official.** Serves as the COOP point of contact. Responsible for coordinating implementation of the COOP; initiating appropriate notifications inside and outside the Agency/Organization during COOP implementation; being the point of contact for all COOP training, testing, and exercising; assisting ERG efforts at the ERS; and initiating recovery of the Agency/Organization as part of reconstitution.

## **ANNEX D: MART MIS BACKUP PLANS AND STRATEGIES**

The Montachusett Regional Transit Authority (MART) Brokerage operations are cloud based using Oracle Cloud Infrastructure. (OCI)

The process is monitored by our third-party MSP, if any failure during process our third-party MSP notifies IT electronically. IT then will review the cause and generate additional backup.

Additionally, our Brokerage Operations DR consists of using Oracle's Data Guard. If the production database becomes unavailable, for any reason, client connections quickly, and in some configurations transparently, failover to a synchronized replica to immediately restore services. This provides both high availability and data protection for Oracle in the event of database, cluster, site, region or geographic outage.

## ANNEX E: EMPLOYEE CONTACTS, ERG GROUPS AND MART ADVISORY BOARD

The following list is employees with MART cell phones for emergency notification:

Bruno Fisher, Deputy Administrator, 978-407-0432  
 Steve Bliss, Chief Financial Officer, 978-665-2268  
 David Gallant, IT Sr. System Administrator, 978-602-6582  
 Fatima Rivera, Assistant Director Program Based, 978-400-6036  
 Stephen Oldfield, Executive Director Brokerage, 978-424-8598

These department managers would be responsible for notifying their employees. An employee emergency information line has also been established.

The following staff is designated as emergency personnel and makeup the Emergency Response Groups:

<b>CALL CENTER/BROKERAGE:</b>	<b>PROGRAM MANAGEMENT:</b>
Nicole Wislocki	Denise Delorme
Amanda Kukta	Jessica Forrest
	Stephanie Richard
<b>SCHEDULING/BROKERAGE:</b>	<b>ADMINISTRATION:</b>
Amy Wesson	Maria Maldonado
Evelyn Bard	
<b>COMPLAINTS/BROKERAGE:</b>	<b>FINANCE:</b>
Joanne Norris	Jessica Lashua
	<b>IT DEPARTMENT – ALL MEMBERS</b>

The following contacts are the 2024 MART Advisory Board Members. In the case of an emergency the mayors of the three cities would always be notified; other selectmen would be notified when service in their communities is affected.

## MART Advisory Board Members - 2024

### Mayors

**Mayor Michael Nicholson** - 95 Pleasant Street, Gardner, MA 01440

**Mayor Samantha M. Squailia** - 718 Main Street, Fitchburg, MA 01420

**Mayor Dean Mazzarella** - 25 West Street, Leominster, MA 01453

### Other Members (Alphabetical Order)

**Adam Lamontagne** - 160 Patriots Road, P.O. Box 620, East Templeton, MA 01438

**Alexandra Turner** - 695 Main Street, Lancaster, MA 01523

**Alyson Toole** - 509 Great Road, Stow, MA 01775

**April-Lynn Forest** - Ashby Council on Aging, 895 Main Street, Ashby, MA 01431

**Board of Selectmen** - 37 Shattuck Street, Littleton, MA 01460

**Board of Selectmen** - 7 Keady Way, Shirley, MA 01464

**Caesar Nuzzolo** - 17 Main Street, P.O. Box 135, Lunenburg, MA 01462-0135

**Carter Terenzini** - 29 Middle Road, Boxborough, MA 01719

**Chaz Sexton-Diranian** - 272 Main Street, Townsend, MA 01469

**Heather Billings (Select)** - 11 South Street, Westminster, MA 01473

**Janet Robbins** - 32 Main Street, Ashburnham, MA 01430

**Jessica Stizer** - Henry Woods Building, 40 West Street, Suite 697, Barre, MA 01005

**Kathy Black (ADA Rep)** - Seven Hills Family Services, 1460 John Fitch Highway,  
Fitchburg, MA 01420 **Kenneth Troup** - 663 Main Street, Bolton, MA 01740

**Kim Dee** - Board of Selectmen, 50 The Common, Phillipston, MA 01331

**Lisa Marrone** - 19 Mortimer Road, Sterling, MA 01564

**Mitchell Grosky** - 584 Main Street Rm 24, Athol, MA 01331

**Nathan Boudreau** - 7 Main Street Unit 3, Hubbardston, MA 01452

**Richard Martin** - 54 NE Fitzwilliam Road, Royalston, MA 01368

**Richard Ward** - 109 Front Street, Winchendon, MA 01475

**Robert Pontbriand** - 1 Main Street, Ayer, MA 01432

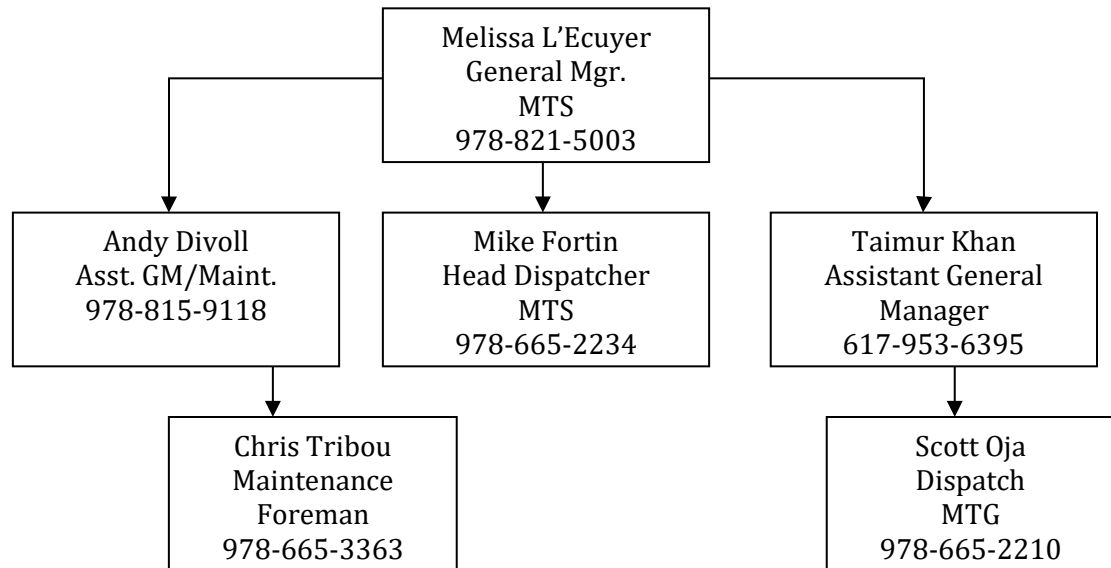
**Sharon Hardaker** - 307 Main Street, Gilbertville, MA 01031

**Tim Bragan** - 13 Ayer Road, Harvard, MA 01451



## ANNEX F: MTS, MTS2 AND MTG EMPLOYEE CONTACTS

The following list is the operating company's employee telephone tree for emergency notification:



These supervisors are then responsible for calling the drivers, mechanics, cleaners and office staff.

## **ANNEX G: INFORMATION FOR OTHER EMERGENCY CONTACTS**

A number of different agencies depend on MART's Operations for the transportation of their clients. MART has a number of vendors who provide service for us who would need to be notified if MART were to be put the COOP into action. MART also has tenants that occupy space in three of our facilities. The following is a list of contacts to notify.

### **Agencies:**

- MassHealth – 800-841-2900
- HST Office – Sandy Mulcahy - 617-847-6559
- Gardner VNA – Cindy – 978-342-9428
- CAFS – 978-345-7409
- Fitchburg State University, Campus Police – 978-665-3584

### **Vendors:**

- Leominster Taxi (JARC) – 978-534-5570
- HBSS (Systems Consultant) – Himanshu Bhatnagar – 978-379-0010
- Systems Engineering (Managed Service Provider) – 888-624-6737

Assorted list of around 200 vendors who provide for our brokerage transportation – ERS personnel would be responsible to call.

### **Tenants:**

- City Cab – 978-345-4381
- Fuzzy's Café – Mike Voisine, 508-331-6099
- Fitchburg State University – Jay Bry – 978-665-3131
- Mera's Cakes, Inc. – 978-394-5356



## IV. Appendix A.4 Accident Investigation-Processing Procedures

### Vehicle Accident Investigation/Filing/Reporting/Recording Procedures:

***Depending on the accident severity level, the below represents the basic procedures for “non-urgent” vehicle accidents. Any serious vehicle accident involving injury, vehicle towing, etc. would be brought to the immediate attention of either the General Manager or Assistant General Managers by verbal communication.***

Step 1: Receive accident email notification from Case IQ system after input by dispatch and a copy of vehicle’s video request form sent to garage by dispatch

Step 2: Receive accident report from driver, review for accuracy and details pertaining to the cause. Fill in missing vehicle information, as necessary. Return to driver for any further completion/correction, as needed. Add completed report to the Case IQ log

Step 3: Review/Save video - making a notation if any information that differs from the report, if the card was able to be saved or not and the reason. Return card to garage for formatting once done

Step 3: Inform Melissa if there is any concerning information or unusual circumstances based on the video or report

Step 4: After review, type applicable discipline letters for any “at fault” accidents. Make Trainer/Management aware of any required retraining based on accident circumstances or step in the progressive track

Step 5: Email the completed report to MMA based on appraisal advisement from Maintenance Management, cc Maintenance Manager on that email. Keep copy of sent email with original report

Step 6: Any off MART property accidents are sent to: registry and police in applicable city where accident occurred

Step 7: Store the original report along with internal incident report and video request form in blue the accident review file

Step 10: Type out accident review meeting posting, 1 week prior to monthly meeting, after scheduling with designated members of the Accident Review Committee

Step 11: After the monthly accident review meeting, type letters to employees with review results

Step 12: Store a copy from the accident report and review letter in the Accident Binder

Step 13: Complete “Breakdown of Accidents” log. Print current year for front of accident binder and email log to designated MART staff

Step 14: Update points log for each employee



## V. Appendix A.5

### **\*\*Procedures for Inspection of Vehicles Post-Accident\*\***

The following timeline of events represents the basic procedures for inspection of vehicles post-accident in coordination with the Vehicle Accident Investigation Procedures.

When the vehicle is returned to MART's maintenance facility, whether delivered by tow truck or driven into the premises, the vehicle is visually inspected by the Assistant GM of Maintenance or a technician.

The technician removes the camera card when the request is received from dispatch, and it is sent to the MTS office. The camera card is saved to a computer. Once the video footage is reviewed and saved, the card is returned to the Maintenance Department and reformatted for future use.

Maintenance staff will photograph MART's vehicle, and any other vehicles involved, if possible. Photos are available in the accident file.

If the vehicle is a fixed route, DPU-stickered vehicle, the DPU is notified. DPU typically reviews MART's vehicle and driver records. DPU inspects the vehicle if any person is transported by ambulance, if the vehicle is totaled, or if the accident resulted in the death of any person.

A determination is made with respect to repairing the vehicle in-house or having the vehicle repaired by an outside vendor. If the vehicle inspected has no visible damage and is deemed to be safe to drive, it is returned to service.

When a vehicle returns to MART after repair at an outside vendor, staff photographs and inspects the vehicle before it is returned to service.

The Maintenance Department maintains a log of all accidents that contains the following information:

- Vehicle number
- Driver's name
- Date of loss
- Plate number
- Appraisal (yes or no)
- Repair site
- Claim # and closed or not
- Comments (fault/brief description)
- Picture (checked when done)
- Checks received (check when received)

Minor accidents with no visible damage or damage below the vehicle deductible are not typically reported, and vehicles will be repaired in-house, providing no other vehicles or property were damaged and the accident did not involve a pedestrian.