City of Billings
Aviation and Transit Dept.

MET TRANSIT DIVISION
Public Transit Agency Safety Plan
2025

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TRANSIT AGENCY INFORMATION

Accountable Executive: Rusty Logan - Assistant Transit Director

Chief Safety Officer: Josh Smith - Transit Operations Coordinator

MET Transit regularly utilizes FTA funding from sections 5303, 5310, 5307, and 5339.

The Metropolitan (MET) Transit System is a division of the Aviation and Transit Department within the City of Billings located in Billings, MT. The system provides public transportation service within city limits, which includes both fixed-route bus services and ADA paratransit services (referred to as MET Plus). MET Transit has served the city with fixed-route service since 1973; ADA paratransit services were internalized to city operations in 1997. The City of Billings has the largest population of any city in the state of Montana with approximately 117,000 people and covers a geographic area of over 41 square miles. Roughly two-thirds of the city are located within the Yellowstone River Valley, with the remainder of the city located north of a sandstone cliff formation above the valley; Billings is also a significant rail hub for the region, which presents a number of challenges regarding planning, development and daily operations of routes where rail and motor vehicle traffic interact.

MET Transit utilizes a fleet of twenty-five (25) buses to provide service on fourteen fixed-routes, as well as fifteen (15) body-on-chassis small buses providing service across ten (10) paratransit demand-response routes. These vehicles operate from approximately 5:45 AM to 8:15 PM on weekdays and 8:00 AM to 6:00 PM on Saturdays. Further, MET Transit has three (3) separate property locations with three (3) separate facilities, consisting of the main operations facility and two transfer centers placed strategically in the city. The METroplex, located at 1705 Monad Road, is the main operations facility and consists of a large building combining the administrative offices, bus storage and fueling bays, fleet maintenance bays, and general inventory storage; this facility also has a smaller secondary building that houses the MET Transit bus wash bay and a large yard for both storage and training. All rolling stock, equipment, and parts inventories are housed at the METroplex. The Stewart Park Transfer Center, located at 260 Stewart Park Rd, consists of a large bus parking area with passenger shelters, as well as a small outbuilding which serves as a driver break area. The Downtown Transfer Center, located at 220 N. 25th St, consists of a large parking area with passenger shelters and a facility containing driver break areas, as well as offices for periodic administrative use.

ANNUAL REVIEW & UPDATE PROCESS

The annual review and update of this Public Transit Agency Safety Plan (PTASP) plan will take place at the beginning of each calendar year. Updates will be finalized and in place by the 1st Quarter of each year. The review will be led by the Accountable Executive, with support from the Chief Safety Officer as well as the Transit Training and Compliance Coordinator, Road

Supervisors, and remaining management team, with input from the safety committee. Updates will be administered based on operational needs, updated regulations, safety goals, employee and public feedback, as well as informed by any safety findings or issues that arise throughout the previous year.

PLAN DEVELOPMENT, APPROVAL, UPDATE HISTORY

DRAFTED BY	City of Billings- MET Transit	
SIGNATURE OF ACCOUNTABLE EXECUTIVE	*Rusty Logan* Rusty Logan- Assistant Transit Director	
CITY COUNCIL APPROVAL	Meeting Minutes Attached	
MAYOR SIGNATURE	*William A. Cole* Bill Cole – Mayor	2/27/2025 _____ DATE
VERSION NUMBER AND UPDATES		

VERSION NUMBER	SECTION AFFECTED	REASON FOR CHANGE	DATE ISSUED
0001	All	New Document	December 31, 2020
0002	- Annual Review & Update - Discipline Thresholds - Recognition Page - Safety Risk Register - Safety Assurance Policy - Self Reporting Policy - Self Report Form	Annual Review	January 10, 2022
0003	- Agency Leadership- Road Supervisor - Updated Targets and Information - Infectious Disease - Organizational Structure	Annual Review	January 16, 2023
0004	- Updated Targets and Information	Annual Review	January 2024
0005	- Transit Agency Info Updated - Targets and Information - Key Staff updated with Training Position info	Annual Review	February 2025

	- Safety Recognition Jacket language - Safety Assurance Policy - Organizational Structure - Added new Directive 24-1 Information in Appendices		

SAFETY PERFORMANCE TARGET COORDINATION

MET Transit's Accountable Executive shares our Public Transit Agency Safety Plan, including safety performance targets, with the Metropolitan Planning Organization (MPO) Technical Advisory Committee (TAC). The TAC is comprised of both State of Montana representatives and the Billings-Yellowstone County MPO participants.

Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	State of Montana	01/30/2025
Targets Transmitted to the MPO	City of Billings MPO	Date Targets Transmitted
	Billings-Yellowstone County MPO	01/30/2025

ANNUAL SAFETY PERFORMANCE TARGETS

MET Transit has established safety performance targets based on the safety performance measures established by FTA in the National Public Transportation Safety Plan Final Rule. The safety performance measures are total fatalities, injuries, safety events, and system reliability separated by mode of transit service. Due to increased operator and transit employee assaults, and in response to FTA's General Directive 24-1: Required Actions Regarding Assaults on Transit Workers, MET has added an additional performance target and increased safety mitigations and training in an effort to reduce the number of operator and employee assaults in the future.

Current safety performance targets are identified in the table below and are adjusted as needed in consideration of previous performance results. In 2024, MET recorded three (3) safety events on the fixed route service mode and zero (0) on Paratransit. The three safety events resulted in two (2) injuries and one (1) fatality. MET had fourteen (14) verbal employee assaults and two (2) physical assaults. All but one assault was on transit operators, with the remaining verbal assault being on a Road Supervisor. This was a large increase from 2023, when MET had one verbal assault on an operator. The Federal Transit Administration (FTA) definition of assault and full Safety Management System Report (SMS) can be found in Appendix L.

Updated safety performance targets for 2025 are below:

Safety Performance Targets for 2025:

	Fixed Route Service	Paratransit Service
Fatalities (Total)	0	0
Fatalities (per 100k VRM)	0	0
Injuries (Total)	0	0
Injuries (per 100k VRM)	0	0
Safety Events (Total)	1	0
Safety Events (per 100k VRM)	< 1	< 1
System Reliability (VRM/Failures)	30,000	100,000
Assaults on Operations Staff	0	0

SAFETY MANAGEMENT POLICY

Safety Management Policy Statement

MET Transit is dedicated to maintaining safe operations while providing the people of Billings with a cost-effective and efficient public transportation system. MET has developed the included policies to facilitate a safe working environment for employees, customers, and the general public.

The purpose of this plan is to provide a structured safety management approach that effectively controls operational safety risks and continuously improves MET's safety performance; accomplishing this requires the following actions:

- Document a top-down commitment from management and a commitment from employees, contractors, and the general public to achieve safety goals.
- Establish a chain of control to document the implementation of the PTASP through guidelines, policies, and provisions.
- Identify safety management roles and responsibilities that outline ownership at every level.
- Establish the Agency's safety goals and objectives while ensuring MET is following industry safety practices and federal recommendations.
- Set safety performance targets to ensure MET achieves its safety objectives.
- Define acceptable levels of safety performance for provided services.
- Provide a framework and guidance to implement, evaluate, and continuously improve safety policies, the safety risk management processes, and the achievement of related goals and objectives.
- Establish safety programs that document MET Transit's commitment to safety.
- Maintain SMS records according to reporting year and type of record.   All records will be maintained for a minimum of three (3) years.

This PTASP applies to all MET Transit operations and related activities. All MET facilities fall under the same requirements that equipment, supplies, practices, and procedures, and must meet or exceed applicable federal, state, and local standards, as well as the MET Transit Safety Management Systems (SMS) standards.

Safety Management Policy Communications

Rusty Logan, the Assistant Transit Director and Accountable Executive, informed MET's staff of the implementation of the PTASP plan in August 2020. MET Transit distributes a hard copy of the Safety Management Policy to each employee, as well as posting the policy on MET Transit's website. MET Transit utilizes a safety bulletin board in operations common areas where the policy and all supporting documents are displayed. MET operates an internal safety committee comprised of management, operators, maintenance staff, and administrative personnel to carry out and continually evaluate various aspects of the safety plan. Further, the safety committee

provides a platform for employees to communicate safety concerns and allows management to communicate mitigation updates. All new hires are given a one-on-one introduction to MET's Safety Management Policy.

Authorities, Accountabilities, and Responsibilities
Accountable Executive

The Assistant Transit Director serves as the Agency's Accountable Executive. The Assistant Director's responsibilities for the SMS Plan include:

- Acts as the Division's safety advocate
- Maintains authority for major financial issues
- Directs responsibility for the conduct of the division's affairs
- Has final authority over division operations
- Establishes and promotes safety policy
- Collaborates with Management Staff to establish the division's safety objectives and targets
- Has final responsibility for the resolution of all safety issues

Chief Safety Officer

The Transit Operations Coordinator serve as the Agency's Chief Safety Officer (CSO). The Transit Operations Coordinator:

- Has the oversight authority and responsibility for implementing MET's Safety Management System (SMS).
- Reports directly to the Assistant Transit Director.
- Responsible for providing resources and executive-level safety advocacy and direction to Supervisors and other management staff who manage day-to-day implementation and operation of the SMS.

Agency Leadership

The role of the Supervisors and other management staff is to assist the CSO in maintaining safe operations. The duties of the Supervisors include taking a lead role in:

- Developing/maintaining safety policies, plans, procedures, and processes, along with developing and maintaining a proactive SMS Plan/program.
- Providing advice for developing realistic and data-driven safety performance indicators and targets.
- Providing advice, interpretation, and recommendations over technical matters, such as safety design and systems in new bus purchases, facility renovations, decommissioning of old equipment, and other areas, including, but not limited to, standards for safe working, job hazard analyses, and assisting with the development of Standard

Operating Procedures (SOPs).
- Leading the development of safety training, competency, and awareness programs, and providing advice, input, and final review in the development of training activities.
- Tailor safety management plans for conduct of operations based upon risk.
- Engaging in Risk Management in safety audit activities, verifying compliance with the SMS Plan with relevant guidelines and standards, and performing regular safety related reviews of operations.
- Allocate safety resources based on work, associated hazards and the importance of facilities/operations.
- Provide training and education programs that maintain competence in safety-critical areas.
- Measure and report program effectiveness in a form that is useful and relevant.
- Road supervision and addressing of customer complaints.
- Administration of daily safety messages before operators begin their shift.

Key Staff and Activities

Safety Training and Compliance Coordinator: This position is responsible for providing and/or coordinating all staff training including new employee training, CDL training, ongoing annual safety training, mitigation training, and other identified training.

Transit Road Supervisors: These positions are responsible for direct supervision of fixed-route, paratransit, and dispatch staff as well as coordination of daily operation activities; primary safety audits and reviews of operations staff are completed by these positions.

Transit Maintenance Supervisor: This position is responsible for oversight, direction, and coordination of daily fleet and facility maintenance and operations, inlduing staff supervision; primary safety audits and reviews of maintenance staff are completed by this position.

MET Transit has an internal safety committee and conducts staff meetings to support its SMS and safety programs:
- Staff Meetings: Hazard reports and mitigations will be shared; safety topics will be shared and discussed. Any safety concerns or further information will be documented.
- Safety Committee: The internal safety committee will meet monthly to discuss hazards, mitigations, and any further safety issues that may arise. The safety committee will be used as a vehicle for further employee safety reporting and communication.

Employee Safety Reporting Program

The objective of the Employee Safety Reporting Program is to cultivate and foster a proactive safety culture in which employees are comfortable and encouraged to bring safety concerns to the attention of agency Management. MET recognizes that employees are most familiar with the details of their respective jobs and work environment, which makes their input crucial to maintaining safety in the workplace. Therefore, when witnessing an unsafe act or noticing an unsafe condition, or being involved in a near miss or unsafe act, employees must promptly report the unsafe condition or act to a Supervisor, Chief Safety Officer, or the Assistant Transit Director. The situation shall be evaluated promptly with employees receiving a clear plan for correcting the issue.

No person will be penalized or retaliated against for bringing safety issues to the attention of management. This statement does not apply to information received from a source other than the employee, or which involves an illegal act, deliberate or willful disregard of policy, regulations, or procedures. However, repetitive risk behaviors displayed by an employee may be subject to disciplinary action.

There are several ways employees can report their safety concerns to management:
- Report directly to a Supervisor
- Report directly to the Chief Safety Officer
- Report directly to the Assistant Transit Director
- Submit a safety concern anonymously via the safety suggestion box, located in the employee METroplex break area
- Report minor safety concerns to transit dispatch
- Complete a safety self-report form

All safety concerns and comments are reviewed with follow-up by the direct supervisors in a timely manner.

Examples of information typically reported include:
- Safety concerns in the operating environment (potholes, water main break, etc.)
- Policies and procedures that are not working as intended.
- Information regarding safety events (perhaps lack of radio communication or failure of equipment)

The Chief Safety Officer will review and document all safety items as needed. Forms can be submitted to the safety suggestion box or directly turned into supervisors. All safety reporting forms are as follows:
- All near misses, safety events, or hazards will be reported on the Safety Reporting Form, which can be found in Appendix A.
- Vehicle breakdowns will be logged on a spreadsheet by transit dispatchers daily. The

vehicle breakdown sheet can be found in Appendix B.

- City of Billings Harassment Report Form can be found in Appendix C.
- City of Billings Workplace Violence Report form can be found in Appendix D.
- MET Transit Safety Risk Register can be found in Appendix E.
- City of Billings Incident Report Form can be found in Appendix F.
- Self Reporting/Near Miss Form can be found in Appendix I.

SAFETY RISK MANAGEMENT

Safety Risk Management Process

A Hazard is defined as "a condition with the potential to cause harm." Risk management is a systematic approach to managing workplace hazards. It is essential that management identifies, evaluates, and determines the means to reduce risks to an acceptable level to protect employees, visitors, third-party contractors, and others who are physically present in the workplace. Risk management also protects assets and considers how to avoid losses.

After hazards and their potential impact have been identified, MET Management will conduct a Safety Risk Assessment to determine the seriousness of the risk. Factors considered include the likelihood of occurrence, the severity of the consequences should there be an occurrence and the level of exposure to the hazard.

The evaluation consists of:
- Existing controls – Existing processes, devices, practices, or controls that act to minimize threats or enhance opportunities, including an indication of how they might be of influence.
- Consequence – A description and rating of the consequence of a risk, in terms of the loss or gain that may be experienced if the event occurs.
- Likelihood – A description and rating of the likelihood of the risk for the full range of event consequences (for opportunities, it is the likelihood of the stated gain being realized if the opportunity is pursued).

MET Transit supervisory staff will assess safety risks utilizing the Safety Risk Matrix. Results of the risk evaluation process will help prioritize the risk and determine whether it is being appropriately managed or controlled. If the risks are acceptable, the hazard will need further monitoring. If the risks are unacceptable, MET will take necessary steps to lower the risk to an acceptable or tolerable level, or to remove or avoid the hazard.

When contractors work on transit property, it is expected that they will wear necessary personal protective equipment and follow all safety protocols put in place by MET. This is essential for the safety of passengers, transit employees, contractors, and protection of transit property. MET Transit has a duty to inform contractors when knowledge of hazards exists. Any unsafe act observed by the contracting agency must be addressed, up to and including, work stoppage. All unsafe contractor behaviors will be recorded on MET's Safety Reporting Form, which can be found in Appendix A.

Safety Hazard Identification

Hazard identification and hazard analysis are tools to identify and address hazards before they escalate into incidents or accidents. At MET Transit, hazards are identified through the following activities:

- Employee safety reporting
- Customer service reporting
- Observations of operations
- Safety inspections
- Incident reporting and investigation
- Incident, injuries, and accident history
- Items discussed at the MET Transit Staff Meetings
- Legislation and industry standards
- Data trending reports made available through incident, injury and accident history, insurance carriers and pools, and local authorities
- Review and audit of safety policies and procedures, and safety instructions for equipment and materials
- Random camera footage review, ride-alongs with operators, or direct field observation performed by a supervisor

When hazards are identified, they are addressed by:

- Immediate resolution
- Reporting to a higher level within the organization
- Reporting the hazard to the representative Supervisor
- Inputting the risk into the Safety Risk Register, which can be found in Appendix G, so that all mitigations are available for employee viewing
- Utilizing MET's lock-out tag-out policy when deemed necessary

Safety Risk Assessment

All identified and system-accepted hazards, near-miss situations, and safety events that occur shall be assessed. Safety risk assessment will be conducted for the "as reported" hazardous condition and again conducted for the "mitigated" condition. Additionally, system-wide annual risk assessments will be conducted. The risk assessment and risk control process shall be reviewed and revised:

- As a part of MET Transit's safety meetings
- As applicable due to new or revised activities or procedures
- Annually by management

A safety risk assessment has two elements: hazard severity and hazard probability. Hazard severity is a qualitative determination of the worst likely case that could be anticipated because of human error, poor design, failure or malfunction of component(s). Hazard

severity ratings are as follows:

- Catastrophic – Operating conditions are such that human error, poor design, failure, or malfunction of components may commonly cause multiple deaths, numerous casualties or major system loss. Catastrophic hazards require the immediate cessation of unsafe activity or operation.
- Significant – Operating conditions are such that human error, poor design, failure, or malfunction of components may commonly cause death, limited casualties or significant system loss that will require immediate termination of the unsafe activity or operation.
- Moderate – Operating conditions are such that human error, environment, poor design, failure or malfunction of components or procedural deficiencies may commonly cause severe injury, or major subsystem damage requiring immediate corrective action.
- Low – Operating conditions are such that they commonly cause minor injury, minor occupational illness, or minor system damage. Human error or component failures can be controlled or counteracted.
- Negligible – Operating conditions are such that human error, poor design, failure or malfunction of components may commonly cause no, or less than minor injury, occupational illness, or system damage. Hazard probability is a subjective measure of the likelihood that a specific hazard will occur during the useful life of the asset.

Hazard probability is categorized as follows:

- Frequent – Likely to occur frequently
- Probable – Likely to occur several times
- Occasional – Likely to occur sometimes
- Remote – Unlikely but possible to occur
- Improbable – So unlikely that it can be rejected from consideration

Hazard severity and probability can be considered using a Risk Assessment Matrix. A Risk Assessment Matrix helps to assess the level of risk (risk rating) for each identified hazard and subsequent control measures to apply through hazard resolution or mitigation, to rank the prioritization of limited resources in the event that more hazards are identified than budget allocation allows for the implementation of hazard elimination or mitigation measures.

RISK RATING = LIKELIHOOD x SEVERITY

S E V E R I T Y			1	2	3	4	5
	Catastrophic	5	5	10	15	20	25
	Significant	4	4	8	12	16	20
	Moderate	3	3	6	9	12	15
	Low	2	2	4	6	8	10
	Negligible	1	1	2	3	4	5
			1 Improbable	2 Remote	3 Occasional	4 Probable	5 Frequent
					LIKELIHOOD		

Catastrophic	STOP
Unacceptable	URGENT ACTION
Undesirable	ACTION
Acceptable	MONITOR
Desirable	NO ACTION

Safety Risk Mitigation

If a risk is deemed unacceptable, risk controls are developed that will either eliminate the risk or mitigate the risk to an acceptable level. After mitigations are developed, the Chief Safety Officer will reassess the new controls to ensure they do not produce an alternative risk. A second assessment of the new control will be conducted following the same procedure. Once satisfied that residual risk has been mitigated to an acceptable level, the new process/solution will be implemented and documented.

Many different means are employed to resolve identified hazards. These include, but are not limited to design changes, the installation of controls and warning devices, and the implementation of special procedures. The methods for resolving hazards are as follows:

- *Design for Minimum Risk* – From the initial design, eliminate hazards through design selection.
- *Safety Devices* - Hazards that cannot be eliminated or controlled through design selection shall be controlled using fixed, automatic, or other protective safety design features or devices. MET will perform periodic checks of safety devices.
- *Warning Devices* - When neither design nor safety devices can effectively eliminate or control an identified hazard, devices may be used to detect and generate an adequate warning signal to correct the hazard or evacuate employees. Warning signals shall be designed to minimize the probability of employees responding incorrectly to signals and shall be standardized within similar systems.
- *Procedures and Instruction* - Where it is impossible to eliminate or adequately control a hazard through design selection, engineering or use of safety and warning devices, the agency will use procedures and training to control the hazard. Procedures may include the use of personal protective equipment. Precautionary notations shall be standardized as specified by management; safety critical tasks and activities may require employees to be certified.

Other sources of information:

- *Risk Management or Safety Guidelines* – Provide requirements across MET Transit based on policy, legislation or regulation (e.g., Operator's Manual City of Billings Human Resources Employee Manual, etc).
- *Safe Work Instructions* – MET Transit-specific procedures and instructions developed and used by management to manage health and safety and implement the SMS within the team.

When to use Safety Risk Mitigation:

- *Daily Operational Systems Assessment* - Methods that provide real-time feedback of safety compliance, adherence to established safety norms, or identified job hazards.
- *Design* – Steps taken to ensure safety requirements are considered in the planning, operation, and disposal of all items including shops, facilities, and equipment.
- Performance of asset condition assessments and SMS hazard analysis to ensure compliance with State of Good Repair standards.

Safety Risk Matrix Discipline Thresholds

- *Score of 15 or Above: Stop or Urgent Action* - Any risk that has been given a score of 15 or higher will result in corrective action. Per the Risk Matrix these scores would require urgent action or cessation of action.
  Score of 12 or below: Action - Risks that have been given a score of 14 or below may result in corrective action. MET Transit's goal is to provide training and guidance to prevent incidents and risky behavior. Risks given a score of 14 below will be addressed with additional training and coaching letters; however, operators that are found to have repetitive risk behavior may be subject to disciplinary action.

SAFETY ASSURANCE

The purpose of Safety Assurance is to evaluate the overall effectiveness of safety risk controls established under Safety Risk Management and MET Transit PTASP. MET Transit is responsible for monitoring and evaluating the operations system to ensure that:

1) Emerging risks are identified
2) MET is in compliance with regulatory requirements applicable to the SMS plan, and
3) The organization meets or exceeds its safety objectives through the collection, analysis and assessment of data regarding the organization's performance.

MET Transit's safety assurance activities for supporting oversight and performance evaluation includes, but is not limited to:

- Safety Meetings
- Monthly Safety Committee Meetings
- Safety Inspections
- Risk Assessment
- Internal Audits
- Employee Reporting
- Regular review of onboard and facility camera footage to assess employees and specific incidents
- Regular in field and on the job observation of employees
- Regular vehicle inspections and preventative maintenance
- Annual employee evaluations
- Regular mitigation review to determine identified mitigations that may be ineffective, inappropriate, or not implemented as they were intended.

MET's Chief Safety Officer and supervisory team will document all activities listed above. Upon review, the MET team will make appropriate changes to safety practices to ensure that all mitigations are deemed effective.

Safety Event Investigation

Documented procedures are maintained for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event.

The Chief Safety Officer maintains all documentation of investigation policies, processes, forms, checklists, activities, and results. Safety event investigations are chaired by the Chief Safety Officer and will include Supervisors and the Accountable Executive. The following determinations will need to be made:

- The accident was preventable or non-preventable;
- Personnel require discipline;
- Personnel require retraining;
- The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event; and
- The accident appears to involve underlying organizational causal factors beyond just individual employee behavior

Employees violating mitigations and policies to prevent catastrophic and unacceptable risks will result in disciplinary action, while undesirable and lower risks will require further investigation on a case by case basis. All risk violations will be addressed directly with an employee by a Supervisor. Refresher training will be provided to the identified employee as appropriate.

Monitoring of Safety Reporting

MET Transit's Chief Safety Officer and Safety Committee 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 or Safety Committee may make recommendations to ensure concerns are investigated through the Safety Risk Management Process.

The Chief Safety Officer and Safety Committee also review internal and external audits to ensure compliance with all MET Transit safety regulations.

SAFETY PROMOTION

Training

The comprehensive safety training program applies to all employees directly responsible for safety, including:

- Transit Operators,
- Dispatchers,
- Mechanics and Fleet/Facility Techs,
- Road Supervisors
- Training and Compliance Coordinator
- Chief Safety Officer
- Accountable Executive.

Resources are dedicated to conducting a comprehensive safety training program, as well as training on SMS roles and responsibilities. The scope of the safety training, including annual refresher training, is appropriate to each employee's individual safety-related job responsibilities and their role in the SMS.

Operations safety-related skill training includes the following:

- New-hire transit operator classroom, skills course, and on-the-job training,
- Classroom, skills course, and on-the job Transit Operator refresher training
- Classroom and on-the-job training for dispatchers
- Classroom and on-the-job training for Road Supervisors
- Classroom and on-the-job training for Transit Management
- Accident investigation training for the Chief Safety Officer and Road Supervisors

Vehicle and facility maintenance safety-related skill training includes the following:

- Ongoing maintenance technician skill training,
- Ongoing skill training for maintenance Supervisor,
- Ongoing hazardous material training for maintenance staff, and
- Training provided by vendors.

The Accountable Executive, Chief Safety Officer, and Supervisors must complete FTA'S SMS Awareness online training.

Safety Communication

The Chief Safety Officer and Supervisors coordinate safety communication activities for the SMS. Activities focus on the three categories of communication activity established in 49 CFR Part 673 (Part 673):

- Communicating safety and safety performance information throughout the agency: Information is communicated on safety and safety performance through the MET Transit Safety Bulletin Board and with a permanent agenda item in all Drivers' Meetings dedicated to safety. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact service or safety performance, and updates regarding SMS implementation, policy, and procedures. Requests for information from drivers during these meetings are also recorded in meeting minutes.

- Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency: As part of new-hire training, safety policies and procedures are distributed, included in the Employee Handbook, to all employees. Training is provided on these policies and procedures and discussed during safety talks between Supervisors and bus operators and vehicle technicians. For newly emerging issues or safety events at MET, the Chief Safety Officer issues bulletins or messages to employees that are reinforced by Supervisors in one-on-one or group discussions with employees.

- Informing employees of safety actions taken in response to reports submitted through the Employee Safety Reporting Program: Targeted communication to inform employees of safety actions taken in response to reports submitted through the Employee Safety Reporting Program is provided, including handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors.

Safety Recognition

MET Transit recognizes employees that exemplify workplace safety.

Annually
- On their anniversary date, each transit operator will be eligible to receive a pin and certificate recognizing their dedication to driving safely. Pins will be awarded during each employee's annual evaluation.
- To receive an annual safe driving award, an employee must be in good safety standing.
- During the annual evaluation, a supervisor will review supervisor notes, corrective actions, and any other information in an employee's personnel file to determine eligibility.

Milestone Years
- Beginning at 5 years of service, a transit operator will be eligible to receive a MET Transit Safe Driving jacket with years of safe service embroidered as long as the

employee has consistently received annual awards for safe driving.

- Jackets will be distributed on employee anniversaries in increments of 5 years.
- MET Transit will be responsible for the initial cost of each jacket award at milestone years; however, if during the subsequent 5 year period the coat needs replaced, the employee can utilize their uniform allotment for replacement.

At initiation of the jacket program, MET Transit retroactively reviewed personnel files and awarded jackets in accordance with this policy.

COMMONLY USED ACRONYMS

Acronym	Word or Phase
PTASP	Public Transit Agency Safety Plan
CSO	Chief Safety Officer
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
SMS	Safety Management System
SRM	Safety Risk Management

APPENDIX A – NEAR MISS/ HAZARD IDENTIFICATION FORM

City of Billings MET Transit

Near Miss/Hazard Identification Report

A. Near Miss/ Hazard Description (Complete all that apply)		
☐ **Near Miss**		☐ **Workplace Hazard**
Date:	**Employee:**	**Reported to Supervisor:**
Time:	**Location and Unit Number:**	**Date:**
		Time:

Describe the near miss/ hazard: (Provide any contributing events and circumstances; work activity; procedures or work instructions that may apply. Attach worksheets, drawings, photographs for clarification, if applicable.)
Root Cause(s)/Contributing Factor(s):
Mitigation Action Taken (If necessary):
Immediate:
Long Term:

Potential Release (gas, liquid, solid)	Estimated Amount	Unit of Measure

B. Environmental (Check or complete all that apply)

C. Mitigation Action Complete	
Supervisor Signature:	Date:
Employee Signature:	Date:

D. Corrective Action (If applicable)

☐ Oral Warning   ☐ Written Warning

Employee Signature:	Date:
Supervisor Signature:	Date:

APPENDIX B – BREAKDOWN LOG

MET BREAKDOWN LOG

UNIT	ROUTE	DATE	BREAKDOWN TIME	REPLACEMENT TIME	DOWN TIME	NOTES
1823	3	########	10:19	10:32	0:13	Grinding noise in front, replaced with 1820
					0:00	
					0:00	
					0:00	
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APPENDIX C – HARRASMENT REPORT FORM

CITY OF BILLINGS HARASSMENT REPORT
(Submit to Human Resources)

Name: Job Title: _____ Department/Divison: _____ Supervisor: _____

STATEMENT:

Name(s) of Witnesses:

_____

_____

Description of Incident: (Describe in your own words the actions of all involved - attach additional pages if necessary)

_____

_____

_____

_____

_____

I understand that Human Resources will conduct an investigation of my report.
A report of harassment, its investigation, the outcome of the investigation and any action taken relating to a specific employee is confidential. Dissemination of confidential information shall be limited to persons with a need to know in order to conduct an investigation and take appropriate corrective action.

I hereby authorize dissemination of information regarding this report to other persons with a need to know.

I acknowledge that I have read and understand the above statements and certify that all information I have provided is true to the best of my knowledge.

Employee Signature:_____Date:_____Time:_____
Submitted to:_____Date:_____Time: _____

March 2004

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APPENDIX D – WORKPLACE VIOLENCE REPORT FORM

CITY OF BILLINGS REPORT OF WORKPLACE VIOLENCE
(Submit to Human Resources)

Name:_____Job Title: _____

Department/Divsion:_____Supervisor: _____

STATEMENT:

Name(s) of Witnesses:

_____
_____
_____

Description of Incident: (Describe in your own words the actions of all involved - attach additional pages if necessary)

_____
_____
_____
_____
_____
_____

I understand that Human Resources will conduct an investigation of my report.
A report of workplace violence, its investigation, the outcome of the investigation and any action taken relating to a specific employee is confidential.

Dissemination of confidential information shall be limited to persons with a need to know in order to conduct an investigation and take appropriate corrective action.

I hereby authorize dissemination of information regarding this report to other persons with a need to know.

I acknowledge that I have read and understand the above statements and certify that all information I have provided is true to the best of my knowledge.

Employee Signature:_____Date:_____Time:_____
Submitted to:_____Date:_____Time: _____ __

March 2004

APPENDIX E – SAFETY RISK REGISTER

SAFETY RISK REGISTER

Risk ID #	Risk Identification/ Description/Date	Risk Evaluation (1 to 25)	Risk Impact Time Horizon (short term or long term/phase)	Risk Control (Internal or external)	Area of Impact (time, cost, quality, other projects)	Response Strategy (Eliminate, reduce likelihood, reduce impact, accept, transfer)	Assigned Staff Member to Handle Risk	Risk Evaluation After Mitigation	Date Completed
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									

APPENDIX F – CITY ACCIDENT/INJURY REPORT

CITY of BILLINGS ACCIDENT/INJURY FORM

(Revised May '07)

REPORT OF:
(Check all that apply)
- ☐ Employee on-the-job injury*
- ☐ Occupational illness*
- ☐ Damage to City property
- ☒ Damage to citizen's property or person

THIS FORM MUST BE COMPLETED AND SUBMITTED TO THE SAFETY OFFICER. EMAIL TO yergerj@ci.billings.mt.us or FAX TO 657-8390, or SEND VIA COURIER. A DRAFT COPY IS REQUESTED AS SOON AS POSSIBLE, EVEN IF/WHILE YOU ARE ATTEMPTING TO ROUTE FOR REVIEW AND SIGNATURES.

EMPLOYEE

Employee:_____ Dept & Position:_____ Work Phone: _____

Supervisor:_____ Supervisor Phone: _____

INCIDENT

Date & Time of Incident:_____ Address/Location of Incident: _____

Describe what occurred: _____

Investigating Police Officer:_____ Report No.: _____

CDL Holders: Was employee drug/alcohol tested? ☐ Yes ☐ No If no, why not _____
(Employee must be immediately tested if any of the following occurs: 1) Fatality; 2) Medical Treatment away from scene & City driver cited; 3) Disabling damage to any vehicle & City driver cited).

EMPLOYEE INJURY

Type of Injury and Part(s) of Body * _____
    (*Be specific. e.g., sprained R ankle, bruised L wrist, etc.)

Did or will the employee seek medical treatment? ☐ Yes ☐ No Name of Dr./Hospital: _____

Type of medical treatment: _____
    (Must submit doctor's statement/restrictions/release)

Did a doctor remove the employee from work? ☐ Yes ☐ No Date(s) of absence:_____

Did a doctor impose restrictions or limitations due to this injury? Yes No ☐

If yes, explain: _____

{This is my claims for workers' compensation benefits due to an on-the-job injury, occupational disease or death of the above named worker . I understand that signing this claim for compensation authorizes the release of rehabilitation records, Social Security records and health care information (medical records) relevant to this claim to the workers' compensation insurer and insurer's agents. I also understand that if I obtain or exert unauthorized control over workers' compensation benefits, I may be fined and/or imprisoned.}

CITY VEHICLE AND/OR OTHER CITY PROPERTY

Description of Property _____

Vehicle Year, Make & Model_____ Vehicle No.: _____

Description of Damage (Attach/Enclose photos): _____

CITIZEN/OTHER PARTY INFORMATION

Name: _____ Address: _____ Phone(s): _____

City/ST/Zip_____ Phone(s): _____

Driver Name (if different than above): _____ Phone(s): _____

Owner Name (if different than above): _____ Phone(s): _____

Description of Damage (Attach/Enclose photos): _____

Vehicle Year/Make/Model: _____ License Plate No.: _____ VIN: _____

Insurance Company: _____ Policy No: _____

Agent: _____ Agent Phone: _____

Citizen injuries and treatment: _____

Doctor or Hospital: _____

WITNESSES: (Attach signed witness statements as appropriate)

Witness Name: _____ Phone: _____ Address: _____

Witness Name: _____ Phone: _____ Address: _____

Witness Name: _____ Phone: _____ Address: _____

SUPERVISOR'S SECTION

Date/time employee reported incident to you: _____
Based on your investigation, what was the cause of this accident?

UNSAFE ACT
- ☐ FAILURE TO FOLLOW RULES
- ☐ IMPROPER PROCEDURE
- ☐ HASTE
- ☐ FAILURE TO OBTAIN HELP
- ☐ IMPROPER USE OF TOOLS/ EQUIPMENT
- ☐ INATTENTION OR DISTRACTION
- ☐ FAILURE TO USE PPE

UNSAFE CONDITION
- ☐ UNSAFE LAYOUT
- ☐ UNSAFE EQUIPMENT/FACILITIES
- ☐ INSUFFICIENT EMPLOYEE TRAINING
- ☐ ACTION OF ANOTHER PERSON
- ☐ PERSONAL PHYSICAL CONDITION
- ☐ OTHER (EXPLAIN)_____

Supervisor's comments – Including what specific corrective actions have been/will be implemented to prevent

similar injuries? _____

SIGNATURES: (Please print and sign form before submitting to HR)

Employee: _____ Date: _____

Supervisor: _____ Date: _____

APPENDIX G – SAFETY ASSURANCE POLICY

Purpose: The purpose of this policy is to provide the framework for a Safety Assurance program to ensure the delivery of quality public transportation for the citizens of Billings.

Policy: It is the policy of MET Transit to execute a Quality Assurance program using random reviews of camera footage, ride-a-longs, and ride checks quarterly. All Transit Operators will participate.

Definitions:
- **Route tour:** A supervisor will follow an operator in a service vehicle while the operator is on a route for up to 20 minutes and may include spot checks.
- **Ride-a-longs:** A supervisor will ride with an operator while in service for up to 30 minutes or for the duration of a scheduled route run.
- **Camera footage reviews:** A supervisor will review camera footage for up to 20 minutes.
- **Meets Expectations:** Performance consistently meets job requirements. Achieves performance objectives as stated.
- **Needs Improvement:** Performance in one or more skills is less than expected and needs improvement. Direction, supervision, and learning are required if performance objectives are to be achieved.

Procedure: Supervisors will review route video footage, route tour an operator, or ride-a-long with up to 25 percent of the operators quarterly. Driver selection and review type will be random. New operators will be subject to 30, 60, 90, 120, and 240 day reviews. Supervisors will be looking for but not limited to the following:
- Problem-solving/decision-making
- Performance in non-stress conditions
- Performance in stress conditions
- Rules of the road
- Driving proficiency
- Interactions with others
- ADA compliance
- Safety risks
- Other daily operations skills including speed checks

Each review will be handled individually with the operator meeting with members of the supervisory team as soon as possible.

Any witnessed violation will be handled on a case-by-case basis.
a.   The evaluator will consider the risk of the violation.
b.   The evaluator will identify if the violation could be handled with coaching or training.
c.   The evaluator will use corrective action when the violation is 15 or above in the risk matrix. (See page 10 of the PTASP for the matrix.)
d.   The evaluator may use corrective action for repeat offenses.
Examples: The operator did not check a crosswalk for pedestrians and nearly hits a pedestrian while driving across the crosswalk at excessive speeds. The result of this violation would most likely result in corrective action.

MET TRANSIT SAFETY ASSURANCE REVIEW FORM				
Employee Name:		**Review Type:** Circle or highlight all that apply.		
Employee Job Title:		Camera Review	Ride Along	Follow
Supervisor Name:		30 Day	60 Day	90 Day
Date:		120 Day	240 Day	Random Quarterly
		Remedial Training	Other:	
SAFETY ELEMENT	**COMMENTS**	**Need Improvement**	**Meet Requirement**	**NA**
Public Interactions				
Left Turns				
Right Turns				
Stopping				
Reversing				
Accelerating				
Blinker/Hazard Use				
Railroad Crossing				
Intersection Safety				
Service Stop				
Radio Etiquette				
Parking Lot Safety				
2 Hands on the wheel				
Crosswalks				
Checking Mirrors				
Lift/Ramp Use (Safety and ADA)				
Mobility Device Securement				
On-the-Spot Accomodations				
Stop Announcements				
Priority Seating Provision				
Defensive Driving				
Pre/Post Trip				

Comments or Hazards Identified:

SPEED CHECK	LOCATION	Time	Posted	Actual
Check 1				
Check 2				
Check 3				

	Employee Signature:	
	Supervisor Signature:	
	Transit Manager Signature:	

APPENDIX H – SELF REPORTING AND NEAR MISS POLICY

PURPOSE: The purpose of this policy is to cultivate and foster a proactive safety culture in which employees are comfortable and encouraged to bring safety concerns and reports of close calls to the attention of MET Management. MET recognizes that employees are most familiar with the details of their respective jobs and work environment, which makes their input crucial to maintaining safety in the workplace.

POLICY: When witnessing an unsafe act, noticing an unsafe condition or near miss, or being involved in a near miss, employees must promptly report the unsafe condition or act to a Transit Supervisor, Chief Safety Officer, or Transit Manager.

No person will be penalized or retaliated against for bringing safety issues to the attention of management, including their involvement in near miss incidents. This statement does not apply to information received from a source other than the employee, or which involves an illegal act, or a deliberate or willful disregard of policy, regulations, or procedures. Repetitive risk behaviors displayed by an employee may also be subject to disciplinary action.

A near miss is defined as a safety event in which no property was damaged, and no personal injury was sustained, but given a slight shift in time or position, damage or injury easily could have occurred. There are several ways employees can report their safety concerns to management:
- Any safety concern may be reported directly to a Supervisor or the Chief Safety Officer
- **Near misses** must be directly reported to a Supervisor or the Chief Safety Officer.
- Minor safety concerns, not including near misses, may be reported to Transit Dispatch.
- Safety concerns, not including near misses, may be reported anonymously via the safety suggestion box, located in the employee METroplex break area.

All safety concerns and comments are reviewed with follow-up by the direct supervisors in a timely manner.

Examples of information typically reported include, but is not limited to:
- Safety concerns in the operating environment.
- Policies and procedures that are not working as intended.
- Information regarding safety events.
- Near misses.

APPENDIX I – SELF REPORT FORM

SELF REPORTING/NEAR MISS FORM

REPORTING EMPLOYEE (REQUIRED)	
DATE/TIME	
LOCATION/VEHICLE:	

EVENT DESCRIPTION:

MITIGATION SUGGESTION:

APPENDIX J – INFECTIOUS DISEASE CLEANING PROTOCOL

1. Program Scope
    a. MET Transit's Infectious Disease Cleaning Protocol focuses on the maintenance, cleaning, and disinfecting of transit vehicles and facilities during a pandemic. The protocol was developed in response to COVID – 19 but will be utilized for any future viral outbreaks.
2. Program Schedule
    a. The Centers for Disease Control and Prevention (CDC) has developed procedures for cleaning and disinfecting facilities and vehicles, which includes recommendations on minimum requirements for the frequency of cleaning activities. These are summarized on the table below.

ACTIVITY	FREQUENCY
Facility and vehicle routine cleaning	Daily
Partial facility and vehicle cleaning areas i.e.- time clock, door handles)	During shift changes
Deep facility and vehicle cleaning (all surfaces cleaned)	Weekly
HVAC filter change	Monthly or by manufacturer's recommendation
Full facility and pesticide vehicle disinfecting	Daily

3. Cleaning Products
    a. In addition to the CDC-recommended use of soap and water, MET Transit utilizes disinfectant chemicals for surface cleaning. The disinfectant dispensers are on the columns in the fixed route bays. Each disinfectant station dispenses chemicals for mopping and spray bottle applications. MET Transit also provides foggers cleaning vehicle interiors and surfaces in office areas. SDS sheets for all cleaning chemicals are in the City of Billings database.
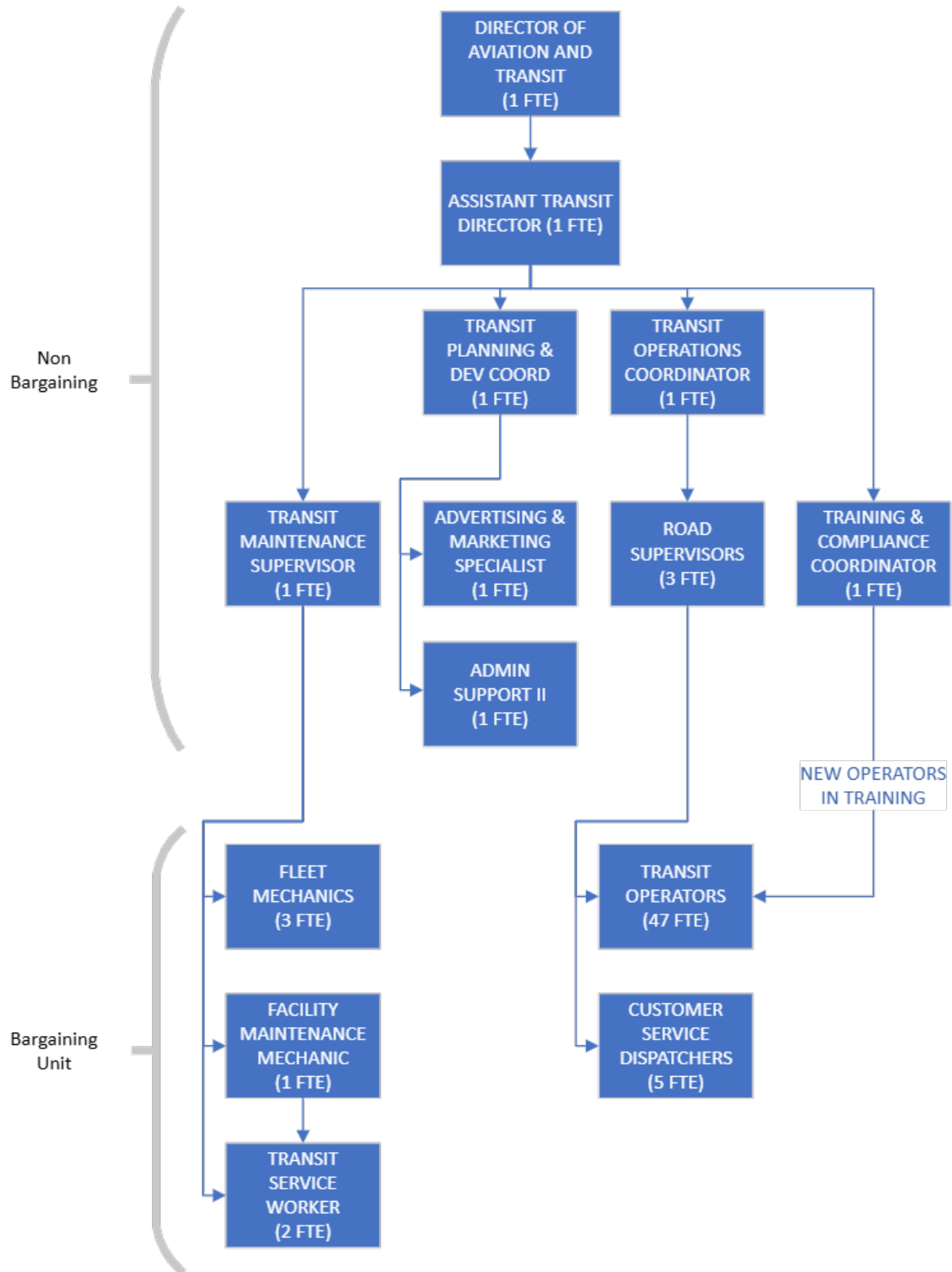4. Personal Protective Equipment
    a. MET Transit provides all employees with masks, disposable gloves, and eye protection for use while completing all cleaning activities.
5. Records & Quality Assurance
    a. MET Transit's supervisory team will perform quality assurance checks daily to ensure that the facility and vehicles are being cleaned properly.
    b. Cleaning logs for MET Transit vehicles and facilities are kept, ensuring that all areas are being cleaned according to the timeline listed on the above table. If a vehicle has been out of service for repair, it will be thoroughly cleaned before being put back into service.

APPENDIX K – ORGANIZATIONAL STRUCTURE

APPENDIX L – FTA ASSAULT DEFINITION & SMS REPORT

From The 2024 National Transit Database Safety and Security Policy Manual, "an assault on a transit worker is a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker."

FTA's assault definition requires either "intent to endanger the safety of any individual" or "reckless disregard for the safety of human life."

Transit Worker Assault Detail Type selections:

  • Physical: An assault in which the attack involved physical contact with the transit worker. This could include any physical contact with the victim from the attacker's body, a weapon, a projectile or other item (e.g., spitting).
  • Non-Physical: An assault in which the attack involves no physical contact with the transit worker. This could include threats, intimidation, or interference that do not result in any physical contact with the transit worker.

Transit Worker Type selections:

  • Operator: An individual who is compensated by the transit agency and whose function is to operate the transit vehicle.
  • Other Transit Worker (e.g., transit police, station agent, etc.): An individual who is compensated by the transit agency or who is otherwise providing specific services on behalf of a transit agency.

The following information was included in the Safety Management System Report and submitted by MET Transit on December 23, 2024, as required in response to General Directive 24-1: Required Actions Regarding Assaults on Transit Workers.

Hazard Assessed: Transit workers must interact with passengers, patrons, and the public, and, at times, must clarify or enforce agency policies. Unfortunately, consequences can occur leading to transit workers being assaulted on transit vehicles and at revenue facilities. The following mitigation measures have been identified with descriptions, likelihood, severity ratings, start and projected completion dates, and effectiveness.

Safety Mitigations Identified by MET:

1. **Signage Informing Riders of Surveillance/Penalties**
   - *Description*: Bus infotainment system displays internal video feed. Decals have been installed in every fixed route vehicle explaining that each bus is equipped with both video and audio surveillance equipment.

     Signage informing riders of penalties – PLANNED: Currently, no State or Local laws exist explicitly laying out penalties for transit worker assaults. MET Transit leadership and the Montana Transit Association has proposed to state lawmakers legislation enforcing harsher penalties for assaults on transit workers, with interest from other transit systems in the state. State lawmakers have agreed to create a proposal. MET will install decals/signage with updated penalties upon adoption of law. Regardless of the outcome of the proposal, MET is developing internal signage for implementation in 2025 regarding transit specific penalties and references to general assault and public disturbance laws.

Riskrating Likelihood:	Moderate
Riskrating Severity:	Moderate
Consequence Likelihood:	Moderate
Consequence Severity:	Moderate

   - *Effectiveness:* Not yet determined. The riding public appears to be generally aware that they are on camera when in a vehicle based on interactions; with some interactions, this limits escalation of the individual while other individuals may continue regardless of video recording. Regarding the proposed legislation, this will be an ongoing effort throughout 2025 in order to develop the law and advocate for its passage. Determining effectiveness will be a multi-year endeavor, comparing available assault data with trends in reductions if implemented. MET Transit will assess general signage after implementation; MET Transit will assess frequency of occurrences of operator assault prior to and after implementation.

2. **De-Escalation Training**
   - *Description*: Currently every new hire completes the required TAPTCO training videos including Hazard Identification & Mitigation, Employee Safety Reporting Program, and Conflict and Aggression Management. Our employees also receive Passenger Assistance, Safety and Sensitivity (PASS) training and recertification. The training team will work to add additional de-escalation training for both new and ongoing employees, including hands-on situation management and role-playing.

Riskrating Likelihood:	Moderate

Riskrating Severity:	Moderate
Consequence Likelihood:	Moderate
Consequence Severity:	Moderate

- *Effectiveness:* Effective. Generally, existing de-escalation (conflict and aggression management appears to be effective) as operators tend to react in a neutral and de-escalating manner when presented with issues while in service; additional training will assist in reinforcing this behavior.

3. **Operating Policies and Procedures**
   - *Description*: MET Transit prints and distributes operating policies and procedures for each employee. These policies and procedures are reviewed in a classroom setting with new hires and during re-training of existing workforce. Policy reminders are regularly published in monthly newsletters. (e.g., only request fare payment once: "In the event of a non-paying passenger, the operator is to inform the passenger of the required fare amount and avoid confrontation. The operator may state to the passenger a fare is required, and the individual cannot ride without paying a fare or showing a pass…If the passenger refuses to leave, notify a supervisor but do not attempt to forcibly remove a passenger").

Riskrating Likelihood:	Moderate
Riskrating Severity:	Moderate
Consequence Likelihood:	Moderate
Consequence Severity:	Moderate

- *Effectiveness:* Effective. Operating policies are in a continual state of update depending on needs and identified issues. A significant update occurred in 2019 outlining a significant amount of operational and behavioral policy changes including avoiding fare disputes (as indicated above), professionalism, conflicts, and ridership policies. Policies for operators appear to be effective in assisting personnel in managing conflicts and issues by providing guidelines for behavior and what issues they should focus on; passenger policies provide operators with something to reference when dealing with problem passengers.

4. **Video/Audio Surveillance**
   - *Description*: All vehicles (fixed route, paratransit, support) are equipped with video and audio surveillance equipment.

Riskrating Likelihood:	Moderate

Riskrating Severity:	**Moderate**
Consequence Likelihood:	**Moderate**
Consequence Severity:	**Moderate**

- *Effectiveness:* Effective. Video recording on buses has been in use since 2010; long term use has appeared to be effective in reducing repeat instances from problem riders once the rider was made aware of video recording being utilized to substantiate transit operator claims of issues. Facility cameras are in the process of being updated at all MET properties (primary facility and both transfer center locations).

5. **Covert/Overt Emergency Alarms**
   - *Description*: Fixed route vehicles are currently equipped with a push-style button integrated into software for the onboard signage that silently alerts the public by displaying an emergency message on exterior signage; all vehicles also have an emergency button on each radio that directly alerts the City/County Emergency dispatch of an onboard emergency.

Riskrating Likelihood:	**Moderate**
Riskrating Severity:	**Moderate**
Consequence Likelihood:	**Moderate**
Consequence Severity:	**Moderate**

   - *Effectiveness:* Effective. All vehicles purchased since 2005 have had emergency radio capabilities; all fixed route vehicles and all paratransit vehicles with destination signs have also had covert message abilities to display to the public. MET has directly experienced members of the public reporting emergency messaging on fixed-route buses as well as calls from dispatch reporting emergency radio button use. MET is not aware of any instances when MET personnel were not notified of the usage of either system.

6. **Automatic Vehicle Location**
   - *Description*: All vehicles (fixed route, paratransit, support) are equipped with AVL equipment. AVL technology allows MET personnel to direct local law enforcement to bus location; AVL also assists passengers in being aware of vehicle location.

Riskrating Likelihood:	**Moderate**
Riskrating Severity:	**Moderate**
Consequence Likelihood:	**Moderate**
Consequence Severity:	**Moderate**

- *Effectiveness:* Effective. AVL has been utilized on paratransit vehicles since the late 2000s; fixed-route buses have been in use since 2018. AVL has proven effective in quick response for law enforcement and emergency personnel should the need arise to dispatch to the vehicle location. More recently (Oct 2024), full automated audio/visual stop annunciation was added to all fixed route vehicles for all stops to not only increase passenger usability but also reduce the potential for conflict arising from passengers missing their correct alighting location. Effectiveness of this will be assessed by measuring prior conflicts arising from missed stops in comparison to missed stop issues after implementation.

7. **Patrol Strategies**
   - *Description*: Local police (Billings Police Department) increased the occurrence of patrols through transfer center locations to help mitigate the instances of loitering, vandalism, and general issues; further, in 2022, MET Transit contracted with Sundown Security to increase overnight patrols through transfer centers. In May 2022, MET Transit added specific Road Supervisor positions in support of PTASP goals (training, mitigation, safety assurance, hazard identification) and direct personnel support. Road Supervisors regularly tour routes in service vehicles, are present at transfer centers, and ride along on revenue vehicles.

Riskrating Likelihood:	Moderate
Riskrating Severity:	Moderate
Consequence Likelihood:	Low
Consequence Severity:	Moderate

   - *Effectiveness:* Effective. Instances of vandalism, loitering, and general issues at transfer center locations have decreased significantly since contracting with Sundown Security as well as increased police presence. Road Supervisor/Transit personnel presence has also been shown to reduce instances of issues with both passengers and the general public.

8. **Communication Protocols**
   - *Description*: Internal covert communication policies, if possible, from operators in the field; operator asks about detours on Sunday via two-way radio to alert dispatch as MET Transit does not currently offer Sunday service. Further, MET utilizes private channels for discussion via two-way radio of incidents.

Riskrating Likelihood:	Moderate
Riskrating Severity:	Moderate
Consequence Likelihood:	Moderate
Consequence Severity:	Moderate

- *Effectiveness:* Not yet determined. Covert communications via 2-way have not yet been assessed as the need to utilize has not arisen. Private channel communications are not always effective as fleet operators tend to change channels to "listen in" even when the situation does not involve their vehicle. MET is exploring options to expand available communications via the AVL system, cellular systems, and other protocols.

9. **Other**
   - *Description*: MET Transit's primary facility is protected and secured with chain link fencing on all sides. MET has had two (2) automatic opening/closing gates installed at both entrances into the lot. In addition to these gates, MET has invested in RFID technology that will allow gates to open automatically when vehicles with installed headlight/window tags approach. Additionally, pedestrian gates have security hardware installed requiring coded entry for access. MET Transit transfer centers are equipped with secure access coded locks granting access to employees only.

Riskrating Likelihood:	Moderate
Riskrating Severity:	Moderate
Consequence Likelihood:	Low
Consequence Severity:	Moderate

   - *Effectiveness*: Effective. The MET Transit facility has been fenced since its construction in 1983; coded security locks were added in 2018. Unauthorized access to the facility is rare.

Mitigation	Status	Actual Start Date	Projected Completion Date	Estimated Progress
Signage Informing Riders of Surveillance/Penalties	In progress since July 2010		May 31, 2025	80%
De-Escalation Training	In progress	July 2019	May 31, 2025	20%
Operating Policies & Procedures	Update as needed	March 2019	July 2019	Complete
Video/Audio Surveillance	Complete	July 2010	July 2010	Complete
Covert/Overt Emergency Alarms	Complete	July 2005	July 2005	Complete
Automatic Vehicle Location	Update as needed	Feb 2018	November 2018	Complete
Patrol Strategies	In progress	March 2022	May 2022	Complete
Communication Protocols	Complete	July 2019	July 2019	Complete
Other	Complete	July 2019	July 2019	Complete