



**Definitions:**

- **Pending:** The decision has been made to take action on the recommendation, but it has not yet been implemented.
- **Complete:** This means that: (1) the recommendation has been accepted and implemented, or (2) changes have been made to meet the spirit of the recommendation.
- **Further review:** The decision to pursue the recommendation will require further discussion with TriMet’s partners.
- **Closed:** The recommendation was rejected because: (1) the reviewer was mistaken or lacked enough information to make an informed recommendation, or (2) it was carefully considered and TriMet made a conscious decision to not implement the recommendation.

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
<b>PHASE 1</b>		
<b><i>Rail Operations Rule Book (RORB)</i></b>		
<p>Item 1, Page 3: There is no written procedure as to how changes and updates to rule books are issued to employees.</p>	<p>A new standard operating procedure (SOP 002: Changes and Updates to Rule Books and SOPs) was developed and approved by Transit Change Review Committee (TCRC).</p>	Complete
<p>Item 2, Page 3: The current organization of the Rail Operator Rule Book does not allow for easy grouping of some rules and procedures.</p>	<p>The newest version of the RORB is the result of consolidating information and procedures for work groups that are sharing the Right of Way, along with significant employee involvement in the update. The organization of the RORB has been determined to work well for employees in this unique environment. Item considered and determined no change necessary.</p>	Closed
<p>Item 3, Page 3: The discussion pertaining to train orders, verbal orders, and special instructions priority is confusing.</p>	<p>This language has been updated and will be approved in January 2011. Rail Operator Rule Book will be updated and reissued in June 2011.</p>	Pending
<p>Item 4, Page 3: Worker Protection on the Right of Way is located in two separate locations within the book.</p>	<p>The information is placed in the book based on existing organization and has specific information to each distinct audience (i.e., information for operator is different than information for Maintenance of Way personnel because duties are different). Item considered and determined no change necessary.</p>	Closed
<p>Item 5, Page 3: Consolidate the designated employee/lookout/flagger/watchperson functions, and clarify the difference between right-of-way work and work on or near tracks.</p>	<p>The information is clearly defined for TriMet workers and has been determined to work well in this unique environment. Item considered and determined no change necessary.</p>	Closed
<p>Item 6, Page 3: Add a section discussing the Overhead Catenary System (OCS) hazard.</p>	<p>The OCS hazard is covered in Section G.12.0 Electrical Device Safety. Hazard is identified and described in G.12.0.C. No change needed.</p>	Closed
<p>Item 7, Page 3: There is no mention of manual block operation in the Rail Operator Rule Book other than a definition.</p>	<p>This language will be clarified when the RORB is updated and reissued in June 2011.</p>	Pending

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
<b><i>Rail Standard Operating Procedures (SOPs)</i></b>		
<p>Item 8, Page 3: TriMet should look for opportunities to consolidate instructions, precautions or tasks that are common throughout the system.</p>	<p>This is an ongoing process that will continue as revisions are made to SOPs in preparation for the Portland-Milwaukie Light Rail Project.</p>	<p>Closed</p>
<b><i>Bus Operator Standard Operating Procedures (SOPs)</i></b>		
<p>Item 9, page 4: Operators should carry their rules and procedures with them while on duty, and a portable version should be made available.</p>	<p>Portable Bus Operator Procedure Manual has been developed. Approval of distribution plan will occur in January 2011 and distribution will begin April 2011.</p>	<p>Pending</p>
<p>Item 10, Page 4: The use of the term “train” should be clear in its reference to a “training” activity and distinguishable from any reference to a vehicle (train).</p>	<p>Training materials have been updated to eliminate any confusion around the term “train.”</p>	<p>Complete</p>
<p>Item 11, Page 4: SOP B101 provides for notices, memos and announcements regarding permanent or temporary SOP changes, but does not explain the procedures by which these changes are distributed to all operators nor how their receipt and understanding by operators are verified.</p>	<p>When the Bus Operator Procedure Manual is issued in April 2011, the introduction will include information about where up-to-date versions are kept electronically and in hard copy, and how updates are communicated in between annual updates to the BOPM.</p>	<p>Pending</p>
<p>Item 12, Page 5: SOP B101: There should be an exception to refusing an assignment or order when the operator can provide reasonable cause that doing so is unsafe.</p>	<p>SOP updated indicating that if an operator believes that carrying out the instruction or order would risk the health and safety of any person, they may request that carrying out the order be delayed until the situation has been reviewed by a manager or lead supervisor.</p>	<p>Complete</p>
<p>Item 13, Page 5: SOP B101: It is recommended that TriMet expect that no crime of any nature be committed while on duty.</p>	<p>SOP updated to indicate that an operator is not to commit any crime while on duty, in uniform, or on TriMet property.</p>	<p>Complete</p>
<p>Item 14, Page 5: SOP B101 reads, “Take friends, family members, or animals on board your bus during your run for any non-transportation-related purpose.” It does not reference service animals.</p>	<p>Operators are not allowed to bring any type of animal aboard the bus, including a service animal. Item considered and determined no change necessary.</p>	<p>Closed</p>

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
<p>Item 15, Page 5: SOP B104: In #6, operators are required to report any conviction of DUI to the station management; however, there is no time frame for doing so.</p>	<p>SOP has been updated to clarify language. Conviction of a DUI results in the immediate suspension of an operator's commercial driver's license. Operators must notify station management within one business day if their license is suspended, revoked or canceled, or if they are disqualified from driving or medical card is suspended, revoked or pending suspension.</p>	<p>Complete</p>
<p>Item 16, Page 5: SOP B104: In #8, there is a requirement that operators who have not operated in service for 30 days or more for any reason other than vacation must complete refresher training. Should include operators gone for any reason.</p>	<p>SOP updated to say operators who have not operated in service for 30 days or more for any reason must complete refresher training prior to returning to service.</p>	<p>Complete</p>
<p>Item 17, Page 5: SOP B106: The uniform exemption should stipulate that it will only be granted if the exemption does not interfere with safe operation of the vehicle.</p>	<p>SOP updated to say that no Uniform Exemption Card shall be issued that allows or excludes any item or requirement that may compromise safety.</p>	<p>Complete</p>
<p>Item 18, Page 5: SOP B201 and B202: The operator inspections should also include security sweeps.</p>	<p>SOPs updated to say that operator will conduct a walk-through security sweep of the bus.</p>	<p>Complete</p>
<p>Item 19, Page 5: SOP B204: It is recommended that security procedures should be added to yard operating procedures.</p>	<p>Section added to SOP on yard security.</p>	<p>Complete</p>
<p>Item 20, Page 5: SOP B204: It is recommended that TriMet require the use of a spotter or guide for all reverse operations.</p>	<p>TriMet has a procedure (SOP B810: Backing up the Bus) that addresses the safety issues of backing a bus. Item considered and determined no change necessary.</p>	<p>Closed</p>
<p>Item 21, Page 6: SOP B301: Under "General Communications Expectations," the operator is, under #3, required to "confirm the receipt of instructions and information from Dispatch." The safest practice is not to simply confirm, but to repeat any special instruction or information from the dispatcher (readback) and have the dispatcher confirm the instruction (hearback).</p>	<p>The Dispatch SOP Manual has been revised to require readback/hearback and distributed. Training following up with implementation complete January 2011.</p>	<p>Pending</p>

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
<p>Item 22, Page 6: SOP B801: Indicates that no audio or video device of any kind shall be used or visible while an operator is in the driver's seat. It is recommended that TriMet institute a prohibition on the open possession, use or attention to any personal electronic device while operating any District vehicle.</p>	<p>A new SOP was developed (B812: Controlling Operator Driving Distractions) that prohibits the use of any electronic device while in the driver's seat, and requires them to be stowed in the off position.</p>	<p>Complete</p>
<p>Item 23, Page 6: No device should be used while operating a motor vehicle, whether approved for work use or not.</p>	<p>A new SOP was developed (B812: Controlling Operator Driving Distractions) that prohibits the use of any electronic device while in the driver's seat, and requires them to be stowed in the off position.</p> <p>The use of agency-provided radio devices for work purposes while operating a TriMet vehicle is at times necessary, and allowed. Operators are encouraged to pull over to use these devices when possible.</p>	<p>Closed</p>
<p>Item 24, Page 6: SOP B803: Indicates that operators should not drive through water deep enough to reach the bottom of the front stairwell. This is not a safe instruction.</p>	<p>SOP was modified to be more descriptive about hazards of driving through water and what operators should do to ensure safety.</p>	<p>Complete</p>
<p>Item 25, Page 7: SOP B804: For safety reasons, it is important to emphasize in the SOP that operators observe the passengers after they have boarded to ensure that they are safely seated and situated in such a manner that they are prepared for bus movement.</p>	<p>SOP was modified to require operators to check that customers appear ready for the bus to move.</p>	<p>Complete</p>
<p>Item 26, Page 7: SOP B901: Includes security procedures for operators. It is better to integrate the security procedures into the appropriate activities, rules and procedures rather than have them be separate.</p>	<p>Broad responsibilities such as security and safety require some generalizing and one-stop guidance to ensure that operators are aware of the expectations. Existing procedure will be kept in place, but as TriMet reviews and revises SOPs there will be more specificity on security matters where appropriate.</p>	<p>Closed</p>
<p>Item 27, Page 7: SOP B903: It is recommended that TriMet clearly define "accident" and "incident" in this procedure.</p>	<p>The definition is included in the "Purpose" section: Any accident or incident—no matter how minor— involving contact between any part of your bus and any vehicle, object, or person must be immediately reported to dispatch. This definition is simple and facilitates reporting. Item considered and determined no change necessary.</p>	<p>Closed</p>

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
<p>Item 28, Page 7: TriMet is advised to include as many examples in training classes as it feels illustrates the many ways that incidents resulting from poor operation of a vehicle are reportable</p>	<p>All training materials have been expanded and clarified regarding which incidents require reporting and strongly emphasize the potential consequences of poor vehicle operation.</p>	<p>Complete</p>
<p>Item 29, Page 7: SOP B903: The procedure should include the process by which a supervisor, manager or other authority makes the determination that the operator may continue in service.</p>	<p>The reference to requiring guidance from a supervisor or manager in this context is to underscore that continuation in service is not a decision left to the operator. The process for a supervisor or manager to make a determination results from the incident investigation itself, SOP 576: Accident/Incident Investigation is the primary guide in this case. Item considered and determined no change necessary.</p>	<p>Closed</p>
<p>Item 30, Page 7: SOP B904: The procedure should include the process by which a supervisor, manager or other authority makes the determination that the operator may continue.</p>	<p>The reference to requiring guidance from a supervisor or manager in this context is to underscore that continuation in service is not a decision left to the operator. The process for a supervisor or manager to make a determination results from the incident investigation itself, SOP 576: Accident/Incident Investigation is the primary guide in this case. Item considered and determined no change necessary.</p>	<p>Closed</p>
<p>Item 31, Page 7: SOP B909: Define for operators what situations constitute an event severe enough to require evacuation.</p>	<p>It is not possible to codify every potential instance where an evacuation may be needed. We have to rely on operator assessment of the situation and their ability to exercise professional judgment. The intent of the SOP is to provide guidance on conducting a safe and effective evacuation. Item considered and determined no change necessary.</p>	<p>Closed</p>
<p><b><i>Bus Operator Standard Operating Procedures (SOPs)</i></b></p>		
<p>Item 32, Page 8: Industry best practices dictate that bus operators be recertified in rules and procedures and emergency operations, if not annually, then at least biennially.</p>	<p>The annual Operator Professional Development (OPD) training program has been redesigned as a "bus operator recertification program." Funding for this program and for additional training staff to support has been allocated. Program development is underway and training campaign scheduled to begin April 18, 2011.</p>	<p>Pending</p>

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
Item 33, Page 8: The security training indicated in the Operator Training manual should be reviewed and updated.	A complete review and update of all training programs and materials is underway and will be complete by February 28, 2011.	Pending
Item 34, Page 8: There did not appear to be specific training on the use of the silent alarm.	Training on use of the Silent Alarm exists but was not provided to the reviewer.	Closed
Item 35, Page 8: The section on Over The Counter (OTC) drugs does not provide a list of available OTC drugs that may potentially cause impairment.	A list of non-prescription OTC drugs has been added showing categories of drugs that may have side effects that could cause impairment.	Complete
<b>Bus Stops Guidelines</b>		
Item 36, Page 9: It is recommended that the bus stop guidelines be reviewed on a regular schedule of every two years.	A major update was made and the document will be updated every two years from now on and posted on the TriMet website.	Complete
Item 37, Page 9: Bus Stop Guidelines do not make much mention of "security."	Bus stop safety is emphasized. Security elements were not broadened in the update as this topic is outside of the scope.	Closed
Item 38, Page 9: In the section on stop placement, it should be emphasized that mid-block placement is the least desirable of all placements, and should be avoided unless there is absolutely no other alternative.	Document has been updated with new language on preference and priority for stop placement with midblock being the least desirable option.	Complete
Item 39, Page 10: It is recommended that "Safety" be elevated to the primary position in considerations for customer information tools on page 15 of the bus stop guidelines.	Document has been updated with "safety" as primary focus in things to consider.	Complete
<b>System Safety Program Plan (SSPP)</b>		
Item 40, Page 10: Contrary to system safety principles and the recommendations of the FTA and the NTSB, the Manager of System Safety is four levels down in the organization.	TriMet is currently recruiting for a safety executive that will report directly to the general manager. Changes in progress.	Pending
Item 41, Page 10: In section C.4, it is recommended that the matrix use titles rather than names to indicate responsibility.	Names Removed.	Complete

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
<p>Item 42, Page 11: Section D.2 refers to the Transit Change Review Committee (TCRC) as having the primary responsibility for reviewing changes to the SSPP, but, this task is not listed as part of the responsibilities of the committee in the appendix.</p>	<p>Added to Appendix B.</p>	<p>Complete</p>
<p>Item 43, Page 11: It is suggested that TriMet clarify what major system changes necessitate a review of the SSPP.</p>	<p>Clarification added.</p>	<p>Complete</p>
<p>Item 44, Page 11: The Safety and Security Certification process should be the primary mode of hazard identification for new extensions, and section E1.1 of the SSPP should note such in this section.</p>	<p>Language has been added.</p>	<p>Complete</p>
<p>Item 45, Page 11: Section E.2.4 indicates that ad hoc reporting takes place, but only verbally. The SSPP should state the method used to ensure all safety hazards are properly documented and tracked to closure.</p>	<p>Ad hoc reporting is incorporated into the Accident/Incident Database. Clarification added.</p>	<p>Complete</p>
<p>Item 46, Page 11: System safety practitioners in the public transit arena use the guideline in Mil-STD 882C as it is most readily translatable to transit operations.</p>	<p>Correction made.</p>	<p>Complete</p>
<p>Item 47, Page 12: In section E.6, the hazard matrix indicates that the third lowest level of hazard categorization is "Acceptable with review;" however, it does not say who is responsible for this review.</p>	<p>The responsible reviewer is the Transit Change Review Committee. Information added to section.</p>	<p>Complete</p>
<p>Item 48, Page 12: Section F.3 should indicate that a post-accident hazard analysis will be performed by the safety department to ensure that no new hazards are introduced into the system by the circumstances of the accident and immediate corrective actions.</p>	<p>Information added in F.3 and Appendix B.</p>	<p>Complete</p>
<p>Item 49, Page 12: Section G.1 needs clarification of the role of the safety department, potential conflicts of interest and external audits.</p>	<p>Clarification added to section.</p>	<p>Complete</p>

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<p>Item 50, Page 12: The last paragraph of Section I states that independent assessments of maintenance and inspections programs are performed “on a risk basis.” This term is almost always applied solely to financial (stock) transactions; it is recommended that TriMet delete this phrase in the interest of clarity.</p>	Deleted.	Complete
<p>Item 51, Page 12: Section J.1 indicates that rules and procedures are reviewed, but it does not indicate an interval at which this occurs.</p>	Section modified to say that rules and procedures are reviewed annually.	Complete
<p>Item 52, Page 12: Section K.7 indicates that rail operators receive “Observation Rides.” However, there is no indication that bus operators receive any evaluation of this type.</p>	Bus operators are assessed through observation rides. Information was added to the SSPP to reflect this.	Complete
<p>Item 53, Page 12: Section I.3 indicates that “periodic” emergency preparedness drills are held. TriMet should clarify what that period is, and ensure it is in line with industry recommendations.</p>	This information has been added into the SSPP.	Complete
<p>Item 54, Page 13: Review of all major system safety and security documentation should be accomplished on an annual basis. These documents should also be covered by configuration management procedures in Section P.</p>	The SSPP is reviewed on an annual basis. This information is included in section D1 of the SSPP.	Closed
<p>Item 55, Page 13: Section O is titled “Interdepartmental and Interagency Coordination;” however, this section should be re-titled “System Safety Responsibilities” to improve clarity.</p>	TriMet uses the American Public Transportation Association (APTA) format. Changes will be made as APTA updates and changes its format.	Closed
<p>Item 56, Page 13: In section P, the primary purpose for change control is hazard identification and assessment, which should be clarified in this section.</p>	Clarification added.	Complete
<p>Item 57, Page 13: TriMet should have an agency-wide configuration management policy.</p>	TriMet has an agency-wide configuration management committee, called the Transit Change Review Committee. It will be re-chartered in January 2011, and its purpose and scope will be clearly communicated across the agency.	Pending

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<p>Item 58, Page 13: It is recommended that TriMet undertake a review of its committees and make recommendations for streamlining committees and developing membership standards.</p>	<p>OSHA requires that we have a number of safety committees, and participation is open. Additional committee memberships are referred to in Appendix B of the SSPP.</p>	<p>Closed</p>
<b><i>Operational Best Practices</i></b>		
<p>Item 59, Page 15: TriMet training materials indicate that turns should be made at five miles per hour or less. This should be reinforced in a standard operating procedure.</p>	<p>SOP B801: Bus Operating Rules was updated to include the instruction to make turns at five miles per hour or less.</p>	<p>Complete</p>
<b><i>Best Practices, Working with Partners</i></b>		
<p>Item 60, Page 15: Buses carrying passengers should not make right or left turns on red even if it is legal for motor vehicles at that intersection.</p>	<p>In consultation with City of Portland, TriMet determined that implementation of such a policy would need to be made on a case-by-case basis, using context specific data to determine if there are safety issues that warrant such a change.</p> <p>The work of the Safety &amp; Service Excellence Task Force identified the need for ongoing review of safety “hot spots.” TriMet is committed to reviewing these areas of safety concern with its partners.</p>	<p>Closed</p>
<p>Item 61, Page 16: Limit buses to restrictive left turns only.</p>	<p>There are very few restrictive left turns in the city of Portland. In consultation with City of Portland, determined that local and nationwide trends are leaning toward permissive rather than restrictive turning signals. However, they should be considered on a case-by-case basis, using context specific data to determine if there are safety issues that warrant such a change.</p> <p>The work of the Safety &amp; Service Excellence Task Force identified the need for ongoing review of safety “hot spots.” TriMet is committed to reviewing these areas of safety concern with its partners.</p>	<p>Closed</p>
<p>Item 62, Page 16: Working with the local jurisdiction to restrict pedestrian “walk” signals so that they do not coincide with the left-turn arrow.</p>	<p>Currently, pedestrian walk signals do not coincide with left turn arrows, but do coincide with green lights with no left turn arrows. Again, trends are leaning toward permissive rather than restrictive turning signals. The City of Portland does not plan to change this, but is willing to review on a case-by-case basis using context specific data to determine if there are safety issues that warrant such a change.</p> <p>The work of the Safety &amp; Service Excellence Task Force identified the need for ongoing review of safety “hot spots.” TriMet is committed to reviewing these areas of safety concern with its partners.</p>	<p>Closed</p>

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<p>Item 63, Page 16: Work with the local jurisdictions, use embedded lights in pedestrian crossing (flashing) to indicate when it is OK for pedestrians to cross and to alert operators that pedestrians are in the crosswalk.</p>	<p>Preliminary discussion held with the City of Portland. This is one of multiple possible treatments that could be considered. They have experimented with this and believe that it is not as visible as eye-level treatments or rapid flash beacons. They also present unique maintenance challenges, and are not necessarily for use at heavily traveled intersections. The City is open to consider on a case-by-case basis using context specific data to determine if there are safety issues that warrant such a device.</p> <p>The work of the Safety &amp; Service Excellence Task Force identified the need for ongoing review of safety "hot spots." TriMet is committed to reviewing these areas of safety concern with its partners.</p>	Closed
<p>Item 64, Page 16: Work with the local jurisdiction, have particular intersections with lots of pedestrian traffic operate with a pedestrian-only cycle at peak pedestrian times.</p>	<p>In consultation with the City of Portland, this treatment determined to be unsuitable for downtown Portland as they would have to add another phase to the signal cycle. This would have many unintended consequences that could negatively impact safety. Should be looked at case-by-case in other locations.</p> <p>The work of the Safety &amp; Service Excellence Task Force identified the need for ongoing review of safety "hot spots." TriMet is committed to reviewing these areas of safety concern with its partners.</p>	Closed
<p>Item 65, Page 18: Install warning devices with audible beeping for left and right turns.</p>	<p>We have met with the vendor who provides this equipment to Cleveland, and have requested demonstration models that we can install on TriMet buses to test.</p>	Pending
<p>Item 66, Page 18: Blow the horn before making the left hand turn.</p>	<p>There may be noise issues with neighboring businesses or residents. Also raises concerns about removing hand from steering wheel during a turn. Further discussion with partners will be necessary.</p>	Further review
<b>Other Best Practices</b>		
<p>Item 67, Page 18: Add decals to the rear of the bus to warn motorists of frequent stops at intersections.</p>	<p>Training recommends against as it will distract from existing Yield Light and compete with advertising for motorist attention. Motorists who are able to read such a sign are already stopped. Motorists who rear-end bus will not have time to read. Motorists in the service district are aware that buses stop frequently. Item considered and no change necessary.</p>	Closed

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Item 68, Page 18: Distribute passenger safety tips.	TriMet does this through various channels, including our website, channel cards aboard vehicles, through the "Rider Insider" newsletter and using social media online with TriMet TV episodes. This material was not looked at by the reviewer.	Closed
Item 69, Page 18: Job Safety Briefings should be conducted with operators on a quarterly basis, and an operator safety outreach program should be put in place.	We communicate through driver evaluations, supervisors in the field, training bulletins and talk to Operators during quarterly signups. Following the work of the Safety & Service Excellence Task Force we will be implementing additional opportunities for discussing safety with all employees. Deadline for outreach plan: January 2011.	Pending
<b><i>Transit Change Review Committee (TCRC) Process</i></b>		
Item 70, Page 22: SOP 576: It would be helpful if a numbering system were used to reference the various sections instead of bullets.	SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.	Complete
Item 71, Page 22: SOP 576: Consider creating an accident investigation kit, if one is not being used, or at least a list of equipment that would aid the field investigation.	Field Supervisors have kits that include basic items for investigation. No change necessary.	Closed
Item 72, Page 22: SOP 576: Consider identifying a checklist of activities that need to be performed in the field.	Controllers maintain various checklists for this purpose and communicate directly with field personnel. Refresher training for field supervisors will be provided annually either in class or through an e-mail distribution.	Complete
Item 73, Page 22: SOP 576: The sections relating to Notification of an Accident/Incident should be consolidated into a specific section for notification and should reference other related SOPs.	The language referring to incident notification has been removed from SOP 576, as it already exists in detail in SOP 051: Incident Notification.	Complete
Item 74, Page 22: SOP 576: Activities that are not specifically related to Accident Investigation should be moved to more appropriate SOPs.	SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.	Complete
Item 75, Page 22: SOP 576: Consider the use of a flow chart or matrix to show the activities for the field part of the investigation process.	SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.	Complete

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<p>Item 76, Page 22: SOP 576: Consider utilizing the Rail Supervisor as the lead investigator for minor accidents/incidents and designating the Safety Office Representative as the lead investigator for major accidents/incidents.</p>	<p>The difference in investigatory responsibility between major/minor incidents has been integrated into SOP 576, which has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 77, Page 23: SOP 576: Consider having an authorizing signature on the SOP.</p>	<p>Executive signature process already in place via the approval cover sheet. No change necessary.</p>	<p>Closed</p>
<p>Item 78, Page 23: SOP 576: Page 1, under "Purpose" - Consider adding "49 CFR Part 659" as a reference.</p>	<p>Reference added to SOP 576, which has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 79, Page 23: SOP 576: Page 1, "Statement of Principles" should include "to preclude reoccurrence" as an objective.</p>	<p>Language has been added as an objective in SOP 576, which has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 80, Page 23: SOP 576: Page 2, this section is defining what major and minor accident/incidents are and should be separated from "Statement of Principles".</p>	<p>SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 81, Page 23: SOP 576: Page 3, second bullet: this conflicts with the responsibilities of the Safety Representative who is to coordinate with ODOT.</p>	<p>Notifications are sent by e-mail to ODOT. The Safety Office follows up with reports and phone calls, as needed. No change necessary.</p>	<p>Closed</p>
<p>Item 82, Page 23: SOP 576: Page 4, fourth bullet, all of the procedures from "Duties and Responsibilities" to this point (starting The Safety Office Representative) are related to emergency response and not to accident/incident investigation. They should exist in other SOPs.</p>	<p>SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 83, Page 23: SOP 576: Page 4, last bullet, this paragraph should be used to identify the team and the last sentence should be eliminated. The Safety Office Rep will activate the team as previously described.</p>	<p>Paragraphs re-written to reflect the process. Any Director or the Safety manager can request the Safety Dept. to take the lead in an investigation. SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>

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<p>Item 84, Page 23: SOP 576: Page 5, third to last bullet, the Safety Office Rep is to receive all reports. If the Controller is collecting these online, the SOP should reflect that.</p>	<p>SOP now reflects that reports are online. SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 85, Page 23: SOP 576: Page 6, all procedures under "Object in Trackway Struck by Train" are related to emergency response and not accident/incident investigation.</p>	<p>SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 86, Page 23: SOP 576: Page 8, first bullet, a "Rail Investigating Supervisor" is listed under "Rail Supervisor's role. This individual's duties and responsibilities have not previously been provided. This person should not be the "Rail Supervisor" who is Incident Commander.</p>	<p>The word "investigating" in the title was included in error and has been corrected. SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 87, Page 23: SOP 576: Page 8, second bullet, not just be alert to safety hazards, but take steps to protect personnel from the safety hazards.</p>	<p>SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 88, Page 23: SOP 576: Page 8, sixth bullet, once the Supervisor begins to provide first aid, he becomes committed to that task. Sounds good but is not practical.</p>	<p>SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 89, Page 23: SOP 576: Page 8, the extensive tasks listed for the Rail Investigating Supervisor are probably not going to be accomplished by one individual considering the urgency to restore revenue service. Also, in question is the broad background this individual must possess to perform the specialized tasks being required. This individual probably should be supervising others who are performing the tasks.</p>	<p>The word "investigating" in the title was included in error and has been corrected. It's presence gives an inaccurate picture of what the Rail Supervisor will be doing on scene. SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 90, Page 24: SOP 576: Page 10, the activities described under the bullet starting "All fatalities involving TriMet vehicles" are related to emergency response more than investigation. Fatalities are already listed under Major Accidents/Incidents on page 2.</p>	<p>SOP 576 has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
<p>Item 91, Page 24: SOP 576: Page 10, who has the responsibility to ensure that photographs are taken? The rest of the material is good photographic information for accidents.</p>	<p>The supervisor is responsible, and this is now part of the SOP, which has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>
<p>Item 92, Page 24: SOP 001: This SOP may benefit from a more quantified definition of a major accident or incident.</p>	<p>This definition is used in the SSPP and is standard at TriMet. No change necessary.</p>	<p>Closed</p>
<p>Item 93, Page 24: SOP 001: Reference the standard that is being used for an “unacceptable hazardous condition,” such as Mil Standard 882 or other appropriate source.</p>	<p>SSPP is referenced and the Mil Standard is referenced in the SSPP.</p>	<p>Closed</p>
<p>Item 94, Page 24: SOP 001: If another SOP is being used for configuration control of in-service equipment, it should be referenced. If not, consider developing an SOP for configuration control.</p>	<p>This item will be resolved in the re-charter of the Transit Change Review Committee (see Item 52).</p>	<p>Complete</p>
<p>Item 95, Page 24: SOP 001: This SOP is reactive to accidents/incidents that have occurred as a source of committee activity. If there is a hazard identification process and procedure or trend analysis using historical safety data, these could also be part of the committee activities as a proactive approach.</p>	<p>Item 12 in SOP 001 states: TCRC reviews safety and system performance measures and indicators on an on-going basis and initiates review or changes in SOPs, training, and/or system configuration as needed to proactively address any emerging concerns.</p> <p>No change necessary.</p>	<p>Closed</p>
<p>Item 96, Page 24: SOP 001: SOP provides for one vote for each member but does not address if a simple majority is sufficient to approve a committee item or how the counting of votes is accomplished.</p>	<p>It states that a majority vote is needed. Voting is done by saying “aye/nay” or by a show of hands, but is not formalized. No change necessary.</p>	<p>Closed</p>
<p>Item 97, Page 24: SOP 001: Consider adding to the open items log a date for scheduled completion of the item.</p>	<p>Column has been added for estimated completion, requires review of each item.</p>	<p>Complete</p>
<p>Item 98, Page 24: SOP 217: For standardization, insure the coordination of the definition of “major” incident with existing Accident/Incident Investigation Plans and Emergency Preparedness Plans, as appropriate.</p>	<p>Coordinated with the update of SOP 576, which has been completely rewritten to improve clarity of language and value of the instruction provided.</p>	<p>Complete</p>

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
<p>Item 99, Page 24: SOP 217: The distinction between the urgent review function and the activities of the TCRC should be made clearer.</p>	<p>The SOP has been modified to more clearly state when an urgent review is needed.</p>	<p>Complete</p>
<p>Item 100, Page 25: SOP 217: The list of determinations in #5 includes the restoration of "normal" service. Consideration should be given to including "restricted" or "restrictions to service" in this list of determinations.</p>	<p>Language in SOP has been updated.</p>	<p>Complete</p>
<b>PHASE 2</b>		
<p>Item 1 (Finding 2.), Page 5: Revise and update Bus Stop Guidelines to address as many unique operating conditions as possible.</p>	<p>Document provides guidelines for preferred designs for bus stops and amenities. Unique locations are evaluated on a case-by-case basis. Item considered and determined no change necessary.</p>	<p>Closed</p>
<p>Item 2 (Recommendation A.), Page 6: Establish process for effectively distributing Bus SOP and ensure operators understand them.</p>	<p>Development of a portable Bus Operator Procedure Manual is under way that will be reissued annually. Distribution will begin in early 2011. The distribution process is still being determined. Deadline for finalizing distribution process: January 2011.</p>	<p>Pending</p>
<p>Item 3 (Recommendation B.), Page 7: Member of Safety Dept should be on bus procurement committee.</p>	<p>A member of the Safety Department has been assigned to the committee.</p>	<p>Complete</p>
<p>Item 4 (Recommendation C.), Page 8: New buses should be part of safety and security certification process. <i>(Duplicated in Recommendation F.)</i></p>	<p>This recommendation is adopted into our program and will be part of our future bus procurement.</p>	<p>Complete</p>
<p>Item 5 (Recommendation D.), Page 8: Create a separate Safety and Security Requirements Chapter in the Design Criteria Manual.</p>	<p>Safety and security was put in each of the chapters to ensure the requirements were not forgotten when a designer is looking at the criteria. Sending them to a separate chapter to look for safety and security items was what was done in the past, was not as effective. Now, each chapter has the safety and security certifiable items highlighted throughout the chapters. Security has its own section in some of the chapters. Creating a safety-and-security-only chapter would be a step backwards in how we laid out the update of the design criteria.</p>	<p>Closed</p>

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
Item 6 (Recommendation E.), Page 9: Assign dedicated safety staff to monitor contractor's construction safety programs, separate from safety cert staff.	We are not currently in a construction mode but recommendation will be implemented at the proper time once construction begins.	Complete
Item 7 (Recommendation E., continued), Page 9: Develop minimum requirements for contractor safety supervisor.	Already have minimum requirements developed in the June 2010 Capital Projects Safety Program and for Portland-Milwaukie Light Rail Project.	Closed
Item 8 (Finding 9.), Page 10: Consider adding an additional week to Rail Operator training.	An additional week is being programmed into the next round of rail operator training.	Complete
Item 9 (Recommendation G.), Page 11: Safety should review Observation Ride forms to ensure hazards are tracked to closure.	Any issues discovered during an Observation ride are immediately discussed with the Operator; this is used as a teaching tool. Safety has looked into the process, believes that is it a robust process and does not believe that oversight is necessary at this time.	Closed
Item 10 (Recommendation G.), Page 12: Consider holding employees off work until post accident drug test results are received.	Recommendation considered but not implemented. Management procedure will be developed related to employee fit for duty check prior to return to duty.	Closed
Item 11 (Recommendation J.), Page 14: Periodically review process to refer accidents to the Accident Review Board.	The process is reviewed at least monthly.	Closed
Item 12 (Recommendation K.), Page 15: Bus Operations Safety Committee should invite Service Planning to a meeting to discuss bus routes and promote understanding	The connection between the Operations Safety Committee and various other departments was highlighted in the work of the Safety & Service Excellence Task Force. They recommended that the importance of the committee be elevated. The connection with Service Planning will aid in that effort, and they will be attending the next meeting.	Complete
Item 13 (Recommendation L.), Page 16: Consider having the Public Information Officer respond to accident scenes to talk with news media.	The PIO will now respond to the scene of major accidents/collisions.	Complete

ISSUE/SUGGESTION	WHAT TRIMET HAS DONE	STATUS
Item 14 (Recommendation M.), Page 16: Expand process for developing “good news” stories.	<p>We have developed a public campaign that highlights the outstanding work of our employees, entitled, “Making a Difference.” Stories are being shared internally, with mainstream media and with the public through traditional channels as well as through social media.</p> <p>This is an effort that will require ongoing commitment to finding and telling the stories. We are working with frontline employees to continue to find stories and tell them.</p>	Complete
Item 15 (Recommendation N.), Page 16: Encourage managers to spend time in field and be available to frontline personnel.	The importance of being present and available in the field is being stressed and will be integrated into performance expectations for managers.	Complete
Item 16 (Recommendation O.), Page 17: Consider increasing safety staffing levels.	The budgetary implications are being evaluated, and a staffing level review is needed.	Pending

**Definitions:**

- **Pending:** The decision has been made to take action on the recommendation, but it has not yet been implemented.
- **Complete:** This means that: (1) the recommendation has been accepted and implemented, or (2) changes have been made to meet the spirit of the recommendation.
- **Further review:** The decision to pursue the recommendation will require further discussion with TriMet’s partners.
- **Closed:** The recommendation was rejected because: (1) the reviewer was mistaken or lacked enough information to make an informed recommendation, or (2) it was carefully considered and TriMet made a conscious decision to not implement the recommendation.