



*Managing Commutes - Bridging Communities*

# **Transitions Commute Solutions System Safety Program Plan**

January 4, 2022

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## Management Safety Commitment and Policy Statement

Transitions Commute Solutions, LLC, (Transitions) is committed to providing safe, secure, clean, reliable, and efficient transit services to its patrons. This policy statement serves to express management's commitment to and involvement in providing and maintaining a safe and secure transit system.

In the interest of safety and security, Transitions has developed and adopted this System Safety Program Plan (SSPP). The SSPP is intended to document policies, functions, responsibilities, etc. of the company necessary to achieve a high degree of system safety and applies to all areas of our transit system, including vehicle procurement, vehicle modification, administration, operations, maintenance, etc.

Transitions management is responsible for maintaining a coordinated safety system to identify and prevent unsafe acts and conditions that present a potential danger or threat to public safety.

Management has responsibility for maintaining and implementing the SSPP and complying with the policies, procedures, and standards included in this document.

All departments, personnel, and contract service operators are charged with the responsibility of adhering to this SSPP. Any violation of safety and security practices is subject to appropriate administrative action. Management is ultimately responsible for enforcing the SSPP and maintaining a safe and secure system.

*Justin Rison*

Justin Rison  
President

*Debbie Asbacher*

Debbie Asbacher  
CEO



Managing Commutes - Bridging Communities

## **System Description**

Transitions is a small private transit provider servicing Hendry and Glades Counties. Our mission is to strengthen and connect communities and in doing so, we enable individuals to pursue a fuller life with greater ease and convenience. We accomplish this by leading in the partnering and planning process and make wise investments of physical, economic, and human resources. Hendry-Glades Transit plays an integral role in making the counties more livable while also cutting back reliance on foreign oil and minimizing the stress associated with commuting.

## **Safety Management Policy Communication**

The ability to communicate safety information in a timely and professional manner is important for Transition's Safety Plan to function as intended. The Safety Management Policy Statement and this System Safety Program Plan will be distributed across the organization to be referenced by management and others. Additionally, both the Safety Management System (SMS) Framework and the SSPP will be published on the Transition's website for all employees to utilize.

## **Safety Culture**

Transitions is committed to creating and sustaining a safety culture environment that supports our SMS and recognizes that several principles enable the development and sustainment of a positive safety culture including:

- Recognition that fair and equitable treatment of all employees encourages sharing of safety-related information
- Creating and sustaining an environment that actively seeks out risks and supports hazard and event reporting, to include near misses
- Recognition that inappropriate disciplinary measures can suppress open reporting of risks
- Creating and sustaining an environment where there is an understanding that human errors will occur
- Creating and sustaining an environment that promotes openness and learning from events at Transitions, there is an expectation that all employees actively promote safety in everything they do. This includes two explicit duties that are the responsibility of all employees
- To report any hazard, near-miss, unsafe condition, or incident that occurs, or is otherwise known about
- To openly participate in any investigation that may arise because of any reported hazard, near-miss or event that occurs

Transitions recognizes that employee actions that contribute to hazards and events may be the result of a wide spectrum of behaviors. These include unintentional error, engaging in at-risk behavior (i.e., moving away from desired behavior, not recognizing risks involved, reckless behavior or knowingly puts an employee, customer, or the public in harm's way).

The Transitions policy regarding these behaviors is as follows:

- Unintentional errors will be investigated, and feedback given
- At-Risk behavior will usually warrant a verbal or written record of first counseling
- Reckless behavior (and some circumstances of at-risk behavior) will usually warrant more significant positive counseling/corrective action steps to be taken

We are committed to creating an open and fair safety culture within Transitions that supports our SMS. As we implement this policy, we pledge that our first response to any event will be to investigate fairly the circumstances involved.

## **System Safety Objectives and Goals**

### Objectives

- Reducing transit safety, employee, and environmental risks by better managing Transitions safety risks and setting goals to eliminate or reduce risks.
- Communication of safety risks to employees and their roles and responsibilities related to risks.
- Increase awareness of safety issues at all levels of the company, thereby providing a better framework/structure for management to play a leadership role in addressing safety concerns.
- Continuous improvement of contract organization SMS and risk controls.
- Compliance with all applicable state and federal regulations.
- Foster a culture of change management so that safety issues are identified, and risks are eliminated or reduced in the planning process and delays or other impediments to business goals are avoided.

The purpose of this document is to:

- Establish and document system safety policies and procedures
- Establish a coordinated and documented process to implement the SSPP during the operations of the system in order to achieve system safety goals
- Identify and delegate safety functions and responsibilities to units and personnel within the organization
- Facilitate safety audits to identify, track, and resolve safety program deficiencies.



The SSPP addresses the following safety elements and requirements:

- Safety policies and responsibilities
- Vehicle and equipment standards
- Operational standards and procedures
- Driver selection
- Driver training
- Vehicle maintenance procedures
- Accident Investigation
- Safety data acquisition and analysis

Safety performance measurement will help Transitions monitor safety performance. The measurement and evaluation of safety performance requires a carefully structured program of planning, setting targets, identifying valid measures, conducting proper data analysis, and implementing appropriate follow-up activities. Safety performance measurement is a key aspect of a safety management process and provides the basis for continuous safety improvement. Transitions has established the following goals for the system safety program:

- Achieve a high standard of system safety in all areas of the transit system.
- Develop and maintain a high level of safety awareness among all employees through pre-employment screening and systematic training programs.
- Ensure that system safety is integrated with daily operations through operational standards and procedures, vehicle maintenance, inspections, record keeping, audits, quality assurance and quality control.
- Ensure that all vehicles and equipment operated meet established safety standards.
- Maintain a formal process for accident investigation.
- Ensure a drug free workplace.
- Comply with regulatory requirements.

## SAFETY PERFORMANCE TARGETS

*Targets below are based on review of the previous 2 years of Transition's safety performance data.*

<b>Mode of Transit System</b>	<b>Fatalities (total)</b>	<b>Fatalities (per 100 thousand VRM)</b>	<b>Injuries (total)</b>	<b>Injuries (per 100 thousand VRM)</b>	<b>Safety Events (total)</b>	<b>Safety Events (per 100 thousand VRM)</b>
<b>Fixed Route Bus</b>	0	0	5	0.2	6	0.24
<b>ADA/ Paratransit</b>	0	0	1	0.1	2	0.1

### SSPP Control and Update Procedures

Transitions management will review the SSPP annually, update the document as necessary, and implement the changes. The annual review of the SSPP will be conducted as part of an internal audit beginning January 1st of each calendar year and ending prior to the end of the same calendar year. Necessary updates outside the annual update window will be handled as SSPP addendums which will be incorporated in the body of the SSPP during subsequent annual update.

All proposed changes will be documented by the management as proposed SSPP addendums and distributed to affected parties. Following the approval of any modifications to the SSPP by the President and CEO, management staff will distribute the SSPP addendum to affected parties, with a cover memo highlighting the changes.

## Safety Assurance

The System Safety Program Plan (SSPP) and System Security Plan (SSP) will be jointly reviewed by the Safety Officer, Operations Manager and Executive Director and updated annually, on or before January 1st, then submitted to DOT State Safety Oversight (SSO) for approval and acceptance in accordance with DOT's Bus Transit State Safety Oversight Program Procedures and Standards. The plans may also be revised when and as required by the Executive Safety Committee.

In accordance with Rule 14-90, Transitions will adopt and implement a Security Program Plan (SSP), which covers the security portion of the system safety program. The SSP contains information about prevention, mitigation, preparedness, response, recovery, and associated organizational responsibilities.

The SPP addresses the following hazard and security elements and requirements:

- Security policies, goals, and objectives
- Organization, roles, and responsibilities
- Emergency management processes and procedures for mitigation, preparedness, response, and recovery
- Procedures for investigation of events
- Procedures for the establishment of interfaces with emergency response organizations
- Procedures for interagency coordination with local law enforcement jurisdictions
- Requirements for private contract transit providers that engage in continuous or recurring transportation services for compensation because of a contractual agreement with the bus transit system
- Procedures for SPP maintenance and distribution

The SPP will be adopted separately from the SSPP. Bus transit systems are prohibited by Section 119.071(3) (2), Florida Statutes, from publicly disclosing the SPP, as applicable under any circumstance. The document is maintained in a secure location by the management and access to the document is restricted to select agency personnel and appropriate FDOT personnel exercising oversight in this area. On-site access to the SPP is granted to regulatory authorities (FDOT, FTA, etc.) on as-needed basis.

Select portions of the SPP may be shared with employees depending on their job responsibilities.

## Proficiency Testing – Operator Evaluations

Operational Evaluations serves as the foundation for observing, correcting, and documenting safety related behaviors and activities. It is also used to re-enforce positive safety behaviors. Supervisors, Trainers and the Safety Officer are responsible for conducting periodic field and on-board bus operations safety checks. Supervisors,

Trainers, and the Safety Officer travel along the route/or board buses to observe and evaluate adherence to rules, policies and procedures, verbal or written instructions such as operating procedures, reroutes, and speed limit compliance. Safety checks are recorded on an Evaluation Ride-Along form. Supervisors, Trainers, and the Safety Officer are authorized to take appropriate and immediate actions if indicated by the situation. Each Operator receives at least an annual safety evaluation and Supervisors are required to conduct evaluations as often as possible.

The results of the Bus Safety Evaluation Ride-Along activities are forwarded to the CEO for review and follow-up to correct any identified deficiencies.

## **Contractors and Subcontractors Requirements**

Transitions shall expressly require any subcontractors performing work or providing services pursuant to the contract certify adoption of this SSPP and SPP and remain in compliance with adopted safety and security standards. Each subcontractor will certify:

1. The adoption of the Transitions System Safety Plan (SSPP) and Security Program Plan (SPP) pursuant to Florida Department of Transportation security standards set forth in Rule Chapter 14-90, Florida Administrative Code.
2. The adoption of the Transitions Security Program Plan (SPP) pursuant to Florida Department of Transportation security standards set forth in Rule Chapter 14-90, Florida Administrative Code.
3. Compliance with adopted safety standards in the SSPP.
4. Compliance with the adopted security standards in the SPP.

## **Safety Promotion**

### **Training**

Training tasks include but are not limited to the following:

- Integrates safety requirements into training programs
- Provides feedback to various departments on procedures, rules, designs, and operating conditions as a result of training experiences
- Helps validate safety training effectiveness to assure that training objectives have been met
- Identifies training objectives and participates in safety drills and simulations
- Designs and conducts new operator training/qualification and re-qualification training to ensure that all operators are aware of hazards in the system, are familiar with emergency procedures, and meet operating performance standards
- Reviews and updates training materials at least every two years to comply with operating policies and procedures and results of safety analysis

- Establishes formal procedures for evaluating student understanding of safety rules and procedures as well as actual demonstration of correct techniques at an acceptable level of performance
- Develops and maintains a short range and long-range training plan that identifies what programs will be provided and to how many personnel
- Orientation on basic safety program to all new employees
- Develops training resource materials for safety-related training for all employees
- Assists with providing safety training for outside agencies and contractors, if required

## Training and Awareness

To establish a corporate-level approach which ensures that all employees have the appropriate level of knowledge about the Transitions Safety Management System (SMS) and how the policies, processes and procedure affect how they perform their duties. This aspect of the SMS is a requirement for establishing initial competency and for on-going competence building. Additionally, this is a method for demonstration of the SMS and its contribution to safety culture development.

Transitions will appropriately train employees at each relevant function and level such that they are aware of:

- The SMS Safety Policy
- The SMS Safety Culture Statement
- The SMS manual
- The importance of conformance with SMS
- Individual roles and responsibilities specific to the SMS (Safety Accountabilities)
- General hazard reporting requirements of the SMS
- General risk assessment procedure of the SMS
- General accident/incident or near-miss reporting and investigation requirements
- General responsibilities with respect to the SMS emergency preparedness and response plan
- Operator assault awareness and prevention

Transition's SMS training takes into account different levels of responsibility and risk to ensure that there is an appropriate awareness among employees and managers as to what their role responsibilities are. In accordance with the above policy objectives, Transitions will provide SMS training as follows:

- Senior Leaders/Accountable Managers/Senior Managers: Awareness of SMS roles and responsibilities, safety policy, safety culture policy, SMS requirements, related DOT/FTA regulations, management commitment and responsibilities, and safety performance monitoring responsibilities

- Managers and Supervisors: SMS policy, SMS processes management, management commitment and responsibilities, hazard identification and risk management, safety performance monitoring responsibilities
- Frontline personnel: SMS Overview, safety policy, safety culture policy, safety reporting, hazard identification and risk assessment procedure, accident/incident investigation process

## Competencies

Frontline employees and management competence within the SMS operations will be assured through continuous communication and involvement in the SMS as follows:

Employees shall be:

- Involved in the review of hazard and risk assessments, accident/incident investigation findings and department or process-specific SMS standard operating process development where appropriate
- Consulted where there are workplace changes that occur as a result of SMS-related activities
- Be represented in SMS matters at their location
- Informed as to who their site safety council representatives are
- Informed of significant issues arising from the operation of the SMS at their site; including lessons-learned from hazards, near-miss reports and accident/incident investigation findings

Employee involvement shall be accomplished by:

- Submission of hazard reports
- Involvement in risk assessment results and post-event investigation findings implementation
- Participation in site safety performance monitoring
- Participation in SMS assessments
- Involvement in site safety councils

Managers shall:

- Be involved in the review of hazard and risk assessments, accident/incident investigation findings and department or process-specific SMS standard operating process development where appropriate
- Coordinate workplace changes that need to occur as a result of SMS-related activities
- Lead resolution of SMS matters at their site/department
- Direct their site safety council representatives in ad hoc and regular safety performance reviews
- Coordinate resolution of significant issues arising from the operation of the SMS at their location, including lessons-learned from hazards, near-miss reports, and implementation of accident/incident investigation findings
- Lead monthly site/department safety performance monitoring activities

## Organizational Roles

**Accountable Executive:** Provides strategic direction for safety policy, risk mitigation, safety assurance and promotion.

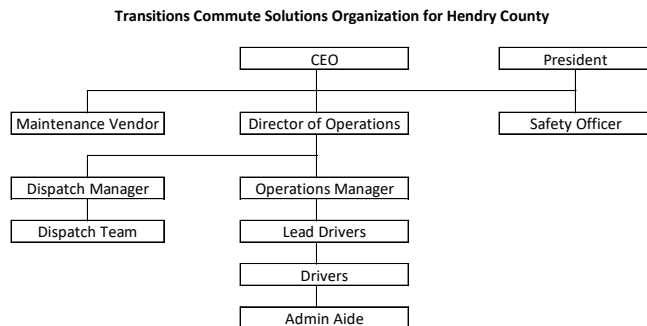
**Safety Officer:** Provides leadership in the operation and performance of SMS, develops and implements innovative strategies that foster continuous SMS improvement in a manner that supports departmental, customer and corporate business plans, goals and objectives.

**Operations Manager:** Manages functions related to site level activities.

### All Personnel

- ⇒ Conduct work in the safest manner possible in accordance with approved site procedure, policies and in a manner that enhances their own/other employees' health and safety.
- ⇒ Promotes risk reduction, participates openly in safety related events investigations and immediately report workplace hazards and make suggestion for control of reported hazards.
- ⇒ Contribute to the overall success of the SMS program at the site level.

## Transitions Organization Chart



## Employee Safety Reporting Program

### Employee Safety Reporting

At Transitions, every employee is involved in safety activities and motivated to identify and reinforce habits and practices that protect staff, riders and the facility. Transitions considers incidents and negative observations as opportunities to improve work systems and communicate observations for the greater good of the organization.

Transitions encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution.

There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the daily Operations Log.

- Report conditions anonymously via a locked comment box in the driver area.
- Report conditions directly to any supervisor, manager, or director.

Examples of information typically reported include:

- Safety concerns in the operating environment (for example, county or city road conditions or the condition of facilities or vehicles).
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection).
- Events that senior managers might not otherwise know about (for example, near misses); and Information about why a safety event occurred (for example, communication challenges).

Daily, the Operations Manager reviews the daily Operations Log and checks the comment box and then documents identified safety conditions in the Safety Risk Register. The Director of Operations will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and resolved through the Transitions process and that reported deficiencies and non-compliance with rules or procedures are managed. The Director of Operations discusses actions taken to address reported safety conditions during quarterly staff meetings and will address all concerns in safety bulletins which will be distributed to drivers and posted in office common areas and on our webpage. Additionally, if the reporting employee provided his or her name during the reporting process, the Director of Operations follows up directly with that employee.

Transitions may take disciplinary action if the report involves any of the following:

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



It is important that employees report hazards they encounter them on the job. Employees are the ones who are most intimately familiar with the details of the job site and that makes their input crucial to maintaining health and safety in the workplace. Many employees, however, are reluctant to report the dangers they encounter, for reasons ranging from fearing reprisal from their managers to simply not feeling comfortable approaching those in higher-up positions. Transitions strives to maintain an environment where workers feel safe to step forward. This means addressing work systems rather than simply 'fixing' employee behaviors and actions.

The Transitions Reporting Program specifies protections for employees who report safety conditions to senior management that describe employee behaviors that may result in disciplinary action.

### Driver Safety Suggestion Box

Transitions has established and implemented a process that allows all employees—including relevant contract employees—to report safety conditions to senior management.

Employees are informed as to the safety information the company needs from employees such as:

- Safety hazards in the operating environment
- Policies and procedures that aren't working as intended
- Events that senior managers might not otherwise know about
- Information about why a safety event occurred

The Transitions office will institute a Safety Suggestion Box for the local office. The box allows employees to make confidential suggestions that might improve the safety of our operators, customers, and the community. The Safety Suggestion Box is always available to employees.

Suggestions are reviewed by the Safety Officer and the Operations Manager and then brought to the attention of the Executive Staff. Once reviewed employees are informed of safety actions taken in response to reports submitted through the employee safety reporting program.

# Safety Risk Management (SRM)

## Risk Management

The management of identified hazards is a vital component of the Transitions Safety Management System. A hazard is defined as a condition or set of conditions, internal or external to the transit system, which when activated could cause injury, death, damage or loss of equipment or property. An unacceptable hazard is a condition that may endanger human life, property or result in system loss. This includes harm to passengers, employees, contractors, equipment, and to the general public. These hazardous conditions must be mitigated or eliminated. Hazards are identified in several different internal and external sources. Hazards may be observed in the operating environment, through procedures, during system modifications and capital projects, accidents, extensions or operational changes. The hazard management program applies to all Transitions employees and obligates everyone to constantly observe hazards in their work areas and report them to the Safety Officer or to their supervisor and/or manager. The overall hazard management program incorporates a system-wide hazard identification process, including activities for:

- Identification
- Investigation
- Evaluation and analysis
- Mitigate or elimination
- Tracking
- Ongoing reporting to FDOT SSO and Transitions management relating to hazard management activities and status.

## Hazard Management

Transitions managers play a key role in the hazard management process and ensure that the process has been fully integrated within their departments. Managers also ensure the following elements of the hazard management process are present in their departments:

- Ensure employees have the ability to report hazards to management in person or through the use of a hazard identification form
- Ensure hazards are placed on a hazard log for tracking and documentation
- Represent management or select designee to represent management on the safety committee
- Ensure each hazard has been assigned to a specific individual /POC
- Ensure employees receive appropriate hazard management training

## Hazard Process Overview

The following lays out an overall description of how hazards are identified, evaluated,

analyzed, controlled or eliminated, tracked and reported to Transitions senior management and FDOT State Safety Oversight.

- All employees are expected and encouraged to participate in safety program activities including reporting hazards, reporting unsafe work practices, near misses, and accidents immediately to their supervisor or a safety representative
- The Safety Officer is the primary point of contact (POC) for the hazard management process
- The Operations Manager has oversight of the identification, evaluation, and analysis of hazards
- Managers will enter identified hazards into the hazard log and forward the hazard report to the responsible POC. The responsible POC, the Safety Officer, assigns a hazard rating
- The responsible department identifies a point of contact or owner of the hazard, places this information on the hazard log for tracking purposes and is responsible for developing a (CAP) Corrective Action Plan (if applicable) for the unacceptable and undesirable hazard
- CAP's may also be identified because of an incident or investigation
- Safety committee members also participate in the evaluation and control or elimination of the hazard
- Hazards must be mitigated at the lowest level practicable.

## Hazard Identification

Identification of hazards is the responsibility of all Transitions employees and contractors. The continuous identification, monitoring, and elimination of hazards is key to an effective system safety program. Hazard identification methods include, but are not limited to the following:

- Observation and inspection findings and recommendations
- Employee reporting
- Reports from safety committee members, passengers, customer service, etc.
- Evaluation of accidents, incidents, near misses, to include data trends and projections
- Preliminary Safety Risk Assessment of a design or new construction
- Safety certification, system integration testing, pre-revenue testing, system modification, configuration management verification, and inspection processes
- Operational Safety Risk Assessment of revenue operations
- Internal and external safety audits, inspections, observations, defects, findings, observations, violations, and reviews
- FTA and other oversight authorities, which provide information based on Federal, State or local findings, research, considerations, or assessments
- Reports from the public, such as motorists, bicyclists, or pedestrians, which may contain safety information such as reckless driving, near misses, unsafe acts, or inattention. These reports will be confirmed by management before being entered as a hazard for SRM

- Safety bulletins and information from manufacturers and transit associations, which may identify issues or concerns

Examples of observed hazards may include:

- security incidents
- biosafety
- confined spaces
- diesel and carbon monoxide emissions
- indoor air quality
- ergonomics in the vehicle and the workplace
- fatigue
- noise and vibration
- power tools and shop equipment
- temperature extremes
- welding, cutting, brazing
- workplace violence
- powered industrial trucks
- fires
- vehicle incidents
- electrical hazards and power failures
- bomb threats
- acts of terrorism
- natural disasters (earthquake, flood, or tornado)
- hazardous material spills or intrusions
- slippery surfaces.
- An uneven sidewalk
- Opening in a section of corridor fencing
- oil or hydraulic leak
- Missing fire extinguisher

The key attributes of effective hazard identification:

- The more comprehensive the data sources and documentation, the more confident management can be that safety concerns are being identified.
- Training employees on proper identification and reporting of safety concerns increases the likelihood that hazards can be addressed.
- Focus on the collection of safety concerns while safety representatives work with operations and management personnel to identify the exact hazard(s); and
- Promote and support agency-wide safety concern reporting and hazard identification.

## Hazard Logs

The Operations Manager is responsible for the maintenance of Hazard Logs. They ensure that all hazards meeting defined criteria are entered onto the Hazard Logs. Hazard rating can be assigned by the Safety Officer. The following are Specific hazards that are identified and mitigated at the management level:

- Unacceptable hazards (High Hazards)
- Hazards identified from audits from outside agency's (FDOT SSO, FTA, and OSHA)
- Hazards identified from accident investigations
- Hazards where corrective action will cost more than \$25,000
- Serious or high hazards on local department hazard log over 180 day
- When warranted by the Safety Department

Hazards identified by an employee to his/her supervisor may be resolved by the employee and supervisor if able. In any case, the supervisor will forward the hazard to a safety representative for entry into the hazard log and routing. Safety will forward the hazard report to the responsible department for review. The Safety Officer can assign an initial hazard rating (IHR) and place the hazard on the hazard log to be tracked.

## Safety Risk Mitigation

Safety Risk Mitigation is defined as the analysis and subsequent actions taken to reduce the hazard to the lowest level practical and the risk associated with an identified hazard. Safety Risk Mitigation is not synonymous with hazard elimination. In a transit environment, there are some hazards, which are impossible to eliminate and others, which are highly impractical to eliminate. Reduction of risk to the lowest practical level can be accomplished in a variety of ways from protective and warning devices to special procedures.

1. Design out or design to minimize hazard severity. To the extent permitted by cost and practicality, identified hazards will be eliminated or controlled by the design of equipment, systems and facilities.
2. Hazards that cannot reasonably be eliminated or controlled through design will be controlled to the extent practicable to an acceptable level through the use of fixed, automatic, or other protective safety design features or devices. Provisions will be made for periodic functional checks of safety devices and training for employees to ensure that system safety objectives are met.
3. When design and safety devices cannot reasonably or effectively eliminate or control an identified hazard, safety warning devices will be used (to the extent practicable) to alert persons to the hazards.
4. Where it is impossible to reasonably eliminate or adequately control a hazard through design of the use of safety warning devices, procedures and training will be used to control the hazard.

Transitions senior staff meets on a regular basis to discuss and plan for emergencies. Those discussions include preparing for natural and man-made emergencies for any part of the transit system.

Operational information that is necessary to keep the service running is shared with front line supervisors and employees when they are first trained, when an emergency situation is anticipated, or when procedures change.

Transitions senior staff is in regular contact with Emergency Management staff members.

Certain items are addressed on a daily basis by Transitions employees. Operators are instructed to look for out of place items or tampering on the buses during their pre- and post-trip inspections. Mechanics working on the buses are also looking out for signs of tampering. Operators are instructed to contact dispatch if they notice anything out of place along their route as they are the eyes and ears of the system.

### Safety Risk Resolution

If Transitions finds the risk to be at an acceptable level, then we can assume the risk. If not, then corrective action and the evaluation process is applied. Once implemented, the corrective action is closely monitored and evaluated to ensure that it is effective. If the corrective action is effective and the issue is resolved, then it is documented and enforced. If the corrective action doesn't resolve the issue, then the problem will be investigated and evaluated until there is a proper resolution.

Reported safety events will be maintained in a way they can be tracked by date, location, route, driver, person/people involved, and activity engaged in. This will allow the agency to track and trend incidents over time. An annual meeting between CEO, Director of Safety, and County Project Administrator will review all safety incidents from the previous year to identify pattern or trends and address them as necessary. If a pattern or trend is seen prior to the annual review, a meeting of the committee can be called to address the current issues.

## Accident/Incident Procedures

Should an incident occur the Transitions operator will initiate the process of incident investigation by notifying management with the notification made immediately to dispatch/supervisor or agency designated staff.

The following procedures must be adhered to by all operators whenever Transitions property, personnel, contractor or patron is involved in an accident or incident:

- Move the vehicle out of the flow of traffic (if possible) to a safe location.
- Ensure the safety of all passengers on board. Attend to any injured patron first.
- When safe to do so, evacuate passengers to a safe location out of traffic.
- Contact dispatch and advise them of the accident/incident. Be sure to give your name, route, location, direction of travel and vehicle number.
- Request for emergency services or transit supervisor via dispatch if required and management should notify the county immediately.
- Unload passengers from the bus to a safe location, only if needed.
- Complete an accident/incident report within 12 hours. The report must be completed and signed by the operator. Submit the report to a supervisor. If requested by the on-scene police, give your name, driver's license number, bus insurance and registration. Never admit any fault or guilt. The Transitions on-duty supervisor (or a designee) will go to all accidents.
- Provide a full copy of all reports including the police report to the County Transit Coordinator.

In addition, the operator:

- Should not discuss the incident with anyone except representatives from their agency and the police
- May provide their name, and the company name.
- Should show a valid driver's license only to law enforcement.
- Should not make any statements, regardless of the circumstance, or get drawn into any discussions or arguments.
- Should not allow vehicles to be moved until someone arrives that can verify or witness the positions of the vehicles, length and position of skid marks, and lights on the vehicle.
- Contact law enforcement and emergency medical transportation if necessary.
- Pass out Courtesy Cards to each passenger and/or witness.

The operator is responsible for completing an incident report. Incident reports should be completed as soon as possible after an incident. As time goes by, the operator's ability to recall specific details about the event will diminish. Every incident must be reported to the agency, regardless of how minor it may seem. Failure to report an incident may be cause for disciplinary action, which will vary depending on the agency.

## Dispatch

It is the main responsibility of the Transitions dispatcher to complete a dispatcher's report once the operator reports an incident. The responsibilities of the dispatcher may vary from agency to agency. It is recommended that the following information be documented when an incident occurs:

- Driver's name
- Number of passengers onboard
- Time of incident
- Vehicle number
- Vehicle location
- Direction of travel
- Type of incident
- Number of vehicles involved
- Injuries (minor or major)
- Nature and severity of injuries
- Number of injuries
- Are emergency personnel required?
- Are police required?
- Are tow vehicles needed?

Transitions will use Basecamp, What'sApp and our own custom created reporting mobile applications to provide a customized communication platform for fleet management. When incidents or accident occur, good communication is key to a successful partnership. Collectively, we will provide accurate data collection in a manner that quickly relays the necessary data points for all involved parties.

## Accident/Incident Investigation

Transitions is responsible for investigating, recording the event, identifying causal factors, and recommending corrective actions. Transitions will investigate, or cause to be investigated, any event involving a bus or taking place on bus transit system-controlled property resulting in a fatality, injury, or property damage:

- A fatality, where an individual is confirmed dead within 30 days of a bus transit system related event, excluding suicides and deaths from illnesses.
- Injuries requiring immediate medical attention away from the scene for two or more individuals.
- Property damage to bus transit system bus(es), non-bus transit system vehicles, other bus system property or facilities, or any other property, except the bus transit system shall have the discretion to investigate events resulting in property damage less than \$1,000.
- Evacuation of a bus due to a life safety event where there is imminent danger to passengers on the bus, excluding evacuations due to operational issues.



The investigation shall be documented in a final report that includes a description of investigation activities, identified causal factors, and any identified corrective action plan. The corrective action plan shall identify the action to be taken by the bus transit system and the schedule for its implementation and the bus transit system will monitor and track the implementation of each corrective action plan. Investigation reports, corrective action plans, and related supporting documentation shall be maintained by the bus transit system a minimum of four years from the date of completion of the investigation.

Transitions will have a system in place for notifying, communicating and recording the information. The persons involved in the investigation will include the general manager, Human Resources manager, operation supervisor, dispatcher and the person responsible for drug and alcohol testing.

In any emergency, the operator's role is to manage the situation to the best of their ability by following the seven basic emergency steps:

- Stay calm
- Assess the situation
- Obtain help
- Protect people then property
- Reassure and assist the passengers
- Secure the scene
- Gather Information

## Vehicle Fire Investigation Procedures

All fires should be investigated by a third-party contractor, and it is important to obtain the fire department investigation report which needs to be incorporated into the agency's incident investigation. The results from the third-party investigator should be shared with all affected personnel. It is important to subsequently develop an action plan that specifically addresses the fault and incorporate any changes to inspections, policies, or procedures immediately.

### The Investigation

An investigation will be conducted as close as possible to the occurrence of an event. It is essential that the response is immediate in order to secure, preserve, and capture the evidence before it deteriorates. There are several tools that are needed to conduct an investigation. These tools should be kept a box in the trunk of the investigator car. These tools include:

- camera with film and extra batteries
- rain gear
- latex gloves
- safety vest
- calculator
- clip board
- paper
- pencil
- spray paint
- tape measure
- measuring wheel
- tape recorder (in working order)
- hammer
- masking tape
- chalk
- courtesy cards
- cell phone
- cones
- Accident, Damage and Incident Report forms
- Drug and Alcohol Testing Notification form
- Sample Interview Questions
- Witness Statement forms
- Employee Incident Report form
- Face mask or face shield

The investigator will secure the scene and collect facts about what has occurred. It is extremely important that the investigator assemble all the facts and information that are available. The investigator should interview the involved operator as quickly as possible after the collision. The operator's account of the collision should be written on the Operators Accident Report form and signed by the operator.

### Collecting Evidence

It is important for the investigator to maintain control of the evidence. While on the scene of the incident, the investigator should collect and note evidence such as marks, debris, and fluid in and around the incident scene. Roadway evidence is helpful in determining vehicle positioning and paths. This evidence consists of tire marks, roadway scars

(scrapes, gouges), debris, markings that suggest the vehicle went airborne, and markings to other objects on or near the roadway.

All evidence must be marked with:

- date and time collected
- location
- identification of collector
- corresponding owner of the other vehicle or property

Transferring of evidence should be done in writing and stored and accessed only by the investigator. Evidence should be stored in a secured location to prevent damaged or alteration. Deterioration of evidence can be caused by weather, the removal of vehicles to “open” the road, the separation of vehicles to aid the injured and the recollection of the human mind to recall what took place.

### Photographing the Scene

The best time to take photos of an accident is immediately after the crash, before police arrive. The closer you can capture the exact position of the cars and have your images document the specific conditions surrounding the collision, the more helpful your photos will be as evidence. Do this if it is safe and there isn't danger from oncoming traffic.

The purpose of these photos is to show the facts of the scene, exactly as they are.

Below are guidelines to use when photographing an accident scene:

- **Get an overview of the scene.** Shoot photos of the entire accident scene from several angles. Try to show the position of the involved vehicles as they relate to each other, to the roadway, and any other objects (buildings, trees, guardrails, etc.) that might be relevant. Be sure that each of the involved vehicles is viewable in a single photo, from various angles, because that's what will help demonstrate perspective.
- **Traffic signals are important.** Photograph the position of traffic lights, signs, and other indicators relative to the crash scene will provide valuable information for accident reconstruction specialists and investigators. Likewise, take photos of the scene that include skid marks, debris, broken glass, or other indicators of how the crash occurred or its aftermath, those can be helpful.
- **How's the weather?** A general overview of weather conditions might show the weather, but if you can take a few photos from the perspective of each driver's relative position at the time of the crash, it might add some detail with respect to other weather factors.
- **Photograph visible damage to each vehicle.** Walk around the perimeter of each vehicle and take close-up photos of dents, scratches, broken glass, deployed airbags, and other visible signs of damage. If it's safe to lean in and photograph the interiors of the cars, do so.

- **Other property damage.** There might be property damage to items belonging to the drivers or passengers of the involved vehicles, and also external property. Look around at guardrails, street signs, sidewalks, lampposts, trees, or anything stationary that might have been damaged in the crash. If there's any significant property damage to items in your car, they should be photographed.
- **People and injuries.** If you are able to take photos of non-injured people for the purposes of later identification, that can be helpful.
- **Document the documents.** Take photos of the other drivers' licenses and registrations, along with any involved vehicles' license plates.

The Event Data Recorder can be programmed to automatically store the higher level of data required for incident investigation.

### The Interview Process

Interviewing, both at the scene of the collision and afterward, is an important component of collision investigations. Interviews will be conducted with operators, drivers of other involved vehicles, non-involved witnesses, police, fire, EMS, passengers and maintenance personnel.

To obtain accurate information from witnesses there is a variety of interviewing tips that can be utilized. Below are several proven techniques:

- Interview witnesses individually. Employees should be interviewed as soon as possible and in private. If the witness talks or listens to others they may become confused and subconsciously change his/her account.
- Always try to interview where the incident took place. Interviewing employees at the site of the incident can help jog their memory, well as allow them to point how-specifically where –something happened.
- Do not play the blame game. Remember the purpose of the investigation is to identify physical hazards, safety system breakdowns, training needs, and behavioral failures. Explain to employees that you are interested to uncover the facts that lead to the incident so corrective action can be taken to make the work site safer.
- Be a good listener. Do not interrupt the witness so they are comfortable in sharing their story.
- Attain pertinent details. Ask open ended questions addressing the who, what, where, when and why of the incident.
- Take notes Be thorough. If you have their permission, record the interview providing a tape copy of the interview to the witness so if necessary, they can clarify any information they gave.
- Be compassionate. Use discretion. Remember if the incident involved a fatality (death) or serious injury the witness could be in shock and be unable to talk about what they saw at that moment. In these cases, you can always delay the interview.
- Use the interview as an opportunity to improve. Remember the point of the accident investigation is to prevent a similar accident from occurring. Solicit ideas

this way employees are shown by management that their voices matter.

After the interviews, the manager should analyze each witness' statement at the conclusion of all interviews. Although there may be inconsistencies in the statements, investigators should assemble the given testimony and analyze the information along with data from the accident site.

### Post-Accident Drug and Alcohol Testing

Testing employees for prohibited drug use and possible alcohol misuse is required after all accidents or "incidents" that meet the FTA established criteria. Transitions Drug and Alcohol Program Manager or Designated Employer Representative is trained to identify which accidents meet the FTA thresholds for drug and alcohol testing; this individual will be notified immediately, following any accident or incident.

All safety-sensitive employees whose actions could have contributed to the accident are subject to post accident drug and alcohol testing when the FTA criteria to test are met. This includes operators, mechanics, dispatchers and others. If it is determined that post-accident drug and alcohol tests are required, the testing must be performed as soon as possible following the accident. If an alcohol test is not administered within 2 hours following the accident, Transitions must still attempt to administer the test. In addition, Transitions must prepare and maintain on file a record stating the reason(s) the test was not promptly administered. If an alcohol test is still not administered within 8 hours following the accident, Transitions will cease attempts to administer an alcohol test and shall maintain records as to why the test was not performed. Likewise, if a drug test has not been performed within the first eight hours following the accident, Transitions will document the reason for delay and continue to attempt to administer the test. After 32 hours, Transitions will cease attempts to conduct the drug test and document why the test was not performed.

### Police Report

Police reports will be important reference documents during the investigation process. These reports will be used, filed, referenced and utilized as tools for the investigator's final findings. Police reports can be used to identify causal factors and to develop recordable accident and disciplinary policies.

### Grading System

Transitions will establish a disciplinary grading policy that addresses negligent acts which results in recordable/ preventable injuries or incidents to employees, passengers or the general public. Disciplinary policies will be set by Transitions. The transit agency or local government agency.

Following is an example of Transitions disciplinary action policy:

1. First Occurrence A verbal warning or a one-day suspension including retraining and a written warning
2. Second Occurrence 15 One-day suspension and a written warning, or up to 5 days suspension and a written warning that one more preventable will be grounds for termination within 12 months of the first preventable.
3. Third Occurrence Terminated or a written warning and three-day suspension.
4. Fourth Occurrence Termination

## **Employee Injury/Incident Reporting**

Any employee who believes that an unsafe or unhealthful condition exists in a workplace where he/she is employed, has the right and obligation to report the unsafe or unhealthful working condition to the Operations Manager (OM) or General Manager (GM). Since many safety and health problems can be eliminated as soon as they are identified, the existence of formal channels of communication does not preclude immediate corrective action by a supervisor or trained staff member in response to oral reports of unsafe or unhealthful working conditions.

### **Controls**

- Any staff should take immediate action to resolve an unsafe working condition.
- Staff should not conduct activities which could result in an accident or injury, to include emergency response activity, when possible.
- Only Transitions employees who have been pre-approved by the office PM or GM may conduct an accident / injury investigation.
- Staff will immediately notify a supervisor of an accident or injury.
- Program Manager will immediately notify human resources of any work-related injury.
- Effective immediately, any accident that occurs will require a Manager / Assistant Manager /or a Drug and Alcohol trained staff member to be physically on-location to review the scene, no matter the hour or type of accident. A driver will NOT be permitted to continue driving.
- The on-location Manager / Assistant Manager / Drug and Alcohol trained staff member must immediately communicate the specifics of the accident (type of accident and damages) to the GM.
- The DER will determine if the driver is approved to continue driving or be removed for completion of testing protocols in accordance with the Drug and Alcohol SOP.

An accident report, when not life threatening, should be reporting within two business days after the staff member reports back to work.

## Violations

- Managers failing to follow this policy, will be held personally liable for any additional negative outcomes based on their actions.
- Falsification of an accident / injury report will result in immediate termination.
- Noted unsafe activities which result in serious accident / injury will result in immediate termination.

## Records Management

Transitions is responsible for implementing a record management program that includes maintenance, retention, distribution, and safe disposal of all safety and security records of the agency.

Transitions annually reviews and updates the SSPP and SPP to ensure compliance with state and federal regulations. Revisions and updates will be communicated to employees, contractors, and regulatory agencies as they occur or as deemed necessary by the management, depending on the nature of the revision or update. The SPP is considered a confidential document and will be retained in a secure location by management.

Transitions will ensure the maintenance and retention of the following records for at least four years:

- Records of bus driver background checks and qualifications.
- Detailed descriptions of training administered and completed by each bus driver.
- A record of each bus driver's duty status which will include total days worked, on-duty hours, driving hours, and time of reporting on and off duty each day.
- Records of preventive maintenance, regular maintenance, inspections, lubrication, and repairs performed for each bus.
- Records of annual safety inspections and documentation of any required corrective actions.
- Completed and signed Medical Examination Certificate (FDOT Form 725-030-11) confirming that biennial medical examinations have been conducted for each driver.

In addition, maintenance will retain records of daily bus inspections and any corrective action documentation for a minimum of two weeks.

Records retention is in accordance with F.A.C. 14-90 and F.A.C R. 1B-24.003(1)(a).

## Vehicle Equipment Standards

Transitions will ensure that buses procured and operated meet the following minimum standards:

1. The capability and strength to carry the maximum allowed load and not exceed the manufacturer's gross vehicle weight rating (GVWR), gross axle weighting, or tire rating.

2. Structural integrity that mitigates or minimizes the adverse effects of collisions.
3. Federal Motor Vehicle Safety Standards (FMVSS), 49 C.F.R. Part 571

In addition to the above, every bus operated in this program shall be equipped as follows:

**Mirrors.** There shall be two exterior rear vision mirrors, one at each side. The mirrors shall be firmly attached to the outside of the bus and located as to reflect to the driver a view of the highway to the rear along both sides of the vehicle. All buses shall be equipped with an inside rear vision mirror capable of giving the driver a clear view of seated and standing passengers. Buses having a passenger exit door that is located inconveniently for the driver's visual control shall be equipped with additional interior mirrors to enable the driver to view the passenger exit door.

**Wiring and Batteries.** Electrical wiring shall be maintained so as not to come in contact with moving parts, heated surfaces, or be subject to chafing or abrasion which may cause insulation to become worn.

**Brake Interlock Systems.** All Type I buses having a rear exit door shall be equipped with a rear exit door/brake interlock that automatically applies the brake upon driver activation of the rear exit door to the open position. Brake interlock application shall remain activated until deactivated by the driver and the rear exit door returns to the closed position. The rear exit door brake interlock on such buses shall be equipped with an identified override switch enabling emergency release of the brake interlock function. The override switch shall not be located within reach of the seated driver. Air pressure application to the brake during brake interlock operation, on buses equipped with rear exit door/brake interlock, shall be regulated at the equipment's original manufacturer's specifications.

**Standee Line and Warning.** Every bus designed and constructed to allow standees shall be plainly marked with a line of contrasting color at least two inches wide, or be equipped with some other means to indicate that all passengers are prohibited from occupying a space forward of a perpendicular plane drawn through the rear of the driver's seat and perpendicular to the longitudinal axis of the bus. A sign shall be posted at or near the front of the bus stating that it is a violation for a bus to be operated with passengers occupying an area forward of the line.

**Flooring, Steps, and Thresholds.** Flooring, steps, and thresholds on all buses shall have slip resistant surfaces without protruding or sharp edges, lips, or overhangs, in order to prevent tripping hazards. All step edges and thresholds shall have a band of color(s) running



the full width of the step or edge which contrasts with the step tread and riser, either light-on-dark or dark-on-light.

**Doors.** Power activated doors on all buses shall be equipped with a manual device designed to release door closing pressure.

**Emergency Exits.** All buses shall have an emergency exit door or shall be provided with emergency escape push-out windows. There shall be a sufficient number of push-out or kick-out windows in each vehicle to provide a total escape area equivalent to 67 square inches per seat, including the driver's seat. No less than 40% of the total escape area shall be on one side of the vehicle. Emergency escape kick-out or push-out windows and emergency exit doors shall be conspicuously marked with a sign or light and shall always be kept in good working order so that they may be readily opened in an emergency. All such windows and doors shall not be obstructed, either inside or outside, so as to hinder escape. Buses equipped with an auxiliary door for emergency exit shall be equipped with an audible alarm and light indicating to the driver when a door is ajar or opened while the engine is running.

**Tires and Wheels.** Tires shall be properly inflated in accordance with manufacturer's recommendations.

(1) No bus shall be operated with a tread groove pattern depth:

a. Less than  $\frac{4}{32}$  ( $\frac{1}{8}$ ) of an inch, measured at any point on a major tread groove for tires on the steering axle of all buses. The measurements shall not be made where tie bars, humps, or fillets are located.

b. Less than  $\frac{2}{32}$  ( $\frac{1}{16}$ ) of an inch, measured at any point on a major tread groove for all other tires of all buses. The measurements shall not be made where tie bars, humps, or fillets are located.

(2) No bus shall be operated with recapped, regrooved, or retreaded tires on the steering axle.

(3) Wheels shall be visibly free from cracks and distortions and shall not have missing, cracked, or broken mounting lugs.

(4) Seat Belts. Every bus shall be equipped with an adjustable driver's restraining belt in compliance with the requirements of FMVSS 209, "Seat Belt Assemblies" 49 C.F.R. 571.209, Rev. 10/09, and FMVSS 210, "Seat Belt Assembly Anchorages" 49 C.F.R. 571.210, Rev. 10/09, hereby incorporated by reference.

(5) Safety Equipment. Every bus shall be equipped with one fully charged dry chemical or carbon dioxide fire extinguisher, having at least a 1A:BC rating. The fire extinguishers shall be maintained as follows:

a. Each fire extinguisher shall be securely mounted on the bus in a conspicuous place or in a clearly marked compartment and be readily accessible.

b. Each fire extinguisher shall be maintained in efficient operating condition and be equipped with some means of determining if it is fully charged.

(6) Persons with Disabilities. Buses used for the purpose of transporting individuals with disabilities shall meet the requirements set forth in 49 C.F.R. Part 38, Rev. 10/09 hereby incorporated by reference, as well as the following:

a. Installation of a wheelchair lift or ramp shall not cause the manufacturer's GVWR, gross axle weight rating, or tire rating to be exceeded.

b. Except in locations within 3 1/2 inches of the bus floor, all readily accessible exposed edges or other hazardous protrusions of parts of wheelchair lift assemblies or ramps that are located in the passenger compartment shall be padded with energy absorbing material to mitigate injury in normal use and in case of a collision. This requirement shall also apply to parts of the bus associated with the operation of the lift or ramp.

c. The controls for operating the lift shall be at a location where the bus driver or lift attendant has a full view, unobstructed by passengers, of the lift platform, its entrance and exit, and the wheelchair passenger, either directly or with partial assistance of mirrors. Lifts located entirely to the rear of the driver's seat shall not be operable from the driver's seat, but shall have an override control at the driver's position that can be activated to prevent the lift from being operated by the other controls (except for emergency manual operation upon power failure).

d. The installation of the wheelchair lift or ramp and its controls and the method of attachment in the bus body or chassis shall not diminish the structural integrity of the bus nor cause a hazardous imbalance of the bus. No part of the assembly, when installed and stowed, shall extend laterally beyond the normal side contour of the bus, nor vertically beyond the lowest part of the rim of the wheel closest to the lift.

e. Each wheelchair lift or ramp assembly shall be legibly and permanently marked by the manufacturer or installer with the following information:

1. The manufacturer's name and address.
2. The month and year of manufacture.
3. A certificate that the wheelchair lift or ramp securement devices, and their installation, conform to State of Florida requirements applicable to accessible buses.

**(7) Wheelchairs.** Wheelchair lifts, ramps, securement devices, and restraints shall be inspected and maintained as required by this rule chapter. Instructions for normal and emergency operation of the lift or ramp shall be carried or displayed in every bus.

## **Operational Standards and Policies**

Transitions is committed to providing and maintaining a safe and healthy workplace for all workers (including contractors and volunteers) as well as clients, visitors and members of the public. Hazards and risks to health and safety will be eliminated or minimized, as far as is reasonably practicable.

While the responsibility for managing health and safety ultimately rests with management, employees also have important responsibilities for health and safety in the workplace.

Management will:

- Eliminate or minimize all workplace hazards and risks as far as is reasonably practicable.
- Provide information, instruction, and training to enable all workers to work safely.
- Supervise workers to ensure work activities are performed safely.
- Consult with and involve workers on matters relating to health, safety and wellbeing.
- Provide appropriate safety equipment and personal protective equipment.

- Provide a suitable injury management and return to work program.
- Provide appropriate safety policies.

Employees will:

- Take reasonable care for their own health and safety.
- Follow safe work procedures, instructions and rules.
- Participate in safety training.
- Report health and safety hazards.
- Report all injuries and incidents.
- Use safety equipment and personal protective equipment as instructed.

The following policies have been instituted by Transitions:

- Wireless Communication Device Use Policy
- Backing Mitigation Policy
- Railroad Crossing Policy
- Bloodborne Pathogens Handling Policy
- Tire Inspection Policy

### Wireless Communication Device Policy

Transitions policy states that the use of a wireless communication device while driving is prohibited while the vehicle is in motion. This includes the use of a wireless communication device issued to the operator by Transitions. Transitions policy states that operators must pull off the road, put the vehicle in park, and turn the vehicle off before answering or making a call or text. The practice of using cell phones while operating vehicles has been known to cause accidents due to operator inattentiveness to the road. As a contractor and private business, we are in the business of carrying passengers. It is extremely dangerous and unprofessional to use a cell/wireless phone while operating a vehicle. As such, the following guidance is provided for appropriate use.

“Wireless communication device” means an electronic or electrical device capable of remote wireless communication. Examples include cell phones, personal digital assistants (PDAs) and portable computers (commonly called laptop computers). “Use of a wireless communication device” means use of a mobile telephone or other electronic or electrical device, hands-on or hands-free, to conduct an oral communication; to place or receive a telephone call; to send or read electronic mail or a text message; to play a game; to navigate the Internet; to play, view, or listen to a video; to play, view, or listen to a television broadcast; to play or listen to music; to execute a computational function, or to perform any other function that is not necessary for the health or safety of the person and that entails the risk of distracting the employee from a safety-critical task.

Use of an electronic or electrical device that enhances the individual’s physical ability to perform, such as a hearing aid, is not included in this definition.

Communication on a company issued device may take place while inside the vehicle, however, the driver is required to stop the vehicle at the first available and safe location to

respond. Tablets and any other wireless equipment provided to you by and for the use of Transitions vehicles are for navigation and information purposes only. Any person who downloads unauthorized programs on the tablets, office equipment or incurs charges will be subject to the preceding disciplinary action, punitive actions and potentially criminal charges.

Any supervisor observing a driver with a phone device to his/her ear will assume that the driver is talking on a cell/wireless phone. The use of ear buds, blue-tooth or headsets for the purpose of communicating on a cell phone or listening to musical devices will constitute a violation of this policy.

**Violations (At minimum, but may be escalated based on severity)**

FIRST OFFENSE:           Written Warning  
SECOND OFFENSE:       Written reprimand + 1-day suspension without pay  
THIRD OFFENSE:         Termination

All personal wireless communication devices must be turned off, with any earpieces removed from the operator's ear while occupying the driver's seat. Personal wireless communications device" means an electronic or electrical device that was not provided by Transitions for commuting purposes.

If you must use a wireless phone for communication for emergency personal use (voice), view emails or text message, you must **STOP** and **physically exit** your vehicle. You may not, however, make unauthorized stops for the explicit purpose of using your wireless phone for personal calls. Your first responsibility is to provide transit service.

**Vehicle Backing Mitigation Policy**

It is not acceptable to back a Transitions vehicle for any distance, for any reason other than in spots designated by management as necessary backing locations. There are many defensive driving options available to avoid backing and those should be utilized in lieu of performing a backing maneuver.

If a driver deems a location as unsuitable for any driving method other than backing, they must immediately contact their supervisor for review of the location and possible alternatives. Supervisors or managers will view the site and either provide alternatives or designate the area as an operational backing area of need which will be notated on the appropriate list.

**Controls**

Any backing deemed unnecessary, negligent, or willfully deceptive will be met with a final written warning and termination notice. Random reviews may be done to ensure compliance with this policy and do not require a specific incident or accident to instigate such activities.

## Railroad Crossings - Negotiating Procedures

Transitions requires that the driver of any motor vehicle carrying passengers for hire, before crossing any track or tracks of a railroad, shall engage flashers, shall stop the vehicle within 50 feet but not less than 15 feet from the nearest rails of such railroad and while stopped shall open the passenger side window or door and shall listen and look in both directions along the track for any approaching train and for signals indication the approach of a train and shall not proceed until he or she can do so safely.

Drivers witnessed not coming to a complete stop before proceeding over the tracks will be subject to disciplinary actions up to and including termination. Witnessing can be accomplished during routine onsite checks or through electronic devices.

## Tire Inspection Policy

Transitions Commute Solutions believes Safety for our drivers and staff is our #1 priority and one of the most important parts of safety, in transportation, is where the rubber meets the road. Tires are the connection of the vehicle to the ground and can be the key to avoiding unsafe driving conditions. Proper inflation and tread condition are the two key components of tire performance. Inflating and maintaining proper tire pressure ensures safer, more comfortable driving, and better fuel efficiency. Particularly in inclement weather conditions such as heavy rain, snow, or ice tire inflation and condition can make a major difference in driving safety.

Below are the basic steps for checking tire inflation and condition. These inspections should happen every time you prepare to drive any vehicle, including your own. Tires should be inspected before vehicle operation and immediately after coming in contact with any road debris. You must contact your supervisor or a member of the management team immediately if you feel that any or all the tires on your vehicle are unsafe.

Inspection Type	Frequency	Responsible	Documentation
Air Pressure Check	Weekly	Driver	Daily Inspection Log
Tire Condition Check	Daily	Driver	Daily Inspection Log
Vehicle Overview	Monthly	Transitions Mechanic	Vehicle Inspection Log
Vehicle Overview	Monthly	Supervisor / Manager	Monthly Vehicle Inspection Log

Note: If a tire “looks” under inflated it has gone below 5 PSI below recommended pressure and needs to be addressed immediately.

Please follow these steps in order to maintain proper tire inflation.

PSI is measured by the notches on a tire air pressure gauge or with a number reading on digital gauges. To find out what PSI is right for your tires, consult your tires first, then owner's manual or the sticker on the driver's side doorjamb if tire wall is worn and illegible.

Recommendations may vary, but you should never inflate the tires five (5) PSI more or

less than what is recommended. Under-inflating wears out the sides of the tire and is actually a driving hazard. Over-inflated tires will wear more quickly and are also dangerous because of the increased possibility of a blowout. If you are unsure about the PSI for your tires, or it is unclear or worn away on the side of your tires, ask your manager or mechanic who knows the PSI rating for that vehicle.

The most accurate PSI for your tires is the number listed on the side of the tire wall. All tires should all be inflated to the same PSI for safety, proper vehicle function, comfort, and fuel efficiency.

Step 1: Locate the correct tire pressure on the outside wall of the tire, the tire information placard (inside doorjamb of driver's side door) or in the owner's manual. Contact your supervisor if the numbers are unclear or if you are unsure what your tire pressure should be for the vehicle you are in for the day.

Step 2: Record the tire pressure of all tires on your daily inspection sheet.

Step 3: If the tire pressure is too high in any of the tires, slowly release air by gently pressing on the tire valve with the edge of your tire gauge until you get to the correct pressure. Be sure to do this slowly in order to not release too much air.

Step 4: If the tire pressure is too low, note the difference between the measured tire pressure and the correct tire pressure on your daily inspection sheet. These "missing" pounds of pressure are what you will need to add.

Step 5: If tire pressure is low by no more than 5 pounds drive to a local service station. If tire pressure is low by greater than 5 pounds, contact your supervisor for directions on how to proceed. At a service station, add the missing pounds of air pressure to each tire that is underinflated. Our tire vendors should add air for your tires at no charge.

Step 6: Check all the tires to make sure they have the same air pressure (except in cases in which the front and rear tires are supposed to have different amounts of pressure). If tire pressure is added by a service attendant please request the PSI of all four (4) tires and notate when and where the pressure was checked and adjusted, and pressure readings on your daily inspection sheet.

## Tread Depth Check

**IMPORTANT:** It is necessary to check all sections of the tire including side wall, tread from outside to inside, and valve stem for any inconsistencies. Any sign of uneven wear can be the result of additional maintenance concerns which should be relayed to management.

Tires have built-in tread wear indicators that let you know when it is time to replace your tires. These indicators are raised sections spaced intermittently in the bottom of the tread grooves. When they appear even with the outside of the tread, it is time to replace the tires. Please check with your supervisor if you are unsure where to locate this indicators.

You can also test your tread with a Lincoln penny. Simply turn the penny so Lincoln's head is pointing down and insert it into the tread. If the tread doesn't cover Lincoln's head, it's time to replace your tires.

## Unsafe Tread Conditions

If you see any of the following DO NOT operate the vehicle until you have spoken with a supervisor or member of management.

1. Tire tread has worn down to the radials (if anything other than rubber is visible)
2. Any part of the tire is bulging like a bubble
3. The valve stem is missing or damaged
4. Any foreign objects in the tire tread or sidewall

## Vehicle Maintenance Policy

The mission of Transitions is to provide safe, reliable, clean and well-maintained vehicles for the community they serve. The purpose of the maintenance plan is to provide a consistent, systematic program that will enable the maintenance department to properly maintain and service vehicles to meet or exceed the manufacturer's recommended maintenance schedule. These procedures are designed to achieve efficiency and reliability while keeping vehicle repairs and maintenance costs under control.

Vehicle inspection, maintenance and repair are key components to maintaining a safe working environment for our employees, providing safe transportation to our clients, and ensuring the proper return on dollars invested by the company or Local, State, or Federal sources. Keeping vehicles in a state of good repair has effects on our safety, efficiency, and our ability to respond to the needs of our clients. This puts our drivers in the unique position of aiding the company in keeping our fleet in proper working order through communication and proactive observance of potential issues.

An employee should never operate a vehicle they believe to have any maintenance issue and should immediately report warning lights, smells, or sounds that seem out of place or different from normal operating conditions. The standard chain of communication should be used in this instance and a decision should only be made by management (above the level but with the knowledge of the Lead Driver) whether that vehicle is safe to operate or requires further inquiry by certified maintenance professionals.

Preventative maintenance (PM) inspections and services should follow the minimum required by the manufacturers, supplier, or builder. If preventative maintenance services are not being done according to the guidelines of the manufacturer, supplier or builder it may jeopardize any claim to a warranty. All issues with vehicles within the manufacturer warranty period should be referred to the local dealer for that manufacturer for repairs. Warranty details for each unit will be maintained in the local offices.

### Maintenance Plan Goals

It is the goal of the Transitions to operate at a higher industry standard by managing an effective preventative maintenance program and ensuring the proper management of parts, equipment and fleet. The maintenance department strives to maximize the number of vehicles in service each day and ensure that defects are reported and addressed.

The maintenance department manages an effective preventative maintenance program by consistently analyzing vehicle data, such as: noted defects on post trip defect cards, component failures, preventive maintenance inspections,



repair orders, and in-service failures.

Maintenance trends that are identified through this process are addressed by initiating scheduled replacements and additional component inspections.

## Measurable Goals

### Road Calls

It is the goal of the maintenance department to reduce road calls by ensuring that vehicles are in proper mechanical order. The total revenue mileage is divided into each of these categories separately to calculate the distance between failures. A monthly report is generated and compared to all previous road call reports. The goal is to increase distance between road calls of fixed route vehicles to 7,000 miles, demand response to 18,000 miles. Once these goals are attained the mileages will be increased for continual improvement in vehicle reliability.

The Operations Manager analyzes all road calls as they occur and determines if the road call was preventable. This is accomplished by dividing the road calls into subsystems to determine the root cause of the failures. The preventive maintenance program is consistently monitored for effectiveness and adjustments are made as necessary to prevent repeat failures.

### Preventive Maintenance Interval Monitoring

It is the goal of the Company to complete all preventive maintenance inspections within 10% of the scheduled mileage, or 600 miles, whichever is greater. The inspections will not be fewer than 80% within this range for any one-month period. This maintenance activity is intended to prevent failures and is consistently monitored for its effectiveness by the percentage of on-time inspections and the number of road calls resulting in unscheduled maintenance.

The Operations Manager generates an "Inspections Due" report weekly using computer software and schedules the buses to remain out of service until the inspection is completed. All inspections must be within desired mileage parameters. If at any time the goal falls below 80% of on-time for the inspections during the month, the root cause of the deficiency will be determined, and adjustments will be made to the maintenance program to prevent future shortfalls.

With the fast-changing nature of the COVID-19 pandemic, there may be delays or impacts to the PM maintenance schedule. These delays may occur due to service vendors experiencing staff shortages as a result of COVID-19. Transitions will take steps to mitigate delays to service on the vehicles by identifying additional vendors when possible.

## Scheduled vs. Unscheduled Maintenance

The Operations Manager defines scheduled maintenance as repairs made due to defects identified during all types of preventive maintenance inspections and unscheduled maintenance as repairs made to equipment due to unexpected failures. It is the goal of the maintenance department to decrease unscheduled maintenance to 20% of all repairs.

The Operations Manager enters all maintenance activities into Fleetio program as either scheduled or unscheduled. Reports are generated monthly and an analysis is made to determine the percentages of each category. If not within the predetermined maintenance goal, the root cause is determined for the unbalanced maintenance activities. The Operations Manager analyzes how many repeat failures occur, mechanic skill level, age of fleet, miles per vehicle, adherence to the preventive maintenance schedule, and overall effectiveness of the preventive maintenance program.

## Spare Ratio

It is the goal of the maintenance department to maintain the required number of vehicles for all operating hours. A spare ratio of 10% will be maintained to accomplish this goal. This will allow a sufficient number of spare buses to substitute for vehicles undergoing regular maintenance or for vehicles that have broken down during the day.

The Operations Manager monitors the ability of the maintenance department to produce quality repairs in a timely manner to have the buses available for peak pull out. The goal of 10% spare ratio includes a spreadsheet listing for each bus type, the number of buses, and for each year the number of buses to be disposed of. The sheet also includes the number of buses to be added, the projected peak requirement, and the projected spare ratio. The plan also includes detailed justifications for time in which spare ratios exceed 10%.

## Fleet Summary

A physical inventory of equipment is kept on file and updated annually. The property number, year of manufacture, type of vehicle, vehicle identification, ADA information, total mileage, and mileage operated annually can be found on the list. The Vehicle Fleet Inventory is listed below.

AMENDED EXHIBIT "A"					
Vehicle #	Year	Type	FDOT #	VIN #	TAG #
1519	2020	Ford F350 Transit Van	75324	1FDVU4X89LKA26744	TI2452
1520	2020	Ford F350 Transit Van	75323	1FDVU4X89LKA26751	TI2451
1515	2016	Chevrolet Glaval bus	N/A	1GB6GUBGXG1141772	TB1283
1514	2016	Chevrolet Glaval bus	N/A	1GB6GUBG3G1138678	140174
1513	2016	Chevrolet Glaval bus	N/A	1GB6GUBG7H1183544	231722
1512	2017	Chevrolet Glaval bus	N/A	1GB6GUBG5H1183901	239540
1511	2018	Chevrolet Glaval bus	N/A	1HA6GUBG6JN003332	TB3248
1524	2016	Freightliner	70100	4UZADRDU4FCGX5494	TG5330
1525	2015	Freightliner	98160	4UZADRDU4FCGR9427	TG5331
1532	2019	Chevrolet Glaval bus	10047	1HA6GUBG2JN009869	TBD
1534	2019	Chevrolet Glaval bus	10046	1HA6GUBGXJN009893	TBD
TBD	2019	Ford E450 Challenger Cutaway	10083	1FDFE4FS9KDC56589	TBD
TBD	2019	Ford E450 Cutaway	10082	1FDFE4FS7KDC56588	TBD
TBD	2016	Dodge Grand Caravan	98137	2C7WDGBG8GR195513	TBD
TBD	2016	Dodge Grand Caravan	98138	2C7WDGBG8GR202928	TBD
TBD	2015	Dodge Grand Caravan	97178	2C7WDGBG4FR650288	TBD
TBD	2015	Dodge Grand Caravan	97195	2C7WDGBG3FR652145	TBD
TBD	2016	Dodge Grand Caravan	98172	2C7WDGBG4GR385339	TBD

## Vehicle History File

Each vehicle has a written record documenting preventive maintenance, regular maintenance, inspections, lubrication and repairs performed. Such records will be maintained for the life of the vehicle and include at a minimum the following information:

- Identification of the vehicle, including make, model, license number or other means of positive identification and ownership
- Date, mileage, and description of each inspection, maintenance, repair or lubrication performed
- If not owned by the transit agency, the name of the person or company furnishing service with this vehicle
- The name and address of any business firm performing a maintenance repair
- Listing of repair order number for all repairs made
- Oil sample results
- Warranty information

## Fleet Maintenance

The maintenance department strives to complete 80% of vehicle repairs as scheduled maintenance repairs. The maintenance department identifies scheduled maintenance repairs as repairs made due to defects identified during all types of preventive maintenance inspections. Scheduled maintenance allows for time, materials, tools, equipment, and labor to be managed easier than having unpredictable maintenance costs, workloads, and vehicle downtime. Unscheduled maintenance is defined as repairs made to equipment due to unexpected failures.

## Preventative Maintenance

Preventative maintenance is described as periodic, prescribed inspections and/or

servicing of equipment accomplished on a calendar, mileage, or hours of operation basis. The mileages are taken from the daily manifests sheets that the drivers produce daily.

Written guidelines are used to assist with conducting preventative maintenance inspections. These guidelines are accessible to all maintenance technicians. The maintenance shop uses guidelines that appear in the FDOT Preventative Maintenance Standards Manual to assist with inspecting paratransit vehicles.

When a vehicle is due for an inspection it is taken out of service until the inspection is completed and the necessary repairs have been made. Maintenance technicians use an inspection checklist when conducting preventative maintenance inspections. Attached to each preventive maintenance checklist is a defect sheet. Defects noted during the inspection are marked on the defect sheet. As each defect is repaired, it is marked completed on the sheet. If repairs overlap work shifts, the next technician working on the repairs uses the defect sheet to determine which repairs have been made and which repairs are still outstanding. The defect sheet is discarded after the completion of all necessary repairs that were made during the inspection. The technician performing the inspection signs all inspection checklists and repairs are entered into the Fleetio program.

### Minimum Preventative Maintenance Expectations

PM services can be grouped into different levels, most used are A, B, and C.

**Level A** – Conducted at 6,000 (or according to manufacturer recommendations) mile intervals. Change engine oil and filter, lubricate all fittings, check all fluid levels, check lights, check wipers, check tires and tire pressure, check belt/hoses, brakes, fire extinguishers, etc.

**Level B** – Conducted at 12,000-mile intervals. Includes all items in Level A, plus transmission fluid and filter change, check coolant.

**Level C** – Conducted at 48,000-mile intervals. All items in Level A and B, plus fuel filter, perform complete engine tune-up, test engine compression, replace air filter.

**Please see Preventative Maintenance Levels table below:**

**Preventative Maintenance (PM) Levels**

PM Level	Cumulative Mileage	PM Description
A	6,000 Intervals	A
B	12,000 Intervals	B
C	48,000 Intervals	C

Once 48,000 miles has been exceeded on the odometer the above schedule should be repeated until the unit is sold or returned to the issuing Government entity. Above this mileage all team members should take extra care in completing the necessary inspections as the vehicle has passed the 48,000-mile threshold which is then considered a state of "high mileage".

### Manufacturer Warranty Work Expectations

A warranty is an assurance from a manufacturer that a product will perform properly for a specified time or usage level. Warranties cover new vehicles, new or replacement parts, and most vendors work. If the product fails to meet this assurance, the manufacturer is obligated to make restitution. Restitution may be replacement or repair of the defective product, or reimbursement to the owner for the cost of the repair or replacement. Warranties may be formal written policies or implied warranties by manufactures or maintenance vendors.

Vendors or manufacturers provide warranty information at the time of delivery of new vehicle. Sub-recipients should maintain copy of warranty details in the corresponding vehicle file in the local office.

### Component Inspection

During each preventative maintenance inspection, technicians perform additional A/C checks by utilizing a separate HVAC inspection checklist form. This form is attached to the preventative maintenance checklist form and filed in the vehicle history files when completed.

A complete cycle of the lift is performed during the operator's pre-trip inspection each day. The operators report, by the most immediate means available, any lift failures. The lifts are also serviced on preventative maintenance inspections every 36,000 miles. Instructions for normal and emergency operations of the lift or ramp are carried or displayed in every accessible vehicle.

### Wear Tolerance

A wear tolerance policy is in place for tire and brake replacements. Front tires must be replaced when the tread depth reaches 4/32 and rear tires must be replaced when the tread depth reaches 2/32 inches. Brakes must be replaced when the shoes reach the wear line on the brake block.

Wear tolerance determinations are required to have two staff signatures to ensure accuracy.

## Long-term Maintenance

Outsourcing is utilized for services that require tools and diagnostic equipment not available to the maintenance department. The repairs that are regularly outsourced include transmission repairs, re-lining brake shoes, body repair and painting. Local garages are utilized for these types of repairs.

## Pre-trip/Post-trip Inspections

Pre-trip inspections are conducted each morning before the vehicle begins revenue service. The inspection checklist remains on the vehicle during the day. If a relief driver uses the vehicle during service, the new driver performs a walk around inspection of the bus and records any damage on the inspection checklist. At the end of the day, a post-trip inspection is conducted, and the checklist is placed in a drop box attached to the operations office. The operations manager is assigned to retrieve and review the forms.

### Pre-Trip Inspection

The pre-trip inspection ensures the following parts and devices are in safe condition and in good working order at the beginning of the trip:

- Service brakes
- Parking brakes
- Tires and wheels
- Steering
- Horn
- Lighting devices
- Windshield wipers
- Rear vision mirrors
- Passenger doors
- Exhaust systems
- Equipment for transporting wheelchairs
- Safety, security, and emergency equipment

If defects are noted during the pre-trip inspection they are repaired when reported. Any outstanding repairs are held for the morning crew. The Operations Manager has the discretion to defer a non-safety related repair if the bus is needed to complete service requirements. The repair must be scheduled.

It is imperative to maintain a vigilance in the process of inspecting all vehicles since road hazards or defects as well as normal wear and tear can cause any number of issues that will impede the safety of the driver and our clients. Drivers should follow the process outlined below each day prior to beginning the route for the day:

Once fluids and tire pressure has been checked it is expected that a vehicle be started and allowed to run for several minutes before pulling out of the yard. This ensures no unseen safety concerns can be heard before the vehicle is placed into gear. Also, during this time the driver should be check the lighting system for full functionality.

**ALL INCIDENTS THAT OCCUR DURING OPERATIONS OF THE VEHICLE WHICH MAY CAUSE A SAFETY OR FUNCTIONAL CONCERN FOR THE VEHICLE NEED TO BE REPORTED TO MANAGEMENT IMMEDIATELY.**

## Road Calls

A road call is defined as unscheduled maintenance requiring an emergency repair or service of a piece of equipment either in the field or after being towed to the maintenance facility. When failures occur they are radioed into the Operations Manager who will swap out the bus with a spare bus. If the bus is drivable and safe, the manager will return the bus to the garage. In the case the bus cannot be driven at the site of the failure, a towing service is called.

A road call form is completed, documenting the date, unit ID, mileage and time of the road call, as well as a brief description of the failure. The manager will list the information in a Work Order in the Fleetio program.

When a failure occurs, the Operations Manager investigates the incident to determine the root cause of the failure and whether the failure could have been prevented. This process involves reviewing recent repairs, preventive maintenance inspections, and recent drivers defect reports as well as prior road calls. Once the cause is determined, corrective actions are taken as necessary to prevent future failures. It is the goal of the maintenance department to continually increase the distance between failures through analyzing all failures and revising the preventative maintenance program as needed.

## Cleaning

During pre-trip inspections, it is the responsibility of the driver to perform a walkthrough on the vehicle and ensure that any debris on the flooring or step wells that could result any falls or slips. Any unsafe conditions are corrected before any scheduled trips.

The driver reports all graffiti/etchings, gum, spills, or any other issues in the interior that would warrant extra material and labor from normal clean-up, on their post-trip report.

The interior of the buses is wiped down, swept and mopped nightly. The exterior of the buses is cleaned hand washing with long handled brushes. The wash and detail vendor will complete this weekly.

## Information Management

Transitions uses the Fleetio software program to monitor asset management, maintenance scheduling, labor management, work order management, cost tracking, parts inventory management, and purchasing.

The Operations Manager is responsible for regularly monitoring and analyzing maintenance data to identify trends, repeat repairs and make adjustments to the preventative maintenance program based on this information. The Operations Manager begins each workday by reviewing the previous day's inspection forms to determine whether any of the repairs could have been prevented. The preventative maintenance program is adjusted as needed based on these determinations.

## Material Handling

The maintenance department provides their employees with instructions on safe handling, first aid treatment, emergency procedures, and proper clean up procedures of chemicals in the workplace. Knowing the potential flammability, explosion, and reactivity of chemicals in the workplace are the rights of the employees under the Right-To-Know-Law.

An emergency spill containment program is in place. The spill kit includes absorbing pads and disposal bags that are collected by an outsourced oil disposal contracted company. An outsourced contractor also disposes of waste oils, filters, and other 'Controlled Waste'.



## Maintenance Responsibilities

The Operations Manager is responsible for the timely completion of all maintenance and repair work. These responsibilities include:

- Establishing and monitoring the daily, weekly and monthly vehicle inspection program for the office.
- Ensuring that any driver or mechanic scheduled or required to driver a vehicle with a seating capacity of more than fifteen (15) passengers has an active CDL license.
- Ensuring staff are made aware of the policies and procedures relating to the proper expectation and awareness of vehicle maintenance standards.
- Recording, at minimum, annual training to each employee relating to the policy.
- Maintaining records indicating signature of receipt of policy by employee.
- Maintaining all forms and records required for vehicle inspection and maintenance.
- Acting as the point of contact for the local vendor staff.
- Maintaining a vehicle fleet inventory list and ensuring vehicles are inspected at a minimum of once annually.
- Overseeing records maintenance for audit compliance, including monthly reporting requirements.
- Approving all worked performed on vehicles and ensure compliance of chosen vendor with all FTA standards.
- Maintaining all up-to-date maintenance information in a Transitions approved database and stored in a vehicle folder in the local office.

Drivers responsibilities include:

- Completing a pre- and post-inspection of the vehicle per company guidelines and completing all required paperwork to ensure working order and safety of the vehicle before commencing with the daily route and after completion of all driving activities.
- Reporting any safety concerns immediately to the manager on duty before starting the route.
- Inspecting all components of the vehicle per the inspection sheets to ensure proper, safe working order, to include but not limited to the wheelchair lift, lights, oil levels, and braking systems.

## Inspection Policy

Transitions mandates daily pre- and post-trip, body, and wheelchair inspections as well as an annual inspection and audit of each vehicle. Inspection forms are stored in the local office.

# Pre-Trip Inspection Form

## Pre-Trip Inspection Form

Date: \_\_\_\_\_

Vehicle No.: \_\_\_\_\_

Mileage: \_\_\_\_\_

Inspect and ✓ OK Or Problem  
Make Notes to clarify the problem(s)

OK	Problem	Engine
<input type="checkbox"/>	<input type="checkbox"/>	Oil Level
<input type="checkbox"/>	<input type="checkbox"/>	Radiator Level
<input type="checkbox"/>	<input type="checkbox"/>	Windshield
<input type="checkbox"/>	<input type="checkbox"/>	Battery
<input type="checkbox"/>	<input type="checkbox"/>	Hoses/Belts
<input type="checkbox"/>	<input type="checkbox"/>	Coolant Leaks

OK	Problem	Safety Equipment
<input type="checkbox"/>	<input type="checkbox"/>	Accident Kit
<input type="checkbox"/>	<input type="checkbox"/>	Fire Ext
<input type="checkbox"/>	<input type="checkbox"/>	Flares/Triangle
<input type="checkbox"/>	<input type="checkbox"/>	Emergency Kits
<input type="checkbox"/>	<input type="checkbox"/>	Door Alarms (2)
<input type="checkbox"/>	<input type="checkbox"/>	Seatbelt Cutter
<input type="checkbox"/>	<input type="checkbox"/>	Back-up Alarm
<input type="checkbox"/>	<input type="checkbox"/>	Rear Door Buzzer

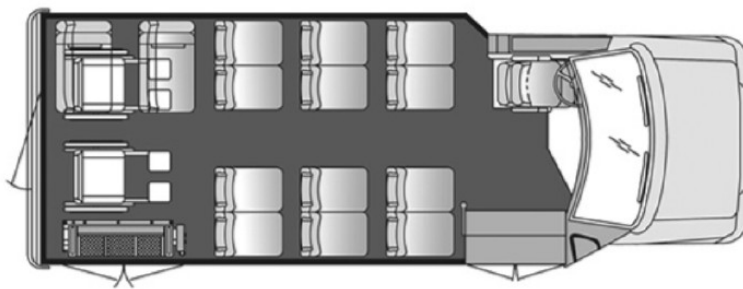
OK	Problem	Exterior
<input type="checkbox"/>	<input type="checkbox"/>	Tires
<input type="checkbox"/>	<input type="checkbox"/>	Turn Signals
<input type="checkbox"/>	<input type="checkbox"/>	Headlights
<input type="checkbox"/>	<input type="checkbox"/>	Tail/Break Lights
<input type="checkbox"/>	<input type="checkbox"/>	Marker Lights
<input type="checkbox"/>	<input type="checkbox"/>	Windshield/Wipers
<input type="checkbox"/>	<input type="checkbox"/>	Body Damage
<input type="checkbox"/>	<input type="checkbox"/>	Mirrors
<input type="checkbox"/>	<input type="checkbox"/>	Doors
<input type="checkbox"/>	<input type="checkbox"/>	Clean Exterior

OK	Problem	Wheelchair Lift
<input type="checkbox"/>	<input type="checkbox"/>	Cycle Lift
<input type="checkbox"/>	<input type="checkbox"/>	Lift Mechanism
<input type="checkbox"/>	<input type="checkbox"/>	Lift Belt & Safety Plate
<input type="checkbox"/>	<input type="checkbox"/>	Manual Lift
<input type="checkbox"/>	<input type="checkbox"/>	Belts & Extensions
<input type="checkbox"/>	<input type="checkbox"/>	Floor Securement
<input type="checkbox"/>	<input type="checkbox"/>	Trans. Interlock

Ok	Problem	Other
<input type="checkbox"/>	<input type="checkbox"/>	Gas Card

OK	Problem	Exterior
<input type="checkbox"/>	<input type="checkbox"/>	Brakes/Parking Brake
<input type="checkbox"/>	<input type="checkbox"/>	Steering
<input type="checkbox"/>	<input type="checkbox"/>	Transmission
<input type="checkbox"/>	<input type="checkbox"/>	Mirrors
<input type="checkbox"/>	<input type="checkbox"/>	Gauges
<input type="checkbox"/>	<input type="checkbox"/>	Clean Interior
<input type="checkbox"/>	<input type="checkbox"/>	Heater/AC
<input type="checkbox"/>	<input type="checkbox"/>	Radio
<input type="checkbox"/>	<input type="checkbox"/>	Horn
<input type="checkbox"/>	<input type="checkbox"/>	Interior Lights
<input type="checkbox"/>	<input type="checkbox"/>	Emergency Exit

Place an X to Indicate Body Damage



Notes:

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Driver Signature: \_\_\_\_\_

# Post-Trip Inspection Form

## Post-Trip Inspection Form

Date: \_\_\_\_\_

Vehicle No.: \_\_\_\_\_

Mileage: \_\_\_\_\_

Inspect and ✓ OK or Attention/Repair Needed (A/RN)  
Use Note section to clarify issues.

<b>OK</b>	<b>A/RN</b>	<b>Body Damage:</b>
<input type="checkbox"/>	<input type="checkbox"/>	Front
<input type="checkbox"/>	<input type="checkbox"/>	Driver
<input type="checkbox"/>	<input type="checkbox"/>	Rear
<input type="checkbox"/>	<input type="checkbox"/>	Doors

<b>OK</b>	<b>A/RN</b>	<b>Engine</b>
<input type="checkbox"/>	<input type="checkbox"/>	Belts
<input type="checkbox"/>	<input type="checkbox"/>	Hoses
<input type="checkbox"/>	<input type="checkbox"/>	Radiator
<input type="checkbox"/>	<input type="checkbox"/>	Transmission

<b>OK</b>	<b>A/RN</b>	<b>Tires</b>
<input type="checkbox"/>	<input type="checkbox"/>	Pressure
<input type="checkbox"/>	<input type="checkbox"/>	Tread
<input type="checkbox"/>	<input type="checkbox"/>	Wear
<input type="checkbox"/>	<input type="checkbox"/>	Rim

<b>OK</b>	<b>A/RN</b>	<b>Brakes</b>
<input type="checkbox"/>	<input type="checkbox"/>	Pull
<input type="checkbox"/>	<input type="checkbox"/>	Play
<input type="checkbox"/>	<input type="checkbox"/>	Vibration
<input type="checkbox"/>	<input type="checkbox"/>	Noise

<b>OK</b>	<b>A/RN</b>	<b>Fluids</b>
<input type="checkbox"/>	<input type="checkbox"/>	Oil
<input type="checkbox"/>	<input type="checkbox"/>	Water
<input type="checkbox"/>	<input type="checkbox"/>	Steering
<input type="checkbox"/>	<input type="checkbox"/>	Windshield
<input type="checkbox"/>	<input type="checkbox"/>	Transmission

<b>OK</b>	<b>A/RN</b>	<b>WC Lift</b>
<input type="checkbox"/>	<input type="checkbox"/>	Access Door
<input type="checkbox"/>	<input type="checkbox"/>	Hydraulic Fluids
<input type="checkbox"/>	<input type="checkbox"/>	Electrical Controls
<input type="checkbox"/>	<input type="checkbox"/>	Lift Operation
<input type="checkbox"/>	<input type="checkbox"/>	Floor Securement
<input type="checkbox"/>	<input type="checkbox"/>	Manual Lift

<b>OK</b>	<b>A/RN</b>	<b>Systems</b>
<input type="checkbox"/>	<input type="checkbox"/>	Driver Fan
<input type="checkbox"/>	<input type="checkbox"/>	Fan Switch
<input type="checkbox"/>	<input type="checkbox"/>	Turn Signals
<input type="checkbox"/>	<input type="checkbox"/>	Flashers
<input type="checkbox"/>	<input type="checkbox"/>	Horn
<input type="checkbox"/>	<input type="checkbox"/>	Heating/AC
<input type="checkbox"/>	<input type="checkbox"/>	Seat Belts

<b>OK</b>	<b>A/RN</b>	<b>Other</b>
<input type="checkbox"/>	<input type="checkbox"/>	Gas Card
<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	

Notes:

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<b>OK</b>	<b>A/RN</b>	<b>Steering</b>
<input type="checkbox"/>	<input type="checkbox"/>	Pull
<input type="checkbox"/>	<input type="checkbox"/>	Play
<input type="checkbox"/>	<input type="checkbox"/>	Vibration

<b>OK</b>	<b>A/RN</b>	<b>Lights</b>
<input type="checkbox"/>	<input type="checkbox"/>	Exterior
<input type="checkbox"/>	<input type="checkbox"/>	Interior
<input type="checkbox"/>	<input type="checkbox"/>	Low Beam
<input type="checkbox"/>	<input type="checkbox"/>	High Beam

Driver Signature: \_\_\_\_\_

# Annual Vehicle Inspection Form

## ANNUAL SAFETY INSPECTION REPORT

Vehicle #: \_\_\_\_\_ Tag #: \_\_\_\_\_ Mileage: \_\_\_\_\_ Date: \_\_\_\_\_

BODY EXTERIOR	Needs			
	OK	Attn	Unsafe	
				Check for body or fender damage.
				Check all Windows.
				Check side-view mirrors.
				Check attached body parts for looseness.
				Check windshield wiper blades.

TIRES	Needs			
	OK	Attn	Unsafe	
				Check tire wear.
				Check for nails, glass, etc.
				Check for tread separation.
				Check air pressure.
				Check lug nuts for tightness.

UNDER HOOD	Needs			
	OK	Attn	Unsafe	
				Pressure test cooling system.
				Check coolant/antifreeze level.
				Check cooling system circulation.
				Check brake fluid level.
				Check power steering fluid level.
				Check battery and cables.
				Check starting and charging system.
				Check windshield washer fluid.
				Check transmission fluid.

ENGINE	Needs			
	OK	Attn	Unsafe	
				Check all fuel lines for leaks.
				Check belts for looseness or signs of wear.
				Check all hoses for leaks or signs of wear.
				Check for loose wiring.
				Check air filter - clean.
				Check accelerator linkage.
				Check oil filter.

UNDERCARRIAGE	Needs			
	OK	Attn	Unsafe	
				Check fuel tank lines for leaks.
				Check differential for leaks.
				Check rear springs, shackles, and shocks.
				Check driveshaft center support and U-joint.
				Check front suspension and shocks.
				Check steering linkage.
				Check exhaust system.

BRAKES	Needs			
	OK	Attn	Unsafe	
				Check shoes and pads for lining wear.
				Check brake lines for leaks.
				Check brake vacuum hoses.
				Check brake adjustments.
				Check brake pedal clearance.
				Check emergency brake.

CONTROL PANEL	Needs			
	OK	Attn	Unsafe	
				Check warning lights and buzzers.
				Check dash lights.
				Check interior lighting.
				Check gauges.
				Check headlamps and remaining lights.
				Check license plate light.
				Check dimmer switch.
				Check emergency flashers.
				Check reverse lights.
				Check horn.
				Check windshield wiper operation.

ACCESSORIES	Needs			
	OK	Attn	Unsafe	
				Check heater output.
				Check air conditioner output.

BODY INTERIOR	Needs			
	OK	Attn	Unsafe	
				Check first aid kit.
				Check fire extinguisher.
				Check seats/floors for tears and looseness.
				Check floors for loose wheelchair tracks.
				Check fare box bracket for looseness.
				Check emergency exit.
				Check window operation.
				Check rearview mirror.
				Check for loose body belts.

### RECOMMENDATIONS:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

- Schedule recommended work immediately.
- Schedule recommended work in the near future.

Inspector's Signature: \_\_\_\_\_

## Body Maintenance, Care and Inspection

### 6,000 Miles (Body Inspection/Lubrication)

- Check all exterior caulk seams on body for weather induced damage. Cracks are typical and must be properly maintained to prevent water damage. If cracking or separation appears, cut out affected area and re-caulk with a good quality, all- weather caulk.
- Check door panel alignment on all doors
- Check all door seals for war and damage.
- Check exit door lower pins for damage and binding (first 5,000 miles, every 9,000 thereafter)
- Lubricate windshield wiper arm pivot points.
- Lubricate windshield wiper post pivot points.

### 12,000 Miles (Body Inspection/Lubrication)

- Wash vehicle, hose off underbody, fender wells where dirt, mud, etc. accumulate.
- Check all exterior caulk seams on body for weather induced damage. Cracks are typical and must be properly maintained to prevent water damage. If cracking or separation appears, cut out affected area and re-caulk with a good quality, all- weather caulk.
- Check door panel alignment on all doors
- Check all door seals for war and damage.
- Check exit door lower pins for damage and binding (first 3,000 miles, every 9,000 thereafter)
- Lubricate windshield wiper arm pivot points.
- Lubricate windshield wiper post pivot points.

## Bus Operator Selection, Qualification & Training

Transitions management is responsible for ensuring that the following minimum standards are met when hiring new drivers:

- Must possess a valid Class E Florida driving license
- Criminal background check (with local law enforcement and the Florida Department of Law Enforcement) and driving records check including, but not limited to, the following items:
  - Driving records
  - Instant Social Security Number validations
  - Instant identification of applicant's county of residence for the past seven years
  - County felony criminal history checks for up to three counties

- per applicant and other criminal records check
  - Employment reference checks
  - Personal reference checks
  - Workers' Compensation claims
- Complete employment application.
- Successful completion of pre-employment physical including an eye examination and drug screening test
- Signed acknowledgement of receipt and agreement to comply with drug-free workplace policy
- Signed acknowledgment of receipt and agreement to comply with SMS
- Successful completion of required orientation, training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised
- Signed acknowledgment of receipt and compliance with the following written operational and safety procedures **before** driving on a street or highway unsupervised:
  - Communication and handling of unsafe conditions, security threats, and emergencies.
  - Familiarization and operation of safety and emergency equipment, wheelchair lift equipment, and restraining devices
  - Application and compliance with all applicable federal and state laws, rules and regulations
  - Communications- Cellular and electronic devices policy
  - Drug free workplace Policy
- Drivers are required to write and submit a daily bus inspection report pursuant to Rule 14-90.006, F.A.C.
- Personnel licensed and authorized by the bus transit system to drive, move, or road test a bus in order to perform repairs or maintenance services when it has been determined that such temporary operation does not create unsafe operating conditions or create a hazard to public safety are not bound to the following two provisions:
  - Training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised.
  - Bus transit systems shall provide written operational and safety procedures to all bus drivers before driving on streets or highways unsupervised.

Noncompliance with any regulatory or agency specific requirement may result in an employee administrative action up to and including termination of employment. It is the policy of Transitions to screen applicants to eliminate those that pose a safety or security threat to the agency or who would not be capable of carrying out agency safety and security policies.

All employees and drivers of Transitions are required to complete all training and testing requirements to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised. A Certified Trainer is responsible for conducting and documenting all training and testing activities utilizing a certification process.

Noncompliance with any regulatory or agency specific guideline or requirement may result in suspension or termination of employment. This section of the SMS discusses the training and testing programs to be administered by Human resources or the Training Department.

### Initial Driver Training and Testing

Upon hire and prior to being placed into road service, all drivers are required to complete training and testing in the following areas:

- Bus transit system safety and operational policies and procedures
- Operational bus and equipment inspections
- Bus equipment familiarization
- Cell phone procedures
- Basic operations and maneuvering
- Boarding and alighting passengers
- Operation of wheelchair lift and other special equipment
- Defensive driving
- Passenger assistance and securement
- Handling of emergencies and security threats
- Security and threat awareness
- Driving conditions
- Use of electronic devices, consistent with Transition's Electronic Device Policy
- Blood borne pathogens and other occupational exposure to health hazards
- Substance abuse policy

In addition, new drivers are required to successfully undergo a road test with an experienced driver. A new-hire check-off list must be completed to ensure the employee has received all required training and information before released to revenue service.

After successful completion of each training and testing module, Transitions is required to document the satisfactory completion of each of their employee's training and maintain the training records. Certificates of completion issued are to be maintained in the driver files for a minimum of 4 years.

All newly hired employees are also provided instructional training in the following areas:

- General rules: General rules of the agency including employee conduct codes
- Customer service: Covers expectations of employees when dealing with the public; includes instruction on how and to whom to report security incidents, and types of individuals or situations to be aware of and report
- Fare handling: Covers fare collection procedures and provides instruction in dealing with fare disputes, conflict resolution, and notification of security personnel

## **Driver Safety Training and Testing**

Transitions has developed and maintains an Operator Development Training Program that may be used for new hire training and testing of employees.

This manual provides extensive coverage of all areas noted above.

- On-Going/Refresher Training and Testing
- On-Going/Refresher training and testing sessions will be conducted a minimum of every year. The drivers are required to attend training and testing in all areas specified by Rule 14-90, at least once every two years
- All training and testing activities are to be recorded and retained in files for a minimum of four years

## **Remedial Training and Testing**

Transitions requires remedial training for drivers who have been involved in a Preventable accident or have developed unsafe driving behaviour or other driving problems. Other causes for remedial training may include persistent customer complaints, poor customer service, supervisor recommendations, or a result of ongoing evaluations. Depending on the circumstances, trained personnel will determine the appropriate remedial training and testing, the results of which will also be documented and retained in files.

## **NIMS Training**

The National Incident Management System (NIMS) provides a consistent nationwide template to enable all government, private-sector, and



nongovernmental organizations to work together during domestic incidents (<http://www.fema.gov/emergency/nims/>). The NIMS system requires that transit agencies comply with a number of specific activities to ensure personnel who will be conducting activities in response to emergencies use the standard Incident Command System (ICS).

Transitions SPP requires that some management staff take available NIMS training to understand this requirement and to coordinate regularly with outside organizations to prepare for coordinated responses to incidents.

## **Medical Exams for Bus Transit System Drivers**

This section of the SSPP establishes the medical examination qualification standards for use by Transition. Transitions is adopting the FDOT medical examination qualification standards, consistent with Section 14-90.0041, FAC.

Medical examination requirements include a pre-employment examination for applicants, an examination at least once every two years for existing drivers, and a return to duty examination for any driver prior to returning to duty after having been off duty for 90 or more days due to an illness, medical condition, or injury.

- Medical examinations will be performed and recorded according to FDOT Form Number 725-030-11, Medical Examination Report for Bus Transit System Driver
- Medical examinations will be performed by a Doctor of Medicine or Osteopathy, Physician Assistant, or Advanced Registered Nurse Practitioner licensed or certified by the State of Florida. If medical examinations are performed by a Physician Assistant or Advanced Registered Nurse Practitioner, they must be performed under the supervision or review of a Doctor of Medicine or Osteopathy
- An ophthalmologist or optometrist licensed by the State of Florida may perform as much of the medical examination as it pertains to visual acuity, field of vision, and color recognition
- Upon completion of the medical examination, the examiner shall complete, sign, and date the medical examination form and maintain the original at his or her office
- Upon completion of the medical examination, the examiner shall complete, sign, and date the medical examination certificate and provide a copy
- Upon completion of the medical examination the driver shall provide their driver license number, signature, and date on the medical examination certificate
- Completed and signed medical examination certificate for each bus operator, dated within the past 24 months, will be maintained

on file for a minimum of four years from the date of the examination

- Transitions will not allow a driver to operate a transit bus without having on file a completed medical examination certificate dated within the past 24 months

## Operating and Driving Requirements

Transitions is responsible for overall compliance with all operating and driving requirements.

It is the responsibility of Transitions to ensure that employees who perform driving and/or operational duties strictly adhere to the following requirements:

- Under no circumstances is an employee allowed to operate a vehicle without having the appropriate and valid driver's license in his or her possession
- Employees are not permitted to drive a bus when his or her driver license has been suspended, cancelled, or revoked. An Employee who receives a notice that his or her license to operate a motor vehicle has been suspended, cancelled, or revoked is required to notify his or her supervisor of the contents of the notice immediately, if possible, otherwise no later than the end of the business day following the day he or she received the notice. Violation of this policy may result in disciplinary actions including termination of employment
- Transitions will annually check Motor Vehicle Records (MVR) for drivers for investigating information on license suspensions, revocations, accidents, traffic violations, unpaid summons, etc. Transitions may also check driver license status of each driver utilizing the Florida Department of Highway Safety and Motor Vehicles website - <https://www6.hsmv.state.fl.us/DLCheck/main.jsp>.
- Buses must be operated at all times in compliance with applicable traffic regulations, ordinances, and laws of the jurisdiction in which they are being operated
- Rule 14-90, FAC defines "On Duty" and "Off Duty" status of drivers as follows -
  - "On Duty" means the status of the driver from the time he or she begins work, or is required to be in readiness to work, until the time the driver is relieved from work and all responsibility for performing work. "On Duty" includes all time spent by the driver as follows:
    - (a) Waiting to be dispatched at bus transit system terminals, facilities, or other private or public property, unless the driver has been completely relieved from duty

- by the bus transit system
  - (b) Inspecting, servicing, or conditioning any vehicle
  - (c) Driving
  - (d) Remaining in readiness to operate a vehicle (stand-by)
  - (e) Repairing, obtaining assistance, or remaining in attendance in or about a disabled vehicle
- “Off-Duty” means any time the driver is not on duty, required to be in readiness to work, or under any responsibility to perform work. Such time shall not be counted towards the maximum allowed on-duty hours within a 24-hour period
- Drivers are not permitted to drive more than 12 hours in a 24-hour period or drive after having been on duty for 16 hours in a 24-hour period. A driver is not permitted to drive until the requirement of a minimum eight consecutive hours of off-duty time has been fulfilled. A driver’s work period begins from the time he or she first reports for duty to his or her employer. A driver is permitted to exceed his or her regulated hours in order to reach a regularly established relief or dispatch point, provided the additional driving time does not exceed one hour
- Drivers are not permitted to be on duty more than 72 hours in any period of seven consecutive days; however, any 24 consecutive hours of off duty time shall constitute the end of any such period of seven consecutive days. A driver who has reached the maximum 72 hours of on duty time during the seven consecutive days is required to have a minimum of 24 consecutive hours of off duty time prior to returning to on duty status
- A driver is permitted to drive for more than the regulated hours for the safety and protection of the public when conditions such as adverse weather, disaster, security threat, a road or traffic condition, medical emergency, or an accident occur
- Drivers are not permitted to drive a bus when his or her ability is impaired, or likely to be impaired, by fatigue, illness, or other causes, likely to create an unsafe condition
- Drivers will not report for duty or operate any vehicle while under the influence of alcohol or any other substance, legal or illegal, that may impair driving ability. All employees are required to comply with agency’s Substance Abuse Policy
- Drivers are required to conduct daily vehicle inspections and reporting of all defects and deficiencies likely to affect safe operation or cause mechanical malfunctions
- Drivers are required to immediately report any defect or deficiency that may affect safe operations or cause mechanical malfunctions. Any defect or deficiency found shall be properly documented on a Daily Vehicle Inspection (DVI) form and should be submitted to the Maintenance Department

- Each maintenance department will review daily inspection reports and document corrective actions taken as a result of any deficiencies identified by daily inspections
- A bus with any passenger doors in the open position will not be operated with passengers aboard. The doors will not be opened until the bus is stopped. A bus with any inoperable passenger door will not be operated with passengers aboard, except to move a bus to a safe location
- Drivers will ensure that during darkness, interior lighting and lighting in stepwells on buses shall be sufficient for passengers to enter and exit safely. Adherence to pre-trip inspection requirements help ensure the ability of this requirement to be met
- Passengers will not be permitted in the stepwells of any bus while the bus is in motion, or to occupy an area forward of the standee line
- Passengers will not be permitted to stand on buses not designed and constructed for that purpose
- Buses will not be refueled in a closed building. No bus shall be fueled when passengers are being carried
- Drivers are always required to be properly secured to the driver's seat with a restraining belt while the bus is in motion
- Buses will not be left unattended with passengers aboard for longer than 15 minutes. The parking or holding brake device will be properly set at any time the bus is left unattended
- Buses will not be left unattended in an unsafe condition with passengers aboard at any time.
- Drivers are prohibited from leaving keys in the vehicle for any reason at any time the bus is left unattended. Except during summer weather when clients are left on board while the driver exits to locate or deliver another client
- Transit vehicles will not be used at any time for uses other than those that are authorized and permitted according to state and federal program requirements

Noncompliance with these requirements may result in disciplinary actions, including termination of employment.

## **Safety Communication**

Transitions will use a variety of methods to communicate issues important to the operation of the SMS. This strategy will complement existing safety communication channels to make company personnel aware of SMS-related safety issues and their roles and responsibilities related to those issues.

Effective communication is an essential requirement to ensure and demonstrate closed-loop communication (lessons-learned) from the SMS as a part of the

continuous improvement of the SMS including:

- ⇒ Ensuring that all staff are appropriately aware of the SMS
- ⇒ Conveying SMS lessons/information
- ⇒ Explaining why SMS related activities are introduced or changed
- ⇒ Conveying SMS activity updates
- ⇒ Educating personnel on procedure for hazard and near-miss reporting
- ⇒ Promotion of the company's safety objectives, targets and culture

SMS communications methods vary but will comprise both internal/external communication and awareness.

### Internal Communication

Internal communication/awareness may be accomplished using:

- ⇒ Notice boards
- ⇒ Intranet postings
- ⇒ Regular safety meetings and/or training sessions
- ⇒ Telephone or email communications

### Safety Bulletins

Safety Bulletins are short newsletters drafted by the Safety Officer that detail safety particulars of immediate concern. Examples of safety bulletins include hazards, product safety recalls, procedures, emergency information and more. Safety bulletins are created on an as-need basis and are distributed internally in common areas. Statistics on preventable collisions, on-the-job injuries, or goals are updated monthly.

## Drug and Alcohol Testing Program

In compliance with the Drug-Free Workplace Act of 1988 and FTA policy 49 CFR part 40 and 655, Transitions Commute Solutions, LLC has a longstanding commitment to providing a safe, quality-oriented and productive work environment consistent with the standards of the community in which we operate. Alcohol and drug abuse pose a threat to the health and safety of employees and transit customers and to the security of our equipment and facilities. For these reasons, we are committed to the elimination of drug and/or alcohol use and abuse in the workplace.

This policy outlines the practice and procedure designed to correct instances of identified alcohol and/or drug use in the workplace. This policy continues to apply to all employees, “covered employees” of transit programs managed by Transitions and all applicants for employment. The Human Resources Department is responsible for policy administration.

### Employee Assistance and Drug-Free Awareness

Illegal drug use and alcohol misuse have a number of adverse health and safety consequences. Information about those consequences and resources of help for drug/alcohol problems is available from the Human Resources Department, who has been trained to make referrals and assist employees with drug/alcohol problems.

Ron Herman  
[Ron.Herman@Transit4U.com](mailto:Ron.Herman@Transit4U.com) 443-803-8035  
9am-5pm (Mon-Fri)

Transitions will assist and support employees who voluntarily seek help for such problems before becoming subject to discipline and/or termination under this or other policies. Such employees will be allowed to use accrued paid time off, placed on leaves of absence, referred to treatment providers and otherwise accommodated as required by law. Such employees may be required to document that they are successfully following prescribed treatment and to take and pass follow-up tests (return to duty) if they hold jobs that are safety-sensitive or require driving or have violated this policy previously. **Once a drug test has been scheduled, the employee will have forfeited** their right to be granted a leave of absence for treatment and possible discipline, up to and including discharge, will be unavoidable.

## General Information

Transition will use a designated collection facility to collect and conduct all testing procedures. Without the presence of reasonable suspicion, random testing, pre-employment or post-accident at no time will an employee be required to submit to a urine collection, breathe alcohol test, or saliva-test for a drug or alcohol test by an employee of Transitions. Collections of specimens will be conducted by Third Party Provider.

For the purpose of policy, a “Safety Sensitive” and “Covered Employee” are referred to as a “Covered Employee”. All “**Covered Employees**” will submit to mandatory drug testing. A “**Covered Employee**” is an employee that within the scope of employment operates, schedules, or dispatches a “Revenue” status vehicle.

For the purposes of this SOP, all Employees are considered “Covered Employees”, except the following positions, Executive Staff, Director of Finance, and Director of Human Resources.

**Transitions strictly follows the guidance of the Department of Transportation and the Federal Transit Administration to determine “illegal drugs” for testing purposes. Although states and medical professionals may adapt or provide different usage regulations, the results of a “positive” test for an “illegal” substance will be subject to and regulated by Federal guidance.**

Employees and “Covered Employees” must report to work fit for duty and free of any adverse effects of illegal drugs or alcohol. This policy does not prohibit employees from the lawful use and possession of prescribed medications. Employees must, however, consult with their doctors about the medications’ effect on their fitness for duty and ability to work safely and promptly disclose any work restrictions to their supervisor. Employees should not, however, disclose underlying medical conditions unless directed or legally obligated to do so.

Covered employees will receive at least 60 minutes of training on the effects and consequences of prohibited drug use on personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use.

Supervisors and/or other company officers authorized by Transitions to make reasonable suspicion determinations shall receive at least 60 minutes of training on the physical, behavioral, and performance indicators of probable drug use and at least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse. **Only supervisors that have verified training will be able to make suspicion referrals.**

An employee is entitled, upon written request, to obtain copies of any records pertaining to the employee's use of prohibited drugs or misuse of alcohol, including any records pertaining to his or her drug or alcohol tests. Transitions will provide promptly the records requested by the employee. Access to an employee's records will not be contingent upon the receipt of payment for the production of those records.

Records shall be made available to a subsequent employer of the employee upon receipt of a written request from the employee. Subsequent disclosure by the employer is permitted only as expressly authorized by the terms of the employee's request.

Transitions may disclose information required to be maintained under this SOP pertaining to an employee to the employee or the decision maker in a lawsuit, grievance, or other proceeding initiated by or on behalf of the individual and arising from the results of a drug or alcohol test under this part (including, but not limited to, a worker's compensation, unemployment compensation, or other proceeding relating to a benefit sought by the covered employee.)

Transitions will release information regarding an employee's record as directed by the specific, written consent of the employee authorizing release of the information to an identified person. Additionally, based on the requirements of specific operational contracts, records may be made available to the appropriate contract managers for review and verification purposes.

## Work Rules

1. Whenever employees are working, are operating any vehicle as an employee of Transitions, are present on Transitions premises, or are conducting Company related work off-site, they are prohibited from:

- using, possessing, buying, selling, manufacturing or dispensing an illegal drug (to include possession of drug paraphernalia);
- being under the influence of alcohol or an illegal drug as defined in this policy; and
- possessing or consuming alcohol.

2. The presence of any detectable amount of any illegal drug or illegal controlled substance in an employee's bodily system, while performing company business or while in a company facility, is prohibited.

3. Transitions will also not allow any employee to perform their duties while taking prescribed drugs that are adversely affecting the employee's ability to safely and



effectively perform their job duties. Employees taking a prescribed medication must carry it in the container labeled by a licensed pharmacist or be prepared to produce this if asked.

4. Any illegal drugs or drug paraphernalia will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

5. Employees may not use alcohol within 4 hours prior to performing safety-sensitive functions. If any employee is aware that another employee is in violation of this timeline, an employee must:

- a) Report the violation to a shift manager
- b) Contact the Program Manager or HR manager
- c) At no time will a Transitions employee be allowed to work if in violation of this timeline.

On-call employees. An employee that is "on-call" is prohibited from the consumption of alcohol for the specified on-call hours of each covered employee who is on-call.

The procedure shall include:

- a) The opportunity for the covered employee to acknowledge the use of alcohol at the time he or she is called to report to duty and the inability to perform his or her safety sensitive function.
- b) The requirement that the covered employee take an alcohol test, if the covered employee has acknowledged the use of alcohol but claims the ability to perform his or her safety sensitive function.

6. If an employee believes they are in violation of the breath concentration levels or timelines found in this SOP, the employee must acknowledge the use of alcohol at the time he or she is called to report to duty and the inability to perform his or her safety-sensitive function.

- a) If an employee has acknowledged the use of alcohol, the employee must submit to testing and pass the requirements of this SOP prior to beginning work.
- b) If a covered employee has a verified positive drug test result or has a confirmed alcohol test of 0.04 or greater or refuses to submit to a drug or alcohol test required by this part, the employer shall advise the employee of the resources available for evaluating and resolving problems associated with prohibited drug use and alcohol misuse, including the names, addresses, and telephone numbers of substance abuse professionals (SAPs) and counseling and treatment programs.

## Required Testing

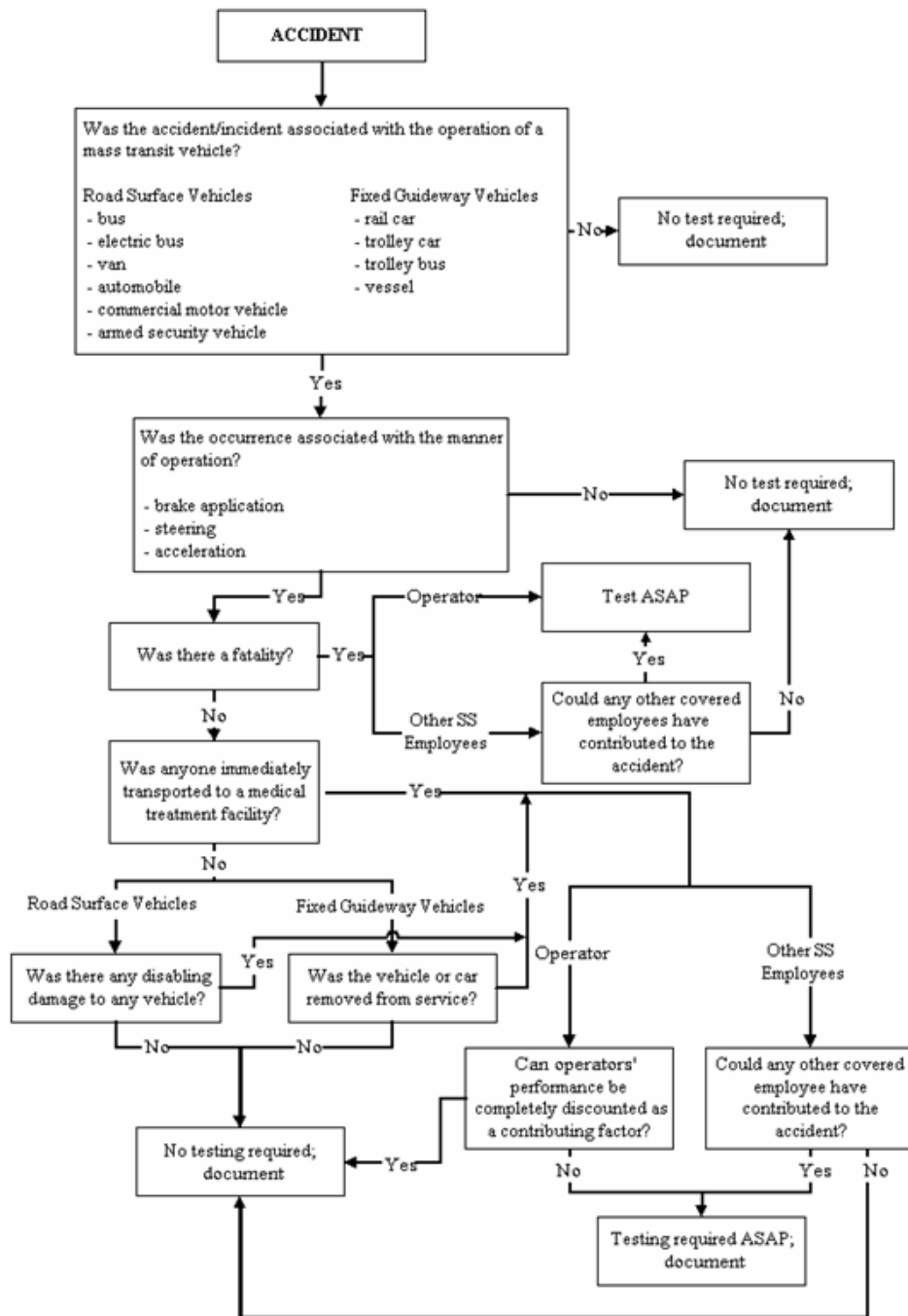
**Pre-employment:** All applicants for Covered Employee positions must pass a drug and alcohol test fully compliant with 49 CFR part 40 before beginning work or receiving an offer of employment. **Refusal to submit to testing for Transitions or from a previous employer will result in disqualification of further employment consideration.**

**Reasonable Suspicion:** Employees are subject to testing based upon (but not limited to) observations by supervision of apparent workplace use, possession or impairment. Human Resources, the Project Manager or the Director of Operations shall be consulted before sending an employee for testing. All levels of supervision making this decision must utilize the "Observation Checklist" to document specific observations and behaviors that create a reasonable suspicion that the person is under the influence of illegal drugs and/or alcohol. If the results of the "Observation Checklist" indicate further action is justified, the manager/supervisor should confront the employee with the documentation and with a union representative present (for all unionized employees) and/or with another member of management (for all non-unionized employees).655.15c)

***Under no circumstances will the employee be allowed to drive himself or herself to the testing facility. A member of supervision/management and a union rep (if appropriate) must escort the employee; the supervisor/manager will make arrangements for the employee to be transported home.***

**Post-accident:** Employees may be subject to testing when they participate, cause or contribute to accidents that damage a Transitions owned or operated vehicle, machinery, equipment, or property and/or result in an injury to themselves or another employee requiring off-site medical attention. A probable belief circumstance will be presumed to arise in any instance involving a work-related accident or injury in which an employee who was operating a motorized vehicle (including, but not limited to, fork truck, Transitions pickup truck, overhead cranes, aerial/man-lifts, passengers vehicles) is found to be responsible for causing the accident. In any of these instances, the investigation and subsequent testing must take place within two (2) hours following the accident, if not sooner.

Please see FTA Post Accident Decision Tree below:



If any employee cannot be tested with within two hours, the Human Resource Manager will document any reason for delay and insure the employee(s) are 1) tested for alcohol within 8 hours and 2) tested for drugs within 24 hours of the accident. All documents will be maintained and submitted to the FTA for review.

Any employee required to take a post-accident alcohol test must not consume alcohol for eight hours following the accident or until he or she undergoes a post- accident alcohol test, whichever occurs first.

The results of a blood, urine, or breath test for the use of prohibited drugs or alcohol misuse, conducted by Federal, State, or local officials having independent authority for the test, shall be considered to meet the requirements of this section provided such test conforms to the applicable Federal, State, or local testing requirements, and that the test results are obtained by Transitions. Such test results may be used only when the Transitions is unable to perform a post-accident test within the required period noted above in this section.

**Administration Leave / Absence from Work:** When an employee has not performed a safety-sensitive function for 90 consecutive calendar days regardless of the reason, and the employee has not been in the employer's random selection pool during that time, the employee will take a pre-employment drug test with a verified negative result before returning to work.

### Collection and Testing Procedures

Transitions will conduct random drug and alcohol tests which are unannounced and unpredictable and ensure that the dates for administering random tests are spread reasonably throughout the calendar year. Random testing will be conducted at all times of day when safety-sensitive functions are performed.

An employee who is notified of selection for random drug or random alcohol testing will proceed to the test site immediately. If the employee is performing a safety-sensitive function at the time of the notification, Transitions will remove the employee from duty, ensure that the employee ceases to perform the safety-sensitive function and proceeds directly to the testing site immediately.

An employee will be randomly tested for alcohol misuse while the employee is performing safety-sensitive functions; just before the employee is to perform safety-sensitive functions; or just after the employee has ceased performing such functions or at time suspicious activity is verified by a trained staff member. An employee may be randomly tested for prohibited drug use anytime while on duty.

Employees subject to alcohol testing shall be given the location or driven to if their work vehicle is disabled as a result of the accident to a designated facility and directed to provide breathe specimens.

## Consequences

An employee who is subject to post-accident testing who fails to remain readily available for such testing, including notifying Transitions of the incident, the location of the employee or if he or she leaves the scene of the accident prior to submission to such test, will be treated as if the employee refused to submit to testing unless medically incapacitated.

Transitions, at the sole discretion of the CEO and using the best available information at the employee. If an employee's breathe alcohol concentration is .04 or more, a second breath specimen shall be tested approximately 20 minutes later. The results of the second test shall be determinative. Alcohol tests may, however, be a breathe, blood or saliva test, at the Company's discretion. For purposes of this Policy, test results generated by law enforcement or medical providers may be considered by the Company as work rule violations.

An employee tested who is found to have an alcohol concentration of 0.02 or greater but less than 0.04 cannot perform or continue to perform safety-sensitive functions, until:

- (1) The employee's alcohol concentration measures less than 0.02; or
- (2) The start of the employee's next regularly scheduled duty period, but not less than eight hours following administration of the test.

Any employee with a positive alcohol will be immediately remove from "pay status" until the employee's breathe alcohol concentration is .00 or next business day. Any employee tested who is found to have an alcohol concentration of 0.02 or greater but less than 0.04 must provide a sample breathe alcohol concentration in .00 before returning to work.

Applicants and employees subject to drug testing shall be driven to a Transitions designated medical facility and directed to provide urine specimens. Applicants and employees may provide specimens in private unless they appear to be submitting altered, adulterated or substitute specimens. Collected specimens shall be sent to a federally certified laboratory and tested for evidence of marijuana, cocaine, Opioids, amphetamines, PCP, benzodiazepines, methadone, methaqualone and propoxphane

use. (Where indicated, specimens may be tested for other illegal drugs.) The laboratory shall screen all specimens and confirm all positive screens. There shall be a chain of custody from the time specimens are collected through testing and storage.

The laboratory shall transmit all positive drug test results to a Medical Review Officer ("MRO") retained by a company designated by Transitions, who shall offer persons with positive results a reasonable opportunity to rebut or explain the results. Persons with positive test results may also ask the MRO to have their split specimen sent to another federally certified laboratory to be tested at the applicant's or employee's own expense. Such requests must be made within 72 hours of notice of test results. If the second facility fails to find any evidence of drug use in the split specimen, the employee or applicant will be treated as passing the test. In no event shall a positive test result be communicated to Transitions until such time that the MRO has confirmed the test to be positive.

**Note:** Nothing in this section shall be construed to require the delay of necessary medical attention for the injured following an accident or to prohibit an employee from leaving the scene of an accident for the period necessary to obtain assistance in responding to the accident or to obtain necessary emergency medical care.

An employee that has a positive test for a breath alcohol reading greater than .04 will be at minimum, suspended one week, up to termination based on prior concerns.

An employee that has a positive test for control substances under 49 CFR part 40 and 655 will be terminated.

An employee that is terminated for violations under this SOP will be provided contact information for treatment and support centers relating to the use of drugs and alcohol.

Applicants who refuse to cooperate in a drug test or who test positive will not be hired and will not be allowed to re-apply/re-test in the future.

Employees who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture or dispense an illegal drug in violation of this policy will be terminated. *If the employee refuses to be tested yet we believe they are impaired, under no circumstances will the employee be allowed to drive himself or herself home.*

Employees will be paid for time spent in alcohol/drug testing and then suspended pending the results of the drug/alcohol test. After the results of the test are received, a date/time will be scheduled to discuss the results of the test; this meeting will include a member of management/supervision, a union representative (if requested and

supported), and Human Resources. Should the results prove to be negative, the employee will receive back-pay for the times/days of suspension.

## Retention of Records

Transitions will maintain records of its anti-drug and alcohol misuse program. The records shall be maintained in a secure location with controlled access by Director of Human Resources.

- Five years. Records of covered employee verified positive drug or alcohol test results, documentation of refusals to take required drug or alcohol tests, and covered employee referrals to the substance abuse professional, and copies of annual MIS reports submitted to FTA.
- Two years. Records related to the collection process and employee training.
- One year. Records of negative drug or alcohol test results.

The following specific records will be maintained:

- Collection logbooks, if used.
- Documents relating to the random selection process.
- Documents generated in connection with decisions to administer reasonable suspicion drug or alcohol tests.
- Documents generated in connection with decisions on post-accident drug and alcohol testing.
- MRO documents verifying existence of a medical explanation of the inability of a covered employee to provide an adequate urine or breathe sample.
- The employer's copy of the custody and control form.
- Documents related to the refusal of any covered employee to submit to a test required by this part.
- Documents presented by a covered employee to dispute the result of a test administered under this part.
- Records related to referral and return to duty and follow-up testing: Records concerning a covered employee's entry into and completion of the treatment program recommended by the substance abuse professional.
- Training materials on drug use awareness and alcohol misuse, including a copy of the employer's policy on prohibited drug use and alcohol misuse.
- Names of covered employees attending training on prohibited drug use and alcohol misuse and the dates and times of such training.
- Documentation of training provided to supervisors for the purpose of qualifying the supervisors to make a determination concerning the need for drug and alcohol testing based on reasonable suspicion.
- Certification that any training conducted under this part complies with the requirements for such training.

## Confidentiality

Information and records relating to positive test results, drug and alcohol dependencies and legitimate medical explanations provided to the MRO shall be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files. Such records and information may be disclosed among managers and supervisors on a need-to-know basis and may also be disclosed where relevant to a grievance, charge, claim or other legal proceeding initiated by or on behalf of an employee or applicant.

## Inspections

Transitions reserves the right to inspect all portions of its premises for drugs, alcohol or other contraband; affected employees may have union representation involved in this process. All employees, contract employees and visitors may be asked to cooperate in inspections of their persons, work areas, and property that might conceal a drug, alcohol, or other contraband. Employees who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline, up to and including discharge.

## Crimes Involving Drugs

Transitions prohibits all employees, including employees performing work under government contracts, from manufacturing, distributing, dispensing, possessing or using an illegal drug in or on Transitions premises or while conducting company business.

Transitions employees are also prohibited from misusing legally prescribed or OTC drugs. Law enforcement personnel shall be notified, as appropriate, where criminal activity is suspected.

Transitions does not desire to intrude into the private lives of its employees but recognizes that employee's off-the-job involvement with drugs and alcohol may have an impact on the workplace. Therefore, Transitions reserves the right to take appropriate disciplinary action for drug usage/sale/distribution while off company premises. All employees who are convicted of, plead guilty to, or are sentenced for a crime involving an illegal drug are required to report the conviction, plea or sentence to Human Resources within five days. Failure to comply will result in automatic discharge.



## Reasonable Suspicion and Post-Accident Testing Protocol

1. The employee will be advised that Transitions believes that there is reasonable suspicion to believe that he/she is affected by illegal drugs or alcohol (or due to the nature of the accident the policy mandates this) and that this test is being offered to confirm or deny this suspicion.
2. The employee will be transported to any one of the company's contracted testing facilities (i.e., Health Services, Prompt Care, or the Emergency Department). One member of management/designated attendant will accompany the employee along with a union representative, if requested by the employee. *Under no circumstances will the employee be allowed to drive himself or herself to the testing facility.*
3. Prior to leaving for the testing facility, supervision/management will contact the testing facility to inform them that staff from Transitions will be arriving and will need a drug and/or alcohol test completed.
4. Provide water for the employee to drink prior to leaving the plant and reasonable time - not to exceed 15 minutes - to secure photo ID in the company of a Transitions representative.
5. The employee to be tested MUST present a PHOTO ID (i.e., a driver's license or state ID card) to the testing facility staff before the specimen can be obtained. Ensure that the employee brings this with them when leaving Transitions premises.
6. The employee to be tested must sign a consent form provided by/at the testing facility. Refusal to sign is addressed under the "Consequences" section of this document.
7. Transitions representative must sign as a witness to the collection procedure, along with the tested employee.
8. After returning to the plant or when leaving the testing facility, the supervisor/manager MUST make arrangements to transport the person home (unless testing results are immediate). Under no circumstances will the tested employee be allowed to drive himself or herself home.

## Definitions

**“Company Premises”** includes, but is not limited to, all buildings, offices, facilities, grounds, parking lots, lockers, places and vehicles owned, leased or managed by Transitions or on any site on which the Company is conducting business.

**“Illegal Drug”** means a substance whose use or possession is controlled by federal law but that is not being used or possessed under the supervision of a licensed health care professional. (Controlled substances are listed in Schedules I-V of 21 C.F.R. Part 1308.) If any employee believes that a prescribed drug may be prohibited, it is the responsibility of the employee to contact the Human Resources Manager for clarification prior to returning to work under the influence of drug(s).

**“Refuse to Cooperate”** means to obstruct the collection or testing process; to submit an altered, adulterated, or substitute sample; to fail to show up for a scheduled test; to refuse to complete the requested drug testing forms; or fail to promptly provide specimen(s) for testing when directed to do so, without a valid medical basis for the failure. Employees who leave the scene of an accident without justifiable explanation prior to submission to drug and alcohol testing will also be considered to have refused to cooperate and will automatically be subject to discharge.

**“Refusal”** includes the following actions or statements as deemed a refusal by DOT 49 CFR 40.191 sub part 1.

1. Fail to appear for any test
2. Fail to remain at the testing site until the testing process is complete
3. Fail to provide a urine specimen for any drug test require by DOT or Transitions
4. In cases of directly observed or monitored collection, failing to permit observation or monitoring
5. Fail to provide a sufficient amount of urine when directed unless there is a medically adequate explanation.
6. Fail or decline additional drug test required by employer or collectionsite.
7. Fail to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process.
8. Fail to cooperate with any part of the testing process.
9. For an observed collection, fail to follow observer’s instructions.
10. Possess or wear a prosthetic or other devise that could be used to interfere with collection process.
11. Admit to collector or MRO you adulterated or substituted the specimen.
12. If the MRO verifies an adulterated specimen.

**“Under the Influence of Alcohol”** means an alcohol concentration equal to or greater than

.04, or actions, appearance, speech or bodily odors that reasonably cause a supervisor to conclude that an employee is impaired because of alcohol use.

**“Under the Influence of Drugs”** means a confirmed positive test result for illegal drug use per this policy. In addition, it means the misuse of legal drugs (prescription and possibly over-the-counter) where there is not a valid prescription from a physician for the lawful use of a drug in the course of medical treatment (containers must include the patient’s name, the name of the substance, quantity/amount to be taken, and the period of authorization).

**“DOT, the Department, DOT Agency”** means to encompass all DOT agencies, including, but not limited to, FAA, FRA, FMCSA, FTA, PHMSA, NHTSA, Office of the Secretary (OST), and any designee of a DOT agency. For the purposes of testing under 49 CFR Part 40. the USCG (in the Department of Homeland Security) is considered to be a DOT agency for drug testing purposes.

**“Substance Abuse Professional (SAP)”** means a licensed physician (medical doctor or doctor of osteopathy) or licensed or certified psychologist, social worker, employee assistance professional, state-licensed or certified marriage and family therapist, or drug and alcohol counselor (certified by an organization listed at <https://www.transportation.gov/odapc/sap>) with knowledge of and clinical experience in the diagnosis and treatment of drug and alcohol related disorders.

## **Drug and Alcohol Training Program**

Every covered employee will receive a copy of this policy and will have ready access to the corresponding federal regulations including 49 CFR Parts 655 and 40, as amended. In addition, all covered employees will undergo a minimum of 60 minutes of training on the signs and symptoms of drug use including the effects and consequences of drug use on personal health, safety, and the work environment. The training also includes manifestations and behavioral cues that may indicate prohibited drug use.

All supervisory personnel or company officials who are in a position to determine employee fitness for duty will receive 60 minutes of reasonable suspicion training on the physical, behavioral, and performance indicators of probable drug use and 60 minutes of additional reasonable suspicion training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.

## Zero Tolerance Policy

### Purpose

- 1) TCS provides public transit and paratransit services for the residents in active contractual areas to include Florida, Georgia, and Ohio. Part of our mission is to ensure that this service is delivered safely, efficiently, and effectively by establishing a drug and alcohol-free work environment, and to ensure that the workplace remains free from the effects of drugs and alcohol in order to promote the health and safety of employees and the general public. In keeping this goal in mind and Federal Laws, TCS declares that the unlawful manufacture, distribution, dispense, possession, or use of controlled substances or misuse of alcohol is prohibited for all employees.
- 2) Additionally, the purpose of this policy is to establish guidelines to maintain a drug and alcohol-free workplace in compliance with the Drug-Free Workplace Act of 1988, and the Omnibus Transportation Employee Testing Act of 1991. This policy is intended to comply with all applicable Federal regulations governing workplace anti- drug and alcohol programs in the transit industry. Specifically, the Federal Transit Administration (FTA) of the U.S. Department of Transportation has published 49 CFR Part 655, as amended, that mandates urine drug testing and breath alcohol testing for safety-sensitive positions, and prohibits performance of safety-sensitive functions when there is a positive test result. The U. S. Department of Transportation (USDOT) has also published 49 CFR Part 40, as amended, that sets standards for the collection and testing of urine and breath specimens.
- 3) Any provisions set forth in this policy that are included under the sole authority of TCS and are not provided under the authority of the above-named Federal regulations are underlined. Tests conducted under the sole authority of TCS will be performed on non-USDOT forms and will be separate from USDOT testing in all respects.

### Applicability

This Drug and Alcohol Testing Policy applies to all safety-sensitive employees (full- or part- time) when performing safety sensitive duties TCS employees that do not perform safety- sensitive functions are also covered under this policy under the sole authority of TCS. See Attachment A for a list of employees and the authority under which they are included.

A safety-sensitive function is operation of public transit service including the operation of a revenue service vehicle (whether or not the vehicle is in revenue service), maintenance of a revenue service vehicle or equipment used in revenue service, security personnel who carry firearms, dispatchers or persons controlling the movement of revenue service vehicles and any transit employee who operates a vehicle that requires a Commercial Drivers' License to operate. Maintenance functions include the repair, overhaul, and

## Prohibited Substances

Prohibited substances addressed by this policy include the following:

**Illegally Used Controlled Substance or Drugs** Under the Drug-Free Workplace Act of 1988 any drug or any substance identified in Schedule I through V of Section 202 of the Controlled Substance Act (21 U.S.C. 812), and as further defined by 21 CFR 1300.11 through 1300.15 is prohibited at all times in the workplace unless a legal prescription has been written for the substance. This includes, but is not limited to: marijuana, amphetamines (including methamphetamine and ecstasy), opioids (including codeine, morphine, heroin, hydrocodone, hydromorphone, oxycodone, and oxymorphone [common brand names for these semi-synthetic opioids include, but may not be limited to: OxyContin, Percodan, Percocet, Vicodin, Lortab, Norco, Dilaudid, and Exalgo]), phencyclidine (PCP), and cocaine, as well as any drug not approved for medical use by the U.S. Drug Enforcement Administration or the U.S. Food and Drug Administration. Illegal use includes use of any illegal drug, misuse of legally prescribed drugs, and use of illegally obtained prescription drugs. Also, the medical use of marijuana, or the use of hemp related products, which cause drug or drug metabolites to be present in the body above the minimum thresholds is a violation of this policy.

Federal Transit Administration drug testing regulations (49 CFR Part 655) require that all employees covered under FTA authority be tested for marijuana, cocaine, amphetamines (including methamphetamine and ecstasy), opiates (including heroin), and phencyclidine as described in Section H of this policy. Employees covered under company authority will also be tested for these same substances. Illegal use of these five drugs is prohibited at all times and thus, covered employees may be tested for these drugs anytime that they are on duty. Alcohol: The use of beverages containing alcohol (including any mouthwash, medication, food, candy) or any other substances such that alcohol is present in the body while performing safety-sensitive job functions is prohibited. A random or reasonable suspicion alcohol test can only be performed on a covered employee under 49 CFR Part 655 just before, during, or just after the performance of safety-sensitive job functions. Under TCS authority, a non-DOT alcohol test can be performed any time and a covered employee is on duty.

**Legal Drugs:** The appropriate use of legally prescribed drugs and non-prescription medications is not prohibited. However, the use of any substance which carries a warning label that indicates that mental functioning, motor skills, or judgment may be adversely affected must be reported to TCS supervisor and the employee is required to provide a written release from his/her doctor or pharmacist indicating that the employee can perform his/her safety-sensitive functions.

## Prohibited Conduct

- 1) All covered employees are prohibited from reporting for duty or remaining on duty any time there is a quantifiable presence of a prohibited drug in the body above the minimum thresholds defined in 49 CFR PART 40, as amended.
- 2) Each covered employee is prohibited from consuming alcohol while performing safety-sensitive job functions or while on-call to perform safety-sensitive job functions. If an on-call employee has consumed alcohol, they must acknowledge the use of alcohol at the time that they are called to report for duty. The covered employee will subsequently be relieved of his/her on-call responsibilities and subject to discipline for not fulfilling his/her on-call responsibilities.
- 3) The Transit Department shall not permit any covered employee to perform or continue to perform safety-sensitive functions if it has actual knowledge that the employee is using alcohol
- 4) Each covered employee is prohibited from reporting to work or remaining on duty requiring the performance of safety-sensitive functions while having an alcohol concentration of 0.04 or greater.
- 5) No covered employee shall consume alcohol for eight (8) hours following involvement in an accident or until he/she submits to the post-accident drug/alcohol test, whichever occurs first.
- 6) No covered employee shall consume alcohol within four (4) hours prior to the performance of safety-sensitive job functions.
- 7) TCS under its own authority, also prohibits the consumption of alcohol at all times the employee is on duty, or anytime the employee is in uniform.
- 8) Consistent with the Drug-free Workplace Act of 1988, all TCS employees are prohibited from engaging in the unlawful manufacture, distribution, dispensing, possession, or use of prohibited substances in the work place including transit system premises and transit vehicles.

Any covered employee that has a verified positive drug or alcohol test, or test refusal, will be removed from his/her safety-sensitive position, informed of educational and rehabilitation programs available, referred to a Substance Abuse Professional (SAP) for assessment, and will be terminated.

Following a negative dilute the employee will be required to undergo another test. Should this second test result in a negative dilute result, the test will be considered a negative and no additional testing will be required unless directed to do so by the MRO.

Refusal to submit to a drug/alcohol test shall be considered a positive test result and a direct act of insubordination and shall result in termination and referral to an SAP. A test refusal includes the following circumstances:

- a. Fails to appear for any test (excluding pre-employment) within a reasonable time, as determined by the employer, after being directed to do so by the employer
- b. Fails to remain at the testing site until the testing process is complete
- c. Fails to provide a urine or breath specimen for any drug or alcohol test required by Part 40 or DOT agency regulations
- d. In the case of a directly observed or monitored collection in a drug test, fails to permit the observation or monitoring of your provision of a specimen
- e. Fails to provide a sufficient amount of urine or breath when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure
- f. Fails or declines to take a second test the employer or collector has directed you to take
- g. Fails to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER as part of the  
`shy bladder" or "shy lung" procedures
- h. Fails to cooperate with any part of the testing process (e.g., refuse to empty pockets when so directed by the collector, behave in a confrontational way that disrupts the collection process)
- i. If the MRO reports that there is verified adulterated or substituted test result
- j. Failure or refusal to sign Step 2 of the alcohol testing form
- k. Failure to follow the observer's instructions during an observed collection including instructions to raise your clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if you have any type of prosthetic or other device that could be used to interfere with the collection process.
- l. Possess or wear a prosthetic or other device that could be used to interfere with the collection process
- m. Admit to the collector or MRO that you adulterated or substituted the specimen.

## Grievance Process

The consequences specified by 49 CFR Part 40.149 (c) for a positive test or test refusal is not subject to arbitration.



# APPENDIX 1 TRANSIT EMPLOYEE ASSAULT PREVENTION

## 1. Policy Statement

Transitions is committed to providing a safe work environment and service that is free from violence or the threat of violence. Transitions has adopted a zero-tolerance policy on actual, attempted and or threatening behavior or violence against or by any employee or member of the public on our property or utilizing Transitions services.

### Purpose

This policy is intended to:

Provide direction to employees that will result in a proactive workplace culture that identifies and mitigates potential or existing workplace violence.

Provide a definition of transit employee assault

Establish and detail the responsibilities of all Transitions employees, to maintain a workplace free from actual, attempted or threatened violence

Ensure that incidents are reported to Dispatch and/or to the Safety department as appropriate. Ensure that incidents are received and investigated in a timely manner by the Safety Officer

### Applicability

- This policy applies to all employees, including all full-time and part-time employees, temporary, casual employees. This policy also applies to all persons on Transitions property including, but not limited to, contractors, volunteers, students, and members of the public
- This policy is subject to annual review, and modifications will be made as deemed necessary to respond to current conditions and evolving needs

Transit employees are at a higher risk of assault due to:

- Direct interaction with the public, especially with passengers who may be intoxicated, have mental illness, or be experiencing frustration due to fare increases, service reductions, or delays are more likely to be verbally or physically abusive
- Working alone, in isolated or high-crime areas, during late night or early morning hours raises the risk of assault
- Handling and/or enforcing fares and company policy. Most assaults against bus operators occur during these disputes
- Having inadequate escape routes. Transit operators often lack a way to escape from passengers who threaten or begin to assault them

Transitions will prosecute all employee assault and/or battery incidents pursuant with Florida Statue XLVI Chapter 784:

## Definition of Assault and Battery

### The 2019 Florida Statutes

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[Title XLVI](#)  
CRIMES

[Chapter 784](#)

[View Entire Chapter](#)

ASSAULT; BATTERY; CULPABLE NEGLIGENCE

Transit employee assault is defined as:

784.011 Assault.—

1. An “assault” is an intentional, unlawful threat by word or act to do violence to the person of another, coupled with an apparent ability to do so, and doing some act which creates a well-founded fear in such other person that such violence is imminent.

784.03 Battery; felony battery.—

The offense of battery occurs when a person:

1. Actually and intentionally touches or strikes another person against the will of the other; or

2. Intentionally causes bodily harm to another person.

784.07 Assault or battery of law enforcement officers, firefighters, emergency medical care providers, public transit employees or agents, or other specified officers; reclassification of offenses; minimum sentences.—

(e) “Public transit employees or agents” means bus operators, train operators, revenue collectors, security personnel, equipment maintenance personnel, or field supervisors, who are employees or agents of a transit agency as described in s. 812.015(1)(l).

(2) Whenever any person is charged with knowingly committing an assault or battery upon a

a person licensed as a security officer as defined in s. 493.6101 and wearing a uniform that bears at least one patch or emblem that is visible at all times that clearly identifies the employing agency and that clearly identifies the person as a licensed security officer, or a security officer employed by the board of trustees of a community college, while the officer, firefighter, emergency medical care provider, traffic accident investigation officer, traffic infraction enforcement officer, inspector, analyst, operator, law enforcement explorer, parking enforcement specialist, public transit employee or agent, or security officer is engaged in the lawful performance of his or her duties, the offense for which the person is charged shall be reclassified as follows:

(a) In the case of assault, from a misdemeanor of the second degree to a misdemeanor of the first degree

(b) In the case of battery, from a misdemeanor of the first degree to a felony of the third degree

(c) In the case of aggravated assault, from a felony of the third degree to a felony of the second degree

(d) In the case of aggravated battery, from a felony of the second degree to a felony of the first degree

Notwithstanding s. 948.01, adjudication of guilt or imposition of sentence shall not be suspended, deferred, or withheld, and the defendant is not eligible for statutory gain-time under s. 944.275 or any form of discretionary early release, other than pardon or executive clemency, or conditional medical release under s. 947.149, prior to serving the minimum sentence.

⇒ Examples include, but are not limited to: pushing, kicking, hitting, pinching, spitting,

sexual assault, the attempt or threat of an assault, threatening the use of a weapon, comments or jokes about causing harm to an employee or person, stalking or harassment, and physical intimidation, bullying, mobbing, or threatening gestures. Such behaviors may be verbal, written, a gesture or an outright physical act

⇒ Employees who engage in conduct that contravenes this policy are subject to progressive discipline, up to and including termination

## **Roles and Responsibilities**

### Employee Responsibilities

All employees are responsible for:

- Reading and understanding this policy
- Upholding the principles set out in this policy
- Not engaging in violent acts against any persons
- Maintaining a safe work environment
- Not engaging in or ignoring violent, threatening, intimidating or other disruptive behaviors
- Acting respectfully towards others
- Cooperating with all efforts to investigate and resolve matters that violate this policy
- Immediately reporting all incidents of violence to Dispatch or the Safety Department
- Reporting promptly to their supervisor any and all incidents where the employee is subjected to, witnesses, or has knowledge of aggression/assault or reason to believe that violence may occur
- Preventing and reporting acts of violence that threaten or perceive to threaten a safe work environment

### Supervisory Responsibilities

All supervisors and managers are responsible for:

- Upholding the principles set out in this policy
- Communicating and educating employees on this policy
- Educating employees on transit employee assault risks and hazard controls specific to their work location
- Not engaging in any behavior contrary to this policy
- Not allowing or condoning any behavior contrary to this policy
- Conducting Hazard Identification and Risk Assessments that identify the potential risks of violence/ transit employee assault based on the nature of the work and the work environment
- Responding to incidents of aggression/ transit employee assault and/or providing assistance to the Safety department in order to expedite assistance to the employee in distress
- Immediately reporting all incidents of violence/ assault to Dispatch and/or Safety Department  
Assist in investigating incidents and complaints of aggression/ transit employee assault
- Taking prompt action to resolve situations

### Safety Officer's Responsibilities

The Safety Officer is responsible for:

- Upholding the principles set out in this policy  
Providing education and training to all employees on transit employee assault prevention and awareness
- Provide assistance to supervisors and management in identifying assault risks, and how to eliminate or minimize those risks to our operators
- Conduct audits to ensure mitigations in place are effective and appropriate
- Recommending and assisting in the implementation of controls to minimize the risks of transit employee assaults
- Conducting investigations of transit employee assault or reports of potential risks to operators.
- Maintaining accurate records of all reported transit employee assaults
- Track reports to identify high-crime areas and work with Operations Department to implement mitigation measures, such as targeted training for operators who work these routes
- Educate employees about assaults and high-risk areas by means of fact sheets, posting incident statistics or any other material in work areas the operators congregate (terminal areas, breakrooms, main office, using intranet websites and distributing newsletters)
- Maintain assault offender binder in both terminals and the main office of offenders. Pictures of offenders will be available for operator to review in all three locations and will indicate if the customer has been trespass
- Notifying human resources when appropriate  
Participating in the review of this policy for continuous improvement

### Dispatch Responsibilities

Dispatch is responsible for:

- Upholding the principles set out in this policy
- Respond to all transit employee assault related calls by immediately coordinating the dispatching of the appropriate police services and/or emergency personnel as required
- Notifying safety and supervision of the incident and assisting as required
- E-mail dispatch notification of the incident to Accident-Incident distribution list

### Human Resources Responsibilities

The Human Resources is responsible for:

- Upholding the principles set out in this policy
- Promoting compliance with this policy
- Responding to complaints of transit employee assault in a timely manner
- Coordinate with safety department on transit employee assault incidents and investigations

- Reviewing reports from the Safety Department, hazard assessments, and the effectiveness of controls implemented to minimize or eliminate the risks of transit employee assault
- Participating in the review of this policy for continuous improvement

#### Training Department's Responsibilities

The Training Department is responsible for:

- Upholding the principles set out in this policy
- Educate employees on the requirements of this policy
- Provide initial and annual refresher training to employees on transit employee assault awareness and prevention

### **Risk Management**

Data and/or reports that indicate increased risk of transit employee assault will be entered into the Hazard Log. The data will be evaluated in accordance with chapter 6 of the PTASP (Risk & Hazard Identification and Assessment). CAP's or mitigations will be completed if the hazard warrants. Transitions will respond to and fully investigate every report of assault and other incidents of violence or aggression against transit employees.

### **Reporting Incidents of Transit employee assault**

Any employee who has been threatened, becomes aware of, witnesses, or has been involved in transit employee assault must immediately notify Dispatch. Dispatch will contact the appropriate first responders as required, supervisors and safety.

Safety and supervisors will respond to the scene as quickly and safely as possible ensuring there is no escalation of the situation.

### **Enforcement Tools**

Transitions will develop a passenger code of conduct and post the code as well as the penalties for violating this code in terminal areas. Code of conduct will inform passengers of the consequences of aggressive behavior.

Transitions uses the Passio system GPS tracking which allows us to locate and respond quickly to an emergency, particularly during incidents in which the vehicle remains in motion or the operator is unable to communicate.

Vehicle on-board video surveillance is used to the maximum extent possible on all revenue vehicles. Both transit terminals are also equipped with security cameras of the terminal grounds.

### **Investigation of Transit employee assault**

All incidents of transit employee assault must be documented on an incident form, no later than the end of their shift, by the reporting person or employee. Safety or supervisor responding to the incident will conduct the investigation and complete the incident investigation form. These incidents will be fully investigated and documented internally even in circumstances where the Police are conducting a criminal investigation into the incident.

The Safety Officer will collect all incident forms, witness statements, police reports, and video evidence and conduct a full investigation.

A written report of the results of the investigation to be available to senior management and Human Resources.

### **Transit employee assault Post Incident Response**

All transit employees involved or affected by an assault incident should be offered support from Human Resources. EAP, Workman Compensation and/or together with any other measures deemed appropriate by Transitions will be available to victims of assault. Operators may be pulled from their bid schedule based on the severity of the situation.

### **Non-Attribution Employee Reporting**

Any person who reports an incident, or acts as a witness in good faith, is protected from reprisal or the threat of reprisal. Reprisal is defined as any act of retaliation, either direct or indirect, in both work and service environments. Any employee who engages in reprisal against anyone who has filed a complaint or who is co-operating in an investigation of a complaint will be disciplined up to and including dismissal.

Safety Assurance is accomplished through implementation of safety oversight and risk monitoring activities. As Transitions implements its SMS, several activities will be initiated and tools will be developed to support these safety oversight and risk monitoring activities. Safety assurance includes safety reviews, evaluations, reviews, and inspections, as well as safety data collection, tracking, and analysis, from various sources, including investigations.

Transitions will focus on the following safety performance measures:

- ⇒ **Employee Assaults** – total number of employees assaulted by customers per total vehicle revenue miles, separated by mode
- ⇒ **Employee Battery** – total number of employees assaulted by customers per total vehicle revenue miles, separated by mode
- ⇒ **Customer Assaults** – total number of customers assaulted by other customers per total vehicle revenue miles, separated by mode
- ⇒ **Customer Battery** – total number of customers battered by other customers per total vehicle revenue miles, separated by mode

### **Analysis**

Monthly, quarterly, annual and ad-hoc reports are run by the Safety, Security and Training Department to examine data trends in comparison with previous time periods.

The Safety, Security and Training Department examines reports in the following areas:

- Internal, external and regulatory inspections and audits
- Aggressive customer events, unusual customer behavior, trespass reports, rules and policy violations
- Assaults and battery events for all modes
- Any factors that reveal unsafe trends or elevated risks that could lead to employee assault
- Open CAP's and corrective action measures already in place

### **Reporting and Distribution**

Safety, Security and Training uses results of trending and data analysis to develop various

reports. A report is provided on a quarterly basis, or as required, to the Executive Director. A monthly report is sent to the department management to highlight key safety, security and assault data.

### **Safety Promotion**

The training received by an employee is dependent on his/her job classification and the responsibilities of his/her position. The training programs may also include on-the-job training that is monitored by a supervisor or mentor. Training efforts are first started at the initial stages of employment and are continued periodically throughout an employee's career as necessary to maintain certifications and to ensure the employee is capable of performing his/her duties in a safe and efficient manner. Employees also receive annual refresher training as a medium to reinforce concepts and introduce new training classes. The Training Department maintains training requirements as outlined in 49 CFR Part 673.

## **APPENDIX 2 PASSENGER EVACUATION-GREATER THAN THREE WHEELCHAIRS**

Remember your priority in any emergency is to protect yourself and the passengers. In the event of a fire or collision that requires evacuation of body-on-chassis vehicle with more than three wheelchair positions should follow the following steps:

1. Stand (if vehicle height permits), open the doors (ensure that exits are open and usable), face the passengers, and get their attention. Explain that there is an emergency and that they must evacuate the vehicle immediately.
2. Give clear directions to the passengers, telling them which exit to use and pointing to the exit(s).
3. Ask an able-bodied passenger to stand outside the front door to account for the passengers and to assist them if necessary (offer a hand, do not pull anyone out).
  - a. Ask another able-bodied assisting passenger to take the passengers to a safe place that you designate, at least 100 feet (approximately 40 paces) from the vehicle.
4. Keep the passengers in a group and safely away from the vehicle, traffic and any other hazards.
5. Assist passengers with disabilities. Use your cell phone to call the Dispatcher:
  - a. You should evacuate a passenger in a wheelchair only if it is more dangerous to leave them on the bus (e.g. fire, fuel leak, explosion, bomb threat, traffic hazard, physical peril).
  - b. Use the lift or ramp if available (you may have to use the manual function of the lift).
    - Lower side lift halfway if operating
    - The wheelchair that is closer to the available door will be evacuated first
    - Release chairs one at a time and remove chairs from bus by first lowering chair to the lift and then to the ground
    - Electric chairs are too heavy for this. Remove the passenger from the chair and carry them out of the bus
    - If time or situation does not allow use of the lift, passengers with manual wheelchairs may be maneuvered out of the door while remaining in their wheelchair if the vehicle's aisles are large enough. Use the assistance of another passenger if required.
    - When evacuating through both the front and back doors at the same time, the Operator must determine which seats go out which exit and then follow the procedures outlined for both front and rear door evacuations
    - Maneuver the wheelchair backwards to prevent from tipping the passenger out of their wheelchair
6. If assistance is not available, or time does not allow, lift, or drag the passenger through one of the emergencies exits. Passengers may have some experience with similar types of transfer.
7. If safe to do so, check the vehicle to ensure that no one is left behind.



7. Remain calm during the evacuation proceedings. Your passengers will look to you for direction, and they will be less likely to panic if you remain calm.

### CRITICAL PROBLEMS OF EVACUATION AND RESCUE

Paratransit buses are growing in popularity among the elderly and disabled and are providing significant numbers of trips in areas where coordinated or special effort systems exist. In the event of

1. Fire
2. Collision

If the first evidence of a bus fire, the operator may have time to evacuate all occupants before the vehicle becomes totally involved. Such an evacuation would have to be conducted by the operator in a very physical manner: there probably would not be enough time to use a lift or ramp with 3 or more wheelchair being evacuated.

Passengers may have preexisting conditions, medical issues, that may affect the type of emergency treatment required and the manner of its administration: passengers may become entrapped or impaled by the very aids that generally improve their life experience (e.g., wheelchairs, tie-downs, walkers, crutches).

Passengers may not be rational: passengers may not be able to physically contribute to extrication maneuvers.

However, in Paratransit usage, buses are often equipped to seat as many as 15 individuals, may be modified with lifts and tie-down devices to serve the special needs of the disabled, or may be equipped with a raised roof structure. The passengers are consequently tightly packaged within the vehicle.

Wheelchair lifts that block entrances and that are not effectively counterbalanced, and other poorly accomplished modifications have proven to reduce the degree of safety associated with some modified vans.