GoRaleigh Public Transportation Safety Plan

GoRaleigh Fixed Route Service

GoRaleigh Access Service

Developed in accordance with:

Federal Transit Administration (FTA)

49 CFR Part 673

Overview

On July 19, 2018, the Federal Transit Administration (FTA) published the Public Transportation Agency Safety Plan (PTASP) regulation, 49 CFR Part 673, as required by 49 U.S.C. § 5329(d). The PTASP regulation implements a risk-based Safety Management System approach and requires recipients or subrecipients of financial assistance under FTA's Urbanized Area Formula Program (49 U.S.C. § Section 5307) and rail transit agencies to establish and certify that they have an Agency Safety Plan in place that meets statutory requirements, as required by 49 U.S.C. §5329(d)(1).

The plan must

- include safety performance targets, which are developed through FTA's Performance-Based Planning guidance,
- certify the safety plan by July 2021, and
- be updated and certified by the transit agency annually.

The rule applies to all operators of public transportation systems that are recipients and sub-recipients of federal financial assistance under the Urbanized Area Formula Program (49 U.S.C. § 5307).

This safety plan comprehensively addresses both the fixed route and paratransit programs, offered by the City of Raleigh and GoRaleigh.

Fixed Route Service, starting at page 3

Paratransit Service, starting at page 125

GoRaleigh Fixed Route
Public Transportation Safety Plan

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Services provided by Transdev North America

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Section 1. Transit Agency Information

General Information

GoRaleigh/Transdev

Accountable Executive: Marie Parker, General Manager

Chief Safety Officer: Morris Cook, Safety Manager

Address: 4104 Poole Road

Raleigh, NC 27610

Phone Number: 919-996-3900

Website: https://goraleigh.org/

Modes of Service: Fixed Route

FTA Funding Sources: FTA Section 5307

Modes of Service Directly Provided:

☒Fixed Route Bus ☐Intercity Bus ☐Bus Rapid Transit

☐Demand Response ☐Complimentary Paratransit

☐Transdev does not provide transit services on behalf of another transit agency or entity.

☒Transdev provides transit service on behalf of the following transit agency(s) or entity(s):

GoRaleigh

Section 2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	GoRaleigh/Transdev	
Signature by the Accountable Executive	**Signature of Accountable Executive**	**Date of Signature**
	Mario Parker	12/02/20
Approval by the Board of Directors or an Equivalent Authority	**Name of Individual/Entity That Approved This Plan**	**Date of Approval**
	Relevant Documentation (title and location)	
Certification of Compliance	**Name of Individual/Entity That Certified This Plan**	**Date of Certification**
	Relevant Documentation (title and location)	

Version Number and Updates

Record the complete history of successive versions of this plan.

Version Number	Section/Pages Affected	Reason for Change	Date Issued

Annual Review and Update of the Public Transportation Agency Safety Plan

Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.

This document will be reviewed annually during the month of June and may be updated as needed during periods of significant organizational change. Reviewing this document does not mean it has to be revised, so long as it still complies with 49 C.F.R. Part 673. To protect from unauthorized editing, the original document will be password protected. If this document is shared, it will only be shared via PDF or print version of the document with anyone except the document controller and authorized reviewer/approver.

Section 3. Safety Performance Targets

Modes of Transit Service	Fatalities (total - 2015-2019)	Fatalities (per 10 million miles – 2015-2019)	Injuries (total – 2015-2019)	Injuries (per 10 million miles– 2015-2019)	Safety Events (total – 2015-2019)	Safety Events (per 10 million miles – 2015-2019)	System Reliability (VRM/failures – 2015-2019)
Fixed Route Service	0	0	207	125.7	325	197.3	294156.5

The Safety performance Targets above reflect a five-year period including the years 2015-2019. Going forward, Safety Performance Targets will be reviewed by GoRaleigh over a fiscal year period and will be evaluated after the initial baseline year of 2021.

Performance Measures:

- FATALITIES (total number of reportable fatalities and rate per total vehicle revenue miles: Fixed Route)
    - Customers, employees and the public
        - Fatalities, Fixed Route: 0
        - Revenue miles, Fixed Route: 16,472,766 miles in the past five years (2015-2019)
- INJURIES (total number of reportable injuries and rate per total vehicle revenue miles: Fixed Route)
    - Customers, employees and the public
        - Accidents with injuries, Fixed Route: 207
        - Revenue miles, Fixed route: 16,472,766 miles in the past five years (2015-2019)
- SAFETY EVENTS (total number of reportable events and rate per total vehicle revenue miles: Fixed Route)
    - Combined above with reportable incidents for customers, employees and the public
        - Safety incidents, Fixed Route: 325
        - Revenue miles, Fixed Route: 16,472,766 miles in the past five years (2015-2019)
        - A safety event/incident is an unintended event that disturbs normal operations. Incidents range in severity from near misses to fatal accidents.

- SAFETY PERFORMANCE MEASURE: SYSTEM RELIABILITY (mean distance between major mechanical failures by mode)

- Relationship with TAM Plan – State of Good Repair (SGR) by mode
  - State of Good Repair: Go Raleigh Transits goal is maintaining the quality of our states public transit & service vehicles by ensuring a consistently high state of good repair. We do this by ensuring we provide reliable service to our riders, cleaning our vehicles, following safety guidelines to NCDOT's standards and conducting scheduled preventative maintenance on time in accordance with guidelines given by the vehicle manufacture. Our vehicles are being introduced to new technology and/or vehicles are being replaced in a timely & cost-effective manner. All while being mindful of federal, state, and local funding when making these decisions. Go Raleigh's SGR is key in making and keeping our vehicles advanced, reliable & safe now and in the future.
  - Policies impacting system reliability: We keep up our vehicle reliability by completing preventative maintenance by mileage with a checklist for 7.5k, 15k, 30k, 45k, 60k & annual PM's. Daily wash/cleaning along with disinfecting all transit and service vehicles. Daily service check of all fluids and refilling as needed, and daily fueling.
  - Annual System Reliability: We have electronic Preventative Maintenance preformed on our vehicles. They are done by mileage intervals starting at 30k and then again at 60k & 120k. EPM's consist of the following being checked and updated as needed; destination sign operation, fair box, passenger counter, camera systems, talking bus AVL (Automatic Vehicle Location) System, passenger chime, cash box/bin probing, ZONAR & radio check.
  - Revenue miles: 13,393.16 Actual vehicle revenue miles
  - Major mechanical failure by mode with dates:

Year	Make	VIN	Failure	Date
2009	Gillig	15GGD271591176734	Engine	03/04/2020
2009	Gillig	15GGD271791176735	Engine	03/24/2020
2009	Gillig	15GGD271991176722	Engine	06/29/2020
2008	Gillig	15GGB271781078874	Engine	09/30/2019

  - Major mechanical failure: GoRaleigh considers engine, transmission and rear end/differential as major failures. As well as any vehicles totaled due to an accident.
    - 1 Towed from service
    - Greater than $4,000.00 of repairs
    - Greater than 45 days out of service

Safety Performance Target Coordination

GoRaleigh shares safety performance targets with the City of Raleigh annually as part of our continued coordination of transit data. This data also includes Transit Asset Management Plan updates and anticipated capital replacement schedules. The Accountable Executive shares this ASP, including safety performance targets, with the MPO (City of Raleigh) in our service area each year after its formal adoption by GoRaleigh. The Accountable Executive also provides a copy of our formally adopted plan to North Carolina Department of Transportation. In addition, GoRaleigh coordinates with NCDOT and the City of Raleigh in the selection of NCDOT and the City of Raleigh's safety performance targets as requested and outlined in GoRaleigh's Metropolitan Planning Agreement.

Targets Transmitted to the State	**State Entity Name**	**Date Targets Transmitted**
	North Carolina Department of Transportation	
Targets Transmitted to the Metropolitan Planning Organization(s)	**Metropolitan Planning Organization Name**	**Date Targets Transmitted**
	City of Raleigh	

Section 4. Safety Management Policy

Safety Management Policy Statement

GoRaleigh strives to provide safe, reliable, comfortable, and innovative transportation options to every member of the community. The Public Transportation Agency Safety Plan (PTASP) has been developed to integrate safety into all GoRaleigh operations. By using the procedures contained in the PTASP, GoRaleigh can continue to improve the safety and security of GoRaleigh's operation and services.

This PTASP describes the policies, procedures, and requirements to be followed by management, maintenance, and operations personnel to provide a safe environment for GoRaleigh employees, customers, and the general public. The goal of this program is to eliminate the human and fiscal cost of avoidable personal injury and vehicle accidents. This PTASP addresses all applicable requirements and standards in accordance with the FTA Public Transportation Safety Program and the National Public Transportation Safety Plan.

Each department has a responsibility under the PTASP. The Director and supervisors shall provide the continuing support necessary to achieve the PTASP objectives. A key to the success of this effort is for employees to be aware that they are accountable for safely performing the requirements of their position. The success of the program also depends on all employees actively identifying potential hazards and making a commitment to the safety of others.

GoRaleigh must be aware that decisions and actions often affect the safety of those in other operations. By following the processes described in the PTASP, GoRaleigh will continue to improve performance and the safety of the system while creating a culture of safety.

GoRaleigh's commitment is to:

- **Support** the management of safety through the provision of appropriate resources that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- **Integrate** the management of safety among the primary responsibilities of all managers and employees;
- **Clearly define** for all staff, managers, and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of GoRaleigh's safety management system;
- **Establish and operate** hazard identification and analysis, and safety risk evaluation activities--including an employee safety reporting program as a fundamental source for safety concerns and hazard identification--to eliminate or mitigate the safety risks of the consequences of hazards resulting from GoRaleigh operations or activities to a point which is consistent with an acceptable level of safety performance;

- **Ensure** that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;
- **Comply** with, and wherever possible exceed, legislative and regulatory requirements and standards;
- **Ensure** that sufficient skilled and trained human resources are available to implement safety management processes;
- **Ensure** that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills;
- **Establish and measure** safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- **Continually improve** safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and
- **Ensure** externally supplied systems and services to support operations are delivered, meeting established safety performance standards.

GoRaleigh's Goals for Safety are established as follows:

- In collaboration with the City of Raleigh, design, construct, test, and operate a transportation system that achieves an optimum level of safety, exceeding the safety performance of other transit systems of a similar size in the United States.
- Identify and evaluate, then eliminate or control hazards to employees, customers, and the public.
- Meet or exceed all government and industry occupational health and safety standards and practices.
- Maximize the safety of future operations by affecting the design and procurement processes.

The objectives of the PTASP are the means to achieving its goals. They also provide a method of evaluating the effectiveness of GoRaleigh's safety efforts. The PTASP objectives are:

- Integrate safety management and hazard control practices within each GoRaleigh department.
- Assign responsibilities for developing, updating, complying with, and enforcing safety policies, procedures, and requirements.

- Verify compliance with GoRaleigh safety policies, procedures, and requirements through performance evaluations, accident/incident trends, and internal audits.
- Investigate all accidents/incidents, including identifying and documenting the causes for the purpose of implementing corrective action to prevent a recurrence.
- Increase investigation and systematic documentation of near misses.
- Identify, analyze and resolve safety hazards in a timely manner.
- Minimize system modifications during the operational phase by establishing and utilizing safety controls at system design and procurement phases.
- Ensure that system modifications do not create new hazards.
- Train employees and supervisors on the safety components of their job functions.

GoRaleigh takes these commitments seriously as the lives of GoRaleigh riders, employees and the general public depend on GoRaleigh's ability to operate in a culture of safety.

Accountable Executive

12/02/20

Date

Safety Management Policy Communication

GoRaleigh realizes the importance of ensuring its employees and riders are aware of GoRaleigh safety management policies and procedures to effectively manage the system's day to day operations. To do this, GoRaleigh relies on several forms of effective communication.

Employees: GoRaleigh is constantly evaluating existing policies and procedures to verify their effectiveness. To do this, GoRaleigh seeks input from all staff, including other City of Raleigh departments, to determine if change is necessary based on trends, data analysis, operational changes or new assets. Several methods are used to communicate policy and/or procedure changes, including:

- Employee memorandum through paycheck, daily manifest of work orders, agency meetings
- Bulletin board notices
- Employee email notification
- Departmental meetings

GoRaleigh includes a training element for safety management policies impacting safety or service delivery and is conducted before the policy effective date. New policies and procedures are incorporated into orientation training for new employees as well.

Depending on the importance of the policy or procedure change, an acknowledgement signature is required of each employee verifying their understanding of the change.

Riders: If a rider policy is changed or added, GoRaleigh notifies riders through the following methods:

- Notice posted on vehicle and facilities including effective date and who to contact for more information
- Changes to digital rider guidance including schedules and ride guides as appropriate
- Public Meetings
- Social Media
- Any services impacted by policies changes will include outreach as required by Federal Guidance.

Authorities, Accountabilities, and Responsibilities

As mentioned in the Safety Policy Statement, the ultimate authority for the success of this PTASP falls to the Accountable Executive (AE). The Chief Safety Officer (CSO), the administration and management team, as well as employees fulfilling their commitment to safety on a day-to-day basis support the AE.

Accountable Executive (AE):

The Accountable Executive will determine, based on feedback from senior staff, the level of Safety Management System principals to maintain to ensure a safe work environment, rider experience and community safety. GoRaleigh's AE is committed to providing employees with the tools and training needed to be successful and safe in their roles with GoRaleigh. The AE will continually strive to create a culture of safety among the employees, and GoRaleigh expects each employee to play a role in maintaining a safe workplace.

GoRaleigh's AE will be responsible for developing an annual transportation budget to provide the necessary funding to support training for new hires and experienced staff while also maintaining assets in a State of Good Repair (SGR) and/or replacing it, if it is no longer able to function as originally intended.

GoRaleigh's AE has ultimate responsibility for carrying out the PTASP, responsibility for carrying out GoRaleigh's TAM Plan and control or direction over the human and capital resources needed to develop and maintain GoRaleigh's PTASP, in accordance with 49 U.S.C. 5329(d), and the agency's TAM Plan in accordance with 49 U.S.C. 5326.

The current Accountable Executive is also the Transit Manager and is responsible for implementation and changes to this Plan.

Chief Safety Officer (CSO): GoRaleigh has concluded one CSO will be sufficient to manage the day to day adherence to this Plan and, while in this role, report directly to the AE. The CSO is an adequately trained individual who has responsibility for safety and reports directly to GoRaleigh's chief executive officer. As CSO, this individual will monitor safety and security throughout the organization including sub-contractors. All departments have been notified of the CSO's role and the established reporting requirements relating to safety-related matters.

GoRaleigh's CSO will be responsible for the following:

- Developing and maintaining SMS documentation;
- Directing hazard identification and safety risk assessment;
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and Board of Directors on SMS implementation progress; and
- Planning safety management training.

Roll of Staff to Develop and Manage Safety Management Systems (SMS)

Accountable Executive

The Accountable Executive (AE), who also serves as General Manager, will work with the Chief Safety Officer (CSO) and Administrative staff to adjust the PTASP as needed based on staff feedback, trends, and data analysis. The AE is vested with the primary responsibility for the activities of the transit system and overall safety performance. The AE fulfills these responsibilities by providing the resources necessary to achieve PTASP goals and objectives by exercising the approval authority for system modifications as warranted. The AE also sets the agenda and facilitates the cooperative decision making of the Leadership Council (management team).

Chief Safety Officer (CSO)

For purposes of managing the SMS and PTASP, the CSO will report directly to the AE to determine strategy, policy, and goals for maintaining safety and security for passengers, employees, and the general public. The CSO will monitor day to day operations and work with staff to identify and mitigate risk through evaluation, feedback, and data analysis.

Supervisors

Supervisors are responsible for the safety performance of all personnel and equipment under their supervision. They are responsible for the initial investigation of all accidents and incidents, and for reporting these accidents and incidents to the Human Resources, Risk Management and Transportation Operations Department.

Employees

All GoRaleigh personnel are responsible for performing their work safely and for following established safety-related rules, procedures, and work practices. This includes reporting all accidents, incidents, and hazards to their supervisor per established requirements for the protection of themselves, co-workers, customers, facilities, and equipment.

Safety Committee, Administrative Staff

GoRaleigh Safety Committee and Administrative staff will be responsible for maintaining high standards of safety, customer service, and security. The Employee Safety Reporting Program (ESRP) will define the employees' role to identify and mitigate risk through open communication to superiors including the CSO and AE. Administrative staff will be instrumental in ensuring action is taken to reduce risk and the whole system is continuously monitored to ensure actions are effective and appropriate.

GoRaleigh staff will be involved with updates, modifications and implementation of the PTASP. Each staff member brings a valued perspective to the development of policies and procedures he or she will be expected to implement. Every opportunity will be given for employees and riders to provide input to increasing safety at GoRaleigh. Those opportunities include monthly safety meetings, annual employee meetings and training, department meetings, customer and employee surveys and an open-door policy with access to all management staff.

Employee Safety Reporting Program (ESRP)

As stated in the Safety Management Policy Statement, GoRaleigh is determined to provide a safe working environment for its employees, riders and the general public. To ensure success, GoRaleigh has developed an ESRP to enable employees to report any risk or perceived risk to a supervisor, CSO, or member of administration.

The ESRP allows each employee to report detailed information and observations whether they are a driver in service, maintenance staff, or other on-duty employee. This program dovetails with other methods currently in place to proactively identify hazards or threats. Those methods include but are not limited to the following:

- Pre/Post Trip Inspections
- Preventive Maintenance Inspections
- Employee Evaluations
- Facility Maintenance Plan
- Service Evaluation and Planning Program
- Training Program
- Rider and Public Complaint/Compliment Process
- Safety and Employee Meetings

- Incident/Accident Policies
- Safety Committee

Reporting Process

GoRaleigh has developed a Hazard Report Form used to identify and provide information about hazards observed by GoRaleigh employees while on-duty. This form identifies vital information to assist employees in determining an action to mitigate the threat or hazard. This form is not meant to replace accident forms currently being used, but instead used in conjunction with the accident forms. It is proactive reporting method to identify a perceived threat or hazard, potentially endangering employees, riders or the general public. The form serves a dual role as an incident, illness, and near miss report. The form is located in Appendix 1 of this Plan.

Effective December 31, 2020 all GoRaleigh employees will receive one hour of training on the procedures associated with the Hazard Report Form. The training will cover the following areas:

- Locations of blank Hazard Report Form
- When to use a Hazard Report Form
- Capturing critical information on the form
- Notification process depending on the hazard
- Proper assessment of the reported hazard
- Levels of likelihood of repeat
- Supervisor and CSO role in completing the form
- Follow-up process to determine effectiveness of mitigation

The following process is used as part of the ESRP.

Immediate Action Required

If you have identified a hazard which you perceive to be a risk to yourself, fellow employees, passengers, or the public you must report it immediately to the on-duty supervisor/dispatcher. Once reported you must determine if immediate action is necessary to prevent additional risk. If so, communicate to supervisor before taking action if time allows. Once action has been taken to mitigate the potential harm to yourself, others or property advise a supervisor of the results of your actions. Once you are able, complete the Loss Prevention Investigation Report with complete information and give to supervisor on-duty.

Delayed Action Required

Once a hazard has been identified, the GoRaleigh employee should assess if the hazard requires immediate action to reduce the risk of if delayed action can be taken. If the employee determines delayed action is appropriate a full report must be completed using the Loss Prevention Investigation Report and submitted to the on-duty supervisor.

Role of Supervisor

The on-duty supervisor is responsible for advising the employee on immediate action or delayed action to mitigate a hazard. The supervisor must then review the Loss Prevention Investigation Report to ensure all information is included adding additional information from their perspective. Once the form is complete it must be reviewed by the CSO to determine action necessary, investigate root cause of hazard and follow-up.

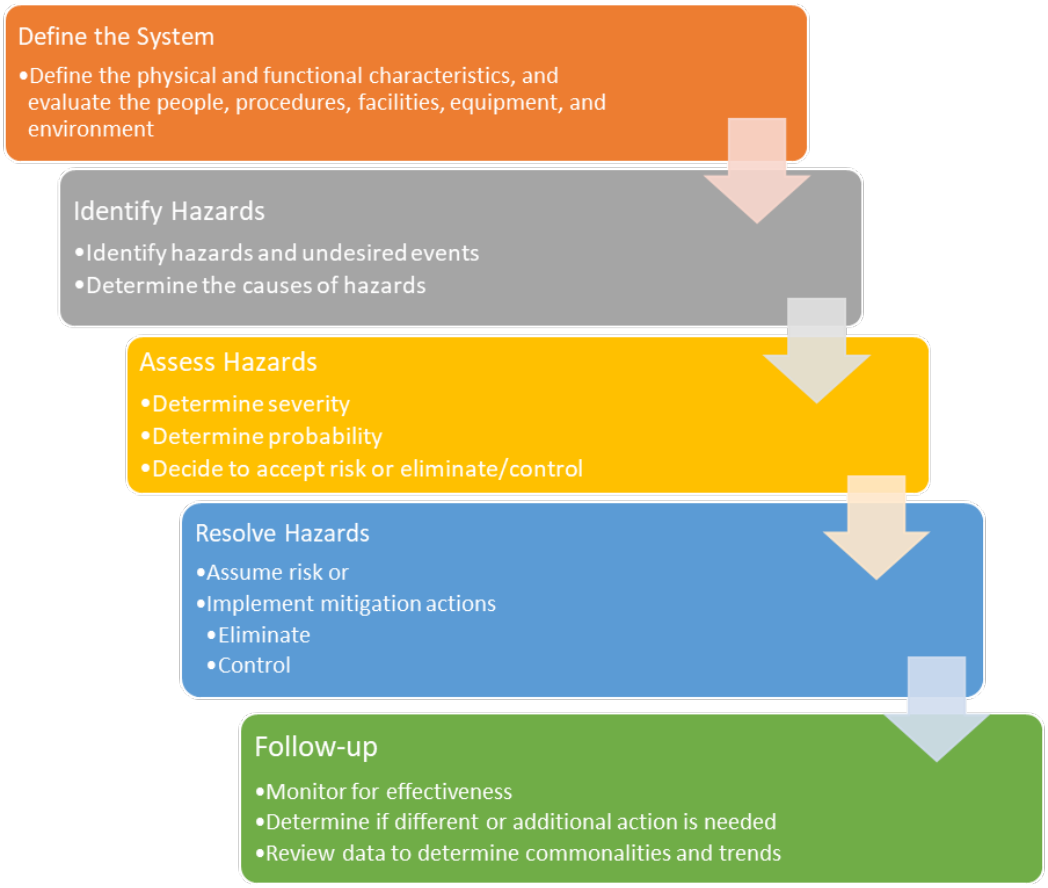
The CSO is responsible for determining the status of each hazard reported. In some cases, hazards may be identified and are not able to be resolved but actions are taken to reduce the risk of the hazard. It is GoRaleigh's goal to eliminate all identified hazards if possible. Some hazards may require continuous monitoring to ensure the hazard does not elevate to an action level.

All hazard reports will be documented and integrated into current performance measures and data collection. The CSO will track each hazard to completion and recommend policy or procedural changes if needed as a result of the hazard mitigation.

GoRaleigh Responsibility

GoRaleigh takes every hazard report seriously and investigates each one to determine if it's an isolated case, or emerging trend requiring evaluation of policies and procedures or service modifications. Employees reporting hazards will not face disciplinary action unless that employee contributed to the hazard. GoRaleigh wants to encourage all employees to report any hazard or threat they observe and help make the GoRaleigh system as safe as possible for its employees, riders, and the general public. Employees may report the hazard to their immediate supervisor or go directly to the CSO to submit and discuss their report.

The following process chart illustrates the steps taken as part of the hazard identification process through the ESRP.



Section 5. Safety Risk Management

GoRaleigh provides training to all personnel in the identification of hazards and security threat while also providing tools to enable personnel to report these risks. Once the risk has been identified GoRaleigh conducts an assessment of the risk to determine the necessary response and response time. The response may include further investigation or monitoring, action(s) to mitigate the hazard or security threat and follow-up assessment to ensure action taken is appropriate and effective.

Safety Hazard Identification:

Hazard and security threats are identified through different methods of monitoring the system. This includes system, employee and asset assessments conducted daily and on incremental basis. GoRaleigh conducts the following routine and random evaluations of the system in the following departments:

Personnel

Each GoRaleigh employee is evaluated annually to ensure they are performing their job to the expectations of the Agency. As part of their orientation process the employee is provided training and tools to perform their job while not receiving permanent status until completing 120 days of employment. During the 120 - day period, the employee is evaluated to determine if they are properly prepared to perform their job.

Additional evaluations of the employee are conducted throughout the year through spot-checks of some aspect of their job function. If through spot-check or annual evaluation it is determined the employee's performance does not meet expectations or training standards, remedial training will be provided, and additional evaluations will take place to ensure remedial training was effective.

Assets

Rolling stock, facilities and equipment are monitored through a vigorous preventive maintenance plan aimed at identifying hazards and deficiencies as part of daily and scheduled inspections. Operations and Maintenance Departments coordinate the preventive maintenance program including daily Vehicle Inspection Reports (VIR)s, incremental and annual inspections.

GoRaleigh updates the FTA required Transit Asset Management (TAM) Plan annually with data relevant to each asset to include a condition assessment, miles (with rolling stock and non-revenue vehicles) and age as to whether the asset is in a State of Good Repair (SGR). The TAM Plan allows GoRaleigh management to plan asset replacement or rehabilitation for future years.

System

As part of GoRaleigh's safety management system monitoring, the agency uses service evaluations when planning, spot-checking or responding to an event like an accident or incident. New routes are strategically developed with safety being the first priority and passenger access second. GoRaleigh route planners plan and test all routes before activating the route for revenue service. All routes are reviewed periodically to determine if environmental hazards may exist requiring modification to the route, schedule or vehicle.

All front-line staff have been trained to note any changes to service which may be considered a hazard or security threat and through the ESRP, notify their supervisors immediately or upon return to GoRaleigh depending on the severity of the hazard.

GoRaleigh identifies hazards and potential consequences from a variety of sources, including:

- Voluntary ESRP and mandatory safety reporting program;
- Results from the review of camera technology video from our vehicles;
- Meetings and workshops with employees to discuss safety concerns;
- Results of employee surveys and outreach;
- Monthly safety committee meetings with bus operators;
- Results of reports highlighting safety concerns and changes, including:
- Pre-trip and post-trip vehicle inspection reports that identify bus safety concerns to the fleet manager and safety leadership;
- Results of routine observations of the workplace by management personnel;
- Results of regular ride checks, mystery rider program, and rule compliance assessments;
- Information collected from reports and investigations of safety events; and
- Information collected from other Safety Assurance activities, including maintenance reports, vehicle inspection reports, system inspection reports, quality inspections and reports, and special studies or reviews.
- Results of condition assessments undertaken for the Transit Asset Management plan;
- Results of inspections, audits, and observations performed by Safety Department personnel;
- Review of the drawings and specifications for new or modified equipment or facilities;
- Findings or recommendations made as a result of audits, reviews, studies, or assessments from internal or external departments or agencies;
- After Action Review reports following an emergency event or exercise;
- Information from customer reports and reports of unsafe behavior from the public and law enforcement;
- Information from industry associations, manufacturers and other vendors, and oversight authorities, such as the National Transportation Safety Board and the Federal Motor Carrier Safety Administration, as well as state and local transportation agencies; and
- Information from FTA, including safety directives, bulletins, alerts, and technical assistance, as well as regulations and recommended practices. GoRaleigh's Safety

Department, SMS Committee, and subject matter experts identify hazards and consequences from these sources.

Hazard Identification Procedure

Any employee seeing something through inspection or observation they deem to be a hazard are instructed to immediately report that hazard to the immediate supervisor regardless of the perceived level of threat. Depending on the situation, either the immediate supervisor or the employee will complete a Hazard Report Form and submit it to the CSO.

If the hazard requires immediate mitigation, the employee will be instructed on steps to take to reduce the risk which may or may not alleviate the risk completely. Additional actions may be taken once the immediate risk mitigation has been taken. Some hazards may not pose an immediate risk but are still reported and the CSO will be responsible for risk assessment, investigation and mitigation strategy.

In some cases, a passenger or member of the general public may call GoRaleigh with a complaint about a front-line employee which may rise to the level of hazardous behavior or actions. GoRaleigh currently documents all customer complaints/compliments and takes appropriate action to investigate any complaints. Complaints deemed hazardous will trigger immediate action by on-duty supervisors.

Hazard Report Forms will be located on all vehicles along with standard safety kits for accident and incident reporting, with all Customer Service Representatives (CSR)'s, Dispatch, Operations, and Maintenance Departments.

The Hazard Report Form will require the employee to briefly describe the hazard noting date, time of day, location, and other pertinent information. The form includes a section for the CSO or immediate supervisor to document immediate action taken to reduce risk, a risk assessment chart prioritizing the risk, and a section for additional follow-up action. All forms will be processed by the CSO and summarized periodically for trend analysis and include in safety performance measures. GoRaleigh utilizes information provided by the FTA in order to remain current on hazard identification methods and responses.

> 49 CFR part 673.5
>
> *Hazard* means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

Safety Risk Assessment

GoRaleigh assesses safety risk associated with identified safety hazards and their consequences by assessing the likelihood and severity of the consequences of hazards, including existing

mitigations, and prioritizing hazards based on safety risk. The CSO, with support from Safety Department staff, manages GoRaleigh's safety risk assessment activities.

In some instances, safety risk assessment may be performed by other GoRaleigh departments, Transdev or contractors, with the results reported to the GoRaleigh Safety Department for incorporation into the Safety Risk Register module of GoRaleigh's safety information system. To conduct the assessment, the CSO may assemble a small team of subject matter experts based on their knowledge of the factors and potential consequences of a hazard and its potential consequence(s) under assessment. Additionally, GoRaleigh may use outside resources with specialized expertise in the safety risk assessment process or a transit technical discipline.

GoRaleigh's safety risk assessment process has five steps:
• Step 1: Collecting Information;
• Step 2: Assessing Severity;
• Step 3: Assessing Likelihood;
• Step 4: Determining the Safety Risk Index; and
• Step 5: Documenting Results.

Each step is summarized below.

Step 1: Collecting Information

GoRaleigh's CSO collects information on identified hazards and its potential consequence(s). Typical information collection activities include:

- Reviewing GoRaleigh's safety information system and records to identify information relevant to the hazard and its potential consequence(s);
- Interviewing employees and contractors that work in the area or discipline where the hazard and potential consequence(s) have been identified;
- Conducting a walkthrough of the affected area or system, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary;
- Conducting interviews with subject matter experts to gather potentially relevant information on the hazard and potential consequence(s);
- Reviewing any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.);
- Contacting other departments or agencies that may have association with or technical knowledge relevant to the hazard or its potential consequence(s);
- Reviewing any past reported hazards of a similar nature;
- Reviewing information provided by FTA or an oversight authority; and
- Evaluating tasks and/or processes associated with the hazard and its potential consequence(s).

Step 2: Assessing Severity

The CSO, working with a small team, if one is assigned, will assess the severity of impact of the worst credible potential consequence(s) of the hazard if it/they occurred, taking into account existing mitigations. This includes impact to people, systems, equipment, and the environment and uses four severity levels:

1. **Catastrophic** - Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding $10 million

2. **Critical** - Could result in one or more of the following: permanent partial disability, injuries or occupational illness that may result in hospitalization of at least three individuals, reversible significant environmental impact, or monetary loss equal to or exceeding $1 million but less than $10 million.

3. **Marginal** - Could result in one or more of the following: injury or occupational illness to an individual resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding $100,000 but less than $1 million.

4. **Negligible** - Could result in one or more of the following: injury or occupational illness to an individual not resulting in a lost workday, minimal environmental impact, or monetary loss less than $100,000.

Step 3: Assessing Likelihood

The CSO, working with a small team, if one is assigned, will assess the likelihood of the worst credible potential consequence(s) of the hazard taking into account existing mitigations. The table includes six likelihood levels:

A. **Frequent** – Continually experienced, very likely to occur

B. **Probable** – Will frequently occur

C. **Occasional** – Will occur several times

D. **Remote** – Unlikely to occur but reasonably expected to occur

E. **Improbable** – Unlikely to occur but possible

F. **Eliminated** – Will not occur

Step 4: Determining the Safety Risk Index

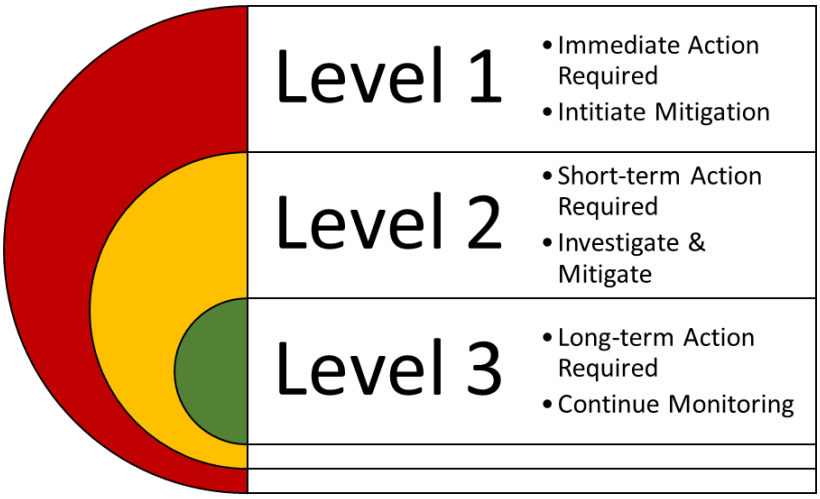
All GoRaleigh staff have been provided with training appropriate for their positions within the organization. GoRaleigh expects its employees to respond to hazards or threats with professional judgement as sometimes there might not be time to contact a supervisor to prevent an emergency event. In cases where the hazard can be reported without immediate risk, the employee will make an initial assessment of the risk as part of their report.

Once received by the CSO, the initial risk assessment may be amended requiring immediate, short, or long-term response.

Level 1 - Immediate: A deficiency, threat or hazard requiring immediate attention to mitigate risk either temporarily until further action can be taken or complete mitigation.

Level 2 - Short Term: Action is needed within seven days to mitigate an identified deficiency, threat or hazard. The deficiency, threat or hazard does not pose immediate danger but if no action is taken could elevate to an Immediate level risk.

Level 3 - Long Term: A deficiency, threat or hazard has been identified but does not pose a threat currently but could at a later time. Continued monitoring and awareness are required.



The CSO in coordination with staff will investigate each identified hazard, assess the risk, and take appropriate action to mitigate the risk. Additional mitigation may be needed based on follow-up monitoring to the action taken.

Step 5: Documenting Results

The CSO, or designee, will document enter required information including the hazard, hazard type, identification source and date, and the hazard's consequences, including the worst credible potential consequence(s), and the existing mitigations (hard and soft) that address the worst credible potential consequence(s), assessments regarding severity and likelihood of the worst credible potential

consequence(s), and any related or supporting documentation. Required management reviews and approvals will also be documented.

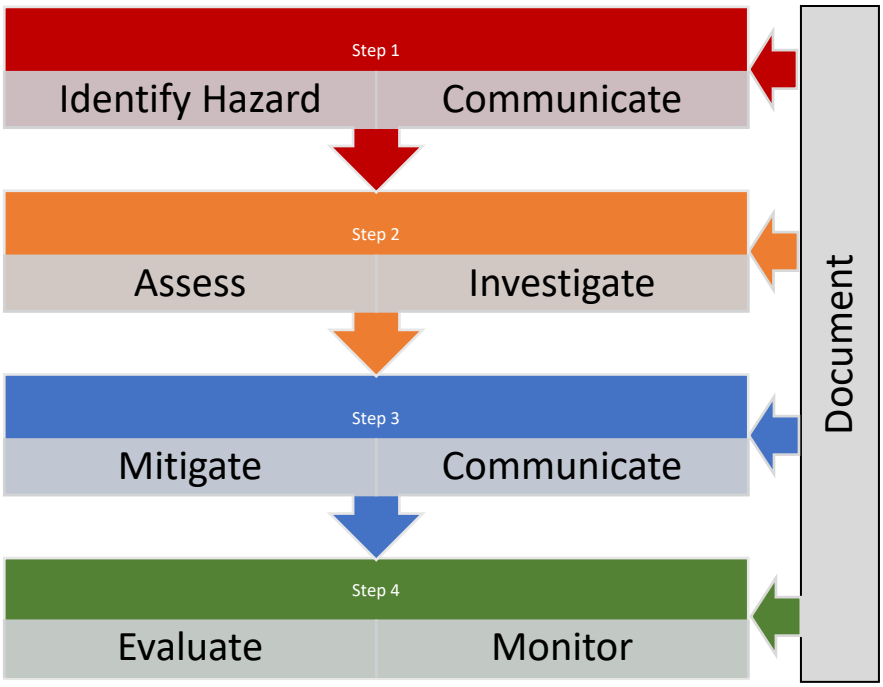
Safety Risk Mitigation

In response to all identified and assessed hazards, GoRaleigh will take steps to mitigate the hazard and reduce or eliminate the risk to employees, riders, and public. Mitigation strategies will be dependent on results of investigation into the elements contributing to the risks. The investigation may include more than one department and may include interviews outside of the transit system.

Actions to mitigate risk will include all employees, riders, and public who may be impacted by either the hazard or the actions to reduce or alleviate the risk. GoRaleigh will communicate actions to appropriate staff through methods appropriate risk assessment. In some cases, immediate communication through two-way communications (dispatch system, text burst, email, or web alert) may be necessary. In other cases, bulletin board notices or memorandum posting may be appropriate.

Once a risk mitigation strategy has been implemented GoRaleigh will monitor the actions to determine if full mitigation is possible and if not, is additional action necessary to alleviate the risk or is stepped up monitoring necessary. Some risks may not be completely mitigated but awareness to the risk will is a top priority.

All actions taken to mitigate risk will be documented and linked to the initial deficiency, threat, or hazard identification step.



Section 6. Safety Performance Monitoring and Measurement

Safety performance monitoring and measurement involves the continual monitoring of the transit agency's activities to understand safety performance. Through these efforts, GoRaleigh can determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing Safety Management Systems (SMS).

GoRaleigh is constantly striving to maintain the highest level of safety through its monitoring methods to include adherence to policies and procedures, safety and maintenance plans, and system and employee evaluation processes. These methods allow GoRaleigh to determine the need to make changes to improve policies, employee training and service delivery.

Maintenance

Maintenance Standards and Procedures**:** Standards and procedures are included in the GoRaleigh Transit Maintenance Plan. In general, maintenance procedures are designed to ensure that the maintenance recommendations of the manufacturer are met, maximum efficiency in performance and operation is obtained, and maximum bus life and condition are maintained. Daily bus inspections, an active Preventive Maintenance Program, contractor oversight, and careful monitoring are included in procedures to ensure the safety of buses and adequacy of the Fleet Maintenance Plan.

Operator Inspections**.** All operators are required to perform a pre-trip and post-trip inspection to ensure that the vehicle is safe and in good operating condition. If any defects are noted by the operator, a Defect Slip is completed and, depending on the severity and extent of the defect, the vehicle may be repaired or taken out of service until a repair can be made. In the case of a defect that develops or is noted once a vehicle is in service, the operator is required to communicate the problem to Operations, who will then notify Maintenance.

Daily Servicing and Inspections**.** The GoRaleigh Maintenance Department inspects, and services buses used in revenue service each day. The buses are fueled and washed, all fluids are checked, tires and lugs are checked, and the vehicle is inspected for any leaks or unusual noises. The Cleaners clean the bus interiors each day. When a defect is noted, it is reported to the Lead Mechanic or Supervisor on shift so that evaluation and, if necessary, a repair can be conducted.

Mileage-Based Maintenance Inspections**.** All buses receive preventive maintenance inspections (PMI) at designated mileage intervals. Mileages are determined by vehicle and subcomponent manufacturers and real-world experience. Oil sampling is performed periodically for both engines and transmissions. A description of the schedule and type of inspection and service performed for each bus series is included in the GoRaleigh Maintenance Plan.

Maintenance Inspections of Contracted Providers**.** GoRaleigh contracts for the operation and maintenance of transit services. The contractor must ensure that all passenger vehicles and associated equipment are maintained in proper working condition. The contractor is required to implement a maintenance and safety program that includes a preventive maintenance schedule that complies with FTA requirements for preventive maintenance for vehicles. Further, contractors are required to maintain comprehensive maintenance records on each vehicle and send the information to GoRaleigh. In addition, on-site inspections are conducted at least quarterly to verify vehicle condition.

Operations

Facility Monitoring

Formal facility inspections of all GoRaleigh facilities and grounds are conducted by GoRaleigh Maintenance and Facilities quarterly using a facility checklist. The purpose of the inspections is to identify any unsafe or unhealthy conditions which may exist, and that may require maintenance or modification. Each facility is also visually inspected for compliance with OSHA and local fire codes.

Any guests to GoRaleigh's administration facility must check in through a secured process requiring check-in and validation of visit purpose. Employees are trained on procedures for visitors in the workplace and facility access is limited through security systems.

Frequency

The Safety Committee conducts its safety inspections quarterly. Mechanics and Facilities Maintenance employees look for potential hazards with equipment whenever they are using that equipment. The vehicle hoists, chain pulls, and cranes in the vehicle maintenance shop are inspected annually by contractors. Preventive maintenance of equipment and facilities is performed in accordance with the manufacturer's recommended practice. Hazards are also identified by analyzing work accident trends, through Hazard Report Forms submitted by employees. Forms are used by employees to report safety concerns and to make safety recommendations.

Reporting

When deficiencies are noted during quarterly inspections, they are documented and reported to the director of the department in which the safety hazard is located. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor or CSO. Hazard Report Forms are routed to the department, Chief Safety Officer or director best equipped to evaluate the concern and, when necessary, propose a resolution.

Hazard Resolution

The primary purpose of facility inspections and hazard reporting is to identify conditions that could lead to accidents and losses. In view of this, it is crucial that all departments and employees be involved in the Facility Inspection and the Hazard Identification and Resolution processes. Hazard resolution is related to the severity of the hazard and the probability and severity of a negative consequence of the hazard.

Follow-up

Corrective action for a confirmed hazard that has been identified by any established process is the responsibility of the director of the department area in which the hazard exists or the CSO. This includes arranging for the services of other GoRaleigh departments or outside parties, as necessary, to eliminate or control the hazard.

Documentation

Hazards that have been identified, proposed resolutions, and corrective actions are recorded in hard copy by the Safety Committee and maintained by CSO. All front-line personnel are responsible for monitoring safety and security as part of their respective positions. If a hazard is identified through

observation or interaction with customers or the general public, it is reported to the immediate supervisor as well as following GoRaleigh's hazard reporting process.

Employee Hazard Reporting

Loss Reports

Employees can fill out a Hazard Report Form which is turned into the effected department and the CSO, talk with a supervisor or the Director of Operations. They can also contact a Safety Committee member which is comprised of union and administrative members. Depending on the severity/risk of the hazard identified, immediate action may be taken, or the input will be brought to the Safety Committee for discussion. Feedback will be provided to the employee on what action, if any, will be taken. All employees follow the Employee Hazard Reporting Program Policy.

Route/Operations Safety

Employees can fill out a Site Report Form or discuss suggestions for making the system/route safer. GoRaleigh encourages employees to be advocates for safety while also suggesting methods of increasing performance. Management has an open-door policy and makes clear the importance of employee feedback; positive and negative.

Safety Events

Accident and Incident Reporting Process

All accidents and loss incidents are to be investigated. GoRaleigh's safe driving standards require professional safe performance of all operators. To ensure better than average safety performance, GoRaleigh employs Transdev definitions in addition to the Smith System Defensive Driving guidelines to determine if a collision or onboard incident could have been prevented. All personnel operating any GoRaleigh vehicle are held to this standard.

The GoRaleigh Polices and Procedures Manual includes procedures and responsibilities for accident/incident investigation. The combined manuals establish procedures for accident notification, response, and investigation.

GoRaleigh Supervisors and Dispatch coordinate with outside law enforcement agencies if they investigate an event. The Safety staff also coordinates with outside insurance providers and provides support among GoRaleigh departments and independent investigation to manage GoRaleigh liability and claims.

Most accidents and incidents involving GoRaleigh are relatively minor in severity and are investigated by Operations Road Supervisors and the Safety Department. Since most accidents involve buses, this section focuses on bus accidents. However, all non-bus accidents and incidents are also investigated.

Notification

Bus Operators are to notify the dispatch anytime an GoRaleigh vehicle might have been damaged, anytime an GoRaleigh vehicle and another vehicle come into contact, or anytime an instance occurs in where a customer may have been injured. An Operations Supervisor will be directed to the scene. Police and ambulance will be dispatched, if necessary.

At-Scene Procedures

Bus Operators will adhere to the following procedures defined in the GoRaleigh Policy and Procedure Manual:

- Assist the injured.
- If blocking traffic, set out reflective triangles.
- Do not move the unit unless required to do so by an Operations Supervisor, fire or police order, or impending danger from traffic.
- Obtain names, addresses, and phone numbers of all witnesses.
- Have all passengers complete courtesy cards.

Operations Supervisors are responsible for conducting on-scene investigations of accidents and incidents. Depending on the severity and the nature of the event, various mechanisms will be used for preserving transient evidence. These may include digital photography, bus video, field sketches, interviews, and observations.

Investigation

An attempt is made to complete the investigation of most accidents within three days. Operations Supervisors are required to complete an Accident/Incident Report which includes a statement from the operator(s) involved. The Supervisor is required to file the report as a hard copy and attach all relevant media for use by the Director of Operations and the CSO.

A Report of Injury Form must be completed if an employee suffers an injury or illness as a result of an accident or incident.

Accident Review Process

Accidents and Incidents are classified as Preventable or Non-Preventable.

Preventable accidents are defined as those accidents that could have been reasonably avoided if the operator had followed all defensive driving techniques as established by GoRaleigh Operations Procedures and Policies.

After reviewing all related documents and evidence, the investigating Operations Supervisor makes an independent preliminary determination of whether the accident was preventable.

The accident determination is made by the Safety Manager. If contested, the determination is review by the Safety Committee and a final determination is rendered. The committee meets a minimum of once monthly and is comprised of at least one bus operator, a Union-Elected Bus Operator, a Maintenance Supervisor, a Transit Operations Supervisor, and the Administrative Representative to take minutes.

The Committee follows all policies, procedures, and definitions as established in the GoRaleigh Policies and Procedures Book. Examples of investigations may include reviews of accident and injury reports, vehicle condition reports, witness statements, employee interviews, accident scene sketches, bus videos, physical evidence, brake test reports, training manuals, and accident site visits. Employees who are not in agreement with the Committee's determination can appeal directly to the Committee by providing additional evidence and testimony. If the employee is not in agreement with the appeal results, he or she can make a second and final appeal to the General Manager. The General Manager may review all relevant information, interview the employee making the appeal, interview Safety Committee members, and confer with any available person or resource he or she considers valuable to his or her deliberation.

Hazard Resolution

The primary purpose of the Accident Investigation process is to determine the cause(s) of accidents so that they may be prevented or mitigated in the future. To this end, it is crucial that all relevant departments be appropriately involved in the Process. A serious attempt is made to use lessons learned through the investigatory process to incorporate hazard resolutions into future procedures, designs, construction, modifications, training, and procurements.

Follow-up

Follow-up in the form of corrective actions is the responsibility of the employee's director. The responsibility may be delegated to the employee's manager, supervisor or CSO.

Any disciplinary action will be assessed using the Collective Bargaining Agreement procedures and/or the Administrative Handbook. Disciplinary consequences for accidents may include warnings, suspensions, and discharge.

Training will be provided, in most cases, for employees who have been involved in any preventable accidents. Training and re-training are not disciplinary in nature.

Internal Reporting

The Operations Supervisor is responsible for ensuring that all accident reports are completed and filed with the Safety Department. Human Resources and Safety will advise on the history of the employee if a pattern of safety events is evident.

Documentation

The CSO/Safety Department will maintain the accident investigation documentation.

Performance Measures

Through a series of performance measures relative to operations, maintenance, and safety, GoRaleigh can monitor the system's safety by identifying trends and gaps in policies, procedures, training, and monitoring efforts. The following performance measures are on a daily, monthly, and quarterly basis.

Maintenance

- **Preventive Maintenance On-time Inspection Percentage** – determines the effectiveness of the maintenance department to ensure all inspections are conducted per manufacturing and Go Raleigh Transit mileage intervals.
- **Vehicles Removed from Revenue Service** – tracks vehicles removed from service due to a mechanical defect developed while in service requiring immediate service either on-site of failure or once returned to the facility.
- **Annual Vehicle Condition Assessment** – through annual inspection, determines on a scale of 1-5 the overall condition of the asset. This performance measure is also used in annual updates of Go Raleigh Transit Asset Management Plan.

Rating	Condition	Description
5	Excellent	No visible defects, new or near new condition, may still be under warranty if applicable
4	Good	Good condition, but no longer new, may be slightly defective or deteriorated, but is overall functional
3	Adequate	Moderately deteriorated or defective; but has not exceeded useful life
2	Marginal	Defective or deteriorated in need of replacement; exceeded useful life
1	Poor	Critically damaged or in need of immediate repair; well past useful life

Operations

- **Customer Complaints Per Month** – tracks all customer complaints to identify areas of deficiency with vehicle, driver or other GoRaleigh areas. Safety-related complaints are immediately routed to a supervisor on-duty or the CSO for investigation mitigation and response. Complaints may be a result of phone calls, website or GoRaleigh public forums.
- **On-time Performance** – serves as an indicator to issues with time management, environmental factors, scheduling, and vehicle and driver performance.
- **On-board Surveys** – conducted annually, allow GoRaleigh to receive rider feedback about bus operator performance, customer service, and vehicle safety.

Safety

- **Safety Performance Measure: Fatalities** (total number of reportable fatalities and rate per total vehicle revenue miles by mode)
- **Safety Performance Measure: Injuries** (total number of reportable injuries and rate per total vehicle revenue miles by mode)
- **Safety Performance Measure: Safety Events** (total number of reportable events and rate per total vehicle revenue miles by mode)

Monitoring Safety Risk Mitigations

GoRaleigh monitors safety risk mitigations to determine if they may be ineffective, inappropriate, or not implemented as intended. GoRaleigh Supervisors, Managers and subject matter experts, working in conjunction with GoRaleigh's Safety Department, develop mitigation monitoring plans for mitigations implemented through GoRaleigh's SRM process. The SMS Committee approves mitigation monitoring plans and track them through GoRaleigh's safety information system. Mitigations found to be ineffective, inappropriate or not implemented, as intended, must go through the SRM process. The Safety Department oversees and tracks the assignment of responsibilities and timelines for implementing new mitigations and eliminating mitigations that are no longer necessary or effective.

7. Safety Promotion

Operator Selection

Hiring Practices

Selecting applicants best suited to excel at the Bus Operator job requirements is critical to safe transit operations. The transit Bus Operator is directly responsible for the safety of not only the passengers, but also the pedestrians, bicyclists, drivers, and all others who share the road with the transit vehicle. GoRaleigh's hiring process includes the following components:

Applications

Applicants are sought through postings in traditional and culturally diverse media, referrals from current employees, posted in the local newspaper and on the Transdev website and applications filed by prospective candidates when there are no positions available. The applications are screened by key personnel in Human Resources and Transit Operations.

Interview

After application reviews, applicants are then interviewed by the Director of Operations or Assistant Director of Operations and HR or another administrative staff person. The interview process is designed to evaluate a candidate's strengths in customer service, the ability to simultaneous perform tasks, conflict resolution, and the ability to perform well under temporal and interpersonal pressure.

Driving Record

To be eligible for hire, a candidate must submit an acceptable driving record dating back five years. This establishes 25 years minimum age requirement for new hire Bus Operators.

Licensing

To be eligible for hire, a candidate must possess or be able to earn a CDL with a Passenger Endorsement and no Air Brake restriction.

Criminal Background Check

To be eligible for hire, a candidate must submit to a Criminal Background Check. The results must meet all statutory and GoRaleigh standards for the Bus Operator position.

Drug Testing

To be eligible for hire, a candidate must produce a negative result for a pre-employment drug test.

Physical Capacities Testing

To be eligible for hire, a candidate must pass a position-specific physical capacities test including but not limited to DOT Medical Certification.

Training

There are formal training programs for Bus Operators, Maintenance employees and Operations employees. These include training classes, manuals, GoRaleigh Standard Operating Procedures, and on-the-job training.

The safety component of training is designed to make employees aware of the hazards associated with their jobs and the appropriate methods for controlling these hazards. The training is intended to motivate employees to work safely. Trainings fall into three main categories: (1) Initial, (2) Periodic, and (3) Remedial or Refresher.

Initial Bus Operator Training

New Bus Operators receive an intensive training course that covers every aspect of their new job. This training consists of a classroom portion, a closed course portion, a daily driving/behind-the-wheel (BTW) portion, a cadetting portion and a final evaluation conducted by a qualified trainer. The training includes, but is not limited to, the following areas:

- Smith System
- Orientation to GoRaleigh Bus System
- Basic and Advanced Bus Maneuvers
- Service Stops
- GoRaleigh/Transdev Policies and Procedures
- Customer Service and Communication skills
- Securement Procedures
- Emergency Management
- Personal Safety
- Health/Injury Prevention

- Stress Management
- CDL Preparation
- On-route Training
- Vehicle Orientation of all Vehicles

Following successful completion of classroom and closed course requirements, the trainee shall complete Behind the Wheel (BTW) training. At this stage, the student will drive the bus in real life scenarios and will gain experience on some GoRaleigh routes. Each day the student receives a full review and debriefing from his or her instructor. Instructors communicate among one another regarding where additional training for new operators is required. Student rotation among the Operator Instructor group provides each student with experience across a variety of routes, vehicles, times of day, instructional styles, and driving conditions.

After the initial training, new Bus Operators receive additional support and training, including:

- Behind the Wheel Evaluations at the following intervals: 30 days, 60 days, 90 days, and one year. Evaluations will continue to be conducted annually after the first year.
- Fall/Winter Bad Weather: Driving and Defensive Driving Course (DDC)
- Annual Refresher Training
- Five-Year Bus Operators are invited to become secondary mentors to new Bus Operators

Annual Training for All Bus Operators

Every year, each Bus Operator receives one full day of refresher and topical training. The training addresses, but is not limited to, the following topics:

- Fatigue Awareness
- Customer Service and Dealing with Difficult People
- Resolving Conflict
- Harassment
- Effectively Dealing with People of Differing Ages
- Proper Securement of Mobility Devices
- Defensive Driving Course
- Bloodborne Pathogens
- Safety/Security Update
- Injury Prevention

- Accessible Service Sensitivity

Partial-day trainings are also scheduled on safe winter driving and whenever warranted by the addition of new equipment or a change in configuration. These training may be incorporated into monthly Safety Meetings.

Initial Operation Supervisor Training

Transit Operations Supervisors typically begin their career path as Bus Operators who first work in the position of Temporary Supervisor. A Temporary Supervisor performs many functions of the full supervisory position and receives training in, but not limited to, the following areas:

- Drug & Alcohol (Policy and procedures for all types of FTA-mandated testing)
- Accident Investigation (based on the TSI model)
- Emergency Procedures
- Security Procedures
- Blood Borne Pathogens
- Data Entry and Recordkeeping
- Harassment
- Cultural Diversity
- Coaching/Criticism/Discipline
- Dispatch Operations
- Field Operations
- Conflict Resolution

In addition to their initial training, all Transit Operations Supervisors receive topical training annually.

Injury and Illness Prevention Training

Injury and Illness Prevention Training is directed toward achieving a safe working environment for all employees and reducing the chance of occupational-related injuries and illnesses. Most of the training targets employees working in the Maintenance and Facilities Maintenance Departments because these employees have the greatest exposure to occupational hazards. The program is based on applicable Federal, State, and local safety codes and regulations. Some areas addressed in training include:

- Handling Hazardous Materials (Right to Know)
- Slips, Trips, and Falls
- Personal Protection Equipment
- Material Safety Data Sheets (MSDS) and Labels

- First Aid
- Forklift Safety
- Bloodborne Pathogens
- Hazardous Materials Storage
- Strains and Sprains
- Fall Protection
- Confined Space Program
- Crane Operation
- Ergonomics
- Hazard Communication Program

Emergency Response Planning and Coordination

Details are contained in the GoRaleigh Emergency Action Plan and Evacuation Request Procedures.

Communication of Safety and Safety Performance Information

GoRaleigh actively encourages the open sharing of information on all safety issues throughout our organization. To ensure effective communication throughout the agency, GoRaleigh has established formal processes and approaches, including:

Distribution of safety and safety performance information.

The communication of safety performance information follows the top-down, agency-wide model of the agency's SMS. The CSO is responsible for reporting on the agency's safety performance to the Accountable Executive. These reports may include, but are not limited to, performance relative to the agency's safety performance targets, updates related to mitigation monitoring plans and corrective action plans, and unusual events. In accordance with guidance distributed by the Chief Safety Officer, leadership throughout the agency (including executives, directors, managers, and supervisors) are responsible for communicating safety performance information with their teams. The Safety Department is responsible for using the safety information system to develop regular status reports on safety risk mitigations and open corrective actions for distribution to the SMS Committee for discussion. The Safety Department also issues quarterly reports on safety performance and progress in meeting the safety objectives.

Communication of information on hazards and safety risk relevant to employees' roles and responsibilities throughout the agency.

As part of new-hire training, GoRaleigh distributes safety policies and procedures, included in the GoRaleigh Employee Handbook, to all employees. GoRaleigh provides training on these policies and procedures and discusses them during safety talks between supervisors and bus operators and vehicle technicians. For newly emerging safety issues or safety events at the agency, GoRaleigh's CSO issues bulletins or messages to employees that are reinforced by supervisors in one-on-one or group

discussions with employees. GoRaleigh's Training Department also develops materials and courses to explain the rationale behind changes to policies, procedures, and work instruction that address hazards and safety risk relevant to employees' roles and responsibilities. The Safety Department works with GoRaleigh's executive and management teams (representing all appropriate functions) to define specific, safety-related information that GoRaleigh needs to communicate to different employee groups. GoRaleigh also uses multiple approaches to communicate pertinent safety information to the Board of Directors, management, and individual employees across all GoRaleigh's functions, as appropriate.

Explaining actions taken in response to employee reporting.

GoRaleigh provides targeted communications to inform employees of safety actions taken in response to reports submitted through the ESRP, such as newsletters, handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors. The Safety Department works with each operating function to ensure that all SMS and safety communication-related activities take place as scheduled. The Safety Department also maintains documentation of communication processes and procedures and records of safety communications.

System Modification Design Review and Approval

General Process

The GoRaleigh bus system is regularly modified in response to operational experience, the addition of new types of service, and changes in service design and levels. GoRaleigh's philosophy is to use appropriate new technologies to benefit the environment and the community it serves. The challenge is to review any proposed modification adequately before it is approved. Any proposed modification should be evaluated to ensure it is compatible with existing systems and does not introduce new hazards to the system or reduce the effectiveness of existing hazard controls.

Equipment modifications may be proposed by any employee of any department that uses the equipment. Changes may also occur from an analysis of reliability performance, historical data, and available improvements in equipment design and components.

Modification Design Review

A review of any modification in equipment design shall be made by the director and managers of the department responsible for the equipment. It is an informal practice to include Human Resources and Operations in the review of any change that might affect safety. The impact on the safety of all designs and specifications should be identified and evaluated before the change is approved. Some of the areas to be considered include but are not limited to:

- Hazardous Materials (handling and use)
- Motor Vehicle Safety
- Human Factor
- Occupational Health and Safety

- Materials Compatibility
- Fire Protection
- Lighting
- Braking systems
- Mirrors
- Warning Devices

Modifications must not be made before it is determined how they might affect the safety of the system, or any other systems. Other departments may evaluate a proposed change to determine its compatibility with other systems (e.g., hoists, fueling systems, communications systems). The evaluation may also include a review of applicable regulations, such as the Federal Motor Vehicle Safety Standards and Regulations and the U.S. Department of Labor's Occupational Safety and Health Act.

Testing may also be performed to evaluate the safety of a proposed modification. The testing of small changes may be minimal. For substantial modifications, extensive field testing, mock-ups, and structural evaluations may be employed.

Modification Design Approval

Final approval is generally made by either the General Manager or the Director of Maintenance. When modifications are made by a bus manufacturer, the Director of Maintenance works with the manufacturer, and contractual changes may be made. If changes are substantial, additional training will be provided for maintenance and operation staff.

Monitoring

Once a modification is put in place, feedback from the operating department is solicited to evaluate the performance of the modification. Unsolicited input from the operating department and its employees (end users) is also encouraged. Depending on the nature of the modification, Human Resources, and the Safety Department/Committee may be involved for input.

Documentation

The Maintenance Department is responsible for documenting any vehicle modifications. Facilities Services is responsible for documenting any modifications made to a facility. Documentation may involve changing diagrams, schematics, manuals, service bulletins, service intervals, standard operating procedures, and Material Safety Data Sheets. Maintenance Supervisors are responsible for updating Safety Data Sheets based on input from product manufacturers.

Routes

Route modifications are designed by the City of Raleigh Transit Planning Department. Planning may use a current Bus Operator to test routing and bus stop placement. This experience-based, real-world process is designed to protect the safety of the transit bus, transit passengers, other vehicles, and pedestrians.

The Planning Department informs the Operations Department of any proposed route modifications. The Planning Department can request that the Safety Committee evaluate a specific proposal, or the Committee can choose to evaluate any proposed modifications.

Transit operations management may request a route modification it believes will improve operations. It may also choose to evaluate a modification that has been proposed by another department. Input from individual Bus Operators is encouraged through the Hazard Report Form, direct communication, and periodic surveying of Operators conducted by Service Planners.

Finally, the Planning Department maintains a cooperative working relationship with the appropriate planning and road departments of all municipal levels of government within which GoRaleigh operates.

Additional Information

This PTASP was developed from information in other GoRaleigh/Transdev documents, policies and procedures and manuals. Those documents are listed below:

1) Emergency Action Plan

2) Preventative Maintenance Plan

3) Drug and Alcohol Policy

4) Security Plan

5) Continuity of Operations Plan (COOP)

Acronyms

Acronym	Word or Phrase
AE	Accountable Executive
ASP	Asset Management Plan
BTW	Behind the Wheel
CDL	Commercial Drivers' License
COOP	Continuity of Operations Plan
CSO	Chief Safety Officer
DDC	Defensive Driving Course
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
MSDS	Materials Safety Data Sheets
NCDOT	North Carolina Department of Transportation
PTASP	Public Transportation Agency Safety Plan
SGR	State of Good Repair
SMS	Safety Management System
TAM	Transit Asset Management
TSI	Transit Safety Institute
VRM	Vehicle Revenue Miles

Definitions

Part 673 Definitions of Terms Used in the Safety Plan

GoRaleigh incorporates FTA's definitions from 49 CFR § 673.5 of the Public Transportation Agency Safety Plan regulation.

• **Accident** means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

• **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

• **Agency Safety Plan** means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.

• **Chief Safety Officer** means an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A Chief Safety Officer may not serve in other operational or maintenance capacities, unless the Chief Safety Officer is employed by a transit agency that is a small public transportation provider as defined in Part 673, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

• **Equivalent Authority** means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Agency Safety Plan.

• **Event** means any Accident, Incident, or Occurrence.

• **Hazard** means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

• **Incident** means an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

• **Investigation** means the process of determining the causal and contributing factors of an accident, incident, or hazard for the purpose of preventing recurrence and mitigating risk.

• **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.

• **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

• **Operator of a public transportation system** means a provider of public transportation as defined under 49 U.S.C. 5302(14).

• **Performance measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

• **Performance target** means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.

• **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.

• Risk mitigation means a method or methods to eliminate or reduce the effects of hazards.

• **Safety Assurance** means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

• **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

• **Safety Management System (SMS)** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

• **Safety Management System (SMS) Executive** means a Chief Safety Officer or an equivalent.

• **Safety performance target** means a performance target related to safety management activities.

• **Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

• **Safety risk assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

• **Safety Risk Management (SRM)** means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

• **Serious injury** means any injury which: (1) requires hospitalization for more than 48 hours, commencing within 7 days from the date when the injury was received; (2) results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) causes severe hemorrhages, nerve, muscle, or tendon damage; (4) involves any internal organ; or (5) involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

• **State** means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

• **Transit agency** means an operator of a public transportation system.

• **Transit Asset Management Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR Part 625.

Appendix 1

APPENDIX M
Preparedness & Prevention Plan

TRANSDEV

EMERGENCY ACTION PLAN

GoRaleigh
4104 Poole Road
Raleigh, NC 27610

Prepared for:
Marie Parker
General Manager

Prepared by:
Antonio Jenkins
Assistant Director of Maintenance

July 2020

PREPAREDNESS & PREVENTION PLAN

TABLE OF CONTENTS

APPENDICES

PURPOSE OF THE PREPAREDNESS & PREVENTION PLAN

GENERAL PURPOSE

A written Preparedness & Prevention Plan is required at this facility. The purpose of this plan is to provide for the safety of the employees, meet emergency preparedness regulations requirements and minimize the effect of any emergency as it relates to this facility at:

4104 Poole Road
Street Address

Raleigh — North Carolina
City — State

and

GoRaleigh Station

214 S. Blount St.
Street Address

Raleigh — North Carolina
City — State

The Preparedness & Prevention Plan following this summary was prepared for use by management, emergency response personnel and all employees. All employees must be familiar with their role(s) related to this plan. Any changes, additions, or deletions must be made with the approval of:

Antonio Jenkins
Name of Preparedness & Prevention Team Leader

Assistant Director of Maintenance
Job Title

These instructions are guidelines. They do not address all types of emergencies. Best judgment must always prevail. This plan should be reviewed with all occupants when:

1. Initially developed and implemented.
2. Substantially changed.
3. During new employee orientation.
4. Evacuations or evacuation routes are affected by changes to interior building configurations or processes.

This plan must be kept at the building and made available for employee review.

EMERGENCY PHONE CONTACTS

Address:	4104 Poole Road, Raleigh, NC 27610	
Phone Number:	919-996-3900 (M-F 8am – 5pm)	
General Manager:	Marie Parker	(C) 919 795-0957
	Name	Phone
Director of Operations:	Reginald Caldwell	(C) 919-576-3393
Asst. Dir. of Maintenance:	Antonio Jenkins	(C) 984-289-2344
Police:	Raleigh Police Department	911
	Name	Phone
Fire/Ambulance	Raleigh Fire Department	911
	Name	Phone
Electrical Co.:	Duke Power	919-508-5400
	Name	Phone
Gas Co.:	PSNC Energy	877-776-2427
	Name	Phone
Water Co.:	City of Raleigh	(M-F) 919-250-2737
	After Hours/Weekends/Holidays	919-829-1930
	Name	Phone
Property Manager:	Patrick Page	(C) 919-625-4317
	Name	Phone
Regional Manager:	David Eatman	(C) 919-398-1865
	Name	Phone
Safety:	Morris Cook	(C) 919-745-0451
	Name	Phone

MEDICAL EMERGENCIES

In the event of an onsite illness or injury, the following procedure must be followed:

1. Call 911.
2. Notify GoRaleigh General Manager, Director of Operations, Director of Maintenance, Safety Manager.
3. Provide assistance if possible.

FIRE DISCOVERY

If you discover a fire:

1. Clear the area and close the door to the room with the fire.
2. Inform others in the immediate area.

To initiate the alarm:
(Each room is equipped with automatic fire detection*)*

____ Pull the fire alarm

__√__ In a loud voice, spread the alarm to others.

FIRE EMERGENCY OPTIONS

__√__ The occupants will totally and immediately evacuate the building during a fire emergency.

_√_ Building has an automatic fire suppression system.

FIRE EXTINGUISHERS

Small fires such as wastebasket fires may be contained or extinguished quickly by properly trained employees with the use of the proper type of extinguisher.

CAUSE OF FIRE	EXTINGUISHER	FIRE-FIGHTING AGENT
Paper, wood, clothing, fabric plastic	TYPE A	Water
Oil, grease, paints, fluids, electrical equipment fires	TYPE B-C	Carbon Dioxide
Paper, wood, clothing, fabric, oil, grease, paints, fluids, electrical, plastic	TYPE A-B-C	Dry Chemical

***Never* attempt to fight a large fire with a fire extinguisher.**

***Never* use water-type extinguisher on an electrical fire.**

If, at any time, an employee fighting the fire feels that his or her safety has been compromised, cease extinguishing operation and evacuate the area immediately.

USE OF EXTINGUISHERS

The proper use of a portable fire extinguisher can be accomplished using four steps commonly known as PASS. These steps are the following:

- **P**ull the pin.
- **A**im the extinguisher nozzle at the base of the flame.
- **S**queeze the trigger while holding the extinguisher upright.
- **S**weep the extinguisher from side to side, covering the area of the fire.

Remember: the use of portable extinguishers should only be attempted by employees properly trained in their use.

Emergency Situations within the Transit System

In the event of an emergency situation, the following personnel will be responsible for direction of an emergency that may arise.

Maintenance:

Antonio Jenkins	Cell: 984-289-2344

Operations:

Reginald Caldwell	Cell: 919-576-3393
Amy Proseus	Cell: 919-604-5568
GoRaleigh Dispatcher	Cell: 919-996-3893, 3894, 3895

BUILDING EVACUATION

If the nature of the emergency or the Fire Department makes it necessary to evacuate the building, anyone may initiate the alarm. The alarm will immediately be broadcast to all parts of the building. The type of the alarm signal is:

__√__ Fire Alarm System

__√__ Methane/CO Alarm System

Evacuation should begin without delay.

All employees should assist with passing along the evacuation signal with the expectation that someone may not have heard or understood the signal.

Keep calm during emergency conditions. Do not run or panic.

All Preparedness Team Members will ensure they have handheld radios on their person tuned to channel 2. This assures proper communication between team members.

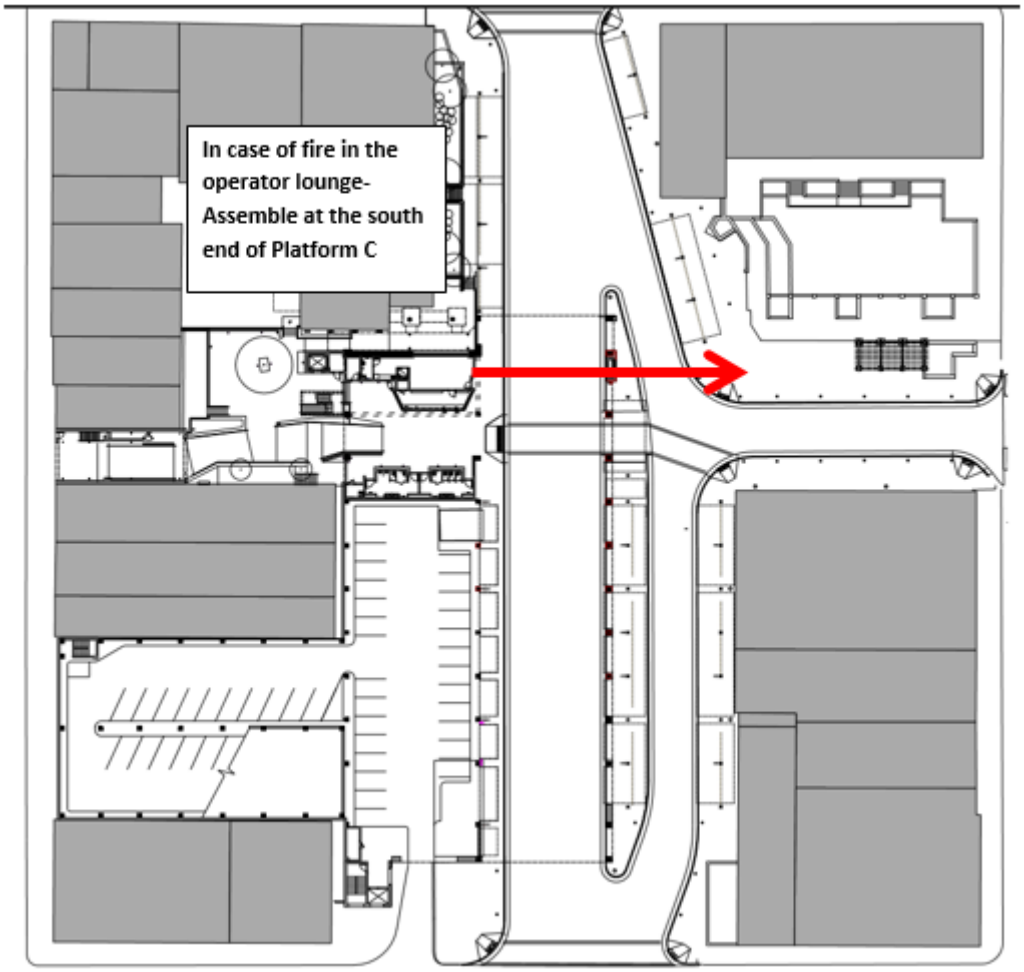
- If the fire is located in the Operations/Admin building, assemble in the front employee parking lot.
- If the fire is in the Maintenance building, assemble in the bus parking lot by dumpsters.

Keep a safe distance from the buildings and do not obstruct arriving emergency equipment. Ensure building sweeps are performed to account for all employees, visitors, contractors or other persons known to have been in the building during and immediately following the evacuation. All persons must be accounted for.

A report on the status of any persons unaccounted for should be given immediately to the Preparedness Team member and emergency services upon their arrival. Preparedness Team members will assign personnel to post employees at the entrance to the facility, so they may relay to emergency crews the location of the emergency.

RTOF

GoRaleigh Station



PREPAREDNESS & PREVENTION TEAM

Each team leader and member(s) must be listed:

Name	Job Title	
Antonio Jenkins	Asst. Director of Maintenance	PPT Leader
Reginald Caldwell	Director of Operations	PPT Member
Amy Proseus	Asst. Director of Operations	PPT Member
Morris Cook	Safety Manager	PPT Member

PREPAREDNESS & PREVENTION TEAM LEADER

1. Ensures all positions on the Building Preparedness & Prevention Team are staffed at all times, and any vacancies in the organization created by transfers or relocations are filled promptly.

2. Maintains a complete copy of the Preparedness & Prevention Plan and be thoroughly familiar with the emergency procedures as set forth in this plan with any revisions. He or she must be familiar with physical features of his or her designated floors and the number and characteristics of the occupants.

3. Maintains a current list of persons who or would have difficulty during an emergency and assign individuals to assist them in evacuation.

4. Ensures that the building's PPT has been alerted concerning the nature and scope of the emergency.

5. Ensures that local fire Department/Police or Rescue units have been alerted (depending upon the nature and scope of the emergency).

6. Verifies that designated areas of refuge are free of smoke or other hazards.

7. Directs actual evacuation to designated area of refuge or from building.

8. Confirms on an area-by-area basis that all areas slated for evacuation have been safely and completely evacuated.

9. Confirms that all employees, visitors, contractors or other persons known to have been in the building are accounted for after an emergency evacuation.

10. Upon fire alarm or other notification of emergency, proceeds to the designated area of refuge.

11. Shuts off, operates or limits building mechanical systems as required to control hazards, including:

    a. Ventilation system

    b. Electrical

    c. Gas

    d. Emergency power

    e. Smoke removal equipment

PREPAREDNESS & PREVENTION TEAM MEMBER(S)

1. Is thoroughly familiar with the emergency procedures as set forth in this plan, including any revisions. Must be familiar with physical features of relevant floors and the number and characteristics of the occupants.

2. Is familiar with the current list of persons who would have difficulty during an emergency and assigns individuals to assist them in evacuation.

3. Assists in alerting the PPT concerning the nature and scope of the emergency.

4. Assists PPT Leader in notification of local Fire Department, Police or Rescue units, depending upon the nature and scope of the emergency.

5. Verifies that designated areas of refuge are free of smoke or other hazards.

6. Directs actual evacuation to designated area of refuge or from building.

7. Confirms on an area-by-area basis that all areas slated for evacuation have been safely and completely evacuated.

8. Confirms that all employees, visitors, contractors or other persons known to have been in the building are accounted for after an emergency evacuation.

9. Oversees the evacuation procedure.

10. Checks all rest rooms, offices, conference rooms, etc. to ensure that all personnel and visitors have been evacuated.

11. Informs the PPT leader of any problem encountered in the evacuation of the person(s) requiring special assistance.

12. Stays with any person requiring special assistance throughout the evacuation and assists him/her safely to the designated assembly area.

13. Requests assistance from other employees, as needed.

14. Notifies the Building Emergency Coordinator when the area/building is evacuated.

FIRE AND EVACUATION DRILLS

Fire and evacuation drills are to be conducted annually. The drills will be conducted for all shifts that the facility is occupied. The actual drills need not entail a complete evacuation of the facility. The intent of this requirement will be met if building occupants assemble in the designated safe areas of refuge (such as stairwells or lobbies). It would be beneficial, however, to periodically conduct a complete evacuation to ensure the PPT is performing as designated. A critique of each drill will be conducted to identify and correct problems. A memorandum of record will be prepared at the conclusion of each drill detailing the date, the time, whether the evacuation was partial or complete, and any problems identified. All records are included in Appendix A.

FIRE DEPARTMENT ORIENTATIONS

Local Fire Departments will be invited annually.

Fire Department name: Raleigh Fire Department Station 12

Address: 3409 Poole Road, Raleigh, NC 27610

Phone number: (Non-Emergency) 919-831-6115

FIRE REPORTS (Use form in Appendix C)

In the event an actual fire occurs, a Fire Report must be completed. Use Appendix B Fire Report.

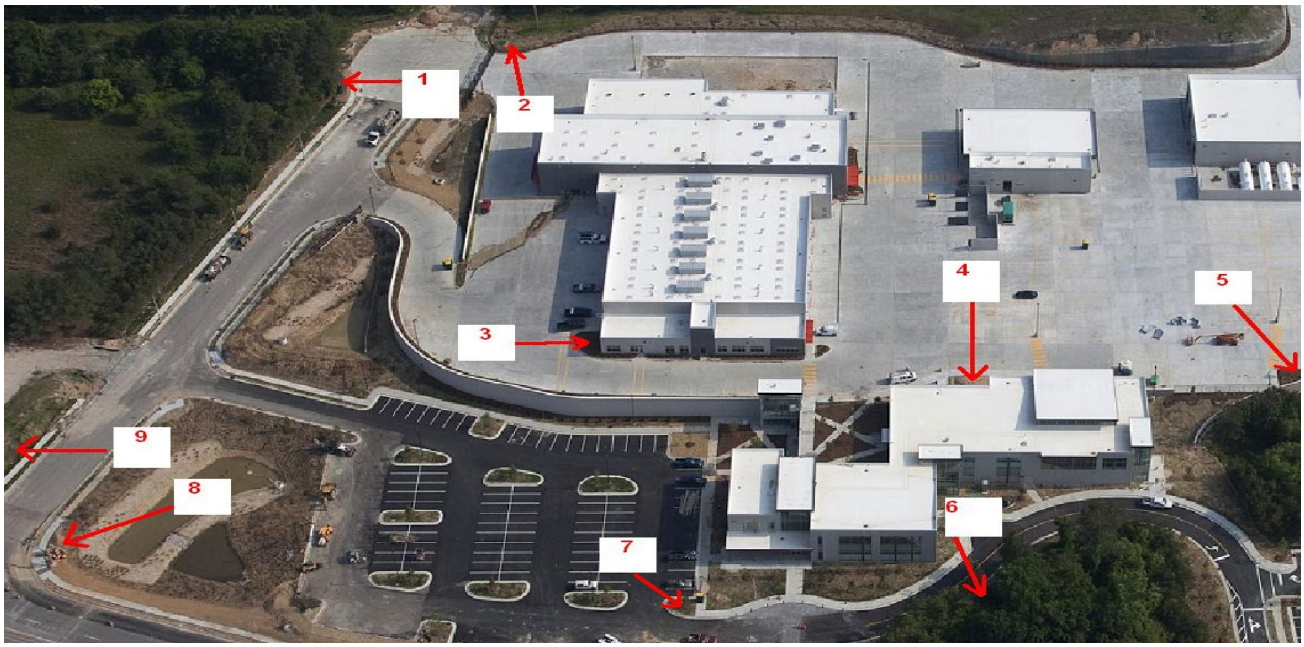
MONTHLY FIRE INSPECTIONS

An inspection must be made on a monthly basis of this building. Deficiencies or unsafe conditions will be corrected immediately if possible.

Raleigh Transit Operations Facility

Locations of Fire Hydrants

There are currently nine (9) Fire Hydrants located throughout the facility. The picture below shows where each is located:



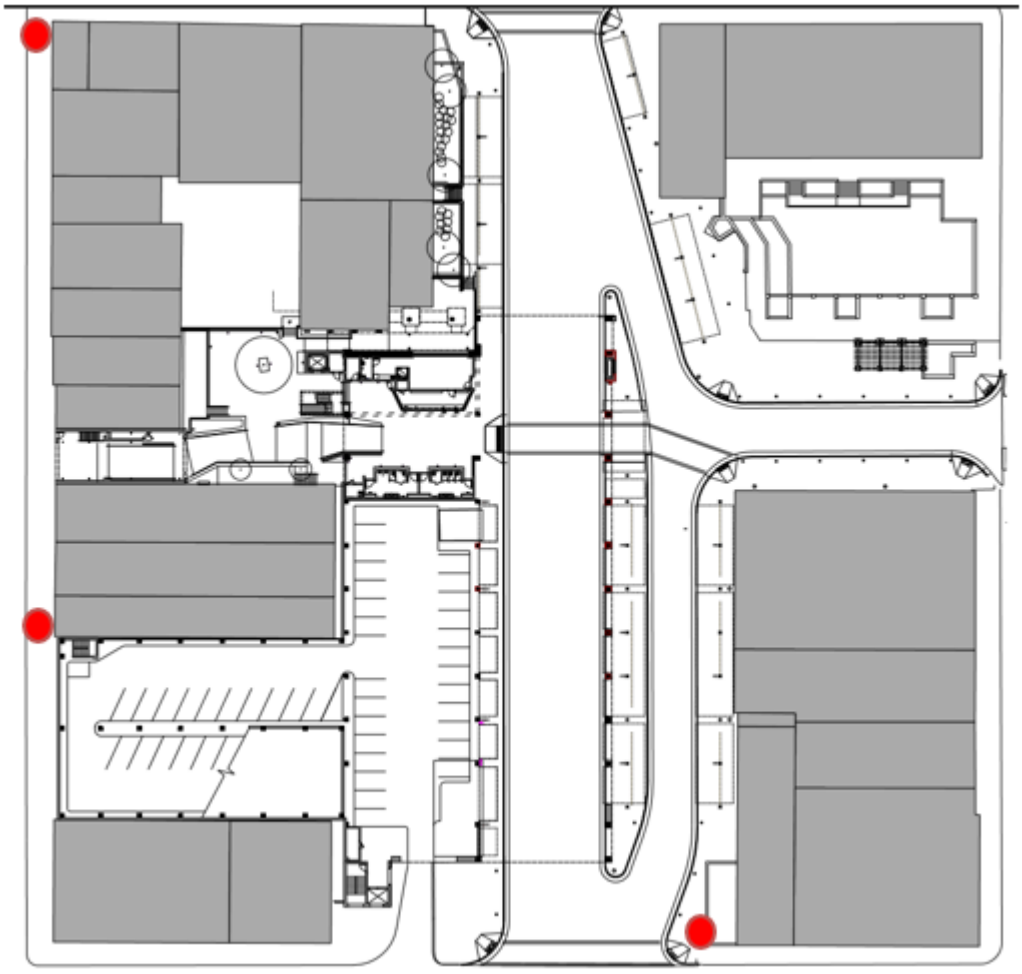
Routes of Fire Department Vehicle Access

The map below shows access routes for emergency vehicles:

GoRaleigh Station

Locations of Fire Hydrants:

There are currently three (3) Fire Hydrants located in the station. The picture below shows where each is located:



Routes of Fire Department Vehicle Access

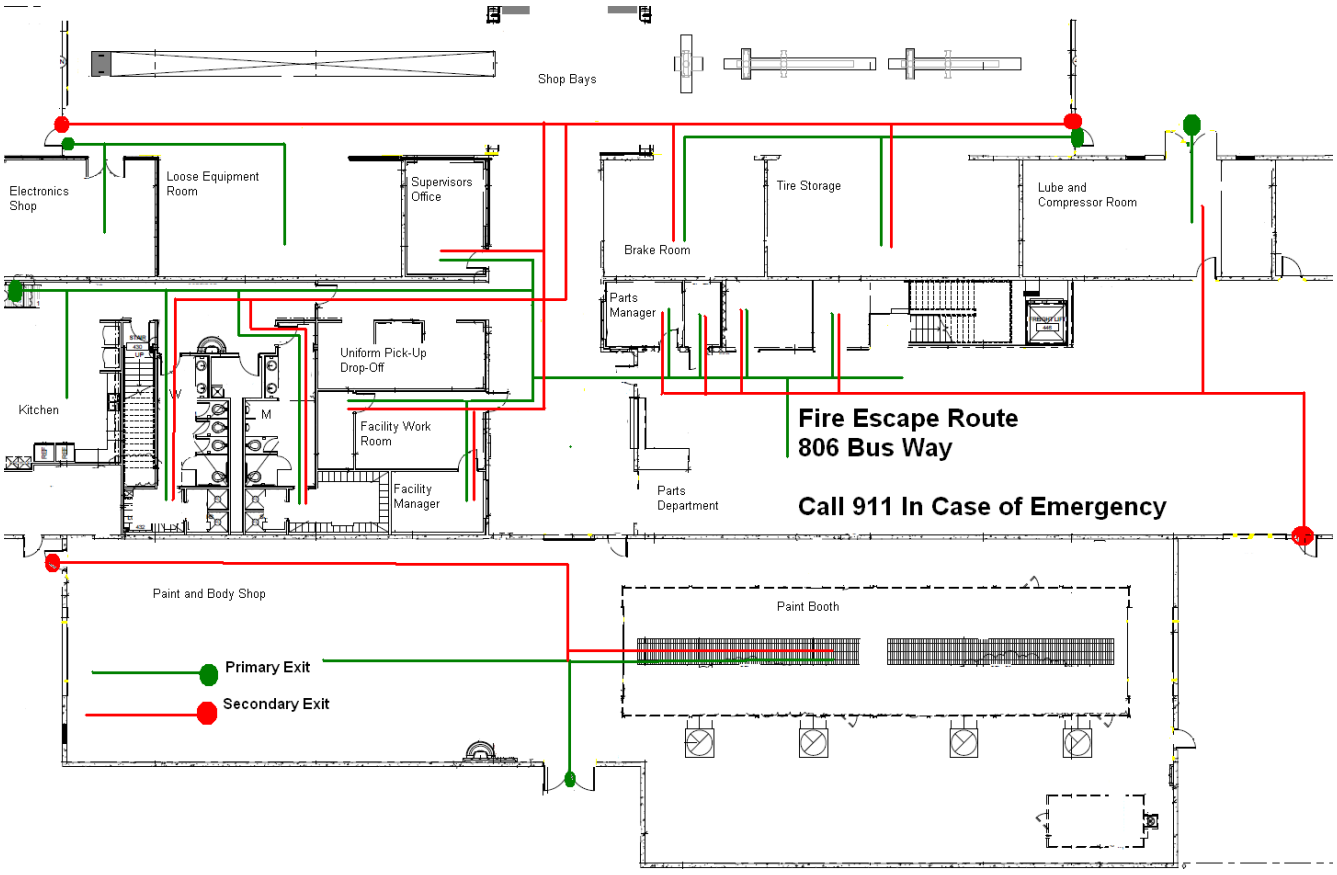
The map below shows access routes for emergency vehicles:

Fire Escape Routes

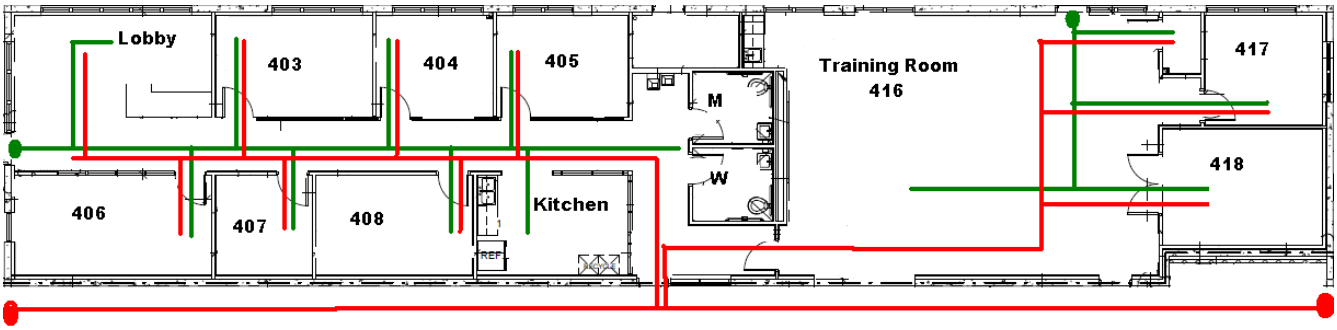
The maps below indicate the primary escape routes (in green) and the secondary escape routes (in red). The red or green circles indicate exits.

Raleigh Transit Operations Facility

Maintenance Building:



Maintenance Admin:



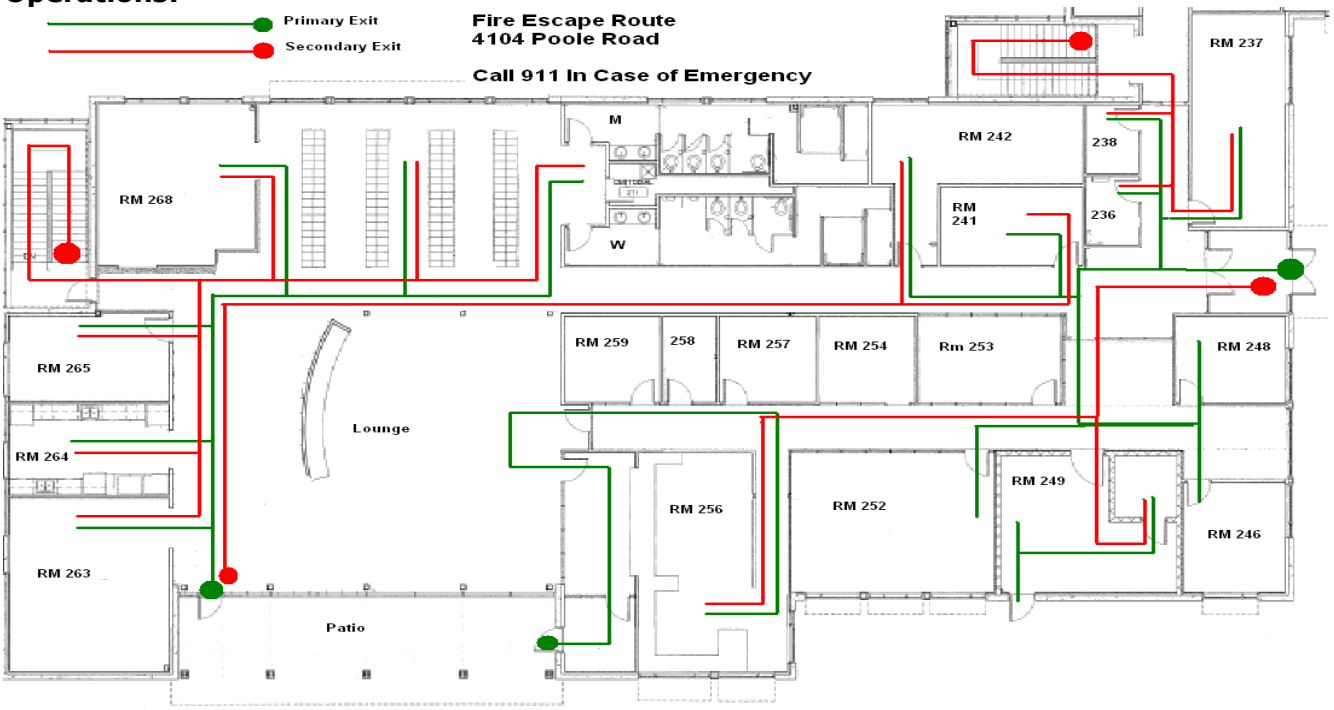
Primary Exit

Secondary Exit

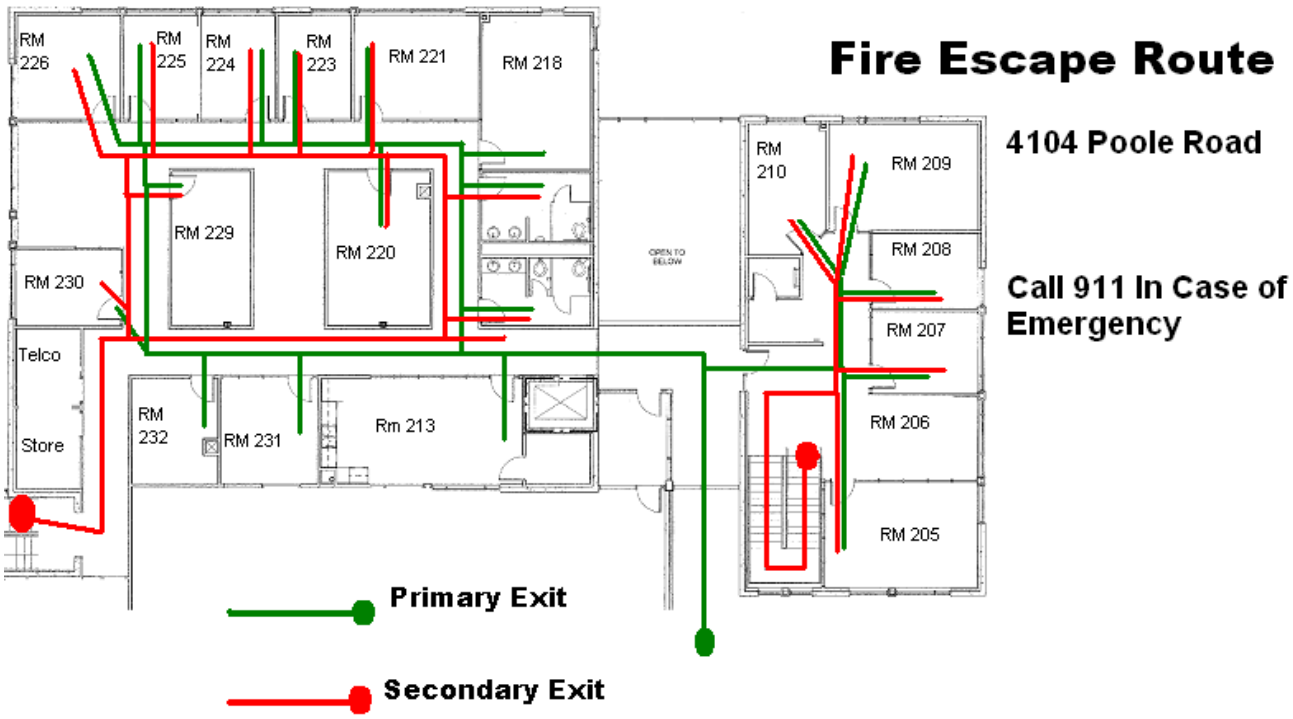
Fire Escape Route
806 Bus Way

CALL 911 In Case of Emergency

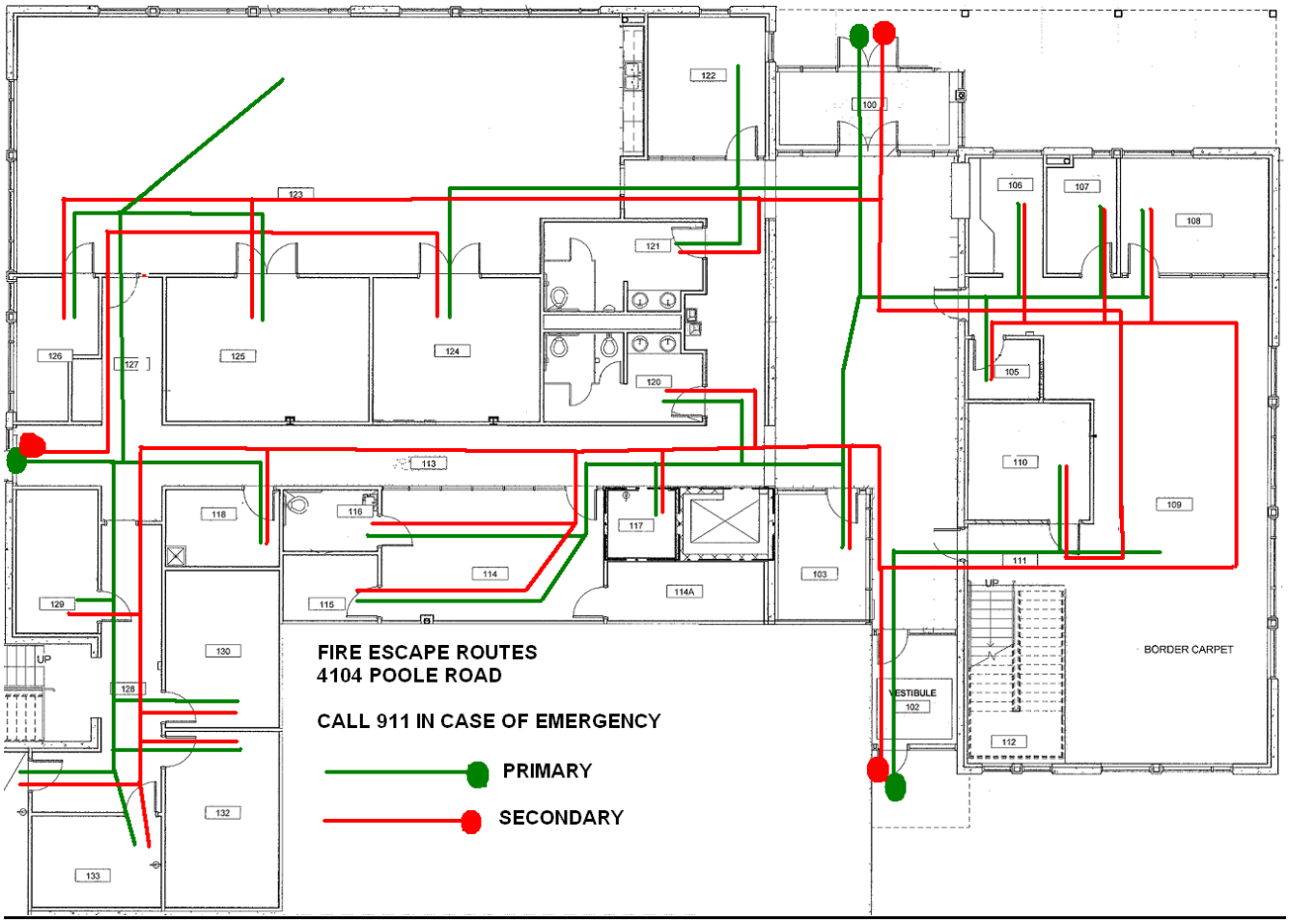
Operations:



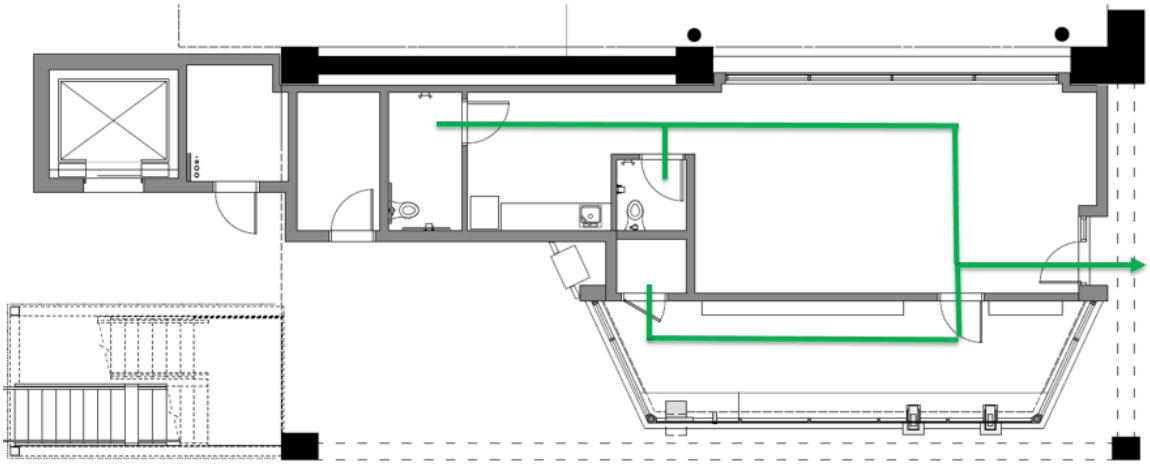
Administration 2ND Floor:



Finance:


FIRE ESCAPE ROUTES
4104 POOLE ROAD
CALL 911 IN CASE OF EMERGENCY
PRIMARY
SECONDARY
BORDER CARPET
VESTIBULE
UP

GoRaleigh Station



Primary Exit

Secondary Exit

Fire Escape Route
GoRaleigh Station

CALL 911 IN THE CASE OF EMERGENCY

SEVERE STORMS

- Follow the instructions of law enforcement/public safety personnel.
- Remain inside the building unless instructed to do otherwise by law enforcement/public safety personnel.
- Stay away from windows and doors and keep others away as well.
- Keep away from all emergency personnel and vehicles.
- Avoid panic.
- Avoid using the telephone except to report status or urgent needs.
- Do not reenter the building without the approval of emergency personnel.

Primary areas of refuge include the following:

Front Office: Assemble in either the Male or Female Rest Rooms.

Operations Department: Assemble in either the Male or Female Rest Rooms.

Maintenance Department: Assemble in the PM Inspection Pits.

GoRaleigh Station: Operator's Lounge

FACILITY LOCKDOWN PLAN

When notified by Emergency Personnel (Police, Fire Department, TSA) or when a situation arises, the entire facility will be locked down to prevent unauthorized movement. The Operations and Admin Building (during normal working hours) is in a constant state of lockdown. The only access is via the front door. All other entry points to the facility require a swipe badge or key to unlock including the elevator.

- Lockdown Initiation: When notified by Emergency Personnel or a credible threat has been received; the facility will be locked down. Only the General Manager can initiate the lockdown.

- Lockdown Procedure: The General Manager will notify all Department Heads that the facility will be locked down. The Department Heads are responsible for ensuring that all access points in their department are locked. For doors that are controlled electronically, the Facility Manager will override the Building Automation Software for door locks and place them in the locked position.

- All Department Heads will have on them handheld radios set to channel 2.

- Once the facility is locked down, all personnel will be accounted for by each Department Head. Communicate results to the General Manager via radio.

- All employees will be informed via loudspeaker or word of mouth about the lockdown.

- All employees should move to a designated **SAFE ROOM**.

- **Safe Room locations are:**

  Raleigh Transit Operations Facility

  - Secure Storage in Finance (RM 110)
  - Money Room (RM 249)
  - Maintenance Mechanical Room (RM 501)

  GoRaleigh Station

  - Operator's Lounge

  These rooms are identified with 3"X3" Yellow Sticker in the upper right-hand corner of the door (see picture below). Each door is equipped with a "Peep Hole" so the identity can be confirmed of the person outside the door.

- The General Manager will inform the Department Heads, via radio, when it is safe to resume normal operations.

BOMB THREAT

All bomb threats received at this location are to be considered real and treated as such. The following actions should be taken:

- Remain as calm and attentive as possible and listen to every detail of the caller's voice and any background noise.
- Try to keep the caller on the line as long as possible.
- Ask the caller:
  - What is your name and phone number?
  - Where is the bomb (building address, room, etc.)?
  - What does the bomb look like?
  - When will it explode?
  - What kind of a bomb is it?
  - Why was the bomb planted?

As soon as the call is terminated, write down the exact wording (using Appendix C) of the threat and contact local law enforcement, or if the circumstances, such as time constraints dictate otherwise, then initiate an orderly evacuation and contact the local law enforcement or emergency response agency.

Local Law Enforcement Agency: Raleigh Police Department 911

SECURITY

This section outlines the security procedures and equipment in use at this facility. These precautions are intended to prevent unknown entry and to minimize the possibility of unauthorized entry of persons to the active portion of the facility.

a. Security Procedures & Equipment – All areas of the facility where hazardous materials and wastes are stored are fenced in and secondary containment has been provided. No hazardous materials are stored outside, exposed to storm water. All hazardous materials and waste containers are secure from vandals and the public.

b. Barrier – A six-foot high metal fence completely surrounds this facility, serving as an artificial barrier to unknowing or unauthorized entry.

c. Warning Signs – Warning signs with the legend, "Flammable – Diesel Fuel", are located at the fueling area. The signs are legible from a distance of 25 feet.

INSPECTION SCHEDULE

This section provides the facility schedules for inspection of hazardous material and waste storage. This includes equipment, safety and emergency equipment, and operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards.

a. General Inspection Requirements – All hazardous material and waste storage units are inspected daily by Shift Supervisors.

b. Container Inspection – Containers of oils, grease, antifreeze, solvents, and hazardous waste in the container storage area are inspected daily for leaks, spills and deterioration caused by corrosion or other factors by Shift Supervisors

c. Tank Inspection – The fuel, oil, used oil, and hazardous waste storage tank(s) are inspected daily for leaks, spills and deterioration caused by corrosion or other factors by Shift Supervisors.

PREPAREDNESS & PREVENTION REQUIREMENTS

The following section describes how preparedness and prevention requirements are complied with at this facility.

a. Internal Communications – Several modes of internal communications are used at the facility to provide immediate emergency instructions to facility personnel. They include personal contact, telephones, and two-way radios. In addition, the facility uses a fire and emergency alarm system. Each area is designated by a series of blasts and all personnel are trained upon hiring as to the meaning of this signal and action to be taken when the alarm is activated.

b. External Communications – Telephones with external communications for summoning offsite assistance in the case of an emergency are located throughout the facility.

c. Emergency Equipment – Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment are available at the facility. The location of fire control, safety and other emergency equipment is given on the facility site map.

d. Water for Fire Control – The facility has water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems. The location of water for fire control and pumping equipment is given on the facility site map.

e. Aisle Space Requirement – The facility parts room maintains sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of facility operation in an emergency. All roadways at this facility are approximately twenty feet wide, which is sufficient for unobstructed movement of personnel and fire fighting equipment.

PREVENTIVE PROCEDURES, STRUCTURES & EQUIPMENT

Outlined in the following section are the procedures, structures and equipment in place at this facility to protect human health and the environment.

a. Unloading Operations – An open stall in the shop/parts room is used to unload part deliveries. A forklift is used to unload 55-gallon drums to the storage areas.

b. Runoff – No storage of used parts, hazardous materials or waste, vehicle washing, or engine degreasing is done outside or exposed to storm water. Storm drains are checked weekly for staining, illegal dumping, sheening or possible lean-out by Supervisors.

PRECAUTIONS TO PREVENT IGNITION OR REACTION OF IGNITABLE OR REACTIVE WASTE

Policy throughout the Raleigh Transit Operations Facility prohibits smoking in any area of the entire facility including public/employee parking lots.

With regard to precautions to prevent ignition or reaction of ignitable, reactive, or incompatible materials or waste, only fuel and waste solvent would be applicable.

a. General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste – New and used oils and a small amount of new solvent are the only hazardous materials/waste at this facility. Both materials are disposed of offsite. The containment area for both is located in the maintenance facility away from main work and office areas. Fire extinguishers are available at the containment units if needed for emergencies.

b. Management of Incompatible Wastes in Containers/Tanks – To ensure that incompatible wastes are not placed in the same containers, the used oil tank is labeled for used oil only. No other material except used oil is permitted in this tank. The tank is secure from vandals and used oil is not accepted from employees or from outside sources such as the public.

c. Management of Ignitable or Reactive Wastes in Tanks – Used oils pose no real fire hazard as no volatiles are mixed with them. No reactive waste is stored on-site.

RESPONSIBILITIES

Operating Department Heads: It is the responsibility of department heads to implement the Preparedness and Prevention Plan and as appropriate, amend it to ensure accuracy with site conditions.

Environmental Coordinator: Until otherwise delegated, the environmental coordinator will carry out the following responsibilities:

a. Determine the precautions necessary to prevent sudden or accidental releases of hazardous waste to the environment.

b. Develop a Preparedness & Prevention Plan that includes required equipment, testing and maintenance of the equipment, an alarm system, telephone or two-way radio, fire extinguishers and water.

APENDIX A

EVACUATION DRILL REPORT

Date: _____

1. Building location:
   _____
2. Building (name or number):
   _____
3. Building population:
   _____
4. Drill observed by:
   a. Name:
   _____
   b. Name:
   _____
   c. Fire Official/Fire Dept. Notified: Yes _____ No _____
      Attended: Yes _____ No _____
      Name of Attendees:
      _____

DRILL

5. Pre-announced: Yes _____ No _____
6. Starting time: _____ Completed: _____ Total Time: _____
7. Location of Alarm Activation: _____ Type: _____
8. Alarms and/or PA System working: Yes _____ No _____
   Remarks:
   _____

9. Building PPT member present: Yes _____ No _____

10. Was the building or sections completely evacuated: Yes _____ No _____

11. Did all occupants participate: Yes _____ No _____

    Remarks:
    _____

12. Did evacuees assemble away from building: Yes _____ No _____

    Remarks:
    _____

13. Remarks:

APPENDIX B

FIRE REPORT FORM

Location of Fire (Mailing Address)

Date & Time of Discovery | Time Started | Time Extinguished

Specific Location of Fire

Estimated $ Loss:

Building:	$
Equipment and Products:	$
Cleanup:	$
Business Interruption:	$
Total:	$

APENDIX C

BOMB THREAT CALLER PROFILE

Time of call _____ Phone number on which received _____

Date of call _____ Duration of call_____

Name of supervisor notified of call _____

Time notified _____

EXACT WORDING OF THREAT

_____

_____

_____

_____

_____

_____

(*Use rear of sheet for additional information)*

CALLER'S VOICE SOUNDS

_____ Calm
_____ Angry
_____ Excited
_____ Slow
_____ Rapid
_____ Soft
_____ Loud
_____ Laughter
_____ Crying
_____ Nasal
_____ Stutter
_____ Lisp
_____ Raspy
_____ Deep
_____ Clearing throat
_____ Deep breathing
_____ Cracking voice
_____ Disguised

BACKGROUND

_____ Street
_____ Noise
_____ Kitchen noise
_____ Voices
_____ PA System
_____ Music
_____ House
_____ Motor
_____ Office
_____ Machinery

CALLER'S VOICE SOUNDS

_____ Normal
_____ Accent
_____ Distinct
_____ Familiar
_____ Slurred
_____ Clear

BACKGROUND

_____ Factory
_____ Animal noises
_____ Static
_____ Machinery

If voice is familiar, who did it sound like?
_____

REMARKS:

_____

_____

_____

_____

THREAT LANGUAGE

_____ Well-spoken
_____ Incoherent
_____ Educated
_____ Taped
_____ Foul maker
_____ Message read by threat

Did the caller's voice exhibit any regional or ethnic accent?

_____

_____

_____

_____

APPENDIX I

Maintenance Performance

Purpose

To ensure that each location adheres to company policies and programs, and that the maintenance operation is managed in a cost-effective manner in accordance with Federal, State, and Local regulations, and contractual requirements.

Section 1	Vehicle Appearance & Cleanliness
Section 2	Maintenance Management
Section 3	Facility Environment
Section 4	Vehicle Inspection For Quality/Reliability
Section 5	Inventory Cost Controls
Section 6	Maintenance Cost Controls

Section 1: Vehicle Appearance & Cleanliness

A. Exterior Body Condition

Locations will be graded on the overall exterior body appearance of the vehicles inspected during the audit. Vehicles will be selected at random by the auditor. Items inspected will include, but are not limited to: body panels, front and rear bumpers, windows, lighting, paint and graphics, and wheel condition.

The maximum score of 5 corresponds to a fleet with 100% of vehicles inspected and found defect-free, with all requirements pertaining to vehicle appearances outlined in this manual met or exceeded.

B. Exterior Cleanliness

Locations will be graded on vehicle exterior cleanliness, including overall appearance, lack of soap streaking and residue, absence of accumulated road grime, and washing procedures.

Maximum score of 5 corresponds to 100% compliance with both company and contractual standards, and no instances of defects found.

C. Interior Condition

Locations will be graded on the condition of all interior fixtures, features, and appointments. Items inspected will include, but are not limited to windows, passenger seating, driver seat, floor covering, pull cords and touch strips, handrails, and stanchions, interior lighting, PA system, emergency exits (windows & hatches) and overhead storage (if applicable). This will also include inspection all safety related equipment, such as fire extinguisher and road flares. The maximum score of 5 corresponds to a fleet with 100% of vehicles inspected and found

defect-free, with all contractual requirements, as well as guidelines outlined in this manual met or exceeded.

D. Interior Cleanliness

Locations will be graded on vehicle interior cleanliness. All vehicles must meet contractual cleaning requirements, and procedures must be documented and followed.

The maximum score of 5 corresponds to a fleet with 100% of vehicles inspected and found defect-free.

E. Decals and Signage

Locations will be graded on presence and condition of vehicle interior decals and signage. This includes signage required for regulatory and contractual compliance. No faded or torn items are permitted. If vehicles are equipped with interior electronic signage, the system must illuminate properly and be programmable. If vehicles are equipped with removable interior placard signs, the frames must be properly attached and the signs easily removable.

The maximum score of 5 corresponds to a fleet with 100% of vehicles inspected and found defect-free.

Section 2: Maintenance Management

A. Adherence to PMI Schedule and Oil Analysis Program

Locations will be graded on compliance to scheduled maintenance requirements. Best practice is utilization of Network FASTER maintenance software.

A comprehensive oil analysis program is required at all Transdev maintenance operations. Locations will be graded on oil analysis program records and any corrective actions taken as a result of unacceptable sample testing. The Auditor may ask for up to 12 months of records. All items must be documented; documentation may be in paper records.

The maximum score of 5 corresponds to a location with 100% annual compliance, with all requirements of this manual met or exceeded.

B. Work Order Accuracy

Locations will be graded on compliance with the required documentation of all work performed on revenue vehicles with formal work orders. Locations will be graded on the work order records maintained. Each work order must list the reason for work, as well as the following information: date of work, vehicle identification number, the vehicle's mileage at the time of work, any labor charges, all materials used, and a description of the repairs/work/PMI performed. Work orders are to be maintained in numeric/chronological order, with one folder for PMIs and another for regular work orders. Work order records should be maintained for the length of the location's contract.

The maximum score of 5 corresponds to a location with 100% compliance to all criteria described above.

C. Q/A-Q/C Program (See **Maintenance Policy Manual Section 8.3**)

Locations will be graded on compliance to Quality Assurance Programs as required by policy. Procedures should be audited in progress when possible. The audit program requires process sheets to be signed off by local management when work is audited. Deficiencies will be documented on the sheet and discussed with the employee who performed the work. Managers will ensure that at least 20% of all scheduled work performed at the facility is audited. The managers will also spot check a portion of Supervisor audits to ensure the quality of the program. All technicians are to have a portion of their work audited quarterly. Copies of all audited work must be maintained for at least 12 months in the QA file, with records grouped by month. All third-party fleet audits should be maintained in a separate file. Records should include the details of any corrective action taken as a result of an audit, as well as any subsequent disciplinary actions.

The maximum score of 5 corresponds to a location with 100% compliance to all criteria described above, with all requirements pertaining to QA outlined in this manual met or exceeded. (If a comprehensive program is currently in place, the Auditor has latitude to provide a high score.)

D. Maintenance Records

Locations will be graded on vehicle maintenance records. All records must be well organized. Each vehicle must have an individual file with specific information. Each file must include, but is not limited to, work orders and DVIRs in chronological order, copies of any required State or Federal safety inspections and emission testing records (if applicable). If any DVIR required maintenance action, the work order number must be recorded on the DVIR with the technician's signature. All records must be kept in a secured area. Maintenance records are to be managed daily and weekly by assigned personnel.

The maximum score of 5 corresponds to a location with 100% compliance to all criteria listed above, with all requirements pertaining to maintenance records outlined in this manual met or exceeded.

E. Warranty Procedures

Locations will be graded on their use of FASTER software as the primary tool for management of the vehicle warranty program, including new vehicle and replacement part warranties. Requirements include the following:

- VT-10 tags or equivalent on all warranty items.
- A return area identified in stockroom for warranty return items.
- Monthly warranty claim report for GM including details on all replaced warranty items, the number of claims closed and all outstanding claims. In addition, the report should include the dollar recovery for the month and year to date. (Warranty portion of audit will be more definitively outlined once national maintenance software program is in place.)

The maximum score of 5 corresponds to a location with 100% compliance to all criteria listed above, with all requirements pertaining to warranty procedures outlined in this manual met or exceeded.

Section 3: Facility Environment

A. Computers/Software/Technical Publications

Locations will be graded on their adherence to the following criteria:

- Location is maximizing capital investment for maintenance software program and associated equipment.
- Staff is properly trained to utilize software and equipment.
- Maintenance software is the center of activity relating to documenting work, reviewing vehicle history and recent repairs and scheduling work. The software should also address tire management protocols, if required by site.
- System provides reports to assist in the management of the maintenance operation.
- All shop personnel are trained and competent in software disciplines that pertain to their job descriptions.
- Location has sufficient amount of hardware (workstations, if paperless) to perform work.

Locations will also be graded on the availability and condition of appropriate technical publications/manuals. The facility's technical library should be clearly identified. If publications/manuals are on CD-ROM, the material should be readily available to technicians.

The maximum score of 5 corresponds to a location with 100% compliance to all criteria listed above.

B. Electronic Brake Meter (EBM) Utilization

Locations will be graded on the use of the Vericom VC3000 DOT-approved EBM. The device should be used in accordance with **Section 3-1.5** of the **Transdev Maintenance Policy Manual**.

The maximum score of 5 corresponds to a location with 100% compliance to all criteria listed above.

C. Refrigerant Recovery Unit Utilization

Locations will be graded on the use of a registered and approved recovery unit, available on site and in good working order. Technicians should be appropriately trained to use equipment, with training documented in employee personal/training files. The site must have technicians licensed or certified to perform air conditioning repairs. Additionally, refrigerant usage must be documented and recorded.

The maximum score of 5 corresponds to a location with 100% compliance to all criteria listed above.

D. General Shop Tools and Equipment (including Electronic Diagnostic Equip)

Locations will be graded on the conditions of all facility tools and equipment. All equipment must be well maintained and in good working order. The facility should have adequate jacks, safety stands, air hoses, tire impact wrenches and general tools. Adequate quantities will be determined based on fleet and facility size. All tools must be inventoried annually and properly stored.

Location will also be graded on the use of proper electronic engine and transmission diagnostic equipment as required by the manufacturer, with all appropriate personnel trained

in their use.

The maximum score of 5 corresponds to a location with 100% compliance to all criteria listed above.

E. Facility Security and General Condition

Locations will be graded on their adherence to the following criteria:

- If a facility has security cameras, they must be in good working order. The system tapes should be reviewed periodically for security issues and policy violations. System reviews must be documented on a Security System Review Form. The form should document the time of review, the employee performing the review, any discrepancies identified, and any corrective actions taken (if required).
- All offices and sensitive records must be secured. Interior and exterior of facility must be well-lit. Non-revenue vehicles are locked, all vehicle keys controlled, and all company tools secured. A sign-out system should be used to control tools. All vehicles should be parked in a fenced and secured area.
- The layout and design of the facility should be conducive to a productive and efficient maintenance operation.

The maximum score of 5 corresponds to a location with 100% compliance to all criteria listed above.

Section 4: Vehicle Inspection for Quality/Reliability

A. Undercarriage / Engine Compartment Condition

Locations will be graded on their adherence to the following criteria:

- Vehicles have no suspension parts worn to a point that affects drivability or reliability. This also includes all frame members, suspension parts, and associated fasteners and brackets.
- All components have useful life cycle and wear indicators. These indicators must be utilized during PMI processes and related follow-up work.
- Engine compartment free of excessive dirt.
- No fluid leaks of any kind.
- All belts serviceable until next PMI interval.
- All electrical connections properly secured and free of corrosion.
- Radiators free of excessive dirt and debris.
- All hoses, lines, connections and hose clamps serviceable until next PMI interval.

The maximum score of 5 corresponds to a location with no defects found on 100% of vehicles inspected, with all requirements outlined in this manual met or exceeded.

B. Brake / Steering / Tire & Wheel Condition

Locations will be graded on their adherence to the following criteria:

- Brakes properly adjusted.
- No worn brake hardware or components.

- Minimum requirements for brake lining met.
- Brake drums and rotors free of excessive heat cracks and ridges.
- No fluid leaks, wheel seal leaks or audible air pressure leaks.
- No excessive play in king pins, tie rod ends, drag link ends, steering shafts and shaft joints.
- No excessive play in control arms or steering box.
- Pitman arms securely attached.
- Tires of same type on each axle position.
- Tires properly inflated.
- Minimum requirements for tread depth met.
- Wheels in good condition with no worn holes or cracks.
- Drive axle wheel hand holes properly aligned.
- Valve stems of proper length and properly aligned.
- No abnormal tire wear patterns on steering axles.

The same standards will apply to units with steering tag axles.

The maximum score of 5 corresponds to a location with no defects found on 100% of vehicles inspected, with all requirements pertaining to brake and steering component condition outlined in this manual met or exceeded.

C. Wheelchair Ramp / Lift System Condition

Locations will be graded on the condition of all lift equipment. All lifts must be in good working order. All wheelchair restrains, flip seats and other safety-related equipment must function as designed.

The maximum score of 5 corresponds to a location with no defects found on 100% of vehicles inspected, with all requirements pertaining to wheelchair lift systems outlined in this manual met or exceeded.

D. Electronic Systems (AVL, Destination Signs, Fare Box, Radio, etc.)

Locations will be graded on condition and operation of all transit systems.

The maximum score of 5 corresponds to a location with no defects found on 100% of vehicles inspected, with all requirements pertaining to transit systems outlined in this manual met or exceeded.

E. HVAC System

Locations will be graded on condition and operation of HVAC systems.

The maximum score of 5 corresponds to a location with no defects found on 100% of vehicles inspected, with all requirements pertaining to HVAC systems outlined in this manual met or exceeded.

Section 5: Inventory/Cost Controls

A. Inventory Ratio to Consumption

Locations will be graded on whether the normal inventory levels meet the needs of the maintenance operation to effectively and efficiently maintain the fleet. The Auditor has latitude to score this item at 5 if he deems the factors listed below are at issue. However, specific examples are required to justify this score. The relevant factors include the following:

- The majority of the vehicles in the fleet are like units.
- The fleet has not exceeded useful life cycle.
- The fleet has been maintained properly for an extended period of time.
- Other extenuating circumstances. Obsolete & Low Usage Reports may be reviewed over the previous twelve months.

A daily Requisition Report should be utilized with the minimum and maximum stocking levels managed automatically by the FASTER system.

B. Inventory Turn Ratio

Turn ratio is the number of months it will take to turn over the total dollar amount of a stated inventory. Example: If the valve of an inventory averages $30,000.00 and the monthly spend is $10,000.00 the turn ratio would be 3.0.

Inventory Turn Ratio Score:

5 Turn ratio of 3 or less
4 Turn ratio of 3.0 – 3.5
3 Turn ratio of 3.5 – 4.0
2 Turn ratio of 4.0 – 4.5
1 Turn ratio of 4.5 or higher

C. Inventory Cycle Counts

Locations will be graded on an inventory cycle count on at least 20 items performed by the Auditor. The purpose of the count is to verify inventory accuracy. The items will be chosen at random by the Auditor.

The maximum score of 5 corresponds to a location with a count accuracy of 100%

D. Purchase Order Management

Location will be graded on the presence of the following control procedures:

- Tracking log is maintained (if paper purchase orders are used).
- Purchase orders are used in numeric sequence, with all numbers accounted for.
- Approval process is in place for issuing purchase order. Maintenance Manager or designee must approve all purchases in accordance with current company policy. Maintenance Manager is responsible for all purchasing activity at the location.
- Requisition/reconciliation process is in place for material and parts receiving. When shipments are received, items must be entered into inventory same day.
- Purchase orders are expeditiously forwarded to accounts payable after purchase orders have been reconciled. No aged invoices are acceptable.

The maximum score of 5 corresponds to a location with 100% compliance with all criteria listed above.

E. Obsolete Stock Issues

Location will be graded on inventory levels for aged or non-moving items. If maintenance software has the ability to provide specific reports for individual items, the reports will be utilized for validation purposes. Aged stock items should not exceed 5% of total inventory value. Obsolete stock is defined as any item without movement for a period of twelve months.

The maximum score of 5 corresponds to a location with less then 5% aged/dead stock issues. The above criteria will evolve when a national software program is implemented.

F. Over/Understated Inventory

Locations will be graded on data from last 100% physical inventory. The difference between actual inventory and computer count will be viewed as overstated inventory. Additionally, the Auditor will spot count the top 10 high dollar items in the inventory for accuracy and part movement.

The maximum score of 5 corresponds to a location with less than 3% variance on the last physical inventory and 100% accuracy on the spot-count of top 10 high dollar items.

G. Parts Room Organization and Appearance

Locations will be graded on the overall appearance and organization of the parts room/area. Lighting should be sufficient; the area should be clean and free of debris. Shelves and bins should be clearly labeled. Parts should be organized and stored in a logical and efficient manner (i.e., established zones based on types of materials and vehicle subassemblies, fast-moving parts more easily accessible, etc).

Maximum score of 5 corresponds to a location that meets or exceeds all the criteria specified in this manual.

H. Inventory Procedures

Locations will be graded on the quality of inventory management at the maintenance location, specifically adherence to policy guidelines, use of FASTER (or equivalent) software, and presence of established protocols and procedures:

- FASTER-generated requisitions are utilized.
- FASTER-generated purchase orders are utilized.
- Parts are entered into FASTER immediately upon receipt.
- Parts are barcoded and labeled prior to being placed into inventory.
- Min/Max levels are maintained for all parts.
- Re-order reports are generated daily to ensure adequate stock levels.

I. Inventory Security

Locations will be graded on establishment of and adherence to specific security procedures by local team. Procedures should include, but are not limited to, the following:

- The inventory is secured (locked down) if Parts Clerk or Parts Manager is not present, or the positions are not assigned to the location.

- The Shift Supervisor/lead person will be responsible for issuing parts if stockroom is not manned at any time.
- A Technician is not permitted to issue his own parts unless he is the senior or only technician on duty.
- No part is issued without a active/open worker order number for the vehicle
- All parts issued are assigned to work orders during the shift when the part is issued.
- Only authorized personnel have access to the parts room.

The maximum score of 5 corresponds to a location with either 100% compliance with all criteria listed above or a comparable and comprehensive inventory security plan in place.

J. Hazardous Materials Handling and Storage

Locations will be graded on the proper storage and labeling of hazardous materials, presence and accessibility of MSDS logs, adherence to Transdev environmental policy protocols and procedures, and compliance with Federal, State, and Local regulations.

- Hazardous materials are properly labeled, stored, and secured at all times.
- A "Right to Know" center is clearly accessible to all employees.
- MSDS book is complete and up to date.

Section 6: Maintenance Cost Control

A. Network FASTER Software Use

Locations will be graded on the COMPLETE and ACCURATE use of Network FASTER software (where applicable) or an equivalent MMS package (either company or client-provided). The auditor may request report samples, files, training records, or other documentation to determine and support the scoring. A complete and accurate vehicle list, including all revenue and non-revenue/support vehicles, must be available and reviewed by the auditor.

The maximum score of 5 represents a location which meets all the criteria above and demonstrates superior command of the software in daily use and in EOP processing and is able to produce a complete and accurate vehicle listing.

B. Labor Cost Management

Locations will be graded on the Auditor's comparison of current headcount to current budget and the following criteria:

- Overtime worked against budget, previous month.
- Actual maintenance labor cost against budget YTD. 4% overage is an acceptable margin. Overages in excess of 4% will require explanation and possible corrective action.
- Ratio of productive personnel to support personnel cost. Productive personnel are defined as technicians working on vehicles. Support personnel are any Supervisor or Clerk positions. The preferred ratio is 70-75% productive to 25-30% support.

The maximum score of 5 corresponds to a location with 100% compliance with all criteria listed above.

C. Personnel Management

Locations will be graded on proper training, licensing, and certifications of shop personnel. Training records are to be reviewed, as well as certification files and wall certificates. All

personnel must have documentation that they meet or exceed Transdev training requirements for their position and responsibilities. All licenses and certifications, including CDL's, must be current. Training records must be reflective of current Transdev standards and requirements.

The maximum score of 5 corresponds to a location with 100% compliance with all criteria listed above.

D. Parts Usage

Locations will be graded on ability to keep part usage within 4% of monthly/annual budget during the previous 12-month period. In addition, national accounts should be utilized, or documentation should be present relating why they are not acceptable. All national accounts being used should be listed in remarks section.

The maximum score of 5 corresponds to a location with 100% compliance with all criteria listed above.

E. Fluid Usage/Inventory Accuracy

Locations will be graded on fluid usage and inventory. Fluid usage should be reconciled to a perpetual inventory and recorded on repair orders. The Auditor must record CPM for all fluids and compared it against the benchmark for like fleets.

The maximum score of 5 corresponds to a location with proper management of fluids.

F. Tire Management

Locations will be graded on the presence of a viable tire and re-cap tire program. Tires should be inventoried and controlled properly. The location should use the current National Account Program.

The maximum score of 5 corresponds to a location with a viable tire program with CPM of $0.05 or lower.

G. Shop Supplies/Inventory Level

Locations will be graded on the levels of shop supplies and inventory. The supplies and expendable inventory should be controlled properly, and the current "National Accounts" should be used.

The maximum score of 5 corresponds to a location with 100% compliance with all criteria listed above.

H. Outside Services

Locations will be graded on their use of outside services. Outside services should be re-bid each year, and the best value in outside services should be analyzed properly. The Auditor will determine the location's ratios, which will vary depending on site-specific issues and contractual obligations.

The maximum score of 5 corresponds to a location with 100% compliance with and documentation of all criteria listed above.

I. Environmental Manual

Locations will be graded on the presence and ease of accessibility of the Transdev Environmental Manual. Inspection of the manual must reveal it to be in good condition, and completely updated, in order to score 5 points.

J. Maintenance Policy Manual

Locations will be graded on the presence and ease of accessibility of the Transdev Maintenance Policy Manual. Inspection of the manual must reveal it to be in good condition, and completely updated, in order to score 5 points.

GoRaleigh

ZERO TOLERANCE DRUG AND ALCOHOL POLICY FOR EMPLOYEES IN SAFETY-SENSITIVE JOB FUNCTIONS

Summary: This is a zero-tolerance policy covering this transit system and is applicable to all GoRaleigh/Transdev North America, Inc., employees who are incumbents in safety-sensitive positions, to all applicants or employees who may apply for or who may transfer to a safety-sensitive position and to contractors who perform safety-sensitive job functions. This program was initially installed by this corporation January 1, 1995.

The Drug and Alcohol Program Manager/Designated Employer Representative for this location is Morris Cook, Jr., Safety Manager.

Date this revision of the GoRaleigh/Transdev North America, Inc., Drug and Alcohol Policy was installed at this location: August 1, 2019.

Revision # 1: January 2007
Revision # 2: June 2007
Revision # 3: September 2008
Revision # 4: May 2010
Revision # 5: March 2012
Revision # 6: September 2014
Revision # 7: April 2015
Revision # 8: January 2016
Revision # 9: August 2018
Revision # 10: March 2019
Revision # 11: August 2019

I. INTRODUCTION

GoRaleigh/TRANSDEV is dedicated to providing safe, dependable transportation services to our passengers. We are also dedicated to providing a safe, drug and alcohol-free workplace for our employees.

Drug and alcohol testing is mandated by the Federal Transit Administration (FTA) and the U.S. Department of Transportation (DOT) in 49 CFR Part 40, and Part 655, as amended. In addition, drugs are prohibited in the workplace by the "Drug-Free Workplace Act of 1988." The regulations implementing this Act are located in 49 CFR Part 29. GoRaleigh/TRANSDEV is required to comply with these regulations. The following policy and procedures will apply to you based upon the job functions you perform for GoRaleigh/TRANSDEV.

This program became effective on January 1, 1995.

II. POLICY ADOPTION

The TRANSDEV Board of Directors has adopted this policy.

Note: Additional requirements and/or disciplinary actions established under GoRaleigh/Transdev's own authority are entered in *ITALICS.*

III. EMPLOYEE CATEGORIES SUBJECT TO TESTING

Employees subject to the provisions of the anti-drug and alcohol misuse prevention program are all safety-sensitive classifications. Safety sensitive function means any of the following duties, when performed by employees of GoRaleigh/TRANSDEV or its contractors or sub-contractors:

1. Operating a revenue service vehicle, including when not in service;
2. Operating a non-revenue service vehicle, when required to be operated by a CDL holder;
3. Controlling dispatch or movement of a revenue service vehicle;
4. Maintaining (including repairs, overhaul and rebuilding) a revenue service vehicle or equipment used in revenue service;
5. Carrying a firearm for security purposes.

A list of the job titles specifically considered to be safety sensitive is contained in Appendix A.

Supervisors are subject to the provisions ***only*** if they perform, or may be called upon to perform a safety-sensitive function.

Participation in the drug and alcohol testing program and submission to drug and alcohol testing administered in accordance with part 655 is a requirement of each safety sensitive employee, and therefore, is a condition of employment.

IV. PROHIBITED BEHAVIOR

The DOT-prohibited drugs – marijuana, cocaine, opioids, amphetamines/ methamphetamines (including MDMA(Ecstasy)), and PCP are always illegal and employees are prohibited from consuming any of them at any time.

The "opioid" category will continue to test for codeine, morphine, and heroin; however, the "opioid" testing panel will now be expanded to include four (4) new semi-synthetic opioids:

1. (1) Hydrocodone, (2) Hydromorphone, (3) Oxycodone, and (4) Oxymorphone.
2. Common brand names for these semi-synthetic opioids include, but may not be limited to: OxyContin®, Percodan®, Percocet®, Vicodin ®, Lortab®, Norco®, Dilaudid®, Exalgo®.

In addition, under the Drug-Free Workplace Act, the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the workplace is prohibited at any time. Use of prescription drugs which may impair job performance or mental or motor function by an employee or any other person to whom this Policy applies while on company premises or in the course of conducting company business, including while subject to being on-call in a paid status, at lunch or on breaks, is strictly prohibited. Employees covered by this policy can be tested for prohibited drugs anytime while on duty.

Safety sensitive employees may not use alcohol from any source while on duty, within four (4) hours prior to performing safety-sensitive duty, while subject to being on-call in a paid status, or within eight (8) hours following an accident requiring an alcohol test, unless the test was completed within eight hours. *The possession or use of alcohol on company premises or while in the course of conducting company business is strictly prohibited.*
GoRaleigh/Transdev North America, Inc. strongly encourages employees to abstain from alcohol consumption for at least 8 hours prior to performing safety sensitive duties.

Alcohol tests may only be conducted just before, during, or just after an employee's performance of a safety-sensitive function. Covered employees are

prohibited from performing or continuing to perform a safety-sensitive function while having an alcohol concentration of 0.04 or greater.

V. NOTICE OF CONVICTIONS

It is the policy of GoRaleigh/TRANSDEV that employees notify the company within 5 days of any criminal drug statute conviction for a felony or misdemeanor violation occurring in the workplace. Within 30 days, GoRaleigh/TRANSDEV will make a determination of action based upon the incident. Employees convicted of drug offenses will be subject to discipline up to and including termination.

VI. EMPLOYEE SELF-REFERRAL INTO A SUBSTANCE ABUSE TREATMENT PROGRAM

It is GoRaleigh/Transdev's policy that a safety sensitive employee may refer himself or herself, prior to being notified of or otherwise subject to an upcoming substance abuse test, into a substance abuse program, by reporting his or her substance abuse problem to their Department Director, Human Resources, or the General Manager. They shall then make a referral to a substance abuse counselor/clinician with the Employee Assistance Program (EAP) and place the employee on unpaid Administrative Leave.

It shall then be the employee's responsibility to take steps to qualify immediately for leave under the Family and Medical Leave Act for treatment. FMLA may only be taken for substance abuse treatment provided by a health care provider or by a provider of health care services on referral by a health care provider. Absence because of the employee's use of the substance, rather than for treatment, does not qualify for FMLA leave. Paid benefit time shall be available to the employee as set forth by the Company's FMLA Policy and the current Labor Agreement. Employees can seek treatment referrals at no cost through EAP's substance abuse counselor/clinician. Employees may also seek a referral through their primary care physician or other means as outlined in their health insurance plan. Employees should contact their healthcare plan provider to understand the benefits available to them.

If an employee seeks treatment through the Employee Assistance Program (EAP), it is mandatory that an employee sign a waiver that will allow the substance abuse counselor/clinician to update the Company on the progress of the employee's treatment.

If an employee seeks direct substance abuse treatment provided by a health care provider or by a provider of health care services on referral by a health care provider, foregoing the Employee Assistance Program (EAP), the employee or their healthcare provider is required to provide updates and documentation to the

Company demonstrating their active participation in their prescribed plan.
Once notice has been received from a substance abuse counselor, primary care physician, or inpatient/outpatient substance abuse program administrator, that the employee is ready to return to duty and has been compliant with the prescribed treatment plan, the employee will be required to take a non-DOT Return to Duty test and be subject to non-DOT Follow-Up testing as directed by the substance abuse counselor.
In the instance of a self-referral, the employee will be subject to non-USDOT return-to-duty and follow-up testing modeled using the process described in 49 CFR Part 40. However, all non-USDOT return-to-duty and non-USDOT follow-up tests and all paperwork associated does not constitute a violation of the Federal regulations and will be conducted under the sole authority of GoRaleigh/Transdev on non-USDOT testing forms.

VII. CIRCUMSTANCES FOR TESTING

Any such testing, if done in addition to an FTA required test will be secondary and require totally separate void or breath sample from the FTA test. Policy mandates that employees selected for drug and /or alcohol testing be provided a notification form which documents the referral to testing. The form should specify the type of test required, the date and time the employee was notified, time the employee arrived at the collection site and authority mandating the test. The completed form should be returned to GoRaleigh/Transdev upon completion of the test, and filed for reference. (Formatted notification forms can be found in the Transdev North America, Inc., Safety Policies and Procedures Manual.)

DOT tests must be completely separate from Non-DOT tests in all respects.

A. Pre-Employment

Following a conditional offer of employment, applicants for all safety-sensitive positions will undergo urine drug testing as a condition of employment. Applicants will be notified of the testing requirement during the application process.

A verified negative drug test result is required prior to performing any safety-sensitive functions and is a condition of employment. If the test is cancelled, the applicant must re-take the test and receive a verified negative test result prior to performing any safety-sensitive function. In the event that a pre-employment test is determined by the MRO to be a verified “negative dilute” result, the applicant is required by GoRaleigh/Transdev to re-test, and receive (the equivalent of) a verified negative test result before performing any safety sensitive function. Depending on the level of creatinine reported by the lab, the MRO may order a re-test to be conducted under direct observation. The results of the second test

will be considered the test result of record. Contact your TPA or the corporate Drug and Alcohol Program Manager if there are questions.

Applicants will be asked whether he/she has ever been refused employment because of a positive DOT pre-employment drug or alcohol test. Applicants will be required to provide the name and complete contact information for all DOT covered employers for the previous two years. Applicants are required to provide a consent statement permitting the previous DOT covered employers to release drug and alcohol test results to GoRaleigh/TRANSDEV. Applicants who have previously failed a drug or alcohol test will not be considered for employment until he/she provides proof of having successfully completed a referral, evaluation and treatment plan as described in 49 CFR Part 655.62, subpart G.

Current employees transferring into safety-sensitive positions will not be allowed to perform safety sensitive duties until the employee undergoes a pre- employment drug test with a verified negative result. Additionally, any current employee returning to a safety sensitive position after not performing said safety- sensitive functions for a period of 90 days or more, regardless of the reason, and who has been out of the random pool during this time, must undergo a pre- employment drug test with a verified negative result before performing safety sensitive duties.

B. Reasonable Suspicion

A safety-sensitive employee shall be required to submit to a FTA reasonable suspicion drug and/or alcohol test when a supervisor or company official suspects the employee has used a prohibited drug or misused alcohol. The testing referral will be made by a trained supervisor or company official based upon specific, contemporaneous, and articulable observations concerning the appearance, behavior, speech, or body odor of the employee. A reasonable suspicion test for drugs can be conducted anytime a covered employee is on duty. A reasonable suspicion alcohol test is authorized only if observations are made during, just preceding, or just after the performance of safety-sensitive functions.

It is GoRaleigh/Transdev's policy that in any Reasonable Suspicion circumstance, the supervisor will transport the employee to an appropriate collection site facility and await the completion of the collection procedure. The Supervisor will then transport the employee back to GoRaleigh/TRANSDEV premises, where a spouse, family member, or other individual will be contacted to transport the employee to his/her home. In the event no such individual is available, GoRaleigh/TRANSDEV will transport the employee to his/her home. If the employee refuses to agree to be transported and attempts to operate his/her own vehicle, GoRaleigh/TRANSDEV will make appropriate efforts to discourage the employee from doing so, up to and including contacting local law enforcement officials. Any employee, failing to cooperate with the procedures described above, will be subject to disciplinary

action up to and including termination of employment.

It is the policy of GoRaleigh/ TRANSDEV that any employee required to submit to a reasonable suspicion test may not perform safety sensitive duties pending the outcome of the drug and/or alcohol test. The employee will be placed on an Administrative Suspension pending the results of the drug tests. Employees placed on an Administrative Suspension must be in a position to be easily contacted by G o R a l e i g h / TRANSDEV once the results of the Substance Abuse Test are reported. Employees who cannot be easily contacted within a reasonable time period will be considered to have abandoned their job and are subject to termination.

If the employee tests negative, he or she may return to work in their position and will be reimbursed for any regularly assigned work lost.

C. Post-Accident (FTA)

All safety-sensitive employees will be required to undergo FTA post-accident drug and alcohol tests if they are involved in an accident with a Public Transportation vehicle (regardless of whether or not the vehicle is in revenue service) that results in a fatality. This includes all surviving safety-sensitive employees that operated the vehicle and any other whose performance could have contributed to the accident.

In addition, if the public transportation vehicle is a bus, electric bus, van or automobile (in the capacity of a Commercial Motor Vehicle) the driver (whether employee or contractor) will be required to undergo FTA post-accident drug and alcohol tests if an accident results in injuries requiring immediate transportation to a medical treatment facility, or one or more of the vehicles involved incur disabling damage and had to be towed away. In a non-fatality situation, testing may be waived if the operator can be completely discounted as a contributing factor to the accident, based upon the information available at the time of the decision. All other covered employees whose performance could have contributed to the accident will also be required to undergo FTA post-accident drug and alcohol tests.

If the vehicle is a van or automobile (not in the capacity of a Commercial Motor Vehicle-not transporting passengers in revenue service) the driver (whether employee or contractor) will be required to undergo a Non-DOT post-accident drug and alcohol tests if an accident results in injuries requiring immediate transportation to a medical treatment facility, or one or more of the vehicles involved incur disabling damage and had to be towed away. In a non-fatality situation, testing may be waived if the operator can be completely discounted as a contributing factor to the accident, based upon the information available at the time of the decision. All other covered employees whose performance could

have contributed to the accident will also be required to undergo a Non-DOT post-accident drug and alcohol tests.

Post-accident alcohol tests will be conducted as soon as possible following the accident. If the post-accident alcohol test is not completed within two hours of the accident, the company will file a report as to the reason why. If the post-accident alcohol test is not completed within eight hours of the accident, the company will cease attempts to obtain a specimen and update the two-hour report as to why. Post-accident drug tests will be conducted as soon as possible, but no longer than 32 hours following the accident. If the company is unable to conduct the drug test within 32 hours, it will document the reason for the inability to test.

If GoRaleigh/TRANSDEV is unable to perform post-accident tests within the required period of compliance, GoRaleigh/TRANSDEV will use the test results administered by Federal, State or local law enforcement personnel under its own authority, provided the results are obtained by GoRaleigh/TRANSDEV in conformance with the law.

Any covered employee subject to post-accident testing who fails to remain readily available for such testing, including notifying the company of his or her location if he or she leaves the scene of the accident prior to submission to such test, will be deemed by the company to have refused to submit to the post- accident testing.

Accident testing is stayed while the employee assists in resolution of the accident or receives medical attention following the accident.

Any safety-sensitive employee involved in an accident must refrain from alcohol use for eight hours following the accident or until he/she undergoes a post-accident alcohol test. Any safety sensitive employee who leaves the scene of an accident without justifiable explanation prior to submission to drug and alcohol testing will be considered to have refused the test.

It is GoRaleigh/Transdev's policy that an employee may be placed on an Administrative Suspension at the discretion of the Company pending the results of post-accident drug tests. Employees placed on an Administrative Suspension must be in a position to be easily contacted by GoRaleigh/TRANSDEV once the results of the Substance Abuse Test are reported. Employees who cannot be easily contacted within a reasonable time period will be considered to have abandoned their job and are subject to termination.

D. Random

Employees in safety sensitive positions will be subjected to random, unannounced and unpredictable testing for drugs and alcohol. GoRaleigh/TRANSDEV's third party administrator will select employees for

random drug and alcohol tests that will met the minimum requirements set by the FTA (currently 50% for drugs and 10% for alcohol, annually). The selection of safety-sensitive employees for random drug and alcohol testing will be made using a scientifically valid method that ensures each covered employee has an equal chance of selection each time selections are made. Management does not have any discretion as to who will be selected. The random tests will be unannounced and spread throughout the year, the random period, all days of the week, and all hours when safety sensitive functions are performed. Random drug tests may occur at any time the employee is on duty. Random alcohol tests may only occur just before, during, or just after the employee performs safety-sensitive work. Employees are required to proceed immediately to the collection site upon notification of their random selection.

Random Testing – End of Shift

Random testing may occur anytime an employee is on duty so long as the employee is notified prior to the end of the shift. Employees who provide advance, verifiable notice of scheduled medical or child care commitments will be random drug tested no later than three hours before the end of their shift and random alcohol tested no later than 30 minutes before the end of their shift. Verifiable documentation of a previously scheduled medical or child care commitment, for the period immediately following an employee's shift, must be provided at least 72 hours before the end of the shift.

E. Return to Duty and Follow-Up Testing

In general, GoRaleigh/TRANSDEV has a "zero tolerance" policy. However, in the event that an employee who has previously violated the policy is allowed to return to work for any reason, he or she will be required to complete the return-to-duty process. This includes evaluation by a SAP, successful completion of the rehabilitation, treatment or education program outlined by the SAP, and obtaining a verified negative return-to-duty drug test and/or alcohol test under 0.02.

In addition, upon return to work, the employee will be subject to follow-up testing for drugs and/or alcohol for a minimum period of 12 months to a maximum of five years. The minimum number of tests during the first 12 months is six. Although they are both unannounced, follow-up testing is apart and separate from random testing. The duration and frequency of testing will be designated by the SAP, but the actual follow-up testing dates will be decided by the employee's manager or supervisor. Effective August 25, 2008: Follow-up and Return-to-Duty drug tests must be conducted using direct observation procedures. *(Authority: Final Ruling United States Court of Appeals **FOR THE DISTRICT OF COLUMBIA CIRCUIT** Argued March 26, 2009 Decided May 15, 2009, No. 08-1264)*

Under GoRaleigh/TRANSDEV authority, the requirements for return-to-duty and follow-up testing will apply to any employee who completes a self-referred

substance abuse program. (Return to Duty and Follow Up testing conducted under GoRaleigh/Transdev North America, Inc., authority will be conducted using a non-DOT chain of custody form Contact your Corporate Drug and Alcohol Program Manager if there are questions.)

BEHAVIOR THAT CONSTITUTES A TEST REFUSAL

Behavior that constitutes a test refusal includes the following:

(1) Fail to appear for any test (except a pre-employment test) within a reasonable time, as determined by the GoRaleigh/Transdev DER.
(2) Fail to remain at the testing site until the testing process is complete. An employee who leaves the testing site before the testing process commences for a pre-employment test has not refused to test.
(3) Fail to attempt to provide a breath or urine specimen. An employee who does not provide a urine or breath specimen because he or she has left the testing site before the testing process commenced for a pre-employment test has not refused to test.
(4) In the case of a directly-observed or monitored urine drug collection, fail to permit monitoring or observation of your provision of a specimen.
(5) Fail to provide a sufficient quantity of urine or breath without a valid medical explanation.
(6) Fail or decline to take a second test as directed by the collector or GoRaleigh/Transdev DER. for drug testing.
(7) Fail to undergo a medical evaluation as required by the MRO or GoRaleigh/Transdev's DER.
(8) Fail to cooperate with any part of the testing process.
(9) Fail to follow an observer's instructions to raise and lower clothing and turn around during a directly-observed test.
(10) Possess or wear a prosthetic or other device used to tamper with the collection process.
(11) Admit to the adulteration or substitution of a specimen to the collector or MRO.
(12) Refuse to sign the certification at Step 2 of the Alcohol Testing Form (ATF).
(13) Fail to remain readily available following an accident.

As a covered employee, if the MRO reports that you have a verified adulterated or substituted test result, you have refused to take a drug test.

As a covered employee, if you refuse to take a drug and/or alcohol test, you incur the same consequences as testing positive and will be immediately removed

from performing safety-sensitive functions, and referred to a SAP.

A refusal to test constitutes a violation of this policy and carries the same consequences as a positive test result. Any employee who refuses to submit to any drug or alcohol test will be removed from safety sensitive work, provided educational materials, and referred to a substance abuse professional. *It is GoRaleigh/Transdev's policy that refusal to submit to any drug or alcohol test will also result in termination of employment*.

VIII. TESTING PROCEDURES

All drug and alcohol testing will be conducted in accordance with 49 CFR Part 40, as amended, which ensures the protection of the employee and the integrity of the testing process. A copy of this document is available for your review from either the corporate or the local Drug and Alcohol Program Administrator upon request. Following is a brief description of the drug and alcohol testing methodology.

A. Drug Testing Methodology

Testing for drugs will be conducted by urinalysis.

1. Initial Test: Initial testing will be performed on the primary sample using the EMIT Immunoassay technique. If the results are negative, no further testing will be required and a report will be provided to the Medical Review Officer (MRO). The MRO is responsible for evaluating, interpreting, and verifying laboratory test results and communicating them to GoRaleigh/TRANSDEV.

2. Confirmation Test: Whenever a positive result is obtained on the initial test, confirmation testing will be automatically performed using the state-of-the-art Gas Chromatography/Mass Spectrometry (GC/MS) or Liquid Chromatography/Mass Spectrometry (LC/MS). Results of confirmation testing will be sent to the Medical Review Officer (MRO).

Specimen Dilutes: A dilute specimen is a specimen with creatinine and specific gravity values that are lower than expected for human urine. If the test is reported as a **dilute positive**, the test should be treated as a verified positive test result. If the test is reported as **a negative dilute**, GoRaleigh/Transdev North America, Inc. will direct the employee to take another test. The retest must not be conducted under direct observation, unless otherwise instructed by the MRO. Since federal regulations give discretion in this manner, GoRaleigh/Transdev North America, Inc., has established the policy that retests will be required for negative dilutes. The second test will be considered the test of record. All employees must be treated the same for this purpose and must be informed in advance of the policy. Questions should be directed to the MRO, Drug and Alcohol TPA or the Corporate Drug and Alcohol Program Manager.

Validity Testing: The laboratory will conduct validity testing to determine if the specimen has been adulterated, tampered with, or diluted. If the MRO reports a "negative-dilute" test result with creatinine levels greater than or equal to 2mg/dL but equal to or less than 5 mg/dL, the employee will be required to take a second test immediately under direct observation with no advance notice. If the MRO reports a "negative-dilute" test result with creatinine levels greater than 5 mg/dL, the employee will be required to take a second test immediately (not observed) with no advance notice.

Drug Testing Split Specimen: The urine specimen collected for FTA testing will be split and poured into two specimen bottles. This provides the employee or applicant with the option of having an analysis of the split sample performed at a second laboratory that meets the requirements of 49 CFR Part 40. The employee or applicant has 72 hours after being informed by the MRO of a verified positive, adulterated, or substituted test result to request a test of the split sample. In the case of invalid test results, no split specimen testing is authorized by DOT. All requests for split specimen analysis will be processed by the MRO.

It is GoRaleigh/Transdev's policy that employees awaiting the result of a split specimen test following a verified positive, adulterated, or substituted test result may not perform safety sensitive duties pending the outcome of the split specimen test. The employee will be placed on an Administrative Suspension pending the result of the split specimen test. Employees placed on an Administrative Suspension must be in a position to be easily contacted by GoRaleigh/TRANSDEV once the result of the split specimen test is reported. Employees who cannot be easily contacted within 72 hours will be considered to have abandoned their job and are subject to termination. GoRaleigh/Transdev will seek payment or reimbursement for the cost of the split specimen from the employee, should the employee request testing of the split sample.

B. Alcohol Testing Methodology

Testing for alcohol will be conducted by breath analysis. Alcohol tests will be performed by a breath alcohol technician (BAT) who is trained to proficiency in the operation of the Evidential Breath Testing device being used and in the alcohol testing procedures specified in the Federal regulations.

1. Initial Test: If the result of the initial test is an alcohol concentration of less than 0.02, no further testing is required and the test will be reported to GoRaleigh/TRANSDEV as a negative test.

2. Confirmation Test: If the result of the screening test is an alcohol concentration of 0.02 or greater, a confirmation test will be performed. The confirmation test will be conducted at least 15 minutes, but not more than 30 minutes, after the completion of the initial test. This delay prevents any

accumulation of alcohol in the mouth from leading to an artificially high reading. The employee is strongly advised not to eat, drink, belch, or put any object or substance into his or her mouth while awaiting the confirmation test.

3. If the initial test and the confirmation test results are not identical, the confirmation test is deemed to be the final result.

4. The alcohol breath sample is to be taken BEFORE the drug specimen is collected, in such cases that warrant both a drug collection and a breath alcohol sample.

C ATTRIBUTING TEST RESULTS TO THE CORRECT COVERED EMPLOYEE (DRUG AND ALCOHOL COLLECTIONS AND TESTING)

Procedures that ensure that the test results are attributed to the correct covered employee include utilizing a chain of custody to ensure that each specimen is monitored throughout the collection process during both drug and alcohol collection and testing procedures.

IX. CONSEQUENCES OF DRUG USE AND THE MISUSE OF ALCOHOL

Any covered employee who has a verified positive drug test, an alcohol test result of 0.04 or above, or has refused to submit to a drug or alcohol test (including substitution or adulteration) will be immediately removed from his or her safety sensitive position, provided educational materials, and referred to a Substance Abuse Professional (SAP). *It is GoRaleigh/Transdev's policy that positive drug or alcohol tests or refusal to test will also result in termination of employment.*

Any safety sensitive employee found to have an alcohol concentration of 0.02 or greater but less than 0.04 will not perform, nor be permitted to perform, a safety- sensitive function for at least 8 hours following administration of the breath alcohol test, or if the employee was re-tested, the result was less than 0.02.
Is GoRaleigh/Transdev's policy that testing positive for alcohol on a return-to-duty breath alcohol test will result in termination of employment.

A. LIFE CONSEQUENCES OF ALCOHOL MISUSE

The chronic consumption of alcohol (average of three servings per day of beer, whiskey, or wine) over time may result in the following life consequences:

***Health**: decreased sexual functioning, dependency on alcohol, fatal liver disease,*

increased cancers of the mouth, tongue, pharynx, esophagus, rectum, breast, and malignant melanoma, kidney disease, pancreatic dysfunctions, spontaneous abortion and neonatal mortality, ulcers, and birth defects.

***Work**: the effects of alcohol misuse on an individual's work include impairment in coordination and judgment, and increased likelihood of having an accident than that of a sober person.*

***Personal Life**: the effects of alcohol misuse on an individual's personal life include increased exposure to committing homicides, vehicle accidents, family problems including separation and divorce, increased likelihood of committing suicide, and greater exposure to other forms of accidents.*

***Signs and Symptoms**: dulled mental processes, lack of coordination, odor of alcohol on breath, possible constricted pupils, sleepy or drowsy condition, slowed reaction rate, and slurred speech.*

When an alcohol problem is suspected, the available methods of intervention include the availability of a crisis response/employee assistance service offered by Substance Abuse Counselors that address family problems as well as substance abuse.

B. EMPLOYEE EDUCATION, TRAINING AND ASSISTANCE

PROGRAM SUPERVISOR TRAINING

Any supervisory personnel responsible for determining whether an employee must be tested for substance abuse based on Reasonable Cause/Suspicion will be required to complete at least one (1) session (2 hours) of training on the specific contemporaneous physical, behavioral, and performance indicators of probable drug/alcohol use. One 60-minute session will be devoted to indicators of probable alcohol use and one 60-minute session will be devoted to indicators of probable drug use.

Positions to receive training under this plan are: All Managers, Supervisors, First Line Dispatchers and Foremen. Training will be provided by qualified personnel or processes designated by GoRaleigh/Transdev North America, Inc.

EMPLOYEE EDUCATION

GoRalrigh/Transdev will provide an education program for its employees, which will include the following:

- Display and distribution of informational material on substance abuse;
- Display and distribution of a community service hot-line telephone number

for employee assistance; and

- Display and distribution of Go Raleigh/ Transdev's Substance Abuse Plan regarding the use of prohibited drugs and/or alcohol.
- Covered employees must 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.
- Periodic updates and refresher training concerning substance abuse, life consequences and policy adherence.

X. PRESCRIPTION AND OVER THE COUNTER

MEDICATIONS MRO VERIFICATION OF PRESCRIPTIONS

When a tested employee is taking a prescribed medication, after verifying the prescription and immediately notifying the employer of a verified negative result,the MRO must then (after notifying the employee) wait five (5) business days to be contacted by the employee's prescribing physician before notifying the employer of a medical qualification issue or significant safety risk.

Specifically, in cases where an MRO verifies a prescription is consistent with the Controlled Substances Act, but that the MRO has still made a determination that the prescription may disqualify the employee under other USDOT medical qualification requirements, or that the prescription poses a significant safety-risk, the MRO must advise the employee that they will have five (5) business days from the date the MRO reports the verified negative result to the employer for the employee to have their prescribing physician contact the MRO. The prescribing physician will need to contact the MRO to assist the MRO in determining if the medication can be changed to one that does not make the employee medically unqualified or does not pose a significant safety risk. If in the MRO's reasonable medical judgment, a medical qualification issue or a significant safety risk still remains after the MRO communicates with the employee's prescribing physician, or after five (5) business days, whichever is shorter, the MRO must communicate this issue to the employer consistent with 49 CFR Part 40.327.

It is Go Raleigh/ Transdev's policy that all safety sensitive employees must notify the Company in writing when they are taking prescription or non- prescription medication that may interfere with their ability to perform work safely. Failure to do so will result in disciplinary action up to and including termination of employment.

There is only one approved method of notification. Employees must use the Prescription / Non-Prescription notification form to inform the company of any medications used; as defined by Prescription and Over-The-Counter sections below.

Employees are required to obtain a Prescription / Non-Prescription Medication Notification Form, signed by a licensed Physician, licensed Physician Assistant, licensed Pharmacist, or licensed Registered Nurse, for each prescription medication taken by the employee. This form must indicate if the medication(s) will impair the employee's ability to safely perform safety sensitive function and/or operate a motor vehicle. This includes any medication that may cause drowsiness, dizziness, impaired vision, etc. The employee will provide the form to the physician or prescribing individual. The employee is required to advise the physician or prescribing individual of the safety-sensitive nature of his or her job. The employee is also encouraged to ask for alternative treatments that do not have performance altering side effects.

GoRaleigh/Transdev's Drug and Alcohol policy in no way implies that taking approved prescription or non-prescription medication will completely eliminate side effects even if determined to be safe by his/her treating physician. It is the employee's

responsibility to fully discuss any and medications with his/her treating physician to reduce possible medication side effect(s).

Employees must submit the Prescription / Non-Prescription Medication Notification Form to the Substance Abuse Program Administrator prior to the beginning of his or her shift, if the Substance Abuse Program Administrator is not available, forms must be turned in to the appropriate Department Manager, Supervisor, or Foreman on duty.

***Over-the-Counter Medications** should be taken with extreme caution.*

- *Read all the warning labels before selecting a medication for use while performing safety sensitive functions.*
- *If the label has warnings such as "do not take this medication while operating a motor vehicle, may cause drowsiness, etc." select another medication.*
- *If unsure which medication is safe to take while performing your job, ask your pharmacist. If still unsure, contact your physician for a suitable alternative.*
    - *If no suitable alternative is available, have your Physician complete a Prescription / Non-Prescription Medication Notification Form and submit the form to the Substance Abuse Program Manager, supervisor or manager. This form must indicate if the medication(s) will impair the employee's ability to safely perform safety sensitive function and/or operate a motor vehicle.*
- *Ultimately, you are responsible for ensuring your safety and the safety of your co-workers and customers. Taking medication while performing your duties can impair your ability to meet this obligation.*

Falsification of the Prescription / Non-Prescription Medication Notification Form in

any way is cause for immediate termination.

During normal business hours a determination can usually be made immediately as to whether an employee will be allowed to work. If an immediate determination cannot be made, a Medical Review Officer (MRO) will be notified and will make a determination as to an employee's ability to safely work.

Employees will not be allowed to clock in until the Substance Abuse Program Administrator or the MRO has made a determination. All normal rules and regulations applying to Miss Outs, No Call No Shows, and Unauthorized Absences shall apply. Employees shall be allowed to use available PTO, EPTO, and vacation until they are cleared to return to work. All normal rules and regulations regarding the scheduling of PTO, EPTO, and vacation may apply.

XI.RECORD KEEPING

DRUGS & ALCOHOL

Records will be maintained as detailed in 49 CFR part 40 and Part 655, as revised.

A. RECORDS MAINTAINED FOR ONE (1) YEAR:

1. *Records of Verified Negative and canceled Drug Test Results:*
2. *Alcohol test results with a concentration of less than 0.02*
3. *GoRaleigh/Transdev's copy of custody and control form.*

B. RECORDS MAINTAINED FOR TWO (2) YEARS:

1. *Records Related to the Collection Process:*
2. *Education and Training Records:*

C. RECORDS MAINTAINED FOR THREE (3) YEARS

Information from previous employers concerning drug and alcohol test results

D. RECORDS MAINTAINED FOR FIVE (5) YEARS:

1. *Records of covered employee alcohol test results indicating an alcohol concentration of 0.02 or greater*
2. *Records of covered employee positive controlled substances test results*

3. *Documentation of refusals to take required alcohol and/or controlled substances tests*
4. *Records related to the administration of the alcohol and controlled substances testing programs*
5. *Covered Employee Referrals to Substance Abuse Professional for Return To Duty and Follow Up:*
6. *Annual MIS Reports.*

E. *REQUIREMENTS FOR RECORDS AND SPECIMEN STORAGE BY LAB, MRO, AND GoRaleigh/TRANSDEV TRANSPORTATION.*

Records are maintained for program administration and test results of individuals for whom G o R a l e i gh / Transdev North America, Inc. has testing responsibility. Upon completion of the collection process, the specimen is to be placed in secure storage until dispatched to the laboratory. The MRO is to maintain all necessary records and send test result reports to GoRaleigh/Transdev Substance Abuse Program Administrator (DER), who maintains records in a secure location with controlled access. All negative test results will be maintained for a period of no less than one year. All positive test results will be maintained for a period of no less than five years.

In acknowledgment of the nature of the Company's operations and overriding safety considerations, the Company has adopted formal provisions for drug and alcohol screening as reference in the Employee Handbook. *The Company policy is zero tolerance. A positive test as define by the FTA regulations at 49 CFR part 655 and 49 CFR part 40 will result in termination. The Union agrees to the foregoing Drug and Alcohol Policy if the policy has not been found to be in violation of any Federal or State laws and the scope of the application and enforcement does not exceed that which is required by these regulations.*

An employee removed from duty because of reasonable suspicion compliance with these regulations will be placed on leave without pay for a maximum of three days pending the results. In the event the results are negative, the employee will be made whole of any lost wages. Any action required by the Company as a result can be taken at that time.

XII. IDENTITY OF CONTACT PERSONS

A. Corporate Drug and Alcohol Program Manager

Carolina Lagunas
Corporate Drug and Alcohol Program Manager
720 E. Butterfield Rd, Suite 300
Lombard, IL 60148
Telephone: (630) 606-0839
Fax: (331) 315-2071
Email: Carolina.Lagunas@Transdev.com

B. Primary Drug and Alcohol Program Manager (DER) (GoRaleigh)

Name: Morris Cook
Title: Safety Manager
Address: 4104 Poole Rd
Raleigh, NC 27610
919-996-3880: OFFICE
919-745-0451: CELLULAR

C. Alternate Drug and Alcohol Program Manager (GoRaleigh)

Name: Laura Bass
Title: Human Resources Manager
Address: 4104 Poole Rd.
Raleigh, NC 27610
919-996-3878

D. Substance Abuse Program Medical Review Officer

Company Name: EDPM

MRO: Dr. Paul Teynor
Address: 505 20th Street North, Suite 200
Birmingham, AL 35255
Phone: 205-326-3100
FAX: 205-380-2502

E. Corporate Drug and Alcohol Third Party Administrator

Name: Sterling

Address: 6111 Oak Tree Blvd
Independence, OH 44131

Telephone: 216-685-7422 direct | 800-853-3228 toll free | 216-685-7470 fax

Sterling Customer Service Directory:

John Hilton – Customer Service Representative
1-800-853-3228
Option 1 Extension 6560
John.Hilton@Sterlingcheck.com

Donna Piros – Random Administrator
1-800-853-3228 Option 1 Extension 57426
DID: 1-216-685-7426
Donna.Piros@Sterlingcheck.com

Liz Lastafka – Drug Screening Manager
1-800-853-3228 Option 1 Extension 57422
DID: 1-216-685-7422
llastafka@sterlinginfosystems.com

F. Testing Laboratory

Name: LabCorp

Name: LabCorp
Address: 1904 Alexander Drive
RTP, North Carolina, 27709
Telephone: (800) 833-3984

G. Employee Assistance Program

Quantum Employee Assistance Program
14 Park Lake Road, Suite 2
Sparta, New Jersey 07871
Customer Service (Employee Assistance): 1-877-747-1200

Appendix A – Safety Sensitive Employees

The following positions are considered to be safety sensitive:

- Vehicle Operators
- Dispatchers
- Mechanics
- Utility Service Workers
- Director of Operations
- Assistant Director of Operations
- Assistant Director of Maintenance
- Director of Maintenance
- Safety Manager
- Training Specialist

Appendix B - Definitions

Adulterated Specimen – A specimen that contains a substance that is not expected to be present in human urine, or contains a substance expected to be present but is at a concentration so high that it is not consistent with human urine.

Alcohol Use – The drinking or swallowing of any beverage, liquid mixture or preparation (including any medication) containing alcohol.

Breath Alcohol Technician – A person who instructs and assists employees in the alcohol testing process and operates an evidential breath testing device.

Cancelled Test – A drug or alcohol test that has a problem identified that cannot be or has not been corrected, or which 49 CFR Part 40 otherwise requires to be cancelled. A cancelled test is neither a positive nor a negative test.

Collector – A person who instructs and assists employees at a collection site, who receives and makes an initial inspection of the specimen provided by those employees, and who initiates and completes the Custody and Control form.

Dilute Specimen – A specimen with creatinine and specific gravity values that are lower than expected for human urine.

Disabling Damage – Damage that precludes departure of a motor vehicle from the scene of the accident in its usual manner in daylight after simple repairs.

1) Inclusion: Damage to a motor vehicle, where the vehicle could have been driven, but would have been further damaged if so driven.
2) Exclusions:

a. Damage that can be remedied temporarily at the scene of the accident without special parts or tools.
b. Tire disablement without other damage even if no spare tire is available.
c. Headlamp or tail light damage.
d. Damage to turn signals, horn, or windshield wipers, which make the vehicle inoperable.

DOT, the Department, DOT Agency – 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.

Evidential Breath Testing (EBT) Device – The NHTSA conforming products list (CPL) for evidential devices are the only devices you may use to conduct alcohol confirmation tests under 49 CFR Part 40.

FTA – The Federal Transit Administration, an agency of the U.S. Department of Transportation.

HHS – The Department of Health and Human Services or any designee of the Secretary, Department of Health and Human Services.

Medical Review Officer (MRO) – A person who is a licensed physician and who is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results.

Public Transportation Vehicle – a vehicle used to transport the public or one used for ancillary services.

Split Specimen – In drug testing, a part of the urine specimen that is sent to a first laboratory and retained unopened, and which is transported to a second laboratory in the event that the employee requests that it be tested following a verified positive test of the primary specimen or a verified adulterated or substituted specimen.

Substance Abuse Professional (SAP) – 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.

Substituted Specimen – A specimen with creatinine and specific gravity values

that are so diminished that they are not consistent with human urine.

Verified Test – A drug test result or validity testing result from an HHS-certified laboratory that has undergone review and final determination by the MRO.

Appendix D

RESOLUTION AUTHORIZING THE ADOPTION OF SUBSTANCE ABUSE POLICY

WHEREAS, the purpose of Transdev's Substance Abuse Policy is to establish guidelines in implementing a drug and alcohol testing program that meets the requirements of the Federal Transit Administration (FTA); and

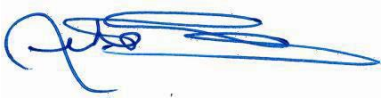
WHEREAS, the goal of the prohibited substance abuse testing program is to achieve a drug and alcohol-free work force in the interest of the health and safety of the employees and the public; and

WHEREAS, participation in the prohibited substance abuse testing program is a requirement of each safety sensitive employee, and, therefore is a condition of employment.

NOT THEREFORE BE IT RESOLVED by the President of TRANSDEV, North America, as follows:

Section 1. That all testing under the FTA requirements are conducted in accordance with 49 CFR Part 40, as revised: Procedures for Transportation Workplace Drug and Alcohol Testing Programs and in accordance with 49 CFR Part 655: Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations; and

Section 2. That the amended policy of Substance Abuse becomes effective on January 01, 2018.



Michael Murray
President, Transdev North America, Inc.

GoRaleigh/TRANSDEV FTA DRUG AND ALCOHOL POLICY
ACKNOWLEDGEMENT OF RECEIPT

I, the undersigned employee of GoRaleigh/TRANSDEV hereby certify that I have been furnished with a copy of Go Raleigh/ Transdev's Substance Abuse Policy for Safety-Sensitive Employees. I understand that should I decide to use the services of the Employee Assistance Program (EAP) for a substance abuse problem, that the EAP is required to notify Go Raleigh/Transdev's Substance Abuse Program Administrator in order to protect my employment. I further certify that I have been provided with informational material, education and training on the dangers and problems of drug and/or alcohol use.

Executed this the_____day of_____, 20_____

_____
Employee Signature

_____
Print Name

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GoRaleigh

PHYSICAL FACILITY ACCESS POLICY

GoRaleigh's facilities contain high value and powerful assets. The management and monitoring of physical access to facilities is extremely important for employee and public safety.

This policy establishes rules for management, control, monitoring, and removal of physical access to GoRaleigh facilities. This policy applies to all GoRaleigh staff, vendors and guests.

1. GENERAL

    1.1. Physical access to all restricted facilities shall be documented and managed. All facilities must be physically protected relative to the criticality or importance of the function or purpose of the area managed.
    1.2. Access to facilities will be granted only to personnel whose job responsibilities require access. Electronic access control systems and keys shall be used to manage access to controlled spaces and facilities.

2. KEY ACCESS AND CARD SYSTEMS FOR EMPLOYEES

    2.1. Access rights shall be based on an employee's role or function in the organization. Key cards and/or keys to restricted areas will be issued to employees by Human Resources. They shall regularly review card and/or key access rights and remove access for employees that no longer require access.
    2.2. Employee access cards and/or keys must not be shared or loaned to others
    2.3. Lost or stolen cards/or keys must be reported immediately to Human Resources.
    2.4. Human Resources shall remove card and/or key access rights of individuals that change roles or are separated from their relationship with GoRaleigh.
    2.5. The Safety Manager or their designee regularly reviews access records and visitor logs for the facility and is responsible for investigating any unusual events or incidents related to physical facility access
    2.6. Only GoRaleigh employees may use employee entrances.
    2.7. Employees should ensure entrance doors close securely.

3. VISITOR, GUEST AND VENDOR ACCESS

    3.1. A sign in/out log shall be maintained at both the public lobby and the maintenance office.
    3.2. Visitor logs shall be used to maintain a physical audit trail of visitor activity to the facility.
    3.3. Visitor logs shall document the visitor's name, the firm represented, and the on-site personnel authorizing physical access on the log.
    3.4. Visitor logs shall be retained for a minimum of three months, unless otherwise restricted by rule, regulation, statute, or GoRaleigh audit control.
    3.5. Visitors shall be identified and given a badge or other identification that expires and that visibly distinguishes the visitors from on-site personnel if they must travel beyond common public areas.
    3.6. Visitors shall surrender their badge or identification before leaving the facility or at the date of expiration.
    3.7. Visitors must be escorted in card access controlled areas of facilities unless granted permission to be unescorted by the General Manager, Assistant General Manager, Director of Operations, Director of Maintenance, Safety Manager or their designee.
    3.8. Visitors shall be escorted at all times within areas where sensitive information or money is processed or maintained.
    3.9. External vendors shall comply with applicable laws and regulations when working in GoRaleigh facilities. An appropriate and technically knowledgeable staff member shall escort the individual to the area where facility maintenance is being performed and ensure that appropriate security procedures are followed. The General Manager, Assistant General Manager or Director of Operations or Maintenance may waive this requirement on a case by case basis.

4. BOMBS AND SUSPICIOUS PACKAGES OR DEVICES, THREATS IN FACILITIES

    4.1. Upon discovery of a package or device of suspicious nature, Employees must take immediate and reasonable steps to notify either the General Manager, Assistant General Manager, Director of Operations, Director of Maintenance, or nearest Supervisor, whomever first available. Employees should Employees should take actions according to instructions provided on Appendix A.
    4.2. Upon receiving a bomb threat, employees must immediately notify either the General Manager, the Assistant General Manager, The Director of Operations, The Director of Maintenance, or nearest Supervisor, whomever first available. Employees should take actions according to instructions provided on Appendix A.
    4.3. The General Manager, the Assistant General Manager, The Director of Operations, The Director of Maintenance or designee shall

communicate with the Transit Administrator regarding the ordering of an evacuation or shelter in place.

5. CONFERENCE ROOMS, TRAINING ROOM ACCESS

5.1. Conference rooms, training rooms and other meeting spaces at GoRaleigh facilities are to be used for GoRaleigh business only and must be reserved to avoid scheduling conflicts.
5.2. Conference rooms, training rooms and other meeting spaces at GoRaleigh facilities are to be locked when not in use.

6. ON-SITE VEHICLE ACCESS

6.1. Access to controlled vehicular areas shall be controlled by electronic gates. Only GoRaleigh employees may use devices to open these gates. GoRaleigh employees must immediately report vehicles that "tail-in" behind GoRaleigh vehicles to Dispatch. GoRaleigh employees must immediately report breaches in fences, gates or barriers to controlled vehicular areas to a Supervisor.
6.2. The following policy applies to visitors and guests who must bring a non-GoRaleigh vehicle into controlled vehicular areas.
6.2.1. Non-GoRaleigh vehicles shall only be allowed into controlled vehicular areas by Dispatch or appropriately authorized Maintenance employees.
6.2.2. Drivers and passengers in non-GoRaleigh vehicles must stop at the front maintenance office and sign a visitor log before proceeding further into controlled vehicular areas. The General Manager, Assistant General Manager or Director of Operations or Maintenance may waive this requirement on a case by case basis for frequent and approved vendors.
6.2.3. Frequent and approved vendors that are allowed to bypass signing-in at the maintenance office must maintain a current list of employees accessing GoRaleigh properties.
6.2.4. All non-GoRaleigh vehicles allowed into controlled vehicular areas must be visually distinguishable with their organization or company. Indistinguishable private vehicles are not allowed.
6.2.5. All non-GoRaleigh vehicles allowed into controlled vehicular areas must follow speed limits and traffic control devices.

7. EMPLOYEE RESPONSIBILITIES

7.1. All GoRaleigh employees are responsible to escort any individual in a secure area who does not have an identification or visitor badge to a visitor log to be properly signed in. If escorting is not possible, employees must notify dispatch or a supervisor of the unidentified person(s) immediately.

7.2. The Properties & Facilities Manager or their designee shall ensure:

7.2.1. Secure areas are protected by appropriate entry and control mechanisms and they are in good working order.

7.2.2. Entry and control mechanisms are properly setup to accommodate holidays, emergency lockdowns or other non-standard needs.

7.2.3. Procedures control and validate a staff member's access to facilities with the use of security personnel, identification badges, or electronic key cards.

7.2.4. Procedures exist that establish visitor controls including visitor sign-in logs and wearing of visitor badges for both entry and exit of GoRaleigh.

7.2.5. A complete inventory of critical assets is maintained with GoRaleigh ownership defined and documented.

7.2.6. Card access records and visitor logs for facilities are kept for periodic review based upon the criticality of the information being protected and security necessity.

7.3. The Operations Department shall ensure:

7.3.1. A Dispatcher or Supervisor secures the Operations Department the end of the day. This includes walking through the facility (including bathrooms) and securing doors. The Director of Maintenance and Safety Manager should be notified if property cannot be properly secured.

8. AUDIT CONTROLS AND MANAGEMENT

8.1. The On-demand documented procedures and evidence of practice should be in place for this operational policy as part of normal GoRaleigh operations. Examples of acceptable controls and procedures include:

- Visitor logs
- Access control procedures and processes
- Operational key-card access and premise control systems
- Operational video surveillance systems and demonstrated archival retrieval of data

9. ENFORCEMENT

9.1. Staff members found in violation of this policy may be subject to disciplinary action, up to and including termination.

POLICY ACKNOWLEDGMENT FORM

I have read the **Physical Facility Access Policy** and agree to comply with the terms and conditions at all times. If at any time following the submission of this form I become aware of any actual or potential non-compliance to these policies, I will promptly notify management.

_____

Printed Name

_____

Signature

_____

Date

Appendix A

Instructions for Handling Bomb Threats by Phone and by Mail

By Phone

Any GoRaleigh employee receiving a bomb threat by phone should remain calm and attempt to obtain and/or relay the following information:

1. Note the time the call is received.

2. Note the caller's number if caller ID is available.

3. Advise the caller that the building is occupied.

4. Ask what time the bomb is set to explode and where it is located (e.g., City Hall, Police Department, Courthouse?)

5. If possible, have another employee notify Emergency Communications.

6. Note in detail what the caller is saying, and try to keep them talking.

7. Try to obtain a description of the bomb. Examples: What does the bomb look like? What kind of bomb is it? What will cause the bomb to detonate? What time will the bomb detonate?

8. Ask who is calling.

9. Ask the caller's location.

10. Note the attitude of the caller (calm, excited, etc.) and try to identify any background noises.

11. When the caller hangs up, find the General Manager, Assistant General Manager, Director of Operations, Director of Maintenance, or nearest Supervisor, whomever first available, if another employee has not already done so, and notify them of the threat.

By Mail

Any GoRaleigh employee receiving a bomb threat by mail should remain calm and attempt to obtain and/or relay the following information:

1. Note the time and method of delivery for the mail item.

2. The employee should remain in place and not hand the mail off.

3. Upon opening the mail, the mail is not to be removed from the area from which it was received when opened.

4. If the mail contains a substance, the mail is not to be removed from the original area it was opened. All employees near the mail are to move to an isolated area and shut the door to the area containing the opened mail.

5. Call 9-1-1 and report the threat without delay.

6. If mail was opened note in detail what the mail contained and describe any substance (if applicable).

7. Note the number of employees who were within the area (now moved to an isolated area away from the

mail) where the mail is held, as well as, describe the location within the building, floor, and office suite.

Mission Essential Function Worksheet

Department:	GoRaleigh (Fixed Route)
Division:	Transportation
Mission Essential Function:	Public transportation/move people/provide temporary climate-controlled shelter

Vital Records: List any documents, records, and/or files that are necessary to fulfill the above mission essential function.

Employee Records (contact info)
Financial Data (shared folder, hard records, credentials)
Fleet Records (fuel, availability records, insurance, registration, preventative maintenance/service records)

Vital Equipment and Technology: List any equipment, systems, and/or technology that is needed to fulfill your identified mission essential function.

Bus Fleet
Fueling facility or stand-alone fueling sources
Support/Shuttle Vehicle Fleet
Two Way Radios, Phones, (Not required, but helpful: AVL/Dispatch software enabled laptops with internet connectivity, AVL server connectivity)

Staff Positions: Please list the staff positions that are essential to the implementation of the above identified mission essential function.

General Manager
Director of Operations; Director of Maintenance; Safety Manager
Dispatchers, Road Supervisors
Bus Operators, Fuelers

Mission Essential Function Worksheet

Departmental Involvement: Please identify any other department or division that has a necessary role in this mission essential function being carried out. This should include both departments internal to the City of Raleigh and any departments from outside jurisdictions.

Transportation, Internal	**Internal or External?**

Facility Accommodations: Please list if there are any exceptional or unique facility accommodations needed to ensure that this mission essential function is fulfilled.

GoRaleigh Operational Facility is ideal. Other large, open, paved or gravel space where we can refuel and perform minimal service, along with a shelter to manage operations, could work.

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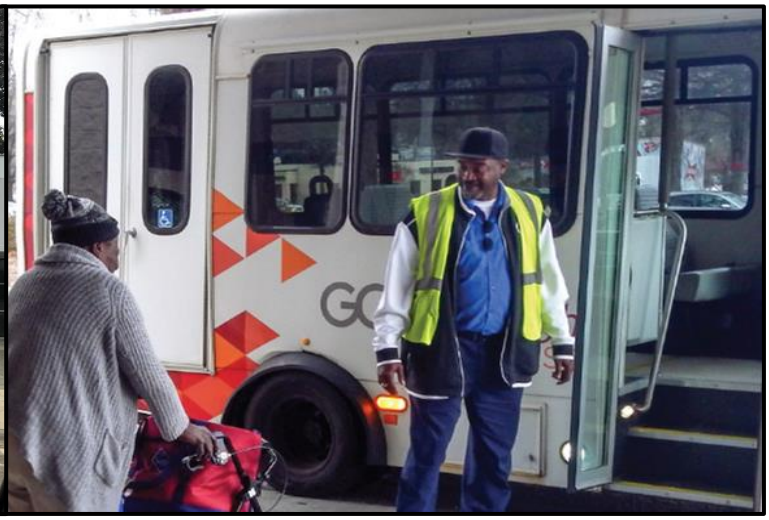


GoRaleigh Access
Public Transportation Safety Plan

Developed in accordance with:
Federal Transit Administration (FTA)
49 CFR Part 673

Services provided by Transportation nc

1. Safety Management Policy

Safety Management System (SMS) Policy Statement

MV Transportation, Inc. is committed to providing the highest level of safety for the public, our employees and contractors. Satisfying our customers' special needs with 100% regulatory compliance and the lowest possible risk is our first operational priority. We will never increase our risk of accident or injury to solve operational problems in the course of providing the *Best Customer Experience*.

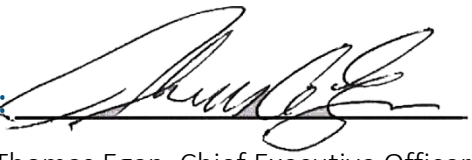
To meet that commitment, MV Transportation has adopted the Safety Management System (SMS) and developed safety policies and activities in support of an effective SMS. This plan is based on the four components of SMS: Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion.

Every employee and contractor are directed and empowered to administer the SMS and its specific activities for the prevention, control, and resolution of unsafe conditions and actions. The primary objectives of this SMS plan are to proactively identify and mitigate safety hazards and risks, promote a positive safety culture, and maintain regulatory compliance.

Our safety objectives are to:

- Ensure that effective safety management systems and processes are integrated into all of our activities.
- Designate an individual responsible for the safety function who reports directly to the Chief Executive Officer of the company and authorize that individual to develop and implement programs to promote safety.
- Ensure all employees and contractors are aware that safety is their primary responsibility and they are held accountable for delivering the highest level of safety in their daily work activities.
- Clearly define the safety accountabilities and responsibilities to all employees and contractors, including the responsibility of managers and supervisors to develop, implement, and enforce safety rules and procedures in their respective work areas.
- Provide all employees and contractors with appropriate safety information and skills training; ensure employee and contractor competence in all safety matters related to their position with the company.
- Develop and embrace a positive safety culture in all of our activities that recognizes the importance and value of effective safety management and acknowledges that safety is the number one operating value in everything we do.
- Ensure a culture of open reporting of all safety hazards, ensuring that no action will be taken against any employee who discloses a safety concern through the proper chain of command, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

- Promote and maintain a positive safety culture with positive recognition and reinforcement of safe behaviors.
- Ensure that all equipment, systems and services meet our safety performance standards through periodic audits and inspections.
- Establish performance metrics and measures of our safety performance against our safety performance indicators and safety performance targets.
- Continually develop and improve our safety processes through actively monitoring, measuring, and reviewing our performance against our objectives and targets.
- Conduct safety and management reviews to improve our safety performance and ensure that relevant and corrective actions are taken.
- Comply with all state and federal regulatory requirements and standards.

Signed:  Date: 10-28-2019

Thomas Egan, Chief Executive Officer
MV Transportation, Inc.

1.1 Commitment to Safety Statement

Providing the highest level of safety for all MV Transportation employees, passengers, and the communities we serve is our core operating value. Safety is at the forefront of delivering the *Best Customer Experience* and is the first of our key components of successful performance.

Doing work safely must be the foundation of all operational activities. Safety standards will never be compromised, subordinated or diminished by any other goal. Safety is the process that drives all functions and activities and is at the center of everything we do at MV Transportation.

MV Transportation is committed to being the safest organization possible and is committed to an incident and injury free workplace and security excellence. We will review and continually improve our practices to continuously drive improvements in safety, health, environmental, and security performance.

Accountability is fundamental to our mission. Every individual at MV is responsible for working and acting safely and embracing safety as a lifestyle. Compliance with this Commitment, applicable laws, and other requirements is the responsibility of every employee and contractor acting on our behalf.

Safety leadership is a core responsibility of management and is the company's most important management value. Managers at all levels will set the standard in our industry, from the Chief Executive Officer to the first-level supervisor.

Every employee is responsible to:

- Promote and maintain a safe work environment for all personnel and our passengers.
- Act consistently to influence safe behaviors and eliminate unsafe behaviors, actions and decisions.
- Go above and beyond the minimum safety standards of his / her job.
- Directly participate in all aspects of our safety program.
- Abide by all applicable safety rules and regulations.
- Work with management to decrease our exposure to risk.
- Immediately report all incidents/accidents and hazards.
- Complete all assigned safety training programs to continuously enhance safety skillset.
- Intervene in an activity if it is observed that its being conducted with an unacceptable level of risk.
- Encourage and reinforce the safe behaviors of others.
- Resolve circumstances responsibly that require corrective action.
- Insist upon an unwavering commitment to safety.

MV leadership is committed to supporting this statement with the resources and accountability necessary to achieve safety excellence.

Tom Egan
Chief Executive Officer
MV Transportation, Inc.

Mark Collins
President and Chief Operating Officer
MV Transportation, Inc.

Contractor Management

It is the responsibility of MV Transportation to ensure that contractor work practices meet established safety standards of the agency and any and all federal, state, and local regulations and requirements. (Safety Policy S-10).

MV Transportation will monitor contractor compliance through scheduled and unscheduled safety audits of equipment, work sites and practices, regulatory compliance, and required records. Significant violations, especially in areas of safety, will be addressed by the appropriate management person, and may include termination of the contract or other legal action.

1.2 Safety Management System Development

This Safety Management System (SMS) plan was developed to outline our systematic procedures, practices, and policies for managing risks and hazards. Additional plan elements are available as references to support the information outlined in this document.

Key definitions of our process throughout our Safety Risk Management includes the following:

- A **hazard** is a condition or object with the potential of causing injuries to personnel, damage to equipment or structures, loss of material, or reduction of ability to perform a prescribed function. The potential for harm is defined as **safety risk**. It refers to the chance that people, equipment, or the environment could be harmed by the consequences of a hazard.
- What is done to address and reduce that risk is **mitigation**.
- **Consequence** means an effect of a hazard, involving injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
- **Event** means any accident, incident, or occurrence.

This SMS plan will be reviewed periodically to continuously improve in our mitigation of safety risk. We will review and continuously improve our practices to drive continuous improvement. Effectiveness at the site level will be determined at least annually through the Safety Director audit. Reviews may occur more frequently.

This plan outlines the SMS activities for all employees and contractors employed by MV Transportation. Additional manuals and procedures should be referenced for more in-depth procedural detail. We will work with the transit agency at the site-location level to ensure these activities are also featured in their Agency Safety Plan.

1.3 Operations and Maintenance Procedures

It is the policy of MV Transportation that company operations and all personnel will comply with all applicable requirements federal and state safety regulations (Safety Policy S-10).

The system will be monitored for compliance with and sufficiency of operations and maintenance procedures. Non-compliance will be addressed through training, coaching, and management oversight, among other approaches. Non-compliance may result in disciplinary action, in

accordance with our policies and procedures. Insufficient procedures will be addressed through the Safety Risk Management process outlined in this plan. Any task that cannot be done safely should not be attempted until it can be done safely.

It is the responsibility of the operator to perform thorough Daily Vehicle Inspections (DVIs) and submit those reports to dispatch personnel. It is the responsibility of the mechanics to review and repair all defects before the vehicle goes back into service. The procedure is listed out in greater detail in our Maintenance Manual. Monthly audits of facilities including yard and surrounding areas will also be conducted to verify OSHA compliance and hazard identification, mitigation and resolution.

A vehicle with a safety defect is reported immediately by the operator. The vehicle shall be removed from service and not returned until repaired or replaced as soon as possible. In cases when the defect prevents the vehicle from being safely driven back to the garage, it is towed using a contracted service.

No operator or other authorized employee is asked, required, or permitted to drive a vehicle with a known major safety defect and is required to wear a safety vest as well as any other appropriate PPE.

As outlined in our Maintenance Manual, it is the responsibility of the maintenance manager to provide the general manager with a detailed account of the day's vehicle status and maintenance activities. The maintenance manager shall ensure the operations manager is kept up-to-date on all daily meetings and reports.

It is the policy of MV Transportation that maintenance managers are responsible to ensure all fleet vehicles are systematically inspected, maintained, and repaired. The preventative maintenance intervals shall conform to the OEM service specifications, FTA standards, and contractual requirements. (MP-03-02 – Preventative Maintenance). All seasonable maintenance services are to be conducted in accordance with OEM standards. (MP-03-10 – Seasonal Maintenance).

Please refer to the Maintenance Shop Safety Manual and Maintenance Manual for further detail outlining policies and procedures, as well as our Safety Vest Policy S-46 and Yard Safety Procedures.

Safety in Design, Acquisition and Procurement

Operational safety and passenger safety are the highest priorities when defining vehicle and facility design requirements. Design criteria are established to ensure the equipment meets or exceeds all safety, flammability and environmental requirements and meets all state and federal standards and regulations. MV Transportation's Procurement Department owns the procurement process and works closely with all impacted departments.

Conditions covered in the Contract Specifications include verification of compliance, commencing with the design phase and periodic inspections and testing during the construction phase performed by qualified consultants. A thorough inspection and system testing is performed before the equipment is conditionally accepted.

The Procurement Group works in conjunction with the maintenance, safety, and operations department when purchasing personal protective equipment for employees, controlling

chemicals and other hazards in the workplace, mandating safety requirements in specific contracts and requiring compliance from specific vendors and clients with MV Transportation's safety requirements.

1.4 Employment and Recruitment Selection

MV Transportation follows industry practices when hiring employees and contractors, including employment, criminal background, and MVR reports as required. Our hiring practices are compliant with FTA regulations on pre-employment / new hire testing and onboarding.

1.5 Drug and Alcohol Program

The Drug and Alcohol Program Manager is responsible for administering the corporate program. The location Designated Employer Representative (DER) are responsible for location program compliance. The policies and procedures conform to the drug and alcohol regulations of the United States Department of Transportation's (DOT), Federal Transit Administration (FTA) and/or the Federal Motor Carrier Safety Association (FMCSA), based on the service environment that the agency and contract operates under. The policy identifies that employees are subject to testing and includes the testing requirements, prohibited behavior, consequences of positive results and resources for employee assistance and rehabilitation.

MV Transportation is committed to a Drug and Alcohol free workplace through a Zero Tolerance policy. Participation by covered employees in MV Transportation's prohibited drug use and alcohol misuse program is a condition of employment. Supervisors must not permit a safety-sensitive employee to perform his/her job function if the employee has violated any provision of the Policy. Our Drug and Alcohol-Free policy extends to contractor personnel in safety-sensitive positions.

1.6 Workplace Violence Program

MV Transportation is firmly committed to providing a workplace free from acts of violence or threats of violence. In keeping with this commitment, the Company has established a policy strictly prohibiting any employee from threatening or committing an act of violence in the workplace, while on duty, while on company related business, or while operating any vehicle or equipment owned or leased by the Company.

Assistance is needed from all employees to achieve a workplace secure and free from violence. MV is committed to a "zero tolerance" policy and compliance with this policy in respect to workplace violence is every employee's responsibility. Any and all incidents involving an act or threat of violence must be reported immediately to the employee's supervisor or the Human Resources department. Any employee may do so without fear of retaliation of any kind. After the incident is reported to a supervisor, he/she will report the matter to the Human Resources department, who will conduct an investigation and take appropriate action.

Any employee who engages in or contributes to violent or threatening behavior may be subject to disciplinary action, up to and including termination.

1.7 Fitness for Duty

Fitness for duty is determined by Human Resources and Safety Management. It is the policy of MV Transportation that all drivers are professionals that manage fatigue and come to work well rested and prepared to provide a full measure of safe and reliable customer service (Safety Policy S-18).

All employees that take medical leave must provide a return to work release from his/her health care provider prior to returning to work. The return to work statement should be submitted to the Leaves Manager in the Benefits department.

Employees returning to work after 30 days or more break in service will be required to undergo a background check, return-to-work physical and drug test, as permitted or required by applicable federal or state law which includes but is not limited to regulations and requirements set forth by the DOT, FTA, FMCSA, OSHA and ADA.

1.8 Policies and Procedures Review

All policies and procedures require periodic reviews for applicability and accuracy. Policies and procedures include a revision date to ensure that all copies of the document are current. Specific policies and procedures are reviewed by department managers with the assistance of the Human Resources Department. Changes to policies and procedures will be made at the corporate level after a thorough review has been performed.

The contractor's safety policies and procedures will also be reviewed periodically for accuracy and compatibility with MV Transportation policies and procedures.

To submit a request for revision, individuals must complete a Change Request. Details of the request must include the policy or procedure, description of the requested process change, any known impact, and implementation efforts.

1.9 Employee Safety Reporting Program (ESRP)

Our front line employees are our best source of information for identifying hazards. Nobody knows more about the actual safety performance of the transit system than the employees who deliver the service.

The Employee Safety Reporting Program (ESRP) is intended to help the Accountable Executive and other senior managers get important safety information from across the transit agency. It can be an agency's most important source of safety data.

There are two types of safety reporting programs: mandatory and voluntary.

- Mandatory: Employees must report hazards that are compliance-based and address regulatory issues. Employees are required to immediately report every incident and accident. An employee's failure to report or provide false information of an unsafe hazard or act could result in disciplinary action.
- Voluntary: Employees are strongly encouraged to report hazards and can report anonymously. Every employee is empowered to report any unsafe hazard / risk to their supervisor or senior management without fear of retribution or penalty.

Employees will have the option to report anonymously to maintain confidentiality. The ESRP is non-punitive and employees will not be disciplined for the act of reporting the Hazard or Near Miss. However, employees must report hazards that are compliance-based and address regulatory issues. Record falsification, Drug & Alcohol violations, gross negligent behavior, and failure to report accidents/incidents and serious safety hazards are examples of employee behaviors that may result in disciplinary action.

Forms of reporting can include submitting a completed SMS Hazard/Risk Report Form (found in the Appendix) or utilizing a centrally located Safety Suggestion Box at the division location. The transit agency may also have an additional form of Employee Safety Reporting.

The Hazard/Risk Report Form shall be completed immediately, so proactive measures can be taken as soon as possible. Depending on the perceived level of risk and severity, the report shall be submitted immediately or by the end of their shift.

Input by employees into the ESRP can include safety concern reporting, operational system description, hazard identification, safety deficiencies, risk assessments, potential consequences of hazards, or recommended safety risk mitigations.

Examples of reports may include the following;

- Safety hazards in the operating environment (for example, county road conditions)
- Policies and procedures that aren't working as intended (for example, insufficient time to complete pre-trip inspections)
- Events that senior managers might not otherwise know about (for example, near misses)
- Information about why a safety event occurred (for example, radio communication challenges contributed to an incident)

The information we receive through this source will help us resolve the reported hazard and notify the supervisor or senior management of changes that may need to be made to mitigate safety hazards in the future.

The Safety Department will lead the effort on collection, analysis, resolution, and monitoring of hazards and feedback entered through the ESRP. The Safety Department will take the lead on the Safety Risk Management process, with inputs from subject-matter experts in operations and maintenance.

Information collected through our ESRP will feed into our hazard identification and analysis process. Please reference that section of the plan for further information on mitigation, resolution, and communication.

1.10 Authorities, Accountabilities & Responsibilities

Safety accountabilities and responsibilities span from corporate organizational roles to contract management and front-line employees. All employees are responsible for safe operations, as outlined in our Commitment to Safety statement.

The CEO provides strategic direction and has the responsibility for providing the leadership and resources to carry out the Safety Management System plan.

Agency Leadership and Executive Management are tasked and authorized with making sure that the organization safety policies and procedures are followed and communicated to their direct reports, general managers, managers and front-line supervisors. They will provide positive leadership and direction in maintaining the safety policy as a major priority in all operations. This group is responsible for providing resources to acquire and maintain safety and health equipment, devices and programs. They will support safety standards and behaviors ensuring that steps are made to identify and mitigate hazard and risk.

The Safety Leadership team, including the Chief Safety Officer, VP of Safety, or Director of Safety, has the authority and responsibility for making sure the safety policies and procedures are adhered by and promoted by senior management, department supervisors and managers, area safety directors and key safety team members. The Safety Leadership team will stay informed of law changes or updates concerning employee safety and record keeping and will amend safety policies as required. This group will conduct periodic reviews of safety standards to remain current with federal and state requirements. They will provide guidance in maintaining a high standard of safety training programs and assist in analyzing safety data to identify future mitigation strategies. The Directors of Safety will conduct an annual audit to ensure compliance with Federal, State and Local rules and regulations as well as company policies and procedures.

Key Staff, including Department Supervisors, Managers and all other employees, are tasked with following all company safety policies to include, but not limited to, FTA, FMCSA, USDOT, ADA safety regulations. Managers and Supervisors are responsible for staying current on all internal and external safety training. They are also responsible with reporting or responding to accidents, injuries, near misses, unsafe working conditions and potential hazards within their scope of influence. Supervisors and Managers will evaluate employee performance ensuring each employee's safe behavior and work methods and coach, retrain and discipline as required. They will conduct monthly facility audits to ensure compliance. They are also responsible for promoting the ESRP and reviewing and resolving all submissions responsibility.

In addition to the above overview of safety roles and responsibilities by group, the following highlights the site-specific roles and responsibilities. This is in addition to the responsibilities listed out in our Commitment to Safety (page 4) and SMS plan objectives (page 2).

General Manager: Ultimate responsibility for the safety performance of the location and authorizes activities to support an effective SMS.
Operations Manager: Responsible for promoting operational safety and adhering to our policies and procedures.
Safety and Training Manager: Responsible for the day-to-day implementation and operation of the SMS.

Maintenance Manager: Responsible for OSHA compliance and site-specific maintenance activities.
Trainers / Instructors: Responsible for ensuring that we are training every employee to proficiency in accordance with our performance standards.
Supervisors: Responsible for playing an active role in SMS activities, including sufficient road observations and identifying potential safety hazards with recommended solutions.
Location Safety Committee: Responsible for ensuring that reported safety items are reviewed and addressed, as well as discussing proactive measures to mitigate future risk.

1.11 Emergency Management Integration and Procedures

Every site location is to maintain an updated Emergency Action Plan (Safety Policy S-21). The purpose of the Emergency Action Plan is to assist employees and management in making quality decisions during times of crisis, and to comply with regulatory standards for Emergency Action Plans.

The Facility Emergency Action Plan will be reviewed and updated annually. Certain practice drills are to be planned and carried out for preparedness during emergency scenarios.

The Emergency Action Plan is available on our intranet site and should be printed and stored in the division.

1.12 SMS Documentation and Records

Processes that require documentation or forms to support an effective SMS are listed out in this plan within the corresponding section.

Site locations that are subject to the PTASP Final Rule will be required to maintain documentation and recordkeeping for a minimum of 3 years.

2. Safety Risk Management

The FTA defines Safety Risk Management as a process within the agency's Public Transportation Agency Plan for identifying hazards and analyzing, assessing, and mitigating the safety risk.

Through risk identification and assessment, a determination is made of the probability and severity of potential losses. Safety and loss control programs are developed to modify and eliminate or reduce the risks of these exposures.

2.1 Accident and Incident Reporting and Response

It is the policy of MV Transportation to minimize injury, damages, pain and suffering for people involved in vehicular mishaps involving MV vehicles, to promptly respond, report and to thoroughly investigate these occurrences. (Safety Policy S-32)

All incidents, including near misses and minor events, should be reported as soon as possible – whether or not the incident did or could have resulted in personnel injuries, illnesses, or property damage.

The incidents shall be immediately reported from the scene. Operator at scene shall immediately contact Dispatch and provide incident details.

When possible, it is the responsibility of the General Manager to make sure that a manager or supervisor responds to the accident to ensure care for our driver and equipment, secure the incident site, preserve evidence, review of accident investigation and proper review of company liability.

The initial accident/incident claim line information sheet should be completed with details to convey to our claims hotline.

Accident and incident response procedures will vary depending on the severity of an incident ("major" vs. "minor" definition thresholds outlined in Safety Policy S-32). All employees, supervisors and managers should be knowledgeable on response procedures outlined in Risk Management SAF-001 Accident Procedures guideline and High Priority Event notification procedures.

The General Manager and Safety Manager are responsible for ensuring a timely investigation and report is completed.

Reports are reviewed by the department manager, who determines preventability (Safety Policy S-1). Reports may also be reviewed by Risk Management and the Director of Safety. Additional actions and activities may be requested from the Risk Management department or Regional Director of Safety.

Copies of the accident/incident reports and a summary are kept for review and reporting as necessary.

Work Injuries

Work injuries include any injury, occupational disease, or disability that arises out of, or in the course of, any work-related activity and requires first aid or medical treatment. Worker's compensation OSHA-related injuries are considered work injuries for the purpose of this policy.

Injuries should be reported by the injured employee or a witness to dispatch or his/her immediate supervisor as soon as possible. If the injured employee needs medical attention, the appropriate response by coworkers (dispatch, supervisor, manager) is to:

- Assess the injury.
- Call 911 if necessary.
- Begin emergency medical treatment, if willing and able.

- Continue treatment until emergency responders arrive.
- Inform Management or Director of Safety.
- Complete a written report as soon as possible.

The injured employee must complete an Employee Injury Report for the Human Resources and Safety department as soon as possible. In compliance with OSHA regulations, all reportable employee injuries will be recorded by a representative from the Safety department and a summary will be posted from February 1 to April each year for employee review.

The Supervisor will conduct an investigation to determine the root cause of the incident surrounding the injury (Safety Policy S-30). The Supervisor will issue a written report for review by Risk Management, Regional Manager - Maintenance, General Manager and Area Safety Director. Recommendations may be issued and will follow normal channels of communication. Investigative resources will include the Employee Injury Report, eyewitness accounts, employee interviews, equipment testing, and any other reasonable means to determine root causes. Injury reports will be kept on file for future analysis.

Accident and Incident Investigation

It is the policy of MV Transportation to investigate all incidents/injuries, to identify causes, and to correct deficiencies, if any (Safety Policy S-1). Effective incident investigation is an essential step towards making improvements in the system or process that can prevent future incidents from similar causes. It is the key to correcting and improving unsafe behavior in the workplace.

Identifying all factors that came into play to cause an incident, accident, or injury, and getting down to the root cause, is the only way to ensure proper steps will be taken to prevent a recurrence. This includes examining driving and work procedures and revising them if found faulty; and identifying violations of MV, OSHA, DOT, FTA, or other procedures, rules or regulations. (Safety Policy S-32)

After corrective actions have been identified and put in place, the management team or Regional Safety Director will follow-up to ensure that corrective actions remain in place and have effectively corrected incident causes.

2.2 Safety Hazard Identification and Analysis

Hazards identifications could be submitted directly, or could be derived from trends or other data analyses.

Hazards can be identified through a variety of sources, including;

1. Reviews
2. Observations
3. Investigations
4. ESRP
5. Passenger feedback

When a hazard has been identified, it will be tracked in a Safety Risk Register log, using the FTA template provided. This includes the description of the risk, rating of the risk, the action to address it, and how we are going to monitor that action for its effectiveness.

The hazard will be rated with an "as reported" risk assessment ranking, which will be followed up for a re-evaluation after a mitigation strategy has been implemented.

Reviews

- DriveCam scored or coachable events – driver specific or aggregated trends of at-risk behaviors
- Monthly performance or quarterly reviews of both leading and lagging indicators

Observations

- Road observations and ride checks
- Mystery rider program (if applicable at the site location)
- Customer/passenger comments
- Third-party notifications

Audits and Inspections

- Monthly facility inspection
- Daily walk-through
- Pull-out procedures
- New driver assessments (Safety Policy S-37)
- Refresher training (Safety Policy S-12)
- Annual safety director audit
- Maintenance audit

Investigations

- Accident and incident investigation
- Injury root cause investigation

Hazard Analysis

Once a hazard has been identified, it must then be analyzed. Analysis may include a description of the hazard, supporting results documents, photos, and/or suggestions for resolution. Unless a hazard can be eliminated, it's safety risk must then be managed. We analyze this in terms of how likely it is to happen (probability or frequency) and how bad it could be (severity). Hazard Probability Categories and Hazard Resolution Matrix, see Attachment A, and then by determining the best method for remediation. Near Miss reporting will be collected through Dash Camera Systems, as well as encouraged through the ESRP. If not captured through a Dash Camera System, Near Miss reporting can be completed on the Hazard Risk Form and reported to the location Safety Manager or Supervisor.

2.3 Evaluation, Mitigation and Communication of Safety Risk

The last step is to develop possible mitigation strategies that address identified safety risks. In evaluating safety risks, identifying what is being done now vs. what can be done in the future is an important consideration.

The review must identify facts, establish root causes, and suggest methods for mitigating or preventing recurrence.

Statistics from accident and incidents are tracked and compared to performance measures and targets to identify where mitigations may or may not be effective.

The identified hazards are reviewed and assessed, and a priority is set based on severity of risk using the Hazard Resolution Matrix.

The Location Safety Committee plays an important part of hazard reduction and hazard resolution. The committee should provide inputs/ideas to ensure a safe work environment is established and maintained. (Safety Policy S-39).

Hazard Resolution and Communication

When the safety hazard and analysis has been completed, the location supervisor or manager who will then coordinate efforts with essential personnel to resolve the hazard in a timely manner. In cases where an immediate threat to safety exists, work will be immediately suspended by the location management while the hazard is addressed and mitigated.

Many hazards can be resolved through more than one means, but the general process for determining the best method should be by considering engineering controls, administrative work practices, or employee actions.

Communication of resolution and status of SMS activities is listed out in section 4 of this plan.

3. Safety Assurance

The FTA defines Safety Risk Management as a series of processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Assurance subcomponents includes:

1. Safety Performance and Monitoring and Measurement
2. Management of Change
3. Continuous Improvement

3.1 Safety Performance and Monitoring and Measurement

Data is constantly collected through the transit agency's Safety Assurance activities. This will include both leading and lagging indicators.

Leading indicators are used to anticipate and prevent injuries and accidents. This data source can include information collected from road observations, ride checks, mobile blitzes, or the ESRP. Our behavior-based indicators, as measured by DriveCam or another safety monitoring technology, is one of our best indicators for future success, as it measures the unsafe behaviors present in our operation.

Our lagging indicators measures what has happened, including accidents and injuries. This metric allows you to analyze historical information, as well as view in real-time if your risk mitigation plans are reducing the accidents and injuries.

Safety performance indicators will help measure inputs, outputs, outcomes, or impacts. It is a signal or early warning sign.

Safety performance targets are quantifiable and is the expected change over a period of time.

Daily monitoring will be conducted through inspections, observations, and evaluations.

Safety Performance Targets are spelled out in the PTASP addendum of this plan.

Mitigation Monitoring

The Mitigation Monitoring plan helps ensure safety performance monitoring and measurement activities are performed to confirm that mitigations are effective, appropriate, and fully implemented.

A Mitigation Monitoring plan may include the selected safety risk mitigation, the indicators or targets, description of how it will be monitored, timeframe, responsibility, and updates.

While the Mitigation Monitoring plan addresses the mitigation and monitoring activities, the Corrective Action Plan documents the corrective action and helps address short-term defects or compliance issues. The Corrective Action Plan is intended to eliminate the behavior that caused the event, while Mitigation Monitoring is to continuously monitor the hazard.

The Mitigation Monitoring process is owned by the location's management team, with assistance from the Regional Safety Director. The Mitigation Monitoring process requires periodic reviews to ensure that the risk level is being mitigated and reduction of the frequency of the hazard is taking place.

A periodic audit of contractor safety plans, Safety Data Sheets, and Personal Protective Equipment requirements will be conducted by the Safety Team and the General Manager.

3.2 Management of Change

Our operating environment has many areas that can and will be subject to a change. Prior to implementation of a proposed change, an assessment will be performed by using the Hazard/Risk

Report form to determine if the change will impact safety performance or if there are any new hazards that will be present.

If a new hazard is identified, it is put through the SRM process and evaluated. A risk mitigation strategy will be created or modified to mitigate risk for that change. Once the change is made it will be monitored for effectiveness.

The size and scope of the change can vary from something small to something as large as new service or routes. Efforts will be made to assess if there is a possible impact to safety prior to operations taking place.

3.3 Continuous Improvement

The overall safety performance of the system and the performance of SMS activities will be continuously measured and evaluated to determine the effectiveness and appropriateness of risk mitigations.

The data and information that will be collected through Safety Assurance activities will tell us how we are doing and what areas we can improve on.

Insight through these sources may trigger more frequent reviews and a revised strategy to ensure that mitigations are effective.

Local management will work with the agency to determine frequency of meetings with the contractor management to review the SMS process.

4. Safety Promotion

4.1 Competencies & Training

It is the policy of MV Transportation that all employees will undergo new hire training based upon type of service and experience level. Mastery is verified through evaluations prior to being released to revenue service.

Job-specific training programs have been developed to enhance safety skills necessary for safe, secure, and reliable customer service. This includes training for operators, trainers, supervisors, maintenance staff, operations, and management personnel.

MV Transportation maintains a continuous safety communication campaign through the form of safety meetings (Safety Policy S-27). Every month, a fleet safety and injury prevention topic will be reviewed to refresh the fundamentals and key learning points. Annual refresher training on key areas will also be conducted along with periodic promotion of prevention activities.

Maintenance monthly training will focus on OSHA compliance for shop safety. The training complies with current state and federal standards and covers potential safety and health hazards as well as safe work practices and procedures to eliminate or minimize hazards.

Information concerning safety hazards or issues is provided to employees through new hire orientation, location safety committee meeting minutes, company-wide or departmental

meetings, Safety Team briefings, monthly safety meetings, bulletin board postings, memos, or other written communications.

All MV operators will receive refresher or remedial training, as necessary, throughout their employment with the Company (Safety Policy S-12). This can include, but is not limited to, defensive driving techniques, ADA and Wheelchair Securement activities, Fatigue Management, Pedestrian and Bicyclist awareness, as well as hands-on training. This training provides a procedure for evaluation job skills and determining subsequent retraining needs or employees who are returning to work after an extended leave, employees who have been involved in an accident and refresher skill training.

Training, retraining, proficiency checks, and safety meeting attendance will be recorded and documented.

Training records are kept by the department supervisors and managers and will include:

- Date of training
- Employee names
- Copies of training materials
- Training subject
- Location of training
- Name of trainer
- Signature of trainer and trainee

A training audit and training needs assessment will be conducted at least bi-annually, or as a result of activities that come out of the SRM process.

Safety Culture

Our Vision is to deliver the *Best Customer Experience* with industry-leading Safety, Reliability, and Innovation. Our fundamental safety belief is that Safety is a core business value and there is nothing more important than promoting and maintaining a safe operation.

Our Safety Culture Guide outlines the importance of implementing initiatives at the local level to promote a positive safety culture.

To foster a positive safety culture, supervisors and management should make every effort to demonstrate their commitment to safety, offering the highest level of respect and dignity and a genuine concern for the welfare of their workers. Supervisors and management will exhibit the behaviors they want to see as part of their location's safety culture.

Elements of our Safety Culture Guide include:

- Employee engagement and buy-in
- Accountability and ownership of employees
- Positive recognition
- Reinforcement of safe behaviors
- Safety award programs
- Administration of the Katherine McClary Safe Operator Award program
- Safety campaigns and blitzes
- Incentive and reward contests

Supervisors and managers will pay attention to, measure, and publicly acknowledge the desired behaviors and performance outcomes by workers. The purpose of this and other safety-related programs is to focus our employees on working safely, and then reward them for their success.

4.2 Safety Communication

Communication of the SMS

A variety of methods may be used to communicate the SMS plan, including updates or memos. Communication can include updates related to SMS concerns/issues, lessons learned, analysis, new requirements or tracking mechanisms, and/or roles and responsibilities.

It is the responsibility of the location management to train employees on how to identify and report hazards. Management and supervisors will encourage employees to report their safety concerns or hazards.

Safety actions that are taken in response to reports submitted through the ESRP will be communicated to employees during the safety meetings or posted in a common area.

Our Policy and Commitment to Safety statement will be distributed to all managers to be reviewed with all employees during initial onboarding. This will be reviewed at least annually to continuously promote a safe work environment and communicate our commitment to an incident and injury free workplace.

Our policies, procedures, written statements, and formalized plans that support our SMS activities are available to all managers through our intranet site.

Continuous Awareness and Safety Communication

Management and supervisors will facilitate in daily safety communication and planning engagement blitzes and campaigns accordingly.

Dispatchers will play an active role in this process by delivering safety radio announcements.

The Daily Safety Message will be printed and posted throughout the facility.

Material that supports the monthly fleet safety topic and/or injury prevention topic that is distributed from corporate will be displayed throughout the facility.

Additional means of communication includes:

• New Hire Orientation Training • Operational Safety Calls • Safety Meetings • One-on-one dialogue between supervisors and employees • Safety Briefings/Toolbox Talks	• Safety Bulletin Board • Safety Committees • Posters, Flyers, & Memos • E-mail Communications • Internal Websites • Video/TV Displays

5. Supporting Resources

Maintenance, Facility & Fleet	Operator Safety	General Procedures & Regulatory Compliance
Maintenance Shop Safety Handbook	Employee Handbook	Code of Federal Regulations (CFR)
Vehicle Maintenance Plan (PM)	Safety Manual	Crime Prevention Environmental Design (CPTED)
Aerial Platform Certification	New Hire Orientation	Emergency Action Plan
Powered Industrial Truck (Forklift) Certification	Fitness for Duty Evaluation	Fire Prevention Plan
Clean Air Act (608,609)	Operations Policies and Procedures Handbook	HAZCOM Plan
Noise Protection	Recruiting and Hiring Practices	Hearing Conservation Program
Lock Out/Tag Out	Incident Management and Investigation	Heat Illness Prevention
Personal Protective Equipment	Safety Audits/Inspections	Lockout Tagout Program
Respiratory Protection	Safety Reports and Forms	Safety and Security Program
Welding, Cutting and Brazing Safety	Safety Communication TV Displays	System Safety Program Plan
OSHA 10-Hour	Wheelchair Certifications	System security and Emergency Preparedness Plan
OSHA 30- Hour	Defensive Driving Program	KMA Safe Driver Award Program
Heat Stress	Operator Refresher Training	Monthly Safety Meetings
Housekeeping	Safety Committees	Customer Service Training
HAZCOM	Safety Calendar – Weekly & Monthly Topics	Continuity of Operations Plan
Bloodborne Pathogens	Bi-monthly Safety Stand-down	

6. Plan Development

6.1 Approval and Updates

Name of Entity That Drafted This Plan	MV Transportation	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	Relevant Documentation (title and location)	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification
	Relevant Documentation (title and location)	

6.2 Version Updates

Version Number and Updates *Record the complete history of successive versions of this plan.*			
Version Number	**Section/Pages Affected**	**Reason for Change**	**Date Issued**
1		Creation	10/2019

6.3 Annual Audit and Review of Plan

Annual Audit & Review and Update of the Safety Management Systems Plan *Describe the process and timeline for conducting an annual review and update of the Safety Management Systems Plan.*
During the final quarter the Safety Plan Committee will meet and review current SMS plan and make changes accordingly and update this SMS document. A communication will be sent out with an explanation of changes and a pdf copy of the updated plan will be made available vie e-mail or web.

PTASP Addendum

Transit Agency Information

Transit Agency Name				
Transit Agency Address				
Name and Title of Accountable Executive				
Name of Chief Safety Officer or SMS Executive				
Mode(s) of Service Covered by This Plan		List All FTA Funding Types (e.g., 5307, 5310, 5311)		
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)				
Does the agency provide transit services on behalf of another transit agency or entity?	Yes ☐	No ☐	Description of Arrangement(s)	
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided				

Safety Performance

Safety Performance Targets

Safety Performance Targets

Specify performance targets and definitions based on the safety performance measures established under the National Public Transportation Safety Plan. The table below provides targets for fatality rate (reportable fatalities per revenue mile); injury rate (reportable injuries per revenue mile); safety event rate (reportable safety event per revenue mile); and system reliability (revenue miles between major mechanical failures).

Mode of Transit Service	Preventable Accidents per 100K miles	Employee Injuries (Rate)	Fatalities (Rate)	Safety Events (Rate)	System Reliability (Rate)	

Safety Performance Target Coordination

Safety Performance Target Coordination		
MV Transportation will work with the agency to support them in their PTASP which includes analyzing historical trends to establish safety performance targets. Agency will coordinate directly with MPO and MV will help in this process as needed.		
Targets transmitted to stakeholders	Name	Date Targets Transmitted

Attachment A

1 HAZARD PROBABILITY TABLE

Probability Level	Description
A – Frequent	Likely to occur frequently. Continually experienced in the fleet/inventory.
B – Probable	Likely to occur several times in life of an item. Likely to occur frequently in the fleet/inventory.
C – Occasional	Likely to occur sometime in life of an item. Likely to occur several times in the fleet/inventory.
D – Remote	Unlikely, but possible to occur in the life of an item. Reasonably expected in the fleet/inventory.
E – Improbable	So unlikely, occurrence is not expected. Unlikely to occur, but possible in the fleet/inventory.

2 RISK ASSESSMENT FREQUENCY/SEVERITY MATRIX

	Severity			
Frequency	1 Catastrophic	2 Critical	3 Marginal	4 Negligible
A – Frequent	1/A	2/A	3/A	4/A
B – Probable	1/B	2/B	3/B	4/B
C – Occasional	1/C	2/C	3/C	4/C
D – Remote	1/D	2/D	3/D	4/D
E – Improbable	1/E	2/E	3/E	4/E

3 HAZARD RESOLUTION TABLE

Severity / Frequency	Resolution
1/A | 1/B | 1/C | 2/A | 2/B | 3/A |	Unacceptable—correction required.
1/D | 2/C | 2/D | 3/B | 3/C |	Unacceptable—correction may be required after review by CEO.
1/E | 2/E | 3/D | 3/E | 4/A | 4/B |	Acceptable—with review by CEO.
4/C | 4/D | 4/E |	Acceptable—without review.

Attachment B

MV Transportation SMS Hazard/Risk Report Form		
This report concerns:	☐ Hazard ☐ Risk ☐ Near Miss ☐ Other	
Hazard Type:	☐ Policy/Procedure ☐ Operational ☐ Environmental ☐ Equipment/Design ☐ Training	
REPORTED BY:	☐ Employee ☐ Customer/Passenger ☐ Other:	ie: PD or FD
NAME:	LOCATION:	
Description of Safety Concern:		
PHOTOS:	☐ Yes ☐ No	
Hazard Analysis: According to Hazard Severity Matrix	☐ 1 Catastrophic ☐ 2 Critical ☐ 3 Marginal ☐ 4 Negligible	
Recommended Safety Risk Mitigation:		
Supervisor/Safety Manager Comments/Actions:		
Supervisor/Safety Manager:		

Hazard/Risk Resolution			
Is Hazard/Risk corrected "On the Spot"?	☐ Yes ☐ No	If the answer is "No" then proceed with the steps below:	
This report must be forwarded to the SAFETY DEPARTMENT; report is assigned to specific department(s) for hazard rectification; report is assigned a priority			
Priority:	☐ High ☐ Medium ☐ Low		
Hazard/Risk/ Near Miss deficiency corrected?	☐ Yes ☐ No	Date closed if "Yes"	Date
If answer is NO, notify Safety department to begin continuing action for resolution, and send to the Safety Team or Staff for recommendations.			
List how the Hazard/Risk/Near Miss was resolved			
Date Resolved	Date		

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