

RESOLUTION R2024-30

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MANTECA, STATE OF CALIFORNIA, APPROVING AND IMPLEMENTING THE PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

WHEREAS, on July 19, 2018, the Federal Transit Administration (FTA) published the Public Transportation Agency Safety Plan (PTASP) Final Rule; and

WHEREAS, on November 17, 2020, the City Council approved its original Agency Safety Plan (ASP) as required by the Federal Transit Administration (FTA); and

WHEREAS, FTA published a Dear Colleague letter in 2022 which outlined regulatory changes resulting from passage of the Bipartisan Infrastructure Law necessitated an update to the PTASP; and

WHEREAS, a transit agency serving a small urbanized area must develop its ASP in cooperation with frontline employee representatives, and address strategies for minimizing exposure to infectious diseases with the Centers for Disease Control and Prevention or state health authority guidelines; and

WHEREAS, Manteca Transit and contracted transit operator MTM Transit established a Safety Committee to review performance metrics and assist in the developing of the ASP; and

WHEREAS, the City Council has considered all information related to this matter, as presented at the public meetings of the City Council identified herein, including any supporting reports by City Staff, and any information provided during public meetings.

NOW, THEREFORE, BE IT RESOLVED, by the City Council of the City of Manteca, as follows:

1. The City Council hereby finds that the facts set forth in the recitals to this Resolution are true and correct, and establish the factual basis for the City Council's adoption of this Resolution.
2. The City Council hereby approves and adopts the City of Manteca Public Transportation Agency Safety Plan.
3. This Resolution shall take effect immediately upon adoption.

I HEREBY CERTIFY that the foregoing Resolution was duly adopted by the City Council of the City of Manteca at a public meeting of said City Council held on the 20th day of February, 2024, by the following vote:

AYES: Breitenbucher, Halford, Morowit, Nuño, Singh

NOES: None

ABSENT: None

ABSTAIN: None

MAYOR: 
GARY SINGH
Mayor

ATTEST: 
CASSANDRA CANDINI-TILTON
City Clerk



Public Transportation Agency Safety Plan

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City of Manteca- Manteca Transit
220 Moffat Blvd
Manteca, CA 95336
Agency Safety Plan
Adopted November 17, 2020
Updated February 20, 2024

Signature of Accountable Executive

02/28/2024

Date

I. TRANSIT AGENCY INFORMATION

City of Manteca – Manteca Transit

220 Moffat Blvd. Manteca CA 95336

Accountable Executive, Public Works Transit Manager- Juan Portillo

Chief Safety Officer, MTM Transit LLC Safety Manager.

City of Manteca - Manteca Transit is a Tier II Transit Agency that operates solely within the city of Manteca, San Joaquin County, California. The City offers four local fixed routes Monday through Saturday, a shuttle connecting the Altamont Corridor Express (ACE) Station with the Manteca Transit Center on weekdays, and dial-A-ride and Americans with Disabilities Act (ADA) Paratransit services. The Manteca City Council is the governing body for the City of Manteca- Manteca Transit. The council meets formally on the first and third Tuesday of each month at 6:00p.m. at the City’s Council Chambers, located at 1001 W. Center Street in Manteca. City of Manteca does purchase transportation services from MTM Transit. City of Manteca is a recipient of Section 5307 and Section 5339 funds. City of Manteca does not provide transportation services on behalf of another entity.

II. PLAN DEVELOPMENT, APPROVAL, AND UPDATES

This Public Transit Agency Safety Plan (PTASP) was developed in accordance with 49 Code of Federal Regulations Part 673, which mandates safety and security procedures for public transit agencies in the United States that receive federal funding. The plan must include the agency’s strategies for minimizing the exposure of the public, personnel, and property to unsafe conditions and include safety performance targets. The agency Management, including Chief Safety Officer and staff will review this PTASP during the month of October each year. The Transit team will provide updates and input for edits as required then redraft and submit for approval to appropriate authority as directed. City of Manteca collects data through its Safety Risk Management and Safety Assurance processes, shared with California Department of Transportation (Caltrans) and San Joaquin Council of Governments (SJCOG). SJCOG and Caltrans will evaluate City of Manteca’s Safety Performance Targets (SPTs) to determine whether they need to be changed, as well.

Name of Entity That Drafted This Plan	City of Manteca, Transit Division	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
		02/28/2024
Approval by the Board of Directors	City of Manteca City Council	Date of Approval
	City Council	02/20/2024

or an Equivalent Authority	Relevant Documentation (title and location)	
	Resolution # 2024-30	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification
	Relevant Documentation (title and location)	

Version Number and Updates			
<i>The history of successive versions of this plan are listed below.</i>			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
01	ALL	First Edition	2020
02	ALL	Bipartisan Infrastructure Law	2024

Safety Management System (SMS)

SMS is a management system, akin to a financial or quality management system. It ensures that a public transportation agency, regardless of its size or service environment, has the necessary organizational structures, activities and tools in place, and the necessary safety accountabilities to direct and control resources to manage safety proactively and optimally.

SMS activities proactively detect safety concerns and organizational factors, and correct them using data-driven prioritization. As such, important to its success are the:

1. Effective collection, analysis, and sharing of safety data, and
2. Active, accurate, and routine safety performance measurement.

SMS provides transit and oversight agencies with additional tools and activities, and therefore new opportunities to efficiently and effectively align safety priorities and promote continuous improvement in safety performance.

SAFETY MANAGEMENT SYSTEM COMPONENTS

<p>Safety Management Policy</p> <ol style="list-style-type: none"> 1. Safety Management Policy Statement 2. Safety Accountabilities and Responsibilities 3. Integration with Public Safety and Emergency Management 4. SMS Documentation and Records 	<p>Safety Assurance</p> <ol style="list-style-type: none"> 8. Safety Performance Monitoring and Measurement 9. Management of Change 10. Continuous Improvement
<p>Safety Risk Management</p> <ol style="list-style-type: none"> 5. Safety Hazard Identification 6. Safety Risk Assessment 7. Safety Risk Mitigation 	<p>Safety Promotion</p> <ol style="list-style-type: none"> 11. Safety Communication 12. Competencies and Training

III. SAFETY PERFORMANCE TARGETS

Safety performance targets are based on the safety performance measures established under the National Public Transportation Safety Plan.

SAFETY PERFORMANCE MEASURE: FATALITIES (total number of reportable fatalities and rate per total vehicle revenue miles by mode)

Reducing the number of fatalities is a top priority for the entire Department of Transportation. As an industry, we must try to understand the factors involved in each fatality in order to prevent further occurrences. Measuring the number of fatalities over vehicle revenue miles, by mode, provides a fatality rate from which to assess future performance.

SAFETY PERFORMANCE MEASURE: INJURIES (total number of reportable injuries and rate per total vehicle revenue miles by mode)

Many transit agencies have never had a fatality, and continued safe operation is exactly what is desired. However, injuries occur much more frequently, and are due to a wide variety of circumstances. Analyzing the factors that relate to injuries is a significant step in developing actions to prevent them. Again, measuring the number of injuries by mode, over vehicle revenue miles provides an injury rate from which to assess future performance.

SAFETY PERFORMANCE MEASURE: SAFETY EVENTS (total number of reportable events and rate per total vehicle revenue miles by mode)

The safety events measure captures all reported safety events that occur during transit operations and the performance of regular supervisory or maintenance activities. A reduction in safety events will support efforts to reduce fatalities and injuries, as well as damages to transit assets. Measuring the number of safety events by mode over vehicle revenue miles provides a safety event rate from which future performance can be compared.

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

The system reliability measure expresses the relationship between safety and asset condition. The rate of vehicle failures in service, defined as mean distance between major mechanical failures, is measured as revenue miles operated divided by the number of major mechanical failures. This is a measure of how well a fleet of transit vehicles is maintained and operated. FTA recognizes the diversity of the transit industry, and that agencies have varied equipment types, with varied rates of performance, so this measure allows agencies to develop safety performance targets that are specific to their own fleet type, age, operating characteristics, and mode of operation.

As part of this Safety Plan, the City of Manteca – Manteca Transit has developed Safety Performance Targets (SPTs) that it will review and update annually. The specific safety performance targets are based on the safety performance measures established under the National Public Transportation Safety Plan. FTA has adopted four initial safety performance measures: (1) Fatalities, (2) Injuries, (3) Safety events, and (4) System Reliability. The safety performance targets set by City of Manteca – Manteca Transit are based on the past two (2) calendar years of data. These targets for the year 2024 are expected to stay within +/- 1% of the previous two years’ data pertaining to fatalities, injuries, safety events, and system reliability. Table 1 below displays the mode of transit service, the annual goal for Fatalities, Injuries and Safety Events including the target rates for Fatalities, Injuries and Safety Events. In addition, System Reliability targets are measured by number of mechanical failures per 100,000 miles.

Table 1

Mode of Transit Service	Fatalities (Total # of Reportable Fatalities)	Injuries (Total # of Reportable Injuries)	Safety Events (Total # of Reportable Events)	System Reliability	Fatality Rate (Rate per 100K VRM)	Injury Rate (Rate per 100K VRM)	Safety Event Rate (Rate per 100K VRM)
Motor Bus (MB)	0	1	1	88,995	0	0	0.6
Demand Response/ Paratransit (DR)	0	1	1	16,210	0	3.1	3.1

To calculate SPTs, the City of Manteca referred to system safety data, including:

- Near miss information
- Accident investigation reports (with casual factor analysis)
- Internal safety audits (or reviews)
- Injury reports
- Safety event reports (including accidents, incidents, and occurrences)
- System monitoring (including monthly reports, and testing and inspection records)

Safety Performance Target Coordination

The coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets are listed below.

City of Manteca- Manteca Transit Staff will contact Caltrans and SJCOG to advise of intended Safety Performance Targets in Manteca Transit PTASP.		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Cal Trans	
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	San Joaquin Council Of Governments	

IV. SAFETY MANAGEMENT POLICY

Safety Management Policy Statement

The management of safety is one of our core business functions. **Manteca Transit** is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all our transit service delivery activities take place under a balanced allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting established standards.

All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the City of Manteca, City Manager.

Manteca Transit' 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 our 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, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities to a point which is consistent with our 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
- **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** our safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- **Continually improve** our 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 our operations are delivered meeting our safety performance standards.

	02/28/2024
Juan Portillo, Transit Manager	Date
	02/28/2024
General Manager/Safety Manager	Date

Safety Management Policy Communication

All matters concerning occupational safety, health or security will be communicated to employees by written documentation, staff meetings, formal and informal training and posting in work areas.

Employee Safety Reporting Program

Herein is the process and protections for employees to report safety conditions to senior management, including employee behaviors that may result in disciplinary action and therefore, are excluded from protection.

Communication from employees to supervisors and/or the safety representatives about unsafe, unhealthy or insecure conditions is encouraged and may be verbal or written, as the employee chooses. The employee may use the “Report of Unsafe Condition or Hazard” form and remain anonymous.

Although the employer and management have the primary responsibility in providing employees with a safe and healthy workplace, employees are ultimately responsible for their own safety.

If any employee fails to follow the City of Manteca’s and MTM Transit’s safety procedures, the employee’s supervisor should:

- I. Inform the employee of the violation.
- II. Inform or remind the employee of the correct procedure.
- III. Ask the employee to comply and correct the violation(s).
- IV. Remind the employee of the City of Manteca’s and MTM Transit disciplinary policy.

No employee will be retaliated against for reporting hazards or potential hazards or for making suggestions related to safety or security. In addition, employees submitting frivolous or false reports of hazards or potential hazards will be subject to progressive discipline up to and including termination.

Authorities, Accountabilities, and Responsibilities

The authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency's Safety Management System (SMS) are identified by title.

Accountable Executive: Ultimate authority over SMS development and implementation, accountable for agency safety performance, responsible for agency to carry out the Agency Safety Plan, and promotes safety.

- a. Authority: The AE has ultimate control and direction over PTASP and TAM Plans
- b. Accountability: The AE must ensure that agency SMS is effectively implemented throughout the agency's public transportation system. To ensure that action is taken as necessary to address substandard performance in the agency's SMS. The AE may delegate specific responsibilities but is ultimately accountable.
- c. Responsibility: The AE is responsible to carry out the PTASP of the agency as well as the TAM Plan including control and direction over human and capital resources needed to develop and maintain the PTASP and the TAM Plan.

Chief Safety Officer: Reports SMS activities to AE and agency governing body when required, implements and operationalizes agency SMS, manages SMS documentation, oversee processes are in place, monitors Safety Risk mitigations, and develops performance Reports

- a. Authority: The CSO have authority over the day-to-day implementation and operation of the agency's SMS. The CSO are partners with the agency leaders and staff to execute the agency SMS.
- b. Accountability: The CSO are accountable to report to the AE and communicate AE decisions and directives as well as briefing the AE and Council Members.
- c. Responsibility: The CSO are responsible to implement and operate the agency SMS processes and activities including:
 1. Develop and maintain SMS documentation
 2. Directing hazard identification and risk assessment
 3. Monitor safety risk mitigation activities
 4. Planning safety management training
 5. Ensure that Safety Suggestion forms are reviewed and addressed promptly

Agency Leadership and Executive Management:

Manteca Transit Leadership and Executive Management is comprised of Public Works Director, Transit Manager, General Manager, Safety Manager, and Maintenance Manager. The Executive team provides input, guidance and support to develop the Agency Safety Plan and implement SMS processes, review and act on safety performance reports to mitigate risks in areas of responsibility

- a. Authority: To direct subordinate staff and ensure SMS compliance
- b. Accountability: To ensure that SMS activities are being carried out and followed in each of their respective areas of operation
- c. Responsibility: To support the day to day operation and implementation of the agency SMS

Key Staff: Manteca Transit Key staff is comprised of City Staff, Administrative Analyst along with Front line Employees that consist of: Road Supervisor, Dispatch, Drivers and Safety committee. Draft safety management system policy and procedures, are subject matter experts in development of real-world SMS strategies and processes, Execute SMS activities and promote best practices:

- a. Authority: The key staff have the authority as assigned by the leadership and management to assist in the development of agency SMS processes and activities as they are the subject matter experts.
- b. Accountability: The key staff assigned are accountable to endorse the agency SMS and promote it at all levels.
- c. Responsibility: Key staff members are responsible to draft the agency SMS policies and procedures. In addition to develop, implement and operate the agency safety plan action elements.

The City of Manteca identifies mitigations & strategies to minimize exposure to infectious diseases, consistent with Centers for Disease Control and Prevention or State health authority guidelines to exposure of infectious diseases through the Safety Risk Management process (Section 7 of this document). These mitigations & strategies include:

- Clear driver protection barriers on all buses and at the lobby counter to separate staff and customers;
- Sanitation stations (e.g. hand sanitizer dispensers) at the following entrances: (1) Driver Breakroom, (2) All Lobby entrances at the Transit Center.
- Mask recommendation for all passengers and staff;
- Available personal protection equipment (PPE) for all staff;
- Enhanced bus cleaning protocols;
- Implementation of any other emerging best-practice, as recommended by health authorities.”

V. SAFETY RISK MANAGEMENT

Safety Risk Identification

The Agency will apply risks of loss to the Risk Management Process which includes a systematic and continuous identification of loss exposures, the analysis of these exposures in terms of frequency and severity probabilities, the application of sound risk control procedures and the financing of risk consistent with the Agency’s financial resources. The Safety Risk Management practices include a comprehensive hazard identification and analysis data collection process from various sources such as: the employee safety reporting program, observations of operations, inspections, internal safety investigations, accident reports, compliance programs, safety committee reviews, industry data, governmental sources (FTA, NTSB, CHP), customer and public feedback or complaints.

Safety Risk Assessment

Safety risk assessment defines the level or degree of the safety risk by assessing the likelihood and severity of the consequences of hazards and prioritizes hazards based on the safety risk. The Chief Safety Officer, with assistance from key staff subject matter experts, is responsible for assessing identified hazards and ratings using the safety risk matrix below. Prioritizing safety risk provides the Accountable Executive with the information needed to make decisions about resource application.

The following matrix, adopted from the TSI Participation Guide – SMS Principles for Transit, facilitates the ranking of hazards based on their probability of occurrence and severity of their outcome.

Probability Levels			
Description	Level	Specific Individual Item	Fleet Inventory
Frequent	A	Likely to occur often in the life of an item.	Continuously experienced.
Probable	B	Will occur several times in the life of an item.	Will occur frequently.
Occasional	C	Likely to occur sometime in the life of an item.	Will occur several times.
Remote	D	Unlikely, but possible to occur in the life of an item.	Unlikely, but can reasonably be expected to occur.
Improbable	E	So unlikely, it can be assumed occurrence man not be experienced in the life of an item.	Unlikely to occur, but possible.
Eliminated	F	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.	Incapable of occurrence. This level is used when potential hazards are identified and later eliminated.

The measuring goes from A to F with A being frequent or likely to occur frequently and E being improbable or expected that this event will most likely never occur. The designation F is used when potential hazards are identified and later eliminated.

The Safety Risk Severity Table presents a typical safety risk. It includes four categories to denote the level of severity of the occurrence of a consequence, the meaning of each category, and the assignment of a value to each category using numbers. In this table, 1 is considered catastrophic meaning possible deaths and equipment destroyed and 4 is considered negligible or of little consequence with two levels in between.

Severity Levels		
Description	Level	Mishap Result Criteria
Catastrophic	1	Could Result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10M

Critical	2	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 personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M
Marginal	3	Could result in one or more of the following: injuries or occupational illness resulting in one or more lost work day(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100k but less than \$1M
Negligible	4	Could result in one or more of the following: injuries or occupational illness not resulting in lost work day, minimum environmental impact. Or monetary loss less than \$100k.

Safety Risk Probability and Safety Risk Severity are combined into the Safety Risk Index Ranking to help prioritize safety risks according to the table below.

Safety Risk Assessment Matrix				
Severity → Probability ↓	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
A-Frequent	1A	2A	3A	4A
B- Probable	1B	2B	3B	4B
C-Occasional	1C	2C	3C	4C
D- Remote	1D	2D	3D	4D
E- Improbable	1E	2E	3E	4E
F- Eliminated				
Safety Risk Index Ranking				
1A, 1B, 1C, 2A, 2B	High	Unacceptable		
1D, 2C, 3A, 3B	Serious	Undesirable - With management decision required		
1E, 2D, 2E, 3C, 3D, 3E, 4A, 4B,	Medium	Acceptable - with review by management		
4C, 4D, 4E	Low	Acceptable - without review		

The Chief Safety Officer documents recommendations regarding hazard rating and mitigation options and reports this information to the Accountable Executive.

Safety Risk Mitigation

The Chief Safety Officer, assisted by Key Staff subject matter experts, reviews current safety risk mitigations and establish procedures to 1) eliminate; 2) mitigate; 3) accept specific risks. Prioritization of safety remediation measures is based on risk analysis and a course of action acceptable to Manteca Transit management.

The safety risk must be mitigated if ranked as Unacceptable (High- Red). Those safety risks that have been mitigated, even those mitigated risks shown as Acceptable status (Low -Green) undergo regular and consistent monitoring to ensure the mitigation strategy is effective.

Key strategies to minimize the types of risks that potentially exist include:

- Development and deployment of policies and procedures that address known hazards and risks,
- Discussion of other actions, strategies and procedures that might help safeguard against unknown/unforeseen risks,
- Training of drivers and other agency staff on all safety policies and procedures,
- Training of drivers and other agency staff on methodologies for handling emergencies, and
- Training of drivers and staff on proper and effective use of emergency equipment and communication technologies and protocol.

Safety risk mitigations are tracked and updated in the Hazard Log by the Chief Safety Officer.

The City of Manteca identifies mitigations & strategies to minimize exposure to infectious diseases, consistent with Centers for Disease Control and Prevention or State health authority guidelines to exposure of infectious diseases through the Safety Risk Management process (Section 7 of this document). These mitigations & strategies include:

- Clear driver protection barriers on all buses and at the lobby counter to separate staff and customers;
- Sanitation stations (e.g. hand sanitizer dispensers) at the following entrances: (1) Driver Breakroom, (2) All Lobby entrances at the Transit Center.
- Mask recommendation for all passengers and staff;
- Available personal protection equipment (PPE) for all staff;
- Enhanced bus cleaning protocols;
- Implementation of any other emerging best-practice, as recommended by health authorities.”

VI. SAFETY ASSURANCE

Safety Performance Monitoring and Measurement

Periodic review of safety processes, policies and systems are conducted as an ongoing activity. As accident and injury investigations, facility inspections or risk assessments identify new risks, the safety management system will be amended and incorporated into the overarching Agency Safety Plan. Training will be provided to all transit employees to be aligned with the changes. Formal reviews will be completed by the operations management team to ensure that updates are accurate and accounted for, and that standards are in alignment with agency policy.

Continual monitoring of safety performance metrics and analysis of safety performance data by Agency staff will ensure that any trends or lack of progress for change are identified and addressed and do not go uncovered. Senior Management needs safety performance data to evaluate whether implemented safety

risk mitigations are appropriate and effective. In addition, to evaluate how well the agency's safety performance matches established safety objectives and safety performance targets.

The following is Manteca Transit's methods and processes to identify hazards. The Agency considers, as a source for hazard identification, data and information provided by an oversight authority and FTA. Hazards are identified through a variety of sources, including:

- Employee safety reporting,
- Safety audits
- Daily review of DriveCam incidents to monitor and coach driver behaviors,
- Daily review of DOMO dashboard to monitor Safety Key Performance Indicators; including speeding events, pre-trip/ post trip inspections, and driver safety scorecard,
- Monthly Facility Safety inspections,
- Monthly ride checks to evaluate driver performance - MTM Driving Evaluation Form,
- Monthly Secret Rider program to evaluate driver performance and vehicle conditions,
- Regular review of onboard IDrive for specific incidents
- Safety review prior to implementing any service change or any known detour,
- Annual vehicle inspections and preventative maintenance inspections as per manufacturer recommendation.
- Observations from supervisors,
- Comments from customers, passengers, and third parties,
- Maintenance reports
- Review of monthly performance data and safety performance targets,
- Safety committee, driver and all-staff meetings

In the event of a fatality, Manteca Transit complies with all FTA drug and alcohol requirements.

In California, every driver involved in an accident that results in death, injury, or property damage over \$1000, effective January 1, 2017, must report the accident on a [Report of Traffic Accident Occurring in California](#) (SR 1) form to DMV. The report forms are available at www.dmv.ca.gov, by calling 1-800-777-0133, and at CHP and DMV offices. Also, under California Vehicle Code §16002(b) the driver of a vehicle that is owned or operated by a publicly owned or operated transit system, or that is operated under contract with a publicly owned or operated transit system, and that is used to provide regularly scheduled transportation to the general public or for other official business of the system shall, within 10 days of the occurrence of the accident, report to the transit system any accident of a type otherwise required to be reported pursuant to [subdivision \(a\) of Section 16000](#) . MTM Transit requires driver notification to the City of Manteca immediately and maintains records of any report filed pursuant to this paragraph.

VII. DEFINITIONS AND ACRONYMS

Safety Communication

City of Manteca and MTM Transit communicates safety and safety performance information throughout the organization that, at a minimum, conveys information on hazards and safety risks relevant

to employees' roles and responsibilities and informs employees of safety actions taken in response to reports submitted through an employee safety reporting program.

Ongoing safety communication is critical and MTM Transit ensures communication occurs up, down, and across all levels of the organization. Any lessons learned are communicated to all concerned. Management commitment to address safety concerns and hazards is communicated on a regular basis. Management encourages and motivates employees to communicate openly, authentically, and without concern for reprisal; ensures employees are aware of SMS principles and understand their safety-related roles and responsibilities; conveys safety critical information such as accident data, injuries, and reported safety concerns and hazards and their resolutions to employees. MTM Transit's tools to support safety communication include:

- Safety bulletins
- Safety notices
- Posters
- Newsletters
- Seminars and workshops
- New employee training and refresher training through TAPTCO
- Intranet or social media
- Monthly Safety Training Meetings
- Safety Committee Meetings (quarterly, or as needed)
- Direct contact, verbally and in meetings

Competencies and Training

Agency employees and contractors directly responsible for safety achieve their competencies and training through any one or all of the following methodologies:

- New Hire Orientation as required through TAPTCO
- Monthly Safety Meetings with all employees to discuss Safety Key Performance indicators and safety related topics; including speeding, distractions, driving techniques and others.
- Formal classroom training
- Target Solution Trainings

Manteca Transit is committed to developing, implementing, and consistently improving strategies and processes to ensure that transit achieves the highest practicable level of safety. Manteca Transit has adopted the principles and methods of SMS as the basis for enhancing the safety of public transportation. Manteca Transit will follow the principles and methods of SMS in development of future versions of its Public Transit Agency Safety Plan. More detailed information and examples of current practices are included in the attachments in the last section of this document.

VIII. DEFINITIONS AND ACRONYMS

Accident: 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; an evacuation for life safety reasons.

Accountable Executive: A single, identifiable person who has ultimate responsibility for carrying out Manteca Transit's Safety Plan; 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 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 or Transit Agency: City of Manteca - Manteca Transit

Caltrans: The California Department of Transportation

Chief Safety Officer: An individual who has responsibility for carrying out Manteca Transit Safety Plan and reports directly to the Transit Agency's Accountable Executive.

CRF: Code of Federal Regulations.

Event: Any Accident, Incident, or Occurrence.

FTA: The Federal Transit Administration, an operating administration within the United States Department of Transportation.

Hazard: Any real or potential condition that can cause injury, illness, or death, damage to or loss of the facilities, equipment, rolling stock, or infrastructure of the system, or damage to the environment.

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

Investigation: 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: The plan to improve the safety of all public transportation systems that receive federal financial assistance under 49 U.S.C. Chapter 53.

Occurrence: An Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of the Transit Agency.

Part 673: 49 CFR (Code of Federal Regulations) Part 673.

Performance Measure: 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: A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).

Risk: The composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation: A method or methods to eliminate or reduce the effects of hazards.

Safety Assurance: Processes within the Transit Agency's Safety Management Systems that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the Transit Agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Management Policy: The 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 Systems (SMS): 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 Performance Target (SPT): A Performance Target related to safety management activities.

Safety Promotion: 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 (SRA): The formal activity whereby the Transit Agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management (SRM): A process within the Transit Agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious injury: Any injury which: (1) requires hospitalization for more than 48 hours, commencing within seven days from the date 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 five percent of the body surface.

State of Good Repair (SGR): The condition in which a capital asset is able to operate at a full level of performance.

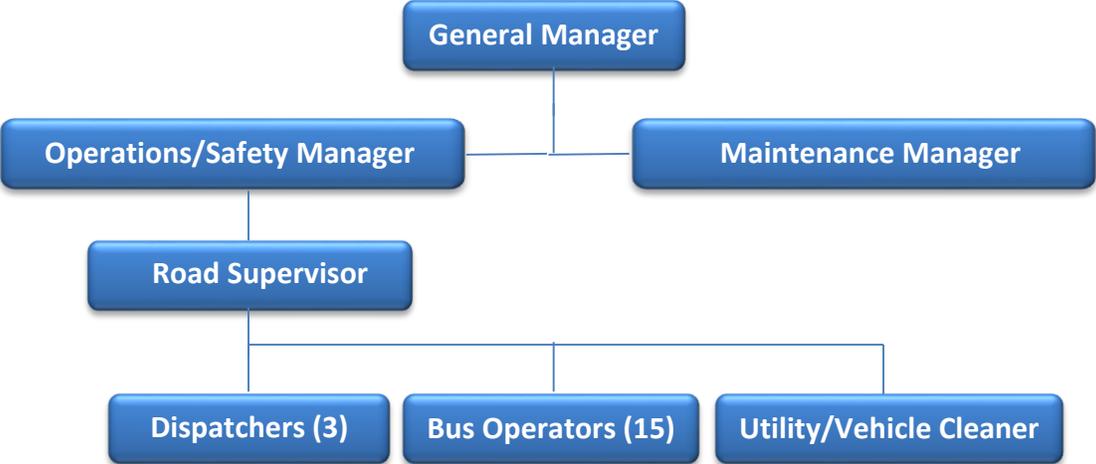
Transit Asset Management Plan: The strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable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

U.S.C.: United States Code.

XI. ATTACHMENTS

- a. MTM Organizational Chart
 - i. MTM Transit Safety Management System and Agency Safety Plan
 - ii. MTM Transit System Safety Program Plan
 - iii. MTM Drug and Alcohol Policy
 - iv. MTM Emergency Action Plan
 - v. Heat Illness and Stress Prevention Plan
 - vi. MTM Information Security Program Handbook
 - vii. MTM Injury and Illness Prevention Program
- b. City of Manteca, Injury and Illness Prevention Program
- c. City of Manteca, Incident Reporting and Investigation
- d. City of Manteca, Vehicle Use Policy
- e. City of Manteca, Hazard Communication Program
- f. Automobile Accident / Property Damage Investigation Report

Operations Hierarchy for the Manteca Transit, MTM Transit (Contractor)





Safety Management System (SMS) and Agency Safety Plan (ASP)

As Required Per 49 CFR 673



2023

Endorsements

Chief Executive Officer

Date

Chief Operations Officer

Date

Director of Risk Management

Date

Regional Director of Maintenance

Date

Director of Safety Administration

Date

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Safety Policy

Message from Alaina

MTM Transit, LLC has an internal Safety Culture Development program, which is designed to educate and instill a safety-first culture at all levels of MTM Transit using Federal Transit Administration (FTA) suggested elements of safety. Employee compensation is aligned with safety performance. To embrace and support our commitment to safety, we put safety first for our customers, clients, and employees.



Safety takes a preeminent role in decision making before all other considerations. This document serves collectively as MTM Transit's Safety Management System (SMS) and Agency Safety Plan (ASP). MTM Transit is committed to the requirements of this SMS/ASP as outlined in 49 CFR Part 673. Additionally, this SMS/ASP meets the FTA's Public Transportation Agency Safety Plan (PTASP) guidelines and integrates PTASP safety elements into all MTM Transit locations and operations. Using the procedures and processes detailed in this SMS/ASP, we will achieve a superior level of safety in our operations.

This SMS/ASP establishes hazard resolution mechanisms to guide our managers in our safety processes and training initiatives, as well as helps them identify and address hazards associated with our transportation services. It also ensures we evaluate the effect these proposed changes will have on safety, so we train employees properly on safety and create a culture of safety awareness.

MTM Transit adheres to safety requirements during implementations, and our management teams provide the ongoing support to achieve our SMS/ASP objectives. The success of this SMS/ASP depends on our employees understanding their responsibilities to meet the safety requirements of their positions and support the overall safety culture. Our success also depends on employees prioritizing safety above all else and identifying potential hazards.

The Chief Operating Officer, Regional Vice Presidents, Director of Safety Administration, Regional Directors of Maintenance, General Managers, Maintenance Managers, and Safety Managers will implement and administer a comprehensive hazard identification and mitigation plan tailored after the established Military Standard 882- E, as outlined in this SMS/ASP. This SMS/ASP will prevent, control, and resolve unsafe conditions and hazards which may occur

while providing service to our clients. The Executive Safety Committee developed this SMS/ASP, which applies to all MTM Transit locations and employees.

By using this SMS/ASP, MTM Transit will achieve optimal safety and develop an effective safety culture to reduce at-risk behaviors. This proactive approach dictates the organization, at all levels, remain actively engaged in the safety program.

As required by this SMS/ASP, each MTM Transit location will implement safety, health, and environmental controls and operating systems, procedures, and practices to maximize employee safety. All personnel will fulfill the safety requirements of their positions, and all supervisors and managers will enforce the safety requirements. Further, all personnel must support the implementation of this SMS/ASP and provide support to achieve program goals.

We must appreciate the fact our decisions and actions affect the safety of those in other areas of our operations. By following the processes described in this SMS/ASP, we will improve our operational performance and safety.

MTM Transit is an industry leader in safety and customer service and places the safety and security of our customers and employees above all else.

Best regards,



Alaina Maciá
President and Chief Executive Officer

Safety Administrative Control Requirements

This Safety Management System (SMS) and Agency Safety Plan (ASP) communicates system safety goals and documents/defines the safety responsibilities, activities, and capabilities established to promote and improve system safety throughout all operations and services MTM Transit operates. It is designed to meet the Federal Transit Administration (FTA) “Moving Ahead for Progress in the 21st Century” (MAP-21) Public Transportation Agency Safety Plan (PTASP) standards. This SMS/ASP includes responsibility for monitoring compliance of our transportation operations and support activities, and for reinforcing safe work practices to identify risks as well as reduce accidents and incidents.

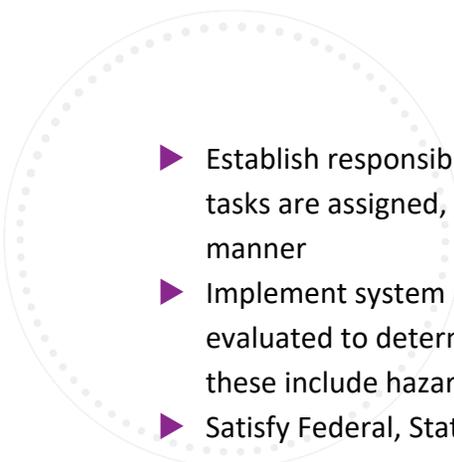
This SMS/ASP describes how accountability for system safety is integrated and shared throughout the organization. It establishes mechanisms to address the safety implications of system modifications prior to making changes. It also provides a systematic method to identify and resolve hazards in an expedient and cost-effective manner, while maintaining the safest possible operating environment. Further, this SMS/ASP provides the background, organizational structure, management processes, and descriptions of the operational facilities, systems, and personnel responsible to provide safe and reliable operations and maintenance. Finally, this SMS/ASP identifies the relationship and responsibilities between MTM Transit and State, Federal, and local agencies/organizations which impact our system safety. This SMS/ASP is the primary mechanism to achieve internal and external safety and regulatory requirements.

This SMS/ASP requires all transit-related activities include hazard and risk identification and control throughout the planning, development, modification, operation, maintenance, and disposition of all systems, equipment, facilities, and other properties throughout their life cycle. The policy, goals, and objectives of this SMS/ASP apply to all MTM Transit personnel, including all subcontractors. All employees and subcontractors must adhere to safe work practices when in contact with passengers, other employees, private property, and the public.

Purpose

The purpose of this SMS/ASP is to institute formal mechanisms to:

- ▶ Establish system-wide processes to identify and analyze hazards/risks associated with MTM Transit’s operations and to implement preventative actions to eliminate, control, and/or minimize their impacts by applying the FTA’s PTASP elements

- 
- ▶ Establish responsibilities, which are primarily hazard identification/analysis, and ensure tasks are assigned, understood, documented, and tracked in an organized and useful manner
 - ▶ Implement system safety policies and procedures which can be measured, audited, and evaluated to determine the effectiveness of our Safety Management System (SMS) – these include hazard and risk management activities and processes
 - ▶ Satisfy Federal, State, and local requirements

This SMS/ASP is used to prevent injuries, accidents, incidents, environmental damage, and other losses. It focuses on identifying hazards, assessing the levels of risk, and developing resolutions prior to the occurrence of an accident, incident, injury, illness, environmental damage, or other loss. As this hazard and risk identification/resolution process makes up the core of our SMS, MTM Transit will implement this process for every phase of our Safety Program, from conception through operation, and finally through disposition. The result of this process includes procedures and policies related to other subordinate and supportive aspects of our SMS, such as safety certification of newly acquired facilities, rolling stock, and operations.

The effectiveness of our SMS, as well as the hazard/risk identification and elimination processes described herein, are evaluated through internal reviews of day-to-day operations and activities. The internal reviews are used as a tool to modify safety-critical elements and system safety processes on a continuing basis, in turn optimizing operational safety and performance. The reviews are conducted according to industry standard practices and applicable regulations and requirements.

Scope

The FTA's PTASP and this SMS/ASP apply to MTM Transit's Safety Program in its entirety, including all employees affecting, or affected by, its operations and services throughout all design, construction, testing, operations, maintenance, and disposition phases. It is not possible to address all the specific safety-related responsibilities of personnel and departments in an SMS/ASP of this type. Relevant documents such as rulebooks, standard operating procedures, plans, and other procedures are referenced and should be reviewed to achieve a complete understanding of our SMS.

Goals

MTM Transit is committed to ensuring our operations and equipment are safe, and our employees and subcontractors always engage in safe work practices. MTM Transit has established a zero-tolerance policy for non-compliance with this SMS/ASP and considers public, employee, and passenger safety to be a paramount consideration in all decisions.

The goal of this SMS/ASP is to achieve the highest level of safety for all our clients, customers, employees, subcontractors, and the public. This SMS/ASP provides direction to all employees and subcontractors who are involved in activities providing or supporting MTM Transit's operations and services, ensuring a constant review of our records and practices through quality assurance activities, internal safety reviews, investigations, and daily oversight.

The goals of this SMS/ASP are to:

- ▶ Enable employees and subcontractors to identify, eliminate, minimize, and/or control hazards and their associated risks
- ▶ Promote and apply the FTA's PTASP safety process elements to all MTM Transit's safety processes
- ▶ Promote a high level of safety awareness among employees, managers, and subcontractor personnel
- ▶ Operate a fiscally responsible program, using good business principles to make safety a management and work performance indicator which is just as important as productivity and work quality
- ▶ Provide safe, secure, and reliable service which protects employees and passengers, as well as minimizes property damage to vehicles, facilities, and the environment
- ▶ Create a level of safety throughout MTM Transit's operations which exceeds other transit companies
- ▶ Comply with all applicable requirements of regulatory agencies, as well as all Federal, State, and local requirements
- ▶ Work with State, County, City, Metropolitan Planning Organizations, and other parties to examine transportation corridors, as well as consider land use, economic activity, population patterns, and connections among these elements and transportation
- ▶ Maximize the safety of future operations through the design and procurement process
- ▶ Foster the development of a system-wide safety program and safety culture

The MTM Transit Regional Vice Presidents, Director of Safety Administration, and Regional Directors of Maintenance have primary responsibility for monitoring the goals established by this SMS/ASP. Progress toward meeting stated goals is continually evaluated through an internal safety review process.

Safety Performance Targets and Indicators

MTM Transit has established the following performance indicators to monitor the ongoing success of our SMS:

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time or lost time)
- ▶ 95% or greater on-time performance
- ▶ Zero missed trips
- ▶ 100% on-time preventative maintenance services

In partnering with our clients, and in accordance with FTA 49 CFR 673, MTM Transit collectively sets the following Safety Performance Targets:

- ▶ Total number of fatalities reported, excluding suicides
- ▶ Fatality rate per vehicle revenue miles
- ▶ Total number of injuries reported to the National Transit Database (NTD), excluding assaults and other crimes
- ▶ Injury rate per total vehicle revenue miles
- ▶ Total number of safety events meeting the major reporting threshold reported to the NTD
- ▶ Safety events rate per vehicle revenue miles
- ▶ Average distance between major mechanical failures

An example of how MTM Transit tracks these safety performance targets is illustrated below.

Safety Performance Targets

(Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan)

Mode of Service	Fatalities	Fatalities (per 100k VRM)	Incidents	Incidents (per 100k VRM)	Safety Events	Safety Events (per 100k VRM)	System Reliability (VRM/failures)
Service Type	0	0	X	X	X	X	X
Service Type	0	0	X	X	X	X	X

Please Note: VRM stands for vehicle revenue miles.

Departments and Departmental Safety Goals

Contact Centers

Our contact centers' main functions are to manage trip intake entry for customers in MTM Transit contracts that require we take reservations. Many Customer Care Representatives (CCRs) and Support Representatives (SRs) work in contact centers across the country and use phones, chat, and methods of self-service actions. Our CCRs and SRs enter information on the customers' trips into various online routing, scheduling, and dispatching (RSD) systems such as Reveal, as well as other applicable forms.



Safety issues in the contact centers range from physically walking into buildings, obstructions in hallways, and areas with water which could make floors slippery. Tripping, slipping, and falling are the biggest concerns. There are smaller concerns, including not closing file cabinets and tripping or running into open drawers.

Safety Goals for Contact Centers

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)

SMS/ASP for Contact Centers

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through contact centers daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment

Finance and Accounting

MTM Transit's Finance and Accounting team establishes and executes financial and tax strategy and enforces policies for all financial activities. This team includes accounts payable and receivable, payroll, treasury, general accounting, financial reporting and analysis, budgeting and forecasting, pricing, data analytics, and financial audit. Our Finance and Accounting Department

is accountable for accurately reporting all monthly statistics related to accidents and incidents. Visibility into past performance creates a culture of accountability and motivates employees to improve. Furthermore, this department will support an effective Transit Asset Management (TAM) Plan, which keeps the fleet in a State of Good Repair (SGR).

Safety Goals for Finance and Accounting

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)

SMS/ASP for Finance and Accounting

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office area daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment

Information Technology

Information Technology (IT) manages the technology used throughout MTM Transit, as well as monitors and implements abatement strategies for cyber security threats. This includes the individual devices (e.g., laptops, tablets, monitors, etc.) and the applications on those devices, as well as the servers, networks, and software in MTM Transit data centers and partner data centers. The IT team acquires, installs, and maintains equipment and designs, develops, and maintains many of the applications used throughout MTM Transit. Most IT staff are in MTM Transit's locations in Lake Saint Louis and Maryville, Missouri, and Overland Park, Kansas, but there are also IT employees in other MTM Transit offices across the country. The main MTM Transit data center is in St. Louis, Missouri, with a back-up facility in Houston, Texas.

Safety issues in IT include movements at the office, lifting/carrying equipment, and repetitive stress issues. Injuries resulting from falling, straining, and repetitive work at computers are most concerning.

Safety Goals for Information Technology

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)

SMS/ASP for Information Technology

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office areas daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment

▲ Logistics Operations

Our Logistics Operations Department oversees all applicable non-emergency medical transportation (NEMT) recruitment and performance in MTM Transit contracts that require this service. Logistics Operations manages the availability of NEMT transportation and successful completion of trips for these contracts. MTM Transit's subcontracted NEMT transportation providers report all accidents and incidents through MTM Transit's Quality phone line and e-mail address. The Logistics Operations Department then follows up as needed on any issues.

Safety Goals for Logistics Operations

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)
- ▶ 95% or greater on-time performance
- ▶ Zero missed trips

SMS/ASP for Logistics Operations

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office areas daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment

▲ Legal and Risk Management

The Legal and Risk Management Department oversees all legal and external matters, including accidents, incidents, litigation, investigations, compliance, mergers and acquisitions, personnel matters, and contract matters. The basic mission of this department is to build a strategic system to manage staff, technology, subcontractors, and internal resources; to manage claims

and company-wide risk issues; and to track performance data and measure efficiency. The mission of Legal and Risk Management includes:

- ▶ Financial Management
- ▶ Subcontractor Management
- ▶ Cross-Functional Alignment
- ▶ Technology and Process Support
- ▶ Service Delivery and Alternative Support Models
- ▶ Organizational Design, Support, and Management
- ▶ Communications
- ▶ Data Analytics
- ▶ Regulatory Compliance
- ▶ Information Governance and Records Management
- ▶ Strategic Planning

Safety Goals for Legal and Risk Management

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)
- ▶ Zero workers' compensation injuries
- ▶ Zero wheelchair passenger injuries resulting from improper securement of the wheelchair in a vehicle
- ▶ Zero wheelchair passenger injuries resulting from improper securement of the passenger in the wheelchair with seatbelt or other fastening device

SMS/ASP for Legal and Risk Management

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office area daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment
- ▶ For Subcontractor Management, developing strong safety metrics for credentialing and approval of subcontracted transportation providers, operators, and vehicles
- ▶ Establishing stringent criteria for criminal background checks and motor vehicle operator records and approving or disapproving operators on these criteria metrics



Maintenance

Our Maintenance Department maintains MTM Transit's rolling stock, maintenance shops, and grounds at MTM Transit facilities, as well as provides maintenance for the vehicles we operate in contracts that require this service. This department maintains and tracks maintenance schedules for all vehicles MTM Transit operates, as well as manages repairs and part replacements. Some facilities operate 24 hours a day and perform most of their maintenance activities at night when more of the fleet is off the road.

Each maintenance employee completes training courses at the time of hire, including:

- ▶ Operator training, which covers defensive driving and safe vehicle operation
- ▶ Occupational Safety and Health Administration (OSHA) required topics and trainings
- ▶ Maintenance software training
- ▶ Applicable, local original equipment manufacturer (OEM) and vendor trainings for specific site-based equipment

Monthly safety meetings are conducted to refresh and retrain the maintenance employees on topics such as safe vehicle operation, OSHA, local safety items and initiatives, etc. Additionally, each MTM Transit location that has a maintenance facility has a specific maintenance plan outlining service requirements compliant with local, State, Federal, and contractual requirements.

Safety Goals for Maintenance

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)
- ▶ Clean shops to reduce hazards and injuries such as slips and falls
- ▶ OSHA compliance training for all shop employees
- ▶ 100% on-time preventative maintenance service
- ▶ Well-maintained vehicles that reduce safety issues

SMS/ASP for Maintenance

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through shop daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use shop equipment
- ▶ Providing hazard awareness training for 100% of maintenance employees

- ▶ Emphasizing shop cleanliness during training and employee performance reviews
- ▶ Fixing items which could cause potential injury to operators or passengers
- ▶ Following proper preventative maintenance program
- ▶ Ensuring vehicles are in safe working order prior to them going out on route

Marketing

Marketing works to identify and source potentially successful products and services for the marketplace we operate in and then promote these products. We promote our services through social media, online venues, search optimization, drip campaigns, tradeshow, trade group participation, public relations, and events. Marketing also supports business acquisition through the Request for Proposal (RFP) process. The RFP team scans the marketplace for RFPs fitting MTM Transit's guardrails, and then works with subject matter experts (SMEs) to prepare detailed and compliant responses, highlighting our company's competitive advantaged.

Marketing supports internal communication efforts through Core, the company's intranet, as well as through quarterly Vision presentations for employees and other communications. This function is important as it ensures all employees understand safety is core to our mission, vision, and values. Marketing plays a key role in creating safety-based digital and hard copy material necessary for safety programs and campaigns.

Safety Goals for Marketing

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)
- ▶ One or more safety posts on Core each month
- ▶ One or more safety recognitions each month
- ▶ One or more safety presentations at industry events each year
- ▶ One more publication of safety article in trade publication each year

SMS/ASP for Marketing

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office area daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment
- ▶ Using internal and external communication to emphasize our focus on safety

- 
- ▶ Recognizing and highlighting employees who embody the safety culture we are building
 - ▶ Becoming a thought leader for safety by presenting on safety at tradeshows, posting safety blogs on our website, and publishing safety articles in trade publications – this reinforces our safety message and attracts like-minded individuals who want to work for a company with a strong safety culture

Operations

Our Operations Department runs the day-to-day operations in the company and oversees MTM Transit sites where we conduct business for our clients. MTM Transit provides transit operations, as well as some NEMT services, for FTA recipients that provide public transportation services for paratransit and/or fixed route operations. MTM Transit conducts business operations in for clients across the country.

Operations personnel are located at the MTM Transit headquarters at Lake St. Louis, Missouri site and in assigned areas of the country. Local Operations leadership is also on-site at the locations where we provide transportation services for hands-on control of the services MTM Transit provides.

Safety Goals for Operations

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)
- ▶ 95% or greater on-time performance
- ▶ Zero missed trips
- ▶ 100% on-time preventative maintenance service
- ▶ Superior customer service and safe handling of all passengers

SMS/ASP for Operations

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office areas daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment
- ▶ Ensuring all operations employees follow safety policies and procedures



▲ People and Culture

As teams under the People and Culture Department, both Human Resources (HR) and Training support MTM Transit's safety goals. Our People and Culture Department strives to create a safe work environment for employees by raising awareness and acting on safety opportunities.

We believe in consistent communication, education, and training to raise awareness and impact our safety performance. Throughout various HR and Training initiatives, our teams integrate safety into our practices for all employees. We have developed and conducted Leadership Education and Development (LEAD) Training to educate leaders on the use of emergency preparedness, and we support the delivery of Transit and Paratransit Company (TAPTCO) training. Further, safety and emergency preparedness are topics included in all employee onboarding agendas.

Safety Goals for People and Culture

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)
- ▶ Annual compliance training received by 100% of new and existing employees, including general safety best practices, active shooter training, and identifying workplace safety hazards
- ▶ Using the #SafetyFirst email burst to track and correct all reported workplace hazards in partnership with the Facilities Department, such as worn rugs, wire hangings, burned out lights, slippery floor conditions, spills, and other unsafe workplace condition
- ▶ Educating the organization on safe workplace practices and policies which address both physical and emotional safety, through LEAD training, regular educational communications, annual compliance trainings, and general safety best practices

SMS/ASP for People and Culture

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office area daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment
- ▶ Partnering with the Facilities Department to address safety hazards at our various facilities

- ▶ Educating employees on safe workplace practices and policies, both physical and emotional safety
- ▶ Tracking of all OSHA reportable accidents and days lost due to accidents

▲ Procurement and Facilities

MTM Transit's Procurement and Facilities Department negotiates costs with our vendors; works with the Legal Department to prepare contracts for facilities and supplies; issues applicable purchase orders for supplies; manages the company's procurement and supplier relations processes; and ensures the functionality, comfort, safety, sustainability, and efficiency of the facilities and surrounding infrastructure we own and lease across the country. This department also helps to ensure and maintain the financial health of MTM Transit.

Safety Goals for Procurement and Facilities

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)

SMS/ASP for Procurement and Facilities

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office area daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment
- ▶ Partnering with the People and Culture Department to address safety hazards at our various facilities

Program Governance Oversight

MTM Transit's Program Governance oversight functions consist of:

- ▶ Project Management Office (PMO), which includes Business Implementation and Business Process Management
- ▶ Quality Operations, which includes Quality Evaluations through Automated Voice Analytics, Complaint and Incident/Accident Management, and Credentialing
- ▶ Compliance, which includes Internal Audit and Review, Compliance, and Investigation

The PMO team is the primary point of contact in managing projects and the processes for evaluating, prioritizing, and monitoring projects, initiatives, and opportunities across all areas of MTM Transit. This team manages all implementation activities surrounding new products, new clients, existing client expansions, and contract terminations. The PMO supports internal business initiatives, such as the Reveal software rollout, Salesforce development, protocol management, annual Operations Manual updates, and other process changes that impact multiple departments. Their goal is to ensure accountability and clear direction on the execution of project rollouts.

MTM Transit's Quality Operations and Compliance Departments oversee and monitor operations to ensure clients, subcontractors, and customers receive the highest quality services achievable. They track and trend complaints and satisfaction; monitor calls and report on quality outcomes; facilitate client audits and corrective action plans; perform internal audits of processes and procedures; maintain and review policies and procedures; and conduct investigations. Investigations may include examining suspected fraud and abuse. They also review liquidated damages and ensure contract compliance and manage MTM Transit's Compliance Program, which monitors performance metrics and program improvements.

Program Governance oversight also includes the implementation of client programs and monitors compliance with contractual requirements. They monitor any subcontracted transportation providers and operators to ensure they meet both client and MTM Transit credentialing standards; these standards include clean background checks, clean driving records, adequate insurance, up-to date licenses, and quality training to provide applicable NEMT for those contracts that require this service. For these subcontracted transportation providers, all vehicles must be titled, and safety inspected. Additionally, Program Governance investigates and reports on



complaints, incidents, and accidents, as well as monitors on-time performance, no-shows, and turn-backs for any subcontracted transportation providers. These teams also work with its partners in the field to address issues and identify root cause.

Safety Goals for Program Governance

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time and lost time)
- ▶ Analyzing and trending 100% of complaints compared to the prior year
- ▶ Validating and monitoring any subcontracted transportation providers, operators, and vehicle credentialing (checked daily)
- ▶ Monitoring any subcontracted transportation provider performance to ensure compliance with contract requirements, as well as Federal, State, and local laws and regulations (completed monthly)
- ▶ Conducting internal audit activities to ensure accountability to procedures, processes, and metrics (conducted quarterly)

SMS/ASP for Program Governance

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office area daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment
- ▶ Working with the People and Culture Department to manage the Compliance Hotline
- ▶ Immediately addressing reports of safety concerns

▲ Reveal

Reveal is an MTM Transit software program that provides a scheduling and tracking solution for several of MTM Transit's operations. This software program allows MTM Transit to provide some of our transit clients with a software solution for paratransit and fixed route services that competes favorably with other companies' software.

Safety Goals for Reveal

- ▶ Zero preventable incidents
- ▶ Zero employee injuries (non-lost time and lost time)

SMS/ASP for Reveal

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office area daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment
- ▶ Using the Reveal technology in as many MTM Transit locations as possible to increase on-time performance and prevent missed trips

▲ Safety

MTM Transit's Safety Department is responsible for communicating system safety goals to all MTM Transit. This department designs policies defining safety responsibilities, activities, and capabilities established to improve our system safety throughout all operations and services that MTM Transit operates. In addition, the Safety Department is responsible for meeting the FTA MAP-21 PTASP standards. They monitor compliance of transportation operations and support activities and reinforce safe work practices aimed at identifying risks and reducing accidents and incidents.

The Safety Department, in cooperation with other MTM Transit departments, confirms accountability for system safety is shared throughout the organization and establishes mechanisms for ensuring the safety implications of system modifications are adequately addressed. In conjunction with Legal and Risk Management, they are responsible for identifying and helping other departments resolve hazards in an expedient and cost-effective manner, while helping MTM Transit maintain the safest possible operating environment for MTM Transit's contracted services.

The Safety Department manages MTM Transit's safety functions such as compliance with federal, state, and local regulations, and oversees safety requirements for our contracts and clients we serve. Responsibilities include hazard management, accident investigation, safety certifications, and safety training. The Safety Department's Director of Safety Administration is the company's SMS/ASP subject matter representative. The Safety Department is responsible for developing our SMS/ASP implementation processes for MTM Transit; coordinating with key staff to support SMS/ASP implementation; facilitating the development of SMS/ASP processes and activities; procuring technical resources for SMS/ASP implementation; communicating SMS/ASP implementation progress and challenges; and socializing SMS/ASP activities with other executives and staff.

The Safety Department's SMS/ASP goals include:

- ▶ Identifying SMS/ASP implementation roles and responsibilities for the appropriate staff in conjunction with the MTM Transit Executive Safety Committee
- ▶ Helping senior management designate key staff who will support SMS/ASP implementation
- ▶ Ensuring key staff receive SMS/ASP training
- ▶ Developing an SMS/ASP implementation plan with the MTM Transit Executive Safety Committee, and communicating it throughout MTM Transit
- ▶ Briefing the stakeholders, Executive Safety Committee, and planning partners on the FTA PTASP and this SMS/ASP
- ▶ Helping the Executive Safety Committee develop and implement the SMS/ASP implementation plan

Safety Goals for Safety Department

- ▶ Zero preventable accidents
- ▶ Zero employee injuries (non-lost time or lost time)
- ▶ 95% or greater on-time performance
- ▶ Zero missed trips
- ▶ 100% on-time preventative maintenance service

SMS/ASP for Safety Department

- ▶ Working with facilities to ensure parking lots are safe (salted, paved with no holes, clearly lighted, etc.)
- ▶ Walking through office area daily to ensure all obstructions, including wires, boxes, and papers, are cleared off the floor and pathways
- ▶ Ensuring all employees are trained on best safety practices to use office furniture and equipment
- ▶ Providing guidance and oversight to other departments in the event of an accident or injury

Elements of the Public Transportation Agency Safety Plan (PTASP)

Introduction and Elements of the Program

The Federal Transit Administration's (FTA's) mandate "Moving Ahead for Progress in the 21st Century" (MAP-21) recommendations require all transit agencies to develop an Agency Safety Plan (ASP), which complies with the FTA statute element guidelines under the FTA's Bus Safety Management Program, which is also supported and outlined by the American Public Transportation Association (APTA). MAP-21's Public Transportation Agency Safety Plan (PTASP) outlines requirements which must be met by all FTA-funded transit systems operating in the United States. Since MTM Transit provides public transportation for transit agencies in the United States, we created this SMS/ASP for our company safety guidelines to meet or exceed the FTA's PTASP requirements. Our SMS/ASP has four primary elements, which are described below.

▲ Element #1: Safety Policy

Establishes senior management's commitment to continually improve safety; defines the methods, processes, and organizational structure needed to meet safety goals

- ▶ Establishes management commitment to safety performance
- ▶ Establishes clear safety objectives and commitment to manage those objectives
- ▶ Defines methods, processes, and organizational structure needed to meet safety goals
- ▶ Establishes transparency in safety management
- ▶ Provides fully documented policies and processes
- ▶ Maintains employee reporting and resolution systems
- ▶ Provides accountability of management and employees
- ▶ Builds upon the existing processes and procedures
- ▶ Facilitates cross-organizational communication and cooperation

▲ Element #2: Safety Risk Management

Determines the need for, and adequacy of, new or revised risk controls based on the assessment of acceptable risk

- ▶ A formal process within the SMS/ASP composed of:
 - Describing the system
 - Identifying the hazards
 - Assessing the risks
 - Analyzing the risks
 - Controlling the risks
- ▶ The SMS/ASP process may be embedded in the processes used to provide the product/service

▲ Element #3: Safety Assurance

Evaluates the continued effectiveness of implemented risk control strategies; supports the identification of new hazards

- ▶ Includes process management functions which systematically provide confidence to ensure organizational outputs meet or exceed safety requirements
- ▶ SMS/ASP has a dual safety assurance focus:
 - Product/service providers
- ▶ Ensures compliance with FTA PTASP requirements and FTA orders, standards, policies, and directives
 - Information acquisition
 - Audits and evaluations
 - Employee reporting
 - Data analysis
 - System assessment
- ▶ Will investigate safety events and reports, as well as develop corrective actions to address these events and prevent reoccurrence
- ▶ Provides insight and analysis regarding methods and opportunities for improving safety and minimizing risk
- ▶ Existing assurance functions continue to evaluate and improve service

▲ Element #4: Safety Promotion

Includes training, communication, and other actions to create a positive safety culture within all levels of the workforce

- ▶ Safety promotion activities within the FTA PTASP framework include:
 - Providing SMS/ASP training
 - Advocating and strengthening a positive safety culture
 - System and safety communication and awareness
 - Matching competency requirements to system requirements
 - Disseminating safety lessons learned
- ▶ Everyone has a role in promoting safety

These four supporting elements are comprised in different areas of this SMS/ASP in the order they are listed above. As an example, Safety Risk Management is covered in the next section of this SMS/ASP, followed by Safety Assurance and Safety Promotion. Our Safety Policy section is immediately following the Table of Contents.

Safety Risk Management

Safety Risk Management uses hazard identification and hazard resolution to assess the needs of the organization and mitigate risk. Hazard identification, analysis, and resolution (i.e., Hazard Management) is the process used to identify, analyze, and mitigate hazards associated with the design, construction, testing, start-up, and operation of MTM Transit's locations and services to ensure the safety of customers, employees, and the public. All hazards are categorized by severity and probability of occurrence, analyzed for potential impact, and resolved by design, procedures, warning devices, and/or other methods so they fall within the prescribed level of risk acceptable to MTM Transit.

Overview

The hazard management process is designed to proactively identify, eliminate, and control hazards before losses occur. It serves as the cornerstone of the SMS/ASP and is based on a methodology which involves:

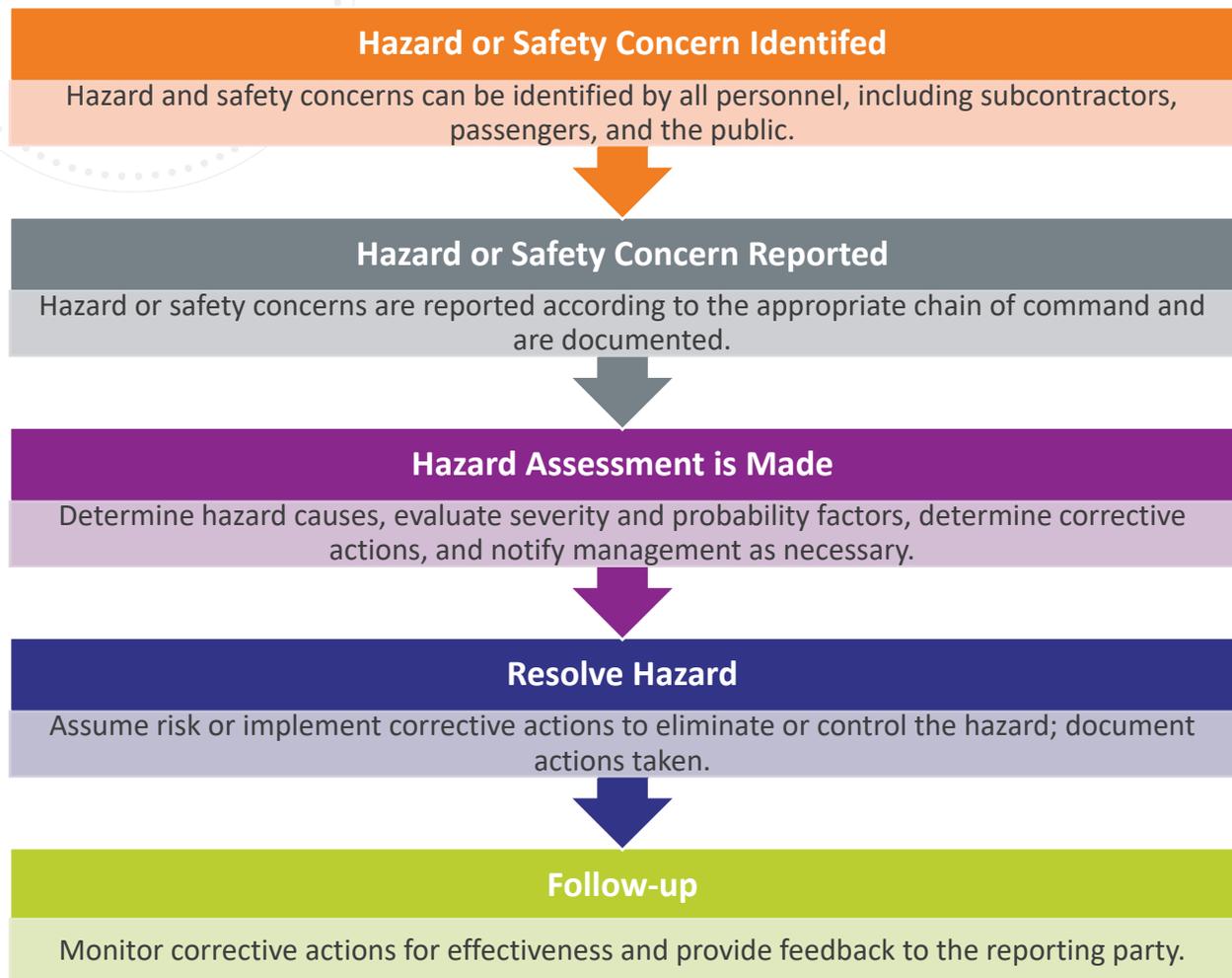
- ▶ MTM Transit employees' understanding of its systems/functions and how these systems/functions relate to and interface with client operations and services
- ▶ Identifying the critical elements and steps (i.e., inspections, modifications, reviews, analyses, tests, etc.) necessary to achieve the desired level of safety
- ▶ Establishing processes and management controls to ensure identified critical elements and steps are consistently carried out
- ▶ Monitoring compliance with the processes established through safety data analysis, management reports, observations, internal audits, inspections, reviews of documentation, and other means
- ▶ Improving the processes by reviewing effectiveness of management controls in achieving the desired level of safety (i.e., through internal safety audits) and then modifying safety critical elements and processes on a continuing basis

Hazard Management Process – Activities & Methodologies

A hazard is any condition or set of conditions, internal or external to the system or system operation which, when activated, can cause injury, illness, death, or damage, including loss of equipment, property, or severe environmental damage. MTM Transit ensures all our personnel and subcontractors use acceptable hazard identification, analysis, and resolution methods as they pertain to the delivery of our clients' operations and services.

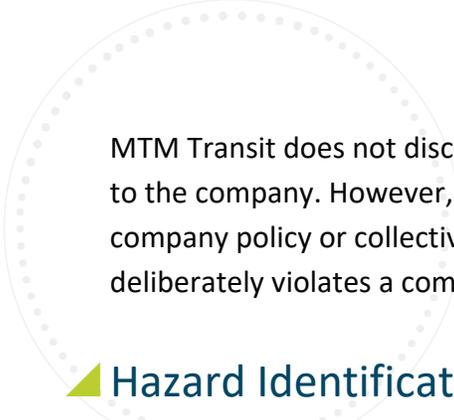
Hazard Reporting

MTM Transit's hazard reporting process is depicted in the diagram below.



All employees are instructed to report any hazards encountered in the workplace. To report hazards, MTM Transit has made the following means available to all employees:

- ▶ **Workday App.** Each employee can log into the Workday app and report any hazards identified by selecting “Report Safety Incident” and then selecting “Hazard-Observation.” The hazard report is then sent to the local management team for assessment and follow-up.
- ▶ **Local Safety Committees.** During monthly safety committee meetings, reported hazards may be brought to the committee’s attention to address, create mitigation plans, and then close out if practical.
- ▶ **Reporting Directly to Local Management Team.** Any hazard may be reported directly to a member of the local management team at any time.



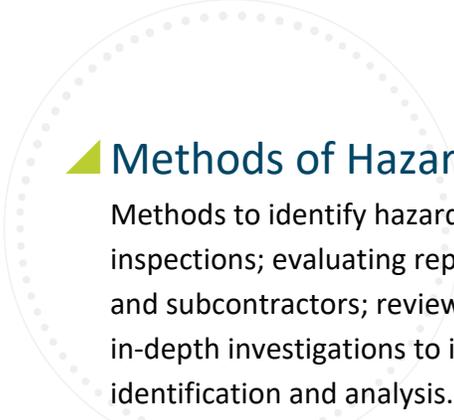
MTM Transit does not discipline or retaliate against an employee who reports a safety hazard to the company. However, MTM Transit reserves the right to discipline – in accordance with company policy or collective bargaining agreements – any employee who intentionally or deliberately violates a company safety policy.

▲ Hazard Identification and Analysis

The objective of the hazard identification and resolution process is to identify and define as many credible hazardous conditions as possible and to eliminate or control these conditions or associated activities prior to their causing or contributing to an accident, incident, injury, death, or other major loss or undesired event. This proactive approach stresses the thorough evaluation of systems and proposed modifications from a safety perspective before losses occur. The hazard identification/resolution process applies to all MTM Transit's operations and services, with special emphasis placed on the initial stages of the design process for new equipment and new start-up projects, including applying the hazard identification and resolution process prior to implementing modifications of existing facilities, systems, or rolling stock. This is due to the large impact these activities often have on the system. Emphasis is also placed on the processes used for employee screening, hiring, and training, as these are key to preventing accidents.

Elimination and control of hazards requires evaluating the cause and consequence of a hazard; eliminating or controlling the hazard; and implementing and monitoring hazard mitigations. All employees are responsible for identifying, reporting, and, when possible, eliminating or controlling hazards they encounter. MTM Transit identifies and reports hazards to our clients, including passenger complaints.

The hazard analysis process attempts to determine the factors that led to the hazard, likely or potential outcomes, and the impacts these outcomes will have on the system. This includes evaluation of the risks and priority associated with the hazard. Once these are evaluated, we take action to mitigate, control, or eliminate the hazard and its associated risks. Hazard management attempts to reduce the severity of accidents and incidents by introducing protective devices and equipment, procedures, and/or system modifications to reduce the amount of human and property damage in the event of an accident or incident.



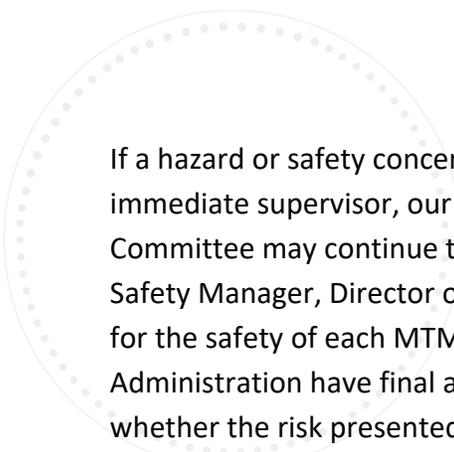
▲ Methods of Hazard Identification

Methods to identify hazards include conducting system inspections, audits, and regulatory inspections; evaluating reported hazards and complaints received from employees, customers, and subcontractors; reviewing accidents, incidents, and system failure reports and conducting in-depth investigations to identify causes; and conducting inductive and deductive hazard identification and analysis. While identifying every hazard within a system is impossible, the implementation of one or all these methods can greatly increase an agency's ability to identify and eliminate or control hazards.

Through the implementation of this SMS/ASP, MTM Transit has established a formal process for hazard identification and analysis through self-identification. This is done either through employees, management techniques such as inspections and audits, or reviews of daily operating reports to identify trends. Conducting inspections and audits includes leading site surveys and personnel interviews to evaluate employee work practices and work environments. The inspection portion of this method is used daily by all personnel during the performance of their job duties and requires an attentive eye or the use of safety checklists. Evaluating employee, customer, and location reports of hazards requires more in-depth activities, including conducting site surveys or performing interviews.

MTM Transit personnel are instructed to identify and report hazards or potential hazards, as well as to secure the hazard area until it can be properly controlled or eliminated. Identified hazards are to be reported immediately, according to the proper chain of command and either verbally or by using the Hazard Identification Program Reporting Form, to the employee's direct supervisor, department manager, and/or the Safety Manager or General Manager. Hazards can also be reported to our Safety Committee. An employee reporting a hazard, along with their direct supervisor, are required to formally document the hazard or safety concern. All reports are investigated, and hazards and deficiencies are corrected or resolved.

This SMS/ASP encourages all employees to become safety officers and does not allow for discipline to any employees for reporting hazards, unsafe acts, or unsafe conditions. All reporting of unsafe acts and conditions is recognized as a proactive safety measure by MTM Transit.



If a hazard or safety concern is so severe it cannot be addressed by reporting to an employee's immediate supervisor, our General Manager is notified. While MTM Transit's staff and Safety Committee may continue to develop acceptable corrective actions, the General Manager, Safety Manager, Director of Safety Administration, and Regional Vice President are responsible for the safety of each MTM Transit location. The Regional Vice President and Director of Safety Administration have final authority and approval of the corrective actions to be taken and whether the risk presented by the hazard is acceptable. The Regional Vice President and Director of Safety Administration's decision is formally documented, and the results of employee reports are communicated back to the employee.

It is the responsibility of all employees to identify and report hazards and unsafe conditions. However, while Safety Managers and Safety Supervisors work in or travel through various facilities and properties, they may identify hazards or unsafe conditions. As this occurs, if the hazard or unsafe condition cannot be immediately eliminated or controlled, the Safety Supervisor reports the hazard to the General Manager for resolution.

MTM Transit also identifies hazards through reviewing accidents, incidents, and system failure reports, as well as by conducting in-depth investigations to identify causes. Although MTM Transit strives to prevent these problems, they can be used to improve the work environment and eliminate hazards. MTM Transit conducts comprehensive investigations of these types of events, which determine their underlying causes and identify hazards not readily identifiable during daily operations or through inspections, audits, or employee, customer, or subcontractor reports. Once identified, the hazards are eliminated or controlled and tracked through a hazard identification log.

Hazard Categorization and Risk Management

Once hazards have been identified, MTM Transit evaluates them to determine the level of risk or impact they may have on the system. Generally, the greater the probability of a hazard to cause injury or loss, the greater the risk is, and the greater the need to resolve the hazard. The severity of the consequences the hazard may present are taken into consideration when evaluating the level of risk associated with the hazard.

For each location, MTM Transit assesses levels of risk, determines what actions need to be taken to correct identified hazards, and documents all hazards and their associated risks. This assessment system is based on the United States Military's MIL-STD-882E and is a qualitative calculation based on largely subjective judgments used to determine the risk associated with each hazard and the urgency for implementing corrective measures to eliminate or reduce risk.

This risk assessment system has been incorporated into formal system safety analysis and enables decision makers to understand the risk involved in accepting a hazard in relation to the cost (schedule, dollars, operations, etc.) to reduce the hazard to an acceptable level.

Risk assessment includes evaluating hazard severity (categorizing the hazard) and evaluating hazard probability. Factors considered in this analysis include impact to project schedule and impact on the public's perception of safety on the system in the community.

Hazard Severity

Hazard severity is a subjective determination of the worst case which could result from human error, design inadequacies, component failure, or malfunction. Each level of severity is attributed both physical description (i.e., fatality, injury, property damage, etc.) and monetary value. The levels of severity are as follows:

- ▶ **Category 1, Catastrophic.** Hazard could result in death, permanent total disability, loss exceeding \$1 million, or irreversible severe environmental damage which violates law or regulation.
- ▶ **Category 2, Critical.** Hazard could result in permanent total disability, injuries or occupational illnesses which may result in hospitalization of two or more persons, loss exceeding \$200,000, but less than \$1 million, or reversible environmental damage that violates law or regulation.
- ▶ **Category 3, Marginal.** Hazard could result in injury or occupational illness resulting in one or more lost workdays, loss exceeding \$10,000, but less than \$200,000, or mitigatable environmental damage without violation of law or regulation where restoration activities can be accomplished.
- ▶ **Category 4, Negligible.** Hazard could result in injury or illness not resulting in a lost workday, loss exceeding \$2,000, but less than \$10,000, or minimal environmental damage not violating law or regulation.

Hazard Probability

Hazard probability is described quantitatively in potential occurrences per units of time, miles, trips/runs, or passengers carried. A hazard probability may be derived from the analysis of transit system operating experience, evaluation of each location safety data, or from historical safety data from other transit contracts MTM Transit operates. The probability levels are defined as follows (probability level definitions were derived from United States Military Standard 882E):

- ▶ **A – Frequent.** Likely to occur frequently to an individual item; continuously experience in the system; Mean Time Between Events (MTBE) less than 1,000 operating hours.

- ▶ **B – Probable.** Will occur several times in the life of an item; will occur frequently in the system; MTBE equal to or greater than 1,000 operating hours and less than 100,000 operating hours.
- ▶ **C – Occasional.** Likely to occur sometime in the life of an item; will occur several times in the system; MTBE equal to or greater than 100,000 operating hours and less than 1,000,000 operating hours.
- ▶ **D – Remote.** Unlikely, but possible to occur in the lifetime of an item; unlikely but can be expected to occur at some time in the system; MTBE greater than 1,000,000 operating hours and less than 100,000,000 operating hours.
- ▶ **E – Unlikely.** So unlikely to occur, it can be assumed occurrence may not be experience; unlikely, but possible to occur in system; MTBE greater than 100,000,000 hours.

Hazard risk classification combines the hazard severity and probability into a single risk index. The hazard risk index values are used by grouping hazards into categories, which can be used to generate specific actions such as mandatory reporting of the most severe hazards to management for action. The table below provides the hazard risk matrix used by MTM Transit to determine the actions taken in response to reported hazards.

Hazard Risk Matrix				
Probability of Occurrence	Severity of Occurrence			
	Category 1 Catastrophic	Category 2 Critical	Category 3 Marginal	Category 4 Negligible
A – Frequent	1A	2A	3A	4A
B – Probable	1B	2B	3B	4B
C – Occasional	1C	2C	3C	4C
D – Remote	1D	2D	3D	4D
E – Unlikely	1E	2E	3E	4E

Hazard Risk Index	Criteria by Index
1A, 1B, 1C, 2A, 2B, 3A	Unacceptable
1D, 2C, 2D, 3B, 3C	Undesirable – Management Decision Required
1E, 2E, 3D, 3E, 4A, 4B	Acceptable With Management Review
4C, 4D, 4E	Acceptable Without Review

Hazard and Risk Resolution

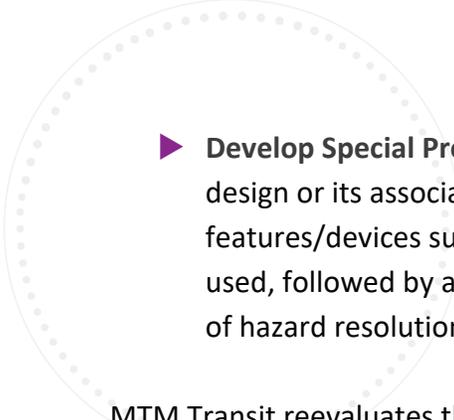
Hazard and risk resolution is the corrective action taken in response to the hazard identification and risk assessment process. Both time and resource restrictions determine the level of resolution that can be accomplished. When possible, the MTM Transit department in which the hazard exists works with the local Safety Manager to develop and implement the approved corrective action plans. Both the Safety Manager and the applicable department track the corrective actions until the hazard is eliminated or controlled.

The goal is to first eliminate the hazard (if possible) and then reduce its risks if it cannot be eliminated. If the risk cannot be eliminated or reduced, or if it is impossible or impractical to eliminate the hazard, the General Manager may choose to accept the risk for all hazards related to MTM Transit's operations. In these cases, we ensure compliance with all applicable rules, procedures, policies, and regulatory requirements. If the General Manager accepts the risk, it must be approved by the Chief Operating Officer, the Director of Safety Administration, and applicable Regional Vice President.

MTM Transit resolves hazards by either engineering or management controls. Engineering controls are changes made to the system to eliminate hazards or mitigate their risks. An example may be building a separate storage facility for hazardous chemicals or installing a protective barrier around rotating machinery. Management controls are changes made to the organization itself; an example may be posting signs or changing procedures to limit employee exposure to the hazard.

MTM Transit uses the following order of precedence to eliminate or control hazards and their associated risks. A combination of several or all the following may be used, depending on the nature and extent of the hazard:

- ▶ **Design for Minimum Risk.** Design will attempt to eliminate hazards. If an identified hazard cannot be eliminated, its associated risk is reduced to an acceptable level through design selection. This may be constrained by time, money, manpower, or other limitations.
- ▶ **Incorporate Safety Devices.** If the hazard cannot be eliminated or its risk controlled to an acceptable level, safety design features or devices are used to reduce risk to an acceptable level.
- ▶ **Provide Warning Devices.** If neither design nor safety features/devices can reduce the risk to an acceptable level, warning devices are used to detect the condition and produce an adequate warning signal to alert individuals to the hazard. Warning signals and their operation are designed to minimize the probability of individuals reacting incorrectly to the signals and are standardized and similar.

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- ▶ **Develop Special Procedures and Training.** If the hazard cannot be eliminated through design or its associated risk adequately controlled through design selection, safety features/devices such as personal protective equipment (PPE) or warning devices are used, followed by approved procedures and training. This is the least effective method of hazard resolution.

MTM Transit reevaluates the control method after its implementation to determine and verify its effectiveness. If the hazard has been eliminated or controlled, or if level of risk presented by the hazard is deemed to be acceptable, the Safety Manager documents this decision and notify all affected parties.

Minimum Requirements for Notification of Unacceptable Hazardous Conditions and Corrective Action Plans

Each MTM Transit location must notify the Director of Safety Administration of all unacceptable hazardous conditions. At a minimum, the Director of Safety Administration must be notified of:

- ▶ Malfunctions of safety critical systems that could result in a catastrophic or single-point failure
- ▶ Broken or missing safety-critical equipment, infrastructure, or systems that could result, or have resulted in, employee or passenger injury/damage to client or MTM Transit property
- ▶ All complaints and safety-related comments that cannot be resolved locally and require support from the MTM Transit support team

The local Safety Manager investigates all reported hazards to identify root causes. The Director of Safety Administration works with the local Safety Manager and all necessary departments and personnel to develop and implement corrective action plans to eliminate or control the hazardous condition. Corrective actions developed by each MTM Transit location are submitted to the Director of Safety Administration and their Regional Vice President for review and approval prior to their implementation.



▲ Safety Data Acquisition and Analysis

MTM Transit gathers and analyzes safety program data through our fleet maintenance software database and other company databases. We use this software to monitor and evaluate the effectiveness of each location's maintenance safety program and identify areas requiring additional attention; to measure MTM Transit's progress in meeting safety-related performance targets; and to meet reporting requirements. Data that MTM Transit analyzes includes employee injury and illness data, vehicle accident data, and operator and supervisor reports. MTM Transit is required to notify our corporate team and insurance reporting hotline of all accidents and incidents which have occurred, including the type and severity of each accident/incident.

Our General Managers and Safety Managers track reported hazards through the Hazard Identification Log, which is used for trend analysis, enabling the identification and resolution of potential system-wide hazards or deficiencies. The Hazard Identification Program Log stores, maintains, and tracks the corrective actions and the status of identified and reported hazards, and internal and external safety review findings. The Hazard Identification Program Log also serves as a management tool and repository for past and future safety hazards identified by MTM Transit, passengers, and outside agencies such as the Federal Transit Administration (FTA). MTM Transit uses the data included in the Hazard Identification Program Log to generate reports which enable management to monitor safety performance over time.

MTM Transit provides the data necessary for our clients to make its monthly reports to the National Transit Database (NTD) in accordance with NTD reporting criteria. These reports provide information pertaining to the different types of accidents and incidents, the total number of accidents and incidents, and the frequency rates of accidents and incidents. MTM Transit also tracks employee accident and incident trends through the Occupational Safety and Health Administration (OSHA) 300 injury and illness log to determine high-hazard work areas or job classifications, employee training and re-training needs, or to determine the levels of disciplinary action required following an accident or incident. Data is also gathered regarding workers' compensation claims and costs and is used for insurance purposes.

Vehicle maintenance and equipment failure data is gathered by MTM Transit to ensure preventative maintenance is being conducted on time and to evaluate equipment quality and warranty period performance. Equipment that fails within the time frame of the warranty period can be replaced at limited or no cost under the provisions of the warranty. Information pertaining to equipment that repeatedly fails or that requires high maintenance costs provides management with reasoning necessary for discontinuing its use and selecting different equipment or a different equipment manufacturer.



Once gathered, identified hazards are linked to the Hazard Management Process and used to correct, track, and report identified hazardous work areas and job classifications. Areas and job classifications with high accident, incident, injury, and/or illness rates will typically contain hazardous conditions which cause or contribute to accidents, incidents, injuries, and illnesses. These identified hazards are investigated to find the root cause and causal factors. Recommendations are provided to eliminate, mitigate, and/or control the hazards.

Safety Assurance



MTM Transit monitors safety through data analysis and our Internal Safety Auditing (ISA) Program, which has many components including performance targets and indicators, a hazard management program, and an emergency management plan.

To ensure safety across our organization, MTM Transit identifies and determines the causes and implications of substandard performance and eliminates or mitigates these causes. Safety Assurance activities include:

- ▶ Investigating accidents and incidents to identify root causes
- ▶ Developing and maintaining formal activities to assess and control safety risks
- ▶ Monitoring and auditing operational and maintenance processes, including those of subcontracted service providers
- ▶ Monitoring the effectiveness of corrective action plans
- ▶ Managing processes which enable employees to report hazards
- ▶ Maintaining formal activities to identify service changes
- ▶ Implementing processes to maintain safety performance
- ▶ Eliminating or modifying safety risk controls which are no longer needed

Safety Performance Monitoring

MTM Transit's process for monitoring the performance of our SMS/ASP for each of our locations begins with regularly monitoring progress toward achieving performance targets and indicators. MTM Transit collects and analyzes program data monthly to determine if performance targets are being met. Summary statistics are presented to MTM Transit's corporate management team that highlight areas where targets are being missed and surpassed. All instances in which targets are not being met are discussed to determine the reasons and implement corrective actions.

Safety performance is also monitored through an Internal Safety Auditing (ISA) Program designed to measure the ongoing effectiveness of our SMS/ASP and determine the extent to which departments, personnel, and subcontractors are fulfilling their responsibilities under the SMS/ASP. It is the objective of the ISA Program to verify on an ongoing basis which safety processes have been developed and implemented in accordance with our SMS/ASP and the Federal Transit Administration's (FTA's) Public Transportation Agency Safety Plan (PTASP)

throughout MTM Transit’s operations. It is also the objective of the ISA Program to assess the effectiveness of the safety processes; to identify process deficiencies, potential hazards, and system risks; to verify prior corrective actions are being tracked for closure and to evaluate their effectiveness; and to recommend system safety improvements. Any subcontractor-provided services may be added and included in the program. The ISA Program encompasses the review and evaluation of the following:

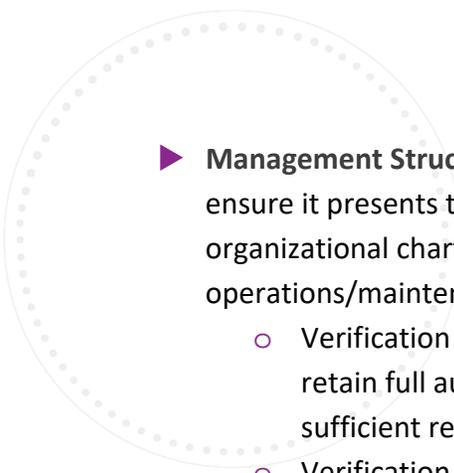
- ▶ **Policy Statement.** An annual review of the Policy Statement is completed to ensure consistency with the most current practices and management objectives for each of our location contract programs. The policy statement describes the authority which establishes the SMS/ASP and is signed by the Chief Executive Officer or Chief Operating Officer.
- ▶ **Purpose, Scope, Goals, and Objectives.** An annual review of our SMS/ASP is completed to ensure the purpose of the Plan is defined and consistent with the most current management goals. Goals are identified to ensure the SMS/ASP fulfills its purpose. Objectives are identified to monitor and assess the achievement of goals.
- ▶ **Performance Targets and Indicators.** Performance Targets and Indicators are reviewed annually to determine performance; they are revised as necessary to strive towards continual performance improvements. Stated management responsibilities are also identified. As mentioned previously, if partnering with a transit agency client, the following safety Performance Targets are implemented:

Safety Performance Targets

(Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan)

Mode of Service	Fatalities	Fatalities (per 100k VRM)	Incidents	Incidents (per 100k VRM)	Safety Events	Safety Events (per 100k VRM)	System Reliability (VRM/failures)
Service Type	0	0	X	X	X	X	X
Service Type	0	0	X	X	X	X	X
Service Type	0	0	X	X	X	X	X
Service Type	0	0	X	X	X	X	X

Please Note: VRM stands for vehicle revenue miles.

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- ▶ **Management Structure.** Every two years, a review of the SMS/ASP is completed to ensure it presents the most current management and organizational structure, including organizational charts, scope of services, physical characteristics, and operations/maintenance aspects. This review includes:
 - Verification the Chief Operating Officer and Director of Safety Administration retain full authority for implementing an SMS/ASP for all locations, ensuring sufficient resources are being allocated to implement the Plan
 - Verification each location General Manager has authority to support the implementation of the SMS/ASP equivalent to that of other Managers and Senior Leaders
 - Verification the SMS/ASP has been approved and adopted by each of our clients
 - Review of stated safety functions and how they are integrated throughout each location's operations and services

 - ▶ **SMS/ASP Review and Modification.** An annual review of the SMS/ASP is completed to ensure it meets applicable regulatory requirements and remains consistent with the PTASP as issued by the FTA. This review also includes verifying MTM Transit has processes in place to ensure this SMS/ASP remains a controlled document but is also easily accessible to all personnel and subcontractors working for MTM Transit. This annual review includes verification only the most recent controlled copies of the SMS/ASP have been issued and are being used.

 - ▶ **Plan Implementation.** Entails a review of the activities conducted by the MTM Transit location to implement and administer the SMS/ASP for the respective locations, including the activities, tasks, and responsibilities of each MTM Transit location under the Safety Management System (SMS) Program. This includes a review of all tasks performed by position and management accountability to implement and administer the SMS/ASP, as well as all supporting procedures, policies, and documents.

 - ▶ **Hazard Management Program.** Entails a thorough review of the process for identifying, evaluating, controlling, and tracking hazards and risks, including the development and management of corrective action plans and their status. This includes the evaluation of processes used to implement the hazard management program throughout MTM Transit's operations and services.

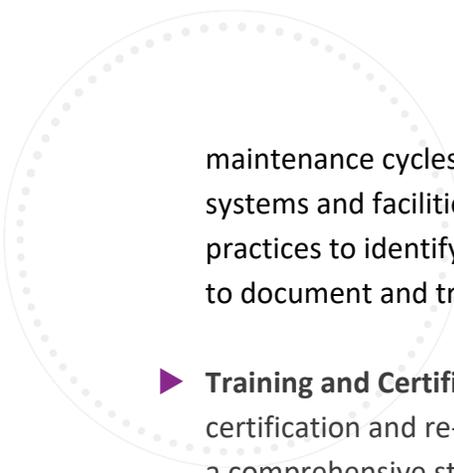
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- ▶ **Management of Change.** Includes reviewing MTM Transit configuration management processes, including those of each client contract, as they pertain to each location to verify their effectiveness. This includes reviewing processes for:
 - Making changes to location operating and maintenance rules and procedures affecting safety to ensure they remain applicable and correct, without introducing new hazards
 - Safety and Security Certification of new start-up projects, as well as major projects to extend, rehabilitate, or modify existing systems, or to procure or replace vehicles and equipment
 - Maintaining safety during System Modifications which do not require formal safety and security certification, but which have safety impacts
 - Procurement management to ensure safety principles are included to prevent the introduction of unsafe equipment and materials into MTM Transit's operations and services

 - ▶ **Safety Data Acquisition and Analysis.** Includes evaluation of the processes used to collect and analyze safety-related data and the processes used to determine trends as they relate to system safety.

 - ▶ **Accident and Incident Reporting and Investigation.** Includes evaluation of the processes used to notify outside agencies of accidents involving each location, including the National Transportation Safety Board (NTSB), the FTA, and the Occupational Safety and Health Administration (OSHA). Each MTM Transit location holds primary responsibility for making these notifications with support by the Director of Safety Administration. We also evaluate the processes used to investigate and identify accident and incident causes; develop and implement corrective actions; and corrective actions with other outside entities as necessary.

 - ▶ **Emergency Management.** Includes reviewing emergency plans and procedures to ensure applicability with MTM Transit's operations and services, social behavior, and technologies, as well as emergency response agency implications and the effectiveness of processes for interdepartmental coordination.

 - ▶ **Facility and Equipment Maintenance Audits and Inspections.** Includes identifying facilities, equipment, and systems subject to regular safety-related inspections and testing, as well as processes for reporting, documenting, and tracking deficiencies, hazards, and corrective actions. This also includes identifying and verifying established



maintenance cycles and required documentation of maintenance performed on these systems and facilities, as well as inspections and audits of procedures and work practices to identify deficiencies, trends, and signs of sabotage, and the methods used to document and track deficiencies, hazards, and corrective actions.

- ▶ **Training and Certification Review and Audits.** Includes review of MTM Transit’s training certification and re-certification programs, policies, procedures, and processes to ensure a comprehensive staff training program exists for operations personnel and personnel directly responsible for safety, ensuring these programs are effective. It also includes verifying an adequately trained Safety Supervisor conducts safety training.
- ▶ **Hazardous Materials Program.** Includes the review of hazard communication programs and processes for chemical storage, procurement, Safety Data Sheet (SDS) reviews, environmental management programs, and container labeling.
- ▶ **Drug and Alcohol Program.** Includes the review of drug and alcohol policies to ensure consistency with State, Federal and local regulations, as well as management policies and compliance with stated drug and alcohol policies.

▲ Internal Safety Audit Program

MTM Transit, while fully involved in the operations and services of each contract, is responsible for overseeing the ISA Program to ensure the SMS/ASP is being implemented and continuously measured for effectiveness.

The results of each internal review and audit are provided in an Audit Report listing a summary of the findings, detailed recommendations to correct open items, and an initial hazard analysis. Open findings are documented in the audit’s Action Plan Log, where all findings, recommendations, corrective actions, responsible departments/personnel, estimated closure dates, and status information are maintained. For each hazard and deficiency identified, a hazard risk assessment value is determined so the hazards and deficiencies can be prioritized for closure.

The MTM Transit Regional Vice Presidents and Director of Safety Administration plan a safety audit schedule for those locations scheduled for a review. At least seven days of notice is given to each location detailing the specific dates and times of the internal safety review along with a request for specific documentation to be evaluated during the review.

Accident/Incident Notification, Reporting, & Investigation

MTM Transit’s SMS/ASP is a proactive method of improving safety designed to identify and eliminate hazards before they can cause or contribute to accidents/incidents, rather than the traditional approach of reacting after accidents/incidents occur. Under this framework, the occurrence of an accident or incident can be viewed as a failure of the System. When implemented fully, the SMS/ASP acts as an accident prevention program. While it is the goal to provide accident-free service, this goal is not easily achievable in the public transit environment where the delivery of service is affected by numerous outside and uncontrollable factors. When accidents/incidents occur, MTM Transit investigates to identify root causes and contributing factors so future events can be prevented. Effective accident/incident reporting and investigation is a key component of the Safety Assurance process.

MTM Transit conducts a formal, objective investigation of all accidents and incidents involving people or property, regardless of origin, the operators involved, or the responsible party. As part of our accident/incident investigation procedures, MTM Transit maintains accurate accident and incident data, including:

Accident/Incident Type		
Backing	Left Turns	Right Turns
Merging	Intersections	Fixed Objects
Sideswipes	Hit in Rear	Passenger Falls
Rear-ends	Passenger Behavior	Wheelchair Securements
Pedestrian Incidents	Bicycle Incidents	Thermal Events

National Transit Database (NTD) Reportable Accidents include events that are related to or affect revenue service, affect persons engaged with the transit system, and meet one or more of the following reporting thresholds:

- ▶ Fatality, including suicides
 - Deaths resulting from illness or other natural causes are not reportable.
- ▶ Immediate transport away from the scene for medical attention (one or more persons)
 - Each person is reported as an injury if they are immediately transported away from the scene for medical attention.
 - Illnesses requiring transport for medical attention are not reportable.
 - Transport can be by any means (i.e., Emergency Medical Services (EMS), Road Supervisor, etc.).

- ▶ Estimated property damage equal to or exceeding \$25,000, including all property involved, including damage to private vehicles, if applicable
- ▶ An evacuation for life safety reasons
 - A life safety event is one that presents an imminent danger to all people in or on transit property.

NTD Reportable Incidents include:

- ▶ **Collisions.** Must meet a reporting threshold as described above.
- ▶ **Fires.** Must meet a reporting threshold as described above.
- ▶ **Hazardous Material Spills.** Must meet a reporting threshold as described above and require specialized clean-up.
- ▶ **Acts of God.** Must meet a reporting threshold as described above.
- ▶ **System Security Events.** Must meet a reporting threshold as described above, including the following and other miscellaneous security incidents:
 - Suspicious Packages
 - Bomb Threat or Bombing
 - Chemical, Biological, Radiological, or Nuclear Release
 - Burglary
 - Vandalism
 - Hijacking
 - Arson
 - Sabotage
 - Cyber Security Events
- ▶ **Personal Security Events.** Must meet a reporting threshold as described above, including the following and other safety occurrences:
 - Homicide
 - Assault
 - Rape
 - Suicide or Attempted Suicide
 - Robbery
 - Larceny or Theft

MTM Transit also maintains accurate accident/incident data, including:

- ▶ Whether an accident was preventable or non-preventable
- ▶ Number, type, and severity of injuries
- ▶ Who was injured (i.e., passengers, employees, public, etc.)
- ▶ Damage estimates and final repair costs



▲ Notification Responsibilities

Once notified of an accident or incident, the MTM Transit local Dispatcher (or other applicable team member as designated by the contract) gathers as much information as possible regarding the event and immediately notifies applicable emergency response units such as Emergency Medical Services (EMS), State and/or local Police, Fire Department, and/or other emergency response agencies as necessary. The Dispatcher (or other applicable team member) also notifies the General Manager, Operations Manager, Safety Manager, Road Supervisor(s), and any other individuals as directed by the Operations Manager or General Manager. All local team members follow MTM Transit's Standard Operating Procedures (SOPs) for accident/incident reporting.

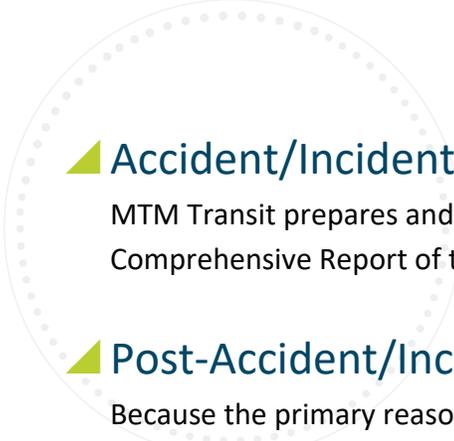
▲ Accident/Incident Investigation

MTM Transit thoroughly investigates all accidents, incidents, and near misses. We also maintain applicable records, including corrective action plans developed because of investigation findings. This may include working with local and/or State Police during an investigation. The degree of an investigation and the parties involved depend on the type and extent of the accident/incident.

MTM Transit encourages all employees to report near misses. The reporting of near misses by employees is non-punitive and is seen as a proactive way to prevent future accidents. In fact, we verbally recognize our employees for reporting near misses. MTM Transit is authorized to conduct the investigation of an accident or incident in the most expedient manner possible. This includes impounding, receiving, and examining evidence related to the accident/incident. MTM Transit also maintains the integrity of evidence and chain of custody. In fulfilling this responsibility, we may use secure facilities and assistance from the local and/or State Police forces. At no time does an investigation interfere with rescue operations.

MTM Transit strives to identify the causes and contributing factors to each accident/incident and takes immediate corrective actions to ensure the same or similar type of accident/incident does not occur. It is critical the accident/incident investigation process maintains a strong link to the hazard and risk identification and resolution process.

Hazards identified because of an investigation are evaluated according to the hazard identification and resolution process previously detailed in this SMS/ASP. Hazard resolutions are incorporated into procedures, designs, construction, modifications, and procurements to prevent further accidents/incidents of a similar nature.



▲ Accident/Incident Investigation Report

MTM Transit prepares and submits an Accident/Incident Report and, if required, a detailed Comprehensive Report of the accident/incident investigation.

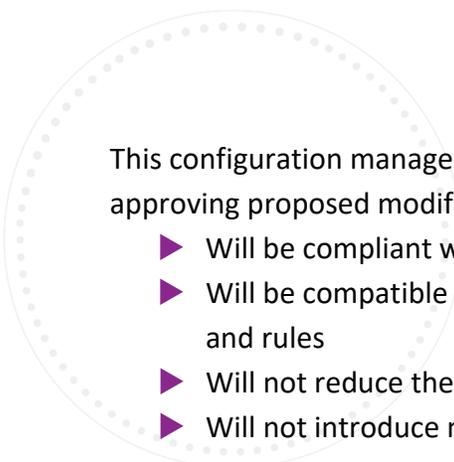
▲ Post-Accident/Incident Investigation Activities

Because the primary reason for conducting an accident/incident investigation is to determine accident/incident causes and to prevent reoccurrences, it is critical to ensure approved corrective actions are not only implemented, but also monitored to confirm and measure their effectiveness. All accident/incident information, including investigation reports, witness statements, photographs, corrective action plans, and disciplinary action taken against an operator or employee because of the accident/incident, are documented and maintained by MTM Transit. All accident/incident investigation findings including root causes and hazards identified during the investigation are linked, fully evaluated, and managed through our accident/incident reporting and investigation process.

Safety Validation of Change

Effectively evaluating and managing the impacts of changes on the transit system is essential to ensuring ongoing safety performance. MTM Transit has developed formal processes to identify and evaluate changes in the organization before they occur to ensure system safety is maintained. This includes ensuring all changes and modifications made to MTM Transit's client systems, operations, services, facilities, equipment, vehicles, and other properties, as well as changes made to policies, plans, rules, procedures, and other documentation that may impact or be affected by the SMS/ASP, are systematically planned for, evaluated, approved by appropriate parties, and documented.

This safety validation of change process, which is also referred to as our configuration management process, is designed to ensure operational compliance with approved technical criteria and requirements, as well as to evaluate and control safety risks. Configuration management of documents involves controlling changes and modifications made to documents including, but not limited to policies, procedures, guidelines, rulebooks, training materials, drawings, schematics, manuals, catalogues, bulletins, notices, general orders, pamphlets, information related to replacement parts and components, and/or other technical data. Configuration management of facilities, systems, vehicles, and equipment begins during development of the final design and extends through construction, start-up, and operations, concluding with deactivation of the facility, system, vehicle, and/or equipment.



This configuration management process establishes a method for formally reviewing and approving proposed modifications to ensure the modification:

- ▶ Will be compliant with applicable State, Federal, and local regulations
- ▶ Will be compatible with and consistent throughout all existing policies, procedures, and rules
- ▶ Will not reduce the safety and hazard controls already in place
- ▶ Will not introduce new hazards to the system

MTM Transit administers this process for all client operations and services. This includes creating and maintaining operating, maintenance, and training materials to support the operations and maintenance of our clients' operations, unless our client specifies different procedures.

▲ Configuration Management of Documents

It is the responsibility of all personnel whose duties entail the authoring and/or revising of documents affecting or affected by the Safety Program to thoroughly evaluate proposed changes to these documents, ensuring changes meet the requirements of the review process. If proposed changes do not meet one or more of the four requirements, they cannot be made.

Once a safety change has been thoroughly evaluated and made to a document, it is the responsibility of that document's authoring or controlling party to disseminate the revised document to all applicable personnel. It is also the responsibility of the authoring or controlling party to notify the applicable personnel at MTM Transit of what other documents have been changed or must now be revised because of the change or modification.

Configuration management activities as they pertain to the Safety Program have not been assigned to a specific department within MTM Transit but are instead carried out by each of the individual departments within MTM Transit and by the applicable management individuals responsible for and involved in the Safety Program. It is the responsibility of all personnel involved with a location's operations and services to not only implement the configuration management practices detailed by this SMS/ASP, but to maintain up-to-date files or document libraries of all the documents pertaining to the operation and services provided by MTM Transit pertaining to their location.

All personnel must remain cognizant and up to date regarding the rules, regulations, procedures, and/or policies related to their job responsibilities. MTM Transit maintains a central electronic and hard copy library of documentation for the company and at each corresponding location.



Rules and Procedures Reviews

To provide safe and reliable service to its customers, MTM Transit annually reviews and revises our operating and maintenance rules and procedures. We also review rules and procedures when accident/incident investigations determine the need for a change; in response to system modifications or changes including new system and/or equipment procurements; in response to changing Federal, State and/or local regulations and requirements; and/or because of findings generated through the ISA Program or audits performed by external agencies. We perform these reviews to ensure existing safety requirements are met; to verify proposed changes do not create new hazards or present additional risks to the system; to ensure the effectiveness of existing safety controls will not be reduced; and to ensure risks to personnel, passengers, subcontractors, equipment, facilities, and/or other properties or the environment will not be increased.

Rules and procedures subject to the review process include location operator training documents and SOPs; vehicle, system, and facility maintenance manuals and procedures; training materials and programs; People and Culture policies and procedures; and safety programs, plans, and procedures. As a national contract service provider based in St. Louis, Missouri, MTM Transit has established national procedures and adapted them to local conditions and requirements. MTM Transit's Chief Operating Officer, Regional Vice Presidents, Director of Safety Administration, and Regional Directors of Maintenance oversee this process, including how it is implemented for all locations. Disciplinary action is taken to ensure compliance with safety rules and procedures through our safety points policy detailed in our employee handbook.

Safety Certification

The FTA requires a formal Safety Certification Program be implemented for projects that receive funding from the FTA, which is applicable for many of our transit clients. Safety certification is a multi-phase process designed to verify all planned safety activities are completed and properly documented prior to beginning revenue operations or the start of services related to a contract acquisition, new service contract, or system modification; safety requirements included in contract specifications are properly interpreted, designed, and incorporated into the project; safety related plans, procedures, and training materials related to the project are reviewed for consistency and compatibility with upgrades, changes, or modifications made throughout the project; and new documentation is developed and approved prior to the start of revenue service.



The Safety Certification Process includes hazard identification, analysis, and mitigation across the functions of our operations, safety, and maintenance areas. This process ensures safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for new projects and major projects to extend, rehabilitate, or modify the existing system; taking over a new service contract; and replacing vehicles and equipment. This process also applies to all other projects determined by MTM Transit to be of sufficient significance requiring formal safety certification. MTM Transit has not needed to use this process up to the time of writing of this document.

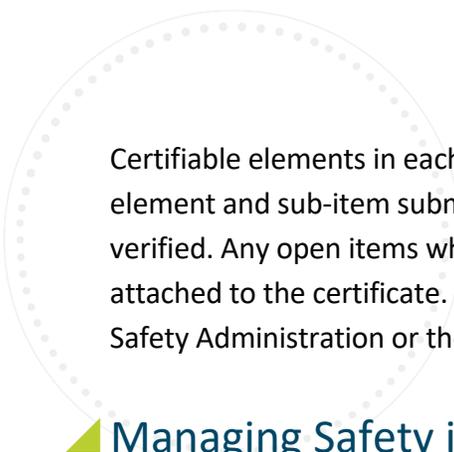
The Safety Certification Process begins with the identification of system safety requirements, including those detailed in technical specifications and design criteria applicable to the project. Hazard analyses, fault tree analyses, failure modes and effects analyses, and other safety and security assessment documents developed by MTM Transit and/or our subcontractors as part of the project are the primary means for determining implementation of safety design criteria. These analyses also verify safety requirements have been implemented; identified hazards, threats and vulnerabilities have been mitigated; and verification methods (i.e., inspections, analyses, tests, etc.) have been used to demonstrate compliance.

Certifiable elements are next identified and include all project elements which can affect the system safety of passengers, employees, clients, subcontractors, emergency responders, or the public. They can be broadly classified as:

- ▶ Facilities and Equipment
- ▶ Systems
- ▶ Integrated Test Requirements
- ▶ Operational Requirements

Completion of activities in these areas provides assurance through documented evidence the project conforms to all specified safety requirements. The certifiable elements for a project are defined by reviewing the project design criteria manual, project management Plan (PMP), and technical specifications, as well as past and similar projects.

The Safety Certification Process also includes the review of audits, inspections, and tests where the safety and security of customers and/or employees, equipment, or facilities could be affected by the improper or incorrect construction or manufacture of system elements. These audits, inspections, and tests cover facilities and system elements and may include inspections, qualification tests, performance tests, and acceptance tests. MTM Transit developed the tests to verify the integration and compatibility of equipment, facilities, and operation/maintenance procedures to function together under normal, abnormal, and emergency situations. This includes verifying the environmental constraints and capabilities of the system and facilities we will be providing to our clients.



Certifiable elements in each construction package are certified independently once all sub-element and sub-item submittals are received, reviewed, approved by the construction staff, and verified. Any open items which remain in effect with operational restrictions are documented and attached to the certificate. These restrictions must be resolved and approved by the Director of Safety Administration or the Chief Operating Officer and our respective client.

Managing Safety in System Modifications

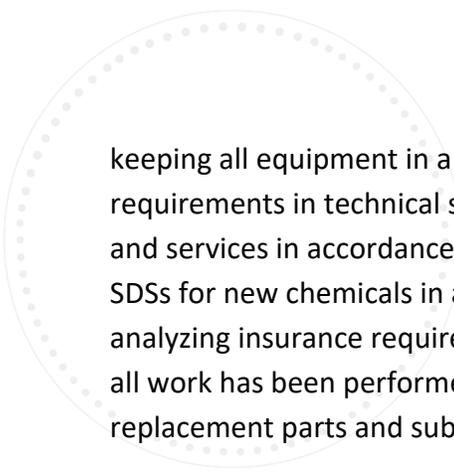
MTM Transit's processes for reviewing system changes and modifications as they pertain to each location have been developed to ensure proposed modifications and changes are compliant with all applicable State, Federal, and local regulations; are compatible with existing systems; will not reduce the safety and hazard controls already in place on the system; and will not introduce new hazards to the system. The review and approval process applies to:

- ▶ Changes in safety-critical processes or functions
- ▶ New construction projects or modifications to existing facilities, which are limited in scope and do not require formal safety and security certification
- ▶ Equipment acquisitions or modifications/overhauls of existing equipment
- ▶ Proposed system expansions including new routes or operating territories

The MTM Transit Director of Safety Administration approves the System Modification Review and Process, and it is carried out during each phase of the project, beginning with the preliminary review process. The Director of Safety Administration also ensures the proposed change or modification is evaluated by qualified personnel to determine its effect on MTM Transit's systems and the pertaining client operations. This requires reviewing applicable regulations, conducting site visits, reviewing specifications, and performing analyses, including preliminary hazard analyses and/or fault tree analyses. These types of analyses may require the efforts of multiple departments and personnel, or the outside support and expertise of subcontracted personnel. Once changes are complete, personnel in the area in which the change occurred are responsible for monitoring and evaluating the effects the modification has had on the system or operation. All system changes must be thoroughly documented.

Managing Safety in Procurement

The procurement and implementation of new services, equipment, and other materials directly impacts the safety of our operations and services. It is necessary to ensure the procurement process considers and evaluates safety risks prior to a new procurement being made. The procurement process attempts to ensure services, equipment, and other procured materials will not degrade the safety of any MTM Transit operations or services, ensuring commitment in



keeping all equipment in a state of good repair. These requirements are met by including safety requirements in technical specifications and contracts; evaluating impacts on our operations and services in accordance with the hazard identification and resolution process; requesting SDSs for new chemicals in accordance with the hazardous materials program; requesting and analyzing insurance requirements; requiring the submittal of certificates of compliance stating all work has been performed in compliance with the technical specifications; evaluating replacement parts and sub-components; and monitoring performance.

When procuring services, equipment, and other materials, MTM Transit's goal is to meet or exceed all Federal, State, and local requirements and keep our clients apprised of the process. Where required, MTM Transit also coordinates with the transit agency on adhering to the FTA Transit Asset Management (TAM) plan on managing capital assets.

For most MTM Transit locations, the client procures the vehicles and some of the durable maintenance equipment. MTM Transit is typically responsible for procuring road supervisor vehicles, uniforms, parts, fluids, and other materials to support operations and maintenance, as well as renting the maintenance facility and procuring the utilities for the facility. MTM Transit meets or exceeds client requirements related to the parts and fluids used on the vehicles to ensure equipment longevity. MTM Transit also typically procures the maintenance and scheduling software used in many of the transit systems we operate.

During emergencies, the procurement of services, equipment, and/or materials may be necessary to maintain safety, as well as MTM Transit's client operations and services. These situations are considered emergency conditions and as such special procedures are enacted to respond to and control the event. Examples of emergency conditions or events, which may require the emergency procurement of services, equipment, and/or materials, include severe weather conditions; emergency response and recovery activities related to accidents or incidents; equipment failures and malfunctions; employee strikes or work stoppages; or any other reason which may create an immediate threat to public health, welfare, or safety.

In all cases, the procurement process is conducted according to company policies and procedures and the Hazard Management Program as described in this document. All decisions regarding the procurement process are made with regards to safety and the effects and impacts the procurement will have on the safety of MTM Transit's operations and services. Every effort is made to ensure the procurement of new services and equipment will not diminish the effectiveness of current safety processes or hazard controls, nor create new or additional hazards within the system. All parties involved with or affected by the procurement are notified and continually informed regarding the procurement.

Maintenance and Inspection Programs for Vehicles, Systems, and Infrastructure

Maintenance and inspection programs are necessary to maintain MTM Transit's vehicles, equipment, systems, and infrastructure in a state of good repair. Failure to administer such programs could result not only in a degradation of service, but a degradation of safety. MTM Transit monitors and audits maintenance and inspection programs to measure safety program performance and ensure system safety is maintained. MTM Transit has a robust maintenance program and adheres to all scheduled maintenance timelines.

MTM Transit is usually responsible for maintaining vehicles, maintenance equipment, and the maintenance facilities of our contracted services. Our maintenance program is based on preventative maintenance, non-scheduled maintenance, and campaigns to improve fleet safety and reliability. This includes client operations, rolling stock, communications systems, equipment, and facilities. All maintenance work is performed according to MTM Transit's applicable preventative maintenance schedules, procedures, and/or manufacturer recommendations.

Maintenance and inspections are also conducted because of accidents/incidents; employee or passenger complaints or notifications; warranty work; and/or safety analyses and hazard reports. Maintenance procedures are maintained in our maintenance facilities. The following summarizes key standards and procedures related to MTM Transit's maintenance safety compliance assessment and inspection processes:



- ▶ **Pre-trip Inspections.** All vehicle operators perform pre-trip inspections of their vehicles prior to entering revenue service. All vehicle defects identified by the operator are noted on the applicable pre-trip inspection form and reported to maintenance personnel. If a vehicle has a defect or is damaged to the extent the operator feels it is unsafe for service, they notify the Dispatch and maintenance teams so the vehicle can be repaired or replaced. If vehicles are safe for service, they are operated, and all non-safety or security related defects are corrected as soon as possible. Maintenance personnel maintain a record of all operator defect reports using the Driver Vehicle Inspection Report (DVIR) books, which are maintained for each vehicle.

- ▶ **Vehicle Accident/Incident Repairs.** All accidents and incidents involving vehicles are reported to the Dispatch team immediately. Vehicles damaged because of an accident/incident are removed from revenue service, evaluated by maintenance personnel, and repaired as soon as possible, depending upon the degree of damage.
- ▶ **Preventative Maintenance.** Scheduled maintenance activities include, but may not be limited to, preventative maintenance programs tied to vehicle mileage, manufacturer recommendations, or industry standards. MTM Transit has established preventative maintenance programs for all vehicles, as well as programs to identify and eliminate potential problems prior to the need for performing corrective maintenance, which can often be much more costly.

Maintenance Supervisors monitor maintenance activities and ensure required inspections and repairs are conducted according to schedules and procedures. Maintenance Supervisors also ensure all repairs are made and documented according to local, State, and Federal regulations. In addition, MTM Transit's operations, maintenance, and safety staff perform daily facility and equipment inspections as part of their normal duties to ensure the system remains safe and reliable. The General Manager also conducts monthly inspections of the maintenance facility. Stations and stops owned and operated by outside parties are maintained by their respective owners.

The General Manager and applicable members of each local management team perform detailed facility and equipment inspections of our property, as well as review inspection procedures, checklists, findings, and corrective actions developed and implemented. MTM Transit inspects preventative maintenance records to identify hazards and verify the accuracy of inspections, testing data, and methods. Audits and inspections may include interviews with MTM Transit employees, reviews of procedures and records, first-hand observations of operating and maintenance activities, and visual examinations and measurements of vehicles, systems, and equipment.



General Managers and Supervisors immediately notify their location's employees of any hazard identified in the workplace and of action to take to eliminate and/or control the hazard. It is the responsibility of the MTM Transit department in which the hazard was identified to notify all

other MTM Transit departments and personnel who may be affected by or exposed to the hazard. It is also the responsibility of the MTM Transit department in which the inspection took place to implement and monitor the success of proposed recommendations and corrective actions, as well as to follow the Hazard Management Program as required by this SMS/ASP.

Inspection results, reports, recommendations, corrective actions, and follow-up activities taken because of the inspection are documented and maintained in the Hazard Identification Program Log. Work orders are generated to resolve identified issues, and the responsible maintenance divisions or subcontractors are notified.

The maintenance and inspection program functions as a component of the ISA Program and is directly linked to the Hazard Management Program. All findings are documented, evaluated, and prioritized for closure in accordance with the Hazard Management Program. Written checklists may be used to support the inspection process. Written reports are prepared detailing inspection findings, corrective actions, responsible parties for implementing the corrective actions, and estimated closure dates. Follow-up inspections are conducted to ensure action was taken.

Emergency Planning and Response

Effective emergency preparedness, response, coordination, and training are essential elements to minimizing losses during accidents/incidents or the occurrence of an emergency or disastrous event. The objective of emergency preparedness and planning is to ensure fast and efficient response to emergencies to minimize risk to the safety and health of passengers, employees, and emergency response personnel, and to avoid unnecessary property loss. To meet this objective, MTM Transit has a written comprehensive Emergency Response Plan (ERP), which establishes the roles and responsibilities to be carried out by our locations and by various emergency response agencies during emergencies. The ERP is supplemented by emergency operating rules. These documents can be referenced to gain a complete understanding of the responsibilities and policies regarding emergency preparedness, response, coordination, and training. During emergencies, it is MTM Transit's policy to:

- ▶ Provide the most effective and timely response to any emergency or disaster, ensuring the safety of the public, passengers, and employees
- ▶ Provide for the immediate needs of individuals involved in the emergency, ensuring all passengers, bystanders, and employees receive care and treatment
- ▶ Ensure the highest practical level of service for all passengers is maintained by providing alternate or temporary service while striving to restore normal service and equipment in line with Emergency Support Function 1 – Transportation

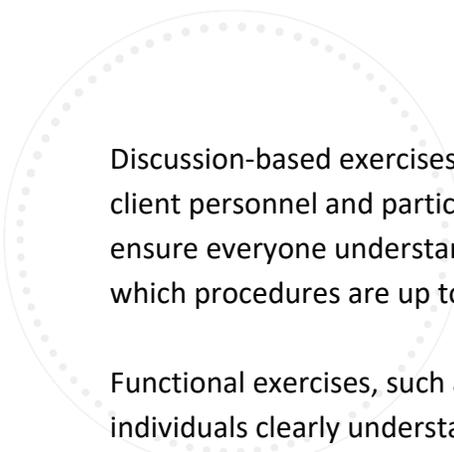
- ▶ Coordinate with Federal, State, and local authorities to make available additional or alternative transit service as deemed necessary to support response efforts of these authorities
 - This response is consistent with the federally initiated National Incident Management System (NIMS) and Incident Command System (ICS) adopted by Federal, State, and local agencies.
- ▶ Ensure customers, the public, and the media are presented with timely, accurate, and easily understandable information regarding service changes, disruptions, and/or re-routing
- ▶ Ensure protection and preservation of MTM Transit and client assets
- ▶ Coordinate debris removal and clean-up activities with local, State, and Federal agencies
 - The Environmental Protection Agency (EPA) is contacted for accidents/incidents resulting in environmental impacts.
- ▶ Conduct accident/incident damage assessments to determine the resources necessary for recovery and the services which can be restored
- ▶ Assist in any subsequent accident/incident investigation process conducted by Federal, State, or local authorities or agencies with regulatory authority including the NTSB, FTA, Transportation Security Administration (TSA), Federal Bureau of Investigation (FBI), and/or other agencies
- ▶ Document and maintain records of all disasters and emergencies

Through our clients, administrative authority is given for the provision of transit and commuter transportation services, for the implementation of safety, security, and emergency preparedness requirements. This includes internal mobilization of personnel, resources, and additional services as deemed necessary by our clients or as directed by emergency responders and law enforcement agencies.

During an emergency or disaster involving personnel and/or passengers, all personnel located at the scene of the emergency are under the authority of the Incident Commander (Fire, Police, etc.) and then under the authority of the MTM Transit Operations Manager or Road Supervisor. These authorities will manage the incident consistent with NIMS and ICS.

▲ Preparedness

MTM Transit prepares for emergencies and disasters by training personnel and conducting tabletop and functional exercises, emergency drills, and individual unit drills, depending on each client's requirements. Emergency drills demonstrate personnel understand and can carry out their individual roles and responsibilities during an emergency and are familiar with the requirements, equipment, and layout.



Discussion-based exercises such as tabletop drills are conducted to prepare MTM Transit and client personnel and participating agencies for emergencies. The purpose of these drills is to ensure everyone understands their roles and responsibilities during an emergency and to check which procedures are up to date with accurate information.

Functional exercises, such as full-scale exercises and emergency drills, are conducted to ensure individuals clearly understand the steps they must perform during an emergency. Typical drills include operators assisting passengers in deboarding; crowd control during an emergency; and Dispatcher personnel responding to operator-initiated emergency call-ins. These drills may also include personnel from external law enforcement agencies.

▲ Response

The response phase of emergency management puts the planned emergency activities, responsibilities, and agreements into effect. The emergency preparedness planning (EPP), Emergency Operations Plans (EOPs), SOPs, and interagency agreements in place have been written to ensure when an emergency or disaster occurs, MTM Transit management personnel and first response agencies and organizations can break down their areas of responsibility into manageable units, assess what has happened, what can be done, and what is needed. Response efforts focus on the preservation of lives concurrent with incident stabilization activities. These activities are conducted consistent with NIMS and ICS, and often require teamwork with other State and local emergency response agencies.

▲ Recovery

The recovery phase of emergency management includes the restoration of normal services/conditions and the assessment and documentation of emergency response operations. Depending on the nature and severity of the event and its aftermath, restoration of normal services and conditions depends upon other recovery activities.

▲ Notification

It is the responsibility of MTM Transit personnel and our clients to understand the requirements for proper notification when an emergency or disaster occurs involving the service we provide. To minimize and control the threat to health, life, and property, all appropriate parties are notified as quickly as possible to ensure a timely response to the disaster or emergency.



▲ Interagency Agreement

Interagency or inter-department agreements may be necessary to ensure all parts of our organization understand their roles and responsibilities during disasters and emergencies. These agreements identify the roles and responsibilities of each organization, the chain of authority, and necessary contact information.

▲ Training of Personnel

Emergency Management Training is conducted through training drills and tabletop exercises. Emergency response procedures are distributed to MTM Transit location personnel and other stakeholders as part of the training program and by MTM Transit departmental supervision based on the employee's scope of responsibility.

Environmental Management Program

Improper labeling, storage, and handling of hazardous materials can result in consequences which endanger the lives of employees, subcontractors, passengers, and the public, but also endanger our facilities, properties, equipment, systems, operations, surrounding public properties, and the environment. An effective environmental management program addressing the procurement, use, and disposal of hazardous materials is essential to eliminating or reducing these consequences. All activities involving hazardous materials comply with applicable Federal, State, and local environmental protection laws and regulations, including those of the Clean Water Act, Clean Air Act, Resource Conservation and Recovery Act, and Comprehensive Environmental Response and Compensation and Liability Act.

MTM Transit has established procedures pertaining to the disposal of hazardous materials and wastes related to hazardous material spills and/or releases. These procedures define personnel and department responsibilities when responding to emergency events involving hazardous materials and wastes, as well as responsibilities for the accumulation, recycling, and disposal of these materials. Appropriate procedures are followed when handling contaminated liquid waste; spent engine fluids such as engine oil, transmission fluid, hydraulic fluid, and antifreeze; caustic waste; non-hazardous liquid waste; spent oil filters; fluorescent light tubes and batteries; and scrap tires.

Safety Promotion



To promote safety, MTM Transit provides employees with **formal safety training, a formal means of communicating safety information, and a means for employees to report safety concerns.**

MTM Transit communicates safety information to employees through our MTM Transit Employee Handbook; Injury and Illness Prevention Plan (IIPP); and in this SMS/ASP. The purpose of these documents is to confirm employees are aware of SMS/ASP requirements, to ensure appropriate personnel in the organization convey safety critical information to all employees, and to explain why safety actions are taken and procedures are introduced or changed. Under our Safety Program, communication with employees is made through daily safety messages posted on employee bulletin boards and radio announcements, as well as monthly safety meetings, trainings, and day-to-day operations.

SMS/ASP Training and Implementation Tasks and Activities

All MTM Transit employees have roles and responsibilities under the Safety Management System (SMS). As required by the Safety Policy established by this SMS/ASP, which has been approved and adopted by our CEO, all employees are responsible and accountable for fulfilling and complying with the safety requirements of their positions, for supporting the implementation of the SMS/ASP, for receiving supplemental training, and for providing support necessary to achieve program goals.

The lines of authority for implementing the SMS/ASP begin with each location's management staff, who are supported by executive management, and empowered and authorized to design, implement, train, and administer a comprehensive, integrated SMS/ASP to support our transit operations and services.

The General Manager at each location identifies and addresses safety concerns; tracks and verifies implementation of recommendations and corrective actions; and reports the status of our SMS/ASP to the MTM Transit Executive Safety Committee and the Director of Safety Administration. Each General Manager, serving as the SMS/ASP Manager for their location, is authorized to lead the development, implementation, training, and maintenance of any other plans, policies, procedures, and processes to support and implement the SMS/ASP.

The matrix below depicts the roles and responsibilities of MTM Transit personnel and other stakeholders as they pertain to our Safety Program. As used in the matrix, the following notations are defined as:

- ▶ **P – Primary Task Responsibility.** The identified participant is responsible for the preparation of the specified documentation.
- ▶ **S – Secondary or Support Responsibility.** The identified participant is to provide the necessary support to accomplish and document the task or requirement.
- ▶ **R – Review/Comment Responsibility.** The identified participant may review and provide comment on the task or requirement.
- ▶ **A – Approval Responsibility.** The identified participant is to review, comment, and subsequently approve the task or requirement.

Safety Tasks/Responsibilities Matrix

Task/Activity	Executive Team	Dir. of Safety Admin.	General Manager	Safety Manager	Maintenance Mgr.	Safety Committee	Operations	Maintenance
Management Commitment/Policy	A	P	S	S	S	P	S	S
Summary Section	A	S	P	S	S	R	S	S
Authority	A	P	P	P	P	R	S	S
Purpose	A	S	P	S	S	R	S	S
Goals and Objectives	A	P	P	P	P	S	S	S
Scope	A	P	P	P	P	S	S	S
SMS/ASP Control and Revisions	A	S	P	S	S	R	R	R
Operations and Maintenance Safety	A	S	P	S	S	P	P	P
Maintenance of Equipment	A	S	P	S	S	P	P	P
Facilities and Systems Description	A	R	P	R	R	R	R	R
Organizational Structure	A	P	S	S	S	R	R	R
Inter-Company Coordination	A	P	P	P	P	R	R	R
Safety Committee	A	S	P	S	S	P	P	P
Hazard Management (ID, Analysis, and Resolution)	A	S	P	S	S	P	P	P
Equipment and System Design	A	S	P	S	S	R	R	R
Safety Certification Program	A	S	P	S	S	S	S	S
Configuration Management	A	P	P	P	P	P	P	P
Accident/Incident Investigation	A	S	P	S	S	P	P	P

Safety Tasks/Responsibilities Matrix

Task/Activity	Executive Team	Dir. of Safety Admin.	General Manager	Safety Manager	Maintenance Mgr.	Safety Committee	Operations	Maintenance
Safety Inspections	A	S	P	S	S	P	P	P
Facilities Inspections	A	S	P	S	S	P	P	P
Equipment Inspections	A	S	P	S	S	P	P	P
Operations Safety	A	S	P	S	S	P	P	P
Emergency Operations Response Procedures	A	P	S	S	S	P	P	P
Emergency Exercises and Drills	A	S	P	S	S	P	P	P
Operational Documents	A	S	S	S	S	P	P	P
Rules and Procedures Review	A	S	S	S	S	P	P	P
Occupational Safety and Health Program	A	S	S	S	S	P	S	S
Industrial Hygiene Program (if applicable)	A	P	S	S	S	P	S	S
Hazardous Materials Program	A	S	S	S	S	P	S	S
Personal Protective Equipment Program	A	S	S	S	S	P	S	S
Subcontractor Safety Program (if applicable)	A	P	P	S	S	P	S	S
Safety Data Acquisition, Analysis, and Reporting	A	P	P	S	S	P	P	P
Reports	A	P	P	S	S	S	S	S
Training	A	P	P	S	S	P	P	P
Environmental Protection Program	A	P	S	S	S	P	P	P
Internal Safety Review Program	A	P	P	S	S	P	S	S
Drug and Alcohol Abuse Program/Policy	A	P	S	S	S	P	P	P
Internal Audits	A	P	S	S	S	S	S	S

Index of Supporting Documents

The following documents support the implementation of the SMS/ASP for MTM Transit:

- ▶ MTM Transit Hazard Identification Reporting Form
- ▶ MTM Transit Hazard Identification Log
- ▶ MTM Transit Injury and Illness Prevention Plan (IIPP)
- ▶ MTM Transit Employee Handbook
- ▶ MTM Transit Employee Safety Manual



▲ Safety Communication and Outreach

MTM Transit's primary means of communicating safety information to employees, passengers, and the public is through Safety Messages and Safety Alerts sent via email and correspondence through Workday, our internal employee People and Culture system, as well as through location messages. MTM Transit communicates safety information to our employees by posting safety notices and bulletins to employee bulletin boards, through regular radio announcements, monthly Safety Committee Meetings, day-to-day management oversight, and through MTM Transit's employee training program. MTM Transit has established a comprehensive Injury and Illness Prevention Program (IIPP) and this SMS/ASP detailing the company's processes and requirements for maintaining workplace safety and security, including Occupational Safety and Health Administration (OSHA) program requirements. This is also covered in our MTM Transit Employee Safety Manual.

▲ Workplace Safety Program

To meet contractual and State requirements where we operate, MTM Transit has implemented a thorough pre-hire employee screening program to ensure only qualified applicants are hired. In addition, MTM Transit has established training programs providing in-class activities, curriculums, manuals, lesson plans, field exercises, drills, computer-based training, written and video communications, and testing for vehicle operators, maintenance personnel, and front-line employees. We developed our training programs to address safety topics and concerns, which employees may face during their daily duties.

Categories of safety-related work which require training and certification include:

- ▶ New Employee Orientation and Training Programs, emphasizing:
 - Hazard Communications Training
 - Personal Protective Equipment (PPE) Training
 - Bloodborne Pathogens
 - Drug and Alcohol Abuse Policy
 - Hazard Identification and Resolution Training
 - SMS/ASP Training
 - State or Federally Mandated Training
 - Injury and Illness Prevention Training
 - First Aid and CPR Training
 - ADA Laws and Regulations Compliance
 - Ergonomics Training
 - Accident/Incident/Near Miss Reporting

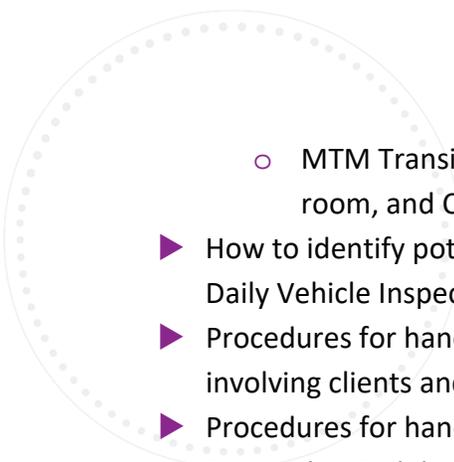
- 
- ▶ Operator Training and Certification
 - Transit and Paratransit Company (TAPTCO) Operator Training Program, which includes contract specific Operator Rules and Procedures and Supervisor Training
 - ▶ Maintenance Training, including Vehicle Maintenance
 - ▶ Facility, Systems, and Equipment Maintenance
 - ▶ Safety Rules and Compliance Program
 - ▶ Security and Emergency Preparedness, which includes contract specific Emergency Operating Procedure Training and Emergency Response Training, as well as National Incident Management System (NIMS) and Incident Command System (ICS) training

The training programs received by an employee depend on their job classification and responsibilities. The training programs include on-the-job training monitored by a Supervisor or mentor. Training efforts begin at the initial stages of employment and are continued periodically throughout an employee's career to maintain certifications and ensure the employee can perform their duties in a safe and efficient manner.

Employee Safety Training

A comprehensive employee/operator training program is essential to the successful operation of our clients' services. Training programs developed by MTM Transit and associated subcontractors are used as the core training materials for our staff. Safety policies are covered in the TAPTCO operator training materials and our employee handbook, which are issued to all perspective operators as part of the training process. Documentation verifying each operator has received the training outlined in our program is retained and verified. All employees working in safety sensitive positions receive, at a minimum, instruction in the following areas:

- ▶ Requirements of MTM Transit's SMS/ASP and the four Federal Transit Administration (FTA) "Moving Ahead for Progress in the 21st Century" (MAP-21) Public Transportation Agency Safety Plan (PTASP) elements as it relates to transit employees
- ▶ Requirements of all Federal, State, and local law, codes, ordinances, and regulations as it relates to their positions
- ▶ Safe operation of in-service vehicles and associated equipment, including our Defensive Driving Course and On-Road Training and Wheelchair Lift Operation Training (to include operation of the lift if applicable)
 - MTM Transit's New Operator Training Program from TAPTCO includes 96 hours of minimum instruction with a minimum of 56 hours of training instruction in vehicles. This minimum hour threshold for instruction can be increased upon client request.

- 
- MTM Transit teaches defensive driving using the Look ahead, Look around, Leave room, and Communicate (LLLC) method.
 - ▶ How to identify potential vehicle hazards through pre-operational and post-operational Daily Vehicle Inspections
 - ▶ Procedures for handling and reporting in-service vehicle accidents and incidents involving clients and the public
 - ▶ Procedures for handling and reporting roadside emergencies including Emergency Evacuation Training
 - ▶ Proper documentation of activity within the system
 - ▶ Passenger Assistance, Safety, and Sensitivity (PASS) Training concepts
 - ▶ Bloodborne Pathogen Training
 - ▶ Lockout Tagout Training
 - ▶ Hazard Communications Training
 - ▶ Ergonomics Training
 - ▶ Emergency Response and Emergency Preparedness Training
 - ▶ Emergency Response drills and simulations in conjunction with our clients and local emergency responders, as applicable
 - ▶ Security Awareness Training from the National Transit Institute (NTI)

Management team members are trained on managing the MTM Transit SMS and implementing locally to their facility. This training is conducted and documented annually and retained locally in the location's training files.

Training is conducted through a combination of classroom and practical testing by a qualified instructor who evaluates students' competencies. Upon completion of all training requirements, each prospective employee's qualifications are evaluated and certified by the local Safety Manager or Safety Supervisor, prior to their first assignment operating in the system. A current copy of all certifications for instructors and operators is maintained by MTM Transit, as well as each individual service provider, and available for audit upon request.

MTM Transit conducts scheduled refresher training to review all subjects covered in the initial training, as well as how to continually avoid unsafe situations or practices. A Training Attendance Report on all refresher or remedial training provided to safety sensitive employees is documented.

Drug and Alcohol Program

MTM Transit has a zero-tolerance policy for drugs and alcohol. The company's program has been reviewed and approved by the FTA and is administered by a third party, Foley. As required by federal guidelines, MTM Transit's drug and alcohol testing policy is compliant with 49 CFR Part 40 and 655 as amended, and the Federal Drug Free Workplace Act. It also:

- ▶ Defines the responsibilities of personnel
- ▶ Identifies the circumstances under which an employee may be tested for alcohol and/or drugs
- ▶ Includes the dangerous effects of controlled substances and the consequences of violating the policy
- ▶ Informs employees of the education and treatment program (rehabilitation program), which is available to employees requiring treatment or those who seek treatment voluntarily
- ▶ Requires all safety sensitive employees submit to random drug and alcohol testing
- ▶ Requires all safety sensitive employees who have been absent from work for more than 90 calendar days submit to a drug and alcohol test and have a verified negative drug test result before returning to safety sensitive functions
- ▶ Requires all safety sensitive employees submit to drug and alcohol testing after being involved in an accident or incident which meets the FTA threshold for post-accident testing
 - Supervisors trained in post-accident procedures determine if an employee must submit to a post-accident drug and alcohol test.

MTM Transit's zero-tolerance Drug and Alcohol Policy is available to all employees via the company intranet site or by contacting any Supervisor, Manager, or the People and Culture Department.

Hazardous Materials and Communication Program

Proper labeling, storage, and handling of hazardous materials is critical to maintaining safety throughout MTM Transit's operations and services. Materials not labeled properly have the potential of being used and stored in combination with other incompatible materials, the results of which can be catastrophic. MTM Transit administers a hazardous materials program which applies to all employees and departments that buy, store, handle, and/or use hazardous materials.



MTM Transit is responsible under the hazardous materials program to remain cognizant of the hazards and precautions associated with the hazardous materials bought, stored, handled, and/or used in the operation and maintenance of our services. Fulfillment of this responsibility is accomplished through:

- ▶ Training programs
- ▶ Review and distribution of Safety Data Sheets (SDSs)
- ▶ Review of container labeling
- ▶ Development of specification and procurement requirements
- ▶ Development of hazardous substance lists

MTM Transit is also required to have and properly administer a procedure for reporting hazardous material accidents and incidents. MTM Transit ensures all personnel are informed regarding the hazards they may encounter in their work areas prior to the start of their initial assignments. These hazards include those presented by hazardous materials and substances. MTM Transit's department Managers and Supervisors determine the training requirements necessary to ensure employees can perform their duties in a safe and efficient manner. This training includes a discussion of the hazards presented by hazardous materials and substances, as well as the precautions and controls which must be taken or implemented to ensure safety when buying, storing, handling, and/or using the materials. Training is also provided to personnel who perform work on pipes and vessels, as well as to employees who perform hazardous or non-routine tasks, such as performing confined space entries. To facilitate the identification of training needs, site-specific hazardous substance lists are developed and maintained to track the quantities and locations of hazardous substances within the department.

MTM Transit maintains a formal process for reviewing and approving all chemicals and hazardous materials maintained by a department in which the material is stored, handled, or used, prior to their purchase. SDSs for all chemicals and hazardous materials are easily accessible to all employees and work areas.

Infectious Disease Exposure

MTM Transit continuously monitors and adopts guidelines and control measures recommended by the Center for Disease Control and Prevention, as well as local or State Departments of Health to minimize exposure to infectious diseases.

SMS/ASP Review and Modification

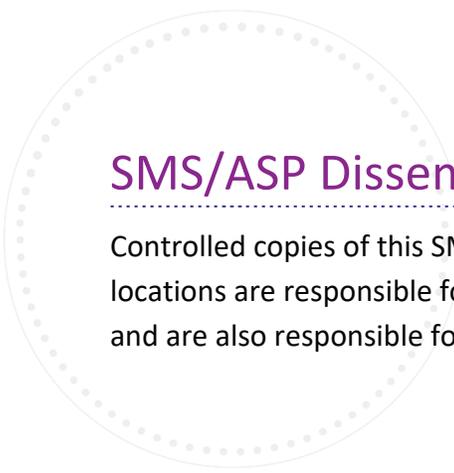
As MTM Transit's operations and services expand and change, so do the safety requirements associated with these operations and services. This SMS/ASP is considered a living document that is reviewed and updated annually to ensure it remains up-to-date and consistent with our operating, maintenance, management, and administrative rules, procedures, policies, and documents. This SMS/ASP is also reviewed to evaluate all tasks and identify new tasks that may be required as MTM Transit operations and services improve and expand; to refine and improve tasks, descriptions, and activities as necessary; and to identify those responsible for accomplishing newly added safety-related tasks and responsibilities.

This SMS/ASP is influenced through input received from employees, subcontractors, passengers, the public, emergency response agencies, and other State, Federal, and local regulatory agencies. Feedback is both welcomed and encouraged.

The Executive Safety Committee is ultimately responsible for initiating, developing, issuing changes, and gaining all approvals for this SMS/ASP. However, other stakeholders such as the MTM Transit Executive Team may recommend changes at any time. Personnel, including MTM Transit employees, may submit proposed changes to their respective Managers and Supervisors or directly to the Director of Safety Administration. If the Executive Safety Committee agrees the change is warranted, the change is incorporated into the annual review and revision cycle.

Safety Committees Used to Update Plans

For Small Urbanized Areas (population with fewer than 200,000 people), a transit agency must develop and update its SMS/ASP in partnership with front-line employee representatives. For Large Urbanized Areas (population with greater than 200,000 people), a transit agency in receipt of 5307 funding and serving a large, urbanized area must have a safety committee that is compliant with 49 U.S.C § 5329(d)(5). Any updates to the plan require partnership with the established Safety Committee. MTM Transit meets these safety committee requirements for each transit agency we operate; safety committees are used to update plans as necessary and/or when required.



SMS/ASP Dissemination

Controlled copies of this SMS/ASP are disseminated to each MTM Transit location. The locations are responsible for reviewing and ensuring they possess the most current SMS/ASP and are also responsible for disseminating the SMS/ASP to their employees.

Glossary

Accountability	What an individual is required to achieve, directly or through those to whom the individual has delegated responsibility, regarding the operation of the Safety Management System (SMS)
Accountable Executive	An individual identified within the organization with ultimate responsibility and accountability for the implementation and maintenance of the organization’s Safety Management System (SMS)
Corrective Action Plan	A plan developed to describe the actions to minimize control, correct, or eliminate hazards, which identifies the schedule and responsible parties for implementing these actions
Hazard	Any condition or set of conditions, internal or external to the system or system operation which, when activated, can cause injury, illness, death, or damage, including loss of equipment or property, or severe environmental damage
Hazard Analysis	Formal activities performed to analyze potential consequences of hazards during operations related to provision of services.
Hazard Identification	Formal activities performed to identify hazards during operations related to provision of services
ISA	Internal Safety Audit or Safety Audit
Location	Each MTM Transit site or division providing service operations (We use this term and the term “division” to describe each of our MTM Transit locations.)
Management System	An organizational structure and resources supporting data-based, strategic decision making by an organization’s senior management
Passenger	A person who is on board, boarding, or alighting from a transit vehicle for the purpose of travel
Public Transportation Agency Safety Plan (PTASP)	Rule that requires certain operators of public transportation systems that receive federal funds under the FTA Urbanized Area Formula Grants to develop an Agency Safety Plan (ASP) that includes the processes and procedures to implement a Safety Management System (SMS), a comprehensive, collaborative approach to managing safety.
Responsibility	Functions and duties describing the purpose of what an individual is required to do, regarding the operation of the Safety Management System (SMS)



Risk Control

Activities and resources to reduce or eliminate the effects of hazards

Safety

The state in which the potential of harm to persons or property damage during operations related to provision of services is reduced to and maintained at an acceptable level through a continuing process of hazard identification and safety risk management (also referred to as meaning “freedom from risk”)

Safety Assurance

Processes within the SMS/ASP which function systematically to ensure the performance and effectiveness of safety risk controls and that the organization meets or exceeds its safety objectives through the collection, analysis, and assessment of information

Safety Culture Process

A company safety program and safety process consisting of four key SMS/ASP elements from the Federal Transit Administration (FTA) helping ensure the company maintains a safe organization, protecting its employees and customers who use our services

Safety Deficiency

A condition that is a source of hazards and/or allows the perpetuation of hazards in time

Safety Management System (SMS)

The formal, top-down, organization-wide approach to managing safety risk and ensuring the effectiveness of safety risk controls; includes systematic procedures, practices, and policies for the management of safety risk

Safety Objective

A high-level, global, generic, and non-quantifiable statement regarding conceptual safety achievements sought to be accomplished by an organization regarding its safety performance

Safety Performance

An organization’s safety effectiveness and efficiency, as defined by safety performance indicators and safety performance targets, measured against the organization's safety objectives

Safety Performance Indicator

A data-based, quantifiable parameter used for monitoring and assessing safety performance

Safety Performance Monitoring

Activities aimed at the quantification of an organization’s safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets

Safety Performance Target

A planned or intended, quantifiable improvement for safety performance indicator over a given period

Safety Policy

The public transportation system’s documented commitment to safety, which defines its safety objectives and the accountabilities and responsibilities of its employees regarding safety

Safety Promotion

A combination of training and communication of safety information to support the implementation and operation of the SMS/ASP in the organization

Safety Risk

The assessment, expressed in terms of predicted probability and severity, of the consequences of a hazard taking as reference the worst foreseeable, but credible, situation

Safety Risk Evaluation

Refers to formal activities performed to determine safety risk probability and severity characteristics, such as the probability and severity of potential consequences of hazards, and to assess the tolerability of such consequences

Safety Risk Management

A process within the SMS/ASP composed of describing the system, identifying the hazards, and analyzing, assessing, and controlling risk

Safety Risk Mitigation

Formal activities to control the probability and/or severity of the potential consequences of hazards during operations related to provision of services

Safety Risk Probability

The likelihood a consequence might occur, taking as reference the worst foreseeable, but credible, condition

Safety Risk Severity

The anticipated effects of a consequence, should it materialize, taking as reference the worst foreseeable, but credible, condition

System Safety

The application of operating technical and management techniques and principles to the safety aspects of a system throughout its life to reduce hazards to the lowest practical level through the most effective use of available resources

Appendix A: State/Local Specific Addendums, Attachments, and/or Plans

This area is reserved for State or local specific addendums, attachments, plans, etc. For example, MTM Transit's SMS/ASP for Florida clients will include the State of Florida Minimum Safety, Operational, and Maintenance Requirements as required by the FL FAC 14.90 Rule. In this example, this Appendix will include a copy of MTM Transit's compliant Florida System Safety Program Plan (SSPP), broken down by category requirement. As a further example, if MTM Transit has a contract in Florida for 5310 only, in this Appendix we will include what is required from the State Management Plan (SMP), such as a Transportation Operational Procedure (TOP).

Please note that State requirements do not conflict with parts of MTM Transit's PTASP for each State. As needed, we will include any State requirements in the applicable PTASP sections as applicable.



System Safety Program Plan (SSPP)

Prepared for
City of Manteca, California



2023



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Section 1 – Introduction

Executive Policy Statement

MTM Transit is committed to providing safe, efficient, and courteous service to our customers. To achieve the safest operating environment, MTM Transit establishes and maintains a safety policy stressing the importance of safety awareness throughout the organization. Our safety policy is presented in this System Safety Program Plan (SSPP).

Authority

I, Alaina Maciá, President and CEO, certify that this SSPP for MTM Transit will always be followed and fully enforced. I certify that all MTM Transit staff are fully aware of their responsibilities and their importance.



Alaina Maciá, President and CEO



July 1, 2023

Date

Scope

MTM Transit's SSPP emphasizes that every employee is responsible for ensuring the safety of customers, employees, the public, contractors, and MTM Transit's property and fleet. The MTM Transit safety policy presented in this SSPP applies to all employees and to all MTM Transit vehicle activities, including but not limited to all operations; maintenance and support activities; and the design, construction, procurement, installation, and testing of equipment and facilities. MTM Transit's SSPP includes, but is not limited to, missions, responsibilities, rules, and procedures for a coordinated and comprehensive variety of safety programs developed to secure a systematic approach to transportation safety. Our SSPP also ensures all MTM Transit's safety responsibilities and tasks are documented in a logical and organized manner, and that programs are consistent with safety programs of transportation operators throughout the State of California.

Goals and Policies

MTM Transit's management is fully committed to developing, implementing, and updating clearly defined SSPP safety goals. SSPP safety goals provide direction to improve public safety by attaining a safe operating environment and reducing the number, rate, and severity of



potential vehicle accidents. Our SSPP also provides procedures to measure the success of meeting established goals.

Safety goals are updated annually or as required based on system changes. All employees are actively encouraged to participate in developing and updating goals by presenting suggestions to the President/CEO and/or her designated representatives. The President/CEO has final approval of SSPP safety goals.

MTM Transit's safety goals include, but are not limited to, the following:

- ▶ Reducing the number, rate, and severity of potential vehicle accidents
- ▶ Attaining the safest possible operating environment
- ▶ Providing effective maintenance and preventative maintenance for all MTM Transit property in a timely manner
- ▶ Assigning each employee with responsibility for performing job functions in the safest possible manner
- ▶ Clearly defining employee safety roles and responsibilities
- ▶ Continuously improving the skills and knowledge of all employees involved with the safety of the system through training and other means
- ▶ Continuously evaluating operations and procedures affecting system safety
- ▶ Providing a system-wide safety policy that coordinates safety activities throughout the organization and ensures a systematic approach to managing safety hazards
- ▶ Communicating appropriate safety policies and procedures to all employees and the public
- ▶ Interfacing effectively with appropriate government agencies, professional organizations, and citizen's groups regarding safety

Coordination

Our SSPP coordinates the safety activities of every department in the organization. Department responsibilities include, but are not limited to the following:

- ▶ The Operations department has a key responsibility in developing operating procedures for incidents and emergency situations.
- ▶ Administration has a key responsibility in coordinating SSPP activities and communicating and overseeing policies.

Section 2 – System Description

History and Background

MTM Transit is a limited liability company (LLC) and certified woman-owned business enterprise (WBE) established in 2009 in the State of Missouri by the leadership of Medical Transportation Management, Inc. (MTM), a national leader in non-emergency medical transportation management. MTM Transit's principal line of business is providing Americans with Disabilities Act (ADA) paratransit, fixed route, and microtransit service operations, as well as additional transit services such as mobility management, ADA paratransit eligibility assessments, travel training, transit call center operation, and transit quality assurance operations and support.

Access to local resources and amenities are important components of a healthy, productive life, and MTM Transit provides that access with the utmost dignity for every passenger. We are dedicated to offering a balance of innovation and best practices during this new era in transportation, deploying executive attention, technological advances, and responsiveness to maximize program success.

MTM Transit delivers cost savings, increased efficiencies, and customer satisfaction to clients and passengers across the United States in 16 states and the District of Columbia. We administer annual budgets of more than \$27 million and serve a ridership of approximately 3,000 passengers per day by providing over 1.7 million trips per year. Having the support of our affiliate MTM, as well as a respected and practiced leadership team, makes MTM Transit well qualified to meet the paratransit transportation needs of Manteca residents.

To serve the City, MTM Transit employs the following positions:

- ▶ 3 managers, including a Safety and Training Manager
- ▶ 13 FTE operators (both full- and part-time)
- ▶ 1 road supervisor
- ▶ 3 dispatchers (1 lead, 1 full-time, and 1 part-time)
- ▶ 1 utility worker

The business address and telephone number for the local MTM Transit office is:

MTM Transit (at the Manteca Transit Center)
220 Moffat Boulevard
Manteca, CA 95336
(209)0456-8888

Scope of Operation

This section covers the type of service provided by MTM Transit, as well as our operating routes, schedules, and safety-related maintenance requirements.

Scope of Transportation

MTM Transit operates the Manteca Transit system for the City, providing public fixed route bus services, as well as the Dial-A-Ride (DAR) and ADA paratransit vehicle service. Our service also includes in-house vehicle cleaning of the City vehicles used for Manteca Transit, while most of the vehicle maintenance is outsourced to Sunshine Auto Care, Inc., which is fully staffed with ASE-certified technicians and equipped with the tools and equipment needed to maintain and repair the City's transit vehicles. Their facility is less than one mile from the Transit Center making it a cost-effective and efficient option for the program.

Vehicles used in the program include:

- ▶ 9 cutaway vehicles
- ▶ 1 35-foot fixed route bus

These vehicles include both ADA accessible and ambulatory vehicles, as outlined by the City. All vehicles are equipped with a two-way radio system connecting them with the dispatchers.

Maintenance Rules and Procedures

MTM Transit is committed to providing and following operating and maintenance procedures that promote system safety. We comply with all Federal, State, and local requirements regarding vehicle and property maintenance; we also ensure our maintenance subcontractors comply with these same requirements.

MTM Transit follows service standards prescribed by the vehicle manufacturer. The City vehicle maintenance guidelines are followed for inspection of all vehicles. Preventative Maintenance (PM) inspections are conducted at least every 45 days or 3,000 miles, or the manufacturer's suggested mileage (whichever is less). As required, the service schedule is changed to fit those vehicles involved in extra heavy or extra light usages.

Maintenance replacement standards comply with those prescribed by Federal Department of Transportation (DOT) guidelines, which are checked annually by California DOT inspectors. All

work is done by qualified maintenance technicians at off-site locations by private maintenance service facilities; most vehicle maintenance is outsourced to Sunshine Auto Care, Inc.

Daily pre- and post-trip inspections are performed by the operators in accordance with MTM Transit policy, as well as the City and California guidelines. Procedures include, but are not limited to, the following:

- ▶ An inside check of all exits, safety equipment, seats, and gauges
- ▶ An operational check of all switch-operated items
- ▶ An outside check of the vehicle exterior, including all lights, tires, and mirrors

The operator's daily pre- and post-trip inspection report is completed and kept on file for one year.

Vehicle Operator Training Requirements

MTM Transit recognizes the importance of vehicle operator training for system safety. We follow all Federal, State, and local training requirements.

Additionally, all operators are licensed in accordance with the State regulations of the vehicle type they operate.

Forms used to assess required operator qualifications and skills include, but are not limited to, the following:

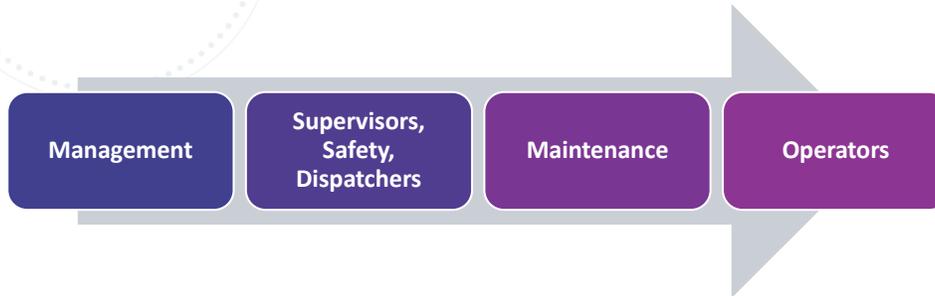
- ▶ Application
- ▶ Annual Physical Authorization Form
- ▶ Annual Operator Evaluation (including applicable road tests)

Organization and Structure

Every employee and department of MTM Transit is expected to contribute to the safety of passengers, employees, and the public, as well as the prevention of property damage. All MTM Transit employees and departments are responsible and accountable for preventing accidents and conducting job functions safely. All employees and departments must comply with all applicable occupational safety operations standards, rules, and instructions pertaining to their job functions.

Structure of Organization

MTM Transit is comprised of management, supervisors, safety personnel, dispatchers, maintenance personnel, and operators. Our organizational chart structure is as follows:



Function Safety Responsibilities

Management

The President/CEO has overall responsibility for establishing a company-wide commitment to safety and for operating and maintaining a safe transportation system. Local management works with the President/CEO to develop, communicate, implement, and update system safety goals. Local management is also responsible for:

- ▶ Incorporating safety awareness into all management decision-making activities
- ▶ Ensuring that all MTM Transit policies are in accordance with safe operating procedures
- ▶ Establishing, enforcing, assessing, and improving the overall safety program, safety program procedures, and processes for communicating safety policies and procedures
- ▶ Investigating unsafe practices
- ▶ Ensuring that sufficient resources are available to implement safety-related activities (e.g., training, hazard resolution, and monitoring results)

Supervisors, Safety Personnel, and Dispatchers

The safety responsibilities for supervisors, safety personnel, and dispatchers include, but are not limited to, the following:

- ▶ Ensuring operators are informed about all relevant information (e.g., road closings, vehicle changes, and schedule changes)
- ▶ Reporting accidents and incidents to management and the corporate safety function
- ▶ Informing management of any system interruption that requires vehicles to be re-routed

- 
- ▶ Distributing safety correspondence, as required
 - ▶ Investigating customer complaints
 - ▶ Assisting in completing accident reports, as required
 - ▶ Implementing disciplinary actions when operating procedures or safety regulations are not followed
 - ▶ Assuming emergency response responsibilities when management is not available

Maintenance

Staff responsibilities for those involved in maintenance and facility safety include:

- ▶ Developing, following, assessing, and improving maintenance safety procedures
- ▶ Ensuring MTM Transit has the number of vehicles required to provide daily service and that vehicles are in good repair
- ▶ Conducting scheduled operations (e.g., Preventative Maintenance)
- ▶ Checking parts and components that may experience abnormal usage
- ▶ Investigating and correcting maintenance problems identified by other functions of the organization
- ▶ Maintaining safe work area conditions
- ▶ Wearing all necessary protective equipment
- ▶ Ensuring that tools and equipment are properly maintained and in a state of good repair

Operators

Operator safety responsibilities include:

- ▶ Adhering to all operating rules and regulations, including safety procedures
- ▶ Conducting an appropriate pre-trip inspection to ensure the vehicle assigned is in proper operating condition, and that all mechanical defects are identified and reported before the vehicle is placed in service
- ▶ Conducting a post-trip inspection upon return to the location and reporting relevant information as appropriate
- ▶ Maintaining control of the vehicle and conduct on the vehicle
- ▶ Reporting relevant information to the supervisors and dispatchers, including:
 - Accidents and incidents
 - Vehicle defects that may cause a service interruption
 - Customer disturbances or illnesses
 - Route interruptions (e.g., detours)
- ▶ Complying with all MTM Transit and client accident reporting procedures following an accident

- ▶ Complying with all MTM Transit and client fitness-for-duty drug and/or alcohol testing procedures

▲ Safety Change Recommendations

Every department within MTM Transit is encouraged to request changes which may improve safety conditions. Every employee is encouraged to bring recommendations regarding safety changes to the attention of their supervisor or a member of the local management team at their earliest convenience.

Employees who observe a potentially unsafe operation or condition are expected to bring the situation to the attention of their supervisor or a member of the local management team at their earliest convenience. Any employee involved in an accident is required to comply with MTM Transit's reporting requirements. The safety personnel and management analyze accident reports to determine safety changes that may be required.

Equipment and Facilities

Equipment and facilities contribute to the safety of passengers, employees, and the public. MTM Transit puts safety first when choosing vehicle stop locations and routes. Routes avoid dangerous locations and other safety hazards, such as backing up, to every degree practical.

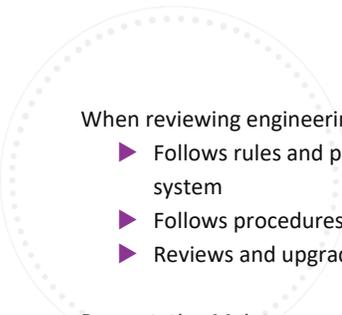
Dispatchers are assigned to an office within the main building. Dispatchers are in contact with all operators through a two-way radio communication system.

All appropriate emergency numbers and copies of emergency procedures are provided to the dispatcher. A multi-line phone system is located next to the two-way radio.

All vehicles in the fleet meet or exceed State and Federal DOT standards. Two-way radio communications systems are installed in all vehicles. Safety equipment on each vehicle includes, but is not limited to, one five-pound BC fire extinguisher, one First Aid Kit, and one set of triangle reflectors.

System Modifications

Ongoing or planned activities to modify the system must consider safety. When modifying or improving existing facilities, management ensures that all applicable safety requirements are addressed and included in drawings, specifications, or plans for modification.



When reviewing engineering changes, MTM Transit:

- ▶ Follows rules and procedures on incorporating changes and modifications into the system
- ▶ Follows procedures to evaluate the effect of the changes on safety
- ▶ Reviews and upgrades safety analyses as required in evaluating system modifications

Preventative Maintenance (PM) inspections are conducted at least every 45 days or 4,000 miles, or the manufacturer's suggested mileage (whichever is less). In the event increments need to be adjusted, we will notify the City with written notice and discuss in further detail.

Accident Investigation Training

Each MTM Transit General Manager attends a Bait Fish Training Program to ensure one staff person at each location is certified in a comprehensive accident investigation.

Section 3 – System Safety Program

System Safety Organization

MTM Transit has appointed a Safety and Training Manager who reports directly to the General Manager and has ultimate responsibility for safety. Their responsibilities include ensuring operators stay current with their safety training.

In addition to overseeing safety for the City, the Safety and Training Manager's responsibilities include assisting the General Manager with the following tasks:

- ▶ Investigating all accidents that are required by regulation to be reported to the City and the California DOT, including, but not limited to:
 - All fatal accidents
 - Accidents that result in five or more injuries
 - A fire onboard a revenue vehicle to which emergency services respond
 - All accidents caused by mechanical failure
- ▶ Ensuring hazard assessments and appropriate resolution processes are initiated once an unsafe activity or situation is identified that presents a potential or actual hazard
- ▶ Investigating all work-related employee injuries, especially those that may require immediate hospitalization, or result in disability or death
- ▶ Evaluating health and safety issues on an ongoing basis to identify unfavorable practices and conditions that may require correction
- ▶ Incorporating safety constraints and preventative procedures into daily operations
- ▶ Promoting system safety coordination to ensure that relevant safety information is communicated to all departments and personnel
- ▶ Assisting management and employees in the development and implementation of safety rules and procedures and emergency preparedness plans
- ▶ Assisting in conducting safety inspections and performing system safety audits to monitor system-wide compliance with the SSPP
- ▶ Supporting management to ensure the SSPP is updated on an annual basis
- ▶ Providing SSPP information to newly hired employees

Personnel

The local management team includes the following individuals:

Name	Title/Position
Mark Frailey	General Manager
Francis Kemp	Safety and Training Manager
Adam Perriera	Maintenance Manager

Our local management team is supported by the following corporate support individuals:

Name	Title/Position
Alaina Maciá	President and CEO
Kerri Mileski	Chief People Officer
Brian Balogh	Chief Operating Officer
Scott Transue	Regional Vice President
Monique Avalos	Director of Safety Administration
Joe Sullivan	Regional Director of Maintenance
Pat Lopez	Director of Transit Technology
Ben Schandle	Regional Director of Sales

Participation in Safety Teams and Boards

The commitment of MTM Transit's President/CEO and General Manager ensures that safety remains a vital concern at all MTM Transit meetings. The General Manager personally represents MTM Transit in local, State, and national safety organizations and committees, ensuring commitment to state-of-the-art safety ideas.

Safety team responsibilities, including overseeing the identification, assessment, and resolution of actual or potential hazardous occurrences, are assigned to the General Manager and the Safety and Training Manager. These responsibilities include, but are not limited to, the following:

- ▶ Performing ongoing reviews of safety rules and procedures
- ▶ Modifying current procedures, developing new procedures, and/or establishing new procedures, as required

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- ▶ Reviewing and approving safety ideas submitted from employees, contractors, vendors, and other sources
 - ▶ Monitoring compliance with the SSPP and other safety requirements
 - ▶ Overseeing the publication and distribution of new or modified safety rules, policies, and procedures
 - ▶ Analyzing accident trends, if any, pertaining to workplace injuries or on-road vehicle operator accidents
 - ▶ Performing safety observations, whether announced or unannounced, including but not limited to:
 - Actions of employees, contractors, and vendors
 - Personal protective equipment (PPE)
 - Tools and equipment
 - Procedures
 - ▶ Distributing safety bulletins
 - ▶ Overseeing safety training
 - ▶ Reviewing SSPP requirements for contract service providers, as required
 - ▶ Monitoring the condition of the building, facilities, and equipment
 - ▶ Coordinating recommendations resulting from investigations to prevent recurrences of hazardous conditions

Additionally, MTM Transit safety committees receive assistance as required from other sources. For example, insurance company safety engineers assist in safety training and programs for all employees.

SSPP Maintenance

MTM Transit recognizes the importance of systematically reviewing, updating, and refining the SSPP. Unless otherwise required, this plan will be revised biennially. This plan may also be revised to respond to priority needs or critical events, as determined by the President/CEO. Approved revision submissions are certified by top management. The refined plan is submitted for recertification and the number of accidents reported to the City for National Transit Database (NTD) reporting.

The internal review of the SSPP includes, but is not limited to, the following:

- ▶ Number of passenger fare vehicles
- ▶ Vehicle replacement information
- ▶ Corporate structure

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- ▶ Number of personnel
 - ▶ Changes in policies, procedures, and practices
 - ▶ Changes in facilities
 - ▶ Reportable accidents
 - ▶ Number of accident occurrences reported to the City for NTD reporting

Management is responsible for distributing and communicating changes in the SSPP to all MTM Transit departments in a timely manner. Procedures to update the SSPP as required for priority/critical items and events, to control revisions, to coordinate revisions to the SSPP within the MTM Transit property, and to distribute changes to the SSPP are provided in this program.

Employee Hiring Practices

MTM Transit selects employees with the best job-related qualifications. Employees are selected without regard to race, color, religion, sex, national origin, age, marital status, handicap, disabled veteran status, Vietnam veteran status, or sexual preference, where prohibited by applicable State or local law. All employment-related policies, procedures, and actions are designed to comply with applicable laws.

Procedures

MTM Transit has developed clear hiring policies. Safety qualifications are incorporated into job requirements for all positions. The safety history of applicants is reviewed prior to hiring.

Employment is contingent upon receipt by MTM Transit of satisfactory references, which may include proof of licenses, degrees, satisfactory driving records, and other documentation. Each current hire has a two-year minimum employment record. All current employees of MTM Transit have been hired from related companies.

MTM Transit's hiring procedures also include, but are not limited to, the following:

- ▶ Compliance with all Federal, State, and local guidelines regarding approval for positions such as vehicle operators (e.g., infractions on operator records that may be sufficient cause to decline approval for such operators may include no more than four points on a driving record and no drug or alcohol conviction within the past five years)
- ▶ Checking references from the applicant's three most recent employers within the last ten years
- ▶ Storing replies from references in the new employee's personnel file

Minimum Qualifications for Operators and Other Employees

To protect the interests of MTM Transit and the privacy of employees, background investigations of individuals applying for safety sensitive and other positions follow all applicable laws.

All MTM Transit employees are important to ensuring safety within our organization. It is especially important that operators and safety sensitive employees meet or exceed all requirements set by Federal, State, and local authorities prior to being hired.

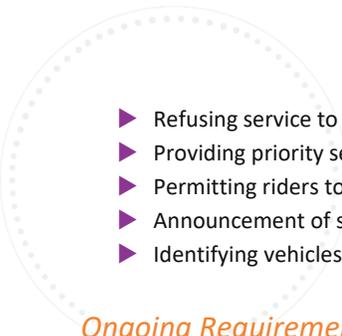
All operators must meet all qualifications stated above, as well as the following requirements:

- ▶ A valid California Class "B" driver's license and medical card
- ▶ Verification of Transit Training Certificate issued by the DMV, pursuant to Section 12804.6
- ▶ A California General Public Paratransit Vehicle (GPPV) certificate issued by the DMV
- ▶ Pre-employment DMV checks and a DMV re-check at least every six months to determine and ensure a satisfactory driving record
- ▶ Complete MTM Transit's extensive training program

Newly transferred employees and new hires receive safety training and safety policy briefing during the orientation process. Operators are required to attend a pre-service classroom program to review driving safety, passenger safety, and MTM Transit policies. New hires sign a receipt acknowledging they have received and read all appropriate MTM Transit policies and rules.

ADA training takes place with all employees and includes, but is not limited to, the following:

- ▶ Titles of the ADA
- ▶ Person with a disability ADA definition
- ▶ Basic purpose
- ▶ What the ADA addresses
- ▶ Access to communication and information
- ▶ Employee training
- ▶ Boarding/alighting time
- ▶ Lift and securement use, including the use of securements per company policy on all wheelchairs
- ▶ Maintenance of lifts, including that all those who request the lift may use it
- ▶ Mobility aids and life support systems
- ▶ Additional charges

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- ▶ Refusing service to customers with disabilities
 - ▶ Providing priority seating
 - ▶ Permitting riders to disembark
 - ▶ Announcement of stops
 - ▶ Identifying vehicles and/or customers

Ongoing Requirements

Employee performance is continuously reviewed for compliance with job requirements. Operators are required to maintain a current driver's license and to show it upon request, as required.

Physical, mental, and skill exams are administered, in accordance with Federal and State regulations. Drug and alcohol testing are performed in accordance with State and Federal laws. MTM Transit complies with the FTA requirement to randomly drug test 50% of the safety sensitive workforce annually and to conduct annual random alcohol tests of 10% of the total workforce.

Employee records of preventable accidents and/or incidents on the job are reviewed. Additional training is initiated as required. All employees are expected to ensure that the property conforms to the local and State requirements.

Substance Abuse Programs

MTM Transit does not tolerate employee drug or alcohol abuse. We monitor drug and alcohol abuse in accordance with Federal DOT guidelines. MTM Transit requires pre-employment drug and alcohol tests. Employees are also required to take an annual drug and alcohol test. Monitoring is also done for reasons including, but not limited to, the following:

- ▶ Random testing
- ▶ Reasonable suspicion
- ▶ Post-accident

MTM Transit does not allow a "second chance" regarding substance abuse that can affect safety. USDOT/FTA regulations regarding a four-hour minimum time between alcohol use and driving time are strictly adhered to. Employees suspected of abusing drugs or alcohol are interviewed, tested, and if circumstances warrant, given a reasonable suspicion test, which could result in termination if positive for prohibited substances or alcohol.

Notification of Vehicle Accidents

MTM Transit gives the City immediate notice and written notice, as further detailed in this policy, of the following accidents:

- ▶ All fatal accidents
- ▶ Any accident which results in five or more injuries to persons involved in the accident
- ▶ All accidents caused by mechanical failure, including, but not limited to, all fires that occur in revenue service that require passenger evacuation and response by a fire department regardless of whether injuries were incurred

Immediate notice of the above occurrences is also reported by telephone to MTM Transit claims reporting at 563-585-8856 or Weekends/Afterhours 877-241-6121. Immediate notice of all said accidents is required, and such notice is not delayed for more than 90 minutes. These notices, at a minimum, include the date, time, and location of the occurrence and the approximate number of persons killed or injured. The person making the notification provides their name and title, the public transportation system or service involved, and states where they can be reached for further details. In addition, the person making the notification also supplies any additional information requested. MTM Transit ensures all physical evidence of the accident scene is properly documented prior to the scene being cleared.

Hazard Identification

MTM Transit performs hazard analysis to identify hazardous conditions that may be eliminated or controlled. Potential hazards are systematically identified and assessed to determine their impact on the total system. Determinations are made regarding the extent of corrective measures to eliminate the hazard or reduce its severity.

▲ Safety Problem Identification

The identification of hazards that may potentially result in accidents is the first step in a proactive safety program. MTM Transit's hazard resolution process provides plans and procedures to identify and manage hazards. The process identifies and analyzes safety issues for the purpose of determining hazard severity and probability, recommending corrective actions, and documenting results.

The hazard identification process is initiated through any of the following ways:

- ▶ **Customer Concerns.** Customer safety concerns regarding operator performance, service, or equipment are recorded. Concerns are reviewed and reported to the General Manager. Resolutions are explored.
- ▶ **Employee Observations.** Any employee who observes any current unsafe condition is responsible for notifying their supervisor or a member of the local management team regarding concerns at their earliest convenience.
- ▶ **Internal/External Audits.** Findings of audits conducted by and for MTM Transit are monitored and communicated to the responsible department.
- ▶ **Unusual Events.** Management is responsible for initiating responses to unusual events that occur within the facilities or vehicle system.
- ▶ **Legislative Requirements.** The General Manager monitors legislation pertaining to safety and informs appropriate departments as required.
- ▶ **Industry Trends.** Each department is responsible for analyzing industry trends that may be related to internal hazards.
- ▶ **Safety Team.** Team members are responsible for conducting safety observations and monitoring corrective action regarding observed hazards or safety compliance.

In addition to the hazard resolution process, ongoing operations are monitored and reviewed, equipment is inspected and analyzed, and operating procedures are analyzed to identify potential safety problems. Hazards that are identified are described on the Hazard Assessment Form.

▲ Hazard Assessment

Hazard probability ratings on the Hazard Assessment Form are defined based on the following chart:

Description	Level	Specific Individual Item	Fleet or Inventory
Frequent	A	Likely to occur frequently	Continuously experienced
Probable	B	Will occur several times in the life of an item	Will occur frequently
Occasional	C	Likely to occur sometime in the life of an item	Will occur several times
Remote	D	Unlikely but possible to occur in the life of an item	Unlikely but can reasonably be expected to occur
Improbable	E	So unlikely that it can be assumed occurrence may not be experienced	Unlikely to occur, but possible

Hazard severity ratings on the Hazard Assessment Form are defined based on the following chart:

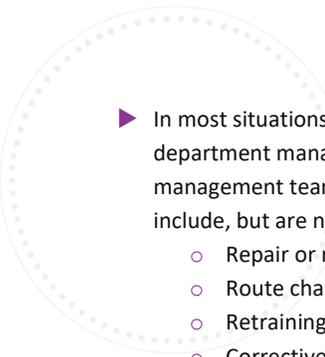
Hazard Risk Matrix				
Probability of Occurrence	Severity of Occurrence			
	Category 1 Catastrophic	Category 2 Critical	Category 3 Marginal	Category 4 Negligible
A – Frequent	1A	2A	3A	4A
B – Probable	1B	2B	3B	4B
C – Occasional	1C	2C	3C	4C
D – Remote	1D	2D	3D	4D
E – Unlikely	1E	2E	3E	4E
Hazard Risk Index		Criteria by Index		
1A, 1B, 1C, 2A, 2B, 3A		Unacceptable		
1D, 2C, 2D, 3B, 3C		Undesirable – Management Decision Required		
1E, 2E, 3D, 3E, 4A, 4B		Acceptable With Management Review		
4C, 4D, 4E		Acceptable Without Review		

Hazard Analysis And Resolution

MTM Transit has established methods to develop and implement resolution alternatives. Decisions regarding how to resolve hazards are made once the Hazard Assessment Form has been used to establish frequency and severity of the problem, all aspects of the problem are reviewed, key individuals are consulted, and an assessment is made of the involved risk. The Hazard Assessment Form is used to establish priorities of corrective action and problem resolution.

Methods to develop and implement resolution alternatives include, but are not limited to, the following:

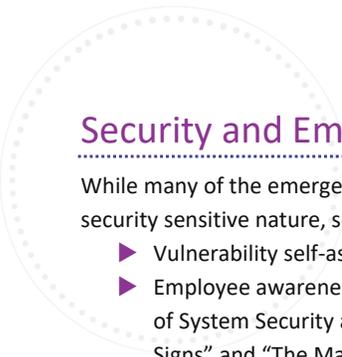
- ▶ As soon as a potential or actual hazardous condition is reported by an employee, customer, or other source, the department head responsible for the equipment, facility, or environment subject to investigation is immediately notified.
- ▶ If, in the best judgment of the responsible party, a hazard exists that requires urgent attention, immediate action is taken to dispose of the hazard.
- ▶ A hazard assessment is forwarded to the General Manager or their designated representative to justify decisions or actions taken or suggested to be taken regarding any hazards or reports of hazards.

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- ▶ In most situations, resolutions to problems are developed with the cooperation of the department manager or supervisor presenting the problem, a member of the local management team, and other individuals as required. Examples of recommendations include, but are not limited to, the following:
 - Repair or replacement of vehicles
 - Route changes
 - Retraining
 - Corrective action for an employee
 - ▶ Hazard assessment reports and resolution priorities are evaluated by the General Manager or their designated representatives. Recommendations may range from "Immediate Resolution Required," to "Resolution Required Within 24 Hours," to "Resolution Required Within One Week of Notification," to "Conditionally Acceptable." If at any time the General Manager does not concur with the hazard assessment or action taken, they make the final determination regarding the disposition of the hazard.
 - ▶ When evaluating assessment reports, the impact on safety resulting from implementation resolution alternatives are assessed. The effects of the implemented resolutions are assessed also for further action.
 - ▶ The safety team is responsible for coordinating all corrective action implementation.
 - ▶ Follow-up is conducted to ensure that work is completed on all implemented resolutions. The safety team is responsible for overseeing the follow-up process.
 - ▶ Hazard assessment reporting information is reviewed monthly. Trend analyses of all reported potential hazards, incidents, or accidents are also performed monthly.

Additional Hazard Assessment and Resolution Procedures

In addition to the methodology described above, other procedures for hazard assessment and resolution have also been established. These procedures include, but are not limited to, conducting:

- ▶ Daily inspections of work areas
- ▶ Weekly inspections of fire panels, sprinkler control valves, and standpipes
- ▶ Monthly inspections of lifts, jack stands, electrical disconnects, service panels, safety interlocks, first aid stations, and general housekeeping



Security and Emergency Awareness

While many of the emergency preparedness plans include information of a confidential and security sensitive nature, some of the elements are as follows:

- ▶ Vulnerability self-assessment is completed on the FTA website questionnaire.
- ▶ Employee awareness training is provided by our staff. Training includes all the elements of System Security and incorporates the National Transit Institute (NTI) videos “Warning Signs” and “The Mark” as training tools.
- ▶ Documents that are of a security sensitive nature are marked as such to limit access.
- ▶ The corporate and local staff receives FTA and Department of Homeland Security (DHS) alerts from the automated system on a regular basis as they are issued.
- ▶ The local staff are active members and available to participate in local emergency preparedness plans, drills, and activities with all local emergency agencies.

Accident and Incident Investigations

In the event of any accident, post-accident, or incident, investigations are initiated by management as part of the hazard resolution process. The accident investigation plan is tied into the accident prevention program. The General Manager is ultimately responsible for both programs. Equipment used for accident/incident investigations includes cameras, recorders, witness forms, and checklists. Results and recommendations of accident/incident investigations are distributed to all relevant personnel for review and comments.

Company Accident Record

MTM Transit's goal is to remain accident free. The number of accidents has been in the single digits to date and remains so currently. Below is an example of accidents reported for a typical year:

- ▶ Accidents = 0
 - Reportable to NTD = 0
 - Reportable to DMV (more than \$1,000) = 0
 - Reportable to Insurance Company (less than \$1,000) = 1



When to Complete Reports

An accident report must be completed when:

- ▶ A vehicle is involved in a collision with another vehicle, a stationary object, or a pedestrian
- ▶ A customer falls while boarding, alighting, or outside the vehicle
- ▶ A pedestrian collides with a vehicle
- ▶ A customer is injured because of vandalism to the vehicle
- ▶ An operator is hurt while operating the vehicle or while in the vehicle

An incident report must be completed for:

- ▶ Miscellaneous incidents such as fires
- ▶ Police assistance required on or near the vehicle
- ▶ Vandalism on the vehicle that does not cause injury
- ▶ A customer becomes ill on the vehicle and requires assistance

How to Inform the DOT About Accidents

The operator retains an Accident Register, including any accident information required, as per DOT regulations 390.15.

Reporting Work Related Accidents

An employee who sustains an injury because of their employment is responsible for:

- ▶ Reporting the accident or injury immediately to their supervisor
 - If the nature of the injury requires immediate emergency medical treatment, the employee's supervisor calls for immediate assistance.
 - Based on the seriousness of the accident, the dispatcher notifies emergency personnel of the situation.
- ▶ Reporting for first aid treatment, if required
- ▶ Completing an MTM Transit Worker's Compensation Report of Injury Form within 24 hours of the accident or injury, as appropriate
 - If the employee is unable to complete the form, their supervisor is responsible for its completion.
- ▶ Cooperating in all aspects of their medical treatment to ensure the employee can return to work as soon as it is medically feasible

Once the form is complete, the employee's supervisor is contacted to investigate the circumstances that caused the accident or incident. Depending on findings, recommendations

from management may include that the employee receive safety counseling and/or that they contributed to the cause of the accident.

Operational Accident/Incident Investigations

In the event an employee is involved in an accident while operating a revenue or non-revenue vehicle, the employee is responsible for the following:

- ▶ Reporting the accident or incident immediately to the dispatcher and advising the dispatcher if medical assistance is required at the scene
 - If the radio is not working, the employee uses a public telephone to call the dispatcher.
- ▶ Ensuring that any vehicle involved in an accident (other than a negligible incident) is not moved until police or an MTM Transit representative arrives to give authorization to move the vehicle
- ▶ Ensuring that no statements are made except to police or vehicle representatives
- ▶ Securing reports from witnesses to the accident
- ▶ Remaining on the scene until the vehicle is released by the police or MTM Transit management
- ▶ Complying with FTA/USDOT drug and alcohol testing
- ▶ Making a full report of the accident after returning to the office
 - The report must be signed and dated, with facts plainly indicated.
 - If circumstances (e.g., injury) prevent an employee from personally reporting an accident, the employee's supervisor ensures that a report is completed.

The employee's supervisor is responsible for:

- ▶ Reviewing the accident report for all relevant documentation and determining if the accident was preventable or non-preventable
- ▶ Forwarding the accident report and all relevant documentation to the General Manager to independently determine if the accident was preventable or non-preventable, and actions that should be taken

Performing Scene Investigations

Scene investigations are required for all accidents except those with negligible results. Scene investigations include, but are not limited to, gathering reports, taking pictures, developing scene layouts, and cooperating with government agencies as required. Operators assist with passenger stabilization, develop scene layouts, identify witnesses, and assist police officers, as required.



Hazard Assessment Forms are completed. Accidents are reviewed by MTM Transit officials and safety representatives from appropriate insurance companies. Accidents are assessed and analyzed, and resolutions are generated and prioritized. Drafts of suggested resolutions are distributed to appropriate departments. Final resolutions are made.

Depending on the findings of post-accident reviews, operators are provided with additional training in operator safety and education, and/or other appropriate actions are taken in all relevant departments. Follow-up checks are performed to determine the effectiveness of the recommendations, and provisions are made to amend or revise recommendations and the accident/incident investigation plan. The investigation is tied into the accident prevention program and the report becomes part of the safety data file.

▲ Analysis of Accident Reports

Data analysis of accidents and property loss are performed by management and reported on a regular basis; these reports include cost, injury, and lost workdays. These metrics are reported on a quarterly basis, at a minimum. Management reviews of accident and incident recommendations take place in a timely manner.

If an accident, incident, workplace injury, or potential hazard occurs, a hazard assessment report is completed, and resolution priorities are evaluated. Recommendations may range from "Immediate Resolution Required," to "Resolution Required Within 24 Hours," to "Resolution Required Within one week of Notification," to "Conditionally Acceptable."

The General Manager circulates the report to any other departments that are affected for comments. The affected departments either indicate agreement with the recommendations that are proposed or provide comments to facilitate corrective action. The General Manager has final approval of the corrective action plan.

All investigations and reports are completed within seven days of any accident, incident, or workplace injury that may result in death or disability, require hospitalization, or, in the judgment of the General Manager, require an investigation. All other investigations and reports are completed within two weeks. Required corrective actions are implemented.

▲ Safety Data File

Accident and incident investigation reports and/or recommendations are part of the safety data file. Records are maintained in accordance with Federal and State laws. Reports are retained for periods in conformance with local, County, State, and Federal regulations. Records are readily accessible to those who are required to have access to them.

▲ Previous Investigation Records

Previous investigation records meet the following requirements:

- ▶ Previous investigations are fully documented and include recommendations to management. The cost of the accident is analyzed and categorized. Accident recommendations are prioritized. In the case of an accident, the operator's record is reviewed, causes are determined, and the operator is debriefed.
- ▶ Recommendations are implemented or a rationale is provided as to why not.
- ▶ Follow-up checks are made to determine the effectiveness of the recommendations.
- ▶ Provisions are made to amend or revise the accident/incident investigation, as required.

Safety Training

The local management team is responsible for establishing guidelines and developing and conducting training to all employees, as appropriate. The safety team evaluates the development of training activities that impact safety and provides the final approval to conduct training.

All training is done in conformance with State regulations and laws. Training is provided individually and/or in group sessions. Required and needed training in the classroom and/or on a vehicle is provided by certified instructors. Training is provided in the timeframes required by law and when deemed appropriate by management. The training program plan is reviewed biennially, or as required by property condition. Required introductory and refresher classroom sessions are given by certified instructors.

▲ Documentation

As part of the training program, students are provided manuals, safety rules, and a rule book, as appropriate. To satisfactorily complete the training, students must demonstrate familiarity with safety rules and demonstrate familiarity with procedures to identify, assess, and report hazards. Following training, feedback is elicited from students regarding the effectiveness of instruction. MTM Transit records the number of students who complete and do not complete training, and

the reasons why students do not finish. The General Manager conducts periodic audits to establish the quality and effectiveness in meeting safety-related goals and objectives.

▲ Training Requirements for Operators

Training requirements define the scope of the program, both for in the classroom and on the road. Training orientation requirements for operators include a general orientation program with the property. Familiarity with the properties, facilities, and local area is also required.

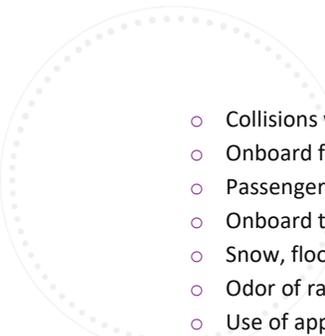
Training includes roads and route training, applicable map reading, and the location of local medical, police, and fire facilities. Trainees are required to undergo route training to destinations and points of common interest. Route training includes first driving the route without passengers, and then driving the route with passengers. An operator trainer is in attendance during route training activities.

Safety is a part of the overall training program. With responsibility for both training and safety, the local management team ensures that safety training is initiated into the overall training program.

Instructors meet selection standards, including safety training. Standardized lesson plans include training requirements. The role of safety in the overall organization and management's attitude and policy toward safety are made clear.

Operator training encompasses all applicable Federal, State, and local safety rules and regulations. Instruction on the operation of safety-related equipment includes, but is not limited to, the following topics:

- ▶ The safe operation of:
 - Doors, door interlocks, and other safety features
 - Wheelchair lift and its safety features, as applicable
 - Brakes and safe acceleration and deceleration rates
 - Mirrors, sun visors, and wipers
 - Vehicle communication system (e.g., radio)
- ▶ Passenger safety, which includes knowledge of onboard causes of accidents and injuries, safe acceleration and deceleration rates, and sensitivity to the physical limitations of disabled persons and the elderly
- ▶ Emergency standard operating procedures, which includes, but is not limited to, training for:
 - Traffic accidents

- 
- Collisions with fixed objects
 - Onboard fire or smoke
 - Passenger injury or illness
 - Onboard theft, fight, or improper conduct
 - Snow, flooding of route, and severe weather
 - Odor of raw fuel fumes
 - Use of appropriate safety equipment (e.g., accident kits)

▶ Formal defensive driving techniques

MTM Transit also posts safety bulletins and has frequent safety discussions. Newly assigned vehicle operators and new hires receive safety training prior to performing the job. Retraining procedures are in place for operators.

Additionally, the local staff participates in maintenance training when new equipment is brought onboard, whenever possible.

▲ Evacuation Training

All operators are trained in the evacuation of a vehicle in an emergency. Qualified instructors teach operators how to properly evacuate passengers from a vehicle in a safe and orderly fashion.

Training includes safety video and safety meetings with group discussions. To ensure that operators are prepared for vehicle evacuation, prior to each vehicle going into service a pre-trip vehicle inspection is completed by each operator to be certain that all emergency equipment is in safe operating condition.

Safety-Related Operations Activities

MTM Transit recognizes that the environment in which the vehicle operates plays a significant role in the number and types of accidents. Heavy traffic conditions, poor roads, cold and icy winters, and narrow thoroughfares are all situations which the operator must deal with. A poor environment can create conditions which lead to a high frequency of non-severe accidents and mechanical failures, which can prove costly to the system in the long run.

Passenger acceptance of the system can degenerate. The public's opinion of the transit system can also be harmed because of accidents relating to a poor environment. All facets of the

operating environment are explored thoroughly and a means to deal with them are identified in the SSPP.

Operator Safety Responsibilities

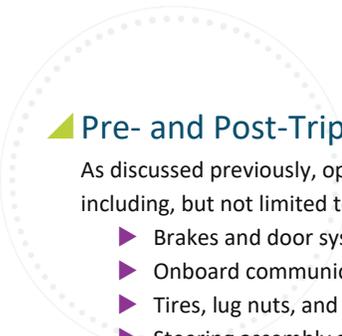
MTM Transit has a policy regarding safety responsibilities of the operations/transportation department. As described previously, this policy includes the responsibilities for the supervisors, safety personnel, dispatchers, and operators. Operator safety responsibilities include:

- ▶ Adhering to all operating rules and regulations, including safety procedures
- ▶ Conducting an appropriate pre-trip inspection to ensure the vehicle assigned is in proper operating condition, and that all mechanical defects are identified and reported before the vehicle is placed in service
- ▶ Conducting a post-trip inspection upon return to the location and reporting relevant information as appropriate
- ▶ Maintaining control of the vehicle and conduct on the vehicle
- ▶ Reporting relevant information to the supervisors and dispatchers, including:
 - Accidents and incidents
 - Vehicle defects that may cause a service interruption
 - Customer disturbances or illness
 - Route interruptions (e.g., detours)
- ▶ Complying with all MTM Transit and client accident reporting procedures following an accident
- ▶ Complying with all MTM Transit and client fitness-for-duty drug and/or alcohol testing procedures

Emergency Response Procedures

MTM Transit has emergency response procedures in place and trains operators to respond to a variety of emergencies. Procedures in place include, but not limited to, emergency operating procedures for:

- ▶ Fire or smoke on the vehicle
- ▶ Evacuating passengers from the vehicle
- ▶ Collision with another vehicle or fixed object
- ▶ Striking a pedestrian
- ▶ Disruption incident on the vehicle
- ▶ Severe or inclement weather
- ▶ Route detours



Pre- and Post-Trip Inspections

As discussed previously, operators conduct pre- and post-trip inspections of vehicle equipment including, but not limited to, the following:

- ▶ Brakes and door systems
- ▶ Onboard communication systems, exterior and interior lights, and reflectors
- ▶ Tires, lug nuts, and studs
- ▶ Steering assembly and suspension system
- ▶ Kneeling system, wheelchair lift (as required), and tie down systems
- ▶ Windshield wipers, mirrors, horn, and seat belts
- ▶ Vehicle exterior, vehicle interior, and steps
- ▶ Onboard fire extinguisher, first aid kit, fuses, and triangle reflectors

Hours of Service

This MTM Transit operation for the City follows the short-haul hours of service provision which states:

- ▶ The operator operates within a 150 air-mile radius (172.6 statute miles) of the normal work reporting location
- ▶ The operator, except an operator-salesperson, returns to the work reporting location and is released from work within 14 consecutive hours
- ▶ A passenger-carrying commercial motor vehicle operator has at least eight consecutive hours off-duty separating each 14 hours on-duty
- ▶ The motor carrier that employs the operator maintains and retains for a period of six months accurate and true time records showing:
 - The time the operator reports for duty each day
 - The total number of hours the operator is on-duty each day
 - The time the operator is released from duty each day
 - The total time for the preceding seven days for operators used for the first time or intermittently

Revenue Service Checks

Revenue service checks are conducted at various times and places, especially within school zones and areas with a high citation rate. Revenue service checks include, but are not limited to, the following:

- ▶ Determining the operator's general performance and conformance to the standard operating procedures

- ▶ Determining the operator's handling of elderly and disabled passengers and sensitivity to their situation
- ▶ Schedule adherence

Additional Operator Safety-Related Activities

Operations works with the local management team to establish safety training requirements. Operations helps resolve unsafe practices and investigates accidents and incidents, as outlined in this SSPP. Safety performance is part of employee evaluation.

Safety-Related Maintenance Activities

MTM Transit recognizes that well-maintained equipment and facilities result in a reduction in potential hazards. Our service also includes in-house vehicle cleaning of the City vehicles used for Manteca Transit, while most of the vehicle maintenance is outsourced to Sunshine Auto Care, Inc., which is fully staffed with ASE-certified technicians and equipped with the tools and equipment needed to maintain and repair the City's transit vehicles. Their facility is less than one mile from the Transit Center making it a cost-effective and efficient option for the program.

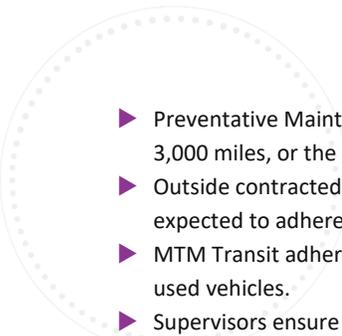
All maintenance work adheres to applicable Federal, State, and local requirements, including the City's requirements. All maintenance technicians are certified. Maintenance technicians complete a Preventative Maintenance Inspection and Service Checklist per the City requirements. Inspections are carried out twice a year to ensure compliance with maintenance regulations.

This section refers to maintenance rules and procedures that apply to safety, including flow of information, working schedules and responsibilities of maintenance personnel, equipment and locations which require maintenance, and frequency in which activities are carried out. Routine procedures including pre-trip inspections carried out by operators prior to taking a vehicle into service and procedures regarding defects that are discovered while in service are also provided in this SSPP.

Vehicle Maintenance Policies and Programs

Vehicle maintenance policies and procedures presented in this SSPP include, but are not limited to, the following:

- ▶ Employees receive orientation to vehicle maintenance policies and programs.
- ▶ Scheduled service is appropriately provided for equipment, based on mileage and time.

- 
- ▶ Preventative Maintenance (PM) inspections are conducted at least every 45 days or 3,000 miles, or the manufacturer's suggested mileage (whichever is less).
 - ▶ Outside contracted maintenance technicians providing repairs for MTM Transit are expected to adhere to maintenance policies that promote safety.
 - ▶ MTM Transit adheres to rigorous policies regarding the purchase and maintenance of used vehicles.
 - ▶ Supervisors ensure that emergency request for safety-related requirements are processed in an expeditious manner.
 - ▶ Prior to the award of a contract, bid, or proposal, the maintenance department ensures that MTM Transit has complied the most appropriate specifications, including all safety requirements.
 - ▶ Supervisors ensure that all warranty provisions contained in vehicle, product, or service agreements are complied with by vendors as required.
 - ▶ Supervisors ensure that tests of vehicles or products are performed with the proper tools and equipment and that employees performing tests have received appropriate training in test procedures.
 - ▶ Supervisors monitor vehicle and safety information issued by manufacturers and vendors to ensure that such information is disseminated to all affected departments and employees.

▶ Preventative Maintenance Procedures and Schedules

Preventative maintenance procedures and schedules include, but are not limited to, ordering materials and components to keep MTM Transit's fleet in a state of good repair, ensuring that the preparation of specifications and selection of materials and components address all applicable safety requirement and established performance limits, test requirements, and allowable wear limits for vehicles and components. Preventative maintenance tests and inspections include, but are not limited to, the following:

- ▶ Brake and air systems
- ▶ Onboard communication systems, interior and exterior lights, and reflectors
- ▶ Tires, lug nuts, and studs
- ▶ Steering assemblies
- ▶ Wheelchair lift/kneeling systems (as applicable) and tie down systems
- ▶ Windshield wipers, mirrors, and horns
- ▶ Body exterior, interior, and steps
- ▶ Suspension systems
- ▶ Fire extinguishers, first aid kits, fuses, and triangle reflectors
- ▶ Seat belts



▲ Corrective Maintenance Procedures

Corrective maintenance procedures for equipment and systems in place include, but are not limited to, the following:

- ▶ Maintenance procedures are current, and the revisions are controlled.
- ▶ Maintenance personnel are provided current corrective maintenance procedures, which supervisors ensure are followed.
- ▶ Corrective maintenance actions are recorded and filed.
- ▶ Defect reports provided by operators are used for corrective maintenance planning.

Section 4 – Program Implementation and Maintenance

Internal Reviews

MTM Transit performs internal audits to help ensure that all elements within the property follow the SSPP. As appropriate, the plan includes a schedule of audits, objectives of the audits, and how identified discrepancies are resolved.

Periodic reviews are performed to ensure that operators and all other employees are following procedures. Maintenance work recall records are reviewed to check the proficiency of the maintenance personnel. The Motor Vehicle Department's instant notification system for traffic violation conditions is applied for all employees. All operators are periodically checked as appropriate per specific State guidelines. Periodic road checks are performed by safety personnel.

Management conducts periodic reviews to ensure that the quality of training for operators and all personnel is appropriate. Results of the reviews are distributed to appropriate personnel, with actions assigned. Management follows up on the effectiveness of actions taken because of the internal reviews.

External Reviews

MTM Transit is also subject to external reviews, audits, and/or investigations with outside agencies including, but not limited to, the following:

- ▶ Federal
 - Federal Transit Administration
 - Environmental Protection Agency
 - Occupational Safety and Health Administration
 - Bureau of Alcohol, Tobacco, and Firearms
 - American Public Transit Association.
 - National Transportation Safety Board
 - National Institute for Occupational Safety and Health (for workplace safety)
- ▶ State of California
 - California Department of Transportation
 - California Department of Environmental Conservation
 - California Department of Labor

- California Office of the Physically Challenged
- Controller

▶ Local

- Mass Transit Operating Assistance Program (e.g., records management)
- UMTA (e.g., records management)
- Health Department
- Fire Marshall
- Planning Commission
- Department of Public Works (Hazardous Materials Section)
- Police Departments
- Emergency Planning Commissions
- Fire Departments
- Audit Department

▶ Other

- Insurance Company audits include reviewing operator abstracts, accident files, and workplace safety. MTM Transit participates in emergency preparedness meetings under the direction of the Local Emergency Planning Commission.
- Recommendations made by external auditing agencies are reviewed by management and appropriate departments. Recommendations are filed with a rational for action. Actions are made as required.

Commented [JT1]: Are these applicable for Manteca?

Collect and Maintain Data

MTM Transit recognizes the importance of identifying the types of information collected at the location, how it is used to verify the level of safety, where the information is filed, and how it is retrieved. The safety team plays a key role in analyzing and utilizing data.

Each department gathers and files relevant internal safety data. Data includes, but is not limited to, all relevant information required by organizations providing external reviews, as well as information required for internal reviews. Data is provided to MTM Transit management.

Accident, incident, and/or defect reports are collected and maintained as discussed in this SSPP. Data collected is indexed, filed, and readily available. Collection and maintenance of all reports meets Federal, State, and local requirements.

Maintenance records and reports are maintained as per the City and/or State requirements.

Operator reports are maintained in personnel files.

Inspection reports are collected and maintained in various areas including, but not limited to the following:

- ▶ Scheduled maintenance reports
- ▶ Collective maintenance reports
- ▶ Vehicle pre- and post-trip inspection reports or shift inspection reports
- ▶ Vehicle safety inspection reports
- ▶ Route inspection reports

Professional Development

MTM Transit encourages all employees, particularly those responsible for safety, to enhance their professional skills through training, development planning, professional affiliations, and other programs. Training is provided to all MTM Transit employees.

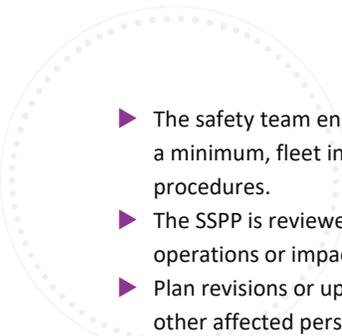
Mandatory and voluntary programs provided by manufacturers, educational institutions, and other sources are scheduled for employees as appropriate. Records regarding training are kept for each employee. A training and development plan is in place for individuals responsible for safety.

Safety team personnel are informed of new codes and regulations that affect MTM Transit. Members of the safety team are encouraged to attend professionally accepted safety courses, such as at USDOT Transportation Safety Institute and universities for professional development. Safety team members are encouraged to participate in industry-wide organizations.

SSPP Implementation and Maintenance

Management is responsible for distributing and communicating changes in the plan to all MTM Transit departments in a timely manner. Procedures to update the SSPP as required for priority/critical items and events, to control revisions, to coordinate revisions to the SSPP within the MTM Transit location, and to distribute changes to SSPP include the following:

- ▶ The SSPP is distributed by the President/CEO and/or the General Manager to all supervisors and managers. All recipients are required to sign a System Plan Signature Statement, indicating that they received the plan and are responsible for having the plan available to all employees in their department.

- 
- ▶ The safety team ensures that the SSPP is revised on a biennial schedule and includes as a minimum, fleet information, an organizational chart, and any updated policies or procedures.
 - ▶ The SSPP is reviewed annually by all departments to ensure changes that affect vehicle operations or impact the SSPP are incorporated, as necessary.
 - ▶ Plan revisions or updates are distributed as addendum pages to all plan holders and other affected personnel.
 - ▶ When there are significant revisions of the SSPP, the plan is rewritten and distributed to replace the old plan.
 - ▶ In the event significant changes are made regarding operating procedures and policies, training is provided to employees as appropriate.

Section 5 – Certification

System Safety Program Plan Certification Statement

I, Alaina Maciá, President and CEO, certify that this SSPP for MTM Transit has been properly distributed, is currently in effect, functioning as stated, and will be fully enforced by company management.



Alaina Maciá, President and CEO

July 1, 2023

Date



Transit Employee
Safety and Training Manual



2022

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YOUR TRANSIT EMPLOYEE SAFETY AND TRAINING MANUAL

This Transit Employee Safety and Training Manual has been designed in conjunction with the Employee Handbook to provide you with information and guidelines about the safety policies, practices, responsibilities, and benefits that are part of working for MTM Transit. While it covers many of our policies and procedures, it is not intended to cover every question or situation that may arise. Further, it should not be deemed to constitute an employment contract. The manual includes some common operator job details such as defensive driving, ADA passenger sensitivity and mobility device securement.

1. GENERAL

EMPLOYEE SAFETY EXPECTATIONS

SAFETY IS A CONDITION OF EMPLOYMENT

MTM Transit must exhaust every reasonable means to lead, motivate, train, and take provisions to ensure our employees work to and help maintain a safe workplace. We expect our employees to follow the rules and not take chances. The actions of all MTM Transit employees reflect on MTM, so employees are responsible for behaving in ways that are beneficial to the company and, at the very least, they should not take chances or do anything that can cause harm to them or others.

We all share the responsibility for encouraging a strong safety culture at MTM Transit by working constantly to improve behavior and performance in the workplace. We all share accountability to encourage our peers to value our MTM Transit safe work practices and safety processes in a positive, proactive way. If you think a job or a task is unsafe, stop the work. You are empowered to stop unsafe acts or unsafe conditions.



If you see something unsafe, report it. If you see an unsafe behavior, correct it, or report it. MTM Transit will not discipline reported/ reporting employees. We will retrain employees to avoid the risky behavior or unsafe act in the future.

Per the new Safety Management System (SMS) guidelines mandated by the Federal Transit Administration (FTA), all MTM Transit employees are expected to be safety officers and the eyes of safety for the company and their fellow workers.



SAFETY IS AN ETHICAL RESPONSIBILITY OF ALL EMPLOYEES

At its core, ethics holds up a positive vision of what is right and what is good. It defines what is "worth" pursuing as guidance for our decisions and actions. Workplace injuries and deaths are too often seen in the abstract as statistics. However, when it happens to someone we love, we suddenly see the reality of the horrible pain and suffering and its widespread effect. It is our ethical responsibility to do what is necessary to help protect our fellow employees from death, injury, and illness in the workplace. This is the only foundation upon which a true safety culture can be established in any workplace. All MTM Transit employees must act as safety officers and work as a team.

PERSONAL "OWNERSHIP" FOR SAFETY

Many employees work individually as operators of motor vehicles. While on the road, the vehicle operator is the only person in control of his/her work environment. Control depends on the employees' attitudes and commitment to safety. We must take the time to do each of our jobs correctly; "at-risk" behaviors cannot be taken. Each employee is expected to drive defensively and watch out for potential hazards.

DEFINING AND MEASURING MTM TRANSIT'S SAFETY CULTURE

Defining, measuring, and developing metrics is an important first step to take toward developing and implementing a sustainable transit safety culture.

As a company, we must focus on a model of building a strong safety culture by uniting all ranks of our employees to share a common vision of safe and efficient operations. Our goal of a sustainable transit safety culture is based on the premise that our safety culture should modify human behavior, values, and attitudes about safety. If there is a failure in a plan, policy, procedure, or communication, with our company having a strong safety culture, the safety behavior will align with integrity and engagement to yield a safe response by all. Safety metrics that show our employees how we are performing will help drive an improvement to our overall safety culture.

The safety culture of our organization reflects the perceptions and values that our employees share regarding safety in the workplace. This model has a direct, measurable relationship to organizational performance, efficiency, and outcome. While we have proclaimed a commendable record of safety for our employees and passengers, there is always room for improvement. Reducing the number of incidents through training and

coaching our employees to avoid risky behaviors will help us sustain a strong and vibrant transit safety culture. Ensuring our employees become actively engaged in safe behaviors and following the rules will help.

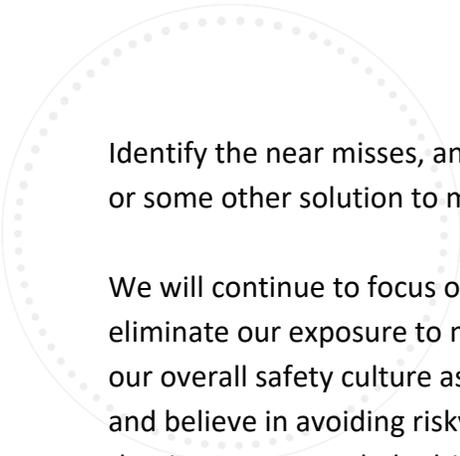
UNDERSTANDING HOW OUR SAFETY CULTURE AFFECTS OUR ACCIDENT PERFORMANCE

It has been suggested theoretically that every company has a safety culture, no matter how good, bad, or indifferent that culture might be. Part of our safety culture performance is measured by the frequency of vehicle accidents we incur. Our company prior vehicle accident history has included fixed object accidents, sideswipes, and overhead clearance accidents, which indicates our operators' lack of space around their vehicle's awareness and aggressive driving behaviors. To summarize, nearly all our preventable accidents had resulted from operator error.

Although most of our company accidents are minor in nature, we know from experience and the Heinrich Accident Model that we train our employees about, statistically speaking, we were increasing our exposure to incurring a major occurrence. The Heinrich 300-29-1 model tells us that for every 300 near misses there will be 29 minor injuries and one major injury. The pyramid representation of the model is as follows:



According to the model, to reduce accidents, we need to reduce the base of the pyramid, namely near misses. As stated previously, nearly all our preventable accidents in the past have been the result of operator error. How then, to reduce the base of near misses?



Identify the near misses, analyze the data, and determine if we need to conduct training or some other solution to mitigate the near misses and to reduce our exposure.

We will continue to focus on the minor issues and near misses, so that we can help eliminate our exposure to major occurrences. This is an instrumental part of improving our overall safety culture as a company. If our employees understand Heinrich's Pyramid and believe in avoiding risky behaviors, our safety performance will improve and with that improvement, help drive an improvement to our company's overall safety culture.

TRAINING REQUIREMENTS

All vehicle operators must undergo required classroom and behind-the-wheel training before entering service. All new vehicle operators are extensively evaluated and must pass numerous testing criteria to ensure they are ready to drive in-service before driving with customers in revenue operations.

▲ OPERATOR TRAINING PROGRAM

Our new vehicle operator training program follows the Transit and Paratransit Transportation Company (TAPTCO) program, an industry leading Transit and Paratransit program that many transit agencies in North America are currently teaching. In addition, we include effective state-of-the-art training programs and procedures that are proven strategies specific to our internal safety processes and to our service. Following this formal training period, operators also participate in an exercise known as cadet route training with a behind-the-wheel instructor. Cadet route training allows our operators to develop their on-route/on-road skills to gain a first-hand perspective and understanding of the route or service to which they will be assigned. The classroom, behind-the-wheel, and route training portions of our training program are described in greater detail below.

Training Calendar

Operators will receive essential training that encompasses rules of the road, defensive driving, safety standards, vehicle features and use, pre-trip and post-trip vehicle inspections, Americans with Disabilities Act of 1990 (ADA) equipment usage, customer service, sensitivity and empathy training, accident and incident procedures, proper communication procedures, and extended time behind the wheel. The future success and retention of excellent vehicle operators starts with an effective and comprehensive training program.

Our training program is a minimum of 96 dedicated training hours for paratransit operators and 120 dedicated hours for fixed route operators. A detailed breakdown of our paratransit operator program is outlined below.

Paratransit Training Overview and Key

Type	Description	Total Hours
CLS	Classroom Instruction	40.0
BTW	Behind-the-Wheel (with 14.5 hours of simulated service)	55.5
TST	Classroom Testing	0.5
Grand Total		96.0

Paratransit Training Breakdown

	Type	Training Topic	Hours
Day 1	CLS	Welcome to MTM Transit and Paperwork	1.0
	CLS	Meet the General Manager and Local Staff	0.5
	CLS	Introduction to Professional Driving	0.5
	CLS	Federal Laws and Regulations	0.5
	CLS	Hazard Communication	0.5
	CLS	Creating a Drug and Alcohol-Free Workplace	1.0
	CLS	Preventing Harassment	0.5
	CLS	Bloodborne Pathogens	1.0
	CLS	Fatigue Management	0.5
	CLS	Wellness	0.5
	CLS	Whistleblower	0.5
	CLS	Safety Best Practices	1.0
Day 2	CLS	Introduction to the Vehicle	3.0
	CLS	Pre-Trip Inspections	1.0
	CLS	Pre-Trip Inspections (Engine and Drivetrain)	0.5
	CLS	Post-Trip Inspections	0.5
	BTW	Pre-Trip Inspections/Post-Trip Inspections Practice	0.5
	CLS	Mirror Adjustments	0.5
	BTW	Mirrors and Reference Points (On Vehicle)	1.0
	CLS	LLLC Defensive Driving or Smith System Program	1.0
Day 3	CLS	Pre-Trip and Post-Trip Inspection Introduction	0.5
	CLS	Pre-Trip and Post-Trip Inspections (Revisited)	1.0
	BTW	Closed Skills Course Introduction	0.5
	BTW	Closed Skills Course	3.0
	BTW	Closed Skills Course	3.0

	Type	Training Topic	Hours
Day 4	CLS	Preventing Distractions (Video and PowerPoint)	1.0
	CLS	Following Distance	0.5
	CLS	Vehicle Emergencies 1	1.0
	CLS	Vehicle Emergencies 2	1.0
	CLS	Sexual Harassment - Respectful Workplace	0.5
	CLS	Accident Procedures (Book and PowerPoint)	1.0
	BTW	On the Road Safe Driving Skills	3.0
Day 5	CLS	Intersections	0.5
	CLS	Railroad Crossings	0.5
	CLS	Local Service Requirements and Fares	1.5
	CLS	Empathy and Customer Service Video from Project Action	0.5
	CLS	Introduction to ADA and Sensitivity (Walking Blindfolded and Riding Bus While Strapped in a Wheelchair and Blindfolded)	0.5
	BTW	On the Road Safe Driving Skills	4.5
Day 6	CLS	Pedestrian and Bicycle Awareness	1.0
	CLS	Preventing Backing Accidents	1.0
	BTW	On the Road Defensive Driving Instruction	4.0
	BTW	On the Road Safe Driving Skills	2.0
Day 7	CLS	Merging, Lane Change, and Passing	0.5
	CLS	Special Driving Condition	0.5
	CLS	Introduction to Customer Service (START Program)	1.0
	BTW	On the Road Safe Driving with Defensive Driving Instruction	6.0
Day 8	CLS	Introduction to ADA and Sensitivity (Using Paratransit Customer Service Applications)	1.0
	CLS	ADA, Lifts, Ramps, Securement, and Service Animals Classroom	1.0
	CLS	Lifts, Ramps, and Securement	3.0
	BTW	Lifts, Ramps, and Securement - Student Passengers	3.0
Day 9	CLS	Map Reading	1.0
	CLS	Conflict/Aggression Management	1.0
	CLS	MTM Transit's Accident and Emergency Procedures	1.0
	CLS	NTI's Warning Signs and NTI's The Mark (videos)	1.0
	BTW	On the Road Safe Driving Skills	4.0
Day 10	CLS	Contract Specific Requirements	1.0
	CLS	Classroom Review	0.5
	TST	Classroom Final Written Exam Test	0.5
	BTW	Safe Driving Skills/Route Training	6.0
Day 11	BTW	Safe Driving Skills/Simulated Service	8.0
Day 12	BTW	Safe Driving Skills/Simulated Service	6.5

Type	Training Topic	Hours
BTW	On the Road - Final Graded Assessment	1.0
CLS	Graduation from Training	0.5
<i>Grand Total</i>		<i>96.0</i>

**The above classroom training exceeds all state standards and contains all required courses.*

Following this formal training period, operators also participate in an exercise known as cadet route training with a behind-the-wheel instructor for a minimum of two days. Cadet route training allows our operators to develop their on-route/on-road skills to gain a first-hand perspective and understanding of the route or service to which they will be assigned.

TRAINING DOCUMENTATION

TRAINING REPORTS

Training evaluations or training reports must be completed whenever an operator trains another operator to include new hire, refresher, or remedial training. This will ensure that all training is documented, identified and any deficiencies or follow up training that is required is completed. All paperwork must be filled out accurately, with detailed information and explanation of training tasks, evaluation of the training and identify any remedial training needed.

2. CUSTOMER SERVICE

CUSTOMER RELATIONS

The importance of good service cannot be underestimated. A point to remember for all operators is that we provide customer service in the form of safe and reliable transportation from one point to another. When a service is provided rather than selling a product, the way our customers are treated determines whether they continue to be loyal customers. It is important to always remember that transportation is a service industry and that our employees are the principal customer service representatives.

CUSTOMER EXPECTATIONS

Customers expect us to provide them with vehicles that are safe, clean, comfortable, and well-maintained. Customers expect our transportation service to be safe, reliable, convenient, and affordable, and our operators to be well informed.

Customers expect our operators to:

- Provide a safe ride
- Deliver and pick-up on time
- Know the best routes to their destination
- Act in a professional manner
- Be knowledgeable about their needs
- Be knowledgeable about different types of mobility aids
- Be familiar with different types of lifts, ramps, and securement systems
- Greet customers
- Always offer assistance for paratransit operations

MTM Transit operators work directly with the public in a professional manner and perform at the front line for the company. As a MTM Transit mobile ambassador, it is the operator's professional customer service skills that will encourage customers to continue to use MTM Transit services.

Operators must always be courteous, reliable, and knowledgeable.

▲ COURTEOUS OPERATORS

- Always give a cheerful “hello” or “good day” when meeting a customer
- Treat the customer with respect, giving them the benefit of the doubt in the event of a disagreement
- Communicate in an appropriate and accurate manner
- Never embarrass a customer
- Always have patience

▲ RELIABLE OPERATORS

- Pick up customers on time
- Provide the appropriate assistance boarding and alighting the vehicle

- Maintain their schedules
- Drive defensively

▲ KNOWLEDGEABLE OPERATORS

- Provide accurate and appropriate information
- Know the appropriate route to take
- Know the proper assistance techniques to use
- Anticipate, remember, and provide the needs of customers

MTM Transit operators are our frontline customer service representatives: MTM Transit Ambassadors. It is up to our operators to fulfill our customers' expectations about our service. MTM Transit expects its operators to meet and/or exceed these expectations.

BENEFITS OF GOOD CUSTOMER SERVICE

The MTM Transit customer is not the only one to benefit from good customer service. Operators who use good customer service skills benefit from increased respect and support, and experience fewer daily frustrations. Good customer service will encourage customers to:

- Be pleasant while in the vehicle
- Be receptive to instructions
- Provide support when dealing with other difficult customers
- Continue to use the service

Customers, operators, and MTM Transit all benefit from good customer service:

- Customers benefit from better service
- Operators benefit from increased customer respect and support
- MTM Transit benefits from increased ridership and customer loyalty
-

PREVENTING PROBLEMS BEFORE THEY BEGIN

Applying the following skills and techniques will make interacting with customers and anticipating their needs straight forward. One of the keys to great customer service is to prevent problems before they begin.

▲ PREPARE FOR THE WORKDAY

- Dress in a professional manner
- Inspect vehicle for any situations that may cause customer complaints
- Ensure that materials and information are available to customers

▲ WELCOME CUSTOMERS

- Let the customer know they are welcome in the vehicle
- Inform the customer of any service delays or problems that day

▲ LISTEN TO CUSTOMER CONCERNS

- When service problems come up, listen to the customers, and understand their complaint
- Offer customer empathy, do not blame others, and offer a solution when possible

▲ THANK CUSTOMERS

- Greet all customers when they get on and off your vehicle
- Let customers know that their business is appreciated
- Build a rapport with customers through courtesy
- Be sure to inform customers of any delays that will occur in coming days

▲ GENERAL GUIDELINES TO REMEMBER

- Greet each customer with a friendly hello and a smile
- Assist customers in a friendly, non-threatening way
- Request that each customer considers his or her own personal safety. Remind customers to “please wear your seat belt” and “watch your step”
- Offer to assist all customers who have mobility impairments
- Always avoid conflict with customers and the public
- If a customer’s concerns cannot be satisfied, refer the customer to management
- Do not deviate from the scheduled stop; Dispatch must approve any changes
- If the operator has any questions in route, they should always call Dispatch

LATE/MISSED TRIP POLICIES

Any late or missed trip must be reported to Dispatch immediately so that the required documentation can be supplied to the client and appropriate actions can be taken.

Operators are required to notify Dispatch prior to experiencing a late trip so that they may try to arrange for another vehicle to make the pick-up on time.

COMMUNICATING WITH PASSENGERS

Be sure the public address system is working correctly prior to placing a bus into service.

While operating a bus in fixed route service, you must be sure to follow the Americans with Disabilities Act of 1990 (ADA) guidelines and announce stops at:

- Major transfer points with other routes
- Major intersections/destination points and points of interest (landmarks)
- Sufficient intervals along the route to permit orientation
- Any stop requested by the customer must also be announced

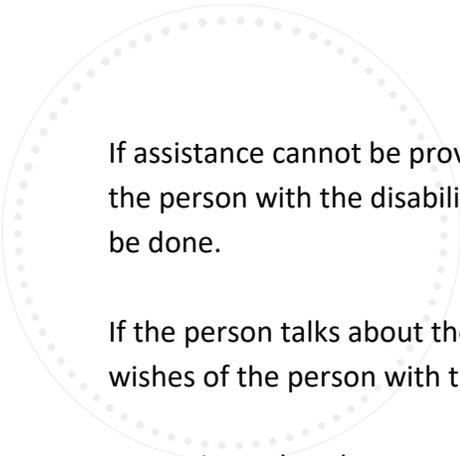
Make sure to program and/or change destination sign information on the exterior and interior displays so that it reflects the current destination and direction for all passengers to see.

▲ SENSITIVITY AND ETIQUETTE FOR COMMUNICATING WITH PERSONS WITH DISABILITIES

Remember that a person who has a disability is a person, just like anyone else.

Do not make assumptions; if a question arises about what to do, how to do it, what language or terminology to use, or what assistance to offer, ask the person with the disability. That person should be the first and best resource.

Assist customers quietly and tactfully. Respect the person's right to reject help or to indicate the kind of help needed. Always tell the person what you will do before you do it; for example, "I am providing my arm to assist you." Never invade a person's personal space without telling them what and why you are doing it. If they refuse, contact Dispatch.



If assistance cannot be provided in the way that is asked, be open in discussing this with the person with the disability. Operators have a right to set limits on what can and cannot be done.

If the person talks about the disability, engage politely without prying. Be guided by the wishes of the person with the disability.

Appreciate what the person can do. Remember that difficulties the person may be facing may stem more from society's attitudes and barriers than from the disability itself.

Be considerate of the extra time it might take for a person with a disability to speak or perform any task. Let the person set the pace in walking or talking.

Speak directly to a person who has a disability. Do not consider a companion or interpreter to be a conversational go-between.

Do not move a wheelchair, crutches, or other mobility aids out of reach of a person who uses them.

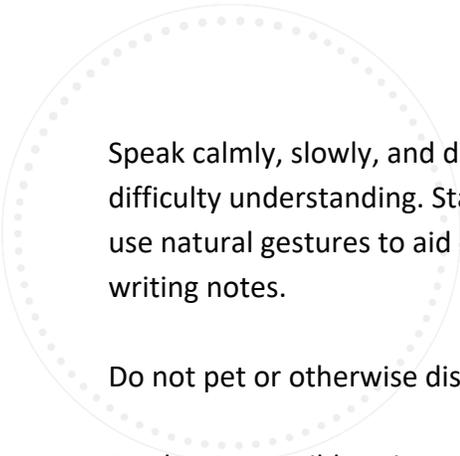
Never start to push a wheelchair without first asking the occupant to do so.

Before deciding whether to push a wheelchair up or down a step, curb, or other obstruction, ask the person if and how he or she wants you to proceed, and be respectful of your own limitations.

Do not lean on a person's wheelchair when talking, it is an invasion of personal space. Do not pat a person in a wheelchair on the head, this can be considered patronizing.

Give full, unhurried attention to a person who has difficulty speaking. Do not speak for the person but give help when needed. Keep encouraging rather than correcting. When necessary, ask questions that require short answers or a nod or shake of the head.

Do not pretend to understand a person with a speech difference when you do not. Do not be afraid to let the person know that you do not understand. Be patient, not only with the person with the disability, but also with yourself.



Speak calmly, slowly, and distinctly to a person who has a hearing problem or other difficulty understanding. Stand in front of the person, speak directly to the person, and use natural gestures to aid communication. When full understanding is doubtful, try writing notes.

Do not pet or otherwise distract dog guides; they are working and must not be distracted.

Be alert to possible existence of architectural barriers in places you may want to enter with a person who has a disability. Watch for inadequate lighting which inhibits communication by persons who have hearing problems.

CUSTOMER INTERACTION POLICY

MTM Transit is committed to treating our customers with respect, dignity, and courtesy. This commitment and the nature of our business require that the relationship between MTM Transit employees and customers be strictly professional. To preserve the safety, security, and trust of our customers and to minimize claims of harassment or the appearance of impropriety, operator interactions with customers must be free from personal relationships, conversations, or contact/conduct that could be construed as harassment, abuse, or otherwise inappropriate.

Examples of prohibited conduct which will result in disciplinary action, up to and including immediate termination, include:

- Sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature
- Threats, abuse, coercion, or intimidation of any nature
- Use of profane abusive or insulting language
- Accepting or offering any gifts, invitations, or favors of any kind
- Discussing personal life or the customer's personal life
- Dating or meeting a customer for personal reasons on or off duty

The reasons listed for discipline and discharge above are examples only and are not meant to include, and do not include all reasons for which an employee may be disciplined, up to and including termination.

Questions concerning this policy should be addressed with immediate supervisors.

3. SAFETY – EMPLOYEES AND PASSENGERS

The health and safety of our employees and passengers is MTM Transit’s foremost business consideration. In keeping with this principle, MTM Transit pledges to:

- Strive to achieve the goal of zero accidents and injuries
- Provide mechanical and physical safeguards wherever they are necessary
- Conduct routine safety and health inspections to find and eliminate unsafe working conditions, control health hazards, and comply with all applicable and [Occupational Safety and Health Administration](#) (OSHA) safety and health requirements
- Train all employees in safe work practices and procedures
- Investigate accidents to determine the cause and prevent similar accidents
- Enforce company safety and health rules and require employees to follow the rules as a condition of employment

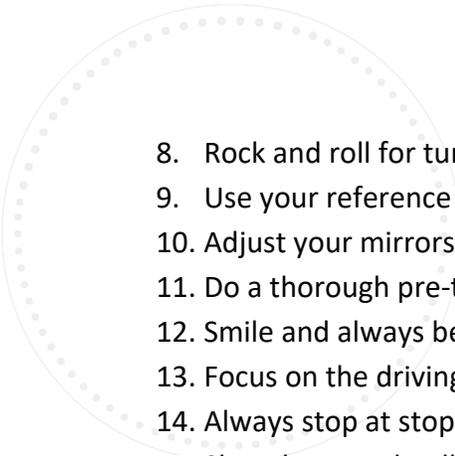
All employees are responsible for their own safety, as well as protecting the safety of their fellow colleagues and passengers of MTM Transit. Employees are expected to participate in the safety and health program, which includes immediately reporting accidents, hazards, and unsafe work acts and conditions to their supervisor.

Failure to follow any safety procedure or guideline will result in a disciplinary action, up to and including termination of employment.

FUNDAMENTAL SAFETY PRACTICES FOR SAFE DRIVING

There are 18 fundamental safety practices that all operators must know and commit to memory before entering service. These 18 safety best practices are at the core of our safe driving principles. These fundamental safety practices make up the foundation of defensive driving and avoiding “at risk” behaviors and help our operators maintain a safe environment for our customers and the motoring public. These practices are:

1. Leave room / Always stay back four seconds
2. Look ahead
3. Look around
4. Communicate
5. Stay within the posted speed limits
6. Be in control, take your time. If late, stay late.
7. Do not back the bus – if you must back, follow G.O.A.L.

- 
8. Rock and roll for turns
 9. Use your reference points
 10. Adjust your mirrors
 11. Do a thorough pre-trip and post-trip and only operate a safe vehicle
 12. Smile and always be polite. Courtesy is contagious
 13. Focus on the driving
 14. Always stop at stop signs
 15. Slow down and pull back for rain, snow, ice, or fog
 16. Get enough sleep, always be alert and awake
 17. Always keep your balance, no rushing and use three points of contact
 18. Never be under the influence of drugs or alcohol

DEFENSIVE DRIVING

Defensive driving helps prevent and reduce damages during collisions with people, vehicles, and fixed objects. It helps us protect people from injury and equipment from damage. MTM Transit teaches the LLLC defensive driving program from TAPTCO.

Police decide who is “at fault” for an accident by determining who has the greatest responsibility for the cause of an accident. Someone “at fault” is responsible for 51% or more of the responsibility.

▲ LLLC PROGRAM

Using the TAPTCO Four Driving Principles of Safety, **Look Ahead, Look Around, Leave Room, and Communicate**, gives you the time and information you need to avoid an accident and be an all-around better operator. It also helps you avoid other vehicles.

Look Ahead

The first principle is Look Ahead. It is not enough to just know what is happening in your immediate environment. Defensive Driving is about knowing what will happen, and you can do so by keeping an eye-lead time of 15 seconds. Scan the road ahead to see any action or potential issues before you reach them to have as much time as possible to react.

Look Around

The Look Around principle, like the Look Ahead principle, has to do with the environmental demands that you perceive. You need to Look Around your vehicle, not just in front. Everything around you is constantly changing: the roadway, the traffic, pedestrians. Change your point of focus every two seconds and check your mirrors every five to eight seconds to see around you and navigate your blind spots. This way, you avoid driving with a fixed stare and stay more alert.

Leave Room

In some ways, the third principle – Leave Room – is the most important to defensive driving. It is the most basic as far as preventing collisions; keep adequate space in between you and other vehicles or fixed objects. It is essential to Leave Room on all six sides of the vehicle: in front, behind, left, right, above, and below. The easiest space to control is the space in front of you. You need to maintain a [three to five second following distance](#) in clear conditions to account for other operators' mistakes.

Communicate

While the first three LLLC Defensive Driving principles are about what information you perceive, - Communicate is about what information you give other operators. You must let other operators on the road know what you intend to do so they can act accordingly. The most basic is your [turn signal](#). Use your turn signal for three to five flashes before turning or changing lanes.

Application of these LLLC principles will greatly improve your driving.

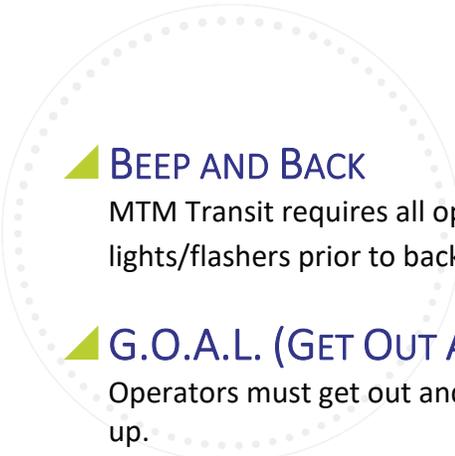
▲ PREVENTABLE VS. NON-PREVENTABLE ACCIDENTS/INCIDENTS

Preventable Accident/Incident

A Preventable Accident/Incident is one in which the operator failed to do everything reasonably possible to avoid or to mitigate damage and/or injuries. This definition is provided by the National Safety Council and is universally accepted in the public transportation industry.

Non-Preventable Accident/Incident

A Non-Preventable Accident/Incident is one in which the operator did everything reasonably possible to avoid, and to mitigate damage and injuries.



▲ BEEP AND BACK

MTM Transit requires all operators to beep their horn and put on their hazard lights/flashers prior to backing their vehicle every time they back up.

▲ G.O.A.L. (GET OUT AND LOOK)

Operators must get out and walk around the vehicle to check for hazards before backing up.

Backing into a spot when arriving will greatly reduce the risk of needing to back up the vehicle when leaving. This can reduce the risk of an accident by as much as 25%.

MTM Transit policy is to have a four-second following distance (1001, 1002, 1003, 1004). During inclement weather and night driving, add additional time. It is the operator's responsibility to add enough time to follow safely in all conditions.

Do not forget that intersections are the most dangerous place to be. Scan every intersection before entering it, and while moving through it.

Cover the brake while going through an intersection.

Look left, right, and left, and forward before moving into an intersection.

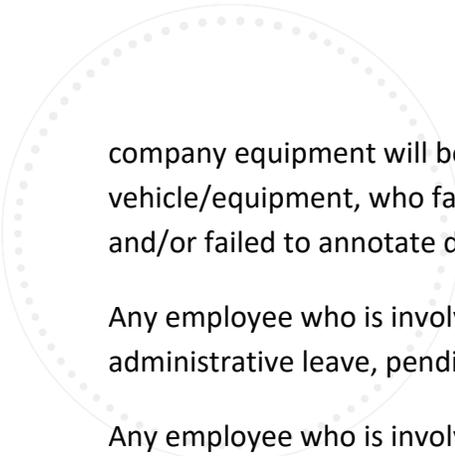
“Rock and Roll” in the seat to avoid blind spots in crosswalks and intersections, most pedestrian accidents happen when operators fail to see people in a blind spot.

Watch for signs of trouble and changing conditions while driving, parked cars, stale lights, crosswalk signs, and pedestrians crossing with, and against the traffic light.

ACCIDENTS

MTM Transit is committed to ensuring the safety of the public, our passengers, and our employees. To ensure we promote the “Safety First” culture within our organization, we have developed a Safety Point Program and Guidelines to ensure compliance and adherence to MTM Transit policies and procedures. All employees who fall within a safety sensitive position are required to abide by these guidelines and are subject to the Safety Points Program, accrual process, and disciplinary structure.

Any work-related accident or incident that involves a MTM Transit employee or equipment will be investigated by the local management. They will determine root cause and responsibility of the accident or incident. If the investigation determines that the accident or incident was “preventable” and is therefore the responsibility of the employee, the employee will be charged with the applicable safety points. Any damage to



company equipment will be assessed to the most recent operator who used the vehicle/equipment, who failed to report the damage as required by company policy, and/or failed to annotate damages on the daily vehicle inspection report.

Any employee who is involved in a major incident (see guidelines below) will be placed on administrative leave, pending investigation.

Any employee who is involved in a preventable accident or incident will be subject to retraining and disciplinary actions, up to and including termination. ***Retraining must be performed before placing the employee back in service.*** This determination will be based on the safety point system and the severity of the accident or incident as defined below.

MAJOR SAFETY INCIDENTS

A major incident is one involving any vehicle which is owned or operated by MTM Transit or occurring on MTM Transit property. For disciplinary actions and reporting purposes, major safety incidents include but are not limited to the following:

- Fatality
- Passenger incident or injury involving improperly securing a passenger
- Preventable roll-away incident
- Unsafe act resulting in a major injury or property damage
- Preventable environmental spills
- Vehicle roll-over/lay-over
- Vehicle fire
- Incidents with employee or operator allegation of negligence of equipment or maintenance failure
- Incidents where employee or operator drug and/or alcohol use may be involved

Major traffic violations include, but are not limited to, any citation that occurs in a company or personal vehicle involving:

- Driving under the influence of alcohol or drugs
- Hit and run accidents (including hit and run of unattended vehicles)
- Open container; possession of a controlled substance
- Failure to stop for or immediately report an accident
- Reckless and careless driving; excessive speeding
- Driving while impaired
- Filing a false accident report
- Homicide, manslaughter, or assault involving the usage of a vehicle
- Driving with a revoked or suspended license
- Attempting to evade a police officer

MINOR SAFETY INCIDENTS

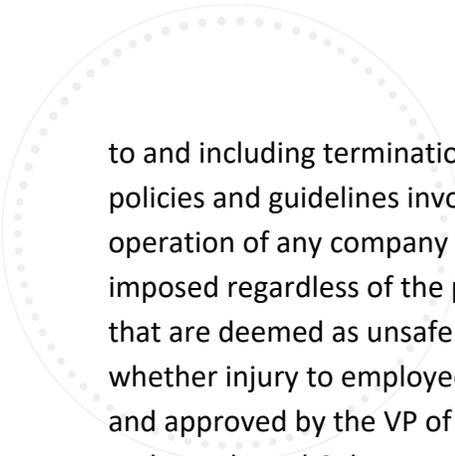
Minor safety incidents are defined as other incidents that do not meet the definition or criteria of a “major” incident.

SAFETY VIOLATION POINT ASSESSMENTS

The table below details specific safety violations and the associated point values:

Safety Violation	Points
Non preventable accident/incident	0
Unsafe maneuvers or acts	1
Traffic camera violations	1
Speeding	1
Failure to perform a complete and thorough vehicle inspection	1
Failure to perform door-to-door ADA service when required	2
Backing incident	2
Conviction of minor traffic violation	2
Preventable accident/incident without any damage	1
Preventable accident/incident with less than \$500 damage to our vehicle	2
Preventable accident/incident with less than \$2,000 damage to our vehicle	3
Preventable accident/incident with less than \$10,000 damage to our vehicle	4
Preventable accident/incident with greater than \$10,000 damage to our vehicle	6
Using a cell phone or non-approved electronic device while operating a company vehicle	6
Failure to stop at a railroad crossing	3
Failing to deliver/hand off customer to approved caretaker when required	6
Failure to immediately report a citation, accident/incident in company vehicle	6
Any preventable roll-away incident	6
Failure to secure/transport a wheelchair and/or mobility device	6
Tampering with, disabling, or otherwise interfering with onboard or other monitoring equipment	6
Receiving a speeding citation for 15mph or above the speed limit in a company vehicle	6
Major preventable accident/incident (examples above)	6
Conviction of a major traffic violation (list above)	6
Hitting a pedestrian with a vehicle	6

Most incidents that occur will be addressed by the Safety Points Program. If a situation falls outside the Safety Points Program, MTM Transit has the right to impose discipline, up



to and including termination, in the event of an unsafe act, failure to follow company policies and guidelines involving safe work practice and/or procedures, or negligent operation of any company vehicle or equipment occurs. These guidelines would be imposed regardless of the point values assessed under the Safety Point System. Behaviors that are deemed as unsafe acts are also subject to disciplinary action regardless of whether injury to employee or passenger occurs. Discipline of this nature will be reviewed and approved by the VP of Operations, Regional VP, Director of Safety Administration, and People and Culture.

▲ MAXIMUM ALLOWABLE STANDARD

MTM Transit's maximum allowable points are as follows:

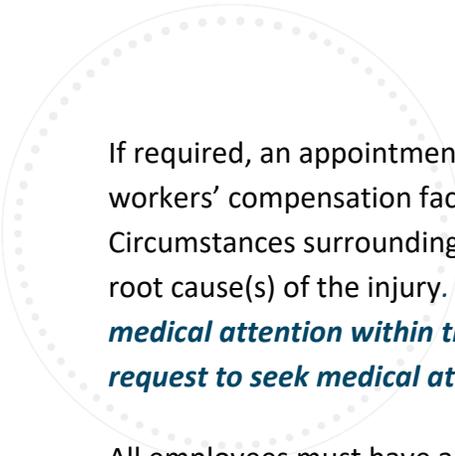
- ▶ **New Employees within Introductory Period:** Receipt of four (4) or more points will result in termination. Any new employee who receives two (2) or more occurrences within the introductory period will result in termination regardless of total point accumulation.
- ▶ **Employees beyond the Introductory Period:** Receipt of six (6) or more points within an 18-month rolling calendar will result in termination. Any employee who receives three (3) or more occurrences within an 18-month rolling calendar will result in termination regardless of total point accumulation.

The Safety Points listed above are subject to change based on contracts and/or CBA within each location.

Accident/Injury

All employees are responsible for their own safety, as well as protecting the safety of their fellow colleagues and passengers of MTM Transit. Employees are expected to participate in the safety and health program, which includes immediately reporting accidents, hazards, and unsafe work acts and conditions to local management.

If you are injured or experience an at-risk occurrence on the job, the incident must be reported immediately to local management. An *Accident/Injury Form* must be fully completed, signed by you and local management, and submitted to the Director of Safety Administration, People and Culture, and Risk Management within 12 hours of the incident. Failure to report an accident will result in assigned safety points, as defined above.



If required, an appointment will be scheduled for you with a physician at MTM Transit’s workers’ compensation facility. You may obtain a second opinion at your expense. Circumstances surrounding an injury will be fully and fairly investigated to determine the root cause(s) of the injury. ***Due to reasonable timeframe issues, if you do not seek medical attention within three business days of incident, MTM Transit may refuse your request to seek medical attention.***

All employees must have a signed Wellness Waiver on file prior to using any on-site MTM/MTM Transit fitness equipment.

▲ ON THE JOB INJURIES

Employee Injury or Employee Exposure

The term “injury” is used to identify both employee injury and employee exposure. Employee injuries need to be investigated and treated like a collision investigation.

OSHA Injury Reporting Rule Change

The Occupational Safety and Health Administration’s (OSHA) Final Rule on Recording and Reporting Occupational Injuries and Illnesses, effective as of December 1, 2016 says that “no employee will be retaliated against or suffer any adverse action for reporting a work related injury or illness”, which implies that no employee can be drug or alcohol tested for reporting an employee injury unless they meet the testing threshold because of their involvement in an accident with passengers or other vehicles or because they meet the drug and alcohol testing guidelines under reasonable suspicion.

All employee injuries are established as being Preventable or Non-Preventable in nature. When establishing whether the injury is Preventable or Non-Preventable, the following will be taken into consideration:

- The type of injury
- Degree of injury; how it occurred
- Pre-injury action of the employee involved

Circumstances surrounding the injury will be fully and fairly investigated to determine the root cause(s) of the injury.

Non-Preventable Injury

Any injury that warrants reporting, yet there were no employee actions that contributed to the injury.

Preventable Injury

Any employee injury in which the employee failed to do everything possible to prevent the injury from occurring.



Note: An employee involved in a preventable injury will be placed on administrative leave pending completion of an investigation and completion of the required retraining. Safety points may be assessed as appropriate.

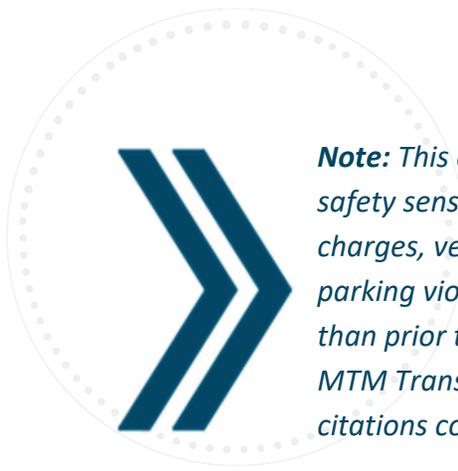
When the investigation is completed, an appropriate action will be taken. Appropriate action may include written warnings, suspension, termination, and/or retraining. When an investigation of a collision reveals that suspension or termination is the correct action, or events are so severe that termination based on the event is appropriate, then prior to acting, operators of company vehicles will be suspended pending a decision regarding termination. All suspensions are served with no pay and there is no PTO time allowed for suspension due to a preventable injury. Any mandated retraining time is payable at the employee's normal pay rate.

Injury Retraining

If an injury is deemed preventable, a certified trainer will perform retraining. The trainer will thoroughly review the injury and its root cause(s) with the employee. The trainer will provide retraining appropriate for the injury type. Employee must be retrained **before** returning to his/her assigned job. Recommended retraining must be determined and documented. A minimum of one (1) hour of retraining encompassing the root cause of the injury must be reviewed with the injured employee. A return to the scene of the injury and discussion with the employee to discuss employee behavior(s) that contributed to the injury and how to prevent future injuries may be held.

General Guidelines

Any employee convicted with a felony or misdemeanor, or any sexually related offense either on-duty or off duty, is required to inform local management immediately, if possible, but no later than prior to the next scheduled work shift.



Note: This does not apply where it conflicts with state laws. Operators and safety sensitive employees are required to report all DUI or DWI related charges, vehicular collisions, and any traffic citations and convictions (except parking violations) received in any vehicle immediately, if possible, but no later than prior to their next scheduled work shift. Citations received while driving a MTM Transit vehicle must be reported immediately. Failure to report known citations could lead to disciplinary actions.

Weapons Free Workplace

MTM Transit strives to provide a safe work environment for all employees. It is a violation of policy for any employee to possess and/or use a firearm or other weapon while on MTM Transit premises and/or on duty. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.

▲ SECURITY AND SAFETY

Security

Only authorized employees of MTM Transit are permitted to access MTM Transit buildings and work areas. This is to ensure employee safety, protect MTM Transit equipment and property, and to comply with HIPAA privacy and security standards.

All visitors to MTM Transit facilities must sign in and out using the visitor log and complete a HIPAA Confidentiality Agreement at the reception or sign in desk. Where appropriate, all visitors should be issued a visitor badge that must be returned at the end of the visit. Visitors are strictly prohibited from being unsupervised while visiting MTM Transit buildings and work areas.

Safety at the Facility

Employees are asked to observe the following regulations:

- Employees using a vehicle owned or operated by MTM Transit are not permitted to transport family or friends at any time
- Park your vehicle only in the employee designated building parking lot(s)
- Do not park in designated visitor spaces
- Do not park in designated handicap spaces unless vehicle is identified as such
- Do not exceed driving at 5 mph either in the in the parking lot entrances or any part of the lot

- Do not have weapons, liquor, or other contraband in your vehicle at work
- MTM Transit cannot be responsible for any damage to vehicle caused by an accident on company property, including parking lots
- MTM Transit will not release copies of videos unless court ordered

GENERAL GUIDELINES FOR VEHICLE OPERATORS

The following guidelines have been established for employees who operate company vehicles:

1. Employees who have a condition which could affect the safe operation of a motor vehicle are prohibited from operating MTM Transit vehicles.
2. All employees operating a MTM Transit vehicle must display a picture ID and must be a minimum age of 21 years.
3. No employee shall operate a MTM Transit vehicle unless in possession of a valid driver's license and certificate of the appropriate class endorsed for passenger transportation required by federal, state, or local government entities, or by the client.
4. All operators must possess a CDL if required for the vehicle and/or client.
5. It is the employee's responsibility to keep such licenses and permits current and valid. An employee who does not have a current and valid license will be suspended without pay to renew such license. Employees will be given no longer than three (3) business days to renew the license. If the appropriate documentation is not submitted within five (5) business days, employment will be terminated.
6. Failure at any time for any reason to maintain a valid driver's license and any certificates required by federal, state, or local laws to operate company vehicles will be just cause for immediate discharge. Similarly, employees who operate MTM Transit vehicles without a valid driver's license or certificate will result in the immediate termination of their employment.
7. As a condition for continuing employment, employees must meet the minimum background check standards listed below. Disqualifiers include:
 - Driving while intoxicated (DWI), or driving under influence (DUI) within ten (10) years of start date
 - Manslaughter
 - Leaving the scene of a collision
 - Driving with a suspended or revoked license
 - Felonies

- Possession of a controlled substance
- Failure to report a collision
- Reckless driving/speed contests or making a false accident report
- Negligent homicide or assault arising out of the use of a motor vehicle
- Careless driving or attempting to elude an officer of the law

8. Any employee arrested, indicted, incarcerated, convicted, or otherwise charged with a felony or misdemeanor, or any sexually related offense either on-duty or off duty, is required to inform his/her supervisor immediately, if possible, but no later than prior to the next scheduled work shift.



NOTE: *This does not apply where it conflicts with state laws. Operators and safety sensitive employees are required to report all DUI or DWI related charges, vehicular collisions, and any traffic citations and convictions (except parking violations) received in any vehicle immediately, if possible, but no later than prior to their next scheduled work shift. Citations received while driving a company vehicle must be reported immediately.*

9. Employees must abide by all federal and state requirements relating to the position they hold at MTM Transit.
10. Employees are required to complete a pre-trip inspection and fill out a DVI Report prior to departing on scheduled runs. Employees are also responsible for ensuring that the full emergency kit and biohazard or spill kit (where appropriate) and all wheelchair securement straps assigned to each vehicle are checked daily, according to the DVI pre-trip procedure.
11. Unless directed by Dispatch, it is a violation of policy for employees to use routes other than the prescribed routes established by the applicable manifests.
12. Employees must be familiar and proficient with all mobility device handling and securement procedures. Failure to properly secure any mobility assistance device or wheelchair, or failure to properly secure any passenger or to properly load, transport, or unload mobility impaired passengers in a company vehicle will result in disciplinary action, up to and including termination of employment.
13. As a condition of employment, all vehicle operators will be required to successfully complete a ride-along evaluation on a yearly basis with a qualified trainer.
14. Moving violations and accidents that appear on an operator's MVR are on a 36-month rolling calendar due to insurance guidelines. (Note that the date used is the "conviction date" NOT the violations date.

****Risk Management and MTM Transit's guidelines for Driver's Motor Vehicle Records are subject to change and will always supersede Safety Guidelines.**

SAFETY AND EMERGENCY PROCEDURES IN A COLLISION

It is especially important to know what to do during an emergency, to know the procedures to follow, and how to contact someone for help.

MTM TRANSIT'S DEFINITION OF COLLISION AND/OR INCIDENT

A collision is contact with any object, vehicle, or person in which any damage has been incurred by either party involved.

An Incident is any collision in which no damage is incurred by either party involved, or any other miscellaneous damage incurred while not operating the vehicle. Incidents also include slips, trips, and falls by customers on the vehicle and during boarding and alighting.

DOT / FTA DEFINITIONS FOR A COLLISION

Collision with vehicles is an incident in which a vehicle strikes or is struck by another vehicle. Collision with people is an incident in which a vehicle strikes a person (suicides not included). Reports to FTA /DOT are made if the collision results in a death, an injury with immediate treatment at a medical facility, or property damage over \$25,000.00. All FTA reportable incidents are referred to as National Transit Database (NTD) reportable incidents and must be reported to the FTA's NTD database by each of our clients or by MTM Transit if the client designates us to report them.

The primary responsibilities of a MTM Transit operator during an emergency procedure is to protect oneself and the customers on the vehicle and then to protect the vehicle and company property.

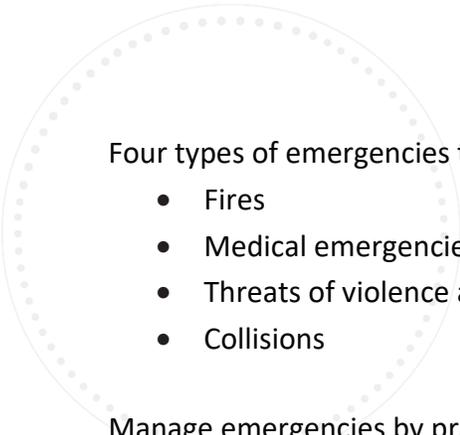
COMPANY PROCEDURES TO FOLLOW AFTER A COLLISION / INCIDENT

1. An incident or collision happens.
2. Vehicle Operator pulls the vehicle over and asks any onboard passengers if they are okay.
3. Incident is called in to Dispatch.
4. Dispatch notifies Police or 911 as needed and depending on severity.
5. Supervisor or Manager investigates if possible after they are contacted by Dispatch.
6. Supervisor contacts the GM or Project Manager.

7. Vehicle Operator puts out warning triangles and takes cell phone pictures of damages and the surrounding area of the incident occurrence.
8. Operator must return to base and complete paperwork with a supervisor or management before leaving work.
9. If a claimant is transported from the scene to a medical facility due to injuries a safety supervisor follows up later at the medical facility to check on their condition.
10. Supervisor or manager contacts Director of Safety Administration
11. Investigation is completed at the scene. The Vehicle Operator will be drug and alcohol tested (if required per FTA testing guidelines).
12. Vehicle Operator completes his/her incident paperwork with Supervisor before leaving work if they have not already been relieved to do so.
13. For all new incidents and collisions, fill out the CBCS loss reporting form and email it to liabilitynewclaims@cbcs.com within 12 hours. *The subject line of your email should indicate if the report is a record only.* Urgent claims with significant injury or major damage during CBCS business hours (8:00 AM – 5:00 PM Central Time) should be called in to Drew Inmon at 563-585-8856. Urgent claims with significant injury or major damage that occur after CBCS business hours should be called into the CBCS afterhours line at 877-241-6121. The afterhours line should only be used to report urgent claims that require immediate assistance. The follow-up accident reporting paperwork needs to be emailed to Risk Management, Senior Manager of Risk Management, and the Director of Safety Administration.
14. All workers compensation claims need to be email reported to FROI@cbcsclaims.com within 12 hours and the paperwork emailed to Risk Management, Senior Manager of Risk Management, Legal and the Director of Safety Administration.
15. All accident and injury paperwork is processed and prepared by safety manager or GM and sent to Risk Management and corporate safety.
16. GM submits paperwork to client.

EMERGENCY MANAGEMENT

If an emergency occurs, operators, as leaders, must take actions necessary to protect customers, themselves, and their vehicle. Fortunately, we are not confronted with handling fires, robberies, and other emergencies every day. No two emergencies are the same. Experience is the only way to gain knowledge of how to behave in an unfolding emergency. In an emergency, immediate action must be taken.



Four types of emergencies that can be encountered are:

- Fires
- Medical emergencies
- Threats of violence and robbery
- Collisions

Manage emergencies by practicing the Seven Basic Emergency Management Steps:

1. Remain Calm
2. Assess the Situation
3. Protect the People, then Property
4. Obtain Help – Call Dispatch
5. Reassure and Assist Customers
6. Secure the Scene
7. Gather Information

Emergency First Aid

If involved in a personal injury collision and no emergency medical personnel is on the scene, try to help the victims. If emergency medical assistance is already on the scene, follow their instructions and pay close attention to the road and traffic control officers.

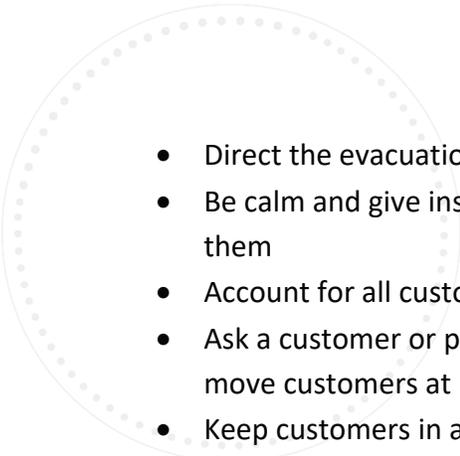
Basic first aid should be used if emergency help is not immediately available. Remember to call 911 only when needed. If basic first aid is required:

- Administer basic first aid
- Try not to move injured persons
- Perform CPR, if necessary, if trained
- Apply pressure to wounds to stop bleeding
- Cover the victim with a blanket or a coat to maintain body temperature and help prevent shock

Emergency Evacuation

The first and most important responsibility is to protect customers and yourself. In case of fire or collision, a speedy evacuation could be critical. If evacuation is required, follow these steps:

- Get everyone's attention and tell them that there is a chance of fire or there is a fire; tell them that they will have to leave the vehicle
- Give clear directions and point where to go
- Verify the direction given is safe

- 
- Direct the evacuation; use hand signals if needed
 - Be calm and give instructions to assist customers off the vehicle; do not to pull them
 - Account for all customers
 - Ask a customer or passerby to lead the group to the designated place; if possible, move customers at least 100 feet from the vehicle
 - Keep customers in a group and as far away from the vehicle and traffic as possible
 - Do not allow smoking near the vehicle
 - If the vehicle has a lift, remember the lift will not work with the power off
 - It may be necessary to cut or remove all customer restraints and leave mobility devices behind
 - It may be necessary to carry or drag a customer with a disability from the vehicle
 - Direct other customers to assist if necessary and possible
 - If someone refuses to leave the vehicle, be prepared to drag them off
 - To eliminate confusion and misunderstanding during radio communications, the use of 10 codes will be minimal; the preferred method for communication is through common spoken word

Any employee who is involved in a major incident will be placed on administrative leave pending investigation.

The operator's contribution to the cause of the injury or collision will be considered when assessing safety points. The Safety Points Policy and/or discipline will apply.

TRANSPORTING PASSENGERS WITH DISABILITIES

The Americans with Disabilities Act of 1990 (ADA) prohibits discrimination and ensures equality of opportunity and access for people with disabilities. It provides the general framework and approach for ending discrimination to people with disabilities.

It is MTM Transit's policy to ensure a non-discriminatory, accessible, and safe transportation service to our passengers with disabilities. Employees are always required to treat all passengers, including those with disabilities, with courtesy and dignity. Violation of this policy is subject to disciplinary action, up to and including termination of employment.

Operators who transport passengers with disabilities should have basic knowledge about the disability of the passenger(s), to ensure that they are transported safely and appropriately.

BLOODBORNE PATHOGENS PROTECTION

The Federal OSHA Bloodborne Pathogen Standard was designed to reduce and minimize the potential for occupational exposure to the Human Immunodeficiency Virus (HIV), the Hepatitis B Virus (HBV), and other human bloodborne pathogens (BBP).

BBP are micro-organisms that live in blood and certain body fluids and have the potential to cause serious diseases. BBP can live and breed in:

- Blood
- Semen and vaginal secretions
- Amniotic fluid in pregnant women
- Any other fluid or body part that is visibly contaminated with blood or body fluids

Some of the BBP that our operators could potentially be exposed to at work include:

- HIV/AIDS – Acquired Immune Deficiency Syndrome. No vaccine or cure is currently available
- Hepatitis B – Also called HBV, most common strain of hepatitis. Vaccine and treatment are available.

To avoid exposure and possible infection, all employees are trained in universal precautions, and are required to attend the bloodborne pathogen training program. The course will inform employees about precautions to be taken to eliminate the risk of infectious diseases that can be contracted through exposure, and the proper methods of handling potential contaminants.

In the event of a BBP situation due to a vehicle accident, onboard injury, or a passenger in need, the following steps should be followed:

- Notify Dispatch that a situation has occurred
- Obtain first aid and assistance by contacting 911 if needed
- Use clean-up kit equipment (latex gloves) around the injured passenger
- Follow the clean-up procedures in the BBP Kit
- When clean-up is completed, wash hands thoroughly with soap, disinfectant, and hot water ASAP

4. AMERICANS WITH DISABILITIES ACT (ADA)

The ADA law is a civil rights law which prohibits discrimination against people with disabilities. By enacting the Americans with Disabilities Act of 1990 (ADA) (Revised 2009, 2011), Congress intended the act to “provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.”

PERSON WITH A DISABILITY

ADA Definition

- Person with a physical or mental impairment that substantially limits one or more major life activities
- Person perceived or regarded as having a mental or physical impairment that substantially limits one or more major life activities
- Person having a record of a mental or physical impairment that substantially limits one or more major life activities

Basic Purpose

- Assures equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities

Employee Training

- Personnel must be trained on ADA guidelines and requirements
- Vehicles and equipment must be operated safely
- Level of service must be provided as required by ADA guidelines and requirements
- All individuals with disabilities must be treated in a respectful and courteous way

Boarding/Alighting Time

- Adequate time must be allowed for boarding/alighting of customers with disabilities
- Adequate time shall include time for customers to get to a seat
- All passengers shall board in no specific order

Lift and Securement Use

- All wheelchairs must be transported if the wheelchair fits in the vehicle
- Securement system is permitted to secure wheelchair
 - Service shall not be denied based on difficulty in securing the wheelchair, or because the securement is not effective or satisfactory according to company policy
- Anyone requesting to use a vehicle lift must be permitted to use the lift to enter the vehicle
- Each securement location must have a 4-point customer restraint system
- If customers are required to use a seat belt restraint, only a customer lap/shoulder restraint (seat belt) can be required
- Individuals may be transferred from wheelchair to vehicle seat
- If necessary or requested, operators must assist with use of:
 - Securement system
 - Ramp
 - Lift
- Assistance must be provided even if the operator must leave his/her seat to help

Maintenance of Lifts

- MTM Transit follows a regular and frequent lift maintenance program
- Operators must report non-operating lifts as soon as possible
- Every effort must be made to repair lifts before the next day of service
- Inoperable lifts must work before vehicle is returned to provide service UNLESS no spare lift is available
- Maintenance must be performed no more than three (3) days in urban areas (>50,000)
- Maintenance must be performed no more than five (5) days in rural areas (<50,000)
- If headways exceed 30 minutes on routes with an inoperable lift, alternative transportation must be provided, which includes but not limited to:
 - Accessible supervisor vehicle
 - Paratransit vehicle
 - Another bus

Mobility Aids and Life Support Systems

- Service animals must be allowed to accompany customers
- Customers must be permitted to travel with life support equipment, including but not limited to respirators and portable oxygen

Refusing Service to Customers with Disabilities

- Service can only be refused, conditioned, or suspended if an individual engages in violent, seriously disruptive, or illegal conduct; behavior that offends, annoys, or inconveniences other customers is not deemed “seriously disruptive”

Fixed Route

- Priority seating must be provided to those with disabilities
- Other customers maybe be asked to vacate their seat for an ADA customer, but they cannot be forced to do so

Permitting Riders to Disembark

- Individuals who use wheelchairs must be permitted to disembark at any stop unless:
 - The lift cannot be deployed
 - The lift would be damaged if deployed
 - Temporary conditions prevent the safe use of the stop by all customers

Announcement of Stops

- Operators must announce stops at:
 - Major transfer points with other routes
 - Major intersections/destination points and points of interest (landmarks)
 - Sufficient intervals along the route to permit orientation of customers
 - Any stop requested by the customer

Identifying Vehicles and/or Customers

- At stops that service more than one route, verbal or other communication is required to identify vehicle and identify customers seeking to ride on their vehicle
- Always facilitate the communication process
- Cooperate with customers in the use of communication devices

5. CUSTOMER SERVICE, WHEELCHAIR/MOBILITY ASSISTANCE, SECUREMENT, AND SENSITIVITY

The objective of this training is to provide instructions on how to maneuver customers using mobility devices, operate the wheelchair lift, board ambulatory customers using the lift, transport customers using mobility devices, and use sensitivity in interactions with customers.

SAFETY RESPONSIBILITY

As providers of transportation services to individuals utilizing mobility devices, it is our responsibility to ensure that all necessary steps are taken to ensure customer safety. This means following all the rules and procedures pertaining to mobility device securement. There is no room for exceptions when it comes to maneuvering, securing, and transporting mobility devices. You must follow the MTM Transit policy.

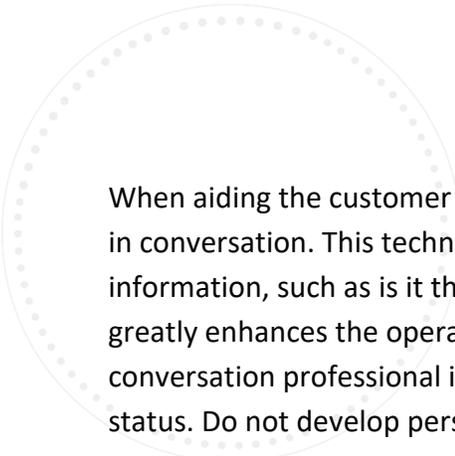
PERSONAL SPACE ISSUES/COMMUNICATION

When providing service to customers in mobility devices, communication is a key to our success. Communication enables us to do two things:

1. Obtain information that allows us to safely assist the customer without violating independence
2. Helps us develop a trust factor between the vehicle operator and the customer

When assisting customers in mobility devices, it is important to remember to speak directly to the customer. Be sure to address the customer directly – not the caregiver. Making direct eye contact with the customer goes a long way toward establishing trust. In addition, if the customer is non-verbal, it is essential to observe their response (facial expressions, hand gestures, etc.) to gauge their overall comfort level.

Communicate every action beforehand; sudden movements can be disconcerting for any customer, particularly those in mobility devices. If every action is communicated and approved by the customer, the possibility of misinterpretation will be limited. Develop the habit of asking permission before touching the mobility device. This shows respect for the customer's right to choose. It should never be forgotten that the mobility device is an extension of the customer. Touching the mobility device without permission is no different than touching the customer without permission.



When aiding the customer to or from the vehicle, it is a good idea to engage the customer in conversation. This technique gives you the opportunity to gather important information, such as is it the customer's first time using the service. This information greatly enhances the operator's ability to provide safe, efficient service. Be sure to keep conversation professional in nature. Avoid discussing personal details such as marital status. Do not develop personal relationships with customers.

When assisting customers onto the lift, it is important to communicate every step in the process. A customer in a mobility device has the right not to be controlled by another person. This is true even for the simple act of reaching around to lock the mobility device brakes. This act has the potential to cause discomfort if the customer is not prepared for the action. Remember, if communication is used prior to action, there will be less potential for misinterpretations.

Securing mobility device customers into securement positions is where the greatest number of personal space issues comes into play. Once again, communication is the key to success. The most sensitive aspect of this procedure is the securement of the lap restraint. It is important to inquire as to whether the customer can secure their lap restraint on their own before making any attempt to do this for them. If you are aware that the customer is not able to secure the lap restraint, it is critical that you bring the belt to its fully extended position as you place it around them to avoid contact with sensitive areas. Along with communication, this technique will help ensure that the operator's intentions are clear.

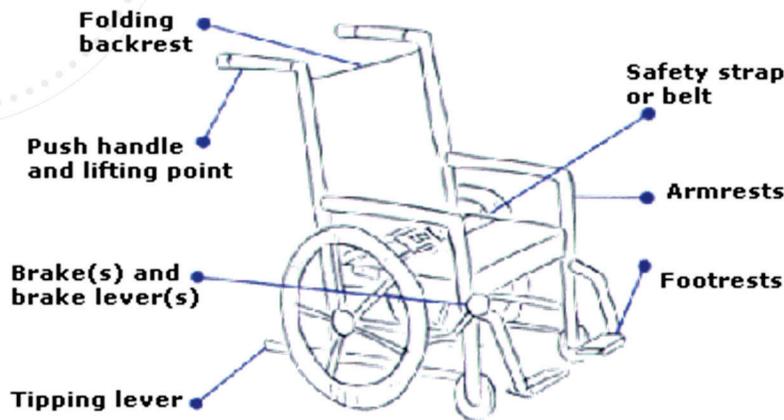


***Safety Note:** No matter if the customer or the operator secures the lap restraint, it is the responsibility of the operator to ensure the restraint is secured properly.*

These communication techniques should be used no matter what the perceived level of disability the customer may be. Simply because a customer may be severely disabled does not necessarily mean they are not aware of their surroundings. Communication is the key to any successful trip. If dialogue is continuous, the operator will leave little room for the customer to misunderstand the intent to respectfully perform his/her job duties.

MOBILITY DEVICES

COMPONENTS OF A WHEELCHAIR



MANEUVERING CUSTOMERS IN MOBILITY DEVICES

Body Mechanics

Vehicle operators can safely maneuver mobility devices without injury by using proper body mechanics. The following steps apply:

1. Be sure to be directly behind the wheelchair before attempting to move it
2. Position feet shoulder distance apart, with one foot slightly forward
3. Always push instead of pulling
4. Use leg muscle instead of back muscle

Choice of Path

It is important to choose a good path when maneuvering wheelchairs and other mobility devices. Choose the best path for maneuvering. Smooth, firm, dry, and clean paths make maneuvering a wheelchair or mobility device easier. When possible, avoid surfaces that are rough, soft, wet, slippery, or dirty.

Curbs

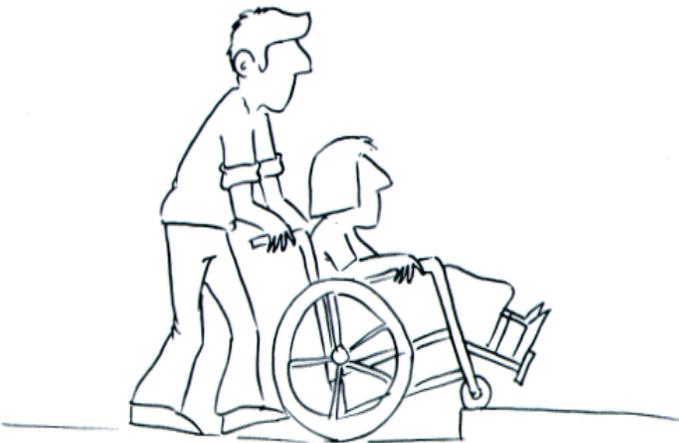
Maneuvering wheelchairs and other mobility devices up and down curbs is dangerous if the proper procedures are not used. If the service requires that customers be transported up and down steps, be sure you use the actions necessary to accomplish this task safely.

Maneuvering Up a Curb

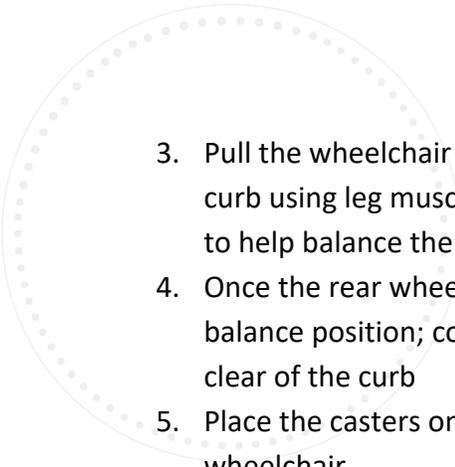


1. Position the wheelchair facing the curb
2. Slowly push foot down on the tipping lever while pulling down and back on the push handles
3. Pull back far enough until the wheelchair is balanced on its rear wheels and the caster wheels are higher than the curb
4. Roll the wheelchair forward until both rear wheels are in contact with the curb
5. Lower the wheelchair until the casters touch and they are straight
6. Lift up on the push handles and push the wheelchair forward using the strength of legs, not back

Maneuvering Down a Curb



1. Position the wheelchair facing away from the curb (back to the street); lean into the wheelchair
2. With hands gripping the push handles, carefully place one foot onto the lower surface

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3. Pull the wheelchair towards your body, slowly backing the rear wheel down the curb using leg muscles; do not use the strength of arms or back, hips may be used to help balance the wheelchair
 4. Once the rear wheels are on the lower surface, pull the wheelchair into a neutral balance position; continue to guide the wheelchair backwards until the casters are clear of the curb
 5. Place the casters onto the ground straight and continue maneuvering the wheelchair



Safety Note: Always look for alternatives to maneuvering over curbs and steps, even if it means walking a bit further.

Ramps

When maneuvering chairs and other mobility devices up and down ramps, operators should always be positioned on the downside at the customer's back. This will allow the chair to be pushed forward up the ramp and back the chair down the ramp.

Multiple Steps

We are to do everything possible to avoid maneuvering customers in mobility devices up and down multiple steps. If a situation is encountered that calls for maneuvering a customer in a mobility device up or down more than one step, contact Dispatch for assistance. Under no circumstances is the vehicle operator to attempt to maneuver up or down multiple steps without assistance.

WHEELCHAIR LOADING PROCEDURES AND LIFT OPERATION

LOADING CUSTOMERS ONTO THE WHEELCHAIR LIFT

MTM Transit strongly recommends that customers using mobility devices should face away from the vehicle when using the customer lift. The customer can elect to ride the lift in any position they choose. Loading facing away from the vehicle provides the following advantages:

1. Most of the weight is concentrated toward the supported end of the platform; therefore, there is less sway
2. There is less chance that the feet of the customer will get caught in the gap plate as the lift rises to floor level

3. The vehicle operator can maintain better control by having access to the hand grips of the wheelchair
4. The wheelchair is in proper position to be rolled straight backing into the securement position in the vehicle

WHEELCHAIR LIFT OPERATION

These are the steps that should be followed when using the customer lift:

1. Position the vehicle on a level surface where the lift rests on the sidewalk whenever possible
2. Shift vehicle into park
3. Set the emergency brake
4. Turn on the emergency flashers
5. Turn control switch for the customer lift to the lift position (varies depending on model)
6. Ensure the customer is clear of the lift and that their wheelchair brakes are set
7. Open the lift doors, unfold the lift, and lower the lift to the ground
8. Standing in front of the wheelchair, push the wheelchair onto the lift and set the brakes; make sure the chair restraint is in the up position on the lift platform
9. Secure the restraining belt on the lift (if equipped with one)
10. Raise the lift a couple of inches off the ground and check end safety flap to ensure it is locked
11. Raise the lift to the floor level with one smooth operation
12. Release the brakes and push the wheelchair over the threshold partially into the vehicle and reset the brakes.
13. Re-enter the vehicle
14. Unlock the brakes on the wheelchair, keeping a hand on the wheelchair
15. Pull the wheelchair back into the vehicle, off the lift
16. Once inside, move to the front of the wheelchair and guide it into position for securing
17. Lock the brakes when position properly and proceed to secure the chair with the securement system. Four belts must be used to tie down the mobility device and the seat belt and shoulder harness must be used to secure the passenger
18. Before returning to the operator seat, check all belts and securement points for tightness and proper alignment

MANUAL LIFT OPERATION

If the power to the lift malfunctions, it is important that vehicle operators know and understand how to manually operate the lift. This procedure for manual operation varies depending upon the manufacturer and model of the lift in use. Please refer to your trainer and vehicle for instructions.

SECURING CUSTOMERS IN MOBILITY DEVICES

Four Point Securement Process

All mobility devices must be secured using a four-point securement system. Two of the securement straps must be ratchet types. Straps must be fastened to the frame of the chair; never fasten straps to the wheels.

1. Attach one end of the securement strap to the rear floor and secure the other end to a solid part of the wheelchair frame as high as practical (the goal should be to form a 45-degree angle between the straps, the floor, and the chair).
2. Tighten the straps while pulling the chair toward you. Move to the other side and secure the straps in the same manner.
3. Pull the wheelchair in the direction of the securement tightening the strap until all the slack is removed.
4. Test for tightness by trying to move the wheelchair back and forth. The back-and-forth method allows for a backward and downward pull on the mobility device.
5. After the rear belts are secure, attach a strap to the front track on each side of the wheelchair. Attach these straps to a solid part of the frame in front of each side and pull them equally tight.
6. Check for any loose fittings, slack, or connections that may not hold. Remove the slack, and if necessary, repeat the process to ensure the securement straps are properly placed.
7. Ask to have the customer use the lap/shoulder restraint.

Powered Wheelchairs

The same principals apply for powered wheelchairs. Please ask the customer to disengage all switches and belts before loading the wheelchair onto the lift. To disengage a powered chair, move the belt release handle on each side forward or backward (depending on model). The belts should release from the pulleys and the wheelchair will be inoperable. Ask to have the customer use the lap shoulder restraint.

Some powered wheelchairs cannot be disengaged. When this situation occurs, extra caution must be taken to turn off the power and set the brakes firmly once the power wheelchair is on the lift.

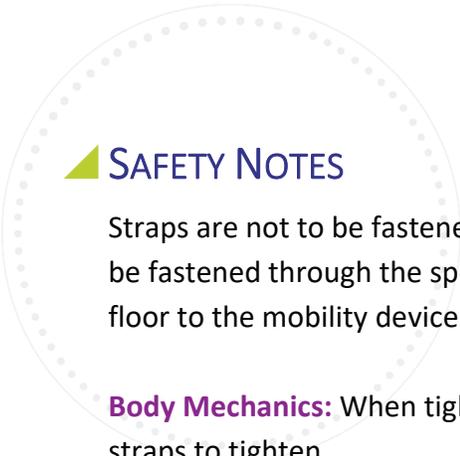
Three Wheel Mobility Devices

While attempting to secure a three-wheel mobility device, disengaging the power on most models causes the brakes to automatically come on and it will not move. When attempting to load the customer and the mobility device onto the lift, ask the customer to back the mobility devices onto the lift.

1. Place a lap restraint belt, if equipped, around the customer and the seat before loading onto the lift. Follow the lift securement procedures and lift in one smooth motion.
2. Once the lift has been raised, maneuver the mobility device firmly against the wall or folded seat area on the vehicle.
3. Lock the swivel seat of the mobility device in the forward-facing position.
4. Attach two securement straps to the floor at the rear of the mobility device at a sufficient distance from each side to provide equal pull to the left, right, and rear.
5. Loop these straps through the securement points provided on the mobility device or the seat post near the base.
6. Pull the straps tight.
7. Move to the front of the mobility device and attach the front securement straps to the floor a sufficient distance from the mobility device providing equal pulling from each side.
8. Loop the straps through the securement space provided, or if necessary, place around the steering post. Do not place the straps above any flexible joints which may be part of the steering post.
9. Pull the front straps tight to ensure equal pressure in all four directions.
10. Ask to have the customer use the lap/shoulder restraint.

Other Powered Mobility Devices

If encountering mobility devices that have more than four wheels, or less than three wheels, the same rules apply and are required as with other devices – use a four-point securement to a fixed location on the device and ask to have the customer use the lap/shoulder restraint. For any questions when encountering a new device call Dispatch for additional assistance.



SAFETY NOTES

Straps are not to be fastened to removable parts of the mobility device, nor are they to be fastened through the spokes of the wheels. Straps should never be crossed from the floor to the mobility device.

Body Mechanics: When tightening straps, kneel, keep back straight, and pull upon the straps to tighten.

Never attempt to lift a mobility device; they are designed to roll.

Shoulder Harness: If the vehicle is equipped with a shoulder harness, it should be secured on all customers using mobility devices.

Transferring Customers from Mobility Devices into Seats

Some customers may be capable of transferring from their mobility device to a seat in the vehicle. Customers who choose to transfer may do so, provided they can do it without assistance from the vehicle operator.

The mobility device must be stored and secured in a safe location by the vehicle operator. This can be accomplished by securing the empty device as if it were occupied.

When transporting customers in mobility devices, vehicle operators need to remember the following facts:

1. Centrifugal force (outwards) is exerted on wheelchairs when the vehicle goes around a corner. The occupant of the chair may feel he or she is being pulled forward out of the chair, or that the chair may tip backward, depending upon the direction of the turn.
2. Slow, steady turns must be made; 5 MPH is maximum speed on a turn. Do not brake in the turn process. Brake before the turn then lightly accelerate during the turn.
3. Wheelchairs pick up road shock each time the vehicle hits a bump. Care and judgment are needed to avoid unnecessary bumps or potholes. If a road is unavoidably bumpy, slow down and ease the vehicle through.
4. Stopping and starting the vehicle exerts pressure on the sides of the wheelchair and its occupant.
5. Fast movement in either direction may bruise or injure a customer if they are thrown sideways against the armrest of the wheelchair.

6. Vehicle starts should be steady and even. Stops should begin back far enough to prevent the customer from feeling a hard backward movement.

The bottom line for driving a vehicle carrying mobility devices is to strive for smoothness and safety. Smoothness is a product of proper speed for all conditions. Vehicle operators should place safety first and schedule second to avoid driving too fast for safe transportation of customers in mobility devices.

Ambulatory Customer Boarding Using the Lift

Any person requesting the use of the lift must be allowed to use it. When ambulatory customers request boarding, the following steps are to be followed:

1. The vehicle should be positioned so the lift will rest on level ground
2. Instruct the customer to stand on the lift; we recommend that customers stand and hold onto the grab rails, facing the vehicle
3. Be sure to notify the customer before raising the platform
4. Notify the customer that your hand will be placed just behind their back as a safety precaution while operating the lift, to prevent a fall

Bus Kneeling Procedure

All vehicles equipped with a kneeling feature should be used in the following manner:

- Place the vehicle in park and set the parking brake
- The vehicle should be positioned so it will be above level ground
- Notify the customer prior to lowering the height of the coach
- Be sure to lower the vehicle completely before allowing customers to board
- Raise the bus back to normal height prior to moving bus and resuming travel

Wheelchair/Mobility Device Securement Policy

The objective of this policy is to have “zero” injuries and incidents to our customers from unsecured or improperly secured mobility devices.

RESPONSIBILITY

The procedures discussed in this policy are to be considered as the minimum acceptable standard to be followed. It is the responsibility of all vehicle operators to ensure that all mobility devices are secured from uncontrolled movement prior to placing the vehicle in motion.



It is also the responsibility of local management team to advise, instruct, and enforce the policy as well as provide the necessary materials and training to enable employees to adhere to this policy.

POLICY

The customers who ride in our vehicles depend on us for safe, caring, reliable transportation. Therefore, vehicle operators are to ensure that all mobility devices (wheelchairs, 3-wheel devices, etc.) are secured from uncontrolled movement prior to placing their vehicle in motion. All mobility impaired customers using such devices are to be loaded, secured, and transported and unloaded according to company policy and training.

DISCIPLINARY ACTIONS

Any vehicle operator who fails to perform to this policy in securing, loading, transporting, or unloading any customer using a mobility device will be subject to discharge regardless of injury or non-injury to any customer. All incidents of this type will be investigated and reviewed prior to any action taking place. *See more about this in the safety points section.*

APPENDICES

- Appendix A** Sample Operator Job Description
- Appendix B** Fundamental Safety Practices Quiz
- Appendix C** Training Acknowledgement

APPENDIX A – SAMPLE OPERATOR JOB DESCRIPTION

JOB TITLE:	Driver (Operator)
CLASSIFICATION:	Non-Exempt (hourly)
ORGANIZATION:	MTM Transit
LAST UPDATED:	03/26/2020

Position Summary

The **Driver (Operator)** is responsible for providing Paratransit and/or Non-Emergency Transportation services in a safe and reliable manner. The **Driver** will ensure the customer and client receive the highest degree of courtesy and professionalism. This work is done in compliance with the procedures defined by the client and in conformance with company procedures.

Essential Functions

- Provide safe and reliable transportation
- Demonstrate excellent defensive driving skills
- Provide excellent customer service to both internal and external stakeholders
- Must assist with passenger loading and unloading from vehicle
- Must assist with any mobility device and securement as required for safety protocols
- Ensure the on-time pick-up and drop off of the customer
- Demonstrates understanding and sensitivity to the needs of older adults and individuals with disabilities
- Complete thorough vehicle pre-trip, post-trip, and DVI inspections as required
- Complete paperwork as required
- Utilize tablets or electronic devices as required

Knowledge, Skills, and Competencies

- Ability to use a tablet, GPS, two way radio, or other electronic device
- Ability to maintain high level of confidentiality
- Ability to communicate with others and comprehend instructions
- Ability to understand highway traffic signs, signals, maps, manifests, and schedules
- Ability to obtain knowledge of FTA, ADA, and DOT regulations
- Familiarity with the main roadways and major highways in the service area

Required Education and Experience

- High school diploma or G.E.D. equivalent
- Must meet the minimum age requirements as specified by the contract
- Possess a continuously valid US driver's license for the length of time required by the contract
- Possess valid authorization to work in the United States
- Must possess the required type of driver's license per the client contract
- No suspensions, DUI, or citations in length of time specified by the contract
- Must be able to pass DOT physical and pre-employment drug/alcohol screening
- Must pass criminal background check investigation

Working Conditions

- This job operates in a professional work environment
- This role requires driving a variety of vehicles including but not limited to vans and cutaway buses
- Normal setting for this position is outdoors and/or driving a video/GPS monitored vehicle
- May be subject to adverse weather conditions during times of travel, transfer of clients, and vehicle inspections
- Exposure to a physical environment, which involves dirt, odors, noise, weather extremes or other elements
- Driving during all hours of the day including at night and low levels of visibility

Physical Requirements

- Requires sitting in and operating a vehicle for prolonged periods of time
- Requires close visual acuity when operating a computer and motor vehicle
- Requires pushing, pulling, bending, twisting and lifting a minimum of 50 pounds
- Must be able to move within and around a vehicle, including kneeling, stooping, bending, and squatting
- Must be able to push, pull, and secure a wheel chair or other mobility device with or without individuals of various statures and sizes

Supervision

- This position does not involve supervision of direct reports

Acknowledgement

I have read and understand my position description and certify that I understand the requirements of the essential functions and duties of the position and will fulfill the stated expectations:

____ without accommodations

____ with the following accommodation(s): _____

*Equal Opportunity Employer: MTM is an equal opportunity employer.
If you are in need of accommodations, please contact People & Culture at (636) 561-5686.*

Employee Name (print): _____

Employee Signature: _____ Date: _____

Supervisor Name (print): _____

Supervisor Signature: _____

Title: _____ Date: _____

This job description in no way states or implies that these are the only duties to be performed by the employee occupying this job. Employees may be required to follow other job-related instructions and to perform other job-related duties as requested, subject to all applicable state and federal laws. Certain job functions described herein may be subject to possible modification in accordance with applicable state and federal laws.

Original: Human Resources
Cc: Employee's Supervisor
Employee

APPENDIX B - FUNDAMENTAL SAFETY PRACTICES QUIZ

Fundamental Safety Practices Quiz

Name: _____

1. What does an operator use to keep a vehicle centered in the roadway or to position a vehicle 6 to 12 inches from the curb, to avoid an accident when making a turn, and to avoid striking objects when backing?
 - A. Reference Point
 - B. Lucky Charms
 - C. Hindsight
 - D. A Spotter
2. According to company policy, the maximum allowable vehicle speed when making a turn is:
 - A. 5 MPH
 - B. 35 MPH on right turns and 25 MPH on left turns
 - C. 55 MPH
 - D. No Specific Speed
3. "Rocking and rolling" in the operator's seat prior to making a turn means to what?
 - A. Turn the vehicle radio to 97.3
 - B. To move around in the operator's seat to see around obstacles and eliminate blind spots
 - C. To imitate Elvis by swiveling one's hips
 - D. It is a slang term for listening to CD's while driving
4. (Heinrich Theory) 300:29:1 means what?
 - A. For every 300 unsafe acts or near misses, there are 29 minor accidents, and 1 catastrophic accident
 - B. Theory of light speed vs. sound speed
 - C. For every 300 hours, 29 babies are born
 - D. 330

5. In the spaces below, write out the four principles of Defensive Driving from TAPTCO's LLLC program.

6. The purpose of mirror adjustments is to enable the operator to:

- A. See adults and other pedestrians around the vehicle
- B. See vehicles and objects around the vehicle
- C. Eliminate blind spots around the vehicle
- D. All the above

7. According to MTM Transit policy, the minimum allowable following distance is:

- A. 2 seconds
- B. 2 seconds, except at high speeds where 6 seconds is allowed
- C. 4 seconds
- D. 30 seconds

8. While driving, following distance can be measured by:

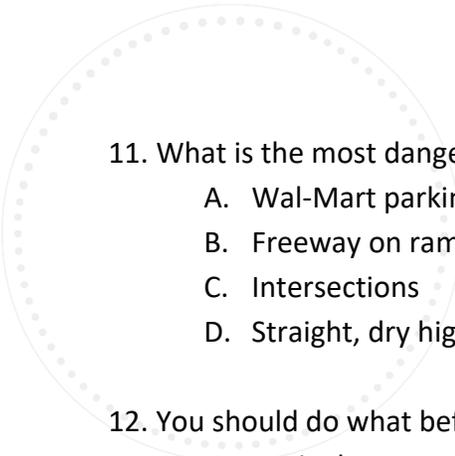
- A. The number of tractor trailer lengths between cars
- B. Counting the seconds for when the vehicle immediately in front of you passes a fixed object until you pass the same fixed object
- C. Adjusting your speed so that each desired second of following distance is equal to 10 MPH (for 2 seconds, drive 20 MPH)
- D. Counting to 10 and dividing by 2

9. Stopping distance is increased by:

- A. Following distance
- B. Adverse weather conditions
- C. Line of sight
- D. Traffic conditions

10. How often are pre-trip vehicle inspections performed?

- A. Daily
- B. Prior to a vehicle going into service
- C. Every 1500 miles
- D. Monthly

- 
11. What is the most dangerous location for a vehicle to be?
 - A. Wal-Mart parking lot
 - B. Freeway on ramps
 - C. Intersections
 - D. Straight, dry highway

 12. You should do what before entering an intersection?
 - A. Let it clear
 - B. Proceed only after the light turns yellow
 - C. Stop, look, and listen
 - D. Look in the rear-view mirror

 13. A Space cushion gives the operator time to:
 - A. Hide
 - B. Take defensive action
 - C. Take evasive action and back up
 - D. Call Dispatch and ask for directions

 14. When approaching an intersection, always expect:
 - A. Trouble
 - B. The police
 - C. An ambulance
 - D. A bus stop

 15. To cover your brake means to:
 - A. Make sure that the brake pedal is covered by a rubber pad
 - B. Place your foot over the brake in anticipation of the need to brake
 - C. Refers to a type of maintenance performed on your vehicle

 16. To eliminate blind spots an operator should:
 - A. Rock and roll
 - B. Get out and walk around
 - C. Call Dispatch and get a spotter
 - D. Put sunglasses on

17. To be safe, an operator should always drive:

- A. Offensively
- B. Defensively
- C. Slow
- D. Fast

18. To drive defensively means that an operator:

- A. Anticipates that other operators will do what is right or safe
- B. Anticipates that other operators will do what is wrong or unsafe
- C. Does not anticipate what other operators will do
- D. Is only concerned with his or her own driving

19. List the Five Areas of a pre-trip inspection

_____	_____
_____	_____

20. Safety means _____ of _____ from unintentional harm.

Fundamental Safety Practices Questionnaire – Answers

1. A
2. A
3. B
4. A
5. Look Ahead
Look Around
Leave Room
Communicate
6. D
7. C
8. B
9. B
10. B
11. C
12. A
13. B
14. A
15. B
16. A
17. B
18. B
19. Operator (Driver) Compartment
Customer Compartment
Brake Check
Exterior
Tires / Wheels
20. Freedom/Risk

APPENDIX C – TRAINING ACKNOWLEDGEMENT

Employee Safety and Training Manual – Training Acknowledgement

I certify that, as an employee of MTM Transit, I have read this manual and understand my responsibilities in the following areas:

- Safety related to MTM Transit employees
- MTM Transit’s Safety Culture
- Heinrich’s Pyramid – 300-29-1
- LLLC Defensive Driving
- 18 Safe Behaviors
- Customer Service
- Customer Interaction Policy
- Emergency Procedures/Communications
- Radio Communication Policy
- Fundamental Safety Practices
- Defensive Driving
- Americans with Disability Act (ADA)
- Customer Service/Wheelchair and Mobility Assistance/Securement/Sensitivity
- Map Reading and Manifests
- Passenger Count
- Transfers
- Fare Handling

I further certify that I have read and that I understand the MTM Transit policies contained in both the Employee Handbook and the TAPTCO New Operators Manual.

I understand that revised information may supersede, modify, or eliminate existing policies, rules, and benefits at any time.

Signature: _____

Print Name: _____ Date: _____



Drug and Alcohol Policy

All Transit Locations
(with the exception of Hamilton County, OH)
Zero Tolerance



2023

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1. CHIEF EXECUTIVE OFFICER STATEMENT

MTM Transit is dedicated to providing safe, dependable, and economical transportation services to our patrons. MTM Transit's employees are a valuable resource, and we want to provide a safe, healthy, satisfying working environment. In meeting these goals, it is our policy to:

- Assure employees are not impaired in their ability to perform assigned duties in a safe, productive, healthy manner
- Create a workplace environment free from the adverse effects of drug and alcohol abuse or misuse
- Prohibit the unlawful manufacture, distribution, dispensing, possession, or use of controlled substances; it is the responsibility of the employee to inform MTM Transit of any Federal or State criminal drug statute convictions in writing, within five calendar days of conviction.
- Encourage employees to seek professional assistance when substance abuse adversely affects their ability to perform their assigned duties; employees may access such assistance by contacting our Employee Assistance Program (EAP) at (888) 311-4327.

We established this policy to comply with the Federal Transit Administration regulations codified as 49 CFR Part 655, as amended and USDOT regulations codified as 49 CFR Part 40, as amended. Additionally, the USDOT published 49 CFR Part 32, implementing the Drug-Free Workplace Act of 1988, which requires the establishment of drug-free workplace policies and the reporting of certain drug-related offenses to the Federal Transit Administration (FTA).

Policy provisions authorized by MTM Transit are identified by italicized and bolded (***MTM Transit Policy***) throughout this document. All other policy provisions are implemented under the authority of the United States Department of Transportation (USDOT) and the FTA.

Per MTM Transit's authority, violation of this substance abuse policy will result in termination of employment and/or exclusion from hire.

This policy is effective on October 1, 2022.

Name: Alaina Maciá

Title: President and CEO

Signature: 

Date: October 1, 2022

2. COVERED EMPLOYEES

- Operating a revenue service vehicle, whether in or out of revenue service
- Control the movement/dispatch of a revenue service vehicle
- Perform maintenance on a revenue service vehicle or equipment used in revenue service
- Carry a firearm for security purposes
- May perform any of the above safety sensitive functions in a supervisory or training role.

This policy is applicable to the following positions within MTM Transit:

- ▶ General Manager
- ▶ Operations Manager/Safety Manager
- ▶ Road Supervisor
- ▶ Dispatch Manager/Supervisor
- ▶ Dispatcher
- ▶ Maintenance Manager
- ▶ Mechanics
- ▶ Utility Personnel
- ▶ Drivers

3. USDOT/FTA PROHIBITED DRUG CLASSES

Consumption of these drugs is prohibited at all times.

- ▶ Amphetamines
- ▶ Cocaine
- ▶ Marijuana
- ▶ Opioids
- ▶ Phencyclidine (PCP)

4. PRE-EMPLOYMENT DRUG & ALCOHOL BACKGROUND CHECKS

In accordance with 49 CFR Part 40.25, MTM Transit must make and document good faith efforts to perform drug and alcohol background checks for all applicants applying for a safety-sensitive position and all current employees applying for transfer into a safety-sensitive position. Testing information will be requested from each of the applicant's previous DOT covered employers during the two years prior to the date of application. MTM Transit must obtain the applicant's written consent for the release of their drug and alcohol testing information from their previous DOT covered employers to MTM Transit. Applicants refusing to provide written consent are prohibited from performing safety-sensitive functions for MTM Transit.

Safety-sensitive applicants who have previously violated the USDOT testing program must provide documentation that they have successfully completed the USDOT's Return-to-

Duty process with a DOT-qualified Substance Abuse Professional (SAP). Failure to provide satisfactory documentation will exclude the applicant from being hired or transferred into a safety-sensitive position with MTM Transit.

5. PRE-EMPLOYMENT TESTING

All applicants for safety-sensitive positions shall undergo a pre-employment urine drug test. MTM Transit must receive an MRO-verified negative drug test result prior to the applicant's first performance of any safety sensitive function, including behind-the-wheel training.



*If an applicant's pre-employment urine drug test result is verified as positive, **the applicant will be excluded from consideration for employment in a safety-sensitive position with MTM Transit.***

The applicant will be provided a list of USDOT-qualified Substance Abuse Professionals. An employee returning from an extended leave period of 90 consecutive days or more, and whose name was *also* removed from the random testing pool for 90 days or more, must submit to a pre-employment urine drug test. MTM Transit must be in receipt of a negative drug test result prior to the employee resuming any safety-sensitive function.

6. RANDOM TESTING

Safety-sensitive employees will be subject to random, unannounced testing. MTM Transit will perform random testing in a manner that meets or exceeds the FTA minimum annual testing requirements, as amended. The selection of employees for random testing will be made using a scientifically valid method. All safety-sensitive employees will have an equal chance of being selected each time a random draw is performed. *Random alcohol tests* will be conducted just before, during or just after the employee's performance of a safety-sensitive function. *Random drug tests* may be conducted anytime an employee is on duty.

Once an employee is notified that they have been selected for a random test, they must proceed immediately to the testing location. Failure to proceed immediately may be deemed a refusal to test.

All random testing for drugs and alcohol conducted under this part are unannounced and unpredictable, and that the dates for administering random tests are reasonably spaced throughout the calendar year. Random testing must be conducted at all times of day when safety-sensitive functions are performed.

7. REASONABLE SUSPICION TESTING

All safety-sensitive employees must submit to reasonable suspicion drug and/or alcohol testing when a supervisor or company official trained in detecting signs and symptoms of drug use and alcohol misuse has made specific, contemporaneous, articulable observations concerning an employee's appearance, speech, behavior and/or body odor. Reasonable suspicion testing for alcohol misuse will occur when observations are made just before, during, or just after the employee's performance of a safety-sensitive function. Reasonable suspicion testing for prohibited drugs may be conducted anytime an employee is on duty or on standby for duty and a trained supervisor has made the observations.

8. POST-ACCIDENT TESTING

FATAL ACCIDENTS

Safety-sensitive employees must submit to post-accident drug **and** alcohol testing following an accident involving a public transportation vehicle that results in the loss of human life. In addition to a surviving operator of the vehicle, any other surviving, safety-sensitive employee whose performance could have contributed to the accident must also be tested.

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

NON-FATAL ACCIDENTS

All safety-sensitive employees whose actions cannot be completely discounted as a contributing factor must submit to post-accident drug and alcohol testing when a non-

fatal accident involving a public transportation vehicle meets one or more of the following meets one or more of the following thresholds:

1. An individual suffers bodily injury and immediately receives medical treatment away from the scene.
2. One or more vehicles incurs disabling damage that **requires** the vehicle(s) to be towed away from the accident scene.
3. If the public transportation vehicle is a rail car, trolley car, trolley bus or vessel and has been removed from service.

MTM Transit officials will use the best information available *at the scene*, to determine if a safety-sensitive employee's performance can be completely discounted as a contributing factor to the accident.

Post-accident drug and alcohol tests will be conducted as soon as practicable following the accident. Any safety-sensitive employee involved in an accident must refrain from alcohol use for eight (8) hours following the accident or until the employee undergoes a post-accident alcohol test. Any safety-sensitive employee who leaves the scene of the accident without a justifiable reason or explanation prior to submitting to drug and alcohol testing may be deemed to have refused the test. However, employees are not prohibited from leaving the scene of an accident to obtain assistance in responding to the accident or to obtain necessary emergency medical care.

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

9. URINE SPECIMEN COLLECTIONS

Urine specimen collections will be conducted in accordance with USDOT rule, 49 CFR Part 40, as amended. Collectors will be appropriately trained and qualified to perform urine specimen collections for USDOT covered employers. Urine specimen collectors will use the split-specimen collection method and will afford the donor (employee) the greatest degree of privacy permitted per 49 CFR Part 40, as amended. When an observed collection is required, the observer will be of the same gender as the donor (employee).

10. REFUSAL TO SUBMIT TO URINE DRUG TESTING

The following actions constitute a “refusal to test” in accordance with 49 CFR Part 40, as amended:

1. Failure to appear for any test within a reasonable time, as determined by the employer, consistent with applicable DOT agency regulations, after being directed to do so by the employer (pre-employment testing not applicable).
2. Failure to remain at the testing site until the testing process is completed (after the process has been started).
3. Failure to provide a urine specimen for any drug test required by this part or DOT agency regulations.
4. In the case of a directly observed or monitored collection in a drug test, fail to permit the observation or monitoring of your provision of a specimen.
5. Failure to provide a sufficient amount of urine when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure.
6. Failure or decline to take an additional drug test the employer or collector has directed you to take.
7. Failure to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by MTM Transit.
8. Failure to cooperate with any part of the testing process (e.g., refuse to empty pockets when directed by the collector, behave in a confrontational way that disrupts the collection process, fail to wash hands after being directed to do so by the collector).
9. For an observed collection, failure to follow the observer’s instructions to raise your clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if you have any type of prosthetic or other device that could be used to interfere with the collection process.
10. Possessing or wearing a prosthetic or other device that could be used to interfere with the collection process.
11. Admitting to the collector or MRO that you adulterated or substituted the specimen.
12. When the MRO verifies your drug test result as adulterated or substituted.

Refusing to submit to a USDOT/FTA required test is a violation of the USDOT/FTA testing program. Employees are required to be immediately removed from safety-sensitive duty and provided a list of USDOT-qualified Substance Abuse Professionals.



*Per MTM Transit authority, **violation of the USDOT/FTA testing program will result in termination of employment.***

11. URINE SPECIMEN ANALYSIS

All specimens will be transported or shipped to a laboratory certified by the Department of Health and Human Services (DHHS). All specimens will be analyzed at the laboratory in accordance with 49 CFR Part 40, as amended. The procedures that will be used to test for the presence of prohibited drugs will protect the employee and the integrity of the drug testing process, safeguard the validity of the test results and ensure that the test results are attributed to the correct employee. Laboratory confirmed drug test results will be released only to a certified Medical Review Officer (MRO) for review and verification.

NEGATIVE-DILUTE SPECIMENS

Upon receipt of an MRO verified negative-dilute drug test result with creatinine levels greater than 5 mg/dL and less than 20 mg/dL, MTM will require applicants and employees to submit to a second urine collection per 49 CFR Part 40.197. The collection of the second specimen **will not** be conducted using direct observation procedures. The MRO verified result of the second urine drug test will be accepted by MTM as the final result and the test of record. MTM Transit will apply this policy provision uniformly for all pre-employment and random urine drug tests reported by the Medical Review Officer to have creatinine levels greater than 5mg/dL but less than 20mg/dL (negative-dilute results). Once notified that a second collection is required, employees must proceed immediately for testing. An employee's failure to report immediately may be deemed as a refusal to submit to testing, which is a violation of the USDOT/FTA testing program.



Per MTM Transit authority, violation of the USDOT/FTA testing program will result in termination of employment.

12. ROLE OF THE MEDICAL REVIEW OFFICER (MRO)

The role of the Medical Review Officer is to review and verify laboratory confirmed test results obtained through a DOT-covered employer's testing program. When a non-negative drug test result is received, the MRO will communicate with the donor (employee) to determine if a legitimate medical explanation exists. When a legally prescribed medication has produced a non-negative result, the MRO will verify the prescription and report the result as "negative" to MTM Transit. Medical conditions and other information obtained by the MRO during the interview with the donor will be maintained in a confidential manner. However, if the MRO believes that a medication prescribed to the donor may pose a significant safety risk, the MRO will require the donor to contact his/her prescribing physician and request that the physician contact the MRO within 5 business days.

The MRO and prescribing physician will consult to determine if the employee's medication use presents a significant safety risk. MTM Transit will be notified by the MRO when the outcome of the consultation results in a determination that the donor's medication use presents a significant safety risk. If the employee's prescribing physician fails to respond, the safety concern will be reported to MTM Transit without consultation. Based on the MRO recommendation, MTM Transit may deem the employee medically disqualified from performing safety-sensitive functions. The MRO assigned to review and verify laboratory drug test results for MTM Transit is:

Name of MRO: Fredrick Pope MD., MRO – Foley MRO Services

Address: 140 Huyshope Ave.
Hartford, CT 06106

Phone Number: 860-815-0825

Fax Number: 860-815-0749

Name of Alternate MRO: Samar Choksi, MD

Address: 2221 SW 19 Av Rd. Suite 200
Ocala, FL 34471

Phone Number: 215-637-6800

Fax Number: 215-637-8246

13. CONSEQUENCE FOR MRO VERIFIED POSITIVE DRUG TEST

When MTM Transit is notified of an MRO verified positive drug test, or a test refusal due to adulteration or substitution; the violating employee will be immediately removed from safety-sensitive duty and provided a list of DOT-qualified Substance Abuse Professionals. Applicants will be excluded from hire and provided a list of DOT-qualified Substance Abuse Professionals.



*Per MTM Transit authority, **violation of the USDOT/FTA testing program will result in termination of employment.***

14. SPLIT SPECIMEN TESTING

As an important employee protection, split specimen collection procedures will be used for all USDOT/FTA urine collections. When an employee challenges an MRO verified result, he/she may request that the split specimen (bottle B) be tested at a different DHHS certified laboratory that conducted the test of the primary specimen (bottle A). Instructions for requesting the split specimen test will be provided by the Medical Review Officer during his/her interview with the donor (employee). In accordance with USDOT rule, MTM Transit will ensure that the fee to process the split specimen test is covered, in order for a timely analysis of the split specimen. ***MTM Transit may seek reimbursement for the cost of the split specimen test.***

15. ALCOHOL PROHIBITION

Safety-sensitive employees are prohibited from consuming alcohol while performing safety-sensitive functions, within (4) four hours prior to performing a safety sensitive function, or during the hours that they are on call or standby for duty. No safety-sensitive employee shall report for duty or remain on duty while having an alcohol concentration of 0.04 or greater. Safety-sensitive employees must not consume alcohol within eight (8) hours following an accident or until the employee submits to post-accident testing, whichever occurs first.

16. ALCOHOL TESTING

All alcohol screening tests and confirmation tests will be performed in accordance with USDOT rule, 49 CFR Part 40. The procedures that will be used to test for alcohol misuse will protect the employee and the integrity of the testing process, safeguard the validity of the test results, and ensure the test results are attributed to the correct employee.

When an alcohol-screening test indicates a blood alcohol concentration (BAC) of 0.02 or greater, a confirmation test will be performed using an evidential breath-testing device listed on the USDOT/ODAPC webpage as an “Approved Evidential Breath Measurement Device”. The confirmed blood alcohol concentration (BAC) result will be transmitted by the technician to MTM Transit in a confidential manner. A safety-sensitive employee who has a confirmed blood alcohol concentration (BAC) of 0.02 or greater but less than 0.04 will be removed from safety-sensitive duties for a period of at least (8) eight hours or until test results *fall below 0.02*.

17. CONSEQUENCE FOR A USDOT/FTA CONFIRMED ALCOHOL VIOLATION

A safety-sensitive employee who has a confirmed blood alcohol concentration (BAC) of 0.04 or greater has violated the USDOT/FTA testing program and will be removed from safety-sensitive duty and provided a list of DOT-qualified Substance Abuse Professionals.



*Per MTM Transit authority, **violation of the USDOT/FTA testing program will result in termination of employment.***

18. REFUSAL TO SUBMIT TO ALCOHOL TESTING

The following actions constitute a refusal to submit to an alcohol test:

1. Fail to appear for any test within a reasonable time, as determined by the employer, consistent with applicable DOT agency regulations, after being directed to do so by the employer.
2. Fail to remain at the testing site until the testing process is complete
3. Fail to provide an adequate amount of saliva or breath for any USDOT required alcohol test
4. Fail to provide a sufficient breath specimen, and the physician has determined, through a required medical evaluation, that there was no adequate medical explanation for the failure
5. Fail to undergo a medical examination or evaluation, as directed by the [Agency]
6. Fail to sign the certification at Step 2 of the ATF
7. Fail to cooperate with any part of the testing process.

Refusing to submit to a USDOT/FTA required test is a violation of USDOT/FTA testing program. Employees must be immediately removed from safety-sensitive duty and provided a list of USDOT-qualified Substance Abuse Professionals.



*Per MTM Transit authority, **violation of the USDOT/FTA testing program will result in termination of employment.***

19. MTM TRANSIT TESTING PROGRAM CONTACTS

Drug and Alcohol Program Manager (DAPM)

Name: Denea Vander Wall

Address: 16 Hawk Ridge Drive, Lake St. Louis, MO 63367

Phone: 636 357-8243

Email: dvanderwall@mtm-inc.net

Alternate and Local DAPM

Name: *Local General Manager Name*

Address:

Phone:

Email:

Substance Abuse Professional

Name: American Substance Abuse Professionals

Phone: 1-888-792-2727 | Reference code: 121

Please sign the Acknowledgement of Receipt of this Policy (attached) and return to your supervisor or Designated Employer Representative.



Employee Acknowledgement of Receipt of MTM Transit

SUBSTANCE ABUSE POLICY

For additional information or questions contact your local program administrator or DAPM:

Denea Vander Wall
MTM Transit, LLC
Sr. Manager, HR – MTM Transit
dvanderwall@mtm-inc.net

By signing this form I am acknowledging that I am not currently in violation of this policy and that I am not currently using any prohibited substances, and that if I violate any parts of 49 CFR part 40 and 655, or this policy I may be terminated. I have received a legible copy of the MTM Transit Substance Abuse Policy, and 60 minutes of training on prohibited drugs and alcohol. I understand that my employment with MTM Transit is conditioned upon full adherence to this policy.

Employee Name: _____

Employee Signature: _____ **Date:** _____

Supervisor Name: _____

Supervisor Signature: _____ **Date:** _____

Employee Copy



Employee Acknowledgement of Receipt of MTM Transit

SUBSTANCE ABUSE POLICY (UPDATED 04/19/21)

For additional information or questions contact your local program administrator or DAPM:

Local General Manager
Or
Denea Vander Wall
MTM Transit, LLC
Sr. Manager, HR – MTM Transit
dvanderwall@mtm-inc.net

By signing this form I am acknowledging that I am not currently in violation of this policy and that I am not currently using any prohibited substances, and that if I violate any parts of 49 CFR part 40 and 655, or this policy I may be terminated. I have received a legible copy of the MTM Transit Substance Abuse Policy, and 60 minutes of training on prohibited drugs and alcohol. I understand that my employment with MTM Transit is conditioned upon full adherence to this policy.

Employee Name: _____

Employee Signature: _____ **Date:** _____

Supervisor Name: _____

Supervisor Signature: _____ **Date:** _____

Employee Copy

20. REFERENCES

The referenced USDOT and FTA regulations, as well informational material related to this testing program are available for review and/or download from the Florida Department of Transportation's Substance Abuse Management Website: <http://sam.cutr.usf.edu>.

Further information may be obtained from the USDOT's Office of Drug and Alcohol Policy and Compliance website: <https://www.transportation.gov/odapc> and the Federal Transit Administration's (FTA) website: <https://transit-safety.fta.dot.gov/DrugAndAlcohol/Default.aspx>



EMERGENCY ACTION PLAN AUGUST, 2023



Transit

MTM TRANSIT
220 Moffat Boulevard
Manteca, CA 95336
www.mtmtransit.com

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Section 1. Introduction

This Emergency Action Plan is designed to assist employees and management in making necessary, timely and prudent decisions during times of crisis, and to comply with the Occupational Safety and Health Administration's Standard for Emergency Action Plans, 29 CFR 1910.38. This plan contains guidance in determining the appropriate actions to take in the event of an emergency to prevent injury and property loss.

Approvals;

Name	Signature / Printed Name	Date
City of Manteca Transit Manager:	Juan Portillo	September 2023
MTM General Manager:	Mark Fraley	September 2023
MTM Operations Manager:	Francis Kemp	September 2023
MTM Safety Manager:	Francis Kemp	September 2023
MTM Maintenance Manager:	Adam Perriera	September 2023

Section 2. Roles and Responsibilities

2.1. General Manager

The Facility General Manager is responsible for maintaining and updating the plan. He or she must approve all revisions or changes to procedures specified in the written plan. This individual is responsible for ensuring that emergency equipment remains accessible and is in good working order. The General Manager is also responsible for scheduling drills and employee training sessions. Training must be documented. General Managers are responsible for the following:

- Inspecting and maintaining emergency equipment located in their respective areas.
- Ensure that all employees receive the necessary training and information specified under this plan.
- Properly maintain any signs, bulletin boards, posters, or other information posted in their area.
- Ensure the orderly evacuation or relocation of their employees during emergencies and drills.
- Document all training and retain such documentation in the Division's training file.

2.2. Safety Manager

At the direction of the General Manager, the Safety Manager is responsible for developing and implementing the procedures in this plan. Those responsibilities include but are not limited to:

- Maintaining a written copy of the EAP and all associated training records.
- Distributing procedures for reporting a fire, bomb threat, or other emergency.
- Promote compliance with all local fire codes and regulations.
- Ensure personnel are trained in proper evacuation methods, use of fire extinguishers, and first aid (if necessary);
- Conduct and document drills.
- Ensure alarms are sounded in a timely manner when an emergency situation is encountered.
- Ensure all personnel are accounted for following an evacuation.
- Following an evacuation, determine the best practice method to locate missing personnel.
- Reporting to and coordinating with emergency personnel, upon arrival.
- Reviewing EAP, at least annually, and advising the Director of Safety of any modifications that may be necessary based on worksite changes or changes in federal, state, or local regulations and requirements.

2.3. Employees

Division employees are responsible for attending scheduled training sessions, familiarizing themselves with the location of exits, understanding the facility's emergency notification systems and following the instructions of this plan and their immediate supervisors.

Section 3. Plan Implementation

In the event of an emergency, and for the safety of our employees, it is important that notification be made of said emergency in a timely manner so emergency personnel may be notified, and evacuation procedures can be implemented.

3.1 Notification

A. Facility Notification System

This facility is equipped with a system of fire alarms. These alarms include smoke detectors and employee-activated alarms. Hearing any of these alarms indicates that an emergency has occurred somewhere in the facility. Instructions for appropriate action will be issued by management/dispatch. If instructions are not received immediately, employees should report to the parking lot or other designated safe location and remain there until dismissed by their supervisors. Management is responsible for assuring all employees are accounted for and out of the building.

B. Facility Map

A map of this facility (Appendix A), clearly identifying emergency exits, alarms, and equipment is posted on bulletin boards. Maps must be posted in all employee common areas.

C. Marking of Exits

All emergency exits at MTM facilities should be clearly marked using illuminating signs (where applicable) marked "EXIT", in letters at least 6 inches high.

Doors that do not lead to exits but might be mistaken as such should be marked "NOT AN EXIT."

D. Emergency Exits Requirements

- This facility is equipped with enough exits to allow the rapid and orderly evacuation of all personnel.
- Emergency Exits and the approach to Exits must always be kept clear.
- Emergency Exits doors must always remain unlocked during hours of operations or while employees are present. They are to be unobstructed at all times.
- All Emergency Exits must discharge to a street or other open space (parking lot, etc.) that gives ready access to a public way.
- Emergency Exits doors serving 50 or more people must swing in the direction of exit travel.

E. Methods and Routes of Evacuation:

- Evacuation involves removing employees or customers from the facility/building. It is used when conditions inside the facility buildings become threatening to the life, health and/or safety of occupants, such as in the instance of fires and explosions. All employees, at the direction of their supervisor, will assemble in the designated evacuation area as defined in Appendix B
- Relocation involves moving employees from one facility to another. It is used in the event of external threats, such as severe weather, civil disorder, or security contingency. If MTM relocates due to an extreme emergency, all employees will meet at the designated off-site evacuation area (see appendix C).

F. Phone Numbers for Fire, Police and Medical Services:

The following numbers are provided for use in emergencies and is posted for employees to see (Appendix D):

POLICE:	911
FIRE:	911
MEDICAL AID:	911
BUILDING SECURITY:	209-456-8896 / 636-723-9362
BUILDING MANAGER:	209-456-8775
GENERAL MANAGER:	209-456-8894 / 650-695-2235

3.2 Emergency Procedures

The following are instructions for personnel regarding the proper actions to be taken for personal safety, and the procedures that are to be implemented to assist management efforts during an emergency.

A. Fire and Explosion:

In case of a fire or explosion, the following procedure should be used:

- Immediately trigger the fire alarm and contact management. Inform them of the location, size and status of the blaze. Managers will notify the fire department of the problem and dispatch additional personnel to assist in controlling the fire (as safety allows).
- Attempt to control the fire with the appropriate extinguisher (extinguishers must be inspected, tested, and maintained [29 CFR 1910.157(b)(2)]) if this can be done safely. (Implies mandatory fire extinguisher training annually)
- Wait for further instructions from management.

Should evacuation or relocation be necessary:

- Shut down operations in the work area if these can be done safely.
- Report to the specified assembly point, or as directed by the Facility Manager.
- Remain at that location until instructed to go elsewhere.

Procedures for the Safety Manager, Supervisors, and/or other lead personnel:

- Respond to all reported fires and direct the actions of employees.
- Ensure that necessary actions such as evacuation, accountability of personnel, fire suppression of incipient fires etc. are initiated.
- Advise and/or assist emergency personnel with pertinent information such as utility shut down, floor plan layout, contents of facility, hazardous materials storage etc.
- Direct employees to assemble at the designated evacuation area or other area of safe refuge.
- Establish telephone communication capabilities to allow employees to notify relatives or friends of their whereabouts and status.
- Establish a telephone response line for incoming questions from employee's relatives concerning site activities.

B Chemical Spills/Fuel Leaks:

Employee Procedures for Spills / Leaks:

- On-site personnel will handle surface spills with absorbent pads. Immediately contact the Maintenance Department and your Area Safety Director if a spill cannot be handled by onsite personnel or if the spill impacts soil or waterway conveyance.

Procedures for the Safety Manager, Supervisors, and/or other lead personnel:

- Upon receipt of the call, immediately respond to the location.
- Ensure Emergency Services have been notified.
- Ensure that, if required, necessary actions such as evacuation, locating and accounting for personnel, and restricting access to hazards are initiated.
- Assist emergency personnel as to the present conditions in the building (i.e., location of chemical release, missing personnel, chemicals involved etc.).
- Provide emergency personnel with a copy of Safety Data Sheets for chemical (s) involved (if known).
- Advise and/or assist emergency personnel with pertinent information such as utility shut down, floor plan layout, contents of facility, hazardous materials storage etc.
- Direct employees to assemble at the designated evacuation area or other area of safe refuge.
- Establish telephone communication capabilities to allow employees to notify relatives or friends of their whereabouts and status.
- Establish a telephone response line for incoming questions from employee's relatives concerning site activities.
- Provide proper cleanup and removal of chemical materials.
- Assess damage impact and determine areas of building that cannot be reoccupied.
- Once the fire department returns control of the building, the Safety Manager shall assess whether temporary repair work to minimize further damage can be performed by employees.

C. Bomb Threats

Employee Procedures for Bomb Threats:

- If an employee receives a telephone call from an individual reporting a bomb threat, he/she should try to transfer them to the Safety Manager or supervisor. If this is not possible the employee should refer to Appendix E and ask the following questions:
 - When is the bomb going to explode?
 - Where is the bomb?
 - What does it look like?
 - What kind of bomb is it?
 - What will cause it to explode?
 - Did you place the bomb?
 - Where are you calling from?
 - What is your name?
- Immediately following the completion of the call, notify the Safety Manager and the direct supervisor by phone. **DO NOT USE A RADIO TO REPORT THE PROBLEM.** Radio transmission can detonate an explosive device.
- If an explosive device is discovered; do not touch it or move it in any way. Immediately notify the Safety Manager and the direct supervisor.
- Evacuate the facility using the closest exit route. Once employees have evacuated the facility they may not go back in until instructed to do so by their supervisor.
- Employees report to their supervisor or other lead personnel in the designated evacuation area for their workstation.

Procedures for the Safety Manager, supervisors, and/or other lead personnel:

- Ensure all personnel have been evacuated from the involved area.
- Call 911.
- Obtain as much information as possible concerning the bomb threat. Document this information.
- Assist emergency personnel as requested.

D. Facility Access Control:

This facility has designated procedures that control access to the facility. Facility access needs to be allowed or restricted as needed (i.e.: increased terror alert levels may dictate restricted access to the facility). Special consideration / regular inspection is given to the following:

- Perimeter security fences
- Access gates/doors
- Employee-only areas
- Bus/vehicle holding lots.
- Exterior/interior security cameras and lighting systems
- Vendor access procedures

E. Severe Weather and Natural Disasters

Severe weather can take many forms, including tornado, hurricane, earthquake, flood, or winter storm. All these situations can impact the facility. Most severe weather situations provide some degree of warning or buildup, which allows for implementation of necessary preparations. Given the various types of severe weather situations, a winter storm is the most likely occurrence.

Hurricanes

The General Manager will develop and implement site-specific facility shutdown and hurricane preparation procedures for each facility subject to hurricanes. Guidelines are available from local government emergency preparedness units and from the MTM Safety Department.

Facilities located in hurricane-prone areas need to strongly consider purchasing supplies that can be used to secure and protect their building prior to the onset of hurricane season (typically August through December). The supplies would include items such as plywood (window/doors protection), plastic sheeting, duct tape, sandbags, etc. These supplies need to be stored onsite for ready use when needed.

Tornadoes and Other Severe Weather

A tornado or severe weather warning will be issued. Specific instructions will also be given at this time.

DO NOT GO OUTSIDE to look at tornadoes!

In the event of a tornado, all employees should move to center rooms and corridors, away from windows, skylights, and other areas where there is potential for flying glass. Employees should remain in this area until all clear is given.

Earthquakes:

Earthquakes are most prevalent on the West Coast, although they may occur almost anywhere. Buildings in areas prone to earthquakes should have appropriate design features, and additional steps should be implemented to prevent shifting and falling of flammable materials containers, compressed gas cylinders, equipment lifts, etc. The General Manager of such Divisions should prepare site-specific procedures for dealing with earthquakes.

F. Civil Strife:

Civil strife may result from a variety of sources, including demonstrations and strikes. The General Manager and other management personnel will work together to issue case-specific instructions for employees facing such situations. If incidents occur spontaneously on company property, they must be reported to corporate management immediately via the MV Event Notification protocols. All employees are expected to cooperate fully with management and law enforcement agencies during such events.

G. Sabotage:

Any incident of sabotage which results in fire, injuries or other emergency situations will be dealt with as a standard emergency as previously described, except that the following additional procedures will be followed:

- The area or item suspected of being sabotaged will not be disturbed until facility security, law enforcement and/or the Facility Managers have had the opportunity to inspect it.
- Incidents of suspected sabotage must be reported immediately to the General Manager. The GM will call the police as appropriate.
- Employees involved in the incident will remain in the area until dismissed by Facility Management unless it is unsafe to do so.

H. Procedures for Facility Shutdown:

Each facility must have written facility shutdown procedures. This procedure should include the following elements:

- Operation/department shutdown priorities.
- Turning off burners and other gas-operated equipment (if applicable).
- De-energizing electrical equipment or circuits.
- Storage of tools and equipment.
- Inventory procedures for shutdowns.
- Planned and unplanned shutdowns.
- Personnel responsibilities during shutdowns.
- Restoring operations.

I. Heightened Security Levels

In the event of an emergency, it is imperative that all employees be aware of their surroundings. This includes paying attention to suspicious people and/or packages. If an employee notices anything that does not conform to the norm, they must report it to a supervisor immediately.

Unattended Baggage/Packages

All employees must be encouraged to maintain a high degree of awareness of unattended bags or packages, particularly if they appear out of place or hidden. If it looks out of place, question it and notify management or local law enforcement authorities / security personnel (as appropriate). Employees will receive training on unattended baggage and package procedures.

Suspicious Individuals or Activity

All employees must be encouraged to maintain a high degree of awareness of their surroundings and working environment, and to take note of suspicious individuals or activities. Employees will receive training on suspicious individuals or activities procedures.

J. Securing Property and Equipment

If an evacuation of the premises is necessary, some items may need to be secured to prevent further detriment to the facility and personnel on hand such as securing confidential or irreplaceable records or shutting down equipment to prevent release of hazardous materials. Only the Safety Manager and those they designate will remain in the building for the prescribed amount of time to secure the property and equipment to which they have been assigned.

All individuals remaining behind to shut down critical systems or utilities are knowledgeable in recognizing when to abandon the operation or task. Once the property or equipment is secured, or the situation becomes too dangerous to remain, these individuals are to exit the building by the nearest escape route and meet the remainder of the employees at the designated assembly point.

K. Hostile Environment & Violence in the Workplace

There are 4 types of workplace violence that may occur at a job site.

- TYPE 1: Violent acts by criminals who have no other connection with the workplace but enter to commit robbery or another crime.
- TYPE 2: Violence directed at employees by customers, clients, patients, students, inmates, or any others for whom an organization provides services.
- TYPE 3: Violence against coworkers, supervisors, or managers by a present or former employee.
- TYPE 4: Violence committed in the workplace by someone who doesn't work there but has a personal relationship with an employee—an abusive spouse or domestic partner.

In the event of a hostile threat or situation, it is important for personnel to protect themselves by removing themselves from the danger zone by running out of the building. If leaving the building is not an option, personnel are to lock themselves in a secure room, silence their cell phone ringers and buzzers and turn off the lights. If possible, barricade the door with heavy equipment and seek refuge behind a desk, wall, or other barrier.

When all options have been exhausted, the last resort is to fight and keep fighting until the assailant is down. Use any weapon you have available at your disposal to defend yourself.

L. Chemical, Biological or Radiological Release / Shelter in Place

In the event of the release of a contaminant into the atmosphere, or a pandemic reaching critical levels, and depending on the severity of the toxicity, the following will need to be considered.

- Shelter in place
 - Shelter in place will require all employees to report to a selected or designated room or rooms with few windows and/or vents. The rooms should have adequate space for everyone to be able to sit. Avoid overcrowding where possible. Seal the windows (cover windows to prevent windows blowing in and injuring someone in case of an explosion), doors and vents to prevent any contaminated air from filtering in. Remember to turn off all heaters, air conditioners and vents to further avoid contamination.

- If there are customers, clients, or visitors in the building, they will be required to remain on property for their safety. Visitors should be allowed to call their loved ones to advise them of their situation and location to reassure them they are safe.
- Gather essential disaster supplies such as nonperishable food, bottled water, battery powered radios, first-aid supplies, flashlights, batteries, duct tape, plastic sheeting and plastic garbage bags.
- It is advisable to have the room hardwired with a telephone or ensure someone has a reliable source of communication to report a life-threatening emergency (remember, cell phone services may be overwhelmed during a time of crisis).
- Take the names of everyone in the room and report that information to your designated emergency contact representative.
- If you are required to close the business, lock all doors and windows, forward all calls to your designated recipient. If the company has a voice recorded message, change the message to reflect the current situation. Listen to the radio or television for any information or further instructions.
- Evacuate
 - If there is a need to evacuate due to extreme circumstances, refer to section E. Methods and Routes of Evacuation.

Section 4. Advanced Medical Care

Under no circumstances is an employee to provide advanced medical care or treatment. These situations are to be left to emergency response professionals who have the training, equipment, and expertise. Untrained individuals may endanger themselves and/or those they are trying to assist.

Section 5. Accounting for Employees After an Evacuation

Once an evacuation has occurred, supervisors shall account for all assigned employees, personally or through a designated employee, by having all designated employees report to a prearranged assembly point and conducting a head count. Each assigned employee must be accounted for by name. All supervisors are required to report their head count, by name, to the Safety Manager as soon as possible.

Section 6. Terminating the Emergency

6.1. Re-Entry

Once the building has been evacuated, no one shall re-enter the building for any reason, except for designated and professionally trained rescue personnel such as fire department or emergency medical professionals. Untrained individuals may endanger themselves and/or those they are trying to rescue.

All employees shall remain at the designated assembly point until the fire department or other emergency response agency notifies the Safety Manager that either:

- The building is safe for re-entry, in which case personnel shall return to their workstations; or
- The building and possibly the assembly area is not safe, in which case personnel shall be instructed by the Safety Manager or his/her designated employee on how/when to vacate the premises.

6.2. Incident Debriefing

The purpose of the debriefing is to inform personnel about any hazards that may remain on the facility property following the incident and to identify unsafe conditions that may still exist. Some employees may be profoundly impacted by the events surrounding an incident, especially those involving injuries or loss of life. It may be necessary to provide critical-incident stress debriefing sessions following such incidents. The Safety Manager shall make arrangements for counseling services as needed following an emergency situation.

Section 7. Training Program

MTM personnel will receive training in the EAP appropriate to the level of their expected involvement. The specific lesson plan and training topics are to be maintained by the Safety Manager. The following is the general training program for each of the identified groups.

7.1. Employees

All employees shall receive instruction on this emergency action plan as part of new employee orientation upon hire. Additional training shall be provided:

- When there are any changes to the plan and/or facility.
- When an employee's responsibilities change; or
- Annually as refresher training.

Items to be reviewed during the training include:

- Proper housekeeping.
- Fire prevention practices.
- Fire extinguisher locations, usage, and limitations.
- Threats, hazards, and protective action.
- Means of reporting fires and other emergencies.
- Individual responsibilities.
- Alarm systems.
- Escape routes and procedures.
- Emergency shut-down procedures.
- Procedures for accounting for employees.
- Closing doors.
- Severe weather/natural disaster procedures; and
- Emergency action plan availability.

7.2. Other Lead Personnel

Employees designated to assist the Safety Manager and/or supervisors during an emergency shall receive additional training, as appropriate to their respective assignments.

7.3. Supervisors

All supervisors will receive additional training, beyond that received by employees. This training will deal with actions that are necessary to provide for the safety of personnel and the protection of facility assets.

7.4. Drills and Exercises

Fire evacuation drills shall be conducted at least annually and shall be conducted in coordination with local police and fire departments. Additional drills shall be conducted if the physical properties of the business change, processes change, or as otherwise deemed necessary by the Safety Manager.

7.5. Record Keeping

The Safety Manager shall document all training as it pertains to this plan and shall maintain those records.

7.6. Plan Evaluation

The emergency action plan shall be reviewed annually, or as needed if changes to the worksite are made. Following each drill, the Safety Manager shall evaluate it for its effectiveness and weaknesses and shall implement changes to improve it, as needed.

The Safety Manager shall advise the Safety Director of any modifications that may be necessary.

Section 8. Appendices

- A. Facility Evacuation Map**
- B. Evacuation Meeting Area**
- C. Off Site Evacuation Meeting Area**
- D. Emergency Numbers**
- E. Bomb Threat Questionnaire**
- F. Designated Key Personnel**

RECEIPT AND ACKNOWLEDGEMENT OF POLICY AND TRAINING

EMERGENCY ACTION PLAN

I _____ confirm that I have received a copy of the document titled: "Emergency Action Plan" and understand its provisions.

I further confirm that I have received training in the following areas.

- Duties and responsibilities
- How to identify and report potential emergency situations
- Alarm systems and other methods of emergency notifications
- Escape routes from the building and location of meeting place
- Names/Job titles of persons who can be contacted for further information or explanation of duties under the program.

Employee Printed Name: _____

Employee Signature: _____

Date: _____

Instructor Printed Name: _____

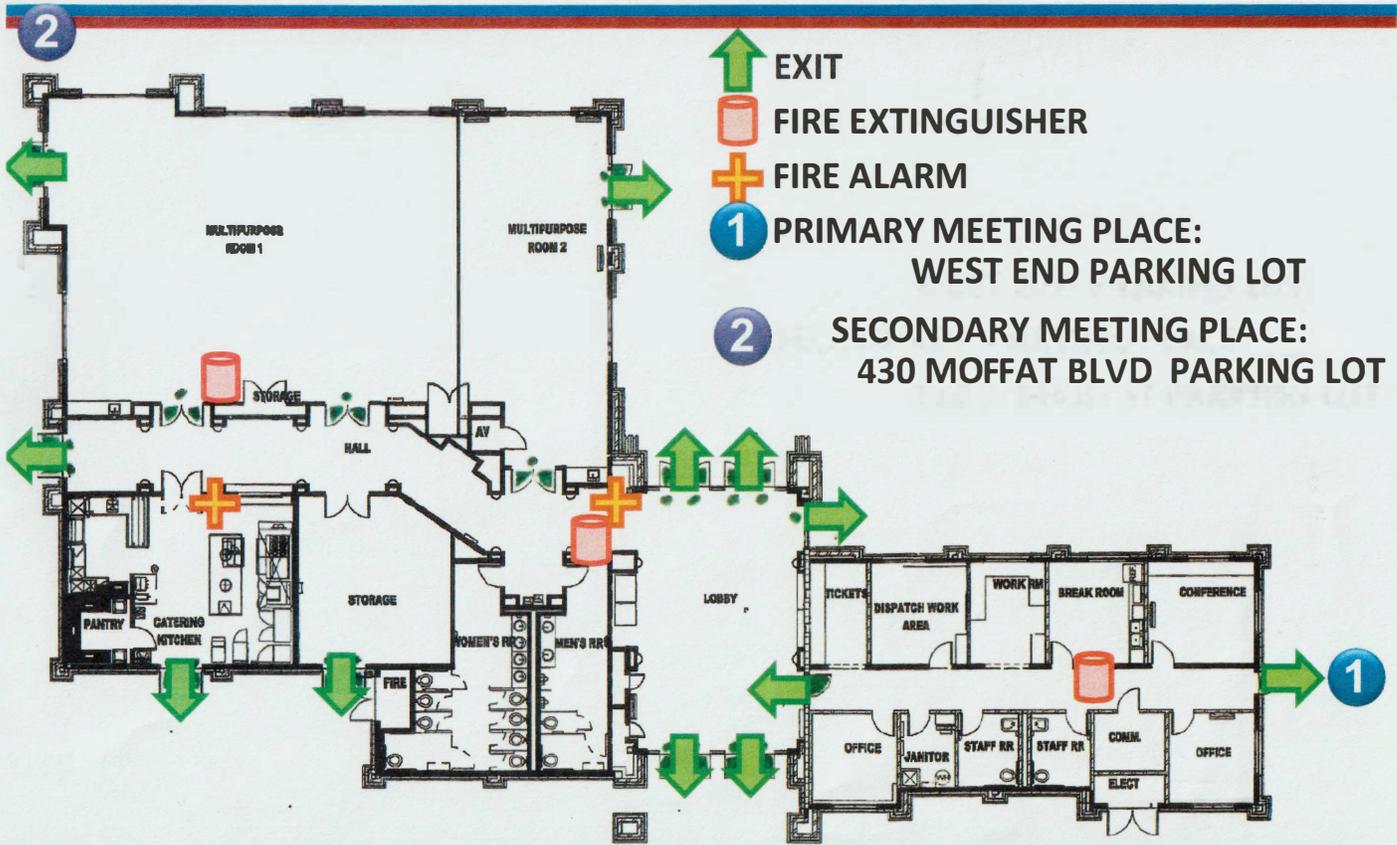
Instructor Signature: _____

Date: _____

Emergency Action Plan

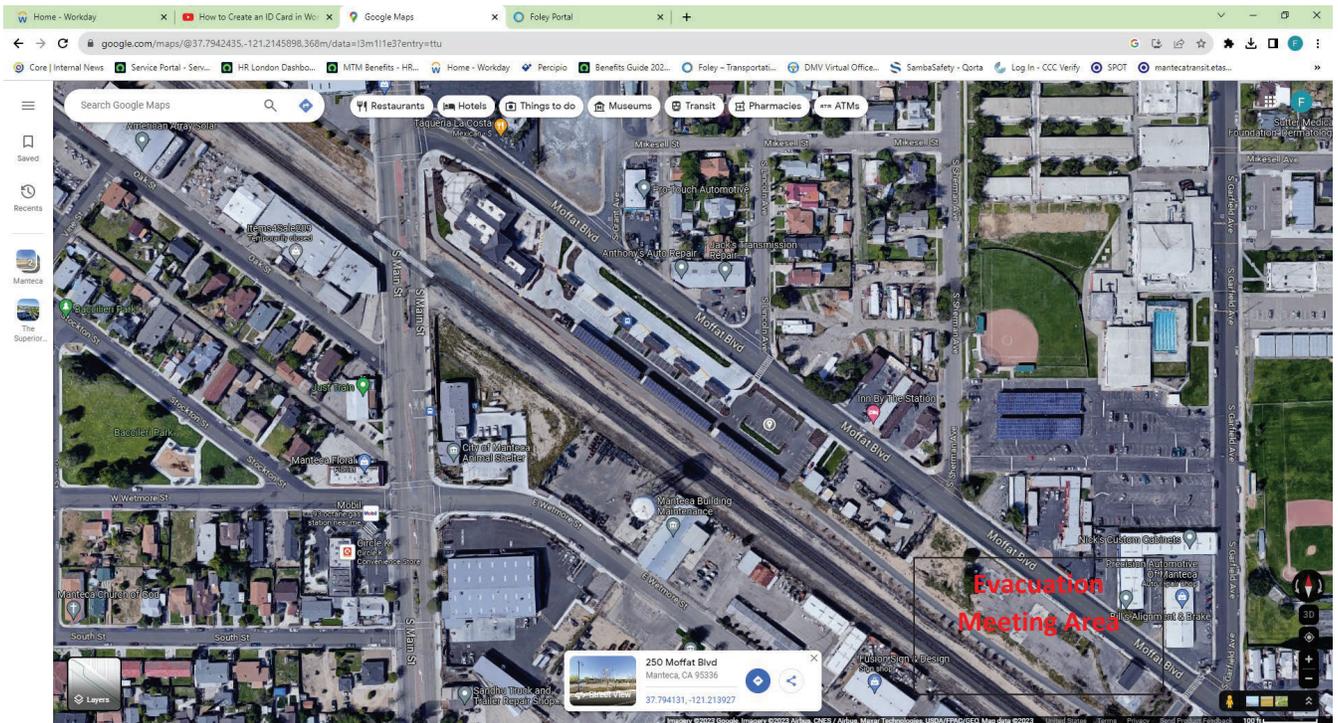


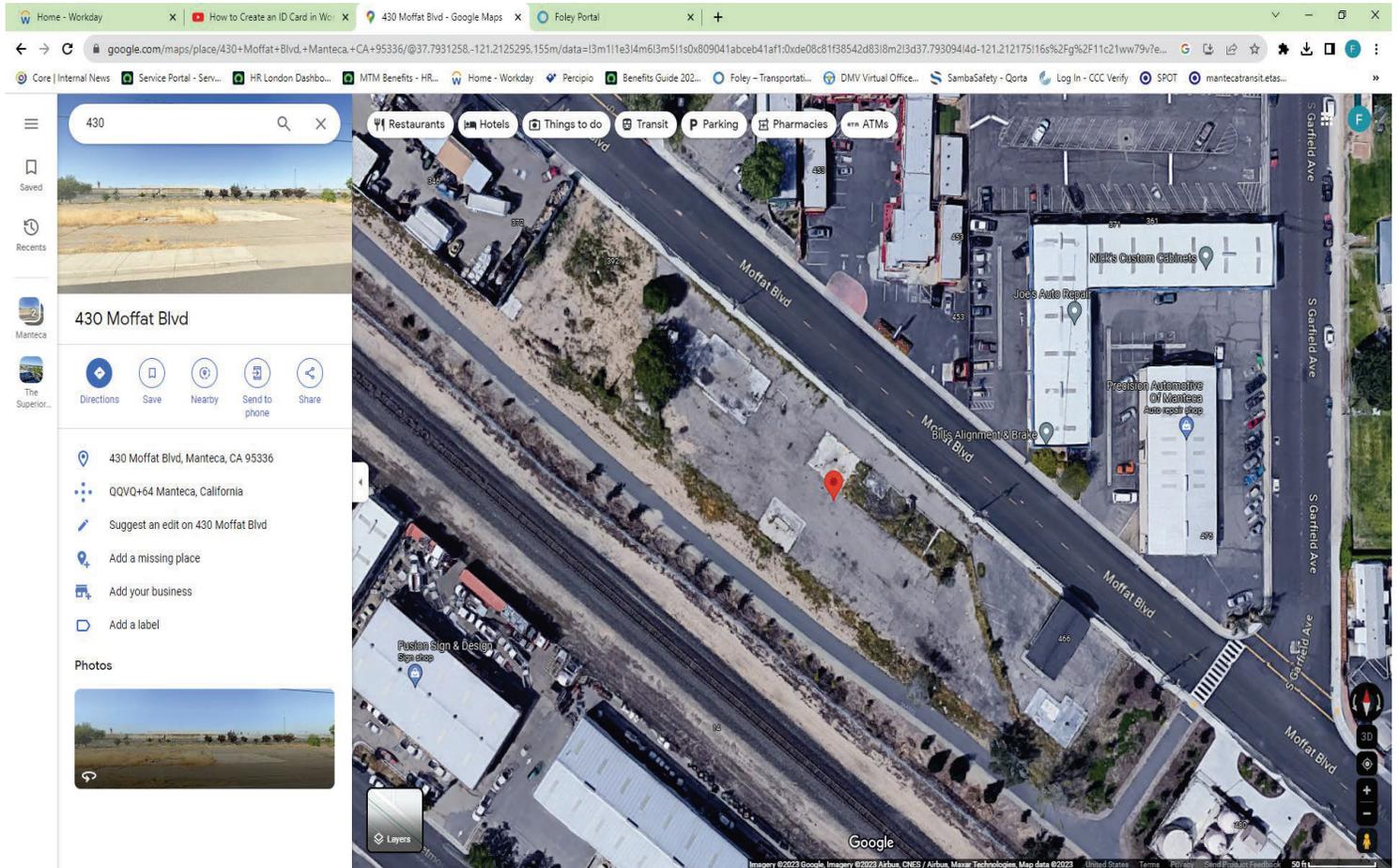
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Transit

Appendix B





APPENDIX C



Transit

Appendix D

Emergency Numbers

FIRE 911

POLICE 911

MEDICAL 911

General Manager – Mark Frailey – 209-456-8894

Safety and Training Department

Safety & Training Manager – Francis Kemp – 209-456-8896

Fixed Route and Dial-a-Ride Operations

Dispatchers – 209-456-8888

Operations Manager – Francis Kemp – 209-456-8896

Maintenance Department

Manager – Adam Perriera – 925-726-6340

Appendix E

Questions to Ask the Caller

When is the bomb going to explode?

Where is the bomb?

What does it look like?

What kind of bomb is it?

What will cause it to explode?

Did you place the bomb?

Why did you place the bomb?

Where are you calling from?

What is your address?

What is your name?

Observations

If the voice is familiar, whom did it sound like?

Were there any background noises?

Telephone number call received at:

Person receiving call:

Appendix E

Bomb Threat Checklist

Exact time and date of call:

Exact words of caller:

Voice

- Loud
- High Pitched
- Raspy
- Intoxicated
- Soft
- Deep
- Pleasant
- Other
- Raspy
- High Pitched
- Loud

Accent

- Local
- Foreign
- Race
- Not Local
- Region
- Local
- Foreign
- Race
- Not Local
- Region

Manner

- Calm
- Rational
- Coherent
- Deliberate
- Righteous
- Angry
- Irrational
- Incoherent
- Emotional
- Laughing

Background Noise

- Factory Machines
- Bedlam
- Music
- Office Machines
- Mixed
- Street Traffic
- Trains
- Animals
- Quiet
- Voices
- Airplanes
- Party Atmosphere

Language

- Excellent
- Fair
- Foul
- Good
- Poor
- Other
- Pleasant
- Other
- Raspy

Speech

- Fast
- Distinct
- Stutter
- Slurred
- Slow
- Distorted
- Nasal
- Lisp
- Other

Familiarity with Threatened Facility

- Much
- Some
- None

Appendix F

Designated Key Personnel

Emergency Response Coordinator Mark Frailey

Outside Contact Person Francis Kemp

Internal Inspector..... Designee



ACTIVE SHOOTER HOW TO RESPOND



October 2008

Emergency Numbers

EMERGENCY SERVICES: 9 -1 -1

LOCAL EMERGENCY INFORMATION LINE: 209-953-6200

LOCAL POLICE DEPARTMENT: 209-239-8401

LOCAL FIRE DEPARTMENT: 209-239-8435

LOCAL HOSPITAL: 209-823-3111

LOCAL FBI FIELD OFFICE: 209-622-8871

FACILITY SECURITY: 209-456-8896

FACILITY ADDRESS: 220 Moffat Blvd

Manteca, CA 95336

FLOOR: _____ SUITE/ROOM: _____

OFFICE #: 209-456-8888 EXT. _____

PROFILE OF AN ACTIVE SHOOTER

An Active Shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area; in most cases, active shooters use firearms(s) and there is no pattern or method to their selection of victims.

Active shooter situations are unpredictable and evolve quickly. Typically, the immediate deployment of law enforcement is required to stop the shooting and mitigate harm to victims.

Because active shooter situations are often over within 10 to 15 minutes, before law enforcement arrives on the scene, individuals must be prepared both mentally and physically to deal with an active shooter situation.

Good practices for coping with an active shooter situation

- Be aware of your environment and any possible dangers
- Take note of the two nearest exits in any facility you visit
- If you are in an office, stay there and secure the door
- If you are in a hallway, get into a room and secure the door
- As a last resort, attempt to take the active shooter down. When the shooter is at close range and you cannot flee, your chance of survival is much greater if you try to incapacitate him/her.

**CALL 911
WHEN IT IS SAFE TO DO SO!**

HOW TO RESPOND WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY

Quickly determine the most reasonable way to protect your own life. Remember that customers and clients are likely to follow the lead of employees and managers during an active shooter situation.

1. Evacuate

If there is an accessible escape path, attempt to evacuate the premises. Be sure to:

- Have an escape route and plan in mind
- Evacuate regardless of whether others agree to follow
- Leave your belongings behind
- Help others escape, if possible
- Prevent individuals from entering an area where the active shooter may be
- Keep your hands visible
- Follow the instructions of any police officers
- Do not attempt to move wounded people
- Call 911 when you are safe

2. Hide out

If evacuation is not possible, find a place to hide where the active shooter is less likely to find you.

Your hiding place should:

- Be out of the active shooter's view
- Provide protection if shots are fired in your direction (i.e., an office with a closed and locked door)
- Not trap you or restrict your options for movement

To prevent an active shooter from entering your hiding place:

- Lock the door
- Blockade the door with heavy furniture

If the active shooter is nearby:

- Lock the door
- Silence your cell phone and/or pager
- Turn off any source of noise (i.e., radios, televisions)
- Hide behind large items (i.e., cabinets, desks)
- Remain quiet

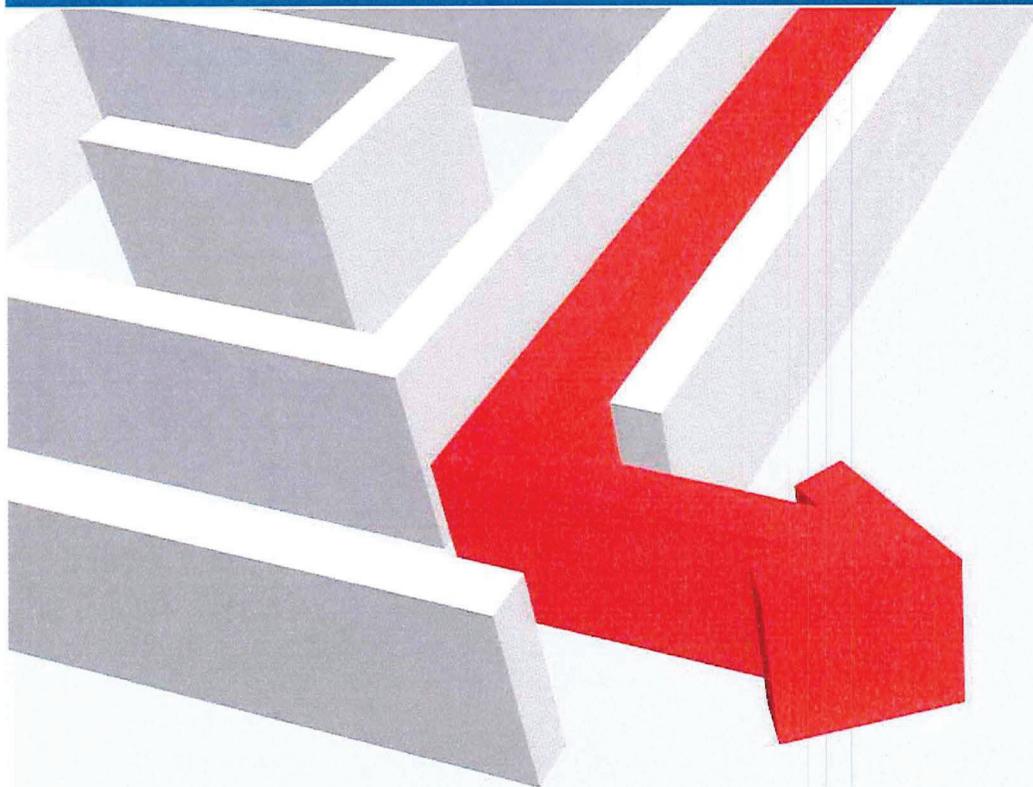
If evacuation and hiding out are not possible:

- Remain calm
- Dial 911, if possible, to alert police to the active shooter's location
- If you cannot speak, leave the line open and allow the dispatcher to listen

3. Take action against the active shooter

As a last resort, and only when your life is in imminent danger, attempt to disrupt and/or incapacitate the active shooter by:

- Acting as aggressively as possible against him/her
- Throwing items and improvising weapons
- Yelling
- Committing to your actions



HOW TO RESPOND WHEN LAW ENFORCEMENT ARRIVES

Law enforcement's purpose is to stop the active shooter as soon as possible. Officers will proceed directly to the area in which the last shots were heard.

- Officers usually arrive in teams of four (4)
- Officers may wear regular patrol uniforms or external bulletproof vests, Kevlar helmets, and other tactical equipment
- Officers may be armed with rifles, shotguns, handguns
- Officers may use pepper spray or tear gas to control the situation
- Officers may shout commands, and may push individuals to the ground for their safety

How to react when law enforcement arrives:

- Remain calm, and follow officers' instructions
- Put down any items in your hands (i.e., bags, jackets)
- Immediately raise hands and spread fingers
- Keep hands visible at all times
- Avoid making quick movements toward officers such as holding on to them for safety
- Avoid pointing, screaming and/or yelling
- Do not stop to ask officers for help or direction when evacuating, just proceed in the direction from which officers are entering the premises

Information to provide to law enforcement or 911 operator:

- Location of the active shooter
- Number of shooters, if more than one
- Physical description of shooter/s
- Number and type of weapons held by the shooter/s
- Number of potential victims at the location

The first officers to arrive to the scene will not stop to help injured persons. Expect rescue teams comprised of additional officers and emergency medical personnel to follow the initial officers. These rescue teams will treat and remove any injured persons. They may also call upon able-bodied individuals to assist in removing the wounded from the premises.

Once you have reached a safe location or an assembly point, you will likely be held in that area by law enforcement until the situation is under control, and all witnesses have been identified and questioned. Do not leave until law enforcement authorities have instructed you to do so.

TRAINING YOUR STAFF FOR AN ACTIVE SHOOTER SITUATION

To best prepare your staff for an active shooter situation, create an Emergency Action Plan (EAP), and conduct training exercises. Together, the EAP and training exercises will prepare your staff to effectively respond and help minimize loss of life.

Components of an Emergency Action Plan (EAP)

Create the EAP with input from several stakeholders including your human resources department, your training department (if one exists), facility owners / operators, your property manager, and local law enforcement and/or emergency responders. An effective EAP includes:

- A preferred method for reporting fires and other emergencies
- An evacuation policy and procedure
- Emergency escape procedures and route assignments (i.e., floor plans, safe areas)
- Contact information for, and responsibilities of individuals to be contacted under the EAP
- Information concerning local area hospitals (i.e., name, telephone number, and distance from your location)
- An emergency notification system to alert various parties of an emergency including:
 - Individuals at remote locations, within premises
 - Local law enforcement
 - Local area hospitals

Components of Training Exercises

The most effective way to train your staff to respond to an active shooter situation is to conduct mock active shooter training exercises. Local law enforcement is an excellent resource in designing training exercises.

- Recognizing the sound of gunshots
- Reacting quickly when gunshots are heard and/or when a shooting is witnessed:
 - Evacuating the area
 - Hiding out
 - Acting against the shooter as a last resort
- Calling 911
- Reacting when law enforcement arrives
- Adopting the survival mind set during times of crisis

Additional Ways to Prepare For and Prevent an Active Shooter Situation

- Preparedness
 - Ensure that your facility has at least two evacuation routes
 - Post evacuation routes in conspicuous locations throughout your facility
 - Include local law enforcement and first responders during training exercises
 - Encourage law enforcement, emergency responders, SWAT teams, K-9 teams, and bomb squads to train for an active shooter scenario at your location
- Prevention
 - Foster a respectful workplace
 - Be aware of indications of workplace violence and take remedial actions accordingly

For more information on creating an EAP contact the U.S. Department of Labor, Occupational Health and Safety Administration, www.osha.gov.



PREPARING FOR AN ACTIVE SHOOTER SITUATION · MANAGING AN ACTIVE SHOOTER SITUATION

Your human resources department and facility managers should engage in planning for emergency situations, including an active shooter scenario. Planning for emergency situations will help to mitigate the likelihood of an incident by establishing the mechanisms described below.

Human Resources' Responsibilities

- Conduct effective employee screening and background checks
- Create a system for reporting signs of potentially violent behavior
- Make counseling services available to employees
- Develop an EAP which includes policies and procedures for dealing with an active shooter situation, as well as after action planning

Facility Manager Responsibilities

- Institute access controls (i.e., keys, security system pass codes)
- Distribute critical items to appropriate managers / employees, including:
 - Floor plans
 - Keys
 - Facility personnel lists and telephone numbers
- Coordinate with the facility's security department to ensure the physical security of the location
- Assemble crisis kits containing:
 - radios
 - floor plans
 - staff roster, and staff emergency contact numbers
 - first aid kits
 - flashlights
- Place removable floor plans near entrances and exits for emergency responders
- Activate the emergency notification system when an emergency situation occurs

Reactions of Managers During an Active Shooter Situation

Employees and customers are likely to follow the lead of managers during an emergency situation. During an emergency, managers should be familiar with their EAP, and be prepared to:

- Take immediate action
- Remain calm
- Lock and barricade doors
- Evacuate staff and customers via a preplanned evacuation route to a safe area

Assisting Individuals with Special Needs and/or Disabilities

- Ensure that EAPs, evacuation instructions and any other relevant information address to individuals with special needs and/or disabilities
- Your building should be handicap-accessible, in compliance with ADA requirements.



RECOGNIZING POTENTIAL WORKPLACE VIOLENCE

An active shooter in your workplace may be a current or former employee, or an acquaintance of a current or former employee. Intuitive managers and coworkers may notice characteristics of potentially violent behavior in an employee. Alert your Human Resources Department if you believe an employee or coworker exhibits potentially violent behavior.

Indicators of Potential Violence by an Employee

Employees typically do not just “snap,” but display indicators of potentially violent behavior over time. If these behaviors are recognized, they can often be managed and treated. Potentially violent behaviors by an employee may include one or more of the following (this list of behaviors is not comprehensive, nor is it intended as a mechanism for diagnosing violent tendencies):

- Increased use of alcohol and/or illegal drugs
- Unexplained increase in absenteeism; vague physical complaints
- Noticeable decrease in attention to appearance and hygiene
- Depression / withdrawal
- Resistance and overreaction to changes in policy and procedures
- Repeated violations of company policies
- Increased severe mood swings
- Noticeably unstable, emotional responses
- Explosive outbursts of anger or rage without provocation
- Suicidal; comments about “putting things in order”
- Behavior which is suspect of paranoia, (“everybody is against me”)
- Increasingly talks of problems at home
- Escalation of domestic problems into the workplace; talk of severe financial problems
- Talk of previous incidents of violence
- Empathy with individuals committing violence
- Increase in unsolicited comments about firearms, other dangerous weapons and violent crimes

MANAGING THE CONSEQUENCES OF AN ACTIVE SHOOTER SITUATION

After the active shooter has been incapacitated and is no longer a threat, human resources and/or management should engage in post-event assessments and activities, including:

- An accounting of all individuals at a designated assembly point to determine who, if anyone, is missing and potentially injured
- Determining a method for notifying families of individuals affected by the active shooter, including notification of any casualties
- Assessing the psychological state of individuals at the scene, and referring them to health care specialists accordingly
- Identifying and filling any critical personnel or operational gaps left in the organization as a result of the active shooter

LESSONS LEARNED

To facilitate effective planning for future emergencies, it is important to analyze the recent active shooter situation and create an after action report. The analysis and reporting contained in this report is useful for:

- Serving as documentation for response activities
- Identifying successes and failures that occurred during the event
- Providing an analysis of the effectiveness of the existing EAP
- Describing and defining a plan for making improvements to the EAP

References

Safety Guidelines for Armed Subjects, Active Shooter Situations, Indiana University Police Department, April 2007.

Safety Tips & Guidelines Regarding Potential “Active Shooter” Incidents Occurring on Campus, University of California Police.

Shots Fired, When Lightning Strikes (DVD), Center for Personal Protection and Safety, 2007.

Workplace Violence Desk Reference, Security Management Group International, www.SMGICorp.com

How to Plan for Workplace Emergencies and Evacuations, U.S. Department of Labor, Occupational Health and Safety Administration, OSHA 3088, 2001.



U.S. Department of Homeland Security

Washington, DC 20528

cfsteam@hq.dhs.gov

www.dhs.gov





HEAT ILLNESS & STRESS PREVENTION PLAN July 01, 2023



Transit

MANTECA TRANSIT
220 Moffat Blvd
Manteca, CA 95336
www.mtmtransit.com

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Section 1. Introduction

1.1. Purpose

MTM Transit, Inc. is committed to the health and safety of its employees and recognizes the potential problems caused by high temperatures in the work environment. The purpose of this plan is to minimize the detrimental effects of excessive heat on MTM employees who are required to work outdoors or within indoor environments with elevated temperatures. These include individuals such as welders, maintenance mechanics, and bus drivers.

Approvals

Name	Signature / Printed Name	Date
Transit Manager		07/01/2023
General Manager		07/01/2023
Operations Manager		07/01/2023
Safety Manager		07/01/2023
Maintenance Manager		07/01/2023

Note: The references herein to “MTM” or “MTM Transit” describe MTM Transit, Inc., to include all its subsidiaries, joint ventures, partnerships, and affiliates.

Section 2. Roles and Responsibilities

2.1. Safety Director

The safety director is responsible for the overall management and administration of the heat illness prevention plan, and for supporting its implementation by ensuring all necessary resources are allocated for its development.

2.2. Safety Manager

Under the leadership of the safety director, each division's safety manager is responsible for developing and implementing the procedures in this plan. Those responsibilities include but are not limited to:

- Ensure training is provided to all employees and their supervisors on the risks and prevention of heat stress, including how to recognize symptoms and respond when they appear.
- Develop and implement the preventive measures during periods of excessive heat. These preventive measures are based on the work being done, the environment, and the people doing the work.
- Implement and maintain effective water replenishment procedures.
- Ensure provisions of shade for employees who feel they need a preventive recovery break. Those employees may rest for at least 5 minutes in the shade. Shade is sufficient when objects do not cast a shadow in the shaded area and there is sufficient space for the employee to be comfortable. Shade is not adequate if the temperature in the shaded area prevents cooling.

2.3. Supervisors or other Lead Personnel

Supervisors are primarily responsible for the implementation of this program within their assigned work area; therefore, they have ultimate responsibility for the safety of their employees. Their responsibilities related to the prevention of heat-related disorders include but are not limited to the following:

- Ensure new employees receive heat stress training.
- Provide periodic safety meetings on heat stress and first aid during hot weather or during work in hot environments.
 - Evaluate each employee's acclimatization to the work environment.
 - Ensure adequate work/rest cycles are provided.
 - Ensure employees are provided shade for preventive recovery breaks.
 - Ensure employees are provided easy access to drinking water, at least 1 quart per employee per hour.
 - Encourage workers to drink water frequently.

-
- Ensure self and employees are familiar with the signs, symptoms, and appropriate first aid treatment for heat-related disorders.
 - Monitor employees for signs and symptoms of heat-related disorders.
 - Ensure the guidelines in this plan are followed when working during periods of exposure to excessive heat.

2.4. Employees

Employees who work in high heat environments or during periods of elevated temperatures have the following responsibilities:

- Attend heat illness prevention training.
- Understand the signs, symptoms, risk factors, and first aid treatment for heat-related illness.
- Take extra precautions if you are at high risk. High risk factors include: being older, overweight, overexertion, chronic medical conditions including diabetes, heart or lung disease, thyroid disease, or high blood pressure. If you take medications, you should check with your doctor to determine whether any of those medications put you at higher risk for heat-related disorders.
- Take time to acclimate to the heat and/or humidity. You will have a greater tolerance for heat if you limit your physical activity until you have become accustomed to the heat.
- Stay hydrated by drinking small amounts of cool water frequently throughout the day. Consider supplementing some of your water with a sports beverage to ensure the minerals and electrolytes your body needs. Be aware of sports beverages, as they contain high levels of salts and sugar; check with your physician before consuming.
- Wear appropriate clothing. Choose lightweight, loose fitting clothing.
- Monitor self and co-workers for signs and symptoms of heat-related disorders. Consider a buddy system.
- Perform work activities in compliance with this plan.

Section 3. Background

3.1. Risk Factors

Heat stress is influenced by several risk factors: climatic conditions, the work environment, demands of the work, clothing and personal characteristics.

Climatic and environmental conditions that affect the risk of heat-related disorders are air temperature and humidity, air movement, and the temperature of surrounding surfaces which effects radiant heat exchange.

Demands of the work influence the stress on the body's temperature regulation system. Individual responses to a given work load vary, but as an employee expends more energy the body's internal metabolic heat production rises. This increases stress on the cardiovascular system to regulate body temperature (i.e., by increasing blood flow to the skin). Work-related factors that influence heat stress include work rate, level of physical effort, and duration of activity.

Clothing characteristics such as insulation, permeability, weight, fit and ventilation affect the body's ability to regulate internal temperatures. Other factors that may increase the risk of heat-related disorders include additional equipment, the use of a respirator, or other personal protective equipment.

Personal characteristics such as age, weight, previous heat stress injury, underlying medical conditions (i.e., diabetes, cardiovascular disorders, chronic pulmonary disease, and thyroid disorders), medication use, and overall health and physical fitness contribute to an employee's susceptibility of contracting a heat-related illness.

Working in an environment with heat stress not only increases the risk for specific heat-related conditions such as heat exhaustion and heat stroke, but also increases the risk for other adverse events.

3.2. Heat-Related Disorders

The primary ways the human body regulates high temperatures are through blood flow and sweating. Blood is circulated to the skin, increasing the skin temperature and allowing the body to release excess heat. When the body senses the heat loss due to increased blood circulation is not enough to cool itself, sweating occurs. Evaporation of the sweat cools the skin and eliminates large quantities of heat from the body.

If the body is unable to release excess heat, it will store it. When this happens, the body's core temperature rises and the heart rate increases. If the body continues to store heat the person may begin to have difficulty concentrating, may become irritable and lose the desire to drink fluids.

3.2.1 Heat Stroke

- Heat stroke is the most serious heat-related illness. It occurs when the body becomes unable to control its temperature: the body's temperature rises rapidly, the sweating mechanism fails, and

the body is unable to cool down. When heat stroke occurs, the body temperature can rise to 106°F or higher within 10 to 15 minutes. Heat stroke can cause death or permanent disability if emergency treatment is not given. Symptoms of heat stroke include:

- Confusion, altered mental status, slurred speech
- Loss of consciousness (coma)
- Hot, dry skin or profuse sweating
- Seizures
- Very high body temperature
- Fatal if treatment delayed

First Aid

Take the following steps to treat a worker with heat stroke:

- Call 911 for emergency medical care.
- Stay with worker until emergency medical services arrive.
- Move the worker to a shaded, cool area and remove outer clothing.
- Cool the worker quickly with a cold water or ice bath if possible; wet the skin, place cold wet cloths on skin, or soak clothing with cool water.
- Circulate the air around the worker to speed cooling.
- Place cold wet cloths or ice on head, neck, armpits, and groin; or soak the clothing with cool water.

3.2.2 Heat Exhaustion

Heat exhaustion is the body's response to an excessive loss of the water and salt, usually through excessive sweating. Workers most prone to heat exhaustion are those that are elderly, have high blood pressure, and those working in a hot environment. Symptoms of heat exhaustion include:

- Headache
- Nausea
- Dizziness
- Weakness
- Irritability
- Thirst
- Heavy sweating
- Elevated body temperature
- Decreased urine output

First Aid

Treat a worker suffering from heat exhaustion with the following:

- Take worker to a clinic or emergency room for medical evaluation and treatment.
- If medical care is unavailable, call 911.
- Someone should stay with worker until help arrives.
- Remove worker from hot area and give liquids to drink.
- Remove unnecessary clothing, including shoes and socks.

- Cool the worker with cold compresses or have the worker wash head, face, and neck with cold water.
- Encourage frequent sips of cool water.

3.2.3 Rhabdomyolysis

[Rhabdomyolysis](#) is a medical condition associated with heat stress and prolonged physical exertion, resulting in the rapid breakdown, rupture, and death of muscle. When muscle tissue dies, electrolytes and large proteins are released into the bloodstream that can cause irregular heart rhythms and seizures, and damage the kidneys. Symptoms of rhabdomyolysis include:

- Muscle cramps/pain
- Abnormally dark (tea or cola colored) urine
- Weakness
- Exercise intolerance
- Asymptomatic

First Aid

Workers with symptoms of rhabdomyolysis should:

- Stop activity.
- Increase oral hydration (water preferred).
- Seek immediate care at the nearest medical facility.
- Ask to be checked for rhabdomyolysis (i.e., blood sample analyzed for creatine kinase).

3.2.4 Heat Syncope

Heat syncope is a fainting (syncope) episode or dizziness that usually occurs with prolonged standing or sudden rising from a sitting or lying position. Factors that may contribute to heat syncope include dehydration and lack of acclimatization. Symptoms of heat syncope include:

- Fainting (short duration)
- Dizziness
- Light-headedness during prolonged standing or suddenly rising from a sitting or lying position

First Aid

Workers with heat syncope should:

- Sit or lie down in a cool place.
- Slowly drink water, clear juice, or a sports drink.

3.2.5 Heat Cramps

Heat cramps usually affect workers who sweat a lot during strenuous activity. This sweating depletes the body's salt and moisture levels. Low salt levels in muscles causes painful cramps. Heat cramps

may also be a symptom of heat exhaustion. Symptoms are Muscle cramps, pain, or spasms in the abdomen, arms, or legs

First Aid

Workers with heat cramps should:

- Drink water and have a snack and/or carbohydrate-electrolyte replacement liquid (e.g., sports drinks) every 15 to 20 minutes.
- Avoid salt tablets.
- Get medical help if the worker has heart problems, is on a low sodium diet, or if cramps do not subside within 1 hour.

3.2.6 Heat Rash

Heat rash is a skin irritation caused by excessive sweating during hot, humid weather. Symptoms of heat rash include:

- Looks like red cluster of pimples or small blisters
- Usually appears on the neck, upper chest, groin, under the breasts, and in elbow creases

First Aid

Workers experiencing heat rash should:

- When possible, a cooler, less humid work environment is best treatment.
- Keep rash area dry.
- Powder may be applied to increase comfort.
- Ointments and creams should not be used.

Any additional questions regarding heat-related disorders (signs, symptoms, treatment, or prevention) shall be directed to the Safety Manager or Supervisor.

For news and information regarding weather:

- National Weather Service Forecast Office: www.wrh.noaa.gov/mtr/

NOAA's National Weather Service

Heat Index

Temperature (°F)

Relative Humidity (%)	80	82	84	86	88	90	92	94	96	98	100	102	104	106	118	110
40	80	81	83	85	88	91	94	97	101	105	109	114	119	124	130	136
45	80	82	84	87	89	93	96	100	104	109	114	119	124	130	137	
50	81	83	85	88	91	95	99	103	108	113	118	124	131	137		
55	81	84	86	89	93	97	101	106	112	117	124	130	137			
60	82	84	88	91	95	100	105	110	116	123	129	137				
65	82	85	89	93	98	103	108	114	121	128	136					
70	83	86	90	95	100	105	112	119	126	134						
75	84	88	92	97	103	109	116	124	132							
80	84	89	94	100	106	113	121	129								
85	85	90	96	102	110	117	126	135								
90	86	91	98	105	113	122	131									
95	86	93	100	108	117	127										
100	87	95	103	112	121	132										

Likelihood of Heat Disorders with Prolonged Exposure or Strenuous Activity

- Caution
- Extreme Caution
- Danger
- External Danger

Section 4. Preventive Controls

A control is a mechanism used to minimize or eliminate an exposure to a hazard, such as heat. There are three types of controls that can be implemented: administrative, engineering, and personal protective equipment. The following summarizes how these types of controls can be used to reduce exposure to heat hazards and heat-related illnesses and injuries. Each person and situation is unique, so controls and their application will vary.

4.1. Administrative Controls

Administrative controls are strategies used by Supervisors to limit exposure to a hazard. For example, changes to work schedules can limit the amount of time an employee is exposed to the elevated temperatures. The following are all examples of administrative controls:

1. Training – is the key to good work practices. Unless employees understand why the program is so important, it will have little chance of success.
2. Acclimatization – Employees need to adapt to new temperatures. This adaptation period may take a few days.
3. Weather Conditions – Check weather conditions frequently during the day and adjust the work schedule accordingly. It might be appropriate to change the actual hours of work to minimize working during the heat of summer months. Heavy work should be scheduled for the cooler hours of the day.
4. Work/Rest Cycles – Heavy and minimal work activities should be alternated. Tasks should be rotated among workers. Employees should be allowed sufficient breaks in a cool area to avoid heat stress and promote recovery. Shade or an air-conditioned break room should be provided. This air-conditioned environment must already have the air conditioner running and be cooler than outside. Employees who feel as though they are suffering from heat-related disorders shall be given recovery breaks in a shaded area and provided first aid treatment appropriate for their symptoms.
5. Fluid Intake – Cool fluids such as water or electrolyte replacement drinks need to be conveniently available to workers so they can drink at least 8 ounces of liquids every 20 minutes. The ideal temperature for liquids should be 50–60 degrees Fahrenheit. For remote outdoor work locations this means providing these fluids in such a way so that they can be transported by employees to the location. There should either be enough fluids on hand for all employees or the ability and procedures to replenish this supply throughout the day.

4.2. Engineering Controls

Engineering controls are physical changes made to the work environment. Heat may be controlled through general ventilation and spot cooling by local exhaust ventilation at the point of high heat production. Shielding may be needed for protection against radiant heat sources. Another control

measure would be the use of fans to create air flow. Outdoor work areas must have a shaded area accessible to the employees. Shaded areas can be created by using tarps or canopies. To be considered “shade” the employee must not cast a shadow while in the shade.

4.3. Personal Protective Equipment (PPE)

Some examples of PPE that help in the prevention of heat-related disorders include hats, loose-fitting clothing, cool vests, etc. In some cases PPE such as impermeable clothing, respirators, coveralls, etc. may increase the risk of developing a heat-related disorder. This type of equipment shall be used when necessary. When use of this type of PPE is necessary during work outdoors in high temperatures, other administrative or engineering controls should be considered to reduce the risks associated with the development of heat-related disorders. When selecting appropriate clothing consider the work you will be doing and any other hazards associated with the job. Be careful that the loose-fitting clothing is not too loose fitting; you do not want to create another hazard of clothing that could get caught in moving parts and/or equipment.

4.4. Work Practice Recommendations

- Limit time in the heat and/or increase recovery time spent in a cool environment.
- Reduce the metabolic demands of the job.
- Use special tools (i.e., tools intended to minimize manual strain).
- Increase the number of workers per task.
- Train supervisors and workers about heat stress.
- Implement a buddy system where workers observe each other for signs of heat intolerance.
- Require workers to conduct self-monitoring and create a work group (i.e., workers, a qualified healthcare provider, and a safety manager) to make decisions on self-monitoring options and standard operating procedures.
- Provide adequate amounts of cool, potable water near the work area and encourage workers to drink frequently.
- Implement a heat alert program whenever the weather service forecasts that a heat wave is likely to occur.
- Institute a heat acclimatization plan and increase physical fitness.

4.5. Hydration

Employers should provide the means for appropriate hydration of workers.

- Water should be potable, <15°C (59°F), and made accessible near the work area.
- Estimate how much water will be needed and decide who will obtain and check on water supplies.
- Individual, not communal, drinking cups should be provided.
- Encourage workers to hydrate themselves.

Workers should drink an appropriate amount to stay hydrated.

- If in the heat <2 hours and involved in moderate work activities, drink 1 cup (8 oz.) of water every 15–20 minutes.
- During prolonged sweating lasting several hours, drink sports drinks containing balanced electrolytes.
- Avoid alcohol and drinks with high caffeine or sugar.
- Generally, fluid intake should not exceed 6 cups per hour.

4.6. Acclimatization

Acclimatization is the beneficial physiological adaptations that occur during repeated exposure to a hot environment. These physiological adaptations include:

- Increased sweating efficiency (earlier onset of sweating, greater sweat production, and reduced electrolyte loss in sweat).
- Stabilization of the circulation.
- The ability to perform work with lower core temperature and heart rate.
- Increased skin blood flow at a given core temperature.

To acclimatize workers, gradually increase their exposure time in hot environmental conditions over a 7-14 day period. New workers will need more time to acclimatize than workers who have already had some exposure.

Some additional information on maintaining acclimatization:

- It can often be regained in 2 to 3 days upon returning to a hot job.
- It appears to be better maintained by those who are physically fit.
- Seasonal shifts in temperatures may result in difficulties.
- Working in hot, humid environments provides adaptive benefits which also apply in hot, desert environments, and vice versa.
- Air conditioning will not affect acclimatization.

4.7. Rest Breaks

Employers should ensure and encourage workers to take appropriate rest breaks to cool down and hydrate.

- Permit rest and water breaks when a worker feels heat discomfort.
- Modify work/rest periods to give the body a chance to get rid of excess heat.
- Assign new and unacclimatized workers lighter work and longer, more frequent rest periods.
- Shorten work periods and increase rest periods:
 - As temperature, humidity, and sunshine increase.
 - When there is no air movement.
 - If protective clothing or equipment is worn.
 - For heavier work.

Section 5. Training

Heat illness prevention training will be provided annually along with periodic heat-related safety meetings. Trainings shall include the following:

- Knowledge of the hazards of heat stress and risk factors for heat-related illness
- Importance of drinking small quantities of water often
- Recognition of predisposing factors, danger signs, and symptoms
- Importance of immediately reporting signs or symptoms of heat-related illness to the supervisor
- Awareness of first-aid procedures for, and the potential health effects of, heat stroke
- Employee responsibilities in avoiding heat stress
- Procedures to follow when contacting emergency medical services
- Dangers of using drugs, including therapeutic ones, and alcohol in hot work environments
- The importance of acclimatization
- Use of protective clothing

In addition, supervisors should be trained on the following:

- How to implement appropriate acclimatization.
- What procedures to follow when a worker has symptoms consistent with heat-related illness, including emergency response procedures.
- How to monitor weather reports.
- How to respond to hot weather advisories.
- How to monitor and encourage adequate fluid intake and rest breaks.

Section 6. Record Keeping

Documentation of safety meetings and training is the responsibility of the safety manager and/or his/her designee. Training must be documented using written sign-up sheets that show at least the date of training, the names of personnel in attendance, topics discussed, and the instructor's signature. Copies of any written training materials will be retained to document specific training content.

Section 7. Acknowledgement Forms

RECEIPT AND ACKNOWLEDGEMENT OF POLICY AND TRAINING HEAT ILLNESS PREVENTION PLAN

I _____ confirm that I have received a copy of the document titled: "Heat Illness Prevention Plan" and understand its provisions.

I further confirm that I have received training pursuant to this Plan.

Signed: _____

Title: _____

Date: _____

Information Security Program Handbook

Version 1.7

1/19/2019



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Revision History

Date	By	Revision	Comment
11/18/2016	Curtis Simms	1.0	Initial draft created by Sr. Manager, Security & Technology Operations for HITRUST v8.1
1/4/2016	Karen Turner	1.2	DRAFT review and modifications by Security Auditor
2/4/2017	Chris Hoffner	1.3	Approved by Sr. Director, Infrastructure, Security & Architecture
3/30/2017	Heather Pekar	1.4	Approved by VP of Technology
4/19/2017	Alaina Macia	1.5	Approved by Chief Executive Officer
12/31/2018	Karen Turner	1.6	Annual review/updates
1/09/2019	David Meyer	1.6	Approved by Manager, Enterprise Security - Revised draft with additional updates
1/16/2019	Chris Hoffner	1.7	Formatting change correcting page order
1/17/2019	Heather Pekar	1.7	Approved by VP of Technology
1/18/2019	Alania Macia	1.7	Approved by CEO

Executive Summary

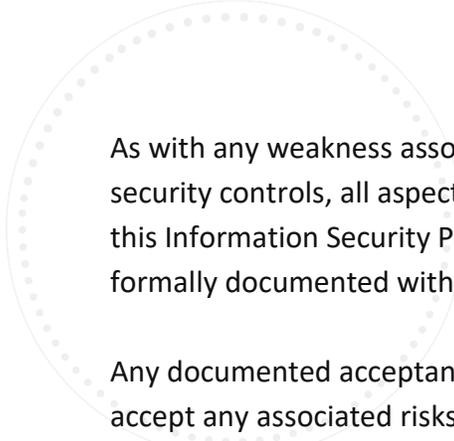
Overview

The Enterprise Security team has been tasked with supporting the protection of both company and client information assets, and information systems from occurrences that could adversely impact their confidentiality, integrity or availability. The security team works to ensure protective controls are always in place and are commensurate with the level of sensitivity of the information resources owned and managed by MTM and its affiliated companies. By formally defining process and policy, the security team is assuring consistency in the implementation of controls which will strengthen the overall security posture and support compliance with client, state and federal requirements. Each company department must be responsive and responsible in supporting all security requirements.

This Information Security Handbook is designed to outline the responsibilities and control requirements of each department, including Information Technology. The goal of the Information Security Handbook and accompanying standards (see Information Security Program policy) is to provide a single summary of the minimum information, and cyber security criteria needed, to protect business critical functions, and the information assets and technologies that support them. The document is based on public laws, National Institute of Standards and Technology (NIST) standards, HITRUST CSF (Common Security Framework), and other industry standard guidelines that address specific security issues, concerns, and experiences.

This handbook should be treated as subordinate to the Employee Handbook, and it carries the same weight, force and effect as such. The handbook takes precedence over any former existing security plans or directives and memorandums regarding security policies and standards wherever the same types of requirements were previously addressed, and may conflict with this handbook.

Policies, standards and procedures play important roles in the effective implementation of enterprise-wide information security programs, and the success of the resulting security measures employed to protect MTM and affiliated company information systems. Thus, the enterprise security team must develop, promote, and recommend formal, documented policies and procedures governing security requirements, and ensure their effective implementation.



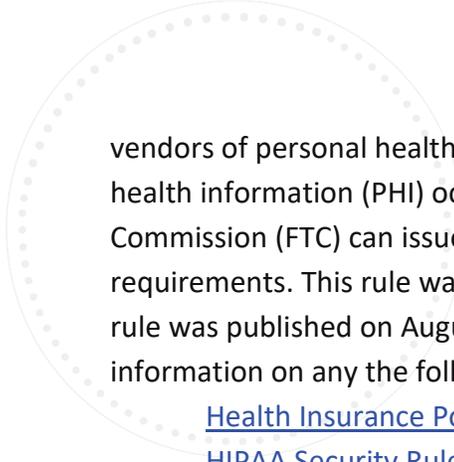
As with any weakness associated with inadequate management, operational or technical security controls, all aspects of noncompliance with the policies and standards contained within this Information Security Program Handbook require those aspects of non-compliance be formally documented within the enterprise security department risk management program.

Any documented acceptance of risk(s) requires the Security Officer formally acknowledge and accept any associated risks, either in writing or electronically. In considering whether to accept the risks indefinitely or for some specified time, the risk acceptance documentation must identify any conditions and constraints under which those risks will be accepted. When a risk is deemed unacceptable indefinitely, the weakness must be incorporated into an immediate Plan of Action and Milestones (POA&M) for remediation.

On August 21, 1996, Congress enacted Public Law, 104-191, The Health Insurance Portability and Accountability Act of 1996 (HIPAA). HIPAA requires effective information security controls over Information Technology (IT) to support the protection of healthcare data. HIPAA was designed to strengthen health insurance coverage under Title I of HIPAA. Title II of HIPAA focuses on Administrative Simplification (AS) provisions which requires the establishment of national standards for electronic healthcare transactions and national identifiers for providers, health insurance plans, and employees.

Title II includes the Privacy and Security Rule. The Privacy Rule was established on April 14, 2003. The Security Rule took effect on April 21, 2003. The Privacy Rule regulates the use and disclosure of Protected Health Information (PHI) held by “covered entities” (CE) which contain healthcare clearing houses, employer sponsored health plans, health insurers, and medical service providers that engage in certain transactions. By federal regulations, the Department of Health and Human Services (HHS) extended the HIPAA privacy rule to independent contractors of CE’s who fit the definition of “business associates” (BA). PHI is any information held by a CE which concerns health status, provision of health care, payment for health care that can be linked to an individual. An individual’s medical record or payment history that identifies a member with medical information is protected under HIPAA laws and regulations.

In January 2013, HIPAA was updated via the Final Omnibus Rule. This included updates to the Security Rule and Breach Notification portions of the HITECH Act. The Health Information Technology for Economic and Clinical Health Act was enacted under Title XIII of the American Recovery and Reinvestment Act of 2009, Public Law 111-5. HITECH is focused on improving health care quality, safety, and efficiency. This includes standardized electronic health records (EHR) and report of data breaches. This includes civil and criminal penalty to pertinent business associates,



vendors of personal health records (PHR) and related entities if a breach of unsecured protected health information (PHI) occurs. Under the HITECH ACT, both HHS and the Federal Trade Commission (FTC) can issue regulations associated with the new breach notification requirements. This rule was published in the Federal Register on August 24, 2009, and the FTC rule was published on August 25, 2009. The Security Rule complements the Privacy Rule. For more information on any the following federal law requirements, please click on the link:

[Health Insurance Portability and Accountability Act \(HIPAA\) HIPAA Privacy Rule](#)

[HIPAA Security Rule](#)

[HIPAA Breach Notification Rule](#)

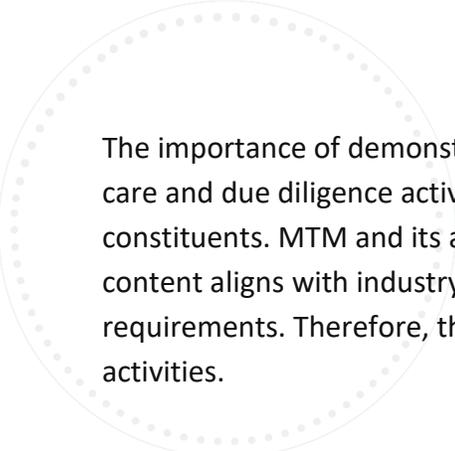
[Health Information Technology for Economic and Clinical Health Act \(HITECH\) Health and Human Services \(HHS\) Breach Notification Rule](#)

[Federal Trade Commission \(FTC\) Breach Notification Rule](#)

Principles of Due Care & Due Diligence

The need for MTM and affiliated companies to keep pace with the ever-changing statutory landscape and technology environment is essential in maintaining information security and business viability. Due care and due diligence practices must be ingrained into MTM and its affiliated companies' culture. This is essential to facilitate the constant self-re-evaluation and assessment necessary for both statutory and technology industry best practices, as well as compliance validation required to initiate necessary changes and engage in continuous process improvement.

The terms due care and due diligence are used in the fields of finance, securities, and law. These terms describe the 'reasonable and prudent person' rule. A prudent person takes due care to ensure that everything necessary is done to operate the business by sound business principles and in a legal ethical manner. A prudent person is also diligent (i.e., mindful, attentive, and ongoing) in their due care of the business. In the business world, stockholders, customers, business partners, and government regulators have the expectation that corporate officers will run the business in accordance with accepted business practices and in compliance with laws and other regulatory requirements. In the public sector, constituents and political leaders hold the same expectations of government agency officers. In addition to these expectations being a motivating force for officers, Federal Sentencing Guidelines and State Statutes now make it possible to hold both private and public sector organization officers liable for failing to exercise due care and due diligence in the management of their information privacy/security practices.



The importance of demonstrating due care and due diligence cannot be expressed enough. Due care and due diligence activities are the foundation for establishing and maintaining the trust of constituents. MTM and its affiliated companies' Information Security Program Handbook's content aligns with industry standards, and complies with statutory and administrative requirements. Therefore, the document itself expresses both due care and due diligence activities.

Program Objectives

The Information Security Program Handbook objective is to establish organizational information security standards and requirements, which specify how information assets are safeguarded.

Information security standards assist in appropriate data classification, technology classification, implementation of adequate security controls, as well as recommended business security actions and operational measures to protect company and client information assets. The company's security department is committed to creating and maintaining an environment that protects company and client information assets from accidental or unauthorized use, modification, disclosure, destruction, or theft. Adherence to information security standards will safeguard the confidentiality, integrity, and availability of information assets and will protect the interests of the MTM, its affiliated companies, personnel, contractors, business partners, and clients.

This handbook's intent is to create and implement an environment that:

- Protects information and technologies critical to the organization and its clients.
- Protects information as mandated by State and federal statutes, regulations, and administrative requirements.
- Protects confidential and sensitive information.
- Reinforces company and client reputation as an institution deserving of trust. Complies with due diligence standards for the protection of information and technologies.
- Assigns responsibilities to relevant company officers, executives, managers, personnel, contractors, and business partners.
- Protects company physical resources and those physical resources entrusted to the company.

The handbook helps streamline the foundational security controls that are a core part of all security frameworks, ensuring all aspects of the organization’s data storage and processing systems are: Authorized; Hardened; Free of significant vulnerabilities and; Protected against rogue administrative or other actions

Information Security Committee

The Information Security Committee manages the responsibilities identified by HITRUST for the Information Security Committee, as defined in domain one, information security management program.

IT Steering Committee

The Architecture Review Board (ARB) manages the responsibilities identified by HITRUST for the IT Steering Committee, as defined in domain one, information security management program.

Assessment Services

MTM’s enterprise security team facilitates the security assessments services program for the organization. This includes coordinating third party testing for maintaining compliance as required by the business and its clients. MTM’s security team personnel at minimum include approved security certifications that meet Department of Defense (DoD) Directive 8570 for performing computer network defenders (CND) services. Security assessment services include at minimum:

Security Assessment Type	Time Requirement
Penetration Test	Annually by 3 rd party and Enterprise Security Team
Social Engineering	Annually by 3 rd party and Enterprise Security Team
Wireless	Annually by Enterprise Security Team
Physical	Annually by Enterprise Security Team
Web Applications	Annually by Enterprise Security Team
Vulnerability	Quarterly by Enterprise Security Team
Infrastructure	Quarterly by Enterprise Security Team
HITRUST CSF Audit	Annually by Enterprise Security Team



Security assessment reports are maintained and assessable indefinitely, but at minimum for the prior twelve (12) month period. These reports may not be shared with any outside party without prior approval by the company's Enterprise Security Manager or the Sr. Director, IT Infrastructure, Security & Architecture.

Confidentiality, Integrity, and Availability (CIA)

The enterprise security team and information security program must ensure that core concepts of availability, integrity, and confidentiality are supported by executives and staff by having adequate security controls designed to mitigate or reduce the risks of loss, disruption, or corruption of information owned by clients and the organizations. The CIA triad is an industry security best practice to ensure the organization's success in building a strong security foundation and practice.

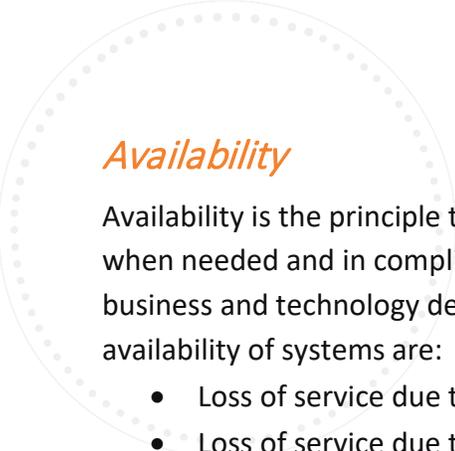
Confidentiality

Confidentiality supports the principle of "least privilege" by providing that only authorized individuals, processes, or systems must have access to information on a need-to-know basis. The level of access employees and authorized individuals are provisioned must only be at the level necessary for them to perform their job function. Every employee and authorized individual is required to follow the company's policies and standards when viewing and/or using member or sensitive data, based on the data classification set for that information. If an employee or authorized individual has questions regarding the classification and handling of such data, they should seek guidance from the Enterprise Security team.

Integrity

Integrity is the principle that information should be protected from intentional, unauthorized, or accidental changes. Information stored in files, databases, systems, and networks must be relied upon to accurately process transactions and provide accurate information for business decision making. Controls are put into place to ensure that information is modified through accepted practices.

Controls that help ensure integrity include management controls for segregation of duties, approval checkpoints in the systems development life cycle (SDLC), and implementation of testing practices that assist in providing information integrity.



Availability

Availability is the principle that ensures that information is available and accessible to users when needed and in compliance with established service level agreements between lines of business and technology department leadership. The two primary areas affecting the availability of systems are:

- Loss of service due to malicious action, such as Denial-of-Service attacks
- Loss of service due to a disaster; man-made (e.g., poor capacity planning resulting in system crash, outdated hardware, and poor testing resulting in system crash after upgrade) or natural (e.g., earthquake, tornado, blackout, hurricane, fire, and flood).

The lack of appropriate controls can increase the risk of viruses, destruction of data, external penetration, or denial-of-service (DoS) attacks.

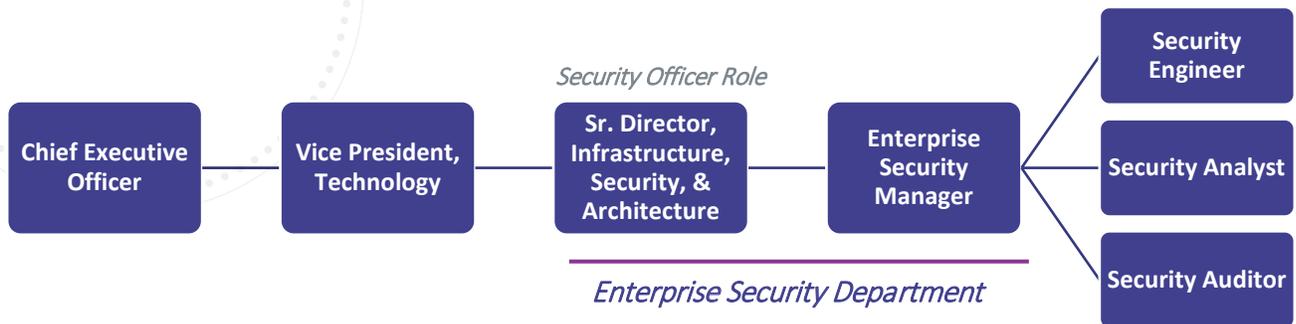
Duties and Responsibility

The Enterprise Security team is responsible for providing the organization with a comprehensive security approach to detect, report, and respond to risks impacting our infrastructure systems, applications, client data, business intellectual property and brand. A primary objective is to provide the organization with strategic and tactical information security services, provide support in maintaining regulatory compliance, and provide risk management services for the business to assess and react accordingly. The team will also provide audit services to help identify and monitor service organizational controls as required by State and federal law, and clients. Audits are aligned to the business needs for maintaining Service Organization Control (SOC) compliance and Health Information Trust Alliance (HITRUST) accreditation.

The three (3) primary security team business objectives are:

1. **Protect Client Information:** physical and logical access controls, and client data technology security practices
2. **HIPAA Security Rule Compliance:** manage and recommend compliance and initiatives for the HIPAA Security Rule
3. **Protect Company Information:** physical and logical access controls, and company data technology security practices

Security Operations Organization Structure



Handbook Approval Requirements

Enterprise Security Department

The information security program handbook is reviewed annually, at minimum, by the enterprise security leadership team.

- Vice President, Technology
- Senior Director, HIPAA Security Officer
- Manager, Enterprise Security

Executives

The information security program handbook is reviewed annually, at a minimum, by the following executives to ensure information contained herein is accurate and supported by the organization.

- Chief Executive Officer
- Executive Vice President, General Counsel
- Vice President, Technology
- Chief Human Resource Officer

The handbook is official and effective immediately upon the Chief Executive Officer's approval.

Company, Affiliated Companies, & Employee Responsibilities

All company and company affiliates, including employees, will organize, implement and maintain to the requirements of the Security Program Handbook that ensures efficient, effective, uniform, and compliant security for all interior and exterior information security and technology assets. This program will be built upon essential target component areas: Infrastructure, Policy and Procedures, Technical Implementation, Security and Technology Architecture, System and Software Lifecycle Development, Security Tool Analysis and Evaluation, Incident Response and Forensics, Threat Analysis and Awareness, Vulnerability and Penetration Assessments, Security Training and Education, Compliance and Validation, and Certification, Accreditation Security and Procurement must be adequately addressed in all phases of the organization.

The organization will support and agree to the following responsibilities within the enterprise security team as requirements for all tasks and projects that include information assets:

- Approve to work with business process owners to categorize sensitivity of information and information systems;
- Leverage enterprise architecture to identify interdependencies and interrelationships before a project is in an active state with production data for MTM and clients;
- Approve to conduct risk assessments for IT systems and computing devices;
- Approve to conduct formal certification and accreditation control audits as needed on all IT systems;
- Approve security budget to meet necessary requirements for client contract and regulatory compliance;
- Approve to monitor system and application configuration, as well as any changes to the configuration and processes of all systems to identify any potential impact to the integrity, availability or confidentiality of information assets or information systems;
- Approve to manage an effective Security Awareness Training Program for employees;
- Approve to manage an effective Risk Assessment Program for all IT systems and computing devices;
- Approve to manage an Incident Response Program that includes threat awareness and forensic capabilities as needed;
- Approve to manage a Cybersecurity Program that includes threat awareness;
- Approve to facilitate annual external security assessments conducted by third parties as required for application, system, and human weaknesses;
- Approve monitoring for all IT production, development and test systems using audit trails, controls logs and other mechanisms;

- 
- Approve employee security investigations as needed working with Legal and HR;
 - Approve audit of inventory of all IT systems, computing devices and licensing;
 - Approve to disseminate company policy and procedures to all personnel and report employee violations to HR for discipline;
 - Approve to develop security content policy and procedures, and improve the information security program as required for client and regulatory compliance;
 - Approve to respond to clients regarding information and security requirements, risks, and deficiencies with oversight by the Program Governance department.

Contractor & Vendor Responsibilities

All contractors and vendors will organize, implement and adhere to the requirements of the Information Security Program which will thus ensure efficient, effective, uniform, and compliant security for all interior and exterior information security and technology assets. All requirements as outlined in the previous section (*Company, Affiliated Companies, & Employee Responsibilities*) apply to contractors and vendor responsibilities. All contractors and vendors who may have access to member data is required to sign both a non-disclosure agreement (NDA), and a business associate agreement (BAA). The enterprise security team will review these agreements with our Legal and Procurement teams.

Vice President, Technology

The Vice President of Technology has the responsibility for ensuring the following security requirements are authorized and approved for company use:

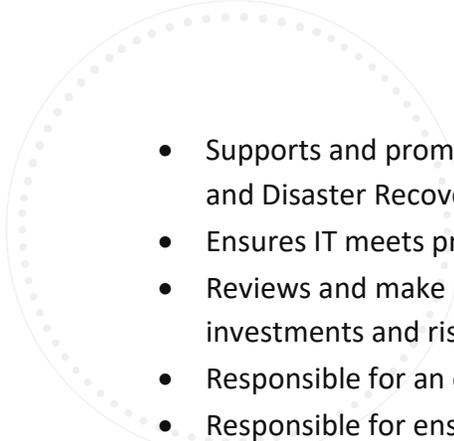
- Designate a senior management position to oversee and operate the Information Security program (Enterprise Security) and perform the duties and responsibilities of the company Information and HIPAA Security Officer;
- Approve and support an enterprise-wide information security program;
- Approve and support information security policies, procedures, and control techniques to address all applicable requirements and laws within all areas of technology ;
- Ensure compliance with applicable information security requirements and final acceptance of all risks;
- Perform, or delegate responsibility, as representative for security program topics and responsibilities to MTM's executive team and clients;
- Report annually to the Chief Executive Officer on the effectiveness of the information security program, including progress of remedial actions that require executive attention.

Senior Director, Infrastructure, Security & Architecture (HIPAA Security Officer)

An Information and HIPAA Security Officer is appointed in the organization and is responsible for management of information security and technology policies, procedures, systems security configurations, physical security, and logical access in order to maintain the confidentiality, integrity and availability of all organizational health care information systems.

Other responsibilities include implementing and supporting all information security initiatives throughout the organization and acting as the primary resource for all security matters. This role includes working with company executives to ensure financial obligations are met to ensure security projects are a priority. The role is responsible for the oversight, implementation, and monitoring of all requirements levied by clients, State, and federal rules and regulations.

- Responsible for information security requirements for regulatory compliance;
 - Heads the enterprise security team with the mission and resources to assist in ensuring compliance with state and federal laws and mandates regarding information security for member health records;
 - Assesses risk and magnitude of the harm resulting from unauthorized access, use, disclosure, disruption, modification, or destruction of information and information systems that support the operations and assets of the company;
 - Approves and maintains risk-based acceptance, cost-effective information security policies, procedures, and control techniques to address all applicable requirements throughout the life cycle of each information system to ensure compliance with applicable requirements;
 - Facilitates development of subordinate plans for providing adequate information security for networks, facilities, and systems or groups of information systems;
 - Periodically tests and evaluates the effectiveness of information security policies, procedures, and practices;
 - Implements and maintains a process for planning, implementing, evaluating, and documenting remedial action to address any deficiencies in the information security policies, procedures, and practices of the company;
 - Ensures the preparation and maintenance of plans and procedures to provide continuity of operations for information systems that support the operations and assets of the company;
 - Supports the company Vice President, Technology, in annual reporting to the Chief Executive Officer and executives on the effectiveness of the information security program, including progress of remedial actions;
 - Collaborates in identification of material weaknesses and assists in formulating mitigation strategies, as required;

- 
- Supports and promotes IT Contingency Planning efforts including Business Continuity and Disaster Recovery Planning;
 - Ensures IT meets privacy laws and guidelines required for IT systems and data;
 - Reviews and make recommendations to the Vice President, Technology, for all security investments and risk acceptance requests;
 - Responsible for an effective security architecture;
 - Responsible for ensuring an effective patch management and vulnerability scanning program.

Manager, Enterprise Security

The Manager of Enterprise Security has the responsibility for ensuring the following security requirements are operational and meeting overall effectiveness in support of the Director of Security:

- Serve as the central contact for managing the security operations and all related information security matters;
- Provide subject matter guidance to all company personnel, legal, and people and culture departments;
- Monitor audit and compliance to ensure that all systems are properly secured prior to actual operation, and when a significant system change occurs which impacts the system's security posture;
- Assists the organization in responding to computer fraud and security investigations;
- Assist in the creation and enforcement of all IT and security policy and procedures to ensure client and regulatory compliance;
- Ensure compliance with IT policy and procedures;
- Oversee physical security requirements;
- Manage the organizations Information Security Awareness Program;
- Manage the identification and mitigation of all system vulnerabilities;
- Participate in the overall Information Security Program and coordinate with the Director of Security to ensure security operations, budget requirements, and business continuity and disaster recovery plans are in place;
- Develop and implement procedures for detecting, reporting, and responding to security incidents;

Key Performance Indicators

Enterprise Security will measure key areas of performance to remain continually aware of security trending, current posture, managing risks to the organization that impact security, and overall compliance requirements. Key performance indicators (KPI's) are measured through a variety of different processes, but at minimum will produce quarterly reports to the Security Officer outlining risks and security threats. The following are KPI's performed based on security operations management team.

Area Measured	Key Performance Indicators
Risk Detection	% of risks identified unmitigated, including management acceptance (quarterly)
Security Assessments	% of vulnerabilities unmitigated within assessments, including management acceptance (quarterly)
Product Security	% of infrastructure security for unmitigated workstation security endpoint and encryption requirements and password policies for user/admins quarterly
Regulatory Compliance	Audit review identifying gaps of SOC1 and HITRUST for IT/Security requirements; including management acceptance (quarterly)
Client Audits	% of successful client audits with remediation acceptance by the client and management acceptance

Information Security Workforce Improvement

Implementing an effective security team requires support by management and the organization to continue training efforts for employing a high-quality security workforce. This is required in hiring, developing staff for leadership, and ensuring security staff compensation is competitive and aligned with protecting company assets from risks and cyber related threats. The organization fills security positions with qualified security personnel. The team will be augmented with outside consultants and contractors as needed. Improvement efforts are completed using a combination of requirements.

- Corporate Training Programs
- Company Security Team Training Events
- Knowledge College (Skillsoft, online library)
- Industry Conference Events
- Individual Training and Certification Events

Security Incident Management

Security incidents and investigations are managed and enforced by Legal, Quality Management, and Enterprise Security. Policy, procedures, and an Incident Response Plan are in place to provide incident management and procedures for violations and data breach investigations.

MTM requires all suppliers and vendors per the Business Associate Agreement to immediately report any data breaches.

All investigations that involve the Enterprise Security Team will include HR and or Legal, and the IRT team, as defined in MTM's Incident Response Plan, will maintain documentation of the incidents. Incidents or investigations documentation are maintained and available indefinitely, but at minimum for the prior twelve (12) month period. Only the Chief Executive Officer, Vice President of Technology, Security Officer, Security Team, HR, and or Legal are allowed access to incidents and investigations documentation.

MTM has established company policies and procedures for:

- Security Incident Response and Reporting Policy (IT)
- Security Investigations Procedures (IT)
- Reporting and Handling of Accidents and Incidents Policy (QM) Fraud, Waste, and Abuse Prevention and Investigation Policy (QM)
- Fraud, Waste, and Abuse Prevention and Investigation Procedures (QM) General Counsel Oversight Compliance Policy (QM)
- Breach Notification of Unsecured PHI HIPAA HITECH Policy (QM) Breach Notification of Unsecured PHI HIPAA HITECH Procedure (QM) Regulatory Compliance Policy (Legal)
- HIPAA Violation Discipline Procedure (People and Culture; HR)

HIPAA/HITECH ACT and State Data Breach Notification Laws

MTM has implemented Policy 470 Breach Notification of Unsecured PHI, HIPAA/HITECH and the Enterprise Security Team will report any known or discovered potential data breach to MTM's legal team for maintaining state and federal notification laws. MTM supports and follows all regulations for breach notifications as stated on HHS' website: <http://www.hhs.gov/hipaa/for-professionals/breach-notification/breach-reporting/index.html>

Legal and Regulatory Compliance

The enterprise security team works closely with both legal and procurement to ensure IT and security requirements are met under contract, as well as state and federal regulation. Security is included as part of all executed procurement agreements to ensure security requirements are met and concerns protecting information data assets are properly addressed. The security team manager oversees IT related non-disclosure agreements (NDA) and business associate agreements (BAA) for regulatory compliance efforts.

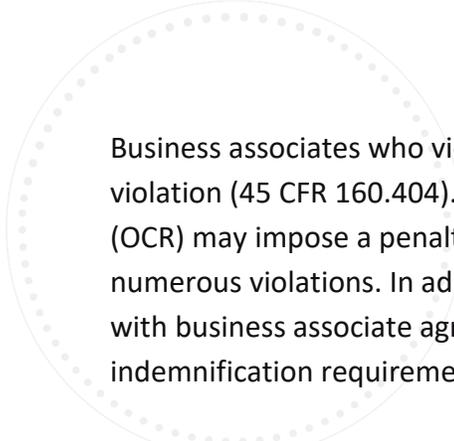
Business Associates

As identified in the contractor and vendor section, the HIPAA privacy and security rule requires that a business associate that “creates, receives, maintains, or transmits” protected health information (PHI) while performing services on behalf of MTM and its affiliated companies is required to complete a business associate agreement (BAA) before access is granted.

Business associates are defined as contractors and vendors that perform general consulting, management, billing, coding, transcription, marketing, data storage, IT consulting, documentation, data transmissions, or any other type of service that routinely accesses PHI.

For more information, please see [Business Associate Contracts](#) provided by Health and Human Services (HHS). All company and affiliated BAA's are stored with the contract by the Legal team. Business Associate requirements under HIPAA include:

- Perform and document a security risk assessment of its information systems containing electronic PHI (45 CFR 164.308);
- Implement administrative, technical, and physical safeguards to protect the integrity, confidentiality, and availability of electronic PHI (45 CFR 164.300);
- Execute and perform per the BAA with the covered entity (45 CFR 164.308(b), 164.314(a), 164.502(e), and 164.504(e));
- Report security incidents and privacy breaches to the covered entity (45 CFR 164.514(e));
- If the business associate uses subcontractors or other entities to provide any services for the covered entity involving PHI, execute business associate agreements with the subcontractors (45 CFR 164.314(a) and 164.504(e)).



Business associates who violate HIPAA may be subject to penalties of \$100 to over \$50,000 per violation (45 CFR 160.404). If the violation resulted from willful neglect, the Office of Civil Rights (OCR) may impose a penalty of at least \$10,000 per violation. A single breach may result in numerous violations. In addition to regulatory penalties, business associates who fail to comply with business associate agreements may also be liable for contract damages and or indemnification requirements, as set forth in the business associate agreement.

Approved Frameworks

The majority of security standards and control requirements are provided using industry standard guidelines from the National Institute of Standards and Technology (NIST) and the Health Information Trust Alliance (HITRUST). The enterprise security team implements standards and requirements that supports the organizations regulatory compliance and client requirements.

HITRUST CSF

The Health Information Trust Alliance (HITRUST) was established for promoting the security of healthcare information, while allowing for the adoption of health information systems and exchanges. HITRUST believes security is critical to the broad adoption, utilization, and confidence in health information systems, medical technologies, and electronic exchanges of health information. It also believes security is critical to realizing the promise for quality improvement and cost containment in America's healthcare system.

Under HITRUST, the Common Security Framework (CSF) incorporates the security controls and requirements from multiple standards, regulations and business requirements applicable in the healthcare industry. HITRUST harmonizes these requirements into a single set of controls and provides references back to the sources for compliance purposes. The authoritative sources incorporated and referenced in the CSF include: HIPAA, HITECH, Payment Card Industry Data Security Standards (PCI DSS), Control Objectives for Information and Related Technology (COBIT), National Institute of Standards and Technology (NIST), International Organization for Standardization (ISO), and the Federal Trade Commission (FTC). The resulting framework is no more burdensome than the requirements to which healthcare organizations and Business Associates are already subject. Instead, the CSF streamlines the risk and compliance process by providing a comprehensive, prescriptive and scalable framework to protect sensitive healthcare information.



In addition, HITRUST operates in conjunction with healthcare, business, technology and security leaders to identify solutions to challenges related to streamlining the effective implementation and assessment of security controls that are applicable to all organizations in the healthcare industry.

The CSF is organized in nineteen (19) domains, which contain over 45 control objectives and over 149 control specifications based on ISO/IEC 27001:2005 and 27002:2005. Each control specification consists of as many as three implementation levels applied to healthcare organizations per specific organizational, system and regulatory factors. The CSF is designed to encompass certain industry segments to allow for additional security requirements as needed for these segments like PCI Data and Health Information Exchanges. The CSF is flexible by nature to help organizations when situations implementing specific controls may not be reasonable and appropriate. HITRUST defines a formal process by which organizations may propose and, if approved, implement alternate controls to mitigate risk associated with a CSF requirement.

The CSF Control Categories Include:

1. Information Protection Program
2. Endpoint Protection
3. Portable Media Security
4. Mobile Device Security
5. Wireless Security
6. Configuration Management
7. Vulnerability Management
8. Network Protection
9. Transmission Protection
10. Password Management
11. Access Control
12. Audit Logging & Monitoring
13. Education, Training and Awareness
14. Third Party Assurance
15. Incident Management
16. Business Continuity & Disaster Recovery
17. Risk Management
18. Physical & Environmental Security
19. Data Protection & Privacy

NIST

The National Institute of Standards and Technology (NIST) is a measurement standards laboratory, and a non-regulatory company of the United States Department of Commerce. NIST promotes innovation and standards from leading practices in various standards bodies that have proved to be successful when implemented, focuses on security as the leading factor, and drives regulatory compliance for organizations to adopt as the standard. NIST targets organizations that own or operate critical infrastructure, and are required by state and federal laws to protect personally identifiable information (PII) and protected health information (PHI). The primary NIST publications that help outline this handbook include:

- NIST Special Publication 800-series reports
- Notably NIST Special Publication 800-53, Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations
- NIST FIPS-200, Federal Information Processing Standards 200
- NIST Cybersecurity Framework document

Other

Security standards are also compiled for infrastructure, applications, and payment card industry best practices from:

- Open Web Application Security Project (OWASP)
- Payment Card Industry Data Security Standard (PCI DSS)
- Information Technology Infrastructure Library (ITIL)
- International Organization for Standardization (ISO) and the International Electro Technical Commission (IEC)

Compliance Program

MTM has in place a compliance program that meets the requirements of the Office of the Inspector General (OIG). Corporate Policy 435 explains our overall Compliance and Ethics Program and addresses the following fundamental elements:

- Implementing written policies, procedures, and standards of conduct
- Designating a Compliance Officer and compliance committee
- Conducting effective training and education
- Developing effective lines of communication
- Enforcing standards through well publicized disciplinary guidelines
- Conducting internal monitoring and auditing
- Responding promptly to detected offenses and developing corrective action



MTM has in place a comprehensive set of policies and procedures that follow the operational lines of our business. Policies and procedures identify specific areas of risk and vulnerability to MTM, and include, but are not limited to:

- Compliance and Ethics Program Overview
- Compliance Hotline
- Compliance and Ethics Education, Training, and Outreach
- Program Risk Assessment and Reduction
- Fraud, Waste, and Abuse Prevention and Investigation
- HIPAA Training
- General Counsel Oversight Compliance
- HIPAA Member Requests Compliance

MTM's policies and procedures are reviewed by department annually. All employees have access to MTM's policies and procedures. Education and training relative to policies and procedures is distributed company-wide, and placed in a central location on the company's intranet site.

Compliance Training

MTM conducts training for new employees within the first few weeks of employment that is comprised of several components, including new hire orientation (during which the Code of Conduct is distributed), operations training, and training specific to management. MTM has developed additional training targeted to specific risk areas such as HIPAA; Fraud, Waste, and Abuse; the Code of Conduct; and the Compliance Hot Line. Annually, MTM's staff receives general and specific compliance training as a condition of ongoing employment.

Compliance Hotline

MTM provides a toll-free phone number for anonymous or confidential reporting of concerns. The Compliance Hotline is available to employees, members, or other parties to report violations of MTM's compliance policies or security violations related to company policy and procedures, and state and federal laws. This is documented in Corporate Policy 436, Compliance Hotline. An independent third party manages the hotline. MTM's HIPAA Privacy Officer works with MTM's legal counsel to obtain guidance for any issue reported that contains legal and/or management reported issues.

Policies & Procedures

Policies and procedures are documents that establish standard practices for MTM employees. Policies contain overarching and universal guidance, while Procedures are more specific and contain client and department-specific processes. It is important for every MTM staff member to be familiar with MTM policy and their department's procedures, and to carry them out in their job functions.

MTM Policies and Procedures are located on the Policy and Procedure SharePoint, where all MTM employees can easily review and search through the documents by department. From company workstations, these documents can be located at <https://intranet.mtm-inc.net/PoliciesProcedures/Pages/default.aspx>.

Security Awareness Training

Training is required by all employees during the initial new hire orientation and includes security awareness of core principles related to information security best practices. This includes:

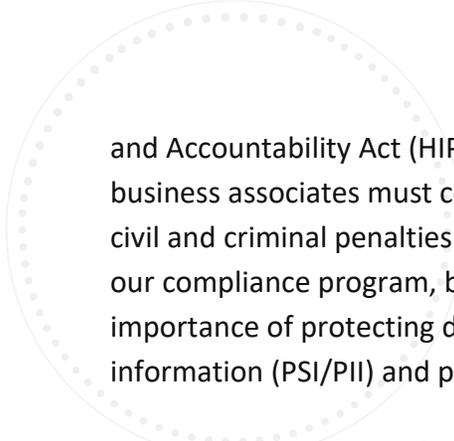
- Enterprise security best practices on protecting client and company information;
- Security card access operations (employee badge use) best practices and access rules;
- Internet security best practices that require only the use of company provided workstations, email and website security, and basic use of passwords;
- Self-service portal for password resets.

MTM requires all new hires and other authorized Users of MTM systems (contractors, etc.) to complete *IT Global Security Basics* course via Knowledge College, as an annual requirement of employment. The Enterprise Security department conducts security awareness training throughout the year utilizing company email, intranet website (Core), and periodic live and remote (WebEx) training sessions.

Accreditations

URAC

MTM has earned Utilization Review Accreditation Commission (URAC) accreditation for promoting healthcare quality. This accreditation outlines a framework showing best practices that describe operational policies and procedures necessary for an effective compliance program. URAC includes standards that address the American Reinvestment and Recovery Act (ARRA) breach processing and notification requirements. The URAC Health Insurance Portability



and Accountability Act (HIPAA) security standards align with the ARRA provisions, where business associates must comply with the full complement of security standards and address civil and criminal penalties outlined in ARRA. MTM has not only achieved this accreditation for our compliance program, but to garner our clients' trust in our understanding of the importance of protecting data files, which include both personally sensitive/identifiable information (PSI/PII) and protected health information (PHI).

In our most recent URAC version 3.0 accreditation for the period of April 1, 2016 to April 1, 2019, MTM received a rating of 100% against mandated HIPAA compliance controls. This included organizational policy and procedure maintenance, review and approval, regulatory compliance, client business associate agreements, client satisfaction, information management, business continuity, information confidentiality and security, confidentiality of individually identifiable health information, quality management, staff qualifications and training, financials, consumer complaint process, consumer rights and responsibilities, and health literacy.

SSAE 16 Type II SOC1

The SOC1 certification includes a thorough review of internal controls necessary to operate our financial reporting, transaction processing, and information technology around business transportation and accounting operations. The annual service organization controls audit establishes oversight, structure, reporting lines, appropriate authorities, and responsibilities to ensure individuals are accountable for their internal control responsibilities in the pursuit of MTM and client objectives. All SOC1 audit is performed internally by MTM's Finance Department.

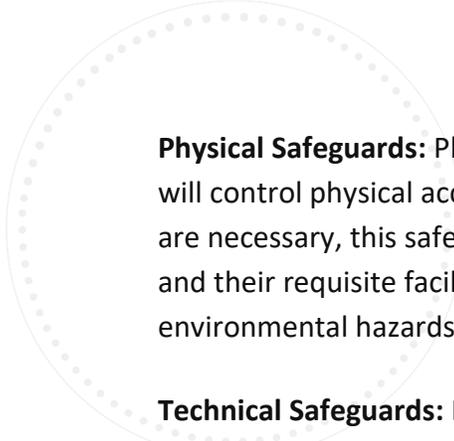
HITRUST CSF

MTM received a validated HITRUST Report January 2018. MTM is HITRUST certified through January 2020. HITRUST interim audits are performed during non-certifying years.

HIPAA Security Rule

The HIPAA Security Rule is comprised of three types of safeguards, all of which are designed to protect PHI data. Each safeguard is briefly explained below:

Administrative Safeguards: Encompassing over half of the entire HIPAA Security Rule, Administrative Safeguards are generally requirements related to “soft” or process oriented controls, such as policies, risk analysis, termination procedures, and training. In short, the administrative safeguards define the policies and standard operating procedures (SOPs) for how an organization will comply with the Rule.



Physical Safeguards: Physical Safeguards identify the requirements for how an organization will control physical access to locations where PHI exists. Though policies and procedures are necessary, this safeguard focuses on the physical controls that protect the PHI systems and their requisite facilities, equipment, and other infrastructures from natural and environmental hazards, as well as unauthorized intrusion.

Technical Safeguards: Building on the Administrative and Physical Safeguards, Technical Safeguards provide systematic controls over the protection of PHI data. When properly implemented, these preventative-type controls are aimed at controlling access to PHI data using unique user accounts, automatic account logout, and user authentication. Additionally, the technical safeguards are responsible for the encryption of data “at rest” and “in transit”.

The HITRUST CSF fully integrates the requirements of the HIPAA Security Rule with the standards of ISO, NIST and many other federal, state and business requirements previously listed. By selecting the characteristics of the organization(s) and system(s) to be evaluated, the CSF’s control requirements scale based on risk.

It is worth noting there is no official “compliance” designation or seal associated with the HIPAA Security Rule. Organizations can only attest to their compliance by providing a supporting risk assessment and evidence of their security controls. HITRUST recognizes and addresses this gap through its Certification program.

Risk Identification and Management

Security team operations include identifying risks associated with infrastructure products, company applications, operational controls, physical controls, as well as staff to ensure effective controls and risks are addressed to meet client, state, and federal regulations.

Risks are quantified by ratings of Low, Medium, High and Critical during all avenues of operational assessments within the security department. This includes identifying and ensuring management is informed of all risks, and accepts or takes further directive actions for managing said risks.

Security assessments are aligned with a rating system provided by the National Vulnerability Database (NVD) system and in support of the Common Vulnerability Scoring System (CVSS). CVSS is an open framework for communicating the characteristics and impacts of IT discovered

vulnerabilities. The model ensures repeatable accurate measurement while enabling users to see the underlying vulnerability characteristics used to generate the scores. CVSS provides vulnerability impact scores that help identify a severity ranking of Low, Medium, High, and Critical.

CVSS V3 Score Range	Severity Level
0.1 – 3.9	LOW
4.0 – 6.9	MEDIUM
7.0 – 8.9	HIGH
9.0 – 10.0	CRITICAL

Below are examples of vulnerabilities and a severity level. This is to be used only as a guide. Actual ratings are based on a combination of the vulnerability and the system or application.

Critical Risk

Vulnerabilities scoring in the critical range commonly have most of the following characteristics:

- Exploitation of the vulnerability likely results in root-level compromise of servers or infrastructure devices.
- Exploitation is usually straightforward, in the sense that the attacker does not need any special authentication credentials or knowledge about individual victims, and does not need to persuade a target user, for example via social engineering, into performing any special functions.

For critical vulnerabilities, it is imperative to patch accordingly as outlined per Policy 338 Patch Management, unless other mitigating measures are in place or approved by the Security Officer for accepting the risk. For example, a mitigating factor may be the installation is not accessible from the internet. Reference the organizational IT policy for requirements that address patching Critical risks.

High Risk

Vulnerabilities scoring in the high range commonly have some of the following characteristics:

- The vulnerability is difficult to exploit.
- Exploitation could result in elevated privileges.
- Exploitation could result in a significant data loss or downtime.

Medium Risk

Vulnerabilities scoring in the medium range commonly have some of the following characteristics:

- Vulnerabilities that require the attacker to manipulate individual victims via social engineering tactics.
- Denial of service vulnerabilities that are difficult to set up.
- Exploits that require an attacker to reside on the same local network as the victim.
- Vulnerabilities where exploitation provides only very limited access.
- Vulnerabilities that require user privileges for successful exploitation.

Low Risk

Vulnerabilities in the low range typically have very little impact on an organization's business. Exploitation of such vulnerabilities usually require local or physical system access.

Reference Documents

The following documents are available for more information.

- Information Security Program Handbook (available on the Leadership Resource SharePoint)
- Information Security Investigation Evidence Security Reports (requires HR and or legal approval and deemed confidential for internal use only)
- Information Security Assessment Reports – Annual and quarterly available (requires Security Officer's approval and deemed confidential for internal use only)
- Client Attestation Letters (Security and or Account Services or QM approval)
- Client Audit Reports (Security and or Account Services or QM approval)



Injury and Illness Prevention Program July 01, 2023



Transit

MTM TRANSIT
220 Moffat Blvd
Manteca, CA 95336
www.mtmtransit.com

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Section 1. Introduction

MTM Transit's Management recognizes that the health and safety of its employees is of paramount importance to the successful operation of its business. Employees have a right to expect a safe and healthy working environment and safe job methods and practices. For that reason, MTM holds safety and health as its highest value.

MTM Managers and Supervisors are responsible for maintaining healthy and safe working conditions and for the implementation of MTM's Injury and Illness Prevention Program (IIPP) in their respective departments and at their respective locations.

Employees are expected to follow safe work practices and procedures and adhere to all safety rules. All employees must take an active role in protecting themselves and fellow workers. Employees are expected to detect and report unsafe conditions, practices, and behaviors in the workplace.

Every effort is made to provide adequate training to MTM personnel. However, if there is ever any doubt about how to do a job or task safely, it is the responsibility of the employee to ask a knowledgeable, qualified person for assistance before resuming work.

MTM personnel are expected to assist management in accident prevention activities. Any potentially unsafe conditions and all on-the-job injuries must be reported promptly to the injured employee's manager or supervisor.

Approvals

Name	Signature / Printed Name	Date
Transit Manager	Juan Portillo	11/01/2023
General Manager:	Mark Frailey	11/01/2023
Operations Manager:	Francis Kemp	11/01/2023
Safety Manager:	Francis Kemp	11/01/2023
Maintenance Manager	Adam Perriera	11/01/2023

Note: The references herein to "MTM" or "MTM Transit" describe MTM Transit, to include all its subsidiaries, joint ventures, partnerships, and affiliates.

1.1. Objectives

The objective of the safety policy/program and administrative procedure is to prevent accidents, reduce personal injury and occupational illness, and comply with all safety and health standards. Through employee training, education, and participation in this program, MTM hopes to develop and maintain employee awareness, health, and safety.

- To provide employees with a safe work environment through the identification and elimination of hazards.
- To ensure that supervisors accept their basic responsibilities for the safety of employees and guarantee the consistent enforcement of safety requirements by all levels of management at all locations.
- To make a concerted effort to instill safety awareness in every employee.
- To provide employees with the knowledge of safe and effective methods of performing their job through ongoing instruction and training.
- To adhere to all local, state, and federal safety codes, recognizing that these are considered only minimal safety requirements in many instances.
- To make certain each employee understands and accepts that individual safety responsibility is a condition of employment.

1.2. Safety Policy

Local, state, and federal laws, as well as company policy, make the health and safety of MTM personnel the first consideration of our business. To be successful in this endeavor, all employees on every level shall adopt positive attitudes towards injury and illness prevention. We must also cooperate in all safety and health matters, not only between management and employees, but also between each employee and his or her respective coworker. Only through such efforts can our safety program be successful. Our goal is zero accidents.

1.3. Work Conditions

It is the responsibility of all personnel to be watchful of conditions in all work areas that can produce or lead to injuries. MTM employees will never be required to do a job that is known to be unsafe, or harmful to one's health or safety. Cooperation in detecting potential hazards, reporting dangerous conditions, and limiting workplace risks is the duty of every employee. Employees must inform their supervisor immediately of any situation that is beyond their ability or authority to correct. MTM employees **will not** be disciplined or suffer any retaliation for reporting, in good faith, a safety violation or potential hazard.

Section 2. Roles and Responsibilities

2.1. General Manager

Under the authority of MTM's Board of Directors and the Chief Operating Officer, the General Manager is responsible for overall management and administration of the IIPP. All levels of management are expected to fully support the safety director and ensure that all safety practices and procedures are uniformly and fairly enforced.

2.2. Safety Manager

The Safety Manager has the authority and responsibility to develop and implement the IIPP at their division.

2.1. Supervisors or other Lead Personnel

Each supervisor is responsible for implementing the IIPP in their work area, and for answering employee questions about the IIPP. Supervisors must keep a current copy of the IIPP available to employees upon request.

In addition, supervisors have full responsibility in providing employees with an understanding of the safe and effective methods of performing their job, through continuing instruction and training as well as ensuring they adhere to all local, state, and federal safety codes. A supervisor's failure to provide employees under their direction with the proper training results in disciplinary action and may be grounds for dismissal.

Section 3. Participation and Compliance

3.1. Employee Agreement to Participate

A safe and healthy workplace is among MTM's highest priorities. All personnel are expected to always use safe work practices. While MTM cannot anticipate every workplace hazard, the following general principles should serve as a guide for MTM personnel:

- Always be safety conscious.
- Know the safety procedures and responsibilities related to your job.
- Discuss safety situations with your supervisor and/or the safety manager.
- Attend all required safety training and safety meetings.
- Read all posters and warnings.
- Listen to instructions carefully.
- Use safe workplace practices.
- Participate in accident investigations as requested.
- Accept responsibility for the safety of yourself and others.
- Maintain all required documentation.

As a condition of employment with MTM, employees must read and understand this IIPP and know where to find an updated copy. It is the employee's responsibility to ask a supervisor or the safety manager for assistance and further explanation should any provisions of the IIPP be unclear.

Employees who follow safe and healthy work practices will have this fact recognized and documented on their performance reviews. Employees who are unaware of correct safety and health procedures are trained or retrained as described in Section 4.0.

Willful violation of safe work practices may result in disciplinary action in accordance with company policies.

3.2. Compliance

Managers and supervisors are obligated to ensure all safety and health policies are clearly communicated and understood by MTM personnel. To ensure compliance, MTM shall:

- Conduct safety orientations for new employees;
- Recognize employees that perform above and beyond MTM safety policies;
- Promptly distribute or post updates and notices, via written or electronic means (e.g. bulletin boards, newsletter, etc.);
- Conduct periodic safety meetings;
- Provide formal and informal training;
- Encourage employee reporting of unsafe conditions; and
- Discipline personnel for failure to comply with safety policies.

3.3. Consequence of Non-Participation

Personnel who purposefully or willfully fail to comply with the established policies and procedures outlined in this IIPP, are subject to disciplinary action, up to and including termination.

Section 4. Safety Training and Communication

4.1. Overview

To maintain a safe and healthy work environment as well as complying with local, state, and federal safety codes, MTM requires all personnel receive general and job-specific safety training and emergency information. Directors and managers are responsible for ensuring supervisors are fully trained and knowledgeable in safety and health hazards employees under their immediate direction and control may be exposed.

4.2. Training

Supervisors are responsible for ensuring all personnel under their direction receive training on general workplace safety as well as safety issues specific to their job. This includes safety orientation for new employees and any additional training needed for job-specific hazards. Employees must complete this training before they can work unsupervised.

Training and educational information is provided when:

- There have been significant revisions to the IIPP;
- Employees are initially hired;
- Employees are given a new job assignment where training has not been received;
- New substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- An employee is found in violation of MTM policies and procedures;
- A new hazard has been discovered; or
- As needed, for any reason deemed necessary.

Training topics may include, but are not limited to, the following subjects:

- Contents of the IIPP
- Names of MTM safety and health personnel and site safety responsibilities
- Safe work practices for job-specific assignments
- Fire prevention and protection measures and location of portable fire extinguishers, sprinkler systems, and smoke and/or fire alarms
- Chemical and physical hazard identification in specific work areas
- Emergency procedures and locations of first aid supplies and other emergency equipment
- Disaster preparedness and response, including building evacuation procedures.
- Back care, body mechanics, and proper lifting techniques
- Hazard communication, including training on safety data sheets (SDS), chemicals hazards, and container labeling.
- Proper housekeeping.
- Chemical spill reporting procedures.

The safety manager, supervisor, and/or their designee conducts monthly safety meetings on topics of interest relevant to their employees' work activities. Employees are given an opportunity to ask questions and to raise any safety concerns. These meetings also provide an opportunity to review the specific causes and corrective actions for any occupational injury, illness, or near misses that have occurred in the prior months.

4.3. Communication

MTM values open communication between management and personnel on all matters pertaining to safety and health. The system of communication consists of:

- Workplace safety and health training;
- Posted, or distributed safety-related informational material;
- A system for employees to anonymously inform management about workplace hazards;
- When necessary, provide translation to effectively communicate safety and health concerns; and
- Hazard identification and abatement.

4.4. Workplace Inspections

Supervisors review work operations daily for compliance with safe work practices and standard operating procedures. At least monthly, each supervisor or their designee conducts more in-depth inspections to identify workplace hazards and unsafe conditions or work practices.

Additional inspections take place when:

- The IIPP is initially established;
- Occupational injury or illness has occurred;
- Workplace conditions warrant an inspection; or
- Whenever a supervisor is made aware of a new or previously unrecognized hazard.

A record of the inspection and discrepancies found are maintained by the safety manager and a follow-up action plan is established to ensure that corrective measures are taken. The safety manager also conducts periodic walkthroughs of the division.

4.5. Abatement of Unsafe Conditions

Whenever an unsafe or unhealthy condition, practice, or procedure is observed, discovered, or reported, the safety manager or their designee takes appropriate corrective measures in a timely manner based upon the severity of the hazard. Inspection findings are prepared in writing and maintained by the safety manager.

Employees are informed of the hazard and interim protective measures taken until the hazard is corrected. If the hazard cannot be immediately abated, all personnel are removed from the affected area. Access to the area is controlled until the safety of personnel can be assured.

Section 5. Incident Investigation

5.1. Incident Investigation

The first response by a supervisor to an incident is to begin an incident investigation. They must then submit a preliminary report to the safety manager within 24 hours. Priority is placed on learning as much as possible about what happened and identifying the means to prevent similar occurrences in the future.

The incident investigation detail includes:

- The reported injury/illness
- Close Calls: These are safety related incidents which could have resulted in an injury/illness (e.g. chemical spills, fires, equipment left running, water leaks around electrical equipment, slip/trip/fall hazards not marked)
- Underlying causes of the incident

5.2. Reporting an Injury Incident

Every work-related injury requiring more than a Band-Aid, no matter how minor, must be reported to the supervisor, general manager, or maintenance manager.

- Employees are responsible for reporting all illnesses, injuries, exposures incidents, property damage, near misses, and hazardous situations immediately or before the end of their shift;
- Participating in the incident investigation; and
- Completing the appropriate forms and contact information.

5.3. Procedure

The following procedure for documenting the illness and injury investigation is as follows:

- Use an unbiased approach to finding the cause of the injury.
- Develop an analysis of what happened, how it happened, and how it could have been prevented.
- Visit the scene of the incident as soon as safe to do so to obtain important details from witnesses while those detail are fresh in their minds.
- If possible, interview the injured worker at the scene.
- All interviews should be conducted as privately as possible. Interview witnesses one at a time. Talk with anyone who has knowledge of the injury/illness even if they did not actually witness it.
- Consider taking statements in cases where facts are unclear or there is disagreement about the facts.
- Document details graphically. Use sketches, diagrams and photos as needed and take measurements when appropriate.
- If a third party or defective product contributed to the injury, save any evidence. It could be critical to the recovery of claims costs.

Serious injuries, illnesses, or death of an employee must be reported to as soon as possible, within eight (8) hours to risk management and the area vice president. Serious injury or illness means an injury or illness which requires inpatient hospitalization for more than 24 hours for other than observation, a loss of any member of the body, or any serious degree of permanent disfigurement.

Section 6. Record Keeping

6.1. Scheduled Inspections

The safety manager maintains records of formal inspections for at least three years. These records include at minimum the work location, date of inspection, inspector's name, and description of any hazards or unsafe condition identified and corrective actions implemented.

6.2. Safety and Health Training

Documentation of safety meetings and training is the responsibility of the safety manager and/or their designee. Training must be documented using written sign-up sheets that show at minimum the date of training, the names of personnel in attendance, topics discussed, and the instructor's signature. Copies of any written training materials will be retained to document specific training content. This documentation is retained for at least three years.

6.3. Injury or Illness Report

The purpose of the safety program is to limit the incidence of error and carelessness through awareness. Record keeping and review of accident/injury records is one way to maintain awareness and avoid a recurrence of a similar event.

Basic records that shall be maintained:

- Employer's Report of Occupational Injury or Illness
- Annual Log and Summary Report of Occupational Injuries and Illness

The responsibility of completing these records shall be that of the safety manager or his/her designee. All reports must be maintained for no less than five years.

Section 7. Acknowledgement Forms

**RECEIPT AND ACKNOWLEDGEMENT OF POLICY AND TRAINING
INJURY AND ILLNESS PREVENTION PROGRAM**

I _____ confirm that I have received a copy of the document titled:
“Injury and Illness Prevention Program” and understand its provisions.

I further confirm that I have received training pursuant to this Program.

Signed: _____

Title: _____

Date: _____

City of Manteca Injury and Illness Prevention Program (IIPP)



Injury and Illness Prevention Program Review and Approval

This City of Manteca IIPP has been reviewed and approved by the Administrative Services Director. Such authorization demonstrates the commitment by management to accept responsibility and implement the IIPP.

Administrative Services Director Signature

Effective Date: _____

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Accident/Exposure Investigation Form Appendix B

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Initial Safety Training Appendix D

Safety Meeting/Training Form.....Appendix E

Section 1: Introduction

1.1 Policy

The City of Manteca (City) Injury and Illness Prevention Program (IIPP) has been developed as a Citywide guide for our work place safety promotion and injury prevention efforts. This document represents our official policy and procedural guidelines for employee safety and meets California Occupational Health and Safety Administration (Cal/OSHA) requirement for the development of such a plan. This program will also meet the record keeping requirements and injury reporting protocols of the Municipal Pooling Authority (MPA). The City is a member of the MPA, which is a joint powers authority where most of the City's insurance coverages are obtained.

Individual Departments shall add supplemental procedures in addition to this document as necessary to implement their injury prevention programs. This IIPP will be reviewed periodically and revised as needed at the direction of the Administrative Services Director.

All employees are encouraged to review this document and to make every effort to carry out their duties with an emphasis on injury prevention. Employees should report any conditions, which they feel, are a hazard to themselves, other employees, or the public. Injury and illness prevention is a concern of the City of Manteca and we expect that all City employees will make every effort to maintain the safety of the work environment.

Safety and health in our business must be part of every operation at the City of Manteca. Without question, safety and health is every City of Manteca employee's responsibility at all levels. To be successful, such a program must embody proper attitudes toward injury and illness prevention on the part of management, supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and co-workers. Only through such a cooperative effort can a safety and health program in the best interest of all be developed, implemented, improved and preserved'.

This City of Manteca Injury and Illness Prevention Program has been reviewed and approved by the Administrative Services Director. Such authorization demonstrates the commitment by management to accept responsibility and implement the Injury and Illness Prevention Program.

In accordance with Title 8, California Code of Regulations, Section 3203, Injury and Illness Prevention Program, (T8CCR§3203), City of Manteca establishes this IIPP as part of its employee safety and health program.



1.2 Scope

The IIPP is applicable to employees working at City of Manteca facilities and other sites while on City business. It is the policy of City that employees follow and adhere to the requirements set forth in this IIPP.

1.3 Program Description

The Injury and Illness Prevention Program for the City of Manteca includes the following elements: a description of program responsibilities; methods of compliance; safety communications; hazard assessment process; safety training programs; scheduled periodic inspections; accident investigation process and the establishment of a citywide Administrative Safety Committee.

1.4 Reference Documents

This IIPP is supported by other City of Manteca health and safety programs and related documents, as follows:

- Accident Investigation
- Bloodborne Pathogens
- Code of Safe Work Practices
- Confined Spaces
- Electrical Worker Safety
- Ergonomics
- Emergency Action Plan/Fire Prevention Plan
- Hazard Communication
- Hearing Conservation
- Indoor Air Quality
- Powered/ Small Tools
- Respiratory Protection
- Hazardous Energy Control Program (Lockout/ Tagout)
- Personal Protective Equipment
- Mobile Equipment



-
- Ladder Safety Program
 - Fall Protection
 - Excavation & Trenching Safety
 - Traffic Safety
 - Heat Stress

1.5 Program Distribution

A copy of this IIPP will be made available to each City employee upon initial IIPP training.

1.6 Program Review

The Administrative Services Director is responsible for conducting a periodic review of the IIPP to verify that the program reflects current city policies and procedures, complements management responsibilities, and incorporates facility/operations/IIPP changes that have occurred presenting previously unrecognized or new hazards.

1.7 Other Agencies

In addition to Cal/OSHA, several other government agencies have requirements relative to health and safety. These include, but are not limited to:

- Department of Transportation (DOT) – Truck drivers
- California Department of Transportation (Caltrans) – Lane and road closures

Section 2: Program Responsibilities

2.1 City Manager

The City Manager has ultimate authority and responsibility for implementing the IIPP. The City Manager's office is responsible for the overall leadership and administration of the IIPP. The City Manager shall determine the Safety Policy and Administrative Procedures related to safety and will hold Department Managers and Employees accountable for their safety performance and adherence to the codes of safe practices through an annual safety program evaluation and individual performance evaluations.



2.2 Administrative Services Director

The Administrative Services Director has been delegated by the City Manager with the authority to implement the IIPP in conjunction with Department Managers. In addition, the Administrative Services Director's specific Program responsibilities are to:

- Convene and coordinate the activities of the Administrative Safety Committee.
- Manage the pre-employment screening and hiring program.
- Assure that safety orientations, including information regarding the IIPP is provided to new regular part-time and full-time employees.
- Assist in developing employee safety training.
- Maintain Cal/OSHA record keeping requirements and injury reporting protocols of the CCCMRMIA.
- Provide loss runs and analysis reports to the Safety Committee periodically as received from CCCMRMIA.
- Ensure divisions/departments are conducting required safety meetings and assist when needed.
- Coordinate and promote the wellness and health maintenance programs.
- Investigate all serious or fatal employee accidents.
- Develop a comprehensive annual department evaluation of the implementation of the IIPP.

2.4 Administrative Safety Committee

This committee shall be under the direction of the Administrative Services Director and will assist in the overall leadership and administration of the Injury and Illness Prevention Plan. Additional responsibilities shall include the following:

- Assist Departments with their safety activities, such as safety promotions and safety meetings.
- Review and discuss safety concerns, suggestions or needs of employees and supervisors and respond to the appropriate members of the management team.
- Review the results of workplace safety inspections to identify and analyze workplace safety concerns.
- Assist various departments in conducting their Safety Inspections.



- Periodically provide meeting minutes and reports as needed to the City Manager and Department Managers on the status of the program, accident trends or unresolved safety issues.
- Develop an overall citywide safety-training plan of action.
- Oversee scheduled safety inspections.
- Create and disseminate Safety Topics of the Month for employee communications and training.
- Review loss runs and accident investigation reports for trends and accident prevention opportunities.

2.5 Department Mangers

Department Mangers are responsible for the leadership and administration of the safety program in their department. They must ensure that all safety and health policies and procedures are clearly communicated and understood by all employees. In addition, they shall:

- Designate an appropriate representative to attend all Administrative Safety Committee meetings.
- Support the Administrative Safety Committee's activities, goals and objectives.
- Keep informed of laws, standards and attend management training related to injury prevention.
- Know, communicate and enforce the codes of safe practices fairly and uniformly.
- Provide and enforce the use of personal protective equipment.
- Ensure that task observations of employees are done periodically to assure compliance with safety procedures.
- Ensure adequate investigations are conducted on all accidents/incidents.
- Review accident/incident trends, analysis and reports.
- Direct that equipment, materials and work areas be maintained in safe condition.
- Actively participate in accident investigations and implement appropriate corrective measures.
- Arrange for safety self inspections periodically.
- Implement and participate in department and citywide safety promotional activities.
- Disseminate safety and risk management information to the appropriate personnel.
- Participate in emergency preparedness & fire prevention drills
- Establish a safety-training plan so that regulatory requirements are met.



2.6 Supervisors

Each City of Manteca Supervisor is responsible for the day-to-day implementation and maintenance of the IIPP within in their assigned work areas. Supervisors' main IIPP responsibility includes working with the Safety Manager to implement the IIPP and promote a healthy and safe work environment. Supervisor's IIPP responsibilities include participating in reviewing and revising safety procedures; conducting and documenting employee training and safety communications; conducting workplace safety inspections; investigating accidents and injuries, and implementing corrective actions. In effectively executing safety responsibilities, supervisors will:

- Keep their Department Manager informed of all safety issues or problems.
- Support the Department's safety activities, goals and objectives.
- Understand and enforce safety regulations and codes of safe practices applicable to operations within their area of responsibilities.
- Conduct safety orientations and training of new hires.
- Instruct employees on hazards that are unique to their job.
- Conduct task observations of all employees periodically to assure compliance with safety procedures.
- Conduct regular safety inspections of work areas.
- Hold safety meetings and disseminate risk management information to employees.
- Conduct accident investigations and implement corrective action.
- Ensure that equipment, materials and work areas are maintained in safe condition.
- Provide personal protective equipment and monitor its use.
- Keep informed of laws, standards and attend management training related to injury prevention.
- Review accident/incident trends, analysis and reports.
- Participate in department and citywide safety promotional activities.

2.7 Employees

Each City of Manteca employee is responsible for following general safety and health policies and procedures and job-specific safety and health policies and procedures; adhering to the Code of Safe Work Practices reporting unsafe acts or conditions to their supervisors; and participating actively in safety communications and IIPP. Employees are expected and encouraged to assist management in accident prevention activities, and shall:

- Attend scheduled safety training.



- Be aware of and comply with safety regulations and codes of safe practices applicable to the work being done.
- Report unsafe conditions and practices immediately.
- Utilize the 24-hr. employee reporting line (ERMA) to report unsafe activities or conditions, if necessary.
- Maintain good housekeeping activities at all times.
- Report all injuries and exposures to the person in charge on the day of occurrence, no later than the end of shift.
- Use the personal protective equipment provided.
- Wear appropriate clothing and footwear for the job tasks.
- Operate equipment with all safety guards in place.
- Coach fellow employees on safe work practices, whenever appropriate.
- Perform only authorized jobs.
- Be aware of accident/incident trends, analysis and reports.

Section 3: IIPP Compliance

The Administrative Services Director, management and supervisory personnel are responsible for ensuring that safety and health policies and procedures are clearly communicated and understood by each City of Manteca employee. The City's system of ensuring that employees comply with the IIPP include:

- Informing all employees of the provisions of the IIPP.
- Evaluating individual safety performance.
- Annual evaluation of each Department's implementation of their safety plan of action.
- Recognizing employees who perform safe and healthful work practices.
- Developing incentive based programs to encourage participation in the safety program.
- Providing training, both initially and remedial to employees whose safety performance is deficient.
- Disciplining employees through standard progressive discipline for failure to comply with safe work practices after being trained and reminded.

Section 4: Safety Communication

The City of Manteca recognizes that open, two-way communications between city management and staff on health and safety issues is essential to an injury free, productive City. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of:



- SafetyLine Newsletter (distributed quarterly)
- New employee orientation to include a discussion of safety and health policies and procedures.
- A review of the IIPP with all employees annually.
- Regularly scheduled safety meetings within all departments.
- Safety communication bulletins and awareness posters.
- Anonymous safety reporting program through the use of a 24 hr. hotline phone reporting system.
- Safety Training programs.
- Administrative Safety Committee meeting minutes posted.
- Material Safety Data Sheets available at each major job location.

The City of Manteca recognizes that positive contributions to the IIPP by an employee serve the city by helping to create a safe and healthful work environment, and often promote good morale and increased productivity.

During their performance review each City of Manteca employee shall be evaluated regarding their health and safety performance with the same level of importance as productivity, technical ability, quality, and dependability.

Employees who successfully demonstrate their ability to work safely will receive recognition in a manner deemed appropriate by their Supervisor and Safety Manager.

A City of Manteca employee of who knowingly and willingly disregards safe work practices and/or fails to abide by prescribed safe work practices and/or policies shall be subject to standard progressive discipline up to and including discharge per City policy. Disciplinary actions must be documented and maintained in the employee's personnel file.

Section 5: Hazard Assessment

Periodic inspections to identify and evaluate workplace hazards shall be performed by Depart Managers, or their designees. These inspections will occur when City of Manteca initially established the IIPP; when new substances, processes, procedures or equipment which may present potential new hazards introduced into the workplace; when occupational injuries and illnesses occur; when newly hired and/or reassigned permanent or temporary workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and whenever workplace conditions warrant an inspection.

Regular safety inspections shall be performed periodically as determined by the Department Manager and the Administrative Safety Committee.



Members of the City Safety Committee, safety & risk control specialists or consultants may do additional inspections. These will be done based upon a specific need or as the result of a serious accident. All reports of inspections will be forwarded to the Department Manager for action.

Section 6: Accident/Exposure Reporting & Investigation

6.1 Accident/Exposure Reporting and Investigation

When an employee is injured on the job, or when they first notice an illness that arose out of or occurred in the course of their job duties, they shall report such instances to their supervisor on the day of occurrence or notice, no later than the end of their shift. Following that report they will receive:

1. An Accident Investigation Report;
2. A DWC Form 1 (Employee's Claim For Workers' Compensation Benefits) and
3. A referral for medical treatment. Employee's who do not report an injury promptly may have their workers' compensation benefits delayed or denied.

Supervisors shall submit all documentation to Administrative Services within 24 hours of notification of injury/illness.

The employee's supervisor then must investigate the accident within 72 hours. The following accident investigation steps are done at the minimum:

1. Interview the injured employee and any witnesses.
2. Visit the accident scene and corroborate or note any inconsistencies in the testimony of the employee or witnesses. Take photos or make a sketch of the scene if necessary.
3. Examine the workplace factors or unsafe conditions associated with the accident/exposure.
4. Determine the cause of the accident/exposure.
5. Develop a plan for corrective action including the date of implementation.

The results of the accident investigation must be documented on the Accident Investigation Report and reviewed by the Department Manager or designee. The original report must then be sent to the Administrative Services Department, with a copy to the Department files.

Accident Reporting Procedures Involving City Vehicles:



The Manteca Police Department shall be called in all accidents involving a City Vehicle in any of the following circumstances:

- The accident occurs on any city street, regardless of the amount of injury or damage.
- On private property, if anyone is injured, or if damage is sustained to another vehicle or private property. (Exception: When the accident occurs on city-owned property other than a public street in a collision with other city-owned equipment or a fixed object, you must notify the supervisor(s), not the Police Department.

If any City employee is injured in an accident involving a City Vehicle, they shall complete an "Accident Investigation Report" in addition to vehicle damage reports.

The Accident Investigation Report form can be found in Appendix C.

Under no circumstances shall the injured employee ever fill out the investigation form.

6.2 Corrective Action

Corrective action(s) must be established based on the root cause of the accident/exposure investigated. More than one corrective action may be established.

Developing and implementing a corrective action requires assignment of a responsible individual to implement action item(s) within completion schedule(s) assigned. The investigation is not considered complete until the corrective action(s) are implemented and the Administrative Services Director signs the investigation form.

Section 7: Hazard Correction

It is the City's intention to abate, with all reasonable speed, any hazard, which gives rise to a risk of harm in the workplace. In correcting an imminent unsafe condition, appropriate precautions will be taken to protect the safety of employees. The following plan will be implemented for identified hazards in the work place:

- Remove or take out of service the hazard where possible.
- Removal or relocation of employees from the area of exposure.



-
- Provide guarding mechanisms appropriate to the hazard and the specific process or piece of equipment being used.
 - Provide appropriate personal protective equipment.
 - Adjust work schedules, break periods or job rotation where feasible.
 - Provide training in recognizing and taking self-corrective action regarding the hazard.

All such action taken and the dates of completion shall be documented by the Department Manager or designee and for report to the Administrative Safety Committee.

Each employee is responsible to immediately report unsafe condition or acts to their supervisor as well as co-workers who may be affected. City of Manteca employees are encouraged to correct workplace hazards providing they notified their Supervisor and that the corrective action to be taken is appropriate and can be accomplished safely by the employee.

Section 8: Training and Instruction

8.1 General and Job-specific Safety Training

Under no circumstances shall City of Manteca employees be allowed to work without first receiving appropriate training upon hire (refer to Appendix F, Initial Safety Training), or new job assignment/responsibilities or operating new equipment or using new materials. Training provided at safety meetings or training sessions must be documented on the Safety Meeting/Training form (Appendix G) and the completed forms maintained by the Department Manager.

Each City of Manteca employee, including Managers and Supervisors, shall have training and instruction on general and job-specific safety and health practices. The Department Manager or designee shall provide job-specific training and instruction, as follows:

- To each employee when the IIPP is first established or revised, and to workers given new job assignments for which training has not previously provided.
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard.
- Whenever the Department Managers, Supervisors and workers are made aware of a new or previously unrecognized hazard.



-
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed.
 - To each employee with respect to hazards specific to his or her job assignment.

Safety training subjects include, but are not limited to the following:

- An explanation of the IIP Program, Codes of Safe Practices, emergency action plan, fire prevention plan, the Employee Assistance Plan for counseling services and ERMA hotline reporting.
- How to report unsafe conditions or work practices
- The safe use of tools and equipment.
- The use of personal protective equipment and the appropriate clothing for work, including footwear, gloves and eye / face protection.
- The provision of medical services and first aid.

In addition, employees will be provided job specific safety training in the following subjects depending on what Job Safety Classification they are in:

- Aquatics Management
- Bloodborne Pathogens and Exposure Control Plan
- Body Mechanics and Safe Lifting
- Confined Space Entry and Rescue Procedures
- Defensive Driving
- Electrical Safety
- Ergonomics and Repetitive Motion Injury Prevention
- Hazard Communication Program
- Hearing Conservation Program
- Industrial Truck Safety
- Materials Handling
- Mobile Equipment Safety
- Police pursuit and arrest operations
- Use of Force Training
- Respirator Protection Program
- Special Operations (Tree Falling)
- Traffic Control Safety
- Trenching Safety
- Service Weapon Safety
- Welding and Cutting Safety
- Workplace Security IIP plan



8.2 IIPP Training

IIPP training shall be provided by the Department Manager or his designee to new hires prior to commencing work assignments. The Safety Manager shall provide once a year as refresher IIPP training to existing employees. IIPP training topics shall include the following, at minimum:

- City of Manteca 's IIPP, Emergency Action Plan, Fire Prevention Plan, and measures for reporting unsafe conditions, work practices, injuries and when additional instruction is needed.
- Proper use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- Information about chemical hazards to which employees could be exposed and other relevant hazard communication program information.
- Availability of toilet, hand-washing and drinking water facilities.
- Provisions for medical services and first aid including emergency procedures.

See Appendix E for a complete list of initial safety training topics.



Section 9: Recordkeeping and Documentation

Safety program documents and records of hazard assessment inspections/corrective actions, safety and health training shall be maintained and retained, as follows:

Document	Retention Time
IIPP (updated annually)	Indefinitely
OSHA 300 Log Form	5 years
Safety Inspection Forms	1 year
Accident/Exposure Investigation Form	1 year, unless OSHA Log 300 injury/injury entry then 5 years.
Employee Training Forms	
Personnel Records	Duration of Employment
Training Sign-up Sheets	1 year
Records Relating to Employee Communication and Enforcement	
Safety Meeting Sign-up Sheets	3 years
Safety Suggestion/ Response	3 years
Disciplinary Actions	3 years
Safety Records, not subject to the access standard	3 years
Medical and Employee Exposure Records	Duration of Employment Plus 30 years

Section 10: Program Evaluation

The Administrative Services Director will conduct a periodic evaluation of the citywide Injury and Illness Prevention Program. The evaluation utilizes a variety of information sources, including reports from the workers' compensation and general liability administrator for statistical trending of claims history. Minutes of safety meetings are



reviewed for action taken. All accident investigation reports are evaluated for completeness, corrective measures identified and action taken. Department safety activities (safety inspections, employee safety training etc.) are measured against the Departments commitment to implementing the IIPP. This annual review examines the objectives, scope, performance and effectiveness of the Injury and Illness Prevention Program as it is applied in each Department.

The annual evaluation will be presented to the Administrative Safety Committee for review and comment, prior to being formally presented to the City Manager. Department Managers are responsible for implementing any recommendations in the report, and the findings are used in the management performance review process.

Department Managers shall utilize the annual evaluation to develop, with other input, a Department annual safety plan. The plan should address and prioritize the safety action steps for the year: dates of new hire quarterly orientations; specific safety training; safety meeting schedules; dates of inspections; personal protective equipment needed and safety communication materials to be used during the following year.



APPENDIX A

CODE OF SAFE WORK PRACTICES

City of Manteca



Code of Safe Work Practices

City of Manteca

1. Each City of Manteca employee shall follow these safe practice rules, render every possible aid to safe operations, and report unsafe conditions or practices to their Supervisor.
2. Supervisors and Managers shall insist on employees observing and obeying every rule, regulation, and order as is necessary to conduct work safely, and shall take such actions as is necessary to obtain observance.
3. Employees and/or contractors known to be under the influence of drugs or intoxicating substances that impair a person's ability to safely perform the assigned duties shall not be allowed on the job while in that condition, and subject to disciplinary action, up to and including termination of employment or contract.
4. No City of Manteca employee shall knowingly be permitted or required to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the employee or others to injury or illness.
5. City of Manteca employees shall be given frequent accident prevention instructions at brief Safety Meetings held monthly, or more frequently as job hazard analyses may dictate.
6. Horseplay, scuffling, arguing, fighting and other acts that tend to have an adverse influence on the safety or well being of the employees and others is prohibited.
7. Work shall be well planned and supervised to prevent injuries and illnesses in the handling of materials and working with equipment and tools.
8. Employees shall not enter manholes, underground vaults, chambers, tanks, or other confined spaces unless the employee is qualified by training, adequately equipped, authorized and the confined space deemed safe to enter and permitted.
9. City of Manteca employees are not permitted to remove machine guards and other protective devices. Such protective devices shall be properly placed and adjusted before operating the machine or equipment. Employees shall remove deficient equipment/machinery from service and promptly report deficiencies to their Supervisor.
10. City of Manteca employees must wear seatbelts while operating motor vehicles and avoid distractions that prevent the safe operation of the vehicle being operated.
11. Employees shall not handle or tamper with electrical equipment, machinery, or air or water lines in a manner not within the scope of their job duties, unless they have received instructions from their Supervisor to perform such tasks.

12. City of Manteca employees shall report work related injuries and illnesses promptly to the Supervisor so that arrangements can be made for first aid treatment or medical attention.
13. Employees shall use safe lifting techniques when required to lift heavy objects. No City of Manteca employee is expected to lift a heavy object that the employee cannot lift safely.
14. Personal protective equipment such as safety shoes, eye protection, work gloves respiratory protection, hearing protection, coveralls shall be worn by the employee as described by the job hazard analyses, and worn in an appropriate manner as to adequately protect the employee.
15. Materials, tools, equipment or other objects shall not be thrown within work areas or from buildings or structures.

City of Manteca

Incident Reporting and Investigation



This City of Manteca Incident Investigation Program has been reviewed and approved by the Administrative Services Director. Such authorization demonstrates the commitment by management to accept responsibility and implement the IIPP.

Administrative Services Director Signature

Effective Date: _____



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City of Manteca

1.0 Background

This City of Manteca Incident Investigation Program has been designed to meet the requirements of the California and Federal Occupational Safety and Health Administration regulations. One of the keys to a successful program includes unbiased, prompt and accurate incident investigations. The purpose of incident investigations is to prevent similar incidents from occurring again.

Incident Investigation performed by the City of Manteca will comply with Cal/OSHA requirements found in the Cal/OSHA General Industry Safety Orders Title 8 paragraph 3203 (8 CCR 3203).

2.0 Scope

The written Incident Investigation Program is applicable to employees working at City of Manteca facilities and customer sites.

The City of Manteca will investigate and implement corrective actions for all incidents, including but not limited to:

- Injuries to City employees
- Property damage
- All fires, regardless of size
- Vehicle Accidents
- Near misses

Safety research indicates that for every major incident there are approximately 600 near misses. Identifying root causes and taking corrective actions before a serious incident occurs can avoid similar events that could potentially result in a major injury or other type of loss. In other words, by managing near misses and the less severe incidents, major losses can be prevented.

3.0 Roles and Responsibilities

3.1 Department/Agency Head Responsibilities

The Department/Agency Head shall:

- Ensure that all incidents are properly investigated
- Ensure immediate and long-term corrective actions are taken to prevent recurrence



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- Maintain Incidents permanently on file
- Submit Incident report (Appendix A) to Administrative Services within seven days upon receipt from supervisor.

3.2 Supervisors

Supervisors shall:

- Conduct immediate initial investigations
- Report all incidents to management as soon as possible
- Collect and preserve evidence that may be useful in an investigation
- Conduct interviews with witnesses in a polite, professional manner
- Take action to prevent further injuries or property damage from secondary effects of the incident
- Submit Incident report (Appendix A) to department manager within two days of the incident.

3.3 Employees

All employees are to immediately report all incidents to their supervisor or department manager as soon as possible, and assist as directed in the investigation. All hazardous conditions are to be reported as well.

4.0 Incident Investigation Procedures

4.1 Initial Actions

Steps to be taken immediately include:

- Provide first aid for injured persons (use universal precautions per the Bloodborne Pathogens Program)
- Notify emergency responders (fire, paramedics) as necessary
- Take action to prevent further injuries or property damage from secondary effects of the incident
- Secure the area. Do not disturb unless a hazard exists
- Identify potential witnesses



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4.2 Initial Investigation Steps

After the area is secure, injured people have received appropriate medical attention, and appropriate notifications have been made, then efforts can concentrate on initiating the investigation.

The longer the delay in examining the incident scene and interviewing witnesses, the greater the possibility of obtaining erroneous or incomplete information. Additionally, if the investigation process is delayed, the message sent to personnel is "the injury was not important to the organization." Intended or not, this message obviously is not what we want to convey.

Steps to be taken at this stage:

Photographs or videotapes of the scene and damaged equipment should be taken from all sides and from various distances. Sketches or drawings could also be pertinent to the investigation. This is especially important when the investigation team is not able to visit the incident scene.

Steps to be taken at this stage include:

- Photographs or videotapes of the scene and damaged equipment should be taken from all sides and from various distances. Sketches or drawings could also be pertinent to the investigation.
- Collect basic, background information (Who, What When, Where)
- Identify actual witnesses and other personnel who may have knowledge of the operations being performed at the time of the incident.

4.3 Detailed Investigation Steps

It is essential that proper information and data gathering take place at all times during the investigation. The accuracy and thoroughness with which the investigators obtain and record information and data will largely determine the quality of the final report and the effectiveness of corrective actions.

Remember we are fact finding, not fault finding.

For minor incidents, the information may be gathered by the supervisor or other personnel immediately following the incident. Based on the complexity of the situation, this information may be all that is necessary to enable the investigation team to analyze the incident, to determine the root cause and to develop solutions.



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More complex situations may require the investigation team to revisit the incident site or re-interview key witnesses to obtain answers to questions that may arise during the investigation process.

The detailed account of the incident should include the following elements:

- Sequence of events
- Extent of damage
- Accident type
- Source (energy, hazardous material, etc.)

Witnesses are to be interviewed and give their accounts of the incident as soon as possible. Interviewers should be experienced and not ask leading questions. Interviews should involve the following:

- An explanation of the purpose of the investigation (accident Prevention)
- The interviewer should listen, let the witness speak freely, and be professional, courteous and considerate
- The interviewer should take notes without distracting the witness. Use a tap recorder only with the consent of the witness
- Use sketches, photos and diagrams to help the witness
- Emphasize areas of direct observation. Label hearsay accordingly
- Do not argue with the witness
- Record the exact words used by the witness to describe each observation
- Identify each witness (name, address, occupation, years of experience)

4.4 Identify Causal and Contributing Factors, and Root Causes

Safety research also indicates that 90% of incident root causes can be traced to unsafe acts while only 10% are the result of unsafe conditions.

This section describes WHY the incident or near miss occurred. Avoid repeating what happened (Description of Incident) and focus instead on causal and contributing factors. It is important to investigate beyond mere symptoms to identify fundamental causes and contributing factors, which led to the event. Only then can accurate root causes be identified.

Any incident may have one or more root causes.



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Possible unsafe acts causal and contributing factors include:

- Unauthorized use of equipment
- Horseplay
- Not using proper personal protective equipment (PPE)
- Under the influence of drugs or alcohol

Possible unsafe conditions causal and contributing factors include:

- Ergonomic hazards
- Improper use of PPE
- Inadequate machine guarding

Root causes can now be identified, and corrected. Examples of root causes include:

- Lack of skill or knowledge.
- Correct way takes more time and/or requires more effort.
- Short-cutting standard procedures is positively reinforced or tolerated.
- Person thinks that there is no personal benefit to always doing the job according to standards.
- Lack of or inadequate operational procedures or work standards.
- Inadequate communication of expectations regarding procedures or standards.
- Inadequate tools or equipment.

4.5 Identify Corrective Actions

Note that each of the root causes listed above have easily identified corrective actions. For example, “lack of skill or knowledge” can be corrected with additional training. Actually, many of the root causes can be corrected by counseling and training. Repairing or replacing inadequate equipment can correct unsafe conditions. Remember however, that unsafe conditions account for only about 10% of all workplace incidents.

4.6 Prepare Report

The incident report (Appendix A) is the primary tool to document root causes and



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corrective actions. It can be used a a tool to counsel an employee or to follow up to see that corrective actions have been implemented. When complete, the incident report should be forwarded to Department Management and Administrative Services.

4.6 Implement Corrective Actions and Follow Up

The supervisor will usually be the person charged with implementing corrective actions. This is the best way to foster and attitude of safety with employees. If there are items to procure as part of the corrective action, department management will likely need to be involved.

Department Managers are charged with follow up, usually in a week or two, to see if the corrective actions have been implemented and additionally assessing if the corrective actions are effective in correcting the situation that led to the incident.

5.0 Training

Training in the elements of this procedure are to be provided to management and supervisory personnel who may be required to participate in incident investigation.



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APPENDIX A

Incident Investigation Form



City of Manteca

Accident/Exposure Investigation Report

City of Manteca

(Use additional sheets if necessary)

Date and Time of Accident: _____

Location & Job Task Being Performed: _____

Accident Description: _____

Workers Involved (Names & Tasks: _____

Root Cause(s) of Incident: _____

Corrective Action Recommended: _____

Corrective Actions Assigned & Completion Dates: _____

Manager Responsible for Completing Investigation: _____

Date Investigation Completed: _____ Date Corrective Actions Completed: _____

Safety Manager: _____ Date: _____

Attach all diagrams, sketches and photos to the original report



Section 1: PURPOSE

The purpose of this policy is to define the responsibilities and rules for the use of City of Manteca (City) vehicles and equipment, and privately owned vehicles used for City business. This policy applies to City officers, employees, and other authorized individuals as specified in this policy. This policy will take the place of all previous City vehicle policies and resolutions of the City Council related to these topics.

Section 2: POLICY

1. Employee Responsibilities

- a) Responsible Driving: Each City driver shall drive responsibly, anticipate emergency situations and make every effort to avoid accidents. All employees operating a vehicle on City business represent the City and shall always project a professional and responsible image to the public.
- b) Following Traffic Laws: Employees are expected to be knowledgeable of, and follow, all applicable Federal, State and local traffic laws.
- c) Driver's License: City employees operating vehicles or equipment on City business must have a valid State of California driver's license. Definition of "valid" means a current California driver's license without driving restrictions while at work, suspensions, or any other non-validating activity.
- d) Suspended, Revoked or Restricted Driver's License: City employees who are required to have a valid California driver's license to operate vehicles or equipment on City business shall immediately inform their supervisor in the event their driver's license is suspended, revoked or is otherwise restricted in a way that impacts the employees' ability to perform their job (*see 2a – 2f below*). Failure to inform a supervisor or other City management staff member shall result in disciplinary actions per the City Driver's License Violation Policy.

2. Division/Department Responsibilities

- a) Enforcement: Department Directors are responsible for enforcing this policy within their Departments.
- b) Driver's License Checks: City shall require DMV driver's license checks for new employees that are required to drive as part of their duties with the City.

- c) Drivers License Verification: The City's Administrative Services Department is responsible for verifying that all full and part-time employees who drive on City business have a valid California driver's license and that the license is of the appropriate class for the vehicle(s) they operate. This divisional obligation does not diminish the employee's obligations pursuant to this policy's section 1.c. and 1.d. above.
- d) DOT Driver Records: The Administrative Services Department shall maintain accurate records of employees who are required by Department of Transportation (DOT) regulations to have a commercial driver's license. At a minimum the record shall include a copy of the employee's current medical card, and a copy of the most recent DMV Driver Record Information.
- e) Pull Notice Program: City employees are enrolled (new employees will be added upon hire) in the Department of Motor Vehicles (DMV) "Pull Notice Program". Copies of the employee's activity reports are kept and tracked by the Administrative Services Department on an activity occurrence or annual basis.

Section 3: AUTHORIZED USE OF CITY VEHICLES

- a) Authorization: City owned vehicles shall be driven only by appropriately licensed and authorized City officers or employees or other authorized persons. Authorization shall be by the appropriate Department Director, City Manager, or City Council.
- b) Authorized Riders: No person shall be permitted to ride in a City vehicle unless such person is a City officer or employee on official City business, is a person conducting official City business for or with the City, or is a passenger authorized to be in said vehicle by the responsible Department Director, City Manager or City Council.
- c) City Business Use Only: City vehicles shall be used for Official City business only.
- d) Volunteers: Volunteers are not authorized to drive City vehicles even if the vehicle will be used only on official City business with the exception of SHARP and SAFE.
- e) Extra Help Employees: Extra Help (e.g., Manpower Temp) employees may be authorized to drive City vehicles with the approval of their division manager. The Department Director is responsible to insure that these employees have a valid California driver's license and of the appropriate class for the vehicle they are driving.

- f) Independent Contractors: Independent Contractors are not authorized to drive City vehicles even if the vehicle will be used only on official City business.
- g) Other Local Agencies: Employees of other local public agencies (entity) or local community based organizations may be authorized to use City vehicles if there is a written agreement between the City and the entity or organization that states that the use of the City vehicle is authorized by the City and is a program related to City business (including emergency situations) and after the entity or organization has met the City's insurance requirements.

Section 4: OPERATING A CITY VEHICLE

- a) Seat Belt Usage: The driver and all passengers in a City vehicle or in a private vehicle being used on City business shall use Seat belts. [California Vehicle Code (CCV) 27315 (d)(1), (e)]
- b) Child Safety Seats: All children riding in City vehicles shall be properly seat belted. Child safety seats shall be used as required by the CVC.
- c) Vehicle Operation: Drivers shall be familiar with the manner of operation of vehicles that they operate on City business. If drivers are unsure of the operation of their vehicle, they should check the owner's manual in the glove box of the car or contact Vehicle Maintenance for assistance.
- d) Attentive Driving: Drivers shall remain attentive to driving at all times. Use of cellular phones, eating or drinking, dealing with passengers or other distractions while the vehicle is moving should be avoided. Whenever possible drivers should pull off the road and stop when having to deal with distractions in the vehicle.
- e) Smoking: Smoking is prohibited in all vehicles owned, leased or operated by the City.
- f) Alcohol Drugs and Other Intoxicants: Consumption of alcohol, drugs or other intoxicants while operating City vehicles or equipment or while operating a privately owned vehicle on City business is strictly prohibited. (As described in the Manteca City Policy.)
- g) Dangerous or Defective Vehicle: Any City owned vehicle, or privately owned vehicle while being used for City business, shall not be operated when in a known dangerous or defective condition.
- h) Reporting an Unsafe Vehicle: When a City vehicle is found to be in a dangerous or defective condition, it shall be reported to Vehicle Maintenance as soon as is practical.

- i) Visual Inspections: Employees shall conduct a visual inspection of the City assigned vehicle or pool vehicle for damage prior to use. Any damage or safety problems observed shall be reported to Vehicle Maintenance immediately upon discovery.
- j) Unattended/Parking City Vehicles: Employees who operate City vehicles must “*safely park*” the vehicle by placing the vehicle in park (in gear if manual transmission), setting the parking (emergency) brake, and, if necessary, turning the engine off when leaving a vehicle unattended. This includes, but is not limited to, when you are out of the vehicle briefly (e.g., opening a gate). All vehicles shall be *safely parked* and locked when not in use.
- k) Traffic Citations: Any employee who receives a traffic citation other than for illegal parking while operating an City owned vehicle, or while operating a privately owned vehicle on City business, shall report such citation to his/her Department Director. **NOTE** - Any traffic or parking citation, through no fault of the employee, is the sole responsibility of the driver regardless of the vehicle being used. An employee who is convicted of a moving vehicle violation shall be subject to disciplinary actions as established in the City’s Rules and Regulations and Policy’s and Procedures.
- l) Hands Free Driving: Your job responsibilities may require occasional or regular use of a cell phone. While driving a city vehicle or operating a personal vehicle performing City business, employees are **prohibited** from using a wireless telephone unless the device is configured to allow hands-free listening and talking. This includes “text messaging.” It is imperative you remember when driving a vehicle to keep your eyes on the road and that safety comes first. Minimize the risk of accidents by following these procedures:
- If your job requires you to be accessible at all times, a hands-free device must be used.
 - Review the features of your cell phone so you are familiar with the phone.
 - Make sure the cell phone is kept within easy reach.
 - Restrict use to briefly answering calls, when possible. Advise the caller that you are driving and the call must be kept short.
 - Suspend calls in heavy or hazardous traffic or bad weather.
 - Do not take notes or look up information while driving.

- Whenever possible, wait to place a call until after you have safely stopped your vehicle and parked.

You will be solely responsible for any traffic infractions or other violations resulting from your use of a cell phone when driving while working for the City of Manteca. In addition, any violation of this policy will result in disciplinary action, up to and including termination.

If a hand-free device is unable to be used, the employee may either;

- Safely pull to the side of the road, stop and park the vehicle, then talk on the phone; or
- Not answer the phone, waiting until it is safe to receive the voicemail or return the call.

Exception: Drivers are allowed to make emergency phones call without using a hands-free device to contact a law enforcement agency, reporting a medical emergency, a traffic collision, or other emergency services agencies or entity.

Section 5: VEHICLE ACCIDENTS OR DAMAGE

- a) Safe Driving: It is the responsibility of the driver of City owned vehicles, or privately owned vehicles while being used for City business, to exercise reasonable care to avoid impediments or obstructions in the path of the vehicle that may cause damage to the vehicle, other vehicles or property, or injury to drivers, passengers and pedestrians. As such, any employee discovered (after internal or third party investigation) not to be exercising reasonable care (e.g., convicted of a violation, running a red light, etc.) of an City vehicle, shall be subject to disciplinary actions as stated in the City's Policy.
- b) Accident / Damage Reporting: All accidents and vehicle and property damage in an City vehicle or piece of equipment or a privately owned vehicle being used on City business, **regardless of severity**, shall be reported immediately to the employee's supervisor, to the appropriate law enforcement, and to Vehicle Maintenance. Additionally, any incidents involving a City vehicle requiring towing services shall be reported immediately and an incident report submitted.
- c) Timely Reporting of Accidents: Officers and employees involved in any accident in a City owned vehicle or a privately owned vehicle being used on City business shall make a complete report of such accident to the Administrative Services Department within one (1) business day.
- d) Accident Report Forms: Accident reports shall contain information on other vehicles, drivers, property involved, witnesses, weather conditions, road conditions, and any other pertinent information regarding such accident.

Accident Report Forms are located in the glove compartment on all City vehicles or may be obtained from Vehicle Maintenance or Administrative Services.

Section 6: TAKE HOME VEHICLES

- a) Authorized Assignment: Take home vehicle assignments are to be limited to those staff engaged in immediate, first line, emergency response for critical services or when a take home vehicle assignment results in an economy and/or efficiency that is in the best interest of the City.

Section 7: USE OF PRIVATELY OWNED VEHICLES ON CITY BUSINESS

- a) Responsibility: Departments are responsible for determining when it is most advantageous to the City for an employee to use a privately owned vehicle on City business. Factors to be considered include: availability of City vehicles, cost of a City vehicle vs. mileage reimbursement, the appropriateness of the vehicle for the required use and best use of employees' time and operational efficiency.
- b) Insurance Requirements: Employees who drive a privately owned vehicle on City business must maintain automobile insurance that complies with the State of California minimum requirements for bodily injury and property damage. Authorization must be secured from Administrative Services prior to using a personal vehicle for City business.
- c) Primary Insurance Coverage: If an employee is involved in an accident in a privately owned vehicle, even though conducting authorized City business, the employee's automobile insurance is primary to any other coverage per the CVC.
- d) Exclusive Use: No employee shall travel on City business exclusively in a privately owned vehicle without the approval of his/her Department Director.
- e) Reimbursement Claims: When City employees use a privately owned vehicle on City business they shall be reimbursed at the current mileage rate provided by the Internal Revenue Service. Claims for mileage reimbursement shall be submitted on the proper claim form and processed in accordance with the City Accounting Departments procedures.

- f) Motorcycles: No employee shall operate a motorcycle on City business without specific authorization of the City Manager and the Administrative Services Director.

Section 8: ADVERSE ACTION

- a. Failure to Comply: Failure to comply with this policy may result in disciplinary action as established in the City's Rules and Regulations and Policy's and Procedures.

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Hazard Communication Program



This Hazard Communication Hazard Communication Program has been reviewed and approved by the Administrative Services Director. Such authorization demonstrates the commitment by management to accept responsibility and implement the IIPP.

Administrative Services Director Signature

Effective Date: _____



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Section 1: Introduction

1.1 Policy Statement and Program Approval

This City of Manteca Hazard Communication Program (HAZCOM) has been reviewed and approved by the General Manager. Such authorization demonstrates the commitment by management to accept responsibility and implement the HAZCOM Program.

It is the policy of City of Manteca that employees follow and adhere to the requirements set forth in this HAZCOM Program.

1.2 Purpose

The purpose of this HAZCOM program is to promote and maintain a safe and healthful workplace by providing a comprehensive approach to the prevention of accidents and injuries from hazardous materials. Each employee is expected to understand and adhere to this HAZCOM program.

In accordance with Title 8, California Code of Regulations, Section 5194, (8 CCR 5194) Hazard Communication, City of Manteca establishes this HAZCOM program as part of its employee safety and health program.

1.3 Scope

The scope of this Hazard Communication Program includes all agency/institutional operations and staff.

Section 2: Roles and Responsibilities

2.1 Department Heads

Department heads will implement the Hazard Communication Program by:

- Directing all supervisors to identify what workplace materials are hazardous, and to identify employees this may affect.
- Providing all employees with the information, training, and equipment they need to protect themselves and others.
- Enforcing compliance with this program



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2.2 Supervisors

Supervisors are responsible for day-to-day implementation, monitoring, and maintenance of the Hazard Communication Program within their assigned work areas. Supervisors' main Hazard Communication responsibilities include:

- Compiling the inventory of hazardous materials (Appendix A)
- Obtaining Material Safety Data Sheets (MSDS) for all hazardous materials. This includes ordering an MSDS the first time a new hazardous material is ordered.
- Providing HAZCOM program training to all employees
- Checking that adequate warning labels are on every container of hazardous materials
- Making sure MSDS are available to all employees
- Seeing that employees are wearing proper Personal Protective Equipment (PPE) whenever handling hazardous materials
- Enforce compliance with this policy.

2.3 Employees

Each City of Manteca employee is responsible for complying with management direction regarding hazardous substances and the provisions of this HAZCOM program. Employees are responsible for reading and understanding the MSDS and label precautions prior to working with a hazardous material. All employees of the City who work with or have the potential to work with hazardous materials must be trained in their responsibilities within the scope of the Hazard Communication Program.

Section 3: Definitions Applicable To This Plan

ACGIH: American Conference of Governmental Industrial Hygienists. An organization of professional personnel in governmental agencies or educational institutions engaged in occupational safety and health programs. ACGIH develops and publishes recommended



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occupational exposure limits for hundreds of chemical substances and physical agents.

Carcinogen: A chemical is considered to be a carcinogen if it has been evaluated by the International Agency for Research on Cancer (IARC), and found to be a carcinogen or potential carcinogen; or it is listed as a carcinogen or potential carcinogen in the Annual Report on Carcinogens published by the National Toxicology Program (NTP).

CAS: Chemical Abstract Service.

Flash Point: The temperature at which a liquid will give off enough flammable vapor to ignite. There are several flash point test methods, and flash points may vary for the same material depending on the method used, so the test method is indicated when the flash point is given.

Hazardous Material: In a broad sense, a hazardous material is any substance or mixture of substances having properties capable of producing adverse effects on the health or safety of a human being. In 1971 the Occupational Safety and Health Administration (OSHA) adopted the following definition in regulations affecting employers in operations subject to the federal Longshoremen's and Harbor Worker's Compensation Act:

- Has a flash point below 140 degrees Fahrenheit, closed cup, or is subject to spontaneous heating.
- Has a threshold limit value below 500 ppm for gases and vapors, below 500 mg/m³ for fumes, and below 25mppcf for dusts.
- A single dose oral LD50 below 500 mg/kg.
- Is subject to polymerization with the release of large amounts of energy.
- Causes first degree burns to skin in short time exposure, or is systemically toxic by skin contact.
- In the course of normal operations, may produce dusts, gases, fumes, vapors, mists, or smokes that have one or more of the above "characteristics."

Label: Any written, printed, or graphic material, displayed on or affixed to containers of hazardous chemicals.

MSDS: Material Safety Data Sheet; written or printed material concerning a hazardous chemical.

NFPA: National Fire Protection Association; an international voluntary membership organization to promote/improve fire protection and prevention and establish safeguards



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against loss of life and property by fire.

PEL: Permissible Exposure Limit; an exposure limit established by OSHA regulatory authority. May be a time weighted average (TWA) limit or a maximum concentration exposure limit.

PPM: Parts per million; a unit for measuring the concentration of a gas or vapor in air parts (by volume) of the gas or vapor in a million parts of air. Also used to indicate the concentration of a particular substance in a liquid or solid.

Reactivity: A description of the tendency of a substance to undergo chemical reaction with the release of energy.

TLV: Threshold Limit Value: a term used by ACGIH to express the airborne concentration of a material to which nearly all persons can be exposed day after day, without adverse effects. ACGIH expresses TLV's in three ways:

- **TLV-TWA:** The allowable Time Weighted Average concentration for a normal 8-hour workday or 40-hour work week.
- **TLV-STEL:** The Short Term Exposure Limit or maximum concentration for a continuous 15 minute exposure period (maximum of four such periods per day, with at least 60 minutes between exposure periods, and provided that the daily TLV-TWA is not exceeded).
- **TLV-C:** The Ceiling exposure limit, the concentration that should not be exceeded even instantaneously.

Section 4: Written Program

4.1 Program Elements

Per Cal-OSHA regulations found at 8 CCR 5194, this written program complies with the requirements for a written program including the following elements:

- Labels and other forms of warning
- Material Safety Data Sheets (MSDS)
- Employee information and training
- Procedures for non-routine tasks



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- Assemble the chemical inventory

A chemical inventory of hazardous chemicals shall be assembled at each City location. The chemical inventory shall include the manufacturer's name, product name and hazard classification. The following procedures apply:

- Make a list of all the hazardous chemicals in the work place.
- Update the list of hazardous chemicals whenever a new one is introduced in the work place.
- Allow employees to review the list of hazardous chemicals, posting this in a conspicuous location at the worksite, or including the inventory as Appendix A of this Program

4.2 Program Availability

City of Manteca will make this written HAZCOM program available, upon request, to employees, their designated representatives, Cal-OSHA representatives, and NIOSH, in accordance with the requirements of section 8 CCR 3204(e).

Section 5: Labels

5.1 Basic Label Requirements

To be in compliance with 8 CCR 5194, each container of a hazardous material must be labeled to identify the hazards of that material. All manufacturers' containers should maintain the manufacturer's labeling including hazard warnings. Labels are to include the following information:

- Identity of the hazardous substance(s)
- Appropriate hazard warnings
- Name and address of the manufacturer, importer, or other responsible party

Supervisors are to ensure all hazardous chemical containers in the work place are properly labeled, tagged or marked with the chemical identity and the appropriate hazard



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warning.

- Existing labels on incoming containers shall not be removed or defaced.
- If existing labels on incoming containers received from suppliers already convey the required information, new labels need not be affixed.
- Containers which are intended only for immediate use to transfer a hazardous substance from a labeled container need not be labeled provided that such container, upon completion of the transfer, shall remain empty and devoid of any hazardous residue.
- Inspect manufacturer labels to ensure they are legible and in good shape.
- Ensure the name used on the container label matches the name on the MSDS for that substance as well as the name on the inventory of hazardous chemicals.
- Check hazardous chemical containers that are received (or leave the work place) to ensure that they contain the chemical identity, appropriate hazard warning, and the name and address of the manufacturer of the chemical.

5.2 Materials Transferred to Another Container

When small quantities of a hazardous material are removed from larger containers, the smaller containers must be labeled with the chemical identity and all appropriate hazard warning information prior to issue. An exception to this is small quantities of chemicals, which will be used during the same work shift by the individual who did the chemical transfer. If the hazardous material remains in the transfer container beyond the work shift it was transferred, it must be appropriately labeled with identity and hazard warnings.

5.3 Acceptable Labeling Systems

There are several acceptable commercially available labeling systems such as those created by the National Fire Prevention Association (NFPA) and Hazardous Materials Identification System (HMIS). Examples of these and an explanation of some of the terminology are shown in Appendix B.



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Section 6: Material Safety Data Sheets (MSDS)

6.1 Basic MSDS Requirements

MSDSs must be provided by the manufacturer, distributor, or importer with first shipment of a hazardous material, or when the item's information changes. Each MSDS provides a detailed description of the potential hazards of a product and the precautions needed to handle, use and store the material in a safe manner

City of Manteca supervisors will maintain copies of all MSDS for each hazardous material in the workplace, and will be readily accessible during each work shift to employees when they are in their work area.

If there is not an MSDS for a hazardous material, contact your supervisor or safety manager, who will obtain the MSDS from the supplier, or other sources.

6.2 MSDS Contents

The MSDS should contain the following sections. If there is no relevant or applicable information, it should be so stated on the MSDS. It is not permissible to have blank spaces on a MSDS. The mandatory items for inclusion are:

- Trade name (product identity, same as used on the label)
- Chemical and common name and Chemical Abstract Service (CAS) numbers of each hazardous ingredient
- The physical and chemical properties such as vapor pressure, flashpoint and solubility of the chemicals
- The specific acute (short-term) and chronic (long-term) health hazards, including the signs and symptoms of illness and medical conditions (use simple or lay terms), which may be aggravated by exposure
- The potential routes of entry of the hazardous substance(s) into the body, such as inhalation, skin contact, or ingestion
- The permissible exposure limits published and/or recommended limits for the hazardous substance(s) OSHA Permissible Exposure Limit (PEL), the American Conference of Governmental Industrial Hygienist (ACGIH) Threshold Limit Value (TLV) listings, and any other limit recommended by the manufacturer



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- If the hazardous substance(s) is listed as a carcinogen by the National Toxicology Program (NTP), the International Agency for Research on Cancer (IARC) or the Occupational Safety and Health Administration (OSHA)
- The precautions necessary for the safe handling, use and storage, including the protective measures for repair and maintenance of contaminated equipment and spill clean-up procedures
- The known control measures, including engineering controls, work practices, and personal protective equipment necessary to protect against the hazards
- Emergency and first-aid procedures
- The date of preparation of the MSDS or the date of the last change in contents
- The name, address and phone number of the party responsible for preparing the MSDS. When new hazard data is available or the formulation of the product changes, manufacturers are required to furnish a new MSDS

A more detailed explanation of the MSDS contents can be found in Appendix C.

Section 7: Training

7.1 Basic Training Requirements

City of Manteca personnel who work with, or are potentially exposed to, any chemical material that is deemed to be hazardous, based on label or MSDS information, will receive appropriate training provided by their supervisor or safety manager. New employee and annual training is required for personnel working with hazardous materials. Employees will also be trained on any new materials introduced into the workplace or when new information regarding existing materials is brought to the attention of City of Manteca.

7.2 Training Contents

HAZCOM training must include the following elements:

- Explanations of methods and observations used to detect the presence or release of a hazardous substance in the work place. This will include an explanation of industrial hygiene monitoring, visual appearance or odor of chemical being



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released, etc.

- The physical and/or health hazards of chemicals in the work area
- Steps personnel can take to protect themselves from recognized hazards, including specific procedures that have been implemented to protect personnel from potential exposure to hazardous chemicals. This will include explanation of appropriate work practices, emergency procedures, and personal protective equipment to be used
- The details of the HAZCOM program, including the specifics of hazardous material labeling, Material Safety Data Sheets (location and how to read) and how personnel can obtain and use appropriate hazard information
- Training may be conducted in several ways. Formal classroom training, on-the-job instruction, and printed information sheets may all be used to convey hazard communication information.

The Hazard Communication & Chemical Safety Section of the Employee Handbook is included as Appendix D.

7.3 Non-Routine Tasks

Employees (for the purpose of hazard communication training) will be trained as to the hazards of substances used as part of non-routine job tasks, prior to performing those tasks. Non-routine tasks are those operations performed infrequently (once or twice a year, or periodically) or those jobs the employee has never performed before, such as repairing damaged equipment. Each supervisor is responsible for adequately training his employees of hazardous tasks. The specification for the job must include job safety requirements and information regarding possible hazards.

Section 8: Informing Contractors

It is the responsibility of the individual who hires or uses contractors, contract employees, or consultants to provide the following information to those who will be (or whose employees will be) directly exposed to hazardous chemicals while on-site:

- Identity of hazardous chemicals to which they may be exposed while on the job site.



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- Precautions they may take to lessen the possibility of exposure by the use of appropriate protective measures.
- Location of the MSDS for all chemicals to which they may potentially be exposed.

It is the contractor's responsibility to inform his/her own employees about these hazards and precautions. Management or supervisors responsible for engaging any contractor or contract employee will obtain from the contractor a list of hazardous chemicals that the contractor intends to bring onto City property. This list will be made available to all employees who may be exposed to those chemicals.



APPENDIX A

CHEMICAL INVENTORY

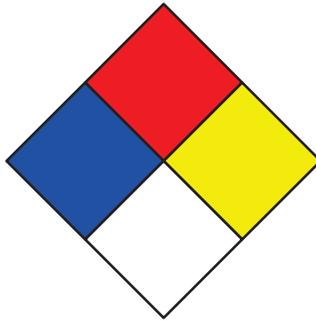


APPENDIX B

VARIOUS LABELING SYSTEMS



NFPA Labeling System



Number	Health	Flammability	Reactivity
1	Usually only slightly hazardous. Hazardous substances that produce irritation but minor injury with no treatment provided.	Will not spontaneously ignite.	Articles may be unstable if subjected to heat or under pressure. These items typically are stable but can become unstable at elevated temperatures or react with water.
2	Hazardous substances with continued exposure will cause temporary or permanent injury - if medical attention is not given quickly.	Materials and articles that must be heated prior to ignition.	These substances are typically unstable and will react violently with water or may form explosive complexes with water.
3	An extremely hazardous substance. Skin protection is essential and full protective clothing and equipment is required.	Materials that can be ignited at standard temperatures. This includes both liquids and solids.	Materials that explode if heated or may react with water.
4	Hazardous substances that cause severe injury or prove to be fatal even with quick medical attention. Example: Hydrofluoric acid	Highly flammable. These particular materials burn readily at atmospheric pressure and normal temperatures.	Materials that by themselves can readily explode or violently react at normal temperatures and pressures.
0	Combustible material	Will not burn nor ignite.	Normally very stable even when heated by fire or other external stimuli. Will not react with water.



HMIS Labeling System

Route of Entry	3 Health	
Health Hazards		
Physical Hazards		4 Flammability
Target Organs		3 Reactivity
	G Protective Equipment	

Colors

Red – Flammability

Blue – Health

Yellow – Physical Hazards

White – PPE

Numbers 0-4

4 – Maximum Hazard

3 – High Hazard

2 – Moderate Hazard

1 – Low Hazard

0 – No Hazard



APPENDIX C

EXPLANATION OF MSDS SECTIONS



MATERIAL SAFETY DATA SHEETS (MSDS)

MSDS are the centerpiece of the Hazard Communication Standard. They are your best tools for information on the specific hazards posed by products and the appropriate actions to take to protect employees from illness or injury. MSDS can be very helpful, but a little guidance may enable you to use them in the way the Hazard Communication Regulations intends. The goal of this section is to help the reader understand what information is provided on a MSDS, where to find it, and how to use it. After reading the following material, you should be able to pick up a MSDS, know where to look to find the information you need, and understand how to apply it to the problem, or questions, at hand. Please note that under state and federal Hazard Communication regulations, Island Energy is not responsible for the accuracy of the information presented on a MSDS, but Island Energy is responsible for the completeness. This means that all MSDS received must be given a quick appraisal to ascertain that all intended pages are present and that there are no blank sections.

Although the Hazard Communication Regulation does not require a standard format for MSDS, it does require that certain information be included. This results in MSDS which may appear very different, but which are typically organized into eight to ten sections, each addressing an aspect of the product. The sections do not always fall into the order noted below.

SECTION I - Product Identification

Lists the name and address of the manufacturer or distributor, and provides an emergency telephone number. This number is to be used in cases of overexposure, fire, or other emergency when it is determined that the information on the MSDS is not adequate under the given circumstances.

Section I also lists the name of the product, including both the trade name and the common (generic) name, if there is one. Often the chemical classification is also supplied.

Other information often provided includes the chemical formula, CAS number, DOT Hazard Class, and the date the MSDS was prepared. The CAS (Chemical Abstracts Service) number is a unique identification number assigned to each chemical which enables ready access to a variety of information in "Chemical Abstracts," a reference text. DOT Hazard Class refers to the hazard class assigned to the product by the U.S. Department of Transportation. Similarly, the UN/NA Number is a number used to identify the chemical during transportation, where "UN" and "NA" stand for the United Nations and North America, respectively.



The date the MSDS was prepared is important because you should always refer to the most recent MSDS for accurate information. Not only does new information on substances become available with time, but product formulations change. It is recommended that old MSDS be kept on file indefinitely for documentation purposes; that is, should the issue ever be raised, to demonstrate what reference and training materials were available to your employees at a particular point in time.

SECTION II - Hazardous Ingredients

Lists the components of the product which are hazardous. If a hazardous chemical is present in a mixture at 1% or greater, or 0.1% if the chemical is known or suspected to cause cancer, then it must be listed. Also listed in this section are the exposure limits for the chemical.

Permissible exposure limits (PELs) indicate average airborne contaminant levels to which nearly all workers may be exposed without significant adverse effect. Compliance with OSHA PELs are mandated by law. The Threshold Limit Values (TLVs) recommended by the American Conference of Governmental Industrial Hygienists (ACGIH) are guidelines for safe work practices.

PEL and TLV values are typically expressed as 8-hour time-weighted averages (TWA), that is, average airborne concentrations for an 8-hour work day and a 40-hour work week. Another type of permissible exposure level is the Short Term Exposure Limits (STEL), defined as 15-minute time-weighted average exposures which should not be exceeded at any time during a work day, even if the 8-hour TWA is below the TLV or PEL. Ceiling Limits are another type of permissible exposure limit which you may see listed. They are defined as concentrations which are not to be exceeded at any time.

Some MSDS may also include PELs which have been assigned to the product by the manufacturer.

Permissible exposure limits are expressed in parts per million (ppm) for gases and vapors or milligrams per cubic meter (mg/m³) for dusts.

SECTION III - Chemical and Physical Characteristics

Lists the appearance and color of the product and a number of characteristics, which on first glance, appear to have minimum practical value to you. Included are the temperature at which the material turns from a liquid to vapor (boiling point) and the temperature at which the material turns from a solid to liquid (melting point), the percent of the substance which will dissolve in water at normal temperature (solubility in water), the rate at which the material will evaporate compared to another solvent (evaporation rate), a measure of how dense the material is compared



to water or air (specific gravity), and another indication of how likely the material is to evaporate (vapor pressure).

With a little thought, some useful information can be developed from this section. A liquid with a low boiling point, say less than 100o F, is likely to become airborne more readily than one which boils at 200oF. The same is true of a liquid which has an evaporation rate greater than one or which has a measurable vapor pressure. All these factors indicate that the material may be available for exposure by inhalation and, depending on the health consequences of such exposure, it might be wise to work with the material only for short periods in a well-ventilated environment, and perhaps only if you are wearing respiratory protection.

The solubility in water and the specific gravity can tell you what will happen if the material is spilled into water. If the material is 100% soluble, then it will completely dissolve in the water. Otherwise, to some degree, the material will remain separate. The specific gravity indicates where the material will collect. If the specific gravity is less than one, the material will float on top of the water; if it is greater than one, it will sink to the bottom.

SECTION IV - Fire and Explosion Hazard Information

Lists the temperature at which the material will generate sufficient vapor to be ignited and the method of testing (flash point), the temperature at which the material will burst into flames, even without a source of ignition (auto-ignition temperature), the minimum percent of the material in air required for successful ignition (lower explosive limit or LEL) and the maximum percent which will support ignition (upper explosive limit or UEL). Also listed are the proper extinguishing agents to put out a fire involving the materials, and any unusual hazards posed by such fires, for instance, are any particularly toxic substances formed when the material burns.

SECTION V - Reactivity Information

Notes whether there are other materials with which the product is incompatible. Incompatible substances are those that may react violently when they come into contact.

This section also lists conditions under which the material should not be stored or handled. For instance, if the chemical is reactive with water or sensitive to high temperatures, a notation will be made.

Also listed will be comments on the stability of the chemical, that is, does it change in nature over time. Some substances become more dangerous as they age.



SECTION VI - Health Hazard Data

This section is usually divided into several subsections. They address both the short-term (acute) and long-term (chronic) health problems associated with exposure to the material. Additionally, they must address the health consequences of exposure by different routes of entry into the body, that is, what happens when it is inhaled, ingested, or comes into contact with the skin or eyes.

It is important to know the effects of acute exposures, and what parts of the body are most susceptible to injury. By being aware of the symptoms of overexposure, you can recognize when it is occurring and remove yourself from the area.

Unfortunately, it is possible to be exposed to substances at concentrations too low to produce acute symptoms but which result in chronic health problems. So it is not wise to rely upon acute symptoms to warn you of overexposure. It is best to minimize exposure whenever possible.

SECTION VII - Emergency and First Aid Procedures

Specifies appropriate responses to overexposure according to the route of entry and the level of exposure. This section will include information on how to respond to exposure by any of the routes of entry, that is, for exposure on the skin, in the eyes, in the lungs, or if ingested. Typically the first aid information presented is minimal (“remove to fresh air” or “wash from skin”) and simply recommends that the individual seek medical attention.

SECTION VIII - Precautions for Safe Handling and Use

This section addresses both the precautions to be taken when handling the product and the measure to be taken when it is spilled.

If exposure to the material by a particular route of entry poses a particular problem, it will be noted in this section and you will be referred to Section IX for guidance on appropriate personal protection. This section may also note whether it is important that the material be handled and stored only under certain circumstances, for instance, in a well-ventilated environment.

Cleaning of chemical spills requires specific training as per the Superfund Amendment and Reauthorization Act of 1986 (SARA). If a significant amount of hazardous chemical is spilled, unless there are trained individuals on staff and appropriate personal protective equipment is available, it is recommended an expert be called to abate the problem. Generally, only relatively small quantities of hazardous substances are used at Island Energy’s facilities. Consequently, personal protective equipment such as respirators and gloves which is supplied for handling the substances in normal use should also provide adequate protection during cleanup spills.



Section VIII also provides information on proper procedures for cleanup of spilled material and disposal of spilled or waste material.

SECTION IX - Control Measures

Presents information on the means of protecting yourself from exposure. Where appropriate, it notes the proper type of respirator, glove, eye protection, and clothing. It also describes any special ventilation requirements.

Additionally, this section often restates the information presented in section eight on methods of handling the product to minimize exposure.



APPENDIX D

HAZARD COMMUNICATION SECTION OF THE EMPLOYEE SAFETY HANDBOOK



Hazard Communication & Chemical Safety



Your job may involve the use and /or handling of chemicals or you may work in an area where others use chemicals (such as custodians) and you may be exposed to a hazardous substance. In either case, you have a *right to know* about the chemical hazards present in your workplace. Therefore we have a Hazard Communication Program, required by law, that will inform you of the specific chemical hazards present in your workplace. Please ask your Supervisor for the location of your department's Hazard Communication Program and Material Safety Data Sheets.

Please keep in mind that some chemicals are explosive, corrosive, flammable, or toxic. Other chemicals are relatively safe to use and store but may become dangerous when they interact with other substances. To avoid injury and/or property damage, persons who handle chemicals in any area of this agency must understand the hazardous properties of the chemicals.

Before using a specific chemical, safe handling methods and health hazards must always be reviewed. Supervisors are responsible for ensuring that the equipment needed to work safely with chemicals is accessible and maintained for all employees on all shifts.

Job Specific Training

Employees will receive on the job training from their supervisor. This training will cover the proper use, inspection and storage of necessary personal protective equipment and chemical safety training for the specific chemicals they will be using or will be working around.

General Chemical Safety

Assume all chemicals are hazardous. The number of hazardous chemicals and the number of reactions between them are so large that prior knowledge of all potential hazards cannot be assumed. Use chemicals in as small quantities as possible to minimize exposure and reduce possible harmful effects.

The following general safety rules shall be observed when working with chemicals:

- Read and understand the Material Safety Data Sheets.
- Keep the work area clean and orderly.

- Use the necessary safety equipment.
- Carefully label every container with the identity of its contents and appropriate hazard warnings.
- Store incompatible chemicals in separate areas.
- Substitute less toxic materials whenever possible.
- Limit the volume of volatile or flammable material to the minimum needed for short operation periods.
- Provide means of containing the material if equipment or containers should break or spill their contents.

Chemical Storage

The separation of chemicals (solids or liquids) during storage is necessary to reduce the possibility of unwanted chemical reactions caused by accidental mixing. Explosives should be stored separately outdoors. Use either distance or barriers (e.g., trays) to isolate chemicals into the following groups:

- Flammable Liquids: store in approved flammable storage lockers.
- Acids: treat as flammable liquids
- Bases: do not store bases with acids or any other material
- Other liquids: ensure other liquids are not incompatible with any other chemical in the same storage location.
- Lips, strips, or bars are to be installed across the width of storage shelves to restrain the chemicals in case of earthquake.

Chemicals will not be stored in the same refrigerator used for food storage.

Refrigerators used for storing chemicals must be appropriately identified by a label on the door.

Container Labels

It is extremely important that all containers of chemicals are properly labeled. This includes every type of container from a 5000-gallon storage tank to a spray bottle of degreaser. The following requirements apply:



- All containers will have the appropriate label; tag or marking prominently displayed that indicates the identity, safety and health hazards.
- All warning labels, tags, etc., must be maintained in a legible condition and not be defaced. Safety inspections shall check for compliance of this rule.
- Incoming chemicals are to be checked for proper labeling and Material Safety Data Sheets. Forward new MSDS to your supervisor for filing.

Emergencies and Spills

In case of an emergency, implement the proper Emergency Action Plan

- Evacuate people from the area.
- Isolate the area.
- If the material is flammable, turn off ignition and heat sources.
- Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures beyond those required to evacuate the area.

Housekeeping

- Maintain the smallest possible inventory of chemicals to meet immediate needs.
- Periodically review stock of chemicals on hand.
- Ensure that storage areas, or equipment containing large quantities of chemicals, are secure from accidental spills.
- Rinse emptied bottles that contain acids or inflammable solvents before disposal.
- Recycle unused laboratory chemicals wherever possible.
- **DO NOT** place hazardous chemicals in salvage or garbage receptacles.
- **DO NOT** pour chemicals onto the ground.
- **DO NOT** Dispose of chemicals through the storm drain system.
- **DO NOT** Dispose of highly toxic, malodorous chemicals down sinks or sewer drains.



MSDS Information

Material Safety Data Sheets are provided by the chemical manufacturer to provide additional information concerning safe use of the product. Each MSDS provides:

- Common Name and Chemical Name of the material
- Name, address and phone number of the manufacturer
- Emergency phone numbers for immediate hazard information
- Date the MSDS was last updated
- Listing of hazardous ingredients
- Chemical hazards of the material
- Information for identification of chemical and physical properties

Employee Use of MSDS

For MSDS use to be effective, YOU must:

- Know the location of the MSDS
- Understand the major points for each chemical
- Check MSDS when more information is needed or questions arise
- Be able to quickly locate the emergency information on the MSDS
- Follow the safety practices provided on the MSDS



AUTOMOBILE ACCIDENT/PROPERTY DAMAGE INVESTIGATION REPORT

Police Report # _____

Name of Employee: _____

Date of Accident/Incident: _____ Time Occurred: _____

Location of Accident/Incident: _____

Road Conditions: _____

City Property/Vehicle Involved: _____ Estimated Damages: \$ _____

Other Vehicle or Property: _____

Owner's Name and Address: _____ Work Phone: _____
Home Phone: _____

Other Party's Name & Address: _____

Describe Damage: _____ Estimated Damages: \$ _____

Where can damage be seen: _____

DESCRIPTION OF ACCIDENT/INCIDENT: (Diagram on Back.)

ANALYSIS: What actions, failure to take action, and/or unsafe conditions contributed directly to causing this accident/incident:

PREVENTABLE UNPREVENTABLE

PREVENTION: What action has been taken to prevent a recurrence?

INVESTIGATED BY: _____ SIGNATURE: _____

