



City of Corona Transit Service

400 South Vicentia Avenue

Corona, CA 92882

Agency Safety Plan

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Accountable Executive

Date

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Definitions

Accident means an Event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; an evacuation for life safety reasons.

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

Agency or Transit Agency means **City of Corona Transit Service**.

City of Corona Council means governing body of **City of Corona Transit Service**.

Caltrans means the California Department of Transportation

Chief Safety Officer means the adequately trained individual who has responsibility for safety and reports directly to the Transit Agency's chief executive officer.

CFR means Code of Federal Regulations.

Event means any Accident, Incident, or Occurrence.

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

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

Incident means an Event that involves any of the following: a personal injury that is not a serious injury, one or more injuries requiring medical transport, or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of the Transit Agency.

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

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

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

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

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

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

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

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

Safety Assurance means processes within 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 means 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) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a Transit Agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

Safety Performance Target (SPT) means a Performance Target related to safety management activities.

Safety Promotion means a combination of training and communication of safety information to support SMS as applied to the Transit Agency's public transportation system.

Safety Risk Assessment (SRA) means 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) means a process within the Transit Agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious injury means any injury which: (1) requires hospitalization for more than 48 hours, commencing within 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) means the condition in which a capital asset is able to operate at a full level of performance.

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

U.S.C. means United States Code.

Section 1 Transit Agency Information

City of Corona Transit Service is a **municipal authority** formed by the **Municipal Authorities Act of 1945**, which operates **fixed route and demand response service** in the city of Corona, Coronita, El Cerrito, Home Gardens in the area of Riverside County, California. **City of Corona Transit Service** does purchase transportation services from **MV Transportation**. **City of Corona Transit Service** is a recipient/subrecipient of Section 5307, local funds, and

Transportation Development Act LTF and STA funds. **City of Corona Transit Service does not provide transportation services on behalf of another entity.**

Subsection 1.1 Accountable Executive

City of Corona Transit Service's Accountable Executive is the **Community Services Director**. The **Community Services Director** is the single, identifiable person who has ultimate responsibility for carrying out this Agency Safety Plan and the City of Corona Transit Service's Transit Asset Management (TAM) Plan, and control or direction over the human and capital resources needed to develop and maintain both this Plan and the TAM Plan.

The **Community Services Director** is accountable for ensuring that the Agency's Safety Management Systems (SMS) is effectively implemented throughout the Agency's public transportation system. The **Community Services Director** is accountable for ensuring action is taken, as necessary, to address substandard performance in the Agency's SMS. The **Community Services Director** may delegate specific responsibilities, but the ultimate accountability for the Transit Agency's safety performance cannot be delegated and always rests with the **Community Services Director**.

Subsection 1.2 Chief Safety Officer

The **Community Services Director** designates the **Transit Program Manager** as **City of Corona Transit Service's** Chief Safety Officer who has the authority and responsibility for day-to-day implementation and operation of the Agency's SMS. The Chief Safety Officer holds a direct line of reporting to the Accountable Executive, **as shown in the organization chart in the Attachment "A"**, and has a strong working relationship with the operations and asset management functions at **City of Corona Transit Service**.

Section 2 Plan Development, Approval, and Updates

Caltrans developed the contents of this City of Corona Transit Service plan to meet requirements specified in 49 CFR Part 673 and comply with Part 673.11(d) regarding Caltrans' responsibility to develop an ASP for any small public transportation provider that is located in California. This Plan is based on the four (4) principles or pillars of the Safety Management Systems (SMS). SMS is defined as the formal, top-down, organization-wide, data-driven approach to managing safety risk and assuring the effectiveness of safety mitigations. It includes systematic policies, procedures, and practices for the management of safety risk. The four principles or pillars of SMS are: (1) Safety Management Policy; (2) Safety Risk Management; (3) Safety Assurance; and (4) Safety Promotion.

Subsection 2.1 Drafting the Plan

Caltrans drafted this Plan, thus meeting the requirements of 49 CFR Part 673.11(d). FTA will oversee compliance with the requirements of Part 673 through the existing Triennial Review processes.

Should **City of Corona Transit Service** no longer meet the definition of a small public transportation provider or choose to opt-out of the Caltrans Agency Safety Plan, within one year from the date of notifying the State of either development **City of Corona Transit Service** will draft and certify its own Agency Safety Plan. If the **City of Corona Transit Service** operates more

than 100 vehicles **City of Corona Transit Service** must fulfil requirements of systems operating more than 100 vehicles.

Subsection 2.2 Signature by the Accountable Executive and Approval by the Board

Pursuant to 49 CFR Part 673.11 (a)(1), this Agency Safety Plan and subsequent updates must be signed by the Accountable Executive and approved by **City of Corona Transit Service's** Board. **This plan is developed by City of Corona Transit Service and by signature on the first page of the plan, the Accountable Executive (Community Services Director) confirms the development of the Plan and approval by City Corona's City Council as specified in the Board Agenda found in Attachment "B".**

Subsection 2.3 Certification of Compliance

Pursuant to 49 CFR Parts 673.13(a) and 673.13(b), Caltrans certifies that it has established this Agency Safety Plan, meeting the requirements of 49 CFR Part 673 by July 20, 2020 and will certify its compliance with 49 CFR Part 673.

After Caltrans initial certification, and on an annual basis **City of Corona Transit Service** must update this Agency Safety Plan by July 20 in perpetuity. All Agency Safety Plan updates shall be signed by the Accountable Executive and approved by **City of Corona Transit Service's** Board.

FTA does not require this plan to be submitted to FTA. Instead, Caltrans will certify that it has established this Safety Plan, which fulfills the requirements under Part 673. FTA annually amends and issues the list of Certifications and Assurances. Caltrans will review such guidance for incorporation into the safety program as necessary.

Subsection 2.4 Plan Review and Updates

City of Corona Transit Service updates this Safety Plan when information, processes or activities change within the Agency and/or when Part 673 undergoes significant changes, or annually, whichever comes sooner. As **City of Corona Transit Service** collects data through its Safety Risk Management and Safety Assurance processes, shared with Caltrans and the local Metropolitan Planning Organization (MPO) as described in subsection 3.1 below, the MPO and Caltrans will evaluate **City of Corona Transit Service's** safety performance targets (SPTs) to determine whether they need to be changed, as well.

This Plan will be reviewed and updated by the Chief Safety Officer with the assistance of subject matter experts, each **January**. The Accountable Executive will approve any changes, then forward on to the City of Corona Council for approval.

This Plan may need to be reviewed and updated more frequently based on the following:

- We determine our approach to mitigating safety deficiencies is ineffective;
- We make significant changes to service delivery;
- We introduce new processes or procedures that may impact safety;
- We change or re-prioritize resources available to support SMS;
- We significantly change our organizational structure.

Section 3 Safety Performance Targets (SPTs)

Subsection 3.1 Target Development

City of Corona Transit Service includes SPTs in this Safety Plan. These targets are specific numerical targets set by **City of Corona Transit Service** and based on the safety Performance Measures established by FTA in the National Public Transportation Safety Plan. In the most recent version, the 2017 NSP3, FTA adopted four initial safety Performance Measures: (1) Fatalities, (2) Injuries, (3) Safety Events, and (4) System Reliability.

City of Corona Transit Service developed safety performance targets 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 and the safety performance goals set by Caltrans based on the past three (3) Calendar years of data. The Safety Performance Targets for **City of Corona Transit Service** for the year 2020 is expected to stay within 1% +/- of previous three years data pertaining to fatalities, injuries, safety events, and system reliability.

Note: Baseline data for each target will need to be provided by each agency for Caltrans to develop goals.

FTA requires Caltrans to coordinate with **City of Corona Transit Service** and the **Southern California Association of Government (SCAG)** to the maximum extent practicable. Pursuant to 49 CFR Part 673.15(a), **City of Corona Transit Service** will make safety performance targets available to **Southern California Association of Government** to aid in the planning process upon certification of this plan. Additionally, **City of Corona Transit Service** will transmit performance data against the safety performance targets to Caltrans and the Southern California Association of Government on an annual basis.

Caltrans will conduct coordination meetings with the **Southern California Association of Government** for the selection of State and MPO safety performance targets and goals.

CCTS Safety Performance Targets Calculation Methodology

CCTS will develop Safety Performance Targets (SPTs) that will be reviewed and updated annually. The specific SPTs are based on the safety performance measures established under the National Public Transportation Safety Plan. CCTS SPTs are based on the past three (3) Calendar years' data. The CCTS average SPTs for the year 2022 are derived from averages calculated from cumulative calendar year metrics of 2019, 2020, and 2021 CCTS expects to maintain the CCTS SPTs within 1% of average derived SPTs calculated from the previous three years of data pertaining to fatalities, injuries, safety events, and system reliability. The rate is calculated based on Vehicle Revenue Miles (VRM) per 100,000. For example: Fatalities ÷ by VRM x 100,000; Injuries ÷ by VRM x 100,000; Safety Events ÷ by VRM x 100,000 and System Reliability (VRM ÷ Road Calls).

Three (3) Year Average *

Mode of Transit Service	Fatalities (Total)	Fatalities ([safety events/VRM] X 100,000)	Injuries (Total)	Injuries ([safety events/VRM] X 100,000)	Safety Events (Total)	Safety Events ([safety events/VRM] X 100,000)	System Reliability (VRM/Road Calls)	Annual VRM (Total)
Fixed Route Service (MBPT)	0	0	0	0	6	3.35	3,928	166,628
Corona Dial-A Ride/Paratransit (DRPT)	0	0	0.3	0.18	6	4.03	25,793	121,377

* calculated averages from calendar years 2019 through 2020 CCTS performance metrics

2021 Calendar Year (CY)

Mode of Transit Service	Fatalities (Total)	Fatalities ([safety events/VRM] X 100,000)	Injuries (Total)	Injuries ([safety events/VRM] X 100,000)	Safety Events (Total)	Safety Events ([safety events/VRM] X 100,000)	System Reliability (VRM/Road Calls)	Annual VRM (Total)
Fixed Route Service (MBPT)	0	0	0	0	3	1.93	4,451	155,794
Corona Dial-A	0	0	0	0.00	3	3.26	18,415	92,077

2020 CY

Mode of Transit Service	Fatalities (Total)	Fatalities ([safety events/VRM] X 100,000)	Injuries (Total)	Injuries ([safety events/VRM] X 100,000)	Safety Events (Total)	Safety Events ([safety events/VRM] X 100,000)	System Reliability (VRM/Road Calls)	Annual VRM (Total)
Fixed Route Service (MBPT)	0	0	0	0	6	3.49	3,513	172,119
Corona Dial-A Ride/Paratransit (DRPT)	0	0	0	0.00	1	1.10	22,761	91,044

2019 CY

Mode of Transit Service	Fatalities (Total)	Fatalities ([safety events/VRM] X 100,000)	Injuries (Total)	Injuries ([safety events/VRM] X 100,000)	Safety Events (Total)	Safety Events ([safety events/VRM] X 100,000)	System Reliability (VRM/Road Calls)	Annual VRM (Total)
Fixed Route Service (MBPT)	0	0	0	0	8	4.65	3,822	171,970
Corona Dial-A Ride/Paratransit (DRPT)	0	0	1	0.55	14	7.73	36,202	181,009

Section 4 Overview of the Agency’s Safety Management Systems (SMS)

SMS is a comprehensive, collaborative approach that brings management and labor together to build on the transit industry’s existing safety foundation to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more carefully. **City of Corona Transit Service’s** SMS focuses on applying resources to risk and is based on ensuring that the City of Corona Transit Service has the organizational infrastructure to support decision-making at all levels regarding the assignment of resources. Some key parts of **City of Corona Transit Service’s** SMS include:

- Defined roles and responsibilities;
- Strong executive safety leadership;
- Formal safety accountabilities and communication;
- Effective policies and procedures; and
- Active employee involvement

Furthermore, **City of Corona Transit Service**'s SMS have four distinct components, which are discussed in subsequent sections to this Safety Plan:

- Safety Policy
- Safety Risk Management
- Safety Assurance
- Safety Promotion

Section 5 Safety Management Policy

The first component of the **City of Corona Transit Service**'s SMS is the Safety Management Policy, which is the foundation of the **City of Corona Transit Service**'s safety management system. It clearly states the organization's safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. The Safety Management Policy clearly defines management and employee responsibilities for safety throughout the organization. It also ensures that management is actively engaged in the oversight of the system's safety performance by requiring regular review of the Safety Management Policy, budget and program by the designated Accountable Executive.

Subsection 5.1 Safety Management Policy Statement

Safety is a core value at City of Corona Transit Service, and managing safety is a core business function. City of Corona Transit Service will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. City of Corona Transit Service overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent to eliminate unacceptable safety risk in our transit operations.

City of Corona Transit Service will:

- Clearly, and continuously explain to all staff that everyone working within City of Corona Transit Service must take part and be responsible and accountable for the development and operation of the Safety Management System (SMS).
- Work continuously to minimize safety risks. Work to comply with and, wherever possible, exceed legislative and regulatory requirements and standards for passengers and employees.
- Work to ensure that all employees are provided appropriate safety information and training, are competent in safety matters, and assigned tasks commensurate with duties and skills.
- Reaffirm that responsibility for making our operations safer for everyone lies with all employees – from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established through the SMS.

Caltrans established safety performance targets to help measure the overall effectiveness of our processes and ensure we meet our safety objectives. City of Corona Transit Service will keep employees informed about safety performance goals and objectives to ensure continuous safety improvement.

Subsection 5.2 Safety Management Policy Communication

The Safety Management Policy is communicated throughout the Agency, to all employees, managers, and executives, as well as contractors, and to the City of Corona Council.

This is accomplished through various processes such as:

- Workshops/training sessions - Conducted for Senior Management, Directors, Managers, Supervisors. Once this Plan or any update to this Plan has been signed by the CEO/General Manager approved by the Board of Directors and certified by Caltrans it will become standard practice in perpetuity so that SMS becomes standard business practice. All Union representatives will be kept informed.
- New Hire Safety Orientation – All new employees regardless of their classifications will be trained about their roles and responsibilities pertaining to PTASP and the principles of SMS.
- Safety bulletins, email safety newsletter blasts to staff, toolbox/tailgate safety meetings and/or safety committee meetings

Subsection 5.3 Employee Safety Reporting Program

City of Corona Transit Service implemented a process that allows employees [and contracted employees] to report safety conditions to senior management, protections for employees who report safety conditions to senior management. The purpose, description and protections for employees to report unsafe conditions and hazards are described in the Employee Safety Reporting Program as below:

Purpose:

- a) To establish a system for City of Corona Transit Service employees to identify unsafe conditions or hazards at work and report them to their department management without fear of reprisal. However, disciplinary action could result if the condition reported reveals the employee willfully participated in or conducted an illegal act, gross negligence or deliberate or willful disregard of regulations or procedures, including reporting to work under the influence of controlled substances, physical assault of a coworker or passenger, theft of agency property, unreported safety events, unreported collisions, and unreported passenger injuries or fatalities.
- b) To provide guidelines for facilitating the timely correction of unsafe conditions or hazards by City of Corona Transit Service management.

Description:

- a) This program provides a method for City of Corona Transit Service management to identify, evaluate, and correct or avoid unsafe conditions or hazards, procedural deficiencies, design inadequacies, equipment failures, or near misses that adversely affect the safety of employees.

Examples of voluntary safety reports include:

- Safety hazards in the operating environment (for example, county or city road conditions),
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection),

- Events that senior managers might not otherwise know about (for example, near misses), and
- Information about why a safety event occurred (for example, radio communication challenges).

b) The program also involves recommending corrective actions and resolutions of identified unsafe conditions or hazards and/or near miss.

c) All employees have the obligation to report immediately any unsafe conditions or hazards and near miss to their immediate supervisor /department manager and may do so without fear of reprisal.

d) Unsafe conditions or hazards may also be identified as a result of occupational injury or illness investigations and/or by accident investigation.

e) Other means by which hazards may be identified are inspections/audits or observations made by the supervisors/management staff as referenced in agency's Safety Inspection Program.

f) Findings will be published immediately following mitigation actions. If employee identification is available, direct feedback regarding mitigation will be provided.

Subsection 5.4 SMS Authorities, Accountabilities, and Responsibilities

This Plan has assigned specific SMS authorities, accountabilities, and responsibilities to the designated Accountable Executive; Chief Safety Officer; Agency's Leadership/Executive Management; and Key Staff/Employees as described below:

Subsection 5.4.1 Accountable Executive

City of Corona Transit Service's Accountable Executive is Community Services Director. The **Community Services Director** is accountable for ensuring that the Agency's SMS is effectively implemented throughout the Agency's public transportation system. The **Community Services Director** is accountable for ensuring action is taken, as necessary, to address substandard performance in the Agency's SMS. The **Community Services Director** may delegate specific responsibilities, but the ultimate accountability for the City of Corona Transit Service's safety performance cannot be delegated and always rests with the **Community Services Director**. The **Community Services Director** is accountable for ensuring that the Agency's SMS is effectively implemented, and that action is taken, as necessary, to address substandard performance in the Agency's SMS. The Accountable Executive may delegate specific responsibilities, but not accountability for City of Corona Transit Service's safety performance.

The **Community Services Director** roles include, but are not limited to:

- Decision-making about resources (e.g. people and funds) to support asset management, SMS activities, and capital investments;
- Signing SMS implementation planning documents;
- Endorsing SMS implementation team membership; and

- Ensuring safety concerns are considered and addressed in the agency’s ongoing budget planning process.
- Ensuring transparency in safety priorities: for the Board of Directors and for the employees.
- Establishing guidance on the level of safety risk acceptable to the agency.
- Assuring safety policy is appropriately communicated throughout the agency.
- Other duties as assigned/necessary.

Subsection 5.4.2 Chief Safety Officer

The Chief Safety Officer has the authority and responsibility for day-to-day implementation and operation of the City of Corona Transit Service’s SMS.

Chief Safety Officer’s Roles include:

- Decision-making about resources (e.g., people and funds) to support asset management, SMS activities, and capital investments;
- Overseeing the safety risk management program by facilitating hazard identification, safety risk assessment, and the development and implementation of safety risk mitigations.
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and Corona City Council on SMS implementation progress;
- Planning safety management training; and
- Developing and organizing annual audits/reviews of SMS processes and the Agency Safety Plan to ensure compliance with 49 CFR Part 673 requirements.
- Maintaining safety documentation.
- Other duties as assigned/necessary.

Subsection 5.4.3 Agency Leadership and Executive Management

The **Chief Operations Officer and the department directors or managers of each department** comprise Agency Leadership/Executive Management. Some of their responsibilities include:

- Day-to-day implementation of the Agency’s SMS throughout their department and the organization.
- Communicating safety accountability and responsibility from the frontline employees to the top of the organization.
- Ensuring employees are following their working rules and procedures, safety rules and regulations in performing their jobs, and their specific roles and responsibilities in the implementation of this Agency Safety Plan and the Agency’s SMS.
- Ensuring that employees comply with the safety reporting program and are reporting unsafe conditions and hazards to their department management; and making sure reported unsafe conditions and hazards are addressed in a timely manner.
- Ensuring that resources are sufficient to carry out employee training/certification and re-training as required by their job classifications.

Subsection 5.4.4 Key Staff

The agency Key Staff/Employees may include managers, supervisors, specialists, analysts, database administrators, and other key employees who are performing highly technical work and overseeing employees performing critical tasks and providing support in the implementation of this Agency Safety Plan and SMS principles in various departments throughout the agency.

City of Corona Transit Service's Key Staff/Employees responsibilities include:

- Ensuring that employees are complying with the safety reporting program.
- Ensuring supervisors are conducting their toolbox safety meetings
- Promoting safety in employee's respective area of responsibilities – That means: zero accidents; absence of any safety concerns; perfect employee performance; and compliance with agency rules and procedures and regulatory requirements.
- Ensuring safety of passengers, employees, and the public.
- Responding to customer complaints and expectations for frequency, reliability, and convenience of service.
- Replacing and maintaining aging facilities, equipment, and infrastructure.
- Meeting increasing demands for fixed route, commuter service and paratransit service.
- Developing and maintaining programs to gather pertinent data elements to develop safety performance reports and conduct useful statistical analyses to identify trends and system performance targets.
- Establishing clear lines of safety communication and holding accountability for safety performance.
- Assisting as subject matter experts in safety risk assessment and safety risk mitigation processes.

Section 6 Safety Risk Management (SRM)

The second component of the City of Corona Transit Service's SMS is Safety Risk Management, which includes processes and procedures to provide an understanding of the Agency's operations and vehicle maintenance to allow individuals to identify hazards associated with those activities.

City of Corona Transit Service has implemented a Safety Risk Management process for all elements of its transportation system. The Safety Risk Management process includes the following activities: safety hazard identification, safety risk assessment, and safety risk mitigation.

Subsection 6.1 Safety Hazard Identification

Hazard identification is the first step in the Safety Risk Management process and a key component. It involves these fundamental safety-related activities: Identifying safety hazards and their consequences; assessing the risks associated with the consequences of the hazards; and developing mitigations to reduce the potential consequences of the identified hazards.

The following is **City of Corona Transit Service'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 the FTA. Hazards are identified through a variety of sources, including:

- Employee safety reporting,
- Review of vehicle camera footage,

- Review of monthly performance data and safety performance targets,
- Observations from supervisors,
- Maintenance reports,
- Comments from customers, passengers, and third parties,
- Safety committee, driver and all-staff meetings,
- Results of audits and inspections of vehicles and facilities,
- Results of training assessments
- Investigations into safety events, incidents and occurrences, and
- Information from FTA and oversight authorities.

When a hazard has been identified, whatever the source, it is reported to the City of Corona Transit Service Chief Safety Officer, who enters it into the Hazard Log. The Chief Safety Officer also may enter hazards into this log based on reviews of operations and maintenance activities and procedures.

The Chief Safety Officer will investigate hazards to collect information and determine if hazards need to be entered into the safety risk assessment process. In following up on identified hazards, the Chief Safety Officer may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard,
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary,
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard,
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.),
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard,
- Review any past reported hazards of a similar nature, and
- Evaluate tasks and/or processes associated with the reported hazard.

Any identified hazard that poses an immediate risk to transit operations, the health and safety of employees or the public, or equipment must immediately be brought to the attention of the Accountable Executive and placed through the Safety Risk Management process for safety risk assessment and mitigation. Otherwise, hazards will be prioritized for further Safety Risk Management activity.

Subsection 6.2 Infectious Disease Prevention

CCTS follows the Center for Disease Control (CDC) guidelines for all infectious disease exposures. CCTS will also monitor the Riverside County Office of Public Health and California Occupational Safety and Health Administration (OSHA) guidelines and maintain the highest level of employee safety. In addition, the City has developed and implemented the COVID-19 Prevention Program which is designed to control employees' exposure to COVID-19 that may occur in the workplace. These document can be found on the City's intranet and in the appendix of this plan. Further, the City's transit operations contractor, MV Transportation, has updated its

Injury and Illness Prevention Program to include COVID-19 Health and Safety Preparedness. This document is also included in the appendix.

Subsection 6.3 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.

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

Severity Levels		
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.

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.

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.

Subsection 6.4 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 City of Corona Transit Service 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.

Section 7 Safety Assurance

The third component of the Agency’s SMS is Safety Assurance, which ensures the performance and effectiveness of safety risk controls established under safety risk management. Safety assurance also helps ensure that the organization meets or exceeds its safety objectives through the collection, analysis, and assessment of data regarding the organization's performance. Safety assurance includes inspection activities to support oversight and performance monitoring.

The City of Corona Transit Service monitors its operations and maintenance protocols and procedures, and any safety risk mitigations to ensure that it is implementing them as planned. Furthermore, the Agency investigates safety events (as defined in CCTS’ SMS pg. 12) and any reports of non-compliance with applicable regulations, standards, and legal authority. Finally, the Agency continually monitors information reported to it through any internal safety reporting programs, including the employee safety reporting program.

Some of the key elements of City of Corona Transit Service’s Safety Performance Monitoring and Measurement are shown below in subsection 7.1:

Subsection 7.1 Safety Performance Monitoring and Measurement

As part of the Safety Assurance Process, **City of Corona Transit Service:**

- Monitors the system for compliance with, and sufficiency of, the Agency’s procedures for operations and maintenance through:
 - Safety audits,
 - Informal inspections,
 - Regular review of on-board camera footage to assess drivers and specific incidents,
 - Safety surveys,
 - Employee safety reporting program,
 - Investigation of safety occurrences,
 - Safety review prior to the launch or modification of any facet of service,
 - Daily data gathering and monitoring of data relating to the delivery of service,
 - Regular vehicle inspections and preventative maintenance, and
 - Continuous feedback loop between leadership and all levels of the agency.
- Monitors its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended through:
 - Reviewing results from accident, incident, and occurrence investigations,
 - Monitoring employee safety reporting,
 - Reviewing results of internal safety audits and inspections, and

- Analyzing operational and safety data to identify emerging safety concerns.
- Conducts investigations of safety events to identify causal factors; and
- Monitors information reported through any internal safety reporting programs.
 - The Chief Safety Officer routinely reviews safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer ensures that the issues and concerns are investigated or analyzed through the safety risk assessment process.
 - The Chief Safety Officer also reviews the results of internal and external reviews, including audits and assessments, with findings affecting safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations. The Chief Safety Officer discusses relevant safety issues and concerns with the Accountable Executive and executive management and documents the results of these reviews in the Hazard Log.

In the event of a fatality, the **City of Corona Transit Service** 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](#) . The **City of Corona Transit Service** requires driver notification to the **City of Corona Transit Service** immediately and maintains records of any report filed pursuant to this paragraph.

Section 8 Safety Promotion

The fourth component of the Agency’s SMS is Safety Promotion, which includes a combination of training and communication of safety information to employees to enhance the Agency’s safety performance. Safety Promotion sets the tone for the SMS and helps City of Corona Transit Service to establish and maintain a robust safety culture. Safety Promotion has two-components: (1) Safety Communication; and (2) Competencies and Training.

Subsection 8.1 Safety Communication

City of Corona Transit Service 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 City of Corona Transit Service 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. City of Corona Transit Service's tools to support safety communication include:

- Safety bulletins
- Safety notices
- Posters
- CDs or Thumb drives or online safety video access
- Newsletters
- Briefings or Toolbox talks
- Seminars and workshops
- New employee training and refresher training
- Intranet or social media
- Safety Committee Meetings

Competencies and Training: Executive Management ensures that all employees attend the training provided to understand their specific roles and responsibilities for the implementation of SMS. City of Corona Transit Service provides SMS training in the following areas:

All Employees:

- Understanding of Safety Performance Targets
- Understanding of fundamental principles of SMS
- Understanding of Safety Reporting Program – Reporting unsafe conditions and hazards/near misses
- Understanding of their individual roles and responsibilities under SMS

Managers and Supervisors

- Understanding of Safety Risk Management
- Understanding of Safety Assurance
- Understanding of Safety Promotion
- Understanding of their individual roles and responsibilities for SMS

Executive Management:

- Understanding of management commitment to and support of all SMS activities.

All employees are required to acquire the competencies and knowledge for the consistent application of their skills as they relate to safety performance objectives. City of Corona Transit Service dedicates resources to conduct effective safety-related skill training. The scope of the

safety training is appropriate to each employee’s individual safety-related job responsibilities and their role in SMS. Components of City of Corona Transit Service’s skill-related training include:

- Conducting training needs analyses to ensure that the right information is being taught to the right employees using the most efficient training methods.
- Communicating purpose, objectives, and outcome.
- Ensuring relevant content by directly linking training to the trainee’s job experiences so trainees are more motivated to learn.
- Using active hands-on demonstrations and practice to demonstrate skills that are being taught and provide opportunities for trainees to practice skills.
- Providing regular feedback during hands-on practice and exercises.
- Reinforcing training concepts in the post-training work environment by giving employees opportunities to perform what they’ve learned.

Safety-related skill training programs provided by the transit agency, per “4.1 Competencies & Training” in MV Transportation’s “Safety Management System Plan 2019”

City of Corona Transit Service conducts refresher training **monthly**, during employee safety meetings.

Section 9 Documentation

Pursuant to 49 CFR Part 673.31, City of Corona Transit Service maintains records related to this Safety Plan and SMS implementation for a minimum of three years. These documents include but are not limited to the results from SMS processes and activities. City of Corona Transit Service will make these documents available to FTA Region 9, Caltrans, and other Federal and state agencies upon request.

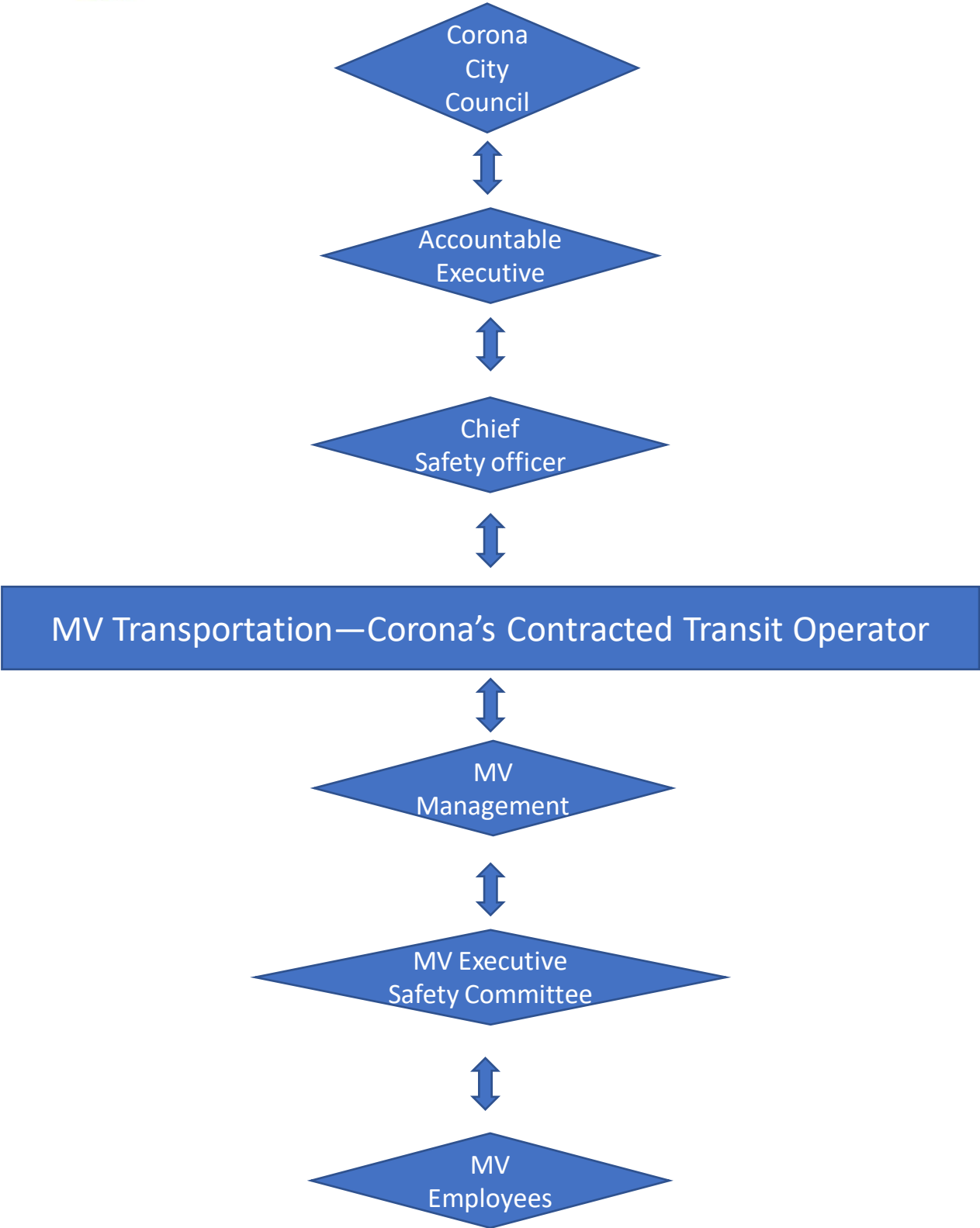
Attachments

Attachment A – Organization Chart

Attachment B – Board Approval



City of Corona Agency Safety Plan Organization Chart



Addendum – City of Corona Transit Service Safety Management System

2022

City of Corona Transit Service Safety Management System



Sudesh Paul

City of Corona Transit Service

12/7/2022



MISSION/OBJECTIVE

The City of Corona Transit Service (CCTS) is committed to operating a public transportation system that offers reliable, accessible, and convenient service with safe vehicles and facilities. CCTS overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent to eliminate unacceptable safety risk in our transit operations.

ABOUT CITY OF CORONA TRANSIT SERVICE (CCTS)

City of Corona Transit Service (CCTS) provides both fixed route, Corona Cruiser, and Dial-A-Ride (DAR) services. CCTS serves a diverse population of over 168,000 residents. The city limits encompass approximately 39 square miles.

Dial-A-Ride service commenced in 1977 and provides curb-to-curb service throughout the City of Corona, neighboring county areas of Coronita, El Cerrito, Home Gardens, and satellite locations in the City of Norco. The complementary paratransit service DAR service extends beyond city limits to ensure compliance with the Americans with Disability Act (ADA) ¾ mile corridor around Corona Cruiser fixed route service. Door-to-door service is available upon request for DAR patrons certified under the ADA. The Corona Cruiser fixed route service commenced in 2001 and operates along two routes, the Red Line and Blue Line, using five buses during peak service. The routes provide access to commercial, retail and residential areas, medical facilities, schools, jobs, and links to other transit services. CCTS contracts with the private sector to provide a turn-key transit operation

Version 3, 11/29/22

The Federal Transit Administration (FTA) has issued rules that require public transit agencies to draft a Safety Plan in accordance with 49 C.F.R. Part 673 (Part 673). The full text of the Part 673 is available at <http://www.transit.dot.gov/PTASP>



City of Corona Transit Service Information

Transit Agency Name	City of Corona Transit Service		
Transit Agency Address	400 S. Vicentia Avenue, Suite 225, Corona, CA 92882		
Name and Title of Accountable Executive	Anne K. Turner, Community Service Director		
Name of Chief Safety Officer or SMS Executive	Sudesh Paul, Transit Program Manager		
Mode(s) of Service Covered by the Plan	Fixed Route Demand Response	List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5339
Modes(s) of Service Provided by the Transit Agency	Contract Operated Fixed Route Contract Operated Demand Response		

Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	City of Corona Transit Service	
Signature by the Accountable Executive		
	Signature of Accountable	Date of Signature
Approval by the Board of Directors or an Equivalent Authority	City Council	
	Name of Entity That Approved this Plan	Date of Approval

Revision/Update History



City of Corona Transit Service Safety Management System (SMS)

Agency Name:

City of Corona Transit Service

FTA Recipient ID:

1638

Accountable Executive:

Anne K. Turner, Community Services Director

Initial City of Corona Council Adoption:

April 15, 2020

SMS Effective Date

July 31, 2020

Last Modified By (Name):	Last Modified (Date):
Gerardo Sanabria	06/15/2020
Sudesh Paul	12/7/2022



Introduction

On July 19, 2018, The Federal Transit Administration (FTA) published the Public Transportation Agency Safety Plan (PTASP) Final Rule, which requires certain operators of public transportation systems that receive federal funds under FTA's Urbanized Area Formula Grants to develop safety plans that include the processes and procedures to implement Safety Management Systems (SMS). The documented processes and procedures for the Agency's SMS must consist of four main elements: (1) Safety Management Policy, (2) Safety Risk Management, (3) Safety Assurance, and (4) Safety Promotion.

In the case of conflict between Corona's Agency Safety Plan and Corona's Safety Management System that includes its Transit Operations Contractor's Safety Management System Plan (MV Transportation "Safety Management System Plan 2019"), Corona's Agency Safety Plan and SMS shall take precedence over, and shall be used in lieu of, such conflicting provisions. Corona's Safety Management System including those of its Contracted Transit Operator have been arranged into a format that parallels the Public Transportation Agency Safety Plan (PTASP) Final Rule.



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I. Safety Management Policy

The first component of the City of Corona Transit Service’s SMS is the Safety Management Policy, which is the foundation of the City of Corona Transit Service’s safety management system. It clearly states the organization’s safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. The Safety Management Policy clearly defines management and employee responsibilities for safety throughout the organization. It also ensures that management is actively engaged in the oversight of the system’s safety performance by requiring regular review of the Safety Management Policy, budget and program by the designated Accountable Executive.

Safety Management Policy Statement

Safety is a core value at City of Corona Transit Service, and managing safety is a core business function. City of Corona Transit Service will develop, implement, maintain, and continuously improve processes to ensure the safety of our customers, employees, and the public. City of Corona Transit Service overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent to eliminate unacceptable safety risk in our transit operations.

City of Corona Transit Service will:

- Clearly, and continuously explain to all staff that everyone working within City of Corona Transit Service must take part and be responsible and accountable for the development and operation of the Safety Management System (SMS).
- Work continuously to minimize safety risks. Work to comply with and, wherever possible, exceed legislative and regulatory requirements and standards for passengers and employees.
- Work to ensure that all employees are provided appropriate safety information and training, are competent in safety matters, and assigned tasks commensurate with duties and skills.
- Reaffirm that responsibility for making our operations safer for everyone lies with all employees – from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established through the SMS.



Purpose

The City of Corona Transit Service (CCTS) recognizes Safety as its number one core pillar. Every employee is accountable for making safety their priority, starting with the Accountable Executive. Safety and regulatory compliance are the first consideration when developing and implementing policies, procedures and programs affecting the Agency's operation.

Policy

CCTS will continue to support the ongoing implementation of its Safety Management System (SMS) with a commitment to the provision of appropriate resources. The Agency's policies, rules and regulations will continue to be developed with the intent to integrate safety into all Agency operations. Every employee should understand the importance of safety in the workplace.

CCTS establishes and measures our safety performance against realistic and data-driven performance indicators and targets. Monthly safety and security inspections of CCTS transit facilities are conducted to identify and correct potential hazards. Our safety culture encourages employees to freely and openly report safety related issues or concerns.

CCTS ensures no action is taken against any employee who discloses a safety matter through the employee safety reporting program, unless disclosure reveals beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures. CCTS and its Contracted Operator will further ensure that every action is taken within reason to mitigate or eliminate potential hazards from the workplace.

The Agency's Safety Committee, represented by Corona Transit management from multiple disciplines, meets monthly to discuss the safety of its employees and customers. The Committee seeks to proactively identify and mitigate any risk of workplace injury and illness. Employees are provided an opportunity for the free discussion of health and safety problems and possible solutions through their representatives on the committee. Additionally, safety suggestion forms and drop boxes are available to employees as part of the safety reporting program.

In the Agency's quest for safety excellence, it has implemented a Safety Management System (SMS) to identify and mitigate risk. This includes the constant evaluation of the effectiveness of these efforts. This cycle of continuous improvement is a part of the culture at CCTS. Realistic safety performance targets are set prior to the start of each fiscal year and are measured no less than quarterly against benchmarks to evaluate the effectiveness of and adjust as necessary to the continuous efforts to mitigate safety related exposures.

To ensure externally supplied systems and services supporting our operations are delivered and meet our safety performance standards, CCTS screens all potential contractors or vendors to ensure compliance with regulatory guidelines.

Safety at the highest level is achieved through cooperative proactivity in identifying potential hazards and taking into consideration the safety of others. Management will review the safety plan annually and update it as appropriate to ensure the safety of our employees and customers.



As a Public Transit Agency, we understand our responsibility to the safety of our employees, customers, and the public. Our decisions and actions affect the safety of our community and we commit to continually improve on safety.

Reporting Unsafe Conditions

It is the responsibility of every employee to be aware of their surroundings and to report any unsafe or unsecure condition to their supervisor, safety committee representative, or via the safety suggestion boxes. The Agency has established a program through which employees can identify and make suggestions relating to safety issues. All suggestions or issues identified are addressed monthly at the Agency’s Safety Committee meetings.

Safety Management Policy Communication

CCTS safety management policy is communicated throughout the agency’s organization. Include dates where applicable

The Safety Management Policy is initially communicated to employees in the new employee orientation. Additionally, every operator is given annual instruction which includes the Agency’s safety policy, and a review of how it relates to their safe operation of Agency vehicles. Maintenance employees are communicated the Agency’s Safety Policy once per month during regularly scheduled safety meetings. The Safety Committee addresses the Agency’s Safety Policy with Administrative employees at the monthly Safety Committee Meeting, and the representatives take the information back to department staff meetings.

The Safety Management Policy is reinforced using “Driver TV,” which plays continuous loops of safety policy communications that are updated each month with information geared toward relevant current trends.

The Agency maintains a Monthly Safety Campaign program for all operators and maintenance personnel. Material for the monthly campaigns cover mandated training topics such as Heat Illness Prevention and Bloodborne Pathogens, but a review of recent trends in safety events within the system also help tailor the monthly campaigns in effort to meet Safety Performance Targets.

Safety Accountabilities and Responsibilities

Authorities, Accountabilities, and Responsibilities	
<i>Describe the authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency’s Safety Management System (SMS).</i>	
Accountable Executive	Anne K. Turner, Community Services Director
Authority/Accountability	The APWD/CE has ultimate accountability to ensure the proper development and implementation of Agency’s Safety Plan. The APWD/CE has the authority to designate the appropriate funding for necessary safety related items.
Chief Safety Officer or SMS Executive	Sudesh Paul, Transit Program Manager



<p>Responsibility/Authority</p>	<p>The Transit Program Manager has the responsibility to develop and ensure implementation throughout the Agency and has the authority to implement safety mitigating measures and recommendations.</p>
<p>Agency Leadership and Executive Management</p> <p>Responsibility/Authority</p>	<p>Anne K. Turner, Community Services Director; Cynthia Lara, Community Assistance Manager; Sudesh Paul, Chief Safety Officer or SMS Executive; Sudesh Paul, Transit Program Manager</p> <p>The entire leadership team has the responsibility to model, encourage and enforce behaviors that are consistent with the Agency’s number one core value, Safety. They are vested with the authority to carry out this task and are to ensure that Safety is always primary in any decisions about Agency business.</p>
<p>MV Transportation Agency Contractor Operator Leadership and Executive Management</p> <p>Responsibility/Authority</p>	<p>Catherine Wynne, General Manager; Britney Pimentel Assistant General Manager; Alex Sierra, Maintenance Manager, George Mbulo Jr., Director of Safety (Southern CA); Veronica Ramirez, Road Supervisor.</p> <p>The entire MV Transportation leadership team has the responsibility to model, encourage and enforce behaviors that are consistent with the Agency’s number one core value, Safety. They are vested with the authority to carry out this task and are to ensure that Safety is always primary in any decisions about Agency business.</p>
<p>MV Transportation Key Staff</p>	<p>General Manager: Ultimate responsibility for the safety performance of the location and authorizes activities to support an effective SMS. Assistant General Manager (Britney Pimentel): Responsible for promoting operational safety and adhering to our policies and procedures. Safety and Training Manager (Catherine Wynne): Responsible for the day-to-day implementation and operation of the SMS. Maintenance Manager: Responsible for OSHA compliance and site-specific maintenance activities. Trainers / Instructors (George Mbulo Jr., Alex Sierra, Catherine Wynne): Responsible for ensuring that we are training every employee to proficiency in accordance with our performance standards. Supervisors (Veronica Ramirez): Responsible for playing an active role in SMS activities, including sufficient road observations and identifying potential safety hazards with recommended solutions. Location Safety Committee (the committee is composed of MV Transportation and Corona staff, refer to Safety Committee attachment): Responsible for ensuring that reported safety items</p>



	are reviewed and addressed, as well as discussing proactive measures to mitigate future risk.
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Employee Safety Reporting Program

Vehicle Safety Defects Reporting

Coach operators complete pre-trip vehicle inspections prior to pulling from the yard and during relief, using an approved California Highway Patrol inspection form to report safety or mechanical defects. The completed form is turned into dispatch upon pulling the bus back into the yard. Completed forms are collected periodically throughout the day by maintenance staff and repairs are then made if necessary. If a safety or mechanical defect is reported to dispatch prior to pull out, a mechanic will inspect the defect and determine if the coach is safe for operation. If determined the bus is unsafe, it will be placed on hold and will not be released to operations until the necessary repairs are completed and signed off by the mechanic. If a safety or mechanical defect is reported while in service, dispatch will confer with a maintenance supervisor to determine the next course of action i.e. bus exchange, maintenance road call, or safe to continue operation.

On-Route Safety Issue Reporting Procedures

All events, incidents or accidents are reported by the operator or reporting staff to dispatch via Clever Device, two-way Bolt radio communication, or cell phone. Dispatch will advise the operator what report must be completed and/or refer the issue to the operations manager if necessary. If an incident or accident occurs, the operator or reporting staff will complete the appropriate report and turn it in to dispatch. Dispatch will then place the report in the Risk Management’s mailbox for review. For accidents, if Risk Management determines it was a preventable accident, they will forward their findings to the training manager who will then schedule the employee for retraining. For incidents, Risk Management will determine if there is certain behavior by the employee that caused the incident to take place, they will report their finding in an observation report to the operations manager who then will determine if retraining and/or discipline will take place. If the accident or incident was not the fault of the employee, Risk Management will attempt to mitigate the hazard utilizing CCTS’ hazard identification and resolution process that is detailed starting on p. 10.

Employee Behaviors/Retraining Procedures

If the operator or staff has accountability relating to an incident or accident, a retraining form is completed, and the employee is retrained via on the road and/or a verbal/written coaching by either a training instructor or operations supervisor. All retraining documentation is signed by the employee and supervisor/training instructor and filed in the employees personnel file and in Oracle software. Any operator behavior determined to be “at-risk” results in retraining. Any operator behavior determined to be reckless could result in punitive/disciplinary measures.



Other Employee Safety Reporting Procedures

CCTS' safety culture encourages employees to report safety related issues or concerns. In addition to the vehicle safety defect reports, incident reports, and accident reports, safety suggestion boxes are in employee break and lounge areas and checked frequently. All employees are encouraged to utilize these boxes and may do so anonymously. All employee concerns/suggestions are addressed and communicated back to the employee submitting the suggestion/concern.

All Agency functional areas are represented on the Agency Safety Committee. The Committee meets each quarter, and employees are encouraged to bring forward any safety related concerns. The meeting is concluded with a "round-table" open forum discussion to ensure each member has an opportunity to contribute.

CCTS/MV Transportation ensures no action is taken against any employee who discloses a safety matter through the employee safety reporting program, unless disclosure reveals beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

II. Safety Risk Management

Safety Risk Management Process

Describe the Safety Risk Management process, including:

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards.*
- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards.*

Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment.

Monthly Facility Inspections

Inspections of CCTS facilities are conducted on a regular basis, no less than monthly. The Corona/MV Transportation staff conducts regular facility inspections to identify any potential safety hazards/risks and coordinates the abatement of such items with Facilities and/or Maintenance.

Reporting

All operations and maintenance personnel are required to submit a report after the occurrence of any safety event. The reports are submitted to the Risk Management Department for processing. This processing includes review of the report, classification of the incident/accident type, documentation of the event in the Agency's Accident/Incident database, and investigation/recovery of additional evidence (including audio and video).



Training

Through regular annual training, employees are encouraged to report any observed/identified conditions throughout the Agency's service area to the Risk Management Department by way of the Safety Suggestions Boxes or their Safety Committee representatives.

All safety events are reviewed by the Risk Manager. When an event is rated as preventable, a notice is issued to the operator advising them of the preventable rating. The operator is given the option of having the rating determination reviewed by an Accident Review Board Panel.

A copy of the notice is sent to the Training Manager, who immediately schedules a mandatory re-training with the operator. This re-training is carried out regardless of the outcome of any review, if requested by the operator

Assessment

Regular assessments are conducted in conjunction with the Transportation Security Administration, Department of Homeland Security to review potential risks, Agency policies and procedures, as well as the physical security of the Agency's facilities. Action items are created, and coordination with the appropriate department management personnel is initiated by the Transit Safety and Security Manager to ensure follow up and completion of such items to correct deficiencies.

Quarterly Accident Reviews

A quarterly review is conducted of safety events. A committee made up of staff from Operations, Risk Management and Training review all safety events for the previous quarter to determine what mitigating measures may be implemented to prevent reoccurrence of similar events.

These reviews include analysis of accidents by type, location (using geo mapping), frequency and severity. Additionally, the data may be broken down by seniority (or other demographic information) to determine if there are any identifiable patterns are occurring.

Hazard Management Process

A hazard is any real or potential condition that can cause injury, illness, or death; damage to or loss of a system, equipment, or property; or damage to the environment. CCTS's hazard identification and resolution process has been implemented to ensure potential hazards are systematically identified, evaluated, and resolved during design, construction, and revenue operations. Through this process, CCTS seeks to minimize and eliminate injuries to passengers, employees, and the general public, and to prevent service delays and damage to property, equipment, and the environment.

Purpose

This section outlines CCTS/MV Transportation formal process used to identify, evaluate, and mitigate potential hazards associated with transit operations and maintenance. Hazards identified are analyzed for potential impact and resolved by design, procedure, warning device,



or other method so that identified hazards are at a point that is As Low as Reasonably Practicable (ALARP).

Hazard Management Consists of:

- Hazard identification
- Hazard investigation, evaluation, and analysis
- Hazard mitigation, control, and elimination
- Hazard tracking

Hazard Identification

The physical and functional characteristics of the system to be analyzed are CCTS operations, maintenance, facilities, procedures, employee practices, and general contract oversight.

Knowledge of how the individual system elements interface with each other is essential to the hazard identification effort. Hazards may be identified through:

- Daily tasks and routine activities conducted by CCTS staff and contractors
- Inspections and observations conducted by CCTS Risk Management
- Internal audits and records reviews
- External audits conducted by regulatory agencies
- Design reviews where representatives of Safety and Security as well as Operations Divisions participate
- Hazard analyses and special reports prepared by consultants, CCTS employees, contractors, and suppliers
- Hazards that develop as a result of accidents/incidents
- Information from other transit systems

Employee Hazard Reporting

CCTS has provided a Safety/Security Hazard form that is available in paper form at CCTS facilities. This form may be used by all employees and contractors to report hazards throughout the system. Once an employee/contractor submits the form, a supervisor/manager must enter that information into the CCTS Safety database and determine a risk assessment using the predetermined hazard assessment table. Once the hazard has been assigned a risk level, a corrective action must be assigned to all hazards and resolution achieved, prior to any close out. CCTS' Transit Transportation Planning Supervisor is ultimately responsible for ensuring all corrective actions are addressed and closed out in a timely fashion. If the hazard requires additional resources beyond those assigned responsibility, the Transit Safety and Security Manager may assign the hazard to the applicable Risk Register.

Infectious Disease Prevention

CCTS follows the Center for Disease Control (CDC) guidelines for all infectious disease exposures. CCTS will also monitor the Riverside County Office of Public Health and California Occupational Safety and Health Administration (OSHA) guidelines and maintain the highest level of employee



safety. In addition, the City has developed and implemented the COVID-19 Prevention Program which is designed to control employees' exposure to COVID-19 that may occur in the workplace. These document can be found on the City's intranet and in the appendix of this plan. Further, the City's transit operations contractor, MV Transportation, has updated its Injury and Illness Prevention Program to include COVID-19 Health and Safety Preparedness. This document is also included in the appendix.

III. Safety Assurance

Safety Performance Monitoring and Measurement

Describe activities to monitor the system for compliance with procedures for operations and maintenance.

Reporting

All operations and maintenance personnel are required to submit a report after the occurrence of any safety event. The reports are submitted to the Risk Management Department for processing. This processing includes review of the report, as well as video from the bus or facilities cameras to determine compliance with procedures for operations and maintenance. If non-compliance is observed, an observation report is completed and forwarded to the Surveillance Specialist (SS-Road Supervisor collect video, General manager/Assistant GM will review). The SS will open a disciplinary case by assigning an Occurrence Number to track the matter through to conclusion.

Investigations

Any collision, and all accidents involving property damage or injury to person is immediately investigated by an Operations and/or Road Supervisor. Analysis to determine the root cause of the event is conducted, as well as a review of any procedures or policies for which violations of may have contributed to the event. This information is tracked in the Accident/Incident database and reviewed on a quarterly basis to determine if mitigations implemented have been effective in meeting benchmarks as outlined in the Management of Change section below under "Quarterly Reviews."

Safety Information Monitoring

A quarterly review is conducted of safety events. A committee made up of staff from Operations, Risk Management and Training review all safety events for the previous quarter to determine what mitigating measures may be implemented to prevent reoccurrence of similar events.

These reviews include analysis of accidents by type, location (using geo mapping), frequency and severity. Additionally, the data is broken down by seniority to determine if events are occurring among less senior operators more frequently or more severely to assess whether training or experience are factors in the events.



Proactive Observations and Evaluations

The Agency deploys 3 types of Proactive Observations/Evaluations:

1) *Coach Operator Performance Profile*

The Agency performs an annual performance evaluation of every coach operator. The document records (see attached Coach Operator Performance Evaluation Form) an operator's safety record, compliance to rules and regulations and attendance. An Operations Supervisor meets with the Coach Operator and goes over their record for the year and gives them recommendations for improvement, if necessary.

2) *On-Board Observation*

The Agency deploys trained on-board evaluators (secret shoppers) to perform an in-person observation of each operator at least once a year. The on-board evaluators ride a minimum of 20 minutes and observe for core skills as a basis for their evaluation. If any deficiencies are observed the coach operator is coached/counseled/retrained as necessary.

3) *External Observation*

The Agency performs an annual field observation for every coach operator. An Operations Supervisor follows the bus in a supervisor vehicle and observes for core skills as a basis for evaluation. If any deficiencies are observed the coach operator is coached/counseled/retrained as necessary.

Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

Safety Inspections

Regular routine inspections are also conducted by the Agency's contracted bus operators on a daily basis, pre-trip and post-trip inspections. Any concerns, hazards or risks are reported in the Daily Vehicle Inspection Report, immediate concerns are communicated to Dispatch, Maintenance, Management Staff, such issues are documented in the Dispatch Log, and Maintenance Log.

Monthly Facility Inspections

Inspections of CCTS transit operating facilities are conducted on a regular basis, no less than monthly. The Transit General Manager conducts regular facilities and revenue vehicle inspections to identify any potential safety hazards/risks and coordinates the abatement of such items with Facilities and/or Maintenance—see Form "GM Monthly Facility Safety Audit FormREV".

Quarterly Reviews

A quarterly review is conducted of safety events. A committee made up of staff from Operations, Risk Management and Training review all safety events for the previous quarter to determine if



recommended mitigations were effective in meeting safety performance targets or were not implemented as intended.

Describe activities to conduct investigations of safety events to identify causal factors.

Root Cause Analysis

Any collision, and all accidents involving property damage or injury to person is immediately investigated by an Operations and/or Road Supervisor. Analysis to determine the root cause of the event is conducted, as well as a review of any procedures or policies for which violations of may have contributed to the event. This information is included in the Risk Management report processing.

Describe activities to monitor information reported through internal safety reporting programs.

Hazard Investigation, Evaluation, and Analysis

Employees are encouraged to immediately address hazards that may be easily resolved, such as a trip hazard that may be easily moved. Hazards that require more extensive measures for resolution should be elevated to managers or safety committees for corrective action. Managers and safety committees are encouraged to conduct appropriate investigations to determine the potential risk as evaluated through examining the severity and probability of the hazard.

Hazard severity is the measure of the consequence the hazard presents. The greater the potential hazard consequence, the more severe the hazard. Below is a chart describing the Hazard Severity Categories:

Hazard Severity Categories

CATEGORY NAME	LEVEL	CHARACTERISTICS
Catastrophic	1	Fatality or multiple severe injuries, severe environmental damage, total system loss, extreme financial loss to CCTS
Critical	2	Severe injury or occupational illness, significant environmental, system or equipment damage, major service disruptions, significant financial loss to CCTS
Marginal	3	Minor injury or occupational illness, minor environmental, system, or equipment damage, minor service disruption
Negligible	4	Less than minor injury or occupational illness, less than minor environmental, system or equipment damage. Insignificant service disruption.



The probability that a consequence associated with a given hazard will occur can be described in potential occurrences per unit of time, events, population items or activity. The hazard consequence occurrence probability, or frequency of occurrence, represents a qualitative judgment of the relative likelihood of occurrence of an accident caused by an uncorrected or uncontrolled hazard as a result of a particular event or series of events. All identified hazards are assigned one of five probability levels, as provided in the Hazard Frequency Categories chart below:

Hazard Frequency Categories

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 may 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.

A qualitative hazard probability will be derived from research, analysis, and evaluation of safety data from the operating experience of CCTS or other similar transit agencies. The term fleet or inventory in the table refers to the number of units or size of system elements as an aggregate in the CCTS system (e.g., the number of bus stops, collectively). Therefore, the table provides a qualitative probability category for a particular event occurring within the entire inventory of stops, or at a single stop, for example.

Risk assessment determines the acceptability of assuming a risk associated with a hazard, the necessity of implementing corrective measures to eliminate or reduce the hazard, or a combination of both. Hazard risk assessment involves categorization of hazard severity and probability of occurrence. The guidelines for determining hazard risk are presented in the tables below:

HAZARD SEVERITY CATEGORY	LEVEL
Catastrophic	1
Critical	2

HAZARD FREQUENCY CATEGORY	LEVEL
Highly Probable	A
Probable	B



City of Corona Transit Service Safety Management System (SMS)

Marginal	3
Negligible	4

Possible	C
Unlikely	D
Highly Unlikely	E
Eliminated	F

Hazard Assessment Table

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		

Unacceptable means the hazard cannot remain as is and must be mitigated.

Undesirable means that the hazard should be mitigated, if possible, within fiscal constraints.

Acceptable with review means that CCTS management must determine that the risk associated with the hazard is acceptable with proposed mitigations.

Acceptable without review means that the hazard can remain.

Regulatory Accident/Incident Reporting Thresholds

All accident and incident reporting must be completed by CCTS and its contractors. The following is a list of minimum regulations that must be met; however, it does not exempt CCTS or its contractors from meeting all the reporting requirements and is not all-inclusive:

- CFR, Title 49, Section 674 (FTA)
- General Order 164-E, Section 7 (CPUC)



Hazards and Corrective Actions Tracking

Hazards needing correction are entered and tracked in the CCTS Safety database. Corrective actions will have: 1) original finding information, 2) a suggested corrective action, 3) the responsible parties assigned, and 4) a due date identified. The CCTS safety data base is designed to provide notification of the corrective action to responsible parties as well as alert them of upcoming due dates and overdue corrective actions. Individuals assigning a corrective action and those responsible for the corrective action are expected to work together to effectively mitigate and/or eliminate the issue.

Hazards Communications and Reporting

CPUC Hazard Reporting Thresholds

Per the requirements of CPUC General Order 164-E Section 6 (e), CCTS shall report the following hazards to CPUC:

- Near miss industrial accident on CCTS property with potential for serious injury or fatality
- Any major hazardous material spill meeting the federal government’s reporting threshold

IV. Safety Promotion

Safety Performance Monitoring and Measurement

Describe activities to monitor the system for compliance with procedures for operations and maintenance.

Reporting

All operations and maintenance personnel are required to submit a report after the occurrence of any safety event. The reports are submitted to the Risk Management Department for processing. This processing includes review of the report, classification of the incident/accident type, documentation of the event in the Agency’s Accident/Incident database, and investigation/recovery of additional evidence (including audio and video).

Investigations

Any collision, and all accidents involving property damage or injury to persons are immediately investigated by an Operations or Maintenance Supervisor. Analysis to determine the root cause of the event is conducted, as well as a review of any procedures or policies for which violations of may have contributed to the event. This information is included in the Risk Management report processing and is accumulated for further analysis and discussion as outlined in the Management of Change section below.



Safety Information Monitoring

A quarterly review is conducted of safety events. A committee made up of staff from Operations, Risk Management and Training review all safety events for the previous quarter to determine what mitigating measures may be implemented to prevent reoccurrence of similar events.

These reviews include analysis of accidents by type, location (using geo mapping), frequency and severity. Additionally, the data is broken down by seniority to determine if events are occurring among less senior operators more frequently or more severely to assess whether training or experience are factors in the events.

Proactive Observations and Evaluations for Operator Safety Adherence

The Agency deploys 3 types of Proactive Observations/Evaluations:

1) Coach Operator Performance Profile

The Agency performs an annual performance evaluation of every coach operator. The document records (see attached Evaluation Master.pdf) reflect on the operator's safety record, compliance with rules and regulations and attendance. An Operations Supervisor meets with the Coach Operator and goes over their record for the year and gives them recommendations for improvement, if necessary.

2) On-Board Observation

The Agency deploys trained on-board evaluators (secret shoppers) to perform an in-person observation of each operator at least once a year. The on-board evaluators ride a minimum of 20 minutes and observe for core skills as a basis for their evaluation. If any deficiencies are observed the coach operator is coached/counseled/retrained as necessary.

3) External Observation

The Agency performs an annual field observation for every coach operator. An Operations Supervisor follows the bus in a supervisor vehicle and observes for core skills as a basis for evaluation. If any deficiencies are observed the coach operator is coached/counseled/retrained as necessary.

V. Management of Change (Not Required for Small Public Transportation Providers)

Describe the process for identifying and assessing changes that may introduce new hazards or impact safety performance.

CCTS and its contractor will evaluate and maintain a record of environmental, operational, and system changes as to adapt to the change or situation; and include any structural updates that would need to be documented within CCTS' SMS.



Configuration and Change Management

Configuration Management (CM) details the process used to make configuration changes to the transit system. Change management is the process and procedure used to manage significant operational changes that will have a direct impact on system safety.

CM refers to a discipline for evaluating, coordinating, approving or disapproving, and implementing changes in a transit system. The CM process ensures there is a process to document changes from the initial concept through development, implementation, and on-going evaluation of results.

Successful CM requires a well-defined and institutionalized set of policies and procedures to ensure that all CCTS Divisions as well as contractor staff that are affected by the configuration changes are formally notified and approve of the change.

Bus Operations and Transit Planning

The Operations (MV Transportation), Planning (Corona staff) are responsible for configuration management activities related to managing and documenting significant changes and/or modifications to CCTS' transportation system, and for verifying that new system elements and modifications in development are reviewed by key stakeholders at appropriate intervals for input and/or approval.

For these types of modifications to mission-critical equipment, facilities, infrastructure, and/or procedures, the Operations, Planning and Facilities divisions have accountability as follows:

Planning

- Evaluate routes based on customer requests, on-time performance, ridership data
- Create a service change guide and hold public meetings throughout the service area to gather feedback from key stakeholders
- Meet with appropriate stakeholders
- Present the service changes (including new, modified and cancelled routes) to Corona's Council as part of the yearly budget process
- Implement service changes as needed, unless a safety issue arises that warrants immediate action
- Issue documents regarding the service change to Contract Ops for review service change before each bid
- Monthly service meeting planning, maintenance, and operations
- Planning staff attends safety meetings for Contract Ops every month to gather feedback on changes, receive comments on current potential safety issues



- Planning staff attends Safety committee to discuss any safety concerns related to service planning
- Planning staff attends quarterly ADA meeting to gather feedback on service changes/ADA needs
- A comprehensive review is conducted, and approvals/signoffs are secured from key stakeholders before such changes are made
- Primary and secondary safety and functional impacts of a proposed change are identified, evaluated, and addressed early in a project's design phase
- The completed modifications are properly incorporated into the existing system

Operations

- Safety inspections of bus stop conditions and associated amenity during daily routine maintenance of bus stops (pad, bench, trash receptacle, shelter)
- Priority repair/service is scheduled for safety related items
- Annual refurbishment of bus stop amenities
- Keep up to date on the Agency's ADA policy
- Attend the Agency's safety committee meetings
- Review the Agency's accident & incident reports related to bus stops
- Maintain daily communications with internal & external stakeholders

VI. Continuous Improvement (Not Required for Small Public Transportation Providers)

Describe the process for assessing safety performance. Describe the process for developing and carrying out plans to address identified safety deficiencies.

Quarterly Accident Reviews

A quarterly review is conducted of safety events. A committee made up of staff from Operations, Risk Management and Training review all safety events for the previous quarter to determine what mitigating measures may be implemented to prevent reoccurrence of similar events.

These reviews include analysis of accidents by type, location (using geo mapping), frequency and severity. Additionally, the data is broken down by seniority to determine if events are occurring among less senior operators more frequently or more severely to assess whether training or experience are factors in the events.



Daily Reviews

All reports of safety events throughout the system are reviewed daily. Particular attention is directed to the identification of safety deficiencies. Whether the deficiencies are of an engineering or administrative nature, immediate action is taken to implement mitigating measures wherever and whenever appropriate.

When an engineering deficiency is identified, the Risk Management team works with the appropriate department to brainstorm and implement mitigating measures. Common examples of these types of deficiencies are overgrown trees interfering with proper service stops, etc.

When administrative deficiencies are identified, employee re-training is immediately scheduled and carried out. When deficiencies are of a significant nature, the operator may be removed from service until such time as the re-training has occurred.

VII. Program Implementation

Responsibility for the AGENCY SAFETY PLAN

The Transit Safety and Security Manager is responsible for the content, maintenance, and dissemination of this plan. The AGENCY SAFETY PLAN is a living document, available for review at all times to all CCTS employees and Contractors. Comments and revisions may be submitted to the Transit Safety and Security Manager for evaluation and inclusion in the next iteration of the plan. The signed copy of the current plan will be maintained in the Risk Management Department.

Continuous Plan Evaluation

During internal audit activities or the issuance of new regulations or recommended industry wide practices, Risk Management will continuously evaluate the relevancy and applicability of this AGENCY SAFETY PLAN.

All revisions will be noted in the revision record at the beginning of the document. If any revision requires a change in process, a notice will be disseminated to appropriate personnel explaining the 1) document change, 2) reason for change, 3) and its impact on any job functions. CCTS employees and Contractors will be notified of a substantially revised plan by an email or letter from CCTS' Transit Safety and Security Manager.

The revised plan will be disseminated by one or more of the following methods: delivered as a hard copy and/or emailed as a soft copy to each relevant operating entity, or available through request from Risk Management. Contractor employees will be required to sign a hard copy of the plan.

Strategic Communications and Coordination

CCTS maintains a Safety Communication Plan that is consistent with the requirements of SMS. The Safety Communications Plan supports the timely and effective notification and communication between CCTS and its key stakeholders that includes customers, contractors and



the general public. Communications and coordination between CCTS, the service contractors, other system users, and interested parties, both internal and external, is facilitated through:

Contractor Safety Meetings: All contractor employees meet monthly to address safety concerns and issues discovered through the routine operation and maintenance of the service system. Multiple meetings in all divisions are scheduled to allow all staff to attend. The meeting is led by a representative from the contractor safety team. CCTS Risk Management staff attend and actively participate in these meetings no less than quarterly.

Transit Safety and Security Manager

The CCTS Transit Safety and Security Manager is responsible for the implementation of the AGENCY SAFETY PLAN. Specifically, the Transit Safety and Security Manager:

- Issues and maintains the AGENCY SAFETY PLAN
- Promotes the Culture of Safety
- Oversees the Hazard Management Process
- Collects and analyzes safety data
- Oversees the accident/incident investigation
- Assures AGENCY SAFETY PLAN compliance/procedures review
- Conducts safety reviews/inspections
- Ensures compliance with safe and healthy work practices by employees and contractors
- Communicates with employees regarding occupational health and safety issues
- Identifies, evaluates and corrects hazards in a timely manner
- Assists other departments in resolving hazards
- Ensures that all accidents, injuries, and illnesses are investigated and that recommendations for corrective actions are developed and implemented as warranted
- Ensures compliance with local, state and federal requirements

Public Safety Outreach

CCTS will provide safety information to passengers and public utilizing the three “E’s” of safety: Education, Engineering and Enforcement.

Educational opportunities for the customers and public will include relevant safety information in the CCTS Brochures, on the CCTS website, advertising and community events.

VIII. List of Definitions and Acronyms Used

Accident – An event that happens expectantly which may result in an undesirable or unfortunate happening causing harm, injury, damage, or loss. As defined in GO-164E, an event that involves any of the following: a loss of life; a report of a serious injury to a person; a collision involving a rail transit vehicle; a runaway train; an evacuation for life safety reasons; or a derailment of a rail transit vehicle, at any location, at any time, whatever the cause.



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

Agency or Transit Agency – means City of Corona Transit Service.

American Disabilities Act (ADA) – The American with Disabilities Act of 1990 gives civil rights protection to individuals with disabilities. Federal law prohibits discrimination on the basis of disability in employment, state and local government, public accommodations, commercial facilities, transportation and telecommunications.

California Public Utilities Commission (CPUC) – State regulatory agency that oversees and regulates railroad and rail fixed guideway safety in the State of California.

California Highway Patrol (CHP) – enforce traffic laws and manage traffic and emergency incidents in California

Caltrans – means the California Department of Transportation.

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

City of Corona Council – means governing body of City of Corona Transit Service.

CPUC Staff – CPUC employees responsible for safety oversight of RTAs.

Code of Federal Regulations, Chapter 49 (49 CFR) – Federal regulations governing all activities on the general railroad system of transportation in the United States.

Contractor – A third party operating or maintenance provider that performs tasks required on behalf CCTS.

Corrective Actions (CAs) or Corrective Action Plan (CAP) – Actions or a plan of actions that describes the tasks or measures implemented to minimize, mitigate, control, correct, or eliminate hazard, and the schedule for implementing those actions.

Emergency – An unexpected serious event or situation which requires immediate response to the urgent needs of the situation, or to maintain the security and/or integrity of the system, including, but not limited to, any of the following:



- a) Any accident that meets reporting criteria for a regulatory agency
- b) Any injury or illness requiring immediate medical attention, or fatality, involving persons on board a revenue vehicle
- c) Threatened, attempted, or successful suicides
- d) Serious threat to the security or safety of passengers and/or employees
- e) Any event requiring the evacuation of a passenger train
- f) Derailments on the main track or controlled siding
- g) Any unplanned event causing a significant disruption of rail service which may require the arrangement of alternative transportation for CCTS system passengers.

Employees – When used in this document, all executives, management, staff, labor, consultants, and contractors (and their sub-contractors) of CCTS.

Event – means any Accident, Incident, or Occurrence.

Federal Transit Administration (FTA) – FTA means the Federal Transit Administration, an operating administration within the United States Department of Transportation.

Hazard – Any real or potential condition (as defined in CCTS’ hazard management process) that can cause injury, illness, or death; damage to or loss of a system, equipment, or property; or damage to the environment.

Hazard Analysis – Any analysis performed to identify hazards for the purpose of their elimination, mitigation, or control.

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

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

Metropolitan Planning Organization (MPO) - A metropolitan planning organization is a federally mandated and federally funded transportation policymaking organization in the United States that is made up of representatives from local government and governmental transportation authorities.

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

Near Miss – A narrowly avoided accident. In railroad reporting, a near miss is any interaction with an object, vehicle or trespasser on or near the right of way which causes the engineer or operator to adjust the controls of the rail vehicle to include braking or slowing down.

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



Operator of a Public Transportation System—means a provider of public transportation as defined under 49 U.S.C. 5302(14).

Passenger – A person who is on board, boarding, or alighting from an CCTS vehicle for the purpose of travel.

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

Performance Target—means a specific level of performance for a given performance measure over a specified timeframe.

Personal Electronic Device (PED) – A device including but not limited to wireless phones, personal digital assistants, smart phones, two-way pagers, portable internet devices, laptop computers, DVD players, audio players, iPods, MP3 players, electronic games, Bluetooth devices, or any headphones or earbuds.

Public Transportation Agency Safety Plan (PTASP) – The comprehensive agency safety plan for RTAs that is required by 49 CFR 673 and based on Safety Management System.

Public Transportation Agency Safety Plan—means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

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

Risk Management Department -- When used in this document is composed of the CCTS Transportation Planning Supervisor and MV Transportation’s General Manager who will receive information, reports and will make a determination of who will receive such information up to the Risk Management Department of the City of Corona and MV Transportation.

Risk Mitigation—means a method or methods to eliminate or reduce the effects of hazards.

Safety – Freedom from harm resulting from unintentional acts or circumstances.

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

Safety Certification – The series of acts or processes that collectively verify the safety readiness of a project for public use.

Safety Committee –composed of Contractor staff and City of Corona staff refer to Safety Committee attachment for committee membership.



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

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

Safety Management System (SMS) Executive—means a Chief Safety Officer or an equivalent

Safety Performance Target—means a Performance Target related to safety management activities.

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

Safety Risk Assessment—means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management—means a process within a transit agency’s Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Safety Sensitive Employee – Safety-sensitive function means any of the following duties, when performed by employees of recipients, subrecipients, operators, or contractors:

- 1) Operating a revenue service vehicle, including when not in revenue service;
- 2) Operating a nonrevenue service vehicle, when required to be operated by a holder of a Commercial Driver's License;
- 3) Controlling dispatch or movement of a revenue service vehicle;
- 4) Maintaining (including repairs, overhaul and rebuilding) a revenue service vehicle or equipment used in revenue service. This section does not apply to the following: an employer who receives funding under 49 U.S.C. 5307 or 5309, is in an area less than 200,000 in population, and contracts out such services; or an employer who receives funding under 49 U.S.C. 5311 and contracts out such services;
- 5) Carrying a firearm for security purposes.

Vehicle means a bus, electric bus, van, automobile, rail car, trolley car, trolley bus, or vessel. A public transportation vehicle is a vehicle used for public transportation or for ancillary services.

Security – Freedom from harm resulting from intentional acts or circumstances.

Security Sensitive Information (SSI) – A category of sensitive but unclassified information under the United States government's information sharing and control rules. SSI is information obtained in the conduct of security activities whose public disclosure would, in the judgement of specified government agencies, harm transportation security, be an unwarranted invasion of privacy, or



reveal trade secrets or privileged or confidential information. SSI is governed by Title 49 of the Code of Federal Regulations (CFR), parts 15 and 1520.

Serious Injury—means any injury which:

- 1) Requires hospitalization for more than 48 hours, commencing within 7 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 5 percent of the body surface.

Small Public Transportation Provider—means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

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

State Safety Oversight Agency—means an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. 5329(e) and the regulations set forth in 49 CFR part 674.

System Safety – A principle of safety management, developed by the U.S. Military, which recognizes that all organizational plans, programs, policies, practices, and procedures impact the safety of the system as a whole. It requires that these be developed and implemented through a review process that provides for integration of individual departmental needs with the hierarchical needs of the entire system and/or organization.

Transit agency—means an operator of a public transportation system.

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

IX. Policies and Procedures

The programs, policies and procedures that the Agency uses to carry out its Agency Safety Plan are listed below. They can be found on the Agency’s Public Works “G-Drive” under “Corona’s Public Transportation Agency Safety Plan-Documents,” “Policies and Procedures” at the following links (will be located at URL...):

1. [MV TRANSPORTATION’S “SAFETY MANAGEMENT SYSTEM PLAN 2019”](#)



(All Cited Forms and Policies within MV Transportation’s “Safety Management System Plan 2019”

- a. **Safety Policy S-1, Incidents - Determining Preventability**
 - b. **Safety Policy S-10, Compliance with Federal And State Safety Regulations**
 - c. **Safety Policy S-12, Driver Refresher Training**
 - d. **Safety Policy S-18, Drivers - Prepared for Work**
 - e. **Safety Policy S-21, Facility Emergency Action Plan**
 - f. **Safety Policy S-27, Safety Meetings (must include CCTS Staff)**
 - g. **Safety Policy S-30, Injury Investigation - Supervisor Responsibility**
 - h. **Safety Policy S-32, Accident/Incident Reporting Procedures**
 - i. **Safety Policy S-37, New Driver Assessment / Validation**
 - j. **Safety Policy S-39, Location Safety Committees**
- 2. **“GM MONTHLY FACILITY SAFETY AUDIT FORMREV” (MV TRANSPORTATION)**
 - 3. **OPERATOR’S EVALUATION AND REFRESHER TRAINING FORM**
 - a. **SF-1, Driver Skills Evaluation And Refresher Training Form**
 - 4. **COACH OPERATOR PERFORMANCE EVALUATION FORM**
 - 5. **MV’S DRUG AND ALCOHOL POLICY**
 - 6. **MV’S EMPLOYEE HANDBOOK**
Issue Date: January 1, 2018
 - 7. **MV’S INJURY AND ILLNESS PREVENTION PROGRAM**
Issue Date: July 21, 2021
 - 8. **MV’S ROOT CAUSE ACCIDENT/INJURY FORM**
 - 9. **MV’S VIDEO EVIDENCE CHAIN OF CUSTODY POLICY / FORM**
 - 10. **CCTS SMS HAZARD & INCIDENT REPORT FORM**
 - 11. **SAFETY COMMITTEE MEMBERSHIP**
 - 12. **CITY OF CORONA_COVID-19 PREVENTION PROGRAM_REV 2021-1**

MV TRANSPORTATION, INC.

Safety Management System (SMS) Plan



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1. Safety Management Policy

Safety Management System (SMS) Policy Statement

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

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

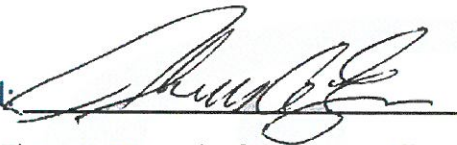
Every employee and contractor are directed and empowered to administer the SMS and its specific activities for the prevention, control, and resolution of unsafe conditions and actions. The primary objectives of this SMS plan are to proactively identify and mitigate safety hazards and risks, promote a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

Our safety objectives are to:

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

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

Signed:



Thomas Egan, Chief Executive Officer

Date: 10-28-2019

1.1 Commitment to Safety Statement

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

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

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

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

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

Every employee is responsible to:

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

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



Tom Egan
Chief Executive Officer



Mark Collins
President and Chief Operating Officer

Contractor Management

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

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

1.2 Safety Management System Development

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

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

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

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

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

1.3 Operations and Maintenance Procedures

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

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

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

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

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

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

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

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

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

Safety in Design, Acquisition and Procurement

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

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

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

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

1.4 Employment and Recruitment Selection

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

1.5 Drug and Alcohol Program

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

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

1.6 Workplace Violence Program

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

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

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

1.7 Fitness for Duty

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

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

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

1.8 Policies and Procedures Review

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

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

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

1.9 Employee Safety Reporting Program (ESRP)

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

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

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

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

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

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

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

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

Examples of reports may include the following;

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

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

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

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

1.10 Authorities, Accountabilities & Responsibilities

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

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

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

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

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

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

General Manager: Ultimate responsibility for the safety performance of the location and authorizes activities to support an effective SMS.

Operations Manager: Responsible for promoting operational safety and adhering to our policies and procedures.

Safety and Training Manager: Responsible for the day-to-day implementation and operation of the SMS.

Maintenance Manager: Responsible for OSHA compliance and site-specific maintenance activities.

Trainers / Instructors: Responsible for ensuring that we are training every employee to proficiency in accordance with our performance standards.

Supervisors: Responsible for playing an active role in SMS activities, including sufficient road observations and identifying potential safety hazards with recommended solutions.

Location Safety Committee: Responsible for ensuring that reported safety items are reviewed and addressed, as well as discussing proactive measures to mitigate future risk.

1.11 Emergency Management Integration and Procedures

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

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

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

1.12 SMS Documentation and Records

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

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

2. Safety Risk Management

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

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

2.1 Accident and Incident Reporting and Response

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

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

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

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

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

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

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

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

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

Work Injuries

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

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

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

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

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

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

Accident and Incident Investigation

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

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

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

2.2 Safety Hazard Identification and Analysis

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

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

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

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

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

Reviews

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

Observations

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

Audits and Inspections

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

Investigations

- Accident and incident investigation
- Injury root cause investigation

Hazard Analysis

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

2.3 Evaluation, Mitigation and Communication of Safety Risk

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

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

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

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

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

Hazard Resolution and Communication

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

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

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

3. Safety Assurance

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

Safety Assurance subcomponents includes:

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

3.1 Safety Performance and Monitoring and Measurement

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

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

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

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

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

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

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

Mitigation Monitoring

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

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

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

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

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

3.2 Management of Change

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

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

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

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

3.3 Continuous Improvement

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

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

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

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

4. Safety Promotion

4.1 Competencies & Training

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

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

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

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

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

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

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

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

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

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

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

Safety Culture

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

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

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

Elements of our Safety Culture Guide include:

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

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

4.2 Safety Communication

Communication of the SMS

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

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

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

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

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

Continuous Awareness and Safety Communication

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

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

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

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

Additional means of communication includes:

<ul style="list-style-type: none">• New Hire Orientation Training• Operational Safety Calls• Safety Meetings• One-on-one dialogue between supervisors and employees• Safety Briefings/Toolbox Talks	<ul style="list-style-type: none">• Safety Bulletin Board• Safety Committees• Posters, Flyers, & Memos• E-mail Communications• Internal Websites• Video/TV Displays
---	--

5. Supporting Resources

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

6. Plan Development

6.1 Approval and Updates

Version Number and Updates

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

6.2 Version Updates

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

6.3 Annual Audit and Review of Plan

Annual Audit & Review and Update of the Safety Management Systems Plan

Describe the process and timeline for conducting an annual review and update of the Safety Management Systems Plan.

During the final quarter the Safety Plan Committee will meet and review current SMS plan and make changes accordingly and update this SMS document. A communication will be sent out with an explanation of changes and a pdf copy of the updated plan will be made available via e-mail or web.

PTASP Addendum

Transit Agency Information

Transit Agency Name			
Transit Agency Address			
Name and Title of Accountable Executive			
Name of Chief Safety Officer or SMS Executive			
Mode(s) of Service Covered by This Plan		List All FTA Funding Types (e.g., 5307, 5310, 5311)	
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)			
Does the agency provide transit services on behalf of another transit agency or entity?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Description of Arrangement(s)
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided			

Safety Performance

Safety Performance Targets

Safety Performance Targets						
Specify performance targets and definitions based on the safety performance measures established under the National Public Transportation Safety Plan. The table below provides targets for fatality rate (reportable fatalities per revenue mile); injury rate (reportable injuries per revenue mile); safety event rate (reportable safety event per revenue mile); and system reliability (revenue miles between major mechanical failures).						
Mode of Transit Service	Preventable Accidents per 100K miles	Employee Injuries (Rate)	Fatalities (Rate)	Safety Events (Rate)	System Reliability (Rate)	

Safety Performance Target Coordination

Safety Performance Target Coordination		
MV Transportation will work with the agency to support them in their PTASP which includes analyzing historical trends to establish safety performance targets. Agency will coordinate directly with MPO and MV will help in this process as needed.		
Targets transmitted to stakeholders	Name	Date Targets Transmitted



Attachment A

1 HAZARD PROBABILITY TABLE

Probability Level	Description
A – Frequent	Likely to occur frequently. Continually experienced in the fleet/inventory.
B – Probable	Likely to occur several times in life of an item. Likely to occur frequently in the fleet/inventory.
C – Occasional	Likely to occur sometime in life of an item. Likely to occur several times in the fleet/inventory.
D – Remote	Unlikely, but possible to occur in the life of an item. Reasonably expected in the fleet/inventory.
E – Improbable	So unlikely, occurrence is not expected. Unlikely to occur, but possible in the fleet/inventory.

2 RISK ASSESSMENT FREQUENCY/SEVERITY MATRIX

Frequency	Severity			
	1 Catastrophic	2 Critical	3 Marginal	4 Negligible
A – Frequent	1/A	2/A	3/A	4/A
B – Probable	1/B	2/B	3/B	4/B
C – Occasional	1/C	2/C	3/C	4/C
D – Remote	1/D	2/D	3/D	4/D
E – Improbable	1/E	2/E	3/E	4/E

3 HAZARD RESOLUTION TABLE

Severity / Frequency	Resolution
1/A 1/B 1/C 2/A 2/B 3/A	Unacceptable—correction required.
1/D 2/C 2/D 3/B 3/C	Unacceptable—correction may be required after review by CEO.
1/E 2/E 3/D 3/E 4/A 4/B	Acceptable—with review by CEO.
4/C 4/D 4/E	Acceptable—without review.

Attachment B

MV Transportation SMS Hazard/Risk Report Form	
This report concerns:	<input type="checkbox"/> Hazard <input type="checkbox"/> Risk <input type="checkbox"/> Near Miss <input type="checkbox"/> Other
Hazard Type:	<input type="checkbox"/> Policy/Procedure <input type="checkbox"/> Operational <input type="checkbox"/> Environmental <input type="checkbox"/> Equipment/Design <input type="checkbox"/> Training
REPORTED BY:	<input type="checkbox"/> Employee <input type="checkbox"/> Customer/Passenger <input type="checkbox"/> Other: ie: PD or FD
NAME:	LOCATION:
Description of Safety Concern:	
PHOTOS: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Hazard Analysis: According to Hazard Severity Matrix	<input type="checkbox"/> 1 Catastrophic <input type="checkbox"/> 2 Critical <input type="checkbox"/> 3 Marginal <input type="checkbox"/> 4 Negligible
Recommended Safety Risk Mitigation:	
Supervisor/Safety Manager Comments/Actions:	
Supervisor/Safety Manager:	

Hazard/Risk Resolution

Is Hazard/Risk corrected "On the Spot"?

Yes No

If the answer is "No" then proceed with the steps below:

This report must be forwarded to the SAFETY DEPARTMENT; report is assigned to specific department(s) for hazard rectification; report is assigned a priority

Priority:

High Medium Low

Hazard/Risk/ Near Miss deficiency corrected?

Yes No

Date closed if "Yes"

Date

If answer is NO, notify Safety department to begin continuing action for resolution, and send to the Safety Team or Staff for recommendations.

List how the Hazard/Risk/Near Miss was resolved

Date Resolved

Date

Appendix

Please add any relevant contract documentation specific to plan.

MV TRANSPORTATION, INC. CORPORATE POLICY STATEMENT

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Policy #	Safety Policy S-1
SUBJECT	INCIDENTS - DETERMINING PREVENTABILITY
POLICY	<p>.SCOPE: This policy affects all employees who operate Company vehicles or perform work on behalf of the company.</p> <p>PURPOSE: The purpose of this policy is to provide a standard to evaluate each incident according to our Defensive Driving or Safe Work Standards so that errors made in either driver performance or safe work practices will be recognized and corrected during retraining.</p> <p>POLICY: It is the policy of this Company that each incident be evaluated on an individual, objective basis using the guidelines outlined here. MV Transportation, Inc. adheres to a very strict interpretation of the definitions of preventability and defensive driving. Realistically speaking, most incidents can be prevented by our drivers/employees through diligent application of our driving standards and safe work practices. MV drivers and employees are held to a high standard of care by the law and Company practice.</p> <p>1.1 <u>Definition of Preventable Incident</u> – an incident where the driver could have, but failed, to properly identify an incident-producing situation soon enough to take reasonable and prudent action to avoid a collision or an injury.</p> <p>2.2 <u>Definition of Defensive Driving</u> - to drive in such a manner as to identify incident-producing situations soon enough to take reasonable and prudent action to avoid a collision. This is the MV Standard of Safe Driving Performance</p>

WORKPLACE INCIDENTS

The following considerations apply to workplace incidents that cause (or could have caused) injury to either the employee or bystanders/other persons.

Considerations

Unsafe Acts:

1. Unauthorized operation of equipment
2. Unauthorized performance of a job or task
3. Running - Horse Play
4. Not following established procedures
5. Bypassing or failure to use safety devices
6. Not using protective equipment
7. Under influence of drugs or alcohol

Unsafe Conditions:

1. Ergonomic hazards
2. Environmental hazards
3. Inadequate housekeeping
4. Blocked walkways
5. Improper or damaged Personal Protective Equipment (PPE)
6. Inadequate machine guarding
7. Inadequate maintenance of machines or tools

Non-preventable if:

1. Mechanical defect in a machine or tool which could not have been detected or foreseen by the operating employee or through routine maintenance.

Preventable if:

1. Incident or injury can be attributed to an unsafe act or unsafe condition.
2. Employee performed a job or task for which he/she was either not trained or inadequately trained (would be a failure in the supervisory/training process).
3. Incident or injury occurred due to employee's failure to use (or improper use of) personal protective equipment.
4. Incident or injury occurred due to employee's use or attempted use of a vehicle, machine or tool that he/she knew was defective.
5. Employee's abuse of a machine or tool was such that it rendered the tool or machine defective.

VEHICLE INCIDENTS

A: Struck in Rear by Other Vehicle:

Non-Preventable if:

1. Driver's vehicle was legally and properly parked.
2. Driver was proceeding in his own lane of traffic at a safe and lawful speed.
3. Driver was stopped in traffic due to existing conditions or was stopped in compliance with traffic sign or signal or the directions of a police officer or other person legitimately controlling traffic.
4. Driver was in proper lane waiting to make turn.

Preventable if:

1. Driver was passing slower traffic near an intersection and had to make sudden stop.
2. Driver made sudden stop to park, load, or unload.
3. Driver rolled back into vehicle behind while starting on grade.
4. Driver made sudden stop to avoid striking other vehicle in the rear.

B. Struck While Parked:

Non-Preventable if:

1. Driver was properly parked in a location where parking was permitted.
2. Vehicle was protected by emergency warning devices as required by DOT and state regulations or if driver was in the process of setting out or retrieving signals. These provisions shall apply to the use of the turn signals as emergency warning lights under DOT regulations.

C. Incidents at Intersections:

Preventable if:

1. Driver failed to control speed so that he could stop within available clear sight distance.
2. Driver failed to check cross-traffic and wait for it to clear

before entering intersection.

3. Driver pulled out from side street in the face of oncoming traffic.
4. Driver collided with person, vehicle, or object while making right or left turn.
5. Driver collided with vehicle making turn in front of him.

D. Striking Other Vehicle in Rear:

Preventable if:

1. Driver failed to maintain safe following distance and have his vehicle under control.
2. Driver failed to keep track of traffic conditions and note slow downs.
3. Driver failed to ascertain whether vehicle ahead was moving slowly, stopped, or slowing down for any reason.
4. Driver misjudged rate of overtaking.
5. Driver came too close before pulling out to pass.
6. Driver failed to wait for car ahead to move into the clear before starting to move.
7. Driver failed to leave sufficient room for passing vehicle to get safely back in line.
8. Driver was over-driving his vision.

E. Sideswipe and Head-on Collisions:

Preventable if:

1. Driver was not entirely in his proper lane of travel.
2. Driver did not pull to his right and slow down and stop for vehicle encroaching on his lane of travel when such action could have been taken without additional danger. (Buses with passengers should not run off the road.)

F. Squeeze Plays and Blockouts:

Preventable if:

1. Driver failed to yield right-of-way when necessary to avoid an accident.
2. Driver failed to properly position vehicle in preparation for the turn

G. Backing Incidents:

Preventable if:

1. Driver backed up when backing could have been avoided by better planning of his route.
2. Driver backed into traffic stream when such backing could have been avoided.
3. Driver failed to get out of vehicle and check proposed path of backward travel.
4. Driver failed to get out of vehicle periodically and recheck conditions when backing a long distance.
5. Driver failed to sound horn and turn on 4-way flashers prior to and while backing.

H. Incidents Involving Rail-Operated Vehicles:

Preventable if:

1. Driver attempted to cross tracks directly ahead of train or streetcar.
2. Driver ran into side of train or streetcar.
3. Driver stopped or parked on or too close to tracks.
4. Driver disregarded warning lights or devices.
5. Driver failed to stop at crossing as required by regulations.

I. Incidents While Passing:

Preventable if:

1. Driver passed where view of road ahead was obstructed by hill, curve, vegetation, traffic, adverse weather conditions, etc.
2. Driver attempted to pass in the face of closely approaching traffic.
3. Driver failed to warn driver of vehicle being passed (e.g. horn, and/or turn signal indicators).
4. Driver failed to signal change of lanes.
5. Driver pulled out in front of other traffic over-taking from rear.
6. Driver cut-in short returning to lane of travel.

J. Incidents While Being Passed:

Preventable if:

1. Driver failed to stay in his own lane and hold speed or reduce it to permit safe passing.

K. Incidents While Entering Traffic Stream:

Preventable if:

1. Driver failed to signal when pulling out from curb.
2. Driver failed to check traffic before pulling out from curb.
3. Driver failed to look back to check traffic if he was in position where mirrors did not show traffic conditions.
4. Driver attempted to pull out in a manner that forced other vehicle(s) to change speed or direction.
5. Driver failed to make full stop before entering from side street, alley or driveway.
6. Driver failed to make full stop before crossing sidewalk.
7. Driver failed to yield right-of-way to approaching traffic.

L. Pedestrian Incidents:

Preventable if:

1. Driver did not reduce speed in area of heavy pedestrian traffic.
2. Driver was not prepared to stop.
3. Driver failed to yield right-of-way to pedestrian.

M. Mechanical Defects Incidents:

Preventable if:

1. Defect was of a type which driver should have detected in making pre-trip or enroute inspection of vehicle.
2. Defect was of a type which driver should have detected during the normal operation of the vehicle.
3. Defect was caused by driver's abusive handling of the vehicle.

	<p>N. All Types of Incidents:</p> <p><u>Preventable if:</u></p> <ol style="list-style-type: none"> 1. Driver was not operating at a speed consistent with the existing conditions of road, weather and traffic. 2. Driver failed to control speed so that he could stop within assured clear distance. 3. Driver misjudged available clearance. 4. Driver failed to yield right-of-way to avoid accident. 5. Driver failed to accurately observe and recognize potentially existing hazardous conditions or events that could produce an accident. 6. Driver was in violation of Company operating rules or special instruction, the regulations of any federal or state regulatory agency, or any applicable traffic laws or ordinances. 	
Effective Date		
Review Date		
RELATED TOPICS		
FORMS		
BRIDGES ENDORSEMENT		Date:
APPROVED BY		Date:

MV TRANSPORTATION, INC. CORPORATE POLICY STATEMENT

General policies of MV Transportation, Inc. are issued from time to time and are designed to provide general guidance to company managers in the conduct of the business. Policies may, from time to time, become dated or may no longer apply. In the event of questions, the policy should be referred to the General Counsel for interpretation. In the event a policy conflicts with the law, regulation or the terms of a contract with a customer, the policy will be subordinate to such law, regulation or contract term. Policies are only effective on the written approval of the Chief Executive Officer, and the endorsement of the Bridges Committee.

Policy #	Safety S-10
SUBJECT	COMPLIANCE WITH FEDERAL AND STATE SAFETY REGULATIONS
POLICY	<p>SCOPE: These regulations govern all driving and non-driving operations at MV Transportation, Inc.</p> <p>POLICY: It is the policy of MV Transportation, Inc. that company operations and all personnel will comply with all applicable requirements of Title 49 Code of Federal Regulations and in particular with the Federal Motor Carrier Safety Regulations' Parts 40, 325, 382, 383, 385-387, 390-396, 399 and 640 (or their individual States' equivalent) and with the provisions of Part 1910 of the Occupational Safety and Health Administration regulations.</p> <p>PROCEDURE: Personnel will refer to the Regulations for interpretation of any covered rules regarding MV Transportation, Inc. driving and maintenance operations.</p> <p>The Safety Department is available to provide further assistance.</p>
Effective Date	

Review Date		
RELATED TOPICS		
FORMS		
BRIDGES ENDORSEMENT		Date:
APPROVED BY		Date:

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Policy #	Safety Policy S-12
SUBJECT	Driver Refresher Training
POLICY	<p>All MV operators will receive refresher or remedial training, as necessary, throughout their employment with the Company. This training will be conducted as outlined below and documented in local personnel files and training records using the Driver Refresher Training Report Form.</p> <p>Only qualified personnel (General Managers, Operations Supervisors, Safety Managers, or Driver Instructors/BTWs) will administer driver refresher training courses. Under no circumstances will any driver be allowed to return to driving duties unless they demonstrate full proficiency in all applicable driving performance tasks</p> <ol style="list-style-type: none"> I. Refresher or Remedial training is mandatory under the following conditions: <ol style="list-style-type: none"> A. <u>Return To Work (from inactive status)</u> – Required when a driver/operator returns from “inactive” status (from a period of 30 days or more). In these cases, the driver must receive a one-day/8 hours “general purpose” refresher training designed to remind the driver of the general standards and defensive driving guidelines in effect at MVT and to ensure his/her proficiency. B. <u>Post Accident / For cause</u> – Required after every “preventable” accident, or whenever mandated by management for retraining / corrective purposes. C. <u>Seasonal</u> – Required annually at all divisions operating in seasonal adverse weather environments (i.e.: Winter driving, onset of adverse weather, etc.). D. <u>Biannually</u> – At a minimum of every two years, each driver/operator shall receive a “general purpose” refresher training designed to

remind the driver's of MVT driving standards and validate the driver's proficiency with MVT defensive driving requirements.

II. Course content:

A. **Return To Work:** This refresher is mandatory for any driver who has been away from work for 30 days or more (sick leave, family leave, furlough, worker's compensation, etc.). Reviewing the most up-to-date videos and the behind-the-wheel assessment are important components of this type of refresher. Minimum content is as follows:

1. Safety standards review (Classroom): This training will include a thorough general review of our safety standards and defensive driving guidelines. This is accomplished through review of the applicable portions of the Driver Training School Curriculum and the applicable safety videos.
2. "Behind The Wheel" (BTW) Road Check: The Road-Check portion of the Return-to-Work Refresher is probably the most critical part of the refresher, as it offers the driver the hands-on opportunity to re-establish his or her familiarity with our standards, and with the maneuverability and dimensions of the bus. If the driver has developed any unsafe driving behaviors/habits, the instructor will also be able to identify what driving deficiencies are present, and correct them before certifying the refresher as "satisfactory." The BTW portion will include a minimum of 30 miles or two hours, and cover city (urban), secondary, and freeway driving environments, with emphasis on city and freeway driving.

The time involved for completion of this refresher is variable. The driver must demonstrate his ability to perform all of the required tasks to standard. Particular attention will be given to the following areas:

- a) Pre/Post trip inspections
- b) Brake release procedures (Air brake vehicles)
- c) Gear selection & transmission use
- d) Proper Scanning Habits
- e) Turns & Intersections
- f) Merging & Lane changes
- g) Backing
- h) Speed Control
- i) Following Distance
- j) Use of Brakes
- k) Railroad Crossings
- l) Lift Operations
- m) Wheelchair Securement

Individual Divisions are free to also include any topics/material pertinent to local driving conditions (for example, driving in heavy traffic, mountain terrain, etc.).

- B. **Post-Accident / For Cause Remedial Training**: This training is mandatory for any driver who has received a “preventable” rating for an accident/incident.

Because (by definition) the driver could have avoided the accident/incident, but failed to do so, it is imperative that the driver receives this remedial training as soon as possible, in order to prevent another similar occurrence. Therefore, the post-accident remedial training must be scheduled and given within 10 days following the formal accident rating.

Before the refresher commences, the investigating supervisor will review the accident report with the individual who will conduct the training (i.e.: a driver instructor or BTW instructor), discuss the accident’s cause(s) and contributing factors, and what specific driving standards were not applied correctly. They should then tailor the remedial training to correct the driving deficiencies and standards that contributed to the accident.

This training will include a review of the appropriate materials / videos, and behind-the-wheel training.

The amount of time needed for a post-accident refresher is variable, and it will depend on the driver’s ability to perform the appropriate tasks to standard. **The driver must demonstrate his / her ability to perform all of the required tasks to standard before being allowed back to driving duties.**

For instance, if the supervisor has determined that the driver did not perform a right turn correctly, the appropriate videos might include material on effective seeing habits, proper positioning of the vehicle, reference points, lane choice. The items highlighted on the refresher report would include “Positioning of the bus for turn,” “Use of Mirrors,” “Speed,” “Proper Use of Signals,” “Ability to Judge Bus Size,” “Use of Horns,” “Aggressive in Traffic,” “Aware of Hazards.” The driver instructor would then proceed with the behind-the-wheel training with a clear understanding of what driving deficiencies may need correcting, and ensure that the driver is able to perform the appropriate tasks to standard.

	<p>Currently, under normal circumstances, it is our practice to keep the driver in-service pending the outcome of the accident investigation. However, if Division or Regional management feels the driver involved in the accident poses an imminent danger or threat to the safe operation of a bus (due to a serious driving deficiency or, possibly, a physical or mental impairment), do not hesitate to place the driver out-of-service until it has been determined that the driver is qualified to drive safely.</p> <p>C. Seasonal Refreshers: These refreshers are conducted in preparation of operations during certain periods of the year. At a minimum, this refresher will be given in the fall, before the beginning of winter season, to all division’s drivers, and includes refresher topics appropriate for the region, imminent weather, environmental, and traffic conditions. The training will include topics/material appropriate for the season in question, using existing safety videos and lesson modules from the standard Driver Training School.</p> <p>D. Bi-Annual Refresher: This is a mandatory bi-annual (every two years) general defensive driving refresher. All in-service drivers will attend this refresher every two years to ensure they are using appropriate defensive driving habits/techniques (have not become complacent) and will follow the same content requirements of the “Return To Work” refresher listed in “A” above.</p>	
Effective Date		
Review Date		
RELATED TOPICS		
FORMS		
BRIDGES ENDORSEMENT	Jack Hempstead	Date: 6/2/09
APPROVED BY		Date:

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Policy #	Safety Policy S-18
SUBJECT	DRIVERS - PREPARED FOR WORK
POLICY	<p>SCOPE: This policy applies to all drivers for MV Transportation, Inc.</p> <p>POLICY: It is the policy of this company that all drivers are professionals who come to work well rested and prepared to provide a full measure of customer service.</p> <p>PROCEDURE:</p> <p>The company is committed to the safety of its passengers and employees. All drivers must arrive at work on time and properly rested.</p> <p>Drivers are to be licensed in the State where they have true, fixed, and permanent homes and principal residences, and to which they have the intention of returning after an absence involving an assignment.</p> <p>Grooming and uniforms must be in accordance with company policy.</p> <p>DOT Logs (where applicable), DOT medical card, and Driver's License must be valid and current.</p>
Effective Date	

Review Date		
RELATED TOPICS		
FORMS		
BRIDGES ENDORSEMENT		Date:
APPROVED BY		Date:

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Policy #	Safety Policy S-21
SUBJECT	FACILITY EMERGENCY ACTION PLAN
POLICY	<p>SCOPE: This policy affects all MV Transportation, Inc. Divisions.</p> <p>POLICY: It is the policy of this Company that each MV facility (Division) develops and implements a written Emergency Action Plan. This plan must address, at a minimum, the elements specified in the Minimum Requirements for Emergency Action Plans.</p> <p>RESPONSIBILITY: All General Managers are required to develop, maintain, update and provide necessary training to ensure employees are aware of various life threatening situations, and know appropriate procedures to be followed during an emergency event. The Safety Department and the Area Safety Directors are available to assist as needed.</p> <p>MINIMUM REQUIREMENTS FOR EMERGENCY ACTION PLANS:</p> <p>Emergency Action Plans used by MV Transportation, Inc. (MVT) facilities must include the following elements:</p> <ul style="list-style-type: none">• Persons responsible for implementing and updating the plan.• Methods of notifying employees of emergency situation.• Map of facility, clearly indicating exits.• Methods to be used for marking exits.• Requirements for keeping exits clear.• Methods and routes of evacuation.• Any codes used to identify specific events.

- Phone numbers for local police, fire and medical services.
- Phone numbers for any Facility Emergency Action personnel.
- Employee training and drills.
- Posting requirements.
- Inspection procedures.
- Placement of buses/vehicles for security and safety.

Specific actions for dealing with the following emergencies/contingencies:

- Severe weather
- Bomb threats
- Fire and explosion
- Flooding
- Sabotage
- Snipers or shooters
- Procedures for plant shutdowns
- Hurricanes and tornadoes
- Civil strife
- Earthquakes
- Heighten security levels

A. General Requirements:

The Facility Emergency Action Plan is a written program addressing all the elements listed above. The plan should be simple and direct, using uniform emergency procedures (i.e.: evacuations). Emergency drills must be performed at least annually.

The emergency action plan needs to address the specific actions your location will take if an emergency occurs. Management and supervisory employees should be aware of any specific actions they or other designated employees are to take during the emergency. General Managers need to ensure all Division employees are knowledgeable/trained with the contents of the plan and the specific actions required from them in case of emergency. General Managers must provide an updated copy of the plan to their respective VP of Safety.

The VP of Safety and the Area Safety Directors are available to assist General Managers in drafting their Division's Emergency Action Plan.

EMERGENCY ACTION PLAN TEMPLATE:

The following is the template for MVT facilities' Emergency Action Plans. This template provides minimum requirements and can be modified to meet local requirements and/or operating environment.

Persons Responsible for Plan Implementation:

General Manager: The Facility Manager is responsible for maintaining and updating the plan. The General Manager 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.

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 supervisors.

TEMPLATE / FORMAT

A. Facility Notification System:

The MV Transportation, Inc. facility located at _____ 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 situation 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 to assure all employees are accounted for and out of the building.

The MV Transportation, Inc. facility located at _____ is also equipped with a facility-wide public address system. In the event of an emergency, instructions will be issued over the PA system, stating the nature of the emergency, and the appropriate action to be taken.

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 and dorm rooms.

C. Marking of Exits:

All emergency exits at MV facilities shall 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 shall be clearly marked "NOT AN EXIT."

D. Emergency Exits Requirements:

- MV facilities must be equipped with a sufficient number of exits to allow the rapid and orderly evacuation of all personnel.

- Emergency Exits and the approach to Exits must be kept clear at all times.
- Emergency Exits doors must remain unlocked at all times 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.
- In hazardous areas, or where there is a chance that one Emergency Exit may become blocked by fire or smoke, at least two separate and remote Emergency Exits must be in place.
- Doors to any employee work area must be designated so that workers cannot be locked inside a room at any time.

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.
- 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.
- Management should identify where to go when an emergency requires the evacuation of the facility or relocation to an alternate facility. Facility Evacuation Routes and Relocation Maps directing employees to the designated alternate location should be part of the written emergency plan (App. C & D). Management needs to identify essential equipment or supplies needed at the alternate site.
- The emergency action plan shall also include details on who (managers, supervisors, etc.) will perform specific duties, such as ensuring customers and employees receive instructions on how to safely exit the building.

- MV managers may initiate either employee evacuation or relocation in an emergency. When an evacuation or relocation order is issued, employees and customers will be instructed where to go. Employees should report to this location and remain there until further instructions by their manager or other competent authority. Supervisors must account for all members of their work crews.

F. Phone Numbers for Fire, Police and Medical Services:

The following numbers are provided for use in emergencies and must be posted for employees to see (Appendix E):

POLICE: _____

FIRE: _____

MEDICAL AID: _____

BUILDING SECURITY: _____

BUILDING MANAGER: _____

GENERAL MANAGER: _____

G. Employee Training and Drills:

All MV employees will receive initial training in the implementation of this Emergency Action Plan. Training will cover the contents of the plan and its required actions. Such training will be scheduled by the General Manager and documented at time of hire.

Subsequent training and drills will be performed and documented at least annually to ensure that employees remain familiar with the information in the emergency action plan, and proper evacuation and relocation procedures.

H. Posting Requirements:

Emergency exit information and emergency reporting information must be placed in a visible location in each work area. A copy of the Emergency Action Plan and the facility map should be located in an area where employees

congregate – near general bulletin board and time clock.

I. Inspection Procedures:

The General Manager will review the condition of the facility's emergency action preparedness program twice per year as part of a general safety audit. He will also perform random inspections as appropriate.

General Managers are responsible for ensuring the emergency equipment, posters, and information in their work area is kept in good condition and up-to-date. They will also ensure that all employed in their work crews receive appropriate training and orientation in the emergency action plan.

J. Facility Access Control:

Each facility must have designated procedures to 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 needs to be 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

K. Bomb Threats:

- Employees will receive training on bomb threat procedures. A copy of the telephone bomb threat checklist is attached (Appendix B).
- All bomb threats must be promptly reported via the MV Event Notification procedures.

L. Unattended Baggage/Packages:

All employees must be encouraged to maintain a high degree of awareness for 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.

M. 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.

N. 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, 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 location specified in the PA announcement, or as directed by the facility manager.
- Remain at that location until instructed to go elsewhere.

O. Chemical Spills/Fuel Leaks:

On-site personnel will handle surface spills with absorbent. 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.

P. Flooding:

Flooding does not typically occur without warning. Some time for preparation is usually possible. The General Manager will determine the appropriate action to be taken in specific instances of flooding. Consideration should be given to facility shutdown procedures, protection of assets and individuals from flooding, employee parking access and

electrical and fire hazards involved.

Q. Hurricanes, Tornadoes and Other Severe Weather:

Hurricanes and tornadoes involve damaging high winds, with possible lightening, rain, and hail damage. Hurricanes occur primarily off the Gulf and East coasts. Tornadoes can occur in any location, although they are most likely in the South and Midwest. Advance notice is usually given of hurricanes, but tornadoes can strike without warning.

- **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 MV 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, sand-bags, 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 over the PA system. 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 the all clear is given.

R. 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.

S. 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.

T. 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 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.

U. 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.
- De-energizing electrical equipment or circuits.
- Shutdown of fuel pumps / underground fuel tanks
- Storage of tools and equipment.
- Inventory procedures for shutdowns.
- Planned and unplanned shutdowns.
- Personnel responsibilities during shutdowns.
- Restoring operations.

	<p>Appendices:</p> <ul style="list-style-type: none"> A. Facility Map B. Bomb Threat Checklist C. Directions and Map to Evacuation Site D. Directions and Map to Relocation Site E. List of Emergency Phone Numbers 	
Effective Date		
Review Date		
RELATED TOPICS		
FORMS		
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APPROVED BY		Date:

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Policy #	Safety Policy S-27
SUBJECT	SAFETY MEETINGS
POLICY	<p>SCOPE: This policy covers all employees of MV Transportation, Inc.</p> <p>POLICY: It is the policy of MV Transportation, Inc. to seek and encourage its employees' assistance in identifying workplace hazards. One effective vehicle is through safety meetings, which provide employees an opportunity to provide input regarding safety issues and receive updated safety education/information. All MV Divisions will make possible the opportunity for employees to participate in safety meetings.</p> <p>PROCEDURE:</p> <ul style="list-style-type: none">• All Divisions will have regularly scheduled monthly safety meetings. These meetings will be open to all employees.• General Managers will post in advance the time, date and location of all regularly scheduled safety meetings.• Specific topics for the agenda must be posted with the announcement of the pending meeting.• The agenda must cover only safety-related items. Agenda items will be directed by management.• Employees must speak for themselves and cannot be represented by anyone else.

	<ul style="list-style-type: none"> • The manager should advise concerned employees of the results of the meeting and indicate all corrective action taken since the last meetings. • Care must be taken not to interfere with the collective bargaining rights of the respective unions. These safety meetings are not "committees" and not intended for the bargaining of safety-related issues. Their purpose is to allow individual employees to voice their concerns and to educate employees on relevant safe-work and incident/injury prevention practices. <p>Questions on safety meetings shall be directed to the Vice President of Safety.</p>	
Effective Date		
Review Date		
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BRIDGES ENDORSEMENT		Date:
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Policy #	Safety Policy S-30
SUBJECT	INJURY INVESTIGATION - SUPERVISOR RESPONSIBILITY
POLICY	<p>SCOPE: This policy applies to all employees of MV Transportation, Inc.</p> <p>PURPOSE: The purpose of this policy is to describe investigation procedures performed by supervisors in the event an employee is injured.</p> <p>POLICY: It is the policy of MV Transportation, Inc. to investigate all incidents/injuries, to identify causes, and to correct deficiencies, if any.</p> <p>RESPONSIBILITY:</p> <p><u>Supervisors:</u></p> <ul style="list-style-type: none">• Begin the investigation immediately after receiving the first report of injury. Employees must report all injuries to management as soon as they occur.• Visit the incident site, if possible, to determine where each object, person, and element in the event was located just prior to the mishap. Get the "big picture", as exact as possible.• Interview all persons involved, beginning with the injured employee whenever possible. Assure the employee the purpose of the investigation is not to place blame but to establish cause in order to prevent a recurrence. Re-enact exactly what was being done in the moments leading up to the injury.

- Determine what type of injury was received. Evaluate against the exact activity and detailed sequence of actions leading to the injury. Does the action fit the injury?
- Review and record all physical evidence from the accident site. Site diagrams including photos and measurements of key elements and materials should be included.
- Record the facts surrounding the accident on the Supervisor's Investigation Report.

Analyze the facts to determine WHY the accident happened. Understanding injury causes is essential in the effort to eliminate future similar accidents. Several major types of causal factors exist and the investigation should seek answers in each category to ensure an in-depth analysis:

- Unsafe Acts - the actions of the individual that precede and bring about the accident.
- Unsafe Conditions - factors in the physical environment that contributed to the accident.
- Indirect Human Factors - conditions, characteristics or attitudes of the individual that influenced the accident.
- Knowledge or skill deficiency - did not understand the risk
- Improper attitude or motivation - aware of the risk but in a hurry to complete the job.
- Mental or physical state factors - risk was known and normally would not have been taken, but the individual was fatigued or inattentive.

Indirect Environmental Factors - the reason for the unsafe condition to exist in the environment.

- Actions of workers in general.
- Errors existing from design.
- Improper purchasing practices.
- Abnormal wear and tear on equipment.
- Failure to maintain.
- Failure to maintain properly.

	<p><u>Correct the problem/deficiency immediately!</u></p> <ul style="list-style-type: none"> • Make recommendations for corrective actions to improve the management system. <p>Submit reports as required to:</p> <ul style="list-style-type: none"> • Risk Management • Regional Manager - Maintenance • General Manager • Area Safety Director • <p>Additionally, OSHA must be notified within 8 hours in the event of a death or when 3 or more persons require hospitalization (See policy on OSHA Record-keeping).</p>	
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Policy #	Safety Policy S-32
SUBJECT	Accident/Incident Reporting Procedures
POLICY	<p>SCOPE: This policy affects all MV employees who operate company vehicles/buses, as well as managers and supervisors who investigate incidents.</p> <p>POLICY: It is the policy of this Company to minimize injury, damages, pain and suffering for people involved in vehicular mishaps involving MV vehicles, to promptly report and to thoroughly investigate these occurrences.</p> <p>PURPOSE: The guidelines in this policy designate the procedures for all employees to follow when an incident occurs and to ensure accurate and timely incident reporting.</p> <p>An <i>Incident</i> is any MV mishap involving a MV employee, MV passenger, MV vehicle, MV equipment, or the environment. An incident may or may not result in injury or death to a person, damage to vehicles or property, or damage to the environment. This includes alleged incidents which are claimed to be caused by a MV employee, vehicle, or equipment; even though the MV employee, vehicle, or equipment is not affected.</p> <p>PROCEDURE:</p> <p>This procedure applies to all MV losses (<u>other than Workers' Compensation</u>) to include:</p> <ul style="list-style-type: none"> • Vehicular collision with any person, vehicle, or object • Passenger/Customer/Client Incident/Injury • MV Vehicle Physical Damage (including unknown yard physical damage) • MV Property (buildings/contents) Losses (fire, tornado,

flood, hurricane, vandalism, break-in, etc.).

- Environmental Exposures (i.e. fuel, oil, antifreeze, or other spills)
- Theft of MV vehicles, equipment, or property

When an incident could have been avoided, it was a preventable loss. MV Safety investigates "major" preventable incidents (see below for definition) to determine cause; and monitors preventable incidents to spot trends and to determine the trends' root causes. This includes examining driving and work procedures and revising them if found faulty; and identifying violations of MV, OSHA, DOT, FTA, or other procedures, rules or regulations.

INCIDENT TYPES

Major: An incident involving a transit vehicle or occurring on MV property involving one or more of the following:

- Fatality
- Pedestrian or Bicyclist incident/injury
- Passenger incident/injury involving lift
- Passenger incident/injury while entering/exiting vehicle
- Passenger incident/injury involving improper wheelchair securement
- MV Operator is cited for a moving violation
- Any injury (including to MV Operator) requiring immediate medical attention away from the scene
- Property damage equal to or exceeding \$5,000
- Environmental spills
- Vehicle roll-over/lay-over
- Vehicle fire
- Incidents with Operator allegation of equipment and/or maintenance failure
- Events with potential for negative public relations and/or news media coverage
- Incidents where Operator drug and/or alcohol use may be involved
- Incidents where fault is in question

Minor: All other incidents that do not meet the definition of a "major" incident.

INCIDENT REPORTING PROCEDURE:

1. All MV incidents shall be immediately reported from the scene.
2. Other than an hourly employee if at all possible it is the responsibility of the General Manager to make sure a person responds to the accident who will ensure care for our driver and equipment, review of accident investigation and proper review of company liability.
3. Operator at scene shall immediately contact Dispatch and provide incident details.
4. Immediately Call Auto Hotline at (866) 688-7475
5. Complete the Initial Accident/Incident Claim Line Information Sheet to assist with gathering the details and to aid in the verbal phone notification.
6. After the phone notification, immediately scan and e-mail this report to claims@mvtransit.com. If unable to e-mail, fax to (214) 646-1858.

MAJOR INCIDENTS PROCEDURES:

In case of major incidents, in addition to the above, managers shall take the additional steps outlined below:

1. Obtain the following basic information:
 - a. Time and Place of incident
 - b. Driver name and Date of Hire
 - c. Vehicle number and type (cut-away, van, bus, sedan, etc.)
 - d. Injuries, if transported from scene –where to and by whom.
 - e. Damage description
 - f. Basic facts of collision, accident or incident.
2. Call and notify the following persons:
 - a. Director of Safety and/or
 - b. Vice President of Safety
 - c. Regional Vice President
3. General Manager or designee submits a “High Priority Event

Notification: Go to "Lawson Portal/Procedures and Forms/Safety/Report a Serious Incident" and enter the required information.

4. Director of Safety and/or the Regional Vice President will continue the phone tree to the senior executives listed on a need to know basis.
5. If the Director of Safety and/or the Regional Vice President or Vice President of Safety is not available, please contact the Sr. VP of Safety, or in his absence, the President of Operations. If the President of Operations is not available, contact another Corporate Officer or Director who will then continue the phone tree as necessary.

NOTES:

- ***The only information given by MV employees should be to Police Officers present at the scene of the incident.*** Operator does not discuss incident/loss with witnesses – Operator only discusses with police, MV Safety personnel, MV Risk Management personnel, and/or MV Third-Party Claims Administrator personnel.
- ***Refer all other parties to Risk Management to handle any public and/or media questions.*** For these situations, please make sure you can provide Risk Management with the name and phone number of the inquiring party. If necessary, Risk Management will involve the Director of Media Relations to communicate to the public and/or media.

INCIDENT/ACCIDENT/LOSS PROCEDURES

1. Pre-Planning:

- a. General Managers/Dispatchers must be aware of all sources of assistance in handling incidents/losses. Before an incident/loss occurs, have contacts on hand for:
 - Operator's family and/or emergency notification
 - Local police department and/or local sheriff department
 - Highway patrol/state police
 - Local fire department and local ambulance service

- Tow truck, heavy equipment, and construction companies

MV Risk Management staff and MV Safety staff are excellent sources for help. Have their telephone numbers available.

- b. General Managers post their home telephone numbers and cell phone numbers so they can be called when an emergency occurs. Emergency Telephone Numbers shall be posted next to all MV telephones and shall be available at all supervisors' home telephones. This should include a list of local and MV telephone numbers used in controlling emergencies.
- c. Prominently place "reporting" decals in MV vehicles. The decals read, "**Should you be involved in an accident or should any other incident occur, immediately contact Dispatch who shall immediately communicate with you and the 24-Hour ClaimLine, (866) 688-7475.**" Place these stickers on the dash and on the driver-side sun visor.
- d. Equip MV vehicles with the following items:
 1. Three (3) bi-directional emergency reflective triangles (not flares).
 2. **Incident Reporting Packets and color disposable flash cameras.**
 3. Fire extinguisher having an Underwriters' Laboratories rating of 5 B:C or more.

To order replacement incident reporting packets and cameras, go onto Portal, under Procedures and Forms, and under Risk Management – there is an Incident Reporting Packets bullet point. Click on that bullet point, complete your order information, and submit your order.

2. Incident/Loss Occurs:

- A. **MV Operator: If involved in an incident with an unattended vehicle,**
 - a) Try to locate the owner.
 - b) If the owner cannot be located, Operator securely leaves a note on the vehicle with his/her name and address, and the company/division's name, address and phone number.

- c) Operator obtains the vehicle identification number and license plate number of the other vehicle, and includes that information when reporting the incident.
- d) An Incident Reporting Packet which includes a color disposable flash camera is supplied to Operator. Operator takes pictures of damages.
- e) Operator delivers used camera to General Manager/Dispatcher.

A. **If involved in a Hit and Run Incident** while on the job or in a company-owned vehicle and you record/obtain the adverse vehicle's license plate number or capture picture of adverse vehicle via camera or Drive Cam, it is mandatory that the police are called and an incident report is filled out and filed with them. Once this is completed, please forward this information to Risk Management.

B. **If otherwise involved in a vehicular incident**, Operator exercises on-scene emergency control until properly relieved by a supervisor or company official. Control will be directed to prevent further threat to human life, damage to the environment, and/or damage to property. For traffic control and to protect others:

1. Stop immediately and shut down vehicle (shift transmission into park, or neutral, shut off engine and set parking brakes).
2. Turn on four-way flashers.
3. **Place emergency reflective triangles as soon as possible, but in any event within ten minutes.**
4. Detour non-essential traffic.
5. Notify police/fire/ambulance. If necessary, direct a passerby to notify the proper authorities. Be sure to indicate if there are injured people at the emergency scene. Do not leave the scene except in an extreme emergency.
6. Do not move MV vehicle (unless there is a fire or spillage that may spread) until authorities arrive.
7. Do not allow any other vehicles to be moved until someone in authority arrives to verify the positions of the vehicles and the lengths and positions of skid marks. Calm down. Try to detach yourself from what has happened so you can be as objective and unemotional as possible. Don't smoke and caution others to not smoke; as there may be fumes that could cause an explosion or fire.

8. If safe, extinguish any controllable fire and/or shut off any leak.
9. Assist injured or endangered persons, but do not move them or permit them to get up unless absolutely necessary. Keep them warm and quiet until emergency help arrives.
10. Prevent fires by turning off ignitions, disconnecting battery cables, prohibiting smoking, or taking any other indicated action.
11. Prevent contact with spilled materials.
12. Do not touch (or permit others to touch) vehicles/objects in contact with downed power lines. Keep occupants in vehicles.
13. Keep sightseers back/away from emergency scene.
14. **Follow the Incident Handling Procedure/Instructions contained in the Incident Reporting Packet.**

3. Report incident/loss to dispatch and 24 hour Claim Line:

MV Operator at scene shall immediately contact Dispatch who shall immediately communicate with the Operator and 24-Hour Claim Line, (866) 688-7475 (See Incident reporting procedures above).

- Operator should never try to handle things alone.
- Call while the emergency is small and controllable.
- Dispatch shall provide a telephone number at which the Operator can be contacted. Usually this is the Dispatch number.
- Dispatch and Operator shall stay in telephone contact with the 24-Hour Claim Line until released.

4. Operator Takes Pictures of Scene and Damages:

MV vehicles are equipped with color disposable flash cameras:

- a. Photograph the causes of the incident.
- b. Photograph the incident scene before vehicles are towed or moved. Include surrounding landmarks / reference points in the pictures.
- c. If skid marks are long, start photographing 150 feet before skid marks begin and continue as you walk closer to the vehicle.

- d. Photograph vehicles, including points of impact, damaged areas, undamaged areas, and spilled materials.
 - e. Do **not** photograph bloody or gory details.
 - f. Make a sketch of the scene before any vehicles are moved. The important thing is to show the positions of the vehicles as they approached the scene and where they were following the collision.
5. **Equipment Recovery:** Division ensures proper damaged equipment handling and securement.
6. **Operator Identifies Himself/Herself:** Operator gives any other involved party his/her name, division name, division address, and division phone number; and if requested, insurance information from Insurance Identification Card located in glove box.
7. **Operator Provides Local Authorities and Emergency Responders Details of Incident/Loss:**
- a. Operator obtains any reports from authorities/police or emergency responders that must be completed.
 - b. Operator cooperates with police officials, but does not admit any responsibility to anyone except MV Risk Management personnel, MV Safety personnel, and/or MV Third-Party Claims Administrator personnel.
 - c. Operator does not give a formal statement (written or recorded) to anyone until Operator has contacted MV Risk Management, and then, not unless approved by MV Risk Management. Operator never discusses incident with reporters. Supervisor who may respond will support this.
 - d. Operator always notifies the police, no matter how minor an incident or collision may seem to be, even if it's just a minor "fender bender." Always report it to the police. If other party just wants to exchange information and not call the police, Operator calls in a report anyway.
8. **Operator Obtains Names and Addresses of Witnesses:**
- a. Operator gets names and addresses of all witnesses to the incident using Courtesy Information Cards contained

in Incident Reporting Packet.

- b. Operator does not discuss incident with witnesses – Operator only discusses with police, MV Safety personnel, MV Risk Management personnel, and/or MV Third-Party Claims Administrator personnel.

9. **Operator Completes Incident Report:** Operator completes “Incident Report” before leaving the incident scene.

This report is critical, as it captures MV information, third-party claimant information, client/passenger information, police information, an incident description, an incident diagram, etc.

10. **Operator Delivers:** Incident Report, Used Camera, Courtesy Information Cards, and any other Incident Reporting Packet Items to General Manager/Dispatcher.

Operator gives General Manager/Dispatcher Incident Report, Courtesy Information Cards, used camera, diagrams, sketches, etc.

11. **General Manager/Dispatcher Forwards Items to MV Risk Management:**

1. General Manager/Dispatcher immediately scans and e-mails items to claims@mvtransit.com.
 - If unable to e-mail, fax to **(214) 646-1858**.
 - General Managers retain originals for his/her records.
 - Several other reports may be completed from the information on these items, so it is important that the information is complete and accurate.
2. General Manager uploads any relevant photos and videos to OneDrive.

Note: OneDrive Procedure attached as an appendix to this policy.
3. General Manager/Dispatcher ensures that safety items in MV vehicles are immediately replaced/recharged prior to next dispatch: Incident Reporting Packet with

color disposable flash camera, fire extinguisher, 3 bi-directional emergency reflective triangles, etc.

12. Loss Handling:

- a. MV Risk Management directs loss handling. General Managers ensure that all losses are immediately and properly reported. MV Risk Management or MV's Third-Party Claims Administrator initiates all claim filings. Except for thefts, break-ins, and stolen vehicles, General Managers shall not file reports or other information with local, state or federal authorities.
- b. Whenever there is any possibility of serious liability, the General Manager:
 - 1. Sends complete maintenance file on the vehicle to MV Risk Management
 - 2. Sends Operator's logs/time sheets to MV Risk Management
 - 3. Prints electronic control module data (if applicable) and sends to MV Risk Management
 - 4. Risk Management ensures Drive Cam event (if applicable) is obtained

13. Damaged Equipment:

- A. **Probable Total Losses:** General Manager obtains repair estimate and scans and e-mails it to claims@mvtransit.com.
 - 1. If unable to e-mail, fax to **(214) 646-1858**. MV Risk Management contacts Fixed Assets and determines if MV vehicle is a total loss.
 - 2. If MV vehicle is deemed a total loss, General Manager has any valuable/usable parts removed and then obtains salvage bids.
 - 3. General Manager obtains approval from MV Risk Management before selling salvage.
 - 4. General Manager processes Fixed Asset Action Form and forwards for required approvals.
 - 5. When General Manager receives salvage proceeds, General Manager faxes copy of check to MV Risk Management and forwards check to Accounts Receivable utilizing the applicable MV Lockbox Remittance Form.

B. **Repairable Losses:** General Manager contacts Maintenance Manager. Maintenance Manager authorizes and controls all repairs following maintenance protocols.

MV Risk Management distributes weekly reports that include its internal claim number for the damaged or total loss vehicle.

General Manager approves all MV vehicle repair invoices. General Manager codes vehicle repair invoices to **GL#7090 or GL#6150**. General Manager forwards approved and coded MV vehicle repair invoices to Accounts Payable.

C. The following information explains what GL code to assign and what additional information will be required to avoid delaying payment.

1. **7090 Collision** – This GL number should be used for all MV vehicle repairs made and/or parts purchased due to some type of collision. The MV Risk Management internal claim number is required to be on each invoice that is assigned this GL number. Failure to provide the claim number will prevent Risk Management from approving the invoice for payment and will delay timely payment to the vendor.
2. **6150 Outside Services** – This GL number should be used for all MV vehicle body repairs made and/or parts purchased due to wear and tear over time. Examples would be rusted areas and faded paint. Repairs made to a vehicle that was purchased with pre-existing damage can also be coded to this GL number. An explanation will be required for each vehicle body repair invoice that is coded to this GL number. **Invoices coded “6150” do not require a MV Risk Management internal claim number.**

D. MV vehicle repairs (MV Damage):

Effective 1/1/08, the division is responsible for the full amount of the repairs. These invoices must be approved for payment by Risk Management.

E. MV Damage Subrogation:

If it is possible that MV can collect for damages caused by a responsible third party, General Manager scans and e-mails all information related to the incident to

claims@mvtransit.com. If unable to e-mail, fax to **(214) 646-1858**.

1. Obtain a repair estimate and submit the estimate and photographs of the damage to Risk Management. These items will be used as documentation for MV's subrogation demand.
2. In addition to the damages, MV Risk Management will also attempt to collect "loss of use" from the responsible third party.
3. MV Risk Management compiles a formal claim for damages for submission to the responsible party. MV Risk Management follows up on collection. Damages and/or loss of use recovered through subrogation efforts will be credited to the division.
4. If an insurance company or its representative requests repair cost information, General Manager refers that person to MV Risk Management. *Do not release cost information.*

14. Alleged Equipment/Maintenance Failure:

Claims of equipment or maintenance failure are always referred to as "alleged" failure until an inspection of suspect systems by qualified personnel verifies or denies such claims. The following steps are followed in instances of alleged equipment or maintenance failure:

1. If Operator alleges a failure, contact MV Risk Management immediately.
2. Arrange to have vehicle towed to nearest MV division or area where vehicle can be secured. Do not let vehicle be driven.
3. Secure vehicle. Don't let anyone tamper with vehicle, including MV personnel.
4. Call MV Risk Management to direct investigation activity.
5. MV Risk Management will set up inspection with manufacturer's representative, expert (if applicable), and MV personnel.
6. Notify and coordinate inspection with field personnel.
7. Assist in the inspection of vehicle at formal inspection.
8. Send complete maintenance file on vehicle to MV Risk Management.
9. Send Operator's logs/time sheets to MV Risk Management.
10. Print electronic control module data and send to MV Risk Management.
11. Risk Management ensures Drive Cam event (if applicable) is obtained.

15. Stolen MV Vehicle.

- A. General Manager/Dispatcher immediately reports loss to MV Risk Management.
- B. General Manager/Dispatcher immediately reports the loss to local police authorities. Direct the police authorities to enter the stolen vehicle on the NCIC. Note: If vehicle is ultimately recovered, General Manager/Dispatcher immediately reports recovery to local police authorities, and directs them to remove from the NCIC; and General Manager/Dispatcher immediately reports recovery to MV Risk Management.
- C. General Manager obtains a copy of police report and faxes it to MV Risk Management.
- D. Instruct MV Operators on the following: a) If anyone tries to take a vehicle, let them have it. Do not get into an altercation with them. b) If a vehicle is taken or is missing, immediately phone MV Risk Management.

c) Report any suspicious activity to General Manager/Dispatcher.

E. Depending on the circumstances regarding the missing vehicle, MV Risk Management may notify FBI, appropriate state Highway Patrol, FTA, and Federal DOT.

16. Break-Ins and other Property Losses.

A. General Manager/Dispatcher immediately reports loss to MV Risk Management.

B. General Manager/Dispatcher immediately reports loss to local police authorities.

C. General Manager obtains a copy of police report and faxes it to MV Risk Management.

17. Post-Loss Procedures, Reports, and Correspondence.

A. General Manager forwards all correspondence relating to an incident/loss to MV Risk Management. General Manager identifies the correspondence to MV Risk Management by indicating the Operator's name and the date of the loss.

B. If lawsuit papers are received, General Manager immediately telephones MV Risk Management at (866) 665-1426. General Manager forwards the papers via overnight mail to: EVP, c/o MV Risk Management, 2024 College Street, Elk Horn, IA 51531, with a memo stating the person served and the date and time of service. The EVP of Risk Management can also be reached by telephone at (712) 764-3720.

18. Post-Accident Alcohol and Controlled Substances Testing

a. **Fatal Accidents:** As soon as practicable following an accident involving the loss of human life, an employer shall conduct drug and alcohol tests on each surviving covered employee operating the transit vehicle at the time of the accident. The employer shall also drug and alcohol test any other covered employee whose performance could have

contributed to the accident, as determined by the employer using the best information available at the time of the decision.

- b. **Non-Fatal Accidents:** As soon as practicable following an accident not involving the loss of human life in which a transit vehicle is involved, the employer shall drug and alcohol test each covered employee operating the transit vehicle at the time of the accident unless the employer determines, using the best information available at the time of the decision, that the covered employee's performance can be completely discounted as a contributing factor to the accident. The employer shall also drug and alcohol test any other covered employee whose performance could have contributed to the accident, as determined by the employer using the best information available at the time of the decision.
- c. **"Accident" Definition:** "Accident" means an occurrence associated with the operation of a vehicle (including operation of its lift), if as a result:
- A Fatality; or
 - An individual suffers bodily injury and immediately receives medical attention away from the scene of the accident; or
 - With respect to an occurrence in which the transit vehicle involved is a bus, electric bus, van, or automobile, one or more vehicles (including non-FTA funded vehicles) incurs disabling damage as the result of the occurrence and such vehicle or vehicles are transported away from the scene by a tow truck or other vehicle; or
 - with respect to an occurrence in which the transit vehicle involved is a rail car, trolley car, trolley bus, or vessel, the transit vehicle is removed from operation.
- d. **MV Division Management coordinates/arranges post-accident testing.** If reasonable suspicion is suspected, all reasonable suspicion testing guidelines will be followed.
- e. **Test Results Obtained.** Test results are obtained by Elk Horn Qualification and reported to MV Division Management, or vice versa. General Manager

	contacts MV Management concerning disposition of Operator.	
Effective Date		
Review Date		
RELATED TOPICS		
FORMS		
BRIDGES ENDORSEMENT		Date:
APPROVED BY		Date:

		MV Safety OneDrive Upload Procedures	
Distribution:		Safety Managers	
Category:		OneDrive	Section No.:
Author	By:	Shane Shelton	Approval
	Date:	8/16/2016	By:
Email:		Shane.shelton@mvtransit.com	Status:
Revision Date:		8/18/2016	(active, inactive, pending) PENDING

PLEASE NOTE: Any changes to this document will require manager-level approval

1.0 PURPOSE:

To give safety manager instructions on how to upload videos, photos and documents to the Claims Department via Microsoft OneDrive

2.0 RESPONSIBLE PARTIES:

MV Infrastructure Team

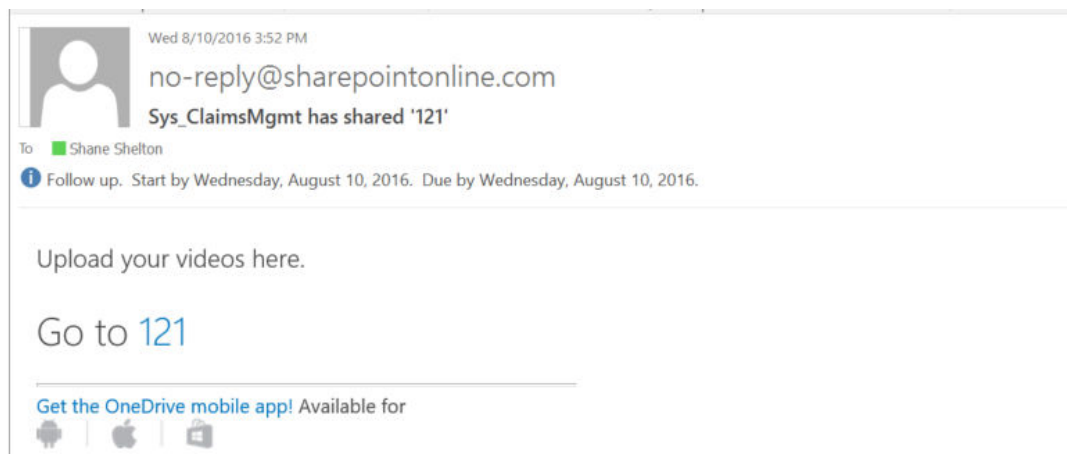
3.0 PROCEDURE INFORMATION:

User Provisioning (for the Claims Team Only):

1. The IT Infrastructure team will get a ticket from the Auto Claims Manager requesting that a user be given access to a divisional folder via the Help Desk.
2. The user will be provisioned according to the tickets directions.
3. The same process will be used for user moves and deletions.

End User Access Instructions:

1. Upon successful provisioning of the end user's account, the end user will receive an email from no-reply@sharepointonline.com with the Subject of "Sys_ClaimsMgmt has shared 'Division Number'"



2. The end user can click the "Division Number" hyperlink in the email body to go to the One Drive Login page. The example above shows you'd click the blue "121" number in the body of the email for Division 121.
3. This will take you to a sign-on page with your default browser. MV IT recommends you use Internet Explorer or Google Chrome of the best results.



Work or school, or personal Microsoft account

Keep me signed in

Sign in

[Can't access your account?](#)

Don't have an account assigned by your work or school?

[Sign in with a Microsoft account](#)

4. To sign in, use your MV Transportation email address: firstname.lastname@mvtransit.com. If your name is John Doe, your email will be john.doe@mvtransit.com. Once you've entered your email address into the email field, your browser will redirect you to the MV Transportation Office 365 login page as seen below.



Sign in with your organizational account

shane.shelton@mvtransit.com

Password

Sign in

5. Your email address will already be populated, just enter your domain password. This is the same password you use to log into your MV desktop or laptop. Click Sign in.
6. This will then take you to the OneDrive folder you have access to. You will notice if you click outside of your folder, you will receive access denied messages. You will **ONLY** have access to the division you were assigned by the Auto Claims Manager.

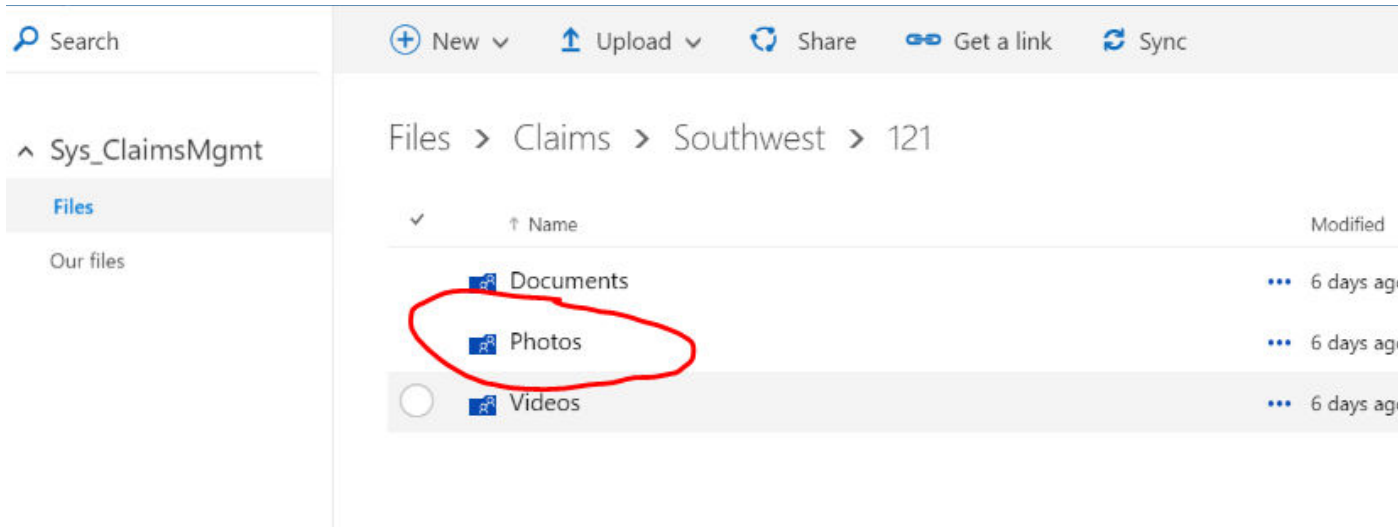
The screenshot shows a web browser window with the URL https://mvtransit-my.sharepoint.com/personal/sys_claims_mgmt_mvtransit_onmicrosoft_com/_layouts/15/onedrive.aspx?e=5%3ae1d00f9d73cb459b9774ac370f5e. The browser tabs include 'MV', 'Misc', 'Personal', 'APC Management Ca', and 'Authenticating APC N'. The page title is 'Office 365 OneDrive'. The interface shows a search bar, navigation options (New, Upload, Share, Get a link, Sync), and a breadcrumb path: 'Files > Claims > Southwest > 121'. A table lists files with columns for Name, Modified, Modified By, File Size, and Sharing. The files listed are Documents, Photos, and Videos, all modified 6 days ago by Sys_ClaimsMgmt. A 'Drag files here to upload' prompt is visible at the bottom of the file list.

Name	Modified	Modified By	File Size	Sharing
Documents	6 days ago	Sys_ClaimsMgmt		Shared
Photos	6 days ago	Sys_ClaimsMgmt		Shared
Videos	6 days ago	Sys_ClaimsMgmt		Shared

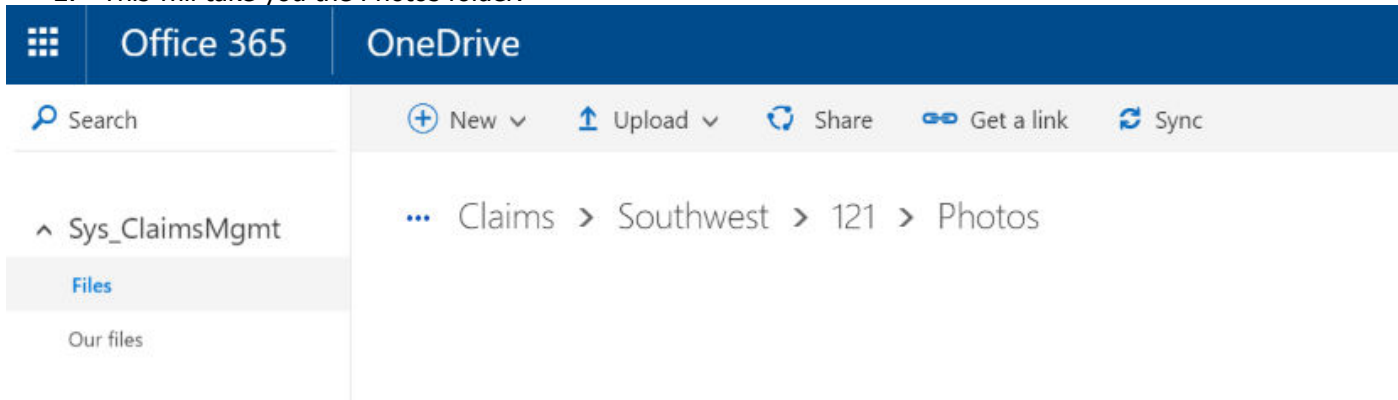
7. From here you can open the folders you would need to upload into. Further instructions on uploading files are below. You can bookmark the page you accessed in step 6 to streamline logging in the future.

Uploading Files:

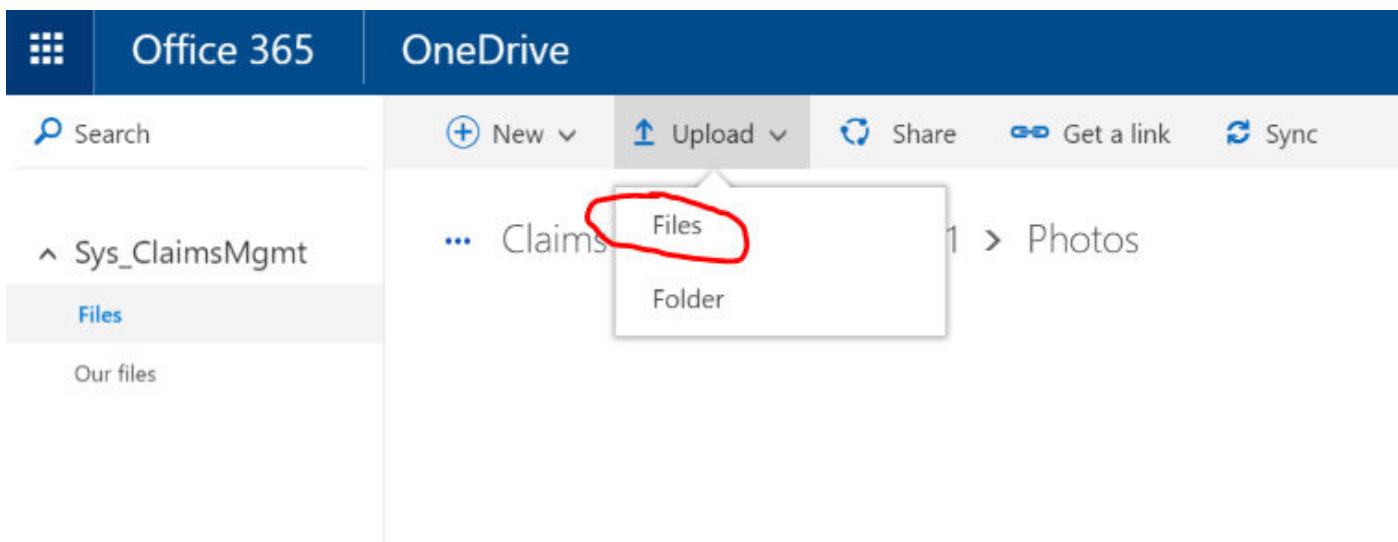
1. Once you've completed Steps 1 – 7 above under the "End User Access Instructions", you can now start to upload files. To do so, click the folder you want to upload to (in this example we'll use a photo upload). Click on the Photos Folder.



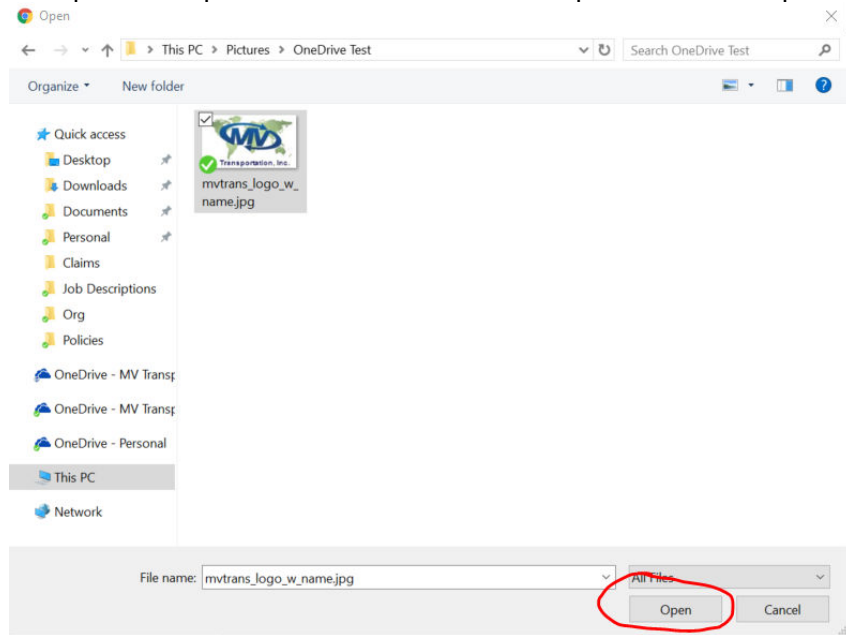
2. This will take you the Photos folder.



3. To upload a photo, click Upload -> Files



4. Browse to the location on your computer of the file you want to upload. In this example, we are uploading the one MV logo picture. Click on the file(s) you want to upload, you can upload multiple if need be at a time. Click Open to start the upload.



5. Your file will then upload into the folder you were in before you clicked the Upload -> Files button in step 3. We were in the Photos folder in this example, so the file uploaded into the Photos folder. If you want to upload a Video, start from the Videos folder and the same for the Documents folder.
6. That's it. You've now uploaded a file to Claims for review.

Labeling Uploaded Documents to OneDrive:

Please prefix all documents uploaded into OneDrive with the following coding. Please note that all photos need to be saved on a Word document. Then uploaded to OneDrive with the proper label; Pic – M16XXXX or Pic – "Ref Number". The MV claimant number is provided on the Daily Incident Report or Weekly Incident Report.

1. Division Reports – DR-M166403 or DR-CG122
2. Police Report – PR-M166403 or PR-CG122
3. Photos – Pic-M166403 or Pic-CG122
4. Estimate – Est-M166403 or Est-CG122
5. Letter – Ltr-M166403 or Ltr – CG122
6. Video – Video-M166403 or Video-CG122
7. Invoice – Inv-M166403 or Inv-CG122
8. Tender – Tender-M166403 or Tender-CG122

4.0 REFERENCE DOCUMENTATION:

"MV" is to be understood as MV Transportation and/or its affiliated companies (collectively "Company").

5.0 DOCUMENT CHANGE LOG:

Version	Date	Author	Change Description
1.0	8/16/2016	Shane Shelton	Original draft
1.1	8/18/2016	Shane Shelton	Added Coding
1.2	12/20/2016	Shane Shelton	Added photo saving wording under labeling

MV TRANSPORTATION, INC. CORPORATE POLICY STATEMENT

General policies of MV Transportation, Inc. are issued from time to time and are designed to provide direction to company managers in the conduct of the business. Policies may, from time to time, become dated or may no longer apply. In the event of questions, the policy should be referred to the General Counsel for interpretation. In the event a policy conflicts with the law, regulation or the terms of a contract with a customer, the policy will be subordinate to such law, regulation or contract term. Policies are only effective on the approval of the Chief Executive Officer, and the endorsement of the Bridges Committee.

Policy #	Safety Policy S-37
SUBJECT	New Driver Assessment / Validation
POLICY	<p>SCOPE: This policy applies to all employees of MV Transportation, Inc. who operate buses or other revenue vehicles.</p> <p>PURPOSE: To ensure new drivers are operating their vehicles in accordance with MV's standards of safe driving performance</p> <p>POLICY: It is the policy of the Company that all new driver hires shall receive a formal and thorough evaluation of their driving skills and a safety performance review/assessment at 45 days and 75 days from their date of hire.</p> <p>PROCEDURES:</p> <ol style="list-style-type: none">1. Complete a SF-3 (Driver Safety Profile and Record Summary) Form for each new driver in advance of the meeting with the driver.2. Review DriveCam history/trends and overall safety record, in detail, with driver. Identify areas of "need improvement" or "good performance".3. Conduct a thorough "Road Test" on each new driver and document on Form SF-1. Road Test shall be conducted by a certified BTW or other qualified individual (BTW is preferred).4. The intent of the road test is to verify that the driver is operating the vehicle in accordance with our safe-driving performance standards (the standards taught in the driver training school and outlined in both the Student Guide and BTW manual).5. Should the record review or the Road Test indicate areas of weakness and the need for additional training, the driver shall be scheduled for a full refresher training session addressing these areas within 10 days of this 45/75 day review.6. Should a driver "fail" his/her "75-day" assessment, the Division General Manager, in coordination with the Area Safety Director, shall make a decision whether to retain and retrain the driver or take other administrative actions, up to and including separation from the Company. <p>These formal driver skills assessments shall be performed at the 45 day and 75 day timeframe. <u>Note: It is critical that this final "75 day" assessment be completed before the end of the driver's "90 day probationary" period.</u></p>

	<p>The intent of the process is to ensure all new drivers properly apply and execute the defensive driving standards they were taught in their Driver Training School courses and apply them properly during the course of their work.</p> <p>Any exception to this policy must be approved by both the Regional Vice President and the VP of Safety for the division. The Sr. VP of Safety shall be the final decision maker in cases of non-concurrence.</p>	
Effective Date	July 1, 2010	
Review Date		
RELATED TOPICS		
FORMS		
BRIDGES ENDORSEMENT	Jack Hempstead	Date:5/7/10
APPROVED BY	Kevin Klika	Date: 6/23/10

MV TRANSPORTATION, INC. CORPORATE POLICY STATEMENT

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Policy #	Safety Policy S-39
SUBJECT	Location Safety Committees
SCOPE:	This policy shall apply to all operating divisions and facilities of the Company with more than 10 employees
POLICY	<p>A Location Safety Committee (LSC) will be required and established at each division facility with more than 10 employees. Safety committees are not only a proven best safety practice, but are also required by State and Federal regulations.</p> <p>The primary function of the committee is to work as a team in creating and maintaining a safe work environment for fellow employees and helping with system safety and security at the division. The LSC is also responsible hazard reduction and hazard resolution.</p> <p>Committee Members: The LSC shall be headed by either the Division's General Manager or Safety Manager and should be made up in equal numbers of member of management and hourly staff. A committee should not exceed 10 members.</p> <p>An example of a LSC membership is below:</p> <ul style="list-style-type: none"> • General Manager • Safety Manager • Staff Person (Assistant Manager, Clerk, Dispatcher, etc.) • Maintenance representative (required if maintenance performed at division) • Drivers representatives (number of drivers should not exceed one driver per 25 vehicles) <p>It is recommended that staff and maintenance members</p>

of the review board voluntarily serve one-year terms commensurate with the MV Transportation budget year. However, the General Manager and the Safety Manager are required positions on the committee.

Meetings: It is recommended that the Manager leading committee meetings establish the appropriate time and frequency for Safety committee meetings to fit the schedules and needs of the division. The committee should meet once a month at a minimum however less frequent meetings (i.e.: bi-monthly or quarterly) are allowed for divisions with less than 20 employees. At locations where vehicle incidents or workers' compensation frequency is high, the committee should meet more often than the minimum requirements (i.e.: bi-weekly). Agenda topics should include review of unsafe acts or conditions found at the facility, a review of DriveCam trends and most frequent violations, a review of incidents or "near misses" involving vehicle operations, equipment or employee injuries, as well as a review of old and new business.

LSC Committee activities: The committee should provide input/ideas to ensure a safe work environment is established and maintained. Employees exhibiting safe work habits will be identified and reported to the committee. The committee will determine the manner in which safe practices or behavior should be recognized at the facility. All unsafe conditions will be reported to the manager/supervisor and the committee will determine or recommend remedial/corrective action. The committee will encourage fellow employees to work in a safe manner, provide input/ideas for safety posters/messages at the workplace, and promote a safe work environment through input/ideas for safety topics at monthly safety meetings.

Other specific safety and security-related tasks of the LSC are as follows:

- Coordinate safety activities of the division.
- Meet to evaluate and resolve safety issues at the division level.
- Conduct special meetings as necessary at the request of Management.
- Compile pertinent location safety data to identify and assess operational risk.
- Review DriveCam trends and pertinent events/clips

	<ul style="list-style-type: none"> • Review repeater trends/behavior and determine appropriate countermeasures to improve driving behaviors. • Perform analyses to identify safety problems related to maintenance activities. • Use Committee consensus to develop hazard resolutions. • Review facility action plan for currency • Coordinate and plan at least one annual emergency preparedness and fire drill. 	
Effective Date		
Review Date		
RELATED TOPICS		
FORMS		
BRIDGES ENDORSEMENT		Date:
APPROVED BY		Date:



LOCATION: 581 CORONA	DATE:
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SAFETY MANAGEMENT PRACTICES	Yes	No	N/A	Comments
Maintains MVT standardized Accident Log updated and current				
Performs New Hires 45/75 day assessments as required				
Division's instructors (class and BTW) are properly ICP certified				
Division utilizes the standard MVT training program (AVATAR)				
Division follows minimum training program requirements (hours, protocols, materials, etc.)				
Division manages DriveCam Program per DC Program Management Plan				
> # Vehicles Out Of Service				
> # Vehicles Overdue for Download				
> # DC events overdue for coaching/retraining				
Division follows disciplinary requirements outlined in Handbook/CBA				
Safety Meetings attendance tracked and documented on Form SF-6 and filed				
Drivers retrained per Safety Retraining Policy (Policy #12)				
Exterior				
Are exterior lights functioning properly?				
Landscaping well maintained				
Trash not overflowing from dumpster				
Park lot free of debris				
Park lot in good repair and free of trip hazards				
Building and fencing free of graffiti				
Does fuel island have spill kit (if applicable)				
Is fuel island free of leaks (if applicable)				
Fuel hose hung properly (if applicable)				
Fuel nozzle trigger lock removed (if applicable)				
Vehicles				
Exterior of vehicle clean (wheels, windows ect)				
Interior free of trash, debris and graffiti				
DVIs properly filled out				
Current insurance and registration located in vehicle				
Maintenance Area				
Is Facility clean?				
Is the maintenance floor clear of free oil spills or slick spots?				
Are maintenance personnel wearing safety glasses?				
Is proper footwear being worn?				
Are all machinery fitted with proper guards?				
Electrical cords intact and free of cuts/repair?				
Electrical Panels / Breaker Boxes have unobstructed access				
Electrical Panels / Breaker Boxes have not been modified and have no uncovered openings.				
Inventory stored properly and organized				
Are hoses rolled up when not in use?				
Are Lockout/Tagout procedures in place?				
Is waste area clean and orderly?				
Are aerosol cans stored in fire proof cabinets?				
Are oily rags disposed of in their proper container (covered metal waste cans)?				
Are safety glasses for visitors provided in accessible an area?				
Are all facility/shop lights operational and functional?				
Are exits properly marked?				
Is first aid kit properly stocked?				
Eyewash installed and inspected monthly				
Electrical panel area free of clutter (3x3)				
Are facility / shop areas free of "trip & falls" hazards?				
Are all storage drums covered and labeled?				
Are all air / water hoses clean, free of defects and properly stored?				
Are all drop lights clean, serviceable, and properly stored?				

Maintenance Area				
Is signage permanently mounted?				
Are locker room floors free of debris and uniforms?				
Are there accurate "Days without an Injury" and "Days without Incident" signs posted?				
Is proper personal protective equipment (PPE) used by employees in the shop areas?				
Tools and Equipment				
Jack stand in good condition				
Jack stand being used when applicable				
Tires and wheels secure				
Batteries secured and stored with secondary containment				
Vehicle lifts in good condition				
Vehicle wash area clean and organized				
Water hoses rolled up when not in use (wash area)				
Pit area clean and organized (where applicable)				
Are fire extinguishers inspected monthly basis				
Appropriate signs posted for PPE, fire ext. restricted area ect				
Office Administrative Areas				
Are floor clean and free of clutter?				
Are exits properly marked?				
Electrical cords not daisy chained?				
Restrooms clean and sanitary?				
Are restrooms clean, orderly, and stocked?				
Plumbing fixtures functioning properly				
Tables and chairs serviceable, functional and free of hazards?				
Driver bulletin board current not cluttered				
Is all necessary signage required by customer, local, state or federal regulations posted?				
Are evacuation maps posted in conspicuous area?				
Are employees aware of designated assembly?				
Are stairwells and stairways clear with serviceable handrails & treads				
OSHA 300 log up to date (includes light duty report).				
Site Specific Equipment/Areas				
Site Inspected by:				
General Manager's Name (Print):				
General Manager's Signature:			Date:	
Safety Inspection Comments / Remediation action(s) taken:				



Driver Skills Evaluation and Refresher Training Form

Driver Name (print):		Employee Number:	Start Time:	Date of Accident/Incident:
			Stop Time:	
Reason for Refresher (Check one)	Post Accident	Road Check	Division Name & Div. #	Date of Refresher:
	Return to Work	45/90 Day Follow up (New Hires)		Instructor Name (print):
	Drive Cam	Other:		
Driver License #	CDL (Y/N)	Class	State	Expiration Date
D.O.T. Medical Card Exp. Date			Vehicle / Bus Type & Model	
S = Satisfactory U = Unsatisfactory N/A = Strike through boxes				

Pre-Trip/Post	S	U	Intersections	S	U	Backing	S	U	Look Around	S	U
DVI	<input type="checkbox"/>	<input type="checkbox"/>	Mirror Use	<input type="checkbox"/>	<input type="checkbox"/>	Mirror Use	<input type="checkbox"/>	<input type="checkbox"/>	Observes Speed Limit	<input type="checkbox"/>	<input type="checkbox"/>
Interior	<input type="checkbox"/>	<input type="checkbox"/>	Turn Signal Use	<input type="checkbox"/>	<input type="checkbox"/>	Activate 4-Way Flasher	<input type="checkbox"/>	<input type="checkbox"/>	Speed for Conditions	<input type="checkbox"/>	<input type="checkbox"/>
Brake Check	<input type="checkbox"/>	<input type="checkbox"/>	Approach/Lane Position	<input type="checkbox"/>	<input type="checkbox"/>	Use Horn - 2 X Prior	<input type="checkbox"/>	<input type="checkbox"/>	Takes in Whole Scene	<input type="checkbox"/>	<input type="checkbox"/>
Exterior	<input type="checkbox"/>	<input type="checkbox"/>	Speed on Approach	<input type="checkbox"/>	<input type="checkbox"/>	Utilizes Assistance	<input type="checkbox"/>	<input type="checkbox"/>	Aware of Hazards	<input type="checkbox"/>	<input type="checkbox"/>
Emergency Equipment	<input type="checkbox"/>	<input type="checkbox"/>	Blocks Turns	<input type="checkbox"/>	<input type="checkbox"/>	Checks for Obstacles/ Walk Around	<input type="checkbox"/>	<input type="checkbox"/>	Obeys Signs/Signals	<input type="checkbox"/>	<input type="checkbox"/>
Mirrors/Glass	<input type="checkbox"/>	<input type="checkbox"/>	Pedestrian Awareness	<input type="checkbox"/>	<input type="checkbox"/>	Backs Only When Necessary	<input type="checkbox"/>	<input type="checkbox"/>	Yields Right of Way/Ped.	<input type="checkbox"/>	<input type="checkbox"/>
Lights	<input type="checkbox"/>	<input type="checkbox"/>	Left Turns	<input type="checkbox"/>	<input type="checkbox"/>	Straight Line Backing	<input type="checkbox"/>	<input type="checkbox"/>	Checks Mirrors Prior and After	<input type="checkbox"/>	<input type="checkbox"/>
Gauges / Horn	<input type="checkbox"/>	<input type="checkbox"/>	Right Turns	<input type="checkbox"/>	<input type="checkbox"/>	Leave Room	<input type="checkbox"/>	<input type="checkbox"/>	Checks Restricted Vision Areas/Off Track	<input type="checkbox"/>	<input type="checkbox"/>
Tires	<input type="checkbox"/>	<input type="checkbox"/>	Mirror Scan	<input type="checkbox"/>	<input type="checkbox"/>		Observes Speed Limit	<input type="checkbox"/>	<input type="checkbox"/>	Utilizes Reference Points	<input type="checkbox"/>
Oil Leaks	<input type="checkbox"/>	<input type="checkbox"/>	Points Out Hazards	<input type="checkbox"/>	<input type="checkbox"/>	Ensure Space Cushion	<input type="checkbox"/>	<input type="checkbox"/>	"Rock and Roll" at turns	<input type="checkbox"/>	<input type="checkbox"/>
Seats	<input type="checkbox"/>	<input type="checkbox"/>	Covers Brakes	<input type="checkbox"/>	<input type="checkbox"/>	Not Aggressive in Traffic	<input type="checkbox"/>	<input type="checkbox"/>	Intersections - pauses 3 seconds before moving	<input type="checkbox"/>	<input type="checkbox"/>
Wheelchair Secur'm't	<input type="checkbox"/>	<input type="checkbox"/>	Checks Left-Right-Left	<input type="checkbox"/>	<input type="checkbox"/>	Stopping Distance, Judge	<input type="checkbox"/>	<input type="checkbox"/>	Pedestrian Awareness	<input type="checkbox"/>	<input type="checkbox"/>
			Proper distance from curb	<input type="checkbox"/>	<input type="checkbox"/>	Maintains Lane Positions	<input type="checkbox"/>	<input type="checkbox"/>	Other Motorists/Veh	<input type="checkbox"/>	<input type="checkbox"/>
Equipment Usage			Railroad Crossing						Other		
Brakes	<input type="checkbox"/>	<input type="checkbox"/>	*Activates 4-Way Flasher	<input type="checkbox"/>	<input type="checkbox"/>	Smooth Starts/Stops	<input type="checkbox"/>	<input type="checkbox"/>	Bicyclists / Pedestrians	<input type="checkbox"/>	<input type="checkbox"/>
4-Way Flashers	<input type="checkbox"/>	<input type="checkbox"/>	Open Side Window	<input type="checkbox"/>	<input type="checkbox"/>	Covers Brake	<input type="checkbox"/>	<input type="checkbox"/>	Eyes/Head Moving	<input type="checkbox"/>	<input type="checkbox"/>
Headlights On	<input type="checkbox"/>	<input type="checkbox"/>	Stops 15'-50' from Tracks	<input type="checkbox"/>	<input type="checkbox"/>	Passing	<input type="checkbox"/>	<input type="checkbox"/>	Checks Mirrors During Survey/Scan While	<input type="checkbox"/>	<input type="checkbox"/>
Parking Brake Application and Release	<input type="checkbox"/>	<input type="checkbox"/>	Looks & Listens	<input type="checkbox"/>	<input type="checkbox"/>	Initial Brake Depression	<input type="checkbox"/>	<input type="checkbox"/>	Survey/Scan After	<input type="checkbox"/>	<input type="checkbox"/>
Mirror(s) Adjustment	<input type="checkbox"/>	<input type="checkbox"/>	Plans Ahead	<input type="checkbox"/>	<input type="checkbox"/>	Ensures Clearance/ Tailswing	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Seat Belt	<input type="checkbox"/>	<input type="checkbox"/>	Merges into Traffic	<input type="checkbox"/>	<input type="checkbox"/>	Adjusts Driving for Night/ Restricted Vision	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Steering Wheel (Push-Pull)	<input type="checkbox"/>	<input type="checkbox"/>	Communicate			Safe Lane Changes	<input type="checkbox"/>	<input type="checkbox"/>	Wheelchair 4 pt. Tie Down	<input type="checkbox"/>	<input type="checkbox"/>
Signal Lights	<input type="checkbox"/>	<input type="checkbox"/>	Smooth Maneuver/Merge	<input type="checkbox"/>	<input type="checkbox"/>	Look Ahead	<input type="checkbox"/>	<input type="checkbox"/>	Passenger Lap Belt	<input type="checkbox"/>	<input type="checkbox"/>
Transmission	<input type="checkbox"/>	<input type="checkbox"/>	Signals Properly	<input type="checkbox"/>	<input type="checkbox"/>		Survey/Scan Far Ahead	<input type="checkbox"/>	<input type="checkbox"/>	Proper Fare Handling	<input type="checkbox"/>
*Use only when applicable	<input type="checkbox"/>	<input type="checkbox"/>	Communication	<input type="checkbox"/>	<input type="checkbox"/>	Choice of Lane	<input type="checkbox"/>	<input type="checkbox"/>	Driver appearance	<input type="checkbox"/>	<input type="checkbox"/>
Use of Controls	<input type="checkbox"/>	<input type="checkbox"/>	Use of Horn	<input type="checkbox"/>	<input type="checkbox"/>	Anticipates Conflicts	<input type="checkbox"/>	<input type="checkbox"/>	Professional manner	<input type="checkbox"/>	<input type="checkbox"/>
General											
Log Procedures	<input type="checkbox"/>	<input type="checkbox"/>									
Accident Procedures	<input type="checkbox"/>	<input type="checkbox"/>									

Driver Signature: _____ Instructor Signature: _____

Comments: _____

Safety Modules / DVDs Shown:	<input type="checkbox"/>	Basics of Safety	<input type="checkbox"/>	Intersections	<input type="checkbox"/>	Accident/Emergency Procedure
	<input type="checkbox"/>	LLLC	<input type="checkbox"/>	Merging/Lane Change/Passing	<input type="checkbox"/>	Adverse Weather/Spec. Cond'ns
	<input type="checkbox"/>	Following Distance	<input type="checkbox"/>	Fatigue Management	<input type="checkbox"/>	Wheelchair Securement
	<input type="checkbox"/>	Backing Basics	<input type="checkbox"/>	Pedestrians/Bicycle Aware	<input type="checkbox"/>	Other:

Bus Driver Annual Evaluation Form

Bus Driver Information

Driver's Name		Evaluator	
Corona (CCTS)		Date	
Type of Evaluation	Check One: Announced <input type="checkbox"/> or Unannounced <input type="checkbox"/> Check One: Annual <input type="checkbox"/> or Ride-Along <input type="checkbox"/> or Follow <input type="checkbox"/> or with mystery evaluator <input type="checkbox"/>	Year	

Ratings

	Meets Expectations	Needs Improvement	N/A
1. Operates buses and vehicles in a safe and efficient manner at all times, including safe backing procedures.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
2. Obeys traffic laws including, but not limited to, using driver seat belt, obeying the speed limit, stopping at stop signs/lights, using turn signals and lights appropriately, and maintaining proper following distance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
3. Crosses railroad tracks in accordance with the law and local procedure.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
4. Uses proper loading/unloading procedures in accordance with local procedure, and clearly communicates loading/unloading expectations and procedures to students (including correct 8-way lights and stop arm use).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
5. Adheres to the dress code including proper footwear in accordance to local policy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
6. Understands and abides by laws and local policies concerning visual, manual, and mental distracted driving.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
7. Reports all accidents and completes required duties and paperwork in accordance with local policy/procedure.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
8. Adheres to laws and local procedures regarding transporting only authorized riders, and riders exiting a stop other than their regular designated stop.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			

9. Establishes and maintains a positive rapport with passenger/rider.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
10. Clearly and politely communicates rules/procedures/expectations to passengers/riders.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
11. Uses preventative measures to avoid misbehavior, and enforces rules. Addresses and ignores behaviors with good judgment. Addresses individual or group with good judgment. De-escalates situations by “picking battles” appropriately, speaking firmly/calmly, referring misbehaviors back to rules/procedures, and using an appropriate level of response.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
12. Assigns seats in accordance with local policy/procedure/supervisor suggestions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
13. Maintains an acceptable attendance record in accordance to supervisor standards. Gives appropriate notice of requested leave and sub driver. Follows the regular route schedule as rigidly as conditions permit.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
14. Participates in evacuation drills (minimum of 2 a year).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
15. Meets deadlines for paperwork (timesheets, route sheets, bus rolls, etc.) Willingly and actively participates in meetings and trainings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
16. Maintains bus cleanliness in accordance to local policy/procedure. This includes ensuring the dash, aisle, floor, steps, emergency exit pathways, windows, and mirrors are clean and clear.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			
17. Conducts and documents pre/post-trip assessments as required by law and local policy/procedure. Submits bus maintenance work orders appropriately in a timely manner. Maintains proper mirror positioning.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Comments:</i>			

18. Appropriately uses 2-way radio (or other form of communication) in accordance with local policy/procedure to communicate with schools, dispatch, and other drivers. All communication should meet the standard for professionalism and customer service.

Comments:

19. Documents passenger/rider, or student misbehavior and incidents appropriately, and follows through with bus incident report forms when necessary.

Comments:

20. Ensures all necessary emergency policy, accident/incident forms, , bus work order forms, and emergency supplies (fire extinguisher, first aid kit, biohazard/liquids kit, safety reflectors) are kept up to date and on the bus per laws and local policy/procedure.

Comments:

Evaluation

ADDITIONAL COMMENTS

PROGRESS TOWARDS LAST YEAR'S GOALS (IF APPLICABLE)

Check Current Level of Performance:

Exceeds Expectations

Meets Expectations

Still Needs Improvement

List Previous Goal(s) and Evidence/Observations of Progress:

GOAL(S) FOR UPCOMING YEAR (IF NECESSARY):

List Goal(s) for upcoming year:

Verification of Review

By signing this form, you confirm that you have discussed this review in detail with your supervisor. Signing this form does not necessarily indicate that you agree with this evaluation.

Employee Signature

Date

Supervisor Signature

Date



MV Transportation Drug and Alcohol Policy

Issue Date
April 2018

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Drug and Alcohol Testing Core Values

Drug and alcohol abuse are the two most preventable behavioral disorders facing our society today. Drug abuse literally costs hundreds of billions of dollars alone in lost productivity, increased healthcare costs, accidents and theft. It is estimated that drug and alcohol abuse costs over a trillion dollars worldwide and growing.

MV Transportation, Inc. and its Subsidiaries are dedicated to providing safe, dependable, and economical service to its clients. MV Transportation's employees are our most valuable resource. It is our policy (1) to take appropriate action to assure that employees are not impaired in their ability to perform assigned duties in a safe, productive, and healthy manner; (2) to foster and maintain a drug and alcohol - free environment for all employees and patrons; (3) to prohibit the unlawful manufacture, distribution, dispensing, possession, or use of controlled substances; and (4) to encourage employees to voluntarily seek professional assistance whenever personal problems, including alcohol or drug use, may adversely affect their ability to perform their assigned duties.

Drug testing not only saves businesses money, but it also saves lives. This is the backdrop that MV Transportation's Drug and Alcohol Compliance Department works in to promote a safe and ethical drug testing program that will be the standard of the industry. MV Transportation's Compliance Department is always looking for ways to improve the everyday challenges by using state of the art software and easy to follow testing instructions and forms, and a comprehensive collection site inspection tutorial for supervisors.

To achieve these goals and to comply with all applicable Federal regulations governing workplace anti-drug programs in the transit industry, MV Transportation incorporates three integrated components:

- **Prevention through education and training**
- **Detection, deterrence and enforcement**
- **Treatment and opportunities for rehabilitation**

MV's purpose is to assure worker fitness for duty and to protect our employees, passengers, and the public from the risks posed using alcohol and prohibited drugs. MV is surrounded by an extraordinary Board of Directors, Executive Committee and professional staff who support and promote a safe and drug free environment in which we all live and work.

In accordance with the U.S. Department of Transportation and the
Federal Transit Administration Regulations
(49 CFR Parts 40, 655, and 382)
MV TRANSPORTATION, INC.

SUBSTANCE ABUSE POLICY

1.0 Policy

MV Transportation, Inc. and its Subsidiaries (MV Transportation) are dedicated to providing safe, dependable, and economical service to its clients. MV Transportation's employees are our most valuable resource. It is our policy (1) to take appropriate action to assure that employees are not impaired in their ability to perform assigned duties in a safe, productive, and healthy manner; (2) to foster and maintain a drug and alcohol - free environment for all employees and patrons; (3) to prohibit the unlawful manufacture, distribution, dispensation, possession, or use of controlled substances; and (4) to encourage employees to voluntarily seek professional assistance whenever personal problems, including alcohol or drug use, may adversely affect their ability to perform their assigned duties.

To achieve the goal of a substance-free workplace, this policy incorporates three integrated components:

Prevention through education and training:

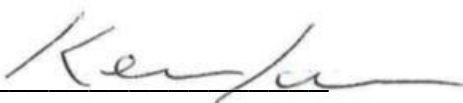
Education and training will communicate and clarify this policy to all employees, assist employees in recognizing substance abuse problems and in finding solutions to those problems.

Detection, deterrence and enforcement:

Federal regulations require that effective January 1, 1995, all safety - sensitive employees will be subject to reasonable suspicion, post accident, random, return to duty and follow up drug and alcohol testing. Applicants for safety sensitive positions will not be eligible for those positions unless they pass a pre-employment drug test. **As a "zero tolerance" employer, any positive drug or alcohol or refusal to tests will result in a termination of employment.**

Treatment and opportunities for rehabilitation:

Alcohol and drug abuse are recognized as diseases that can be treated. MV Transportation promotes a voluntary rehabilitation program to encourage employees to seek professional assistance prior to testing positive for drugs or alcohol, without fear of discipline.

Approved: 

Kevin Jones, CEO
MV Transportation, Inc. and its Subsidiaries

Date: April 1, 2018

2.0 Purpose

The purpose of this policy is to assure worker fitness for duty and to protect our employees, passengers, and the public from the risks posed by the use of alcohol and use of prohibited drugs (as defined below). This policy is also intended to comply with all applicable Federal regulations governing workplace anti-drug programs in the transportation industry.

The Federal Transit Administration (FTA) and the Federal Motor Carrier Safety Administration (FMCSA) of the U.S. Department of Transportation have enacted 49 CFR (Code of Federal Regulations) Parts 655 and 382, which mandate urine drug testing and breath alcohol testing for employees performing safety-sensitive functions. These regulations also prevent performance of safety-sensitive functions when there is a positive test result or a test refusal. The U.S. Department of Transportation (DOT) has also adopted the revised version of 49 CFR Part 40 as amended, which outlines procedures for transportation workplace drug and alcohol testing programs. This Policy incorporates these federal requirements for employees performing safety-sensitive functions, as well as other provisions.

In addition, DOT has published 49 CFR Part 29, 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 FTA. California passed a similar version of the federal law, the Drug-Free Workplace Act of 1990 (Gov't Code § 8350 et seq). This policy reiterates the requirements of the federal regulations; these requirements will be in *Italics*. Portions of this policy marked in **bold** are not necessarily FTA-mandated but reflect MV Transportation employment policy (this does not include policy headings).

If any provision of an existing MVT policy, rule or resolution is inconsistent or in conflict with any provision of this policy or the DOT/FTA rules, this policy and the DOT/ FTA rules shall take precedence; if any provision of this policy is inconsistent or in conflict with the DOT/ FTA rules the DOT/ FTA rules shall take precedence.

3.0 Applicability

3.1 Safety-Sensitive Employees

This policy applies to all safety-sensitive MV Transportation employees, including paid part time employees who perform or could be called upon to perform any transportation related safety-sensitive function, and this includes off-site lunch periods or breaks when an employee is scheduled to return to work.

A safety-sensitive function is any of the following duties:

- 1) The operation of a transportation revenue service vehicle even when the vehicle is not in revenue service.

- 2) The operation of a non-revenue service vehicle by an employee when the operation of such a vehicle requires the driver to hold a Commercial Drivers License (CDL).
- 3) Maintaining (including repairs, overhaul and rebuilding) a revenue service vehicle or equipment used in revenue service.
- 4) Controlling the movement of a revenue service vehicle and
- 5) Carrying a firearm for security purposes. (Not applicable to MVT)
- 6) Volunteers are considered a covered employee if; 1) they are required to hold a commercial driver's license to operate the vehicle; or 2) if the volunteer receives re-numeration in excess of their actual expenses incurred while engaged in the volunteer activity.

(For a description of job categories - See Exhibit B)

3.2 Contractors

Contractors who perform any of the safety-sensitive functions described in this policy for MVT will be subject to the same requirements as safety-sensitive MVT employees.

3.3 Non-Safety Sensitive Positions

All MVT employees are subject to the provisions of the Drug-Free Workplace Act of 1998. Visitors, vendors and contracted employees on MVT premises will not be permitted to conduct transportation business if found to be in violation of this policy.

4.0 Opportunities for Rehabilitation (MVT Policy)

To promote a drug and alcohol-free workplace, this policy includes a rehabilitation program that allows employees to voluntarily come forward to request rehabilitation.

4.1 Voluntary Rehabilitation (MVT Policy)

Any employee who has a drug and/or alcohol abuse problem and has not been selected for reasonable cause, random or post-accident testing or has not refused a drug or alcohol test may voluntarily refer her or himself to the General Manager or the Human Resource Department, who will refer the individual to the company's Employee Assistance Program and/or a Substance Abuse Counselor for a Non-DOT evaluation and treatment. Voluntary self-referral commits the employee to a therapeutic process. Confidentiality of the employee will be protected. The Counselor will evaluate the employee and make a specific recommendation regarding the appropriate treatment. When an employee voluntarily refers her or himself for treatment, the employee may be eligible for sick leave and disability benefits. Employees will be allowed to take accumulated vacation time or may be eligible for unpaid time off to participate in any prescribed rehabilitation program. Employees are encouraged to voluntarily seek professional substance abuse assistance before any substance use or dependence affects job performance.

4.2 While Undergoing Treatment (MVT Policy)

Any covered employee who admits to a drug and/or alcohol problem will immediately be removed from his/her safety-sensitive function and will not be allowed to perform such function until successful completion of a prescribed rehabilitation program is completed. The employee will be placed on an unpaid leave of absence for maximum of 30/60 days to allow time for completion of the treatment/rehabilitation program. Proof of completion must be provided in writing by a valid professional. The employee will be required to pass a Non-DOT drug and alcohol test before he/she can perform a safety-sensitive function.

*MV shall make every effort to place the employee back in his/her position upon returning to work. However, an employee's commitment to undergo rehabilitation treatment does not guarantee that the employee's job will be available upon return.

4.3 Cost of Rehabilitation (MVT Policy)

All associated costs for treatment are the sole responsibility of the employee.

4.4 Returning to Work after Treatment (MVT Policy)

All employees who successfully complete prescribed treatment and can return to work will be subject to unannounced Non-DOT follow-up testing as prescribed by doctor/counselor.

5.0 Prohibited Behavior and Conduct

"Prohibited substances" addressed by this policy include the following:

5.1 Prohibited Drug Use

FTA regulations specifically prohibit the use of the following illegal, prohibited substances and require testing for their presence under certain circumstances: Marijuana, Amphetamines, Opioids, Phencyclidine (PCP) and Cocaine ("Prohibited Drugs") - Safety-sensitive employees may be tested for prohibited drugs at any time while on duty or **on MVT property**.

5.2 Prohibited Alcohol Use

The consumption of beverages containing alcohol, or substances including any medication such that alcohol is present in the body while performing safety sensitive duties or transportation business, are prohibited. "Alcohol" means the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols including methyl or isopropyl alcohol. (The concentration of alcohol is expressed in terms of grams of alcohol per 210 liters of breath as measured by an evidential breath testing device.)

5.3 Legal Drugs (MVT Policy)

The appropriate use of legally prescribed drugs and non-prescription medications is not prohibited. However, the use of any substance which carries a warning label that indicates that mental functioning, motor skills, or judgment may be adversely affected **MUST** be reported to supervisory personnel. Medical advice should be sought, as appropriate, while taking such medication and before performing safety-sensitive duties.

Any time an employee comes forward about a medication that he/she is taking the information must be forwarded to the Director of the Compliance Department for clarification and review. The Compliance department will then consult with the Medical Review Officer (MRO) to determine if the medication is appropriate to take while performing a safety-sensitive function.

A legally prescribed drug means that the employee has a prescription or other written approval (in his/her name) from a physician for the use of a drug during medical treatment. The misuse of legal drugs while performing a safety-sensitive function is prohibited at all times.

If the MRO determines that the medication being taken is not appropriate to take while performing a safety-sensitive function the employee will remain off duty until the issue is cleared by the MRO.

To continue performing a safety-sensitive function the employee taking the medication will be required to provide the following:

A written letter from the prescribing physician stating the patient's name, the name of the substance, the period of authorization and a statement that the medication will not adversely affect the employee's performance to drive or perform his/her safety sensitive function and that the employee may continue to perform his/her safety-sensitive function while taking such medication. The letter must be signed and dated by the physician and the letter will be provided to the MRO for final approval.

6.0 Prohibited Conduct. Manufacture, Trafficking, Possession, and Use of Controlled Substances

The manufacture, distribution, dispensation, possession, or use of controlled substances in the workplace is prohibited. A "controlled substance" is any illegal drug or any substance identified in Schedules I through V of Section 202 of the Controlled Substances Act (21 U.S.C. § 812), and as further defined by 21 CFR 1300.11-1300.15. Any employee engaging in the manufacture, distribution, dispensation, possession or use of a controlled substance on MVT premises will be subject to disciplinary action, up to and including termination and/or will be required to complete a drug abuse assistance or rehabilitation program. Law enforcement shall be notified, as appropriate, where criminal activity is suspected.

6.1 Requirement to Submit to Drug and Alcohol Testing

MVT shall require every covered employee who performs a safety-sensitive function as described in the FTA regulations Part 655 and the FMCSA regulations Part 382 to submit to post-accident, random, and reasonable suspicion drug and alcohol test- and to a pre-employment drug test- as described in this policy. MVT shall not permit any employee who refuses to submit to such tests to perform or continue to perform any safety-sensitive functions.

6.2 Alcohol Use/Hours of Compliance

No safety-sensitive employee should report for duty or remain on duty when his or her ability to perform assigned functions is adversely affected by alcohol or when his or her breath alcohol concentration is 0.04 or greater. No employee shall use alcohol **while on duty** or while performing safety-sensitive functions. No employee shall have used alcohol within four hours prior to reporting for duty. After an accident, employees shall refrain from alcohol use for eight (8) hours or until an alcohol test has been administered, whichever occurs first.

No safety-sensitive employee shall use alcohol during the hours that they are on call. On call employees can acknowledge the use of alcohol at the time he/she is called to report to duty and the inability to perform his/her safety sensitive function.

6.3 Compliance with Testing Requirements

Any safety-sensitive employee who refuses to comply with a request for testing, who fails to remain readily available for post-accident testing, who provides false information in connection with a test, or who attempts to falsify test results through tampering, contamination, adulteration, or substitution, shall be removed from duty immediately. Refusal can include an inability to provide a specimen or breath alcohol sample without a valid medical explanation, as well as a verbal declaration, obstructive behavior, or physical absence resulting in the inability to conduct the test.

6.4 Refusal to Submit to a DOT Alcohol or Controlled Substance Test

As an employee, you have refused to take a drug or alcohol test if you:

- (1) Fail to appear for any test (excluding pre-employment) within a reasonable time, as determined by the employer, after being directed to do so by the employer.
- (2) Fail to remain at the testing site until the testing process is complete; Provided, that an employee who leaves the testing site before the testing process commences, for a pre-employment test it is not deemed to have refused to test; unless the testing cup was handed to the donor.
- (3) Fail to provide a urine or breath specimen for any drug or alcohol test required by Part 40 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) Fail to provide a sufficient amount of urine or breath when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure.

It is MVT's policy that any employee that does not provide a valid specimen during a collection for a test will remain off duty until the employee is cleared by the MRO that the employee had a valid medical reason.

- (6) Fail or declines to take a second test the employer or collector has directed you to take.
- (7) Fail to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER as part of the "shy bladder" or "shy lung" procedures.
- (8) Fail to cooperate with any part of the testing process (e.g., refuse to empty pockets or wash hands when so directed by the collector, behave in a confrontational way that disrupts the collection process).
- (9) If the MRO reports that there is verified adulterated or substituted test result.
- (10) Failure or refusal to sign Step 2 of the alcohol testing form.
- (11) Failure to follow the observer's instructions during an observed collection including instructions to raise your clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if you have any type of prosthetic or other device that could be used to interfere with the collection process.
- (12) Possess or wear a prosthetic or other device that could be used to interfere with the collection process.
- (13) Admit to the collector or MRO that you adulterated or substituted the specimen.

As an employee, if you refuse to take a drug and/or alcohol test, you incur the same consequences as testing positive and will be immediately removed from performing any safety-sensitive functions and referred to the Substance Abuse Professional.

6.5 Compliance with Treatment Requirements

All employees are encouraged to make use of the available resources for treatment for alcohol and substance abuse problems.

6.6 Notify MVT of Criminal Drug Conviction

Every employee must notify MVT of any criminal drug statute conviction for a violation occurring in the workplace within five days after such conviction. Failure to do so shall subject said employee to disciplinary action up to and including termination, or satisfactory participation in a rehabilitation program, at the employee's expense.

6.7 Improper Application of the Policy

MVT is dedicated to assuring fair and equitable application of this "Zero Tolerance" substance abuse policy. Therefore, supervisors and managers are required to use and apply all aspects of this policy in an unbiased and impartial manner.

7.0 Testing for Prohibited Substances

7.1 General

Testing shall be conducted in a manner to assure a high degree of accuracy and reliability and using techniques, equipment, and laboratory facilities which have been approved by the U.S. Department of Health and Human Services (DHHS). Testing for prohibited drugs and alcohol on safety-sensitive employees shall be conducted in accordance with the procedures set forth in 49 CFR Part 40 as amended. See attached Testing Procedures for detailed procedures on all required types of drug and alcohol testing.

Medical Review Officer (MRO)- All drug testing results shall be interpreted and evaluated by an MRO who meets all applicable requirements of Part 40, who shall be responsible for receiving laboratory results generated by an employer's drug testing program and has appropriate medical training to interpret and evaluate an individual confirmed positive test result. The MRO shall comply with the drug testing procedures set forth in 49 CFR Part 40. The MRO will not review alcohol test results. When a confirmed positive test is reported from the testing laboratory, it is the responsibility of the MRO to: (a) contact the employee and afford the employee the opportunity to discuss the test results with him/her; (b) review the individual's medical history, including any medical records and biomedical information provided; (c) determine whether there is a legitimate medical explanation for the result, including legally prescribed medication. The MRO shall not convey test results to MVT until the MRO has made a definite decision that the test result was positive or negative, or refusal to test. If the employee provides an adequate explanation, the MRO verifies the test as negative and no further action is taken. When the MRO reports the results of the verified positive test to MVT, the MRO will disclose the drug(s) for which there was a positive test. If the MRO declares a drug test to be invalid for any reason, the test is considered canceled, and neither positive nor negative. However, a re-collection under direct observation may be ordered by the MRO.

The Medical Review Officer conducting MRO services for MVT is Dr. Stephen Kracht, M.D., D.O. in Kansas City, MO.

7.2 Testing for Prohibited Drugs

MVT shall collect or have collected urine samples from safety-sensitive employees to test for Prohibited Drugs. An assigned Collection Site will split each urine sample collected into a primary and a split sample. (See testing procedures) The urine samples will be sent under seal, with required chain of custody forms, to a laboratory certified by the DHHS. Currently MV Transportation is under contract with Alere Toxicology in Gretna, LA for its initial testing and confirmation testing. An initial drug screen will be conducted on each primary specimen. For those specimens that are not negative, a confirmatory Gas Chromatography/Mass Spectrometry (GS/MS) test will be performed. The test will be considered positive if the amounts present are at or above the minimum thresholds established in 49 CFR Part 40 as amended, as set forth in the attached Exhibit A (Threshold Levels).

Split Specimen Testing- If the test result of the primary specimen is positive or a refusal to test due to adulteration or substitution, the employee may request the MRO to direct his/her split specimen be tested in a different DHHS-certified laboratory. The MRO shall honor such a request if it is made within 72 hours of the employee having been notified of a verified positive or refusal to test result. This does not delay MVT from taking any action consistent with this policy for positive tests and the employee will be removed immediately from any safety-sensitive functions regardless if he/she is having his/her split specimen tested by a different laboratory. However, if the split specimen (bottle B) produces a negative result, or for any reason the second portion is not available, the test is considered cancelled and no sanctions are imposed. However, a re-collection under direct observation may be ordered by the MRO.

Cancelled Test - A drug or alcohol test that has a problem identified that cannot be or has not been corrected, or which this part otherwise requires to be cancelled. A cancelled test is neither a positive nor a negative test.

7.3 Alcohol Testing

Tests for alcohol concentration on safety-sensitive employees will be conducted with a National Highway Traffic Safety Administration (NHTSA) -approved evidential breath testing device (EBT) operated by a trained breath alcohol technician (BAT). In order to maintain quality assurance, EBT's must be externally calibrated in accordance with the plan developed by the manufacturer of the device. If the initial test on an employee indicates an alcohol concentration of 0.02 or greater, a second test will be performed to confirm the results of the initial test. For summary of applicable alcohol threshold levels, see Exhibit A.

8.0 Types of Testing

49 CFR Parts 655 and 382 require the following types of testing for Prohibited Substances for safety-sensitive employees: Pre-employment or transfer, reasonable suspicion, post-accident, random.

8.1 Pre-employment, Transfer Testing or Return to Work Testing

All applicants for safety sensitive positions shall undergo urine drug testing prior to employment. Receipt by MVT of a verified negative test result from the MRO is required prior to performing ANY safety sensitive functions for the first time. If an applicant or employee's drug test is cancelled or negative-dilute the employee or applicant shall be required to immediately take another pre-employment drug test.

Existing employees who are being considered for transfer to a safety-sensitive position from a NON-safety-sensitive position will be required to undergo a DOT pre-employment drug test. Any existing safety-sensitive employee who is simply transferring to a different division for another safety-sensitive position is **NOT required** to undergo another DOT pre-employment drug test.

8.1.1 Non-Safety-Sensitive Positions

All applicants applying for non-safety-sensitive positions will have to take and pass a pre-employment NON-DOT urine drug test prior to being hired.

8.1.2 Return to Work after 30 Days (DOT-FMCSA Policy)

MVT has some contracts that are subject to the Federal Motor Carrier Safety Regulations and NOT FTA regulations. Therefore, if the employee has a commercial license and has been out for 30 days or more AND the employee has been taken out of the random testing pool, the covered employee will be required to take a DOT pre-employment drug test before he/she can perform his/her safety-sensitive position.

8.1.3 Return to Work after 90 Days (DOT-FTA Policy)

If a covered employee has not performed a safety-sensitive function for 90 consecutive calendar days regardless of the reason, AND the employee has been removed from random pool, the employee must take and pass a DOT Pre-Employment drug test (NOT a return-to-duty) before he/she can perform a safety-sensitive function.

8.1.4 Return to Work after 30 Days for Non-Regulated employees not subject to federal guidelines but perform driving duties that is considered sensitive work (MVT Policy)

It is MVT's policy that all non-covered drivers who drive an MV vehicle and has not performed his/her driving functions for 30 or more consecutive days (regardless of reason) the non-covered employee will be required to take and pass another Non-DOT Pre-Employment drug test before he/she can return to his/her driving position.

****For confirmation of regulation authority contact Drug & Alcohol Compliance Department****

8.1.5 Previous Employer Request Requirement

As an employer we are required to verify previous violations of DOT drug and alcohol regulations within the last two years of employment with a DOT regulated agency or employer.

An employer must obtain and review the information listed below from any DOT-regulated employer the employee performed safety-sensitive functions for in the previous two years. The information must be obtained and reviewed prior to the first time an employee performs safety-sensitive functions. If not feasible, the information should be obtained no later than thirty (30) days after the first time an employee performs safety-sensitive functions. The information obtained must include:

1. Information on the employee's alcohol test in which a breath alcohol concentration of 0.04 or greater was indicated.
2. Information on the employee's-controlled substance test in which a positive result was indicated.

3. Any refusal to submit to a required alcohol or controlled substance test. (including verified adulterated or substituted drug test results)
4. Other violations of DOT agency drug and alcohol testing regulations

As the applicant or employee if you have violated any of the DOT drug and alcohol regulations, you must also obtain documentation of your successful completion of the DOT return-to-duty requirements (including proof of follow-up tests administered).

Furthermore, all applicants will be asked whether he or she has tested positive, or refused to test, on any pre-employment drug or alcohol test administered by an employer to which the employee applied for but did not obtain safety-sensitive transportation work covered by DOT agency drug and alcohol testing rules during the past two years.

8.1.6 Pre-employment Breath Alcohol Testing

Although it is not MV Transportation's policy to test for alcohol on a pre-employment test, MVT does have contracts that require a breath alcohol test be conducted in addition to the required drug test. Divisions that are subject to this requirement will have to take a pre-employment breath alcohol test. Breath alcohol testing will be in accordance with DOT Part 40 and 655.42.

8.2 Reasonable Suspicion Testing

All safety-sensitive employees shall be subject to reasonable suspicion testing, to include appropriate urine and/or breath alcohol testing when there is reasonable suspicion to believe that a covered employee has used a prohibited drug and/or engaged in alcohol misuse. A reasonable suspicion referral for testing will be made based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech, or body odors of the covered employee. Reasonable suspicion tests for the presence of alcohol shall be authorized by observations made just prior, during or immediately after the period of the day in which the employee is required to be in compliance with the requirements of Part 655; and those alcohol tests shall only be conducted just before, during, or just after the performance of a safety-sensitive function. If an alcohol test is not administered within two hours following the determination to test the employee, the employer shall prepare and maintain on file a record stating the reasons the alcohol test was not promptly administered. If the alcohol test is not administered within eight hours following the determination, MVT shall cease attempts to administer an alcohol test and shall state in the record the reasons for not administering the test.

Reasonable suspicion determination will be made by a supervisor, or other company official who has had the required Reasonable Suspicion training to detect and document the signs and symptoms of probable drug use and alcohol use and who reasonably concludes that an employee may be impaired by of a prohibited substance.

Any employee who is required to take a Reasonable Suspicion test will remain off duty until a negative alcohol and drug test is received.

8.3 Post-Accident Testing

Fatal Accidents

As soon as practicable following an accident involving the loss of human life, MV Transportation will conduct drug and alcohol tests on each surviving covered employee operating the public transportation vehicle at the time of the accident. Post accident drug and alcohol testing of the operator is not required under this section if the covered employee is tested under the fatal accident testing requirements of the Federal Motor Carrier Safety Administration rule 49 CFR 382.303 (a)(1) or (b)(1). MV Transportation shall also test any other covered employee whose performance could have contributed to the accident as determined by investigating staff using the best information available at the time of the decision.

Non-Fatal Injury Accidents

As soon as practicable following an accident not involving the loss of human life in which a public transportation vehicle is involved, MV Transportation will drug and alcohol test each covered employee operating the public transportation vehicle at the time of the accident unless investigating staff determine, using the best information available at the time of the decision, that the covered employee's performance can be completely discounted as a contributing factor to the accident.

Accident means an occurrence associated with the operation of a vehicle, if as a result: (1) An individual dies; or (2) An individual suffers bodily injury and immediately receives medical treatment away from the scene of the accident; or (3) With respect to an occurrence in which the transit vehicle involved is a bus, electric bus, van, or automobile, one or more vehicles (including non-FTA funded vehicles) incurs disabling damage as the result of the occurrence and such vehicle or vehicles are transported away from the scene by a tow truck or other vehicle; or (4) With respect to an occurrence in which the public transportation vehicle involved is a rail car, trolley car, trolley bus, or vessel, the public transportation vehicle is removed from operation.

(For exact testing criteria -See Post Accident Testing Procedures Pg. 28)

MV Transportation shall also test any other covered employee whose performance could have contributed to the accident as determined by investigating staff using the best information available at the time of the decision.

MV Policy: When to conduct a NON-DOT Post accident/incident test

If the accident does not meet the FTA/FMCSA testing criteria, MVT will reserve the right to test any safety-sensitive employee after any accident/incident regardless of the severity of the accident/incident. Additionally, MVT will test any other safety-sensitive employee whose performance MVT determines could have contributed to the accident.

Under these circumstances it must be explained to the employee that the drug and alcohol tests will be done under M.V. Transportation authority and should be done on NON-DOT drug and alcohol chain of custody forms.

Any employee who takes a post accident test will remain off duty until a negative drug test and alcohol test result is received.

8.4 Random Testing

Employees performing safety-sensitive functions will be subject to unannounced, random drug and alcohol testing in accordance with FTA regulations. The random drug and alcohol testing rates will be, at a minimum, based on the current FTA and FMCSA requirements at all times. Each such employee shall have an equal chance at selection and shall remain in the pool even after being tested. The basis for random selection shall be by a scientifically valid random number generation method initiated by computer. The dates for administering unannounced testing of randomly-selected covered employees shall be spread reasonably throughout the calendar year, month, week, and all hours that safety-sensitive functions are performed. This ensures that employees would have a reasonable expectation that they might be called for a test on any day they are at work. A covered employee shall only be randomly tested for alcohol misuse while the employee is performing safety-sensitive functions; just before the employee is to perform safety-sensitive functions; or just after the employee has ceased performing such functions. A covered employee may be randomly tested for prohibited drug use anytime while on duty. The employee must proceed to the test site immediately after being notified that he or she has been selected for testing in the allotted time given.

9.0 Consequences

9.1 Positive Alcohol Test

- (a) A safety-sensitive employee who has a confirmed alcohol concentration of 0.02 or greater but less than 0.04 will be removed from his or her duties for eight hours unless a confirmation test results in a concentration measure of less than 0.02. (For a test result which is less than 0.04 no other action will be taken except that which is described in this paragraph.)
- (b) An alcohol concentration of 0.04 or greater or a test refusal will be considered a positive alcohol test. The employee will be immediately removed from duty and referred to a Substance Abuse Professional (SAP) **and terminated from employment.**

9.2 Positive Drug Test

The consequences of a positive drug test or a test refusal are as follows: the employee will immediately be removed from safety sensitive duties, referred to a Substance Abuse Professional **and terminated from employment.**

10.0 MRO Report of a Negative Dilute Specimen

If the MRO informs MVT that a negative drug test was dilute, the employee will be directed to take another test immediately. In some cases, the MRO may require the retest to be performed under "Direct Observation." Each employee directed to take another test, will be given the minimum possible advance notice that he or she must go to the collection site to take another test.

For any employee that is directed to take another test, the result of the second test – not that of the original test – becomes the test of record which MVT will rely on for purposes of this policy. Any employee who is directed to take another test and the employee declines to do so, shall be considered as a refusal to test for purposes of this policy and DOT agency regulations.

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

11.0 Substance Abuse Professional (SAP)

A SAP must meet all the credential, basic knowledge, qualification training, continuing education, and documentation requirements of 49 CFR Part 40, Subpart O, §40.281 (a-e). The SAP will evaluate the employee to determine what assistance the employee needs in resolving problems associated with prohibited substance abuse or alcohol misuse. The SAP will also determine whether an employee has successfully completed a program of rehabilitation.

MV Transportation uses:

American Substance Abuse Professionals, Inc. (ASAP)
Nationwide Network www.go2asap.com
1421 Clarkview Road, Suite 130, Baltimore, Maryland 21209
Contact: Nicole Hanratty, CEAP, SAP, C-DERT
888-792-2727 x177 Mention MV Transportation

This firm is a national company that contains a large network of qualified SAPs throughout the United States. Employees simply call the toll-free number and provide the SAP their city and zip code and the SAP will find them the qualified SAPs closest to their area.

12.0 Training and Education

All employees shall participate in a minimum one-hour training session designed to meet FTA requirements by learning about the effects and consequences of drug use on personal health, safety and the work environment. For those supervisors participating in reasonable suspicion determination testing, there will be at least two hours of training to explain the criteria for reasonable cause testing, including at least an hour on the physical, behavioral and performance indicators of probable drug use and another hour on the physical, behavioral, speech and performance indicators of probable alcohol misuse. Initial training sessions will be re-enforced with educational materials and meetings. Further, employees shall be provided with a community hot-line telephone number.

13.0 Employee Assistance Community Service Hot-Line

The Center for Substance Abuse Treatment maintains a toll-free Referral Helpline
800-662-HELP
National Mental Health Association
800-969-NMHA (6642)
National Domestic Violence Hotline
800-799-SAFE
National Suicide Hotline
800-SUICIDE (784-2433)
National Child Abuse Hotline
800-422-4453

14.0 Records, Confidentiality

A safety-sensitive employee is entitled, upon written request, to review and obtain copies of any records relating to the employee's drug and alcohol testing. MVT must maintain records of its substance abuse program in a secure location with controlled access.

15.0 System Contact

Any questions regarding this policy or any other aspect of MVT's Substance Abuse Management Program should be directed to the office of the following:

Name: Esther Avalos, Director of Drug & Alcohol Compliance
Address: 2711 N. Haskell Ave., Ste. 1500, LB-2, Dallas, TX 75204
Phone Number: 972-391-4616

16.0 Local Authority

Local Division General Managers and Safety Managers are the Designated Employer Representatives (DERs) and are authorized to receive test information from the MRO as well as confirmation test results from the qualified B.A.T.

17.0 Revisions to the Policy and Program

This policy and program are subject to revision in accordance with the Department of Transportation regulations, as amended.

18.0 Zero Tolerance Policy

MV Transportation's "Zero Tolerance" Policy means any covered employee that has a verified positive drug or alcohol test, or test refusal, will be immediately removed from his/her safety-sensitive position, referred to a Substance Abuse Professional (SAP), and **will be terminated.**

EXHIBIT A

Pursuant to the Federal Department of Transportation regulations, the following are the drugs to be tested for, and the threshold levels of each test which MV Transportation is required to accept:

Initial test analyte	Initial test cutoff 1	Confirmatory test analyte	Confirmatory test cutoff concentration
Marijuana metabolites (THCA) 2	50 ng/mL ³	THCA	15 ng/mL.
Cocaine metabolite (Benzoylecgonine) ...	150 ng/mL 3	Benzoylecgonine	100 ng/mL.
Codeine/	2000 ng/mL	Codeine	2000 ng/mL.
Morphine		Morphine	2000 ng/mL.
Hydrocodone/	300 ng/mL	Hydrocodone	100 ng/mL.
Hydromorphone		Hydromorphone	100 ng/mL.
Oxycodone/	100 ng/mL	Oxycodone	100 ng/mL.
Oxymorphone		Oxymorphone	100 ng/mL.
6-Acetylmorphine	10 ng/mL	6-Acetylmorphine	10 ng/mL.
Phencyclidine	25 ng/mL	Phencyclidine	25 ng/mL.
Amphetamine/	500 ng/mL	Amphetamine	250 ng/mL.
Methamphetamine		Methamphetamine	250 ng/mL.
MDMA 4/MDA 5	500 ng/mL	MDMA	250 ng/mL.
		MDA	250 ng/mL.

* (ng/mL) nanograms per milliliter

ALCOHOL

(Includes ethanol, methanol, isopropanol)

Breath Alcohol Concentration

(expressed in terms of grams of alcohol per 210 liters of breath)

Initial Screen

Under 0.02

Confirmatory

(given if 0.02 or greater on initial screen)

0.02 to less than .04 employee may not perform safety-sensitive function

EXHIBIT B

The following is a general list of safety-sensitive functions and the job categories of employees who are subject to the provisions of 49 CFR Par 655 and 382 at MV Transportation:

NOTE: This list is subject to change and revision.

49	Maintenance Training Manager	340	Lead Dispatcher	416	Safety Manager	550	Mechanic
87	Safety Assistant	345	Dispatcher	420	BTW Trainer	561	Mechanic A (specify Union Class)
112	Floating Class A Mechanic	346	Window Dispatcher	425	BTW Instructor	562	Mechanic B (specify Union Class)
113	Body Repairman	349	Scheduling Manager	450	Classroom Instructor	563	Mechanic C (specify Union Class)
300	General Manager	350	Scheduler	451	Classroom Trainer	564	Technician A Mechanic
301	General Manager 1	352	Scheduling Coordinator	470	Parts Manager	565	B Mechanic
302	General Manager 2	353	VA Coordinator	471	Assistant Parts Manager	566	Technician C Mechanic
303	General Manager 3	354	Operations Supervisor	475	Parts Clerk	567	Technician Apprentice
304	General Manager 4	355	Road Supervisor	500	Maintenance Manager	568	Technician
310	Division Manager	357	Where's My Ride Supervisor	510	Assistant Maintenance Manager	569	Mechanic Helper
315	Assistant Division Manager	359	Lead Supervisor	512	Maintenance Technician	570	Cleaners
320	Operations Manager	379	Lead Schedule/Dispatcher	514	Bus Stop Maintenance	571	Mechanic Helper
321	Shift Supervisor	399	Call Center Manager	515	Maintenance Clerk	572	Body Shop Technician
322	Assistant Operations Manager	400	Safety and Training Manager	516	Maintenance Supervisor	575	Service Worker
323	Operations supervisor	405	Training Manager	517	Service Employee	580	Utility Crew
330	Dispatch Manager	406	Training Supervisor	518	Advanced Service Employee	584	Station Supervisor
332	Reservations Manager	410	Safety Trainer	519	Entry Level Mechanic	590	Bus Aide
335	Dispatch Supervisor	411	Safety Training Supervisor	520	Shop Foreman	600	Driver Trainer
336	Drive Cam Supervisor	415	Assistant Safety Manager	530	Lead Mechanic	610	Driver

Any MVT employee who has a non-safety-sensitive position, but who may perform a safety sensitive function at any time while they are working will be subject to random testing and will be included in the DOT random testing pool.

Testing Procedures

Note: Testing and collection procedures will be conducted as set forth by 49 CFR Parts 40 (as amended) & 655 & 382. The information on the following pages is meant for general information only for MV Transportation employees. Any questions regarding reference to the regulations should be directed to the policy section of this handbook. A copy of 49 CFR Part 40 is available for review to each employee upon request to their local manager.

This is a “Zero Tolerance” policy and any reference to return to work after a positive test result does not apply to employees affected by this policy. The FTA does not mandate “Second Chance”.

Pre-Employment Testing

1. The FTA regulations require that all applicants for employment in safety-sensitive positions or individuals being transferred to safety-sensitive positions from NON-safety-sensitive positions must be given a pre-employment drug test.
2. Applicants may not be assigned to safety-sensitive functions unless they pass the drug test.
3. Applicants must be informed in writing of the testing requirements prior to conducting the test. **MVT will require applicant to sign a form acknowledging that they know that their urine will be tested for Cocaine, PCP, Amphetamines, Marijuana, and Opioids.**
4. Appropriate personnel at each location will schedule appointments for collection. The employee must be made aware that their placement into a safety sensitive position is contingent upon a negative test result.
5. It is the responsibility of the applicant to report to the collection site at the time and day scheduled.
6. Positive test results must be reviewed by the MRO.
7. Applicants are notified by the MRO of the laboratory results and are given an opportunity to discuss the results.
8. Applicants who test positive will not be hired into a safety-sensitive position.
9. An applicant whose pre-employment test results are negative will continue through the safety-sensitive hiring process.
10. Applicants will be asked whether he or she has tested positive or refused to test on a pre-employment drug or alcohol test while trying to obtain safety sensitive transportation work from an employer covered by DOT agency during the past two years. If applicant admits that he or she had a positive test or a refusal to test, MV will not allow the applicant to perform safety sensitive duties unless and until applicant provides documents showing the successful completion and release from a SAP.

Random Testing Procedures

The FTA regulations require random testing for prohibited drugs and alcohol for all safety-sensitive employees. Random testing identifies those who are using drugs or misusing alcohol but can use the predictability of other testing methods to escape detection. More importantly, it is widely believed that random testing serves as a strong deterrent against employees beginning or continuing prohibited drug use and misuse of alcohol at MVT. MV Transportation has developed procedures for notification and collection to best implement the requirements of the federal rules.

These procedures answer common questions regarding random testing: Who is tested? Why are only some individuals tested? When and how do the tests occur?

1. Random drug and alcohol testing applies only to safety-sensitive employees. Identification numbers for all safety-sensitive employees will be included in a selection pool.
2. Random drug and alcohol testing is accomplished by a scientifically valid, tamper-proof, computer-generated selection process. A random list for testing of employee numbers will be generated every month.
3. Employees are chosen in an unannounced, unpredictable manner. No employee will be removed from the random pool following the next selection, and every employee will continue to be subject to random selection throughout the year. Every employee in the random pool has an equal chance of being selected every time. Employees are only removed from the random pool when they are in rehabilitation programs, terminated or permanently transferred to a non-safety-sensitive position, or expected to be out for at least 90 days or more.
4. Random testing will be conducted on all shifts, all times of day, and all days of the week throughout the calendar year. No shift is exempt from testing.
5. Random drug testing may be conducted concurrently with random alcohol testing or at any time during an employee's shift. Random alcohol testing will be conducted just before the employee is scheduled to perform a safety-sensitive function, while the employee is performing safety-sensitive functions or just after the employee performs a safety-sensitive function. The employee must proceed to the test site immediately after being notified that he or she has been selected for testing in the allotted time given.
6. For both Maintenance and Operations (Drivers) the Divisional Manager in each location will be notified which employees have been selected for testing. Once an employee is notified of his/her selection, he/she must report immediately for the test. Failure to report after notification constitutes a refusal to test. (see procedures for random test notification)
7. Employees will be notified where to report for collection, when to stop work and report to the collection site and who will relieve them, if necessary.
8. The employee must submit to a drug and/or alcohol test. Failure to cooperate with the collection procedure in any way constitutes a refusal to test which has the same consequences as a positive test result.

9. The employee is in a paid status throughout the random testing procedure. Employees will be removed from duty if the results are positive **and employee will be terminated.**
10. If both alcohol and drug tests are being given, the breath alcohol test will be performed first. Immediately thereafter, the urine sample will be collected for the drug test.
11. If there is a confirmed breath alcohol test of between .02% and .039% (inclusive), the employee will be relieved from duty immediately for a minimum of eight (8) hours.
12. If there is a confirmed positive breath alcohol test (.04% or above), the employee will be given the name of a Substance Abuse Professional (SAP) **and terminated.**

Procedures for Random Test Notification

1. The Human Resource Department triggers the selection list of the month's safety-sensitive employees to be scheduled for testing.
2. The local manager will review work schedules, including planned absences when known, to develop a best available time to perform the tests. The local manager will coordinate the testing schedule with the collector.
3. In developing testing times, the goal will be to minimize the impact in service. Testing will be conducted using the following priority periods:
 - Before work,
 - During split time,
 - After work/shift is completed
 - During work, with standby personnel relief.
4. During work, without relief (if no other time is possible).
5. Notification of Employees- The Human Resources Department triggers notification to each location's designated employer representative (DER) via electronic mail. The DER will notify each safety-sensitive employee selected and thus notified. Each employee who is selected is to report to the test site immediately

The employee cannot "go off sick" or on vacation or leave of absence after notification.

6. Collection site personnel shall report "unreasonable delays" to the local DER as employees are required to immediately report to the collection site following notification. Failing to report to the collection site within a reasonable allotted time constitutes a refusal to test.
7. The DER shall confirm with the Regional, Divisional, or Operations Manager that the employee was notified.
8. The DER shall notify the proper management official if an employee fails to report for testing after notification.
9. An employee who fails to report for testing shall be removed from duty immediately. If employee is determined to have "refused to test" he/she face the

same consequences as testing “positive” for drugs/alcohol and will be given the name and number of a SAP and **terminated from employment**.

Collection Procedures for All Tests

All collection procedures shall be performed in accordance with Part 40. Upon notification of a test under this policy;

1. The employee must report to the collection site immediately after notification.
2. The employee shall provide photo identification to collection site personnel. Supervisors will verify the identification of employees without photo identification and may photograph the employee if necessary.
3. The employee must comply with all collection procedures.
4. The employee must follow the directions of the collection staff to ensure that an unadulterated urine specimen is collected, and/or the breath alcohol test is completed.
5. The employee will be in a private enclosure and unobserved unless a direct observed collection is determined to be needed by the MRO, the local DER, or the collector.
6. The employee must supply at least 45 ml of urine (approx. 1 ½ oz). If the employee gives an inadequate amount of urine or if the employee is unable to give a sufficient urine sample collection site staff shall provide the individual with no more than 40oz of fluid to drink during a period of up to 3 hours. The employee will attempt to provide a complete sample using a fresh container. If the required amount is provided, the collection staff will continue with collection process. If the employee is still unable to provide an adequate specimen within three hours of the first unsuccessful attempt to provide the specimen, the collection staff must discontinue the collection, note the facts on the “remarks” line of the CCF, and immediately notify the DER.

Shy Bladder - The term “shy bladder” refers to a situation when the employee does not provide a sufficient amount of urine (45 ml) for a DOT required drug test. If an employee tells the collector, upon arrival at the collection site, that he or she cannot provide a specimen, the collector must still begin the collection procedure regardless of the reason given and direct the employee to make the attempt to provide the specimen.

The employee must be monitored during this time. If the employee leaves the collection site or refuses to make the attempt to provide a sufficient urine specimen, this is considered a refusal to submit to a test.

Failure to produce a sample of urine will result in an immediate referral for an evaluation from a licensed physician within 5 days who can determine in his or her reasonable judgment the safety-sensitive employee’s inability to provide an adequate amount of urine. If no medical reason is found substantiating an inadequate sample, the incident will be treated as a “refusal to test” and will carry the same consequences as a positive test result.

It is MVT's policy that any employee who does not provide a valid specimen during a collection for a test will remain off duty until the employee is cleared from the MRO that the employee had a valid medical reason.

7. If the employee fails to provide an adequate amount of breath for the breath alcohol test, a second attempt will be made. If the Employee, after multiple attempts, fails to produce a sample, the Breath Alcohol Technician (BAT) shall so note in the "Remarks" section of the breath alcohol testing form and immediately inform the DER. The DER will instruct the employee to obtain, as soon as possible but within 5 days after the attempted provision of breath, an evaluation from a licensed physician who is acceptable to the employer concerning the employee's medical ability to provide an adequate amount of breath.
8. Whenever there is reason to believe that an individual has altered or substituted the urine specimen, a second specimen shall be obtained as soon as possible under direct observation of a same gender observer. Reasons may include; temperature of the specimen out of normal range, bluing agent in the specimen.

Substituted Specimen- A specimen with creatinine and specific gravity values that are so diminished that they are not consistent with human urine.

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

9. If the breath alcohol screening is 0.02 or greater, the breath alcohol technician will wait at least 15 minutes and a maximum of 30 minutes before administering the confirmation test. Even if more than 30 minutes have passed the BAT will still conduct the confirmation test.
10. To ensure that the test results are attributed to the correct covered employee; both specimen bottles must be sealed and labeled in the presence of the donor. The labels must be printed with the same specimen identification number as the custody control form and are attached to the specimen bottles. The donor initials the labels on the vials verifying that the specimen is his or hers.

Reasonable Suspicion Testing Procedures

1. Supervisors and managers receive training to identify behaviors that might be indicators of drug use and/or alcohol misuse. Training includes the procedures for how to deal with employees suspected of drug use and/ or alcohol misuse.
2. If a supervisor observes an appearance, behavior, speech pattern, or body odor of the covered employee that might be indicative of drug use and/or alcohol misuse, he/she directs the employee to stop work and escorts the employee to an area to be questioned and observed in private.
3. The supervisor completes the Reasonable Suspicion Incident Report. The

supervisor must ensure that the employee does not continue to operate in a safety-sensitive function after identified for reasonable suspicion testing.

4. If there is a decision to test based on observable symptoms, the employee is ordered to submit to a drug and alcohol test and is escorted to the collection site.
5. The employee is on paid status until the test collection is completed. **Employee will remain off duty until a negative drug and alcohol test is received.** To the greatest extent possible, arrangements shall be made to have him/her transported home and employee should not be allowed to leave on his/her own recognizance.
6. If there is a confirmed breath alcohol test of between .02% and .039% (inclusive), the employee will be relieved from safety-sensitive duty immediately for a minimum of eight (8) hours. If there is a confirmed positive breath alcohol test (.04% or greater) and/or confirmed positive drug test, or refusal to test, the employee shall be provided the name and number of a SAP and the employee **will be terminated.**
7. If the employee's drug test is confirmed negative by the MRO and/or the BAT test is below 0.02 the employee will be allowed to return to work and will be paid for any time missed.

Post-Accident Testing Procedures

The FTA regulations require testing for prohibited drugs and alcohol in the case of certain public transportation accidents. Post-accident testing is mandatory for accidents where there is a loss of life and for other non-fatal accidents.

1. The supervisor ensures that all injured people receive proper 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 for the period necessary to obtain assistance in responding to the accident or to obtain necessary emergency medical care.
2. The supervisor determines whether the accident meets FTA criteria using MVT's "Post Accident Decision Checklist Form".
3. If the accident meets the FTA/DOT criteria a DOT post accident drug and alcohol test will be conducted immediately. The employee will be taken to the collection site and tested as soon as practicable following the accident. The employee should remain readily available for alcohol testing up to 8 hours and for drug testing up to 32 hours after the accident, including notifying his/her supervisor of his/her location or he/she may be deemed to have refused to submit to testing if he/she does not make him/herself readily available for testing.
4. **Once the tests have been completed the employee will remain off duty until a negative drug and alcohol test is received.**
5. If the employee is not tested within two hours for alcohol, the supervisor must document the reason for the delay, and if test is not conducted in 8 hours, the DER shall cease all further attempts and update the records as to the reason(s)

why the test was not completed. If the 32 hours have passed the DER shall cease all further attempts to complete the drug test.

6. If the employee refuses to be tested, or the breath alcohol test is .04 or greater, or if the drug test is confirmed positive, the employee is immediately removed from duty, the Sap will find them the qualified SAPs closest to their area and **will be terminated**.

Post -Accident Testing Criteria

It should be noted that a post-accident test is given because the incident meets the criteria listed below. It is NOT a probable cause or reasonable suspicion test. An accident (§ 655.4) is defined as an occurrence associated with the operation of a vehicle in which:

1. An individual dies.
2. An individual suffers a bodily injury and immediately receives medical treatment away from the scene of the accident.
3. With respect to an occurrence in which the public transportation vehicle involved is a bus, van or automobile, one or more vehicles incurs disabling damage as the result of the occurrence and is transported away from the scene by a tow truck or other vehicle. For purposes of this definition, “disabling damage” means damage which precludes departure of any vehicle from the scene of the occurrence in its usual manner in daylight after simple repairs.

(Inclusions) Disabling damage includes damage to vehicles that could have been operated but would have been further damaged if so operated.

(Exclusions) damage which can be remedied temporarily at the scene of the occurrence without special tools or parts, tire disablement without other damage even if no spare tire is available, or damage to headlights, tail-lights, turn signals, horn, or windshield wipers that makes them inoperative.

4. With respect to an occurrence in which the public transportation vehicle involved is a rail car, trolley car, trolley bus, or vessel, the public transportation vehicle is removed from operation.
5. The FTA has determined that “**LIFTS**” constitute equipment used in revenue service and their operation is essential to the operation of the vehicle and protection of public safety, their operation shall now be included in the accident definition.

To determine if a test should be administered under this section, always use MV Transportation’s “Post Accident Decision Checklist”. This form should be used for all accidents in determining whether a test will be done under DOT authority.

Prohibited Drugs and Alcohol Misuse

MVT is required to ensure that all covered employees receive at least 60 minutes of training and discussion on the effects and consequences of prohibited drug use on personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use. The information below shall assist in providing statistics and examples of substance abuse in the work force and the signs and symptoms of such use.

A study conducted showed 75 percent of illicit drug users 18 and older are employed, which amounts to about 10 million U.S. workers. On a daily basis, based on 250 work days in a year, at least 42,000 Americans are coming to work stoned or are getting “high” while on the job.

Studies and statistics show that:

1. Every 23 minutes a death occurs as a result of a drug or alcohol related accident.
2. A typical abuser is:
 - a. Late to work 3 times more often
 - b. Requests twice as much time off
 - c. Is absent 2 1/2 times more than average
 - d. Uses 3 times as many sick benefits
 - e. Collects 5 times as much worker’s comp
 - f. Has 300% higher medical costs/benefits

If these statistics haven’t convinced you that the problem is serious, let’s look at a few more.

A national survey once reported that:

1. 19% of all children over the age of 12 had used some type of illegal drug
2. 65% of 18 to 25-year olds had used some type of illegal drug
3. 30 to 40 million Americans stated they had used cocaine
4. By age 17, 70% of American teenagers had tried alcohol

As you can see, drug and alcohol abuse is a serious problem, having a major effect on all our lives. Even though you may not be abusing drugs or alcohol, you are affected by the results of drug and alcohol abuse in our society. You pay higher medical costs to help cover the costs for abusers who cannot afford the cost of treatment. You pay higher insurance costs to help fund the drug and alcohol abuse programs paid for by insurance companies. The material and services you buy cost more because of decreased worker productivity, as well as increased cost to employers.

This section is designed to provide you with a brief overview of the seriousness of using controlled substances and alcohol. It also provides education on the signs, symptoms and effects of the illicit drugs that you will be tested for. Your employer has taken great measures to assure you of a safe working environment. Please review this booklet in its entirety to educate yourself on drug and alcohol in the workplace. When you have completed reading this material, you will better understand the need for a drug-free workplace.

The drugs for which you will be subject to testing include:

- Amphetamine
- Cocaine
- Marijuana
- Opioids
- Phencyclidine (PCP)
- Alcohol (by evidential breath testing device only)

Facts about Amphetamines

Amphetamines (methamphetamine, MDMA-ecstasy) are central nervous system stimulants. They tend to make people “hyper” and “jumpy”. They can be taken either orally or injected. They are often used by people to stay awake and to counteract the effects of drowsiness. They are especially dangerous to take while performing safety-sensitive tasks or driving.

Ecstasy, MDMA (3,4 methylenedioxymethamphetamine), is a synthetic, psychoactive drug that is chemically similar to the stimulant methamphetamine and the hallucinogen mescaline. MDMA causes an increase in serotonin which plays an important role in the regulation of mood, sleep, pain, appetite, and other behaviors.

Some heavy MDMA users experience long lasting confusion, depression, and selective impairment of working memory and attention processes. Ecstasy users make extremely dangerous drivers. They can exhibit the same impairments as amphetamine, heroin, cocaine, and hallucinogen users.

Signs and Symptoms of Amphetamine Use

- ◆ Hypersensitivity
- ◆ Exhaustion
- ◆ Dilated Pupils
- ◆ Grinding teeth
- ◆ Loss of appetite and immediate weight loss
- ◆ Dry mouth
- ◆ Excessive talking

Effects on Person

- ◆ More likely to take risks
- ◆ Impaired judgement

Facts about Cocaine

Cocaine also stimulates the central nervous system. It gives the user an intense feeling of well-being, or euphoria, known as a “high”. The “high” will last for 10 to 60 minutes. A more potent form of the drug called “crack” cocaine is especially addicting and dangerous. Although it’s “high” lasts only about 5 to 8 minutes, “crack” cocaine can be addicting after only one use, and cause death the first time it is used. Cocaine can be injected, snorted, or free-based. Snorting is sniffing the drug up the nose, and free-basing is done by heating the drug and inhaling the vapors.

Signs and Symptoms of Cocaine Use

- ◆ Mood swings
- ◆ Weight Loss
- ◆ Restlessness: Difficulty sitting or standing in one place
- ◆ Depression
- ◆ Nose bleeds
- ◆ Irritable, angry, nervous, angers easily
- ◆ Bad breath
- ◆ Euphoric feeling
- ◆ Running nose, uncontrollable sniffing

Effects on Person

- ◆ Slowed reaction time
- ◆ Distorted vision and depth perception
- ◆ Slow to make decisions
- ◆ Unable to correctly measure time and distance

Facts about Marijuana

Marijuana is a depressant and mind-altering drug. Marijuana does not depress the central nervous system’s reaction, it works on the brain. Mind altering means it causes hallucinations. It can be eaten or smoked. Street names for marijuana are “dope”, “grass”, “joint”, “hash”, or “hooch”.

Tests have shown that people’s reflexes and thought processes are slower under the influence of marijuana. The effects of this drug are longer lasting than first thought. In fact, impairment can last more than 24 hours after using marijuana. The body actually stores the drug for days, weeks, and in some cases, months, depending on the frequency of use.

Signs and Symptoms of Marijuana Use

- ◆ Dilated pupils
- ◆ Slowed reflexes
- ◆ Giddiness
- ◆ Slowed thinking
- ◆ Moodiness
- ◆ Trance-like state
- ◆ Impaired vision
- ◆ Reduced feeling of pain
- ◆ Odor of burning
- ◆ Short-term memory loss
- ◆ Loss of concentration
- ◆ Unable to sleep after prolonged use

Signs To Look For

- ◆ Cigarette rolling paper
- ◆ Dried plant material, either crumbled or pressed
- ◆ Roach clip (device to hold joint)
- ◆ Hash pipe (very small pipe)

Facts about Opioids

Opioids are classified as a narcotic analgesic. They tend to have a sedating, calming effect, and act as a depressant to the central nervous system. Opioids are more commonly known as morphine, codeine, hydrocodone, hydromorphone, oxycodone, oxymorphone, and heroin. Street names for Opioids are “junk”, “smack”, “horse”, and “brown sugar”. Opioids are prescribed by doctors to relieve pain, they can either be taken orally, injected or smoked. Some common names for these semi-synthetic opioids include OxyContin®, Percodan®, Percocet®, Vicodin®, Lortab®, Norco®, Dilaudid®, Exalgo®.

When the drug is injected, the user feels an immediate “rush”, usually followed by a very relaxed and soothing feeling. However, some Opioids can cause very unpleasant side effects such as nervousness, nausea, and restlessness, and if taken in excess, may cause coma or death.

Signs and Symptoms of Opioid Use

- ◆ Mental confusion

- ◆ Slurred speech
- ◆ Unsteadiness
- ◆ Hostility
- ◆ Memory loss
- ◆ Drowsiness
- ◆ Excess talking
- ◆ Euphoria
- ◆ Depression
- ◆ Short attention span
- ◆ Cold, moist or bluish skin
- ◆ Reduced feeling of pain

Effects on Person

- ◆ Lack of concentration – Day dreaming
- ◆ Distorted sense of time and distance
- ◆ Distorted vision

Facts about Phencyclidine (PCP)

Phencyclidine, commonly called “Angel Dust”, is known as a dissociative anesthetic. Users of PCP may experience hallucinations and signs of intoxication. They may not be able to focus their attention or will experience confusion and lack of coordination.

Although PCP has immediate short-term effects, it is also known for its long-term effect of causing psychotic behavior often associated with violent acts. Other street names for PCP include “hog”, and “crystal”. PCP may be smoked, snorted or injected.

Signs and Symptoms of PCP Use

- ◆ Delusions
- ◆ Confusion
- ◆ Panic
- ◆ Increased blood pressure
- ◆ Anxiety
- ◆ Flashbacks

Effects on Person

- ◆ More likely to take risks
- ◆ Impaired coordination
- ◆ Aggressive actions

Facts about Alcohol

Alcohol is a socially acceptable drug that has been consumed throughout the world for centuries. It is considered a recreational beverage when consumed in moderation for enjoyment and relaxation during social gatherings. However, when consumed primarily for its physical and mood-altering effects, it is a substance of abuse. As a depressant, it slows down physical responses and progressively impairs mental functions.

Signs and Symptoms of Use

- ◆ Dulled mental processes
- ◆ Lack of coordination
- ◆ Odor of alcohol on breath
- ◆ Possible constricted pupils
- ◆ Sleepy or stuporous condition
- ◆ Slowed reaction rate
- ◆ Slurred speech

(Note: Except for the odor, these are general signs and symptoms of any depressant substance.)

Health Effects

The chronic consumption of alcohol (average of three servings per day of beer [12oz], whiskey [1oz], or wine [6oz glass] over time may result in the following health hazards:

- ◆ Decreased sexual functioning
- ◆ Dependency (up to 10% of all people who drink alcohol become physically and/or mentally dependent on alcohol and can be termed “alcoholic”)
- ◆ Fatal liver diseases
- ◆ Increased cancers of the mouth, tongue, pharynx, esophagus, rectum, breast, and malignant melanoma.
- ◆ Kidney disease, Pancreatitis, Ulcers
- ◆ Spontaneous abortion and neonatal mortality
- ◆ Birth defects (up to 54% of all birth defects are alcohol related).

Workplace Issues

- ◆ It takes one hour for the average person (150 pounds) to process one serving of an alcoholic beverage from the body.
- ◆ Impairment in coordination and judgment can be objectively measured with as little as two drinks in the body.
- ◆ A person who is legally intoxicated is 6 times more likely to have an accident than a sober person.



**ACKNOWLEDGEMENT
OF
EMPLOYER'S DRUG AND ALCOHOL TESTING POLICY**

I, _____, the undersigned, hereby
Print Full Name

acknowledge that I have received a copy of the anti-drug and alcohol misuse program policy mandated by the U.S. Department of Transportation, Federal Transit Administration for all covered employees who perform a safety-sensitive function. I understand this policy is required by 49 CFR Part 655, as amended, and has been duly adopted by the governing board of the employer. Any provisions contained herein which are not required by 49 CFR Part 655, as amended, that have been imposed solely on the authority of the employer are designated as such in the policy document.

I further understand that receipt of this policy constitutes a legal notification of the contents, and that it is my responsibility to become familiar with and adhere to all provisions contained therein. I will seek and get clarification for any compliance with all provisions contained in the policy. I also understand that compliance with all provisions contained in the policy is a condition of employment.

I further understand that the information contained in the approved policy dated April 1, 2018 is subject to change, and that any such changes, or addendum, shall be disseminated in a manner consistent with the provision of 49 CFR Part 655, as amended.

I hereby acknowledge that I have participated in and completed the required minimum 60 minutes of training on the effects and consequences of prohibited drug use on personal health, safety, and the work environment, and on the signs and symptoms that may indicate prohibited drug use in accordance with Part 655.14(b)(1) and in addition, to the training, this policy and handbook was reviewed.

I further acknowledge that I have been advised of the consequences for safety sensitive employees who violate the testing requirements.

Signature of Employee

Date

Print Name



MV Transportation Employee Handbook

Issue Date
January 1, 2018

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WELCOME TO MV TRANSPORTATION

As you begin your employment with MV Transportation, we welcome you to our organization and invite you to read and become familiar with the contents of this handbook. We believe you will find it full of helpful and valuable information about our policies and procedures. This handbook is designed to guide and assist you in performing to the best of your abilities, as well as developing and realizing your potential as one of our valued employees.

For over four decades, MV Transportation has been a leading provider of reliable and safe transportation. With your help, we are looking forward to continuing growth and prosperity as we find new and better ways to serve our customers' needs.

Please read this handbook carefully and retain it for future use. Familiarize yourself with its contents as soon as possible because it should answer many of your initial and ongoing questions about your employment. This handbook has been developed by MV Transportation to promote understanding, cooperation, and good communication. You are responsible for being familiar with the information included in the handbook. If you have any questions about any of the information, please ask your supervisor or Human Resources for explanation or clarification.

THIS HANDBOOK GENERALLY DESCRIBES SOME OF MV TRANSPORTATION'S CURRENT POLICIES AND PROCEDURES. **THIS HANDBOOK DOES NOT CONSTITUTE A CONTRACT OF EMPLOYMENT.** NOTHING IN THIS HANDBOOK SHALL BE CONSTRUED TO CONSTITUTE A CONTRACT, AND THE COMPANY HAS THE RIGHT, AT ITS DISCRETION, TO MODIFY THIS HANDBOOK AT ANY TIME, UNLESS OTHERWISE PROVIDED UNDER THE TERMS OF AN APPLICABLE COLLECTIVE BARGAINING AGREEMENT, ARBITRATION AGREEMENT, OR OTHER VALID CONTRACT. THIS HANDBOOK SUPERSEDES AND REPLACES ALL PRIOR HANDBOOKS. HOWEVER, IF YOU ARE COVERED BY A COLLECTIVE BARGAINING AGREEMENT ("CBA"), TO THE EXTENT THERE ARE ANY DISCREPANCIES BETWEEN THIS HANDBOOK AND THE CBA, THE CBA WILL CONTROL.

Once again, we welcome you to our family and wish you success as we turn to face the numerous challenges, opportunities, and potential rewards ahead.



Kevin Jones
Chief Executive Officer

Mission Statement and Values

Mission Statement

We deliver innovative transportation solutions that provide freedom of movement, safety and a customer experience that is second to none.

Our Values

We are a people business and the word “RESPECT” best describes our commitment to service. To our passengers, YOU are the Company. As a MV employee, it is your responsibility to always protect our values. You have joined a very special Company that provides a very important service to our clients and customers. We stand for:

R espect	Let courtesy, warmth, empathy and kindness drive your behaviors
E thics	Simply put, do the right thing
S afety	Nothing is more important than safety
P rofitable Growth	Positive financial performance of our Company
E xcellence	Quality and integrity are our backbone
C elebration & Collaboration	It is all about teamwork and recognizing each other and our accomplishments
T alent & Innovation	We are the best at what we do and the service we provide

Purpose of Employee Handbook

This employee handbook has been drafted as a guideline for our employees. It describes the Company’s general philosophy and some of its current policies and procedures, but it is not intended to be all-inclusive. Unless otherwise provided under the terms of an applicable Collective Bargaining Agreement, arbitration agreement, or other valid contract, the Company reserves the right to amend, withdraw, supplement, or modify any terms or conditions of employment, at any time and for any reason, without prior notice, whether stated in the handbook or established through employment practices or other employment policies, except for the Company policy regarding at-will employment which may only be modified as described below.

While the Company will generally follow the guidelines stated in this handbook, you should understand that it does not constitute a contract between you and the Company. The Company may deviate from these guidelines where federal, state

or local law has specific requirements which the Company must adhere to or follow. This Handbook contains some of the authorized employment policies of the Company and supersedes any other versions. Please see your manager for a copy of this policy which is also available on Portal or Sharepoint.

Nature of Our Business

MV is a private contractor operating passenger transportation services for public and private agencies nationwide. We operate in a very competitive business environment; hence, we must operate safely, control our costs and provide outstanding customer and client service. We welcome your suggestions on how we can make improvements at our Company. Every MV employee plays a critical role in our success.

At-Will Employment

MV is an at-will employer. That means that employment may be terminated at any time by either the employee or the Company, with or without notice, for any lawful reason. This also means your terms and conditions of employment, including but not limited to termination, demotion, promotion, transfer, compensation, benefits, duties, hours, and location of work may be changed with or without cause or notice at the Company's sole discretion. The at-will employment relationship cannot be changed, and no employee of the Company is employed for any specific time period, unless he or she has or is covered by a written agreement signed by the CEO, CHRO or if otherwise required by law. No person other than the CEO or CHRO is authorized to enter into any employment agreement for a specified term with any employee.

Some of our employees are covered by a collective bargaining agreement. If you are covered by a collective bargaining agreement, your employment relationship, including the terms and conditions of your employment, is governed by that Agreement.

Equal Employment Opportunity

As a government contractor, MV's employment policy is to provide equal opportunity to all persons and to require affirmative action to ensure equality of opportunity in all aspects of employment. In furtherance of this policy, employment decisions shall be based on merit, qualifications, and competence. Except where required or permitted by law, employment practices shall not be influenced or affected by virtue of an applicant's or employee's race, color, creed, religion, sex, national origin, age, pregnancy, disability, veteran status, marital status, sexual orientation, gender identification, or any other characteristic protected by law. This policy statement governs all aspects of employment including but not limited to recruitment, selection, promotions, terminations, transfers, layoffs, compensation, training, benefits, and other terms and conditions of employment.

MV prohibits retaliation against applicants or employees who file discrimination charges with federal, state or local fair employment practice agencies, participate in investigations of such charges or an OFCCP proceeding, oppose unlawful employment practices, or assert any other rights protected by law.

MV's Equal Opportunity Policy is an essential part of the Company's overall commitment to attract, hire and develop a strong, talented and diverse work force.

Accommodations for Disabilities, Work Restrictions and Religion

MV takes affirmative steps to employ and advance qualified individuals with disabilities at all levels of employment. MV Transportation will make a reasonable accommodation for the known physical or mental limitations of otherwise qualified individuals with a disability and/or who are otherwise physically restricted in the job duties they can perform, unless the accommodation would impose an undue hardship and/or a direct threat to the health and/or safety of the individual or others would result. Reasonable accommodation means any change or adjustment to a job or work environment that permits an otherwise qualified applicant or employee with a disability or work-related restrictions to participate in the job application process or to perform the essential functions of a job. Individuals seeking accommodations must make the request to their supervisor and to the Human Resources Department. Supervisors or managers who are notified of a request for accommodation must immediately forward the request to the Human Resources Department.

MV Transportation will also attempt to make reasonable accommodations for employee observance of sincerely held religious beliefs. All requests for a religious accommodation should also be directed to the supervisor and the Human Resources Department. Supervisors or managers who are notified of a request for an accommodation must forward all requests for a religious accommodation to the Human Resources Department.

Once a request for an accommodation is received, the request will be analyzed in order to aid in the determination of a reasonable accommodation. This interactive process may require additional documentation and/or communications with or between the employee, management, and/or the Human Resources Department, including obtaining more information regarding the requested accommodation and/or the reason for the accommodation and an assessment of any and all restrictions, in order to evaluate possible accommodations and the feasibility of proposed accommodations. All requests for accommodations will be considered and resolved on a case by case basis in accordance with applicable law.

Disabled, Recently Separated, Other Protected, & Armed Forces Service Medal Veterans

MV's employment policy prohibits job discrimination and requires affirmative action to employ and advance disabled veterans, recently separated veterans (within three years of discharge or release from active duty), other protected veterans (veterans who served during a war or in a campaign or expedition for which a campaign badge has been authorized) and Armed Forces service medal veterans (veterans who, while on active duty, participated in a U.S. military operation for which an Armed Forces service medal was awarded).

Anti-Harassment/Anti-Discrimination Policy

All Company employees have a right to work in an environment free from all forms of unlawful discrimination and harassment. Consistent with the Company's respect for the rights and dignity of each employee, discrimination and harassment based on race, color, creed, religion, sex, national origin, age, pregnancy, disability, veteran status, marital status, sexual orientation, gender identification, or any other characteristic protected by applicable law, will not be tolerated. This includes harassment and discrimination by any MV employee, or a contractor, agent or third parties with whom MV employees interact during the course of their employment. All employees should be aware of the following:

1. Sexual harassment is strictly prohibited. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: (a) submission to such conduct is made as either an explicit or implicit term or condition of employment; (b) submission to or rejection of such conduct is used as a basis for an employment decision affecting the harassed employee; or (c) such conduct has the purpose or effect of interfering with an employee's work performance or creates an intimidating, hostile, or offensive work environment pursuant to applicable law. Sexual harassment can specifically include but is not limited to: unwelcome sexual flirtations, advances, or propositions; requests for sexual favors; verbal abuse of a sexual nature, obscene language, off-color jokes, verbal commentary about an individual's body, sexual innuendo, and gossip about sexual relations; the display of derogatory or sexually suggestive pictures, posters, cartoons, drawings, or objects, or suggestive notes or letters; visual conduct such as leering or making gestures; sexually suggestive comments about an individual's body or body parts, or sexual degrading words to describe an individual; unwelcome touching of a sexual nature such as patting, pinching or brushing against another's body; any other physical or verbal conduct of a sexual nature by supervisors, fellow coworkers, or others in the workplace; sending offensive e-mails to coworkers with sexually suggestive comments or sexually degrading words; and viewing inappropriate materials such as pornography in the workplace or during work hours.

2. Harassment on the basis of any protected characteristic is strictly prohibited. In general, statements or physical conduct relating to a person's race, color, creed, religion, sex, national origin, age, pregnancy, disability, veteran status, marital status, sexual orientation, gender identification, or any other status which is protected by applicable law constitutes harassment when it:
 - a. has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
 - b. has the purpose or effect of unreasonably interfering with an individual's work performance; or
 - c. otherwise adversely affects an individual's employment pursuant to applicable law.
3. Harassing conduct includes, but is not limited to: epithets, slurs, or negative stereotyping; threatening, intimidating, or hostile acts; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace.
4. All supervisors are responsible for assuring that no employee is unlawfully discriminated against or subjected to conduct that constitutes sexual or any other form of harassment.
5. An individual found to have engaged in inappropriate conduct, including discrimination, sexual harassment, or any other form of unlawful harassment, will be disciplined as appropriate, up to and including discharge.
6. Any employee who believes that he or she has been the subject of inappropriate conduct, including discrimination, sexual harassment, or any other form of harassment, or who has observed any such conduct should, and is strongly encouraged, to immediately bring the matter to the attention of any supervisor, any executive or any human resources employee. Alternatively, you may contact the Open Door Hotline, 877-687-2338.
7. Any complaint of harassment or discrimination should include details of the incident(s) or conduct, names of individuals involved, and the names of any witnesses. Supervisors and managers should immediately refer all harassment complaints to Human Resources.
8. If at any time an employee feels their report of discrimination and/or harassment is not being properly addressed, they are free, and strongly encouraged, to make an additional report to any of the individuals or the Open Door Hotline identified above.

9. A prompt and thorough investigation of the alleged discrimination and/or harassment will be conducted, and appropriate corrective and/or disciplinary action will be taken, if warranted. Complaints will be treated as confidential to the extent possible.
10. Refusal to cooperate in an investigation of harassment or discrimination or initiating a complaint in bad faith is also prohibited and may result in disciplinary action, including termination.
11. The Company will not in any way retaliate against an employee, applicant, or former employee who, in good faith, makes a complaint or report of discrimination or harassment, or participates in the investigation of such a complaint or report. Retaliation against any individual for reporting a claim of harassment or cooperating in the investigation of same will not be tolerated. Retaliation includes any adverse employment action because the employee complained about or resisted harassment, discrimination, or retaliation, or has cooperated in an investigation.
12. Any employee who believes that he or she has been retaliated against should immediately report it using the reporting procedure described above. Any report of retaliation by the one accused of discrimination or harassment, or by any other employee, including supervisors or managers, will also be promptly and thoroughly investigated in accordance with the procedures outlined above. If a complaint of retaliation is substantiated, appropriate corrective and/or disciplinary action will be taken.

The contact information for the federal and state agencies that enforce the laws against unlawful discrimination and harassment in the states of California, Maine, Massachusetts, Rhode Island, and Vermont and for government contractors are listed in Appendix 1 to this Handbook. Please understand utilizing the Company's reporting procedures set forth above does not prevent you from filing a complaint with a federal or state agency.

Immigration Law Compliance

MV complies with the applicable immigration laws where it does business, including with the Immigration Reform and Control Act of 1986. MV is committed to employing only United States citizens and aliens who are authorized to work in the United States.

As a condition of employment, each new employee must properly complete, date, and sign the first section of the United States Citizenship and Immigration Services Form I-9. Newly rehired employees must also complete the form if they have not previously filed an I-9 with this organization, if their previous I-9 is more than three years old, or if their previous I-9 is no longer valid.

Open Door Policy

As a MV employee, you've joined an organization that places high value on customer service. That same high value is placed on employees. You will find your supervisor values you as an employee and is there to help guide and assist you in performing your role.

We challenge ourselves to take the initiative and be part of the solution. Anytime you have a suggestion or idea to make things better or a concern or complaint about the way things are done, discuss it with your supervisor or any member of management. Your input is a valuable part of our success.

We are committed to addressing workplace concerns and issues important to you. If a situation arises with your job, another employee, or customer that makes you uncomfortable, MV asks that you immediately bring it to our attention. If, for any reason, you do not want to discuss the situation with your supervisor or if you feel issues remain unresolved, you can contact another member of management or you can call our Open Door Hotline at 877-687-2338 or email us at employee.relations@mvtransit.com. You can also write to us at MV Transportation, 2711 N. Haskell Avenue, Ste 1500, LB-2, Dallas, TX 75204. Address your letter to the Chief Human Resources Officer.

You can be assured that such complaints will be investigated and that you will not be subject to any adverse action as a result of making a good faith complaint.

Introductory Period

The first ninety (90) days of employment are an introductory period. The period is an essential part of the training and evaluation process and is used to ensure that each employee's performance meets the required standards. An introductory period may be extended at the discretion of the supervisor. However, because employment at MV Transportation is "at-will", both during and after the Introductory Period, the Company has no obligation to retain you either during or after you have completed your introductory period unless otherwise required by applicable bargaining agreement or by law.

Employment Categories

Full-time

Full-time employees are those who are regularly scheduled to work at least 30 hours or more per week. Generally, regular, full-time employees may be eligible for some or all of the Company's benefit plans, subject to the terms, conditions, and limitations of each benefit plan/program. For purposes of determining benefits eligibility, the definition or standard for full-time may be different.

Part-time

Part-time employees are those who are regularly scheduled to work less than 30 hours per week. This generally includes casual, occasional and on-call drivers and other staff. While part-time employees receive all legally mandated benefits (such as workers' compensation and Social Security benefits), they are generally ineligible for many of the Company's other benefit plans/programs.

Temporary

Temporary employees are those who are hired as interim replacements, to temporarily supplement the work force or to assist in the completion of a specific project. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not imply a change in employment status. Temporary employees retain such status unless and until notified of a change. The temporary employment relationship is an "at-will" relationship, regardless of whether an estimated duration of assignment exists. While temporary employees receive all legally mandated benefits (such as workers' compensation insurance and Social Security) they are generally ineligible for the Company's other benefit plans/programs.

Safety Sensitive Functions

While all employees are responsible for strictly adhering to all rules and policies affecting the safety of the workplace, our customers and employees, the following functions are considered to be "safety sensitive":

- Operating a revenue service vehicle, including when not in revenue service;
- Operating a non-revenue service vehicle, when required to be operated by a holder of a Commercial Driver's License;
- Controlling dispatch or movement of a revenue service vehicle;
- Maintaining (including repairs, overhaul and rebuilding) a revenue service vehicle or equipment used in revenue service

Thus, the following positions are "safety sensitive":

- Driver
- Mechanic and other maintenance personnel
- Reservationist (if performing safety sensitive functions)
- Dispatcher
- Road Supervisor
- Assistant, Maintenance, Operations, Safety or General Manager

Compensation and Payroll Practices

Wages and Benefits

Each location of the Company has a wage and benefit structure, which is subject to change. A printed summary is posted at each location setting forth the current wage and benefit information for your location and will be made available to you upon request. If you are covered by a collective bargaining agreement, it will describe the wages and benefits for members of the bargaining unit. Contact your General Manager or the Human Resources Department if you have any specific questions about your wages or benefits.

Payroll Status

Hourly employees

A hourly employee (whether full or part time) is paid for actual hours worked and is entitled to overtime pay in accordance with applicable state and federal laws.

Salaried employees

Salaried employees are generally not eligible for overtime pay and receive a weekly salary, regardless of the amount of hours they work that is paid every pay period.

Payroll Period & Pay Dates

For payroll purposes, the workday is defined as 12:01 a.m. to midnight and the workweek is defined as 12:01 a.m. Saturday to midnight the following Friday. Any type of paid time off is not counted as time worked for computing overtime.

Generally, payday is every other Friday unless otherwise required by bargaining agreement or state law. The specific pay dates for each division or location are posted on the employee bulletin board at that division or location. If a payday falls on a holiday, you will receive your payment on the preceding Thursday or the last business day before the holiday. Each payment covers work performed during the 14-day period ending the Saturday before payday. Direct deposit is available to all employees.

Time Recording

If you are an hourly employee, you must record the time you start work, the times you leave for and return from meal breaks, and the time you leave at the end of your working day. All employees are required to record time-off.

Hourly employees must accurately record all time worked and should not work any time that is not authorized by their supervisors. Do not start work early, finish work late, work during a meal break, or perform any other extra or overtime work unless you are directed to do so. If you have any questions about when or how many hours you are expected to work, contact your supervisor.

It is a violation of our policy for anyone to instruct or encourage another employee to work “off the clock,” to incorrectly report hours worked, or to alter another employee’s time records. If anyone directs or encourages you to work “off the clock,” incorrectly report your hours, or to alter another employee’s time records, you should report the incident immediately to your supervisor, any member of management, the Human Resources Department, or the Open Door Hotline at 877-687-2338.

When your employment begins, you will receive instructions on how to record your time. Your immediate supervisor or manager must authorize your time record.

Overtime

Hourly employees will be paid overtime **pay (generally, time and one-half their regular rate of pay)** for all hours worked in excess of 40 **hours** in one workweek and as otherwise required by applicable state, federal, or local law (including without limitation daily overtime **and double time as** required by state or local law). **Hours for which you are paid pursuant to the Company’s PTO, Vacation, Holiday Pay, or other applicable policies will not be used for purposes of calculating overtime. The Company prohibits “comp time” as a replacement for overtime pay for hourly employees.** All overtime work must be authorized in advance. Although employees will be paid for all hours worked, including any overtime, working overtime without prior authorization may result in disciplinary action.

Salaried employees are expected to work as much of each workday as is necessary to complete their job responsibilities. No overtime is provided to **salaried** employees, **unless required by applicable law.**

Reporting Errors

MV Transportation takes all reasonable steps to ensure that employees are properly classified, paid for all hours worked, receive the correct amount of pay in each pay check, and paid promptly. If a mistake does occur and is called to the Company's attention, corrections will be made promptly. The Company has an internal complaint procedure for any employee who believes they have not been properly compensated. Employees who believe they have been erroneously compensated must immediately notify the Payroll or the Human Resources Department or utilize any other reporting procedure set forth in this handbook. The Human Resources department will share the results of its investigation with the employee and immediately take any necessary corrective action. Employees are free to utilize this reporting procedure without fear of reprisal or retaliation. An employee who believes they have been retaliated against for reporting a compensation error should immediately report such a belief to the Human Resources department or the Open Door Hotline at 877-687-2338.

Pay Adjustments

Operators and other division-based hourly jobs typically are considered for pay adjustments tied to an anniversary date or other due date and are effective on the first day of the pay period following the anniversary date and/or due date.

Operator Payroll Procedures

MV has adopted procedures that govern compensation for operators including rate of pay, hours of work, training time, non-revenue and revenue work. Please refer to the policy posted at your division for additional information.

Payroll Deductions

The law requires that the Company make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. It is your responsibility to complete your W-4 form properly to ensure the proper amount of taxes are withheld.

The Company offers programs and benefits beyond those required by law. Eligible employees may voluntarily authorize deductions from their pay to cover the costs of participation in these plans/programs, such as health insurance or 401(k). Payroll deductions may also occur in other circumstances, such as court ordered garnishments, pre-authorized deductions for uniforms or voluntary written authorization.

Salaried employees' pay will not be "docked," or subject to deductions, in violation of salary pay rules issued by the United States Department of Labor and state government, as applicable; however, the Company may make deductions from employees' salaries in a way that is permitted under federal and state wage and hour rules. Employees will be reimbursed in full for any isolated, inadvertent, or improper deductions, as defined by law.

If concerns about any salary pay deductions arise, employees should discuss and resolve them with their supervisor or the Payroll Department or utilize any other reporting procedure set forth in this handbook.

Compensation for Meetings/Training/Drug Testing

Hourly employees will be paid their regular hourly rate for meetings, training and/or drug testing during regular work hours and a training rate for attendance occurring outside regular work hours. If an employee's job classification does not have a specified training rate, the training rate is the applicable minimum wage.

Travel Time

Unless applicable law provides otherwise, hourly employees are paid their regular hourly rate for travel that occurs during their regular work hours. For travel outside regular work hours, travel time is paid at the applicable minimum wage. The Company will follow all applicable state or federal laws in determining whether travel time is treated as hours worked.

Length of Service

An employee's start date, the date on which an employee began to receive wages, is considered their "date of hire". MV will bridge an employee's length of service if they voluntarily resigned, were in good standing when they resigned and return to the Company within 90 days of their resignation date.

What to Do If You Have Questions about Compensation and Payroll Practices

If you have any questions, concerns, comments, or complaints related to your compensation or the Company's payroll practices, please direct those comments to your supervisor, any executive, the Payroll department, or the Human Resources department. You may also contact the Open Door Hotline at 877-687-2338.

Hours of Work

Work Schedules

Work schedules for employees vary throughout the Company. Supervisors will advise employees of their individual work schedules. Staffing needs, operation demands, and client service requirements may require variations in the total hours that may be scheduled each day and week. The Company does not guarantee hours of work or schedules.

Rest and Meal Periods

The Company complies with federal and state legal requirements concerning meal and rest periods, and you will be provided with meal and rest periods in accordance with applicable law. If you have any questions concerning the meal and rest break requirements for the location at which you work, please contact the Human Resources Department.

Attendance and Punctuality

To maintain a productive work environment, the Company expects employees to be reliable and punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on the Company. All MV employees are required to report to work on time every day they are scheduled to work.

Salaried employees

If an employee is unable to report to work or will be reporting after a scheduled starting time for any reason, absent extenuating circumstances, the employee should personally call their supervisor. If their supervisor is unavailable a member of management or the Human Resources Department should be contacted. Messages should not be left with other employees. Absent extenuating circumstances, you must call in on any day you are scheduled to work and will not report to work.

Excessive absenteeism or tardiness may result in disciplinary action up to and including termination of employment. Each situation of absenteeism or tardiness will be evaluated on a case-by-case basis. Even one unexcused absence or tardiness may be considered excessive, depending upon the circumstances. Absent extenuating circumstances, an employee who fails to personally call their supervisor for two or more days to report absence will be considered to have abandoned and voluntarily terminated their employment.

Hourly Employees

The following applies to all non-introductory period employees and is based on a rolling twelve (12) month time period:

The policies outlined in this section do not limit the employee's and the Company's right to end the employment relationship at any time, for any reason not prohibited by law, with or without cause, and with or without notice unless otherwise required by the applicable bargaining agreement.

Excused Absence

Excused absences are approved requests for family medical leave (FMLA), kin care (if required by state law), personal leave, jury and/or witness duty, military, bereavement, pre-arranged vacation days or any other leave protected by law. Attendance points are not issued for excused absences.

Pre-arranged vacation days will be excused if:

- 1** - A MV "Request for Time Off" form is completed and approved by the Operations Manager, General Manager or Regional Vice President.
- 2** - These steps are completed per the division's advance notice policy.

Unexcused Absence

Absenteeism is measured in points. Employees are required to call in for each day of work missed. All employees who will be absent or tardy are required to notify their supervisor or dispatch at least one (1) hour prior to the start of their shift. Notwithstanding the situations described below, if an absence occurs, or an employee fails to call within the appropriate time, because of a FMLA qualified serious medical condition, the employee's absence will not count as a point.

- An unexcused absence, where the employee calls in at least one (1) hour prior to the start of his/her shift, is counted as one (1) point.
- Unexcused absences up to three (3) consecutive days are counted as one (1) point, provided proper notice is given. After day three (3), each day of absence is counted as one (1) point unless the employee provides a doctor's note excusing the absence for up to a total of ten (10) days. After ten (10) days, each day absent will be counted as one (1) point. Absences exceeding ten (10) days may be considered for a leave of absence.
- Calling in less than one (1) hour in advance of your start time to report an absence or tardy is counted as one and one-half (1 ½) points.
- Failure to call more than one (1) hour after the start of a scheduled shift for a scheduled shift (No Call/No Show) is counted as four (4) points.
- A failure to complete the entire shift is counted as one (1) point.
- Missing a required meeting is counted as one (1) point.

Tardiness

- Arriving to work up to 15 minutes after your scheduled reporting time either for shift start or returning from rest or meal breaks is one-half (1/2) point.
- Reporting to work more than 15 minutes after a scheduled reporting time either for shift start or returning from rest or meal breaks will be counted as one (1) point.
- If an employee is tardy for their shift, the shift may be re-assigned and the employee sent home.

Disciplinary Guidelines for Attendance

All non-exempt employees will be issued an Employee Attendance Report documenting each occurrence.

Violations of more than one component of the attendance policy, will receive a single point assessment of the highest value.

Employees are allowed a maximum of seven (7) points within a rolling 12-month period before a written warning is issued. Points are removed from the employee's record 12 months after they are issued. If an employee reaches ten (10) points within a rolling 12-month period, he/she will be terminated.

Clean Slate

If an employee goes "point free" for a consecutive six (6) month period, his/her attendance record will be wiped clean and any prior points will not be considered as a basis for disciplinary action.

Company Meeting Attendance

We require that all employees attend Company operations meetings, which include the monthly safety meetings. Failure to attend a mandatory Company meeting will result in one attendance point.

Attendance Policy for Non-Exempt Introductory Employees

MV expects new employees to demonstrate excellent attendance during their introductory period. Introductory period employees are permitted no more than one (1) point using the guidelines set above.

Attendance Policy for Exempt Employees

Due to the nature of exempt or salaried work, exempt employees are not subject to the Attendance/Tardiness Policy. Exempt employees are expected to maintain good attendance and complete all work assignments and meet the requirements of the position.

Job Abandonment

Unless otherwise prohibited by applicable law, an employee who does not report for three consecutive days' scheduled shifts and does not contact the Company during this time period will be considered to have voluntarily resigned his or her position.

Emergency Closings and Seasonal Work

Emergency conditions, such as severe weather, fire, flood, or earthquake, can disrupt Company operations and interfere with work schedules, as well as endanger employees' well-being. These extreme circumstances may require the closing down of operations partially, or business altogether. Time off due to emergency closings is generally unpaid.

Due to seasonal or holiday fluctuations of business, it is sometimes necessary to reduce hours below the normal level of hours worked. When this is necessary, such reductions will be based on certain factors, including but not limited to agency and client schedules, as well as driver seniority. Drivers should expect such slowdowns to include, but not be limited to, summers and seasonal holidays such as Thanksgiving or Christmas.

Employee Benefits

Health, Dental and Vision Insurance

Eligible, full-time employees are currently offered health, dental and vision insurance benefits as required by federal law and in accordance with the requirements of the plans. The details of those benefits, including eligibility requirements, are set forth in the plan documents themselves, and coverage and rates are subject to change periodically.

401(k)

Eligible, full-time employees may currently participate in the Company's 401(k) plan. The plan documents govern the terms of the plan. If you would like information concerning the Company's 401(k) plan, please contact the Human Resources Department.

Paid Time Off

Full-time employees are eligible to accrue Vacation or paid time off ("PTO"), subject to the applicable waiting period. Each location has its own accrual program for vacation or PTO. Please check with your manager or the division wage and benefit sheet for your vacation or PTO accrual rate and more specific information regarding the terms and conditions associated with the vacation or PTO program for your location. Vacation or PTO accrual is capped at 120 hours for hourly employees and 160 hours for salaried employees, unless otherwise regulated by state or other law. Unless prohibited by applicable law, vacation or PTO accrual will be suspended once the cap is reached, and accrual will begin again once vacation or PTO is used and the balance drops below the cap. Generally, employees should notify the division of the request to use vacation or PTO in accordance with the division's advance notice policy. In the absence of an advance notice policy, employees should provide as much notice as possible for planned absences and no less than one week's notice. In the event of unforeseeable circumstances, a shorter notice period may be acceptable. If a request for vacation or PTO is not approved and the employee is absent from work during that period, the employee is subject to discipline and may not be paid for that time off.

At the time of separation of employment, an employee will be paid all accrued and unused vacation or PTO, only if state or other applicable law requires that the Company pay the employee for accrued and unused vacation or PTO.

Vacation Cash-Out Policy

Drivers may cash out vacation pursuant to their division's cash out policy.

Paid Holidays

Full-time employees are eligible for paid holidays, subject to the applicable waiting period. The list of paid holidays and any applicable waiting period are posted at each facility. Holiday pay will only be paid to a non-exempt employee if the employee has worked his/her scheduled work day preceding the holiday and has worked his/her scheduled workday following the holiday.

If a paid holiday falls on an employee's day off or an employee is required to work on a holiday, the employee may receive an alternative day off or holiday pay, depending on the location's policy.

If a holiday falls during any unpaid time off (leave or vacation for example), the employee will not receive holiday pay.

Leave Policies

The Company provides all leaves required by applicable federal, state, or other applicable law, including the following types of employee leaves listed below. Any unpaid leave of absence in excess of 30 days may impact vacation accrual, healthcare benefits and length of service for seniority or bidding purposes. Please see your manager for a copy of this policy which is also available on Portal or Sharepoint.

In addition to the leaves listed below, many states have created other protected leaves. Please see your state addendum for information regarding additional leaves available under state law.

All applicable leaves run concurrently. For example, if an employee takes time off for a serious health condition that resulted from a work-related injury, the workers' compensation leave, state and federal family medical leave, if applicable, begin on the first day of absence.

Additional leaves of absence, other than those identified below, may be requested and will be considered on a case-by-case basis.

To the extent that any provision of this Leave Policy conflicts with any federal, state, or local law, the Company will follow all applicable laws irrespective of this policy and employees will be granted leave in accordance with all applicable laws. Where greater benefits than those described herein are required under applicable law, employees will receive those benefits.

IF YOU BELIEVE THAT YOU REQUIRE A LEAVE OF ABSENCE, PLEASE SEE YOUR STATE ADDENDUM AND CONTACT THE HUMAN RESOURCES DEPARTMENT AS SOON AS POSSIBLE FOR SPECIFIC INFORMATION REGARDING THE LEAVE POLICIES WHERE YOU ARE LOCATED. IF YOU BELIEVE YOU HAVE BEEN UNLAWFULLY DENIED LEAVE THAT YOU ARE ENTITLED TO UNDER APPLICABLE LAW, YOU MUST CONTACT THE

HUMAN RESOURCES DEPARTMENT OR UTILIZE ANY REPORTING PROCEDURE SET FORTH IN THIS HANDBOOK.

Workers' Compensation

MV purchases Workers' Compensation Insurance for employees who incur a work-related injury or illness. Any illness or injury to an employee, regardless of severity, that occurs while on the job must be reported. Any employee who has suffered a work related injury or illness has the right to make a workers' compensation claim. The employee may then be sent to a Company approved medical facility for treatment or examination, which may determine whether follow-up care is necessary. While on Workers' Compensation leave or while on a Temporary Modified Work assignment, employees shall conform to all applicable rules, policies and procedures. Employees will not be discriminated or retaliated against for presenting a Workers' Compensation claim, hiring a lawyer to represent the employee in the claim, commencing a proceeding before a worker's compensation board or commission, or testifying in such a proceeding.

Employees are required to fully cooperate with MV and MV's Workers' Compensation adjuster/administrator in the management of their claim. Failure to attend scheduled medical appointments without a reasonable basis may result in employee being sent home without pay pending an updated work status.

All employees who are involved in a workplace accident or incident resulting in property damage or any person being required to obtain medical attention will be subject to a drug and alcohol test (if allowable by state or other applicable law) and may be placed on unpaid "safety leave" until the results of the test are known.

Temporary modified work may be offered to those employees who have sustained a compensable workers' compensation injury and who have been released by an authorized health care provider to return to work with medical and/or physical restrictions. Temporary modified work may be assigned for up to 26 weeks per claim.

The Company may establish the temporary modified work day and work week based on the restrictions set forth by the authorized health care provider. Temporary modified work days shall not exceed 8 hours per day or 40 hours per week to ensure temporary modified duty employees do not work overtime.

Prior to acceptance of temporary modified work, the employee shall be furnished a written temporary modified work offer indicating the temporary modified work duties. Employees accepting this work shall receive their normal regular hourly rate of pay for the temporary modified work they perform. Please see your manager for a copy of this policy which is also available on Portal or Sharepoint.

Prior to returning to full-duty work, employees may, depending on circumstances or the nature of the injury, be subject to a return-to-work medical examination by a Company-approved doctor.

Reporting Employee Injuries or Illnesses

Employees are required to immediately report, as soon as possible, unless in the circumstances it would not be reasonable to do so, all on-the-job injuries and illnesses to their General Manager, Safety Manager, Dispatcher or immediate supervisor. Failure to timely report any incident, regardless of whether or not it results in injury or property damage, may result in disciplinary action up to and including termination. Please see our Safety Policy for more information on Incidents and Incident Reporting.

Family and Medical Leave

Employees have rights to family and medical leave under the Federal Family and Medical Leave Act of 1993. The Company provides Family and Medical Leave in accordance with both federal and any state or other applicable law.

Eligibility for Family and Medical Leave.

Employees who have worked at the Company for at least 12 months, who have worked at least 1,250 hours during the previous 12 months, and who work at a location where at least 50 employees are employed by the Company within 75 miles are eligible for Family and Medical Leave. Where the Company has assumed an existing contract, the time an employee has worked for a previous contractor is considered in this calculation.

Types of Family and Medical Leave Available.

State and federal laws allow Family and Medical Leave for various reasons. Because an employee's rights and obligations may vary depending upon the reason of the Family and Medical Leave, it is important to identify the reason for the leave. Family and Medical Leave is available for the following reasons:

- The birth, adoption, or foster care of an employee's child within 12 months following the birth or placement of the child ("Bonding Leave").
- To care for an immediate family member (spouse, registered domestic partner, child or domestic partner's child, or parent with a serious health condition) ("Family Care Leave").
- An employee's inability to work because of a serious health condition ("Serious Health Condition Leave"), as defined by law.
- A "qualifying exigency," as defined under the FMLA, for military operations arising out of a spouse's, child's or parent's Armed Forces (including the National Guard and Reserves) active duty or call to active duty in support of a "contingency operation" declared by the U.S. Secretary of Defense, President, or Congress, as required by law. ("Military Exigency Leave").

- To care for a spouse, child, parent, or next of kin (nearest blood relative) who is (a) an Armed Forces member (including the National Guard and Reserves) undergoing medical treatment, recuperation, or therapy, is otherwise in an outpatient status, or is otherwise on the temporary disability retired list with a serious injury or illness incurred or aggravated in the line of duty while on active duty that may render the individual medically unfit to perform his or her military duties, or (b) a person who, during the five (5) years prior to the treatment necessitating the leave, served in the active military, Naval, or Air Service, and who was discharged or released therefrom under conditions other than dishonorable (a "veteran" as defined by the Department of Veteran Affairs) and who has a serious injury or illness incurred or aggravated in the line of duty while on active duty that manifested itself before or after the member became a veteran ("Service Member Family Leave".)

How and When to Request Leave.

If you need Family and Medical Leave, you must provide the Company notice of the need for leave. To request foreseeable leave (such as following the birth of a child or for planned surgery), you should fill out an Application for Leave of Absence form, which is available from Human Resources at least 30 days in advance and submit the form to your Division Manager. When the need for leave is not foreseeable, you must give notice as soon as possible and, if possible, the notice should be in writing. Any request for leave should provide the Company with enough information to determine whether the leave qualifies as Family and Medical Leave.

Medical Certification Requirement.

If your leave is due to a serious health condition, either your own or a family member's, you will be required to furnish Medical Certification from a health care provider. Medical Certification forms are available from Human Resources. Failure to provide the required certification may result in the delay, denial, or cancellation of leave. If the certification shows that your absence does not qualify under the FMLA, the FMLA designation will be revoked retroactive to the first day of your leave and you may be subject to MV's attendance policy. The Company may require recertification during your leave.

At the Company's expense, the Company may also require a second or third medical opinion regarding your own serious health condition. Employees are expected to cooperate with the Company in obtaining additional medical opinions that the Company may require.

When leave is for planned medical treatment, you must try to schedule treatment so as not to unduly disrupt the Company's operation. Please contact the Human Resources department prior to scheduling planned medical treatment.

For *Military Exigency Leave*, employees are required to provide: (a) as much advance notice as is reasonable and practicable under the circumstances; (b) a copy of the covered military member's active duty orders when the employee requests leave; and (c) a completed Certification of Qualifying Exigency form within 15 calendar days, unless unusual circumstances exist to justify providing the form at a later date. Certification forms are available from the Human Resources department.

Absent unusual circumstances, failure to comply with these notice and certification requirements may result in a delay or denial of the leave. If you fail to return to work at your leave's expiration and have not obtained an extension of the leave, the Company may presume you do not plan to return to work and voluntarily terminate your employment.

Amount of Leave Available.

The maximum amount of FMLA Leave will be twelve (12) workweeks in any 12-month period when the leave is taken for: 1) Bonding Leave; 2) Family Care Leave; 3) Serious Health Condition Leave; and/or 4) Military Exigency Leave. However, if both spouses work for the Company and are eligible for leave under this policy, their leave may be limited to a combined total of 12 weeks if the leave is taken for Bonding Leave or Family Care Leave, under certain circumstances. A 12-month period begins on the date of your first use of FMLA Leave.

The maximum amount of Family and Medical Leave for an employee wishing to take Service Member Family Leave will be a combined leave total of twenty-six (26) workweeks in a 12-month period.

EXAMPLE: You take 12 workweeks off to bond with a newly adopted child. Later, in that same 12-month period, you wish to take time off from work to care for a spouse, child, parent or next of kin under the Service Member Family Leave provision of this policy. Because the law allows extra time off for Service Member Family Leave, you will be allowed to take this time off, so long and the total amount of leave does not exceed 26 workweeks.

If both spouses work for the Company and are eligible for leave under this policy, the spouses may be limited to a total of 26 workweeks off between the two when the leave is for Service Member Family Leave only or is for a combination of Service Member Family Leave, Bonding Leave and/or Family Care Leave.

Under some circumstances, you may take Family and Medical Leave intermittently – which means taking leave in blocks of time, or by reducing your normal weekly or daily work schedule.

How the Amount of Leave is Calculated.

The Company will calculate Family and Medical Leave on a "rolling 12-month basis." This means that the 12-month period is measured backwards from the date an employee uses any Family and Medical Leave. Each time an employee

takes Family and Medical leave, the remaining leave entitlement would be any balance of the 12-week annual entitlement (or 26 weeks, if applicable) that had not been used during the immediately preceding 12 months.

Benefit Continuation.

During Family and Medical Leave, your group health insurance will be maintained under the same conditions as if you were working. If you are on paid leave, your share of the premium, if any, will be deducted from your pay. If you are on unpaid leave, you must make the premium payments yourself on a monthly basis. If employee premium payments are more than 30 days late, insurance coverage may be terminated. You will be required to reimburse the Company for any premium payments you missed that the Company pays on your behalf.

You will not continue to accrue vacation or PTO while on unpaid Family and Medical Leave.

Reinstatement.

Under most circumstances, you will be reinstated to the same position held at the time of the leave or to an equivalent position with equivalent pay, benefits, and other employment terms and conditions. However, because the maximum entitlement under the FMLA is 12 weeks (or 26 weeks for Service Member Family Leave), this right to reinstatement will not apply to leaves that continue after the amount of leave you are entitled to is exhausted. Additionally, an employee has no greater right to reinstatement than if the employee had been continuously employed rather than on leave.

"Key employees," as defined by law, may be subject to reinstatement limitations in some circumstances. If you are a "key employee", you will be notified of the possible limitations on reinstatement at the time you request a leave.

Pay Status.

Family and Medical leave is generally unpaid leave. However, if you have any accrued PTO, you may be required to use that accrued time. Under these circumstances both the paid and unpaid leave count as Family and Medical Leave.

You may be eligible to receive benefits through State-sponsored, Company-sponsored, or some other wage-replacement benefit programs.

Fitness for Duty.

If you are taking medical leave due to your own serious health condition, you must provide a return to work release from your health care provider before you return to work. The return to work statement should be submitted to the Leaves Manager in the Benefits Department. Employees returning to work after 30 days or more break in service will be required to undergo a background check, return-

to-work physical and drug test, as permitted or required by applicable federal or state law which includes but is not limited to regulations and requirements set forth by the DOT, FTA, FMCA, OSHA and ADA.

Status Update.

While you are on leave, the Company may require you to periodically confirm your status and your intention to return to work. Any employee who decides while on leave that he or she will not be returning to work at the end of the leave should immediately inform the Company.

Fraudulent Use of Leave.

If the Company determines that an employee has obtained leave or continued to take leave under the state or federal family and medical leave laws based on fraudulent, dishonest or misleading conduct of any kind, the employee will be subject to immediate termination.

A Notice to Employees of Rights Under FMLA is attached to this policy, as Appendix 2.

Bereavement

If an employee wishes to take time off due to the death of an immediate family member, the employee should notify his or her supervisor immediately. Immediate family member is defined as spouse, domestic partner, child, domestic partner's child, sibling, parent (or person who raised you), grandparent or grandchild. Hourly employees may be granted unpaid time off of up to one week for bereavement leave. See your division or location for specific policies regarding bereavement leave. Salaried employees may take paid time off of up to three days (five days if air travel is required) for bereavement leave.

Jury Duty

A leave of absence will be granted if an employee is required to appear for jury duty. An employee must notify their supervisor immediately upon receipt of your selection notice. Exempt employees are entitled to full pay for each day of jury duty or service as a witness if they work anytime during the week of jury duty. If no work was performed during the week, the employee will not be compensated. Unless applicable law provides otherwise, non-exempt employees will not be compensated; however, the absence will be considered excused and the employee will continue to accrue other benefits, such as vacation or PTO. Employees may use any accrued vacation or PTO for the period of the jury duty leave. Employees are expected to report to work whenever the court schedule permits.

Administrative Leave

Unless prohibited by law, employees are required to report any life event that could potentially disqualify them from employment based on our Qualification standards. The employee may be placed on unpaid administrative leave until a final disposition has been provided by the appropriate authoritative agency.

Employee Performance and Conduct Policies

Performance Appraisals

Exempt employees and non-exempt staff employees will ordinarily be reviewed annually during a common review date of January 1. The appraisal will be discussed in a meeting between the employee and the supervisor. The supervisor and employee will review the job requirements, performance objectives, or other performance criteria. A performance rating will be assigned and an annual pay review may be provided.

Conflicts of Interest

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. Our Code of Conduct outlines our policies regarding conflicts of interest.

Reference Checks

No employee may provide a reference check, letter of reference, verification of employment or disclose any performance or employee information to any outside party at any time on either a current or past employee. All requests for reference checks or verifications of employment must be forwarded to Human Resources at the Support Center. The Company only provides confirmation of employment, dates of employment and position held. No performance or termination information may be disclosed.

Outside Employment

An employee may hold a job with another organization as long as he or she satisfactorily performs his or her job responsibilities with the Company. Employees should consider the impact that outside employment, whether paid or voluntary, may have on their health and physical endurance. All employees will be judged by the same performance standards and will be subjected to the scheduled needs of our clients, regardless of any existing outside work requirements. In some divisions, operators are required to report hours worked as a driver for another employer on a daily basis. Under certain circumstances a log may be required. Your General Manager has more information.

Hiring of Relatives

MV Transportation is a family oriented company and encourages family and friends of employees to consider making MV their company too. However, relatives in the same area of the company may not supervise each other or direct each other's work. Exceptions to this policy must be approved by the Chief Human Resources Officer.

Anti-Fraternization Policy

In order to promote the efficient operation of the Company's business and to avoid misunderstanding, complaints of favoritism, other problems of supervision, security, and morale, and possible claims of sexual harassment, members of management and supervisors are forbidden to date or pursue romantic or sexual relationships with employees whom they supervise, directly or indirectly. Employees who violate this guideline will be subject to discipline, up to and including termination of employment.

Confidentiality and Proprietary Information

During the course of employment, employees may receive and have access to confidential information. All employees are expected to respect and maintain the confidentiality of employee and customer records, business records, data and other information not otherwise available to the public. Upon separation of employment, an employee must return all documents, records, or any property that belongs to the Company or is related to Company business. Any programs, writings, or other material developed by an employee as part of his or her work at the Company is property of the Company.

The protection of confidential business information during and after your employment is important to the interests and the success of this Company. Such confidential information includes, but is not limited to the following examples:

- Technological Data
- Operations Data: customer lists, trip sheets, financial & billing information, schedules, dispatch logs, policy or program manuals
- Marketing plans and strategies, or project plans or proposals
- Personnel or labor information such as names, titles, employee phone numbers, medical and benefit information, training materials or labor relations strategies

Nothing in this policy, however, should be construed to prohibit employees from discussing their terms and conditions of employment amongst themselves.

Electronic Data Systems Policy

The Company maintains a computer system, a voice-mail system and an e-mail system to assist employees in conducting Company business. These systems, including the equipment and data stored in the systems, are the exclusive property of the Company. As such, all messages created, sent, received or stored in these systems are and remain the property of the Company.

The Company's e-mail and computer systems and resources are not to be used for any non-business purposes, entertainment, personal communications and other personal use or any illegal, harassing, inappropriate, pornographic, libelous or obscene purpose during or outside work hours. The only exception is for limited personal uses, subject to the limitations and guidelines set forth in this Handbook and of the Internet, Newsgroup and Electronic Mail Policy. This policy allows for reasonable personal use of the internet during an employee's own time (non-working time), for example at the beginning of the day, during the lunch break and again at the end of the working day, and so long as it does not interfere with your work and/or the work of other employees. The Company's electronic data systems may not be used to solicit or proselytize for commercial ventures, religious or political causes, outside organizations, or other non-job-related solicitation.

Because the computer systems and resources remain Company property, employees should have no expectation of privacy with regard to these systems and resources. All computers and Company equipment are subject to search at any time. Additionally, MV reserves the right to discontinue an employee's access to any computer systems and resources at any time.

The Company reserves the right to access, read, review, and monitor all messages, images, programs, files, and content on the Company's email, voicemail, computer and internet systems, and employees should have no expectation of privacy in this regard. You are advised that any incidences of inappropriate use may result in disciplinary action up to and including termination of employment.

Examples of 'inappropriate usage' would be:

- visiting sites with sexual or offensive context
- transmitting, receiving, viewing, or storing words or images of a discriminatory or harassing nature or that are obscene, vulgar, derogatory, or inflammatory
- excessive personal use of the internet during working hours
- any usage, including, streaming radio, music and video, with legal implications such as copyright and performing rights
- any use that would violate any Company policy or rule or any federal, state, or local law

The above are illustrative examples, and are not intended to be exhaustive.

Employees are prohibited from downloading or uploading “executable” files, music, videos, or any software without advance written approval by the Director of Information Technology. Additionally, employees are prohibited from copying software without advance written approval by the Director of Information Technology.

Please see the Internet, Newsgroup and Electronic Mail Policy for more detail.

Software Code of Ethics

Unauthorized duplication of copyrighted computer software violates the law and is contrary to our organization’s standards of conduct. The Company prohibits all copying or pirating of software, and the use, duplication, or dissemination of copyrighted materials in violation of copyright laws is prohibited. The Company recognizes the following principles as a basis for preventing its occurrences:

- Employees are prohibited from making or using unauthorized software copies under any circumstances.
- Employees must comply with all license or purchase terms regulating the use of any software we acquire or use.
- Employees must comply with, and enforce, MV’s internal controls to prevent the making or using of unauthorized software copies, including effective measures to verify compliance with these standards and appropriate disciplinary measures for violation of these standards.

Social Media Policy

The Company respects the legal rights of its employees and understands that employees' time outside of work is their own. However, employees should be mindful that their social media activity, even if done off premises and while off-duty, could affect the Company's legitimate business interests. For example, the information posted could be the Company's confidential business information. In addition, some readers may mistakenly view you as a spokesperson for the Company. Consequently, social media activity is a legitimate and proper focus of Company policy.

This Social Media Policy (the "Policy") provides guidance on responsible social media activity by employees. This Policy does not and cannot cover every possible social media activity. If you are unsure how this Policy may apply to your social media activity, the Human Resources Department is here to help you. For purposes of this Policy, "social media activity" includes all types of posts and other communications on the Internet, including but not limited to, posts on social networking or affinity sites (such as Facebook, LinkedIn, and Tumblr); blogs and other on-line journals and diaries; bulletin boards and chat rooms; microblogging, such as Twitter; and posts of video or audio on media-sharing sites, such as

YouTube or Flickr. "Social media activity" also includes permitting, or failing to remove, posts by others where the employee can control the content of posts, such as on a personal page or blog.

Application:

This Policy applies to social media activity that relates in any way to the Company's business, employees, customers, vendors, or competitors or that identifies an employee's affiliation with the Company (other than as an incidental mention of place of employment in personal social media activity unrelated to the Company). This Policy applies to social media activity when on or off duty, while using the Company's or personal electronic resources, and whether or not the employee posts anonymously or using a pseudonym.

Guidelines:

The Company values its established brand reputation and good will relationships. These are important corporate assets. When you engage in social media activity that identifies you as a Company employee, or in any way relates to the Company, you should bear that in mind. Unless you have received prior authorization in writing from an authorized Company representative, you should not represent or suggest in any social media content that you are authorized to speak on the Company's behalf, or that the Company has reviewed or approved your content.

You may use the Company's electronic resources to engage in social media activity for non-business purposes during your own time (non-working time), so long as it does not interfere with your or your co-workers' job responsibilities, and complies fully with all Company policies. You may not maintain an open connection to, or stream, any social media site. Such non-business use is a privilege that may be withdrawn if abused.

Your social media activity is subject to all pertinent Company's policies, including, but not limited to the Code of Conduct, Equal Employment Opportunity, Confidentiality, Anti-Discrimination/Anti-Harassment Policy, and Electronic Data Systems Policy.

The Federal Trade Commission requires that endorsements be truthful and not deceptive. If your social media activity endorses the Company's products or services, i.e., expresses opinions, beliefs, findings or experiences concerning the Company's products or services, you must disclose your name and position with the Company.

You should not post content about the Company, management, co-workers, vendors, or customers that is vulgar, obscene, physically threatening, intimidating, defamatory, harassing, or a violation of the Company's policies against discrimination or harassment. You should not unlawfully disparage the

Company's products or services, or the products or services of its customers, vendors or competitors.

You should not use the Company's logo, trademark or proprietary graphics (collectively, "IP") for any commercial purpose, such as selling or advertising any product or service, without the Company's prior written consent. You should not use the Company's IP in a way which suggests that you are representing the Company or while engaging in conduct that violates Company policy.

You should not disclose, or post images or video of, any of the Company's trade secrets or confidential business information or of any confidential business processes.

You should not post images or video of the Company's employees, customers, vendors or competitors without their prior permission.

To reduce the risk of identity theft, stalking, and similar criminal conduct, you should not disclose personally identifying information (such as personal telephone numbers, Social Security numbers, the date of birth, credit or debit card numbers or financial account numbers) of the Company's employees, customers, vendors or competitors.

Consistent with applicable law, members of management should not gain unauthorized access to the restricted social media page of a subordinate. Any employee may reject, without fear of retaliation, any request from any other employee that, if accepted, would permit access to a restricted social media page - such as a friend or connection request.

Employees may not use their Company e-mail address to register for any social media account or site, or as an identifier needed to participate in any social media activity, except to engage in social media activity authorized by the Company and for the Company's business purposes. Employees may reference the Company as their employer and include contact information on social and professional networking sites only, such as LinkedIn and Facebook.

If you need clarification of any aspect of this policy, contact the Human Resources Department. You should report all violations of this policy to the Human Resources Department or utilize any reporting mechanism set forth in this handbook.

The Company will, in its discretion, review social media activity to the fullest extent permitted by applicable law.

Employees are solely responsible for their social media activity and will be held accountable for violating this Policy. Failure to comply with this Policy may lead to discipline, up to and including termination of employment, and if appropriate, the Company will pursue all available legal remedies. The Company also may report suspected unlawful conduct to appropriate law enforcement authorities.

The Company will not construe or apply this Policy in a manner that improperly interferes with or limits employees' rights under the National Labor Relations Act.

Workplace Violence

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

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

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

Weapons Policy

The Company is committed to ensuring the safety of our employees, customers, clients, contractors, and visitors. In furtherance of this commitment, the Company maintains a weapons-free workplace (except as otherwise provided by law) and strictly enforces the prohibition of the use, carrying, or possession of deadly weapons or destructive devices while on the Company’s property and/or while performing related work or duties for the Company. Employees are also prohibited from keeping or storing weapons or destructive devices in their vehicles in parking areas, unless state law requires that employees be allowed to store or transport certain types of firearms in their own locked vehicles in Company parking areas.

Examples of deadly weapons or destructive devices: firearms, including but not limited to, handguns, rifles, pellet guns, and similar devices; knives with the exception of pocket knives; instruments capable of inflicting a heavy blow, including, but not limited to, nightsticks, clubs and similar devices; explosive devices, including but not limited to bombs, grenades, and similar devices and other devices whose primary purpose is the infliction of bodily harm.

Although some states license individuals to carry concealed firearms, the Company prohibits them on Company property or while participating in work-related duties for the Company. A violation of this policy is considered gross misconduct and will result in immediate discipline and/or termination.

Customers, clients, contractors, or other visitors who violate this policy will be asked to immediately leave the Company's premises and may be subject to arrest and prosecution by law enforcement officials for any criminal acts.

Discipline

Any violation of MV Transportation policies or any inappropriate or improper behavior or conduct may warrant disciplinary action. Although the employment relationship may be terminated at will by the employee or the Company, without following any formal system of discipline or warnings, the Company may, in its discretion use progressive discipline. The progressive discipline system is intended to give the employee advance notice, whenever possible, of problems with their conduct or performance to provide the employee with an opportunity to correct their actions. Normally, progressive discipline involves verbal counseling and one or more written warnings, before an employee is terminated. However, deviations from progressive discipline may occur when serious offenses occur or circumstances warrant alternative measures in the Company's sole discretion. If your employment is governed by a valid collective bargaining agreement, discipline will be governed by that agreement.

Work rules are needed to ensure the safety and well-being of all employees. The purpose of Work Rules is not to punish employees; instead, it is intended to inform employees regarding expectations and provide a framework for coaching and counseling. The Company reserves the right to skip steps in the disciplinary process whenever it determines circumstances warrant. Work Rules are divided into two groups of offenses:

1. *Minor Violations* will usually be addressed in a four-step process (although the Company need not follow this sequence):
 - First violation – Counseling session/verbal warning
 - Second violation- written warning
 - Third violation – Final warning and/or unpaid suspension
 - Fourth violation – Termination
2. *Major Violations* will warrant disciplinary action up to a final warning and/or unpaid suspension, or termination.

Minor Violations

The Company need not follow any particular sequence of discipline and may impose immediate suspension or discharge where circumstances warrant. Violations may be personally observed or reported, or observed via DriveCam and Other Video Systems or Electronic Systems, including GPS and mobile data terminals. Examples of minor violations include, but are not limited to, the following types of workplace behavior.

1. Failure to follow work policies, procedures or duties
2. Failure to follow personal appearance standards
3. Use of abusive or profane language
4. Use of personal radios while operating a Company vehicle.
5. Eating or drinking while operating a Company vehicle.
6. Violation of the Internet, Newsgroup and Electronic Mail Policy, not considered to be a major violation

Major Violations

Major violations will result in termination or other serious discipline. Violations may be personally observed or reported, or observed via DriveCam and Other Video Systems or Electronic Systems, including GPS and mobile data terminals. Examples of major violations include, but are not limited to, the following types of workplace behavior:

1. Reporting to work or working under the influence, possessing alcohol or illegal drugs in the workplace, or any violation of MV's Drug and Alcohol Policy
2. Deliberately damaging or abusing property
3. Carelessness or horseplay resulting in property damage in excess of \$5,000 or personal injury
4. Insubordination, including the refusal and/or failure to follow a directive, to perform assigned work, or to encourage others to do either
5. Violation of confidentiality and proprietary information policy
6. Harassment prohibited by Company policies

7. Violations of State, Federal, County or Municipal laws, regulations or requirements that would disqualify you from employment under MV's hiring criteria, with the exception of moving violations while driving which are governed by the MV Safety Point System. Employees are required to report such arrests and/or convictions within 24 hours.
8. Additional violations of the MV Safety Policy, Attendance Policy, Substance Abuse Policy Violations, or misuse of Company vehicles and/or equipment, including but not limited to:
 - Operating without a valid license appropriate for that vehicle, equipment or service.
 - Driving on a suspended license
 - Driving a commercial vehicle without a valid medical card
 - Transporting school children without proper school bus certification as required by applicable law
 - Un-insurability as a vehicle operator
 - Negligent use of a Company owned or provided vehicle or equipment
 - Unauthorized use of a Company owned or provided vehicle or equipment including transporting unauthorized passengers
 - Use of a personal cell phone while operating a Company vehicle
9. Falsification of any records, such as medical forms, time records or employment applications, or making false statements
10. Unprofessional or disorderly verbal or physical conduct directed towards coworkers, passengers, clients or any third party while acting as a representative of the Company.
11. Engaging in a romantic or sexual relationship with a passenger who is unable to provide meaningful consent.
12. Entering a passenger's home while in service or in Company uniform without a legitimate business purpose
13. Possession of weapons or explosives on Company premises
14. Conviction of driving under the influence, reckless driving or hit-and-run driving whether on or off the job, in a Company or private vehicle, for employees performing safety sensitive functions

15. Use of Company property or Company garages for personal vehicle repair
16. Failing to pass initial, ongoing or changed qualification standards
17. Dishonesty, theft, or improper handling of company assets or cash
18. Gross negligence

Vehicle Citations

In addition to any potential safety point assessments, vehicle citations are the responsibility of the employee. MV will not pay for parking tickets or citations issued to Company vehicles or employees on Company time unless required by law. It is the responsibility of the employee to obey all traffic laws and to operate a vehicle in a safe and legal manner.

Personal Appearance

When at work, employees are expected to present a professional appearance and to dress according to the requirements of their position.

Every employee is expected to practice daily hygiene and good grooming. Scents – whether artificial or natural – should not be distracting to other employees or our passengers.

Where required, employees must come to work in a clean, pressed uniform. Those who report for work inappropriately dressed will be sent home unpaid and directed to return to work in proper attire. For safety reasons, the following appearance standards also apply for all operators and safety sensitive positions:

- Leather, rubber soled shoes must be worn
- Long hair extending past the shoulders must be tied back
- Fingernails cannot exceed 1/2" past the tip of the fingers
- Dangling jewelry, including earrings, is not permitted

If the employee's shift needs to be covered by another employee, the employee may forfeit his/her entire days shift at the manager's or supervisor's discretion. If sent home, the employee will be issued an attendance occurrence noted as an absence.

Smoking

Smoking (both cigarette and e-cigarette) is expressly forbidden in or near Company vehicles at all times. This rule applies to everyone - employees, passengers, clients and the general public. It is also prohibited for any employee to smoke in any MV facility or garage. Employees wishing to smoke must do so on their own time and a minimum of 20 feet from a facility or bus.

Solicitation

MV prohibits:

- Solicitation and distribution of goods, services, or literature by non-employees on Company premises
- Solicitation by employees on Company premises when the person soliciting or the person being solicited is on working time (Working time is the time employees are expected to be working and does not include your scheduled meal or other authorized breaks.)
- Distribution of goods and/or literature by employees on Company premises in non-working areas during working time, as defined above
- Distribution of goods and/or literature by employees on Company premises in working areas

Note: A “working area” is an area, usually inside production areas or offices, where work is performed. It includes halls and aisles used in the course of employees’ work. It also may include outside areas like the yard. “Working area” generally does not include break rooms, cafeterias, employee parking lots and Company grounds or recreation areas.

Confidentiality of Information

MV treats employee information as confidential. MV will only release employee information upon 1) written authorization, 2) court order, 3) as necessary in accordance with business needs and to administer benefits, or 4) to meet other contractual or legal requirements.

Security Inspections

Employees should not have an expectation of privacy in Company equipment such as desks, lockers, and computers. Desks, lockers, computer and communications systems are the property of the Company and therefore can be inspected by any agent or representative of the Company at any time, either with or without prior notice. The Company has the right to inspect packages and persons on, entering and/or leaving Company property. Any employee who wishes to avoid inspection of any articles or materials should not bring such items onto the Company's premises.

Employee Personnel Files

MV Transportation retains the right not to provide an employee with any duplications or copies of any paperwork within his/her personnel file, unless otherwise provided by applicable law. Access to and documents from an employee’s personnel file will be provided to employees as required by applicable law. Employees who are interested in reviewing the contents of their personnel file should complete the Personnel File Review Form and submit it to their Manager of Human Resources to schedule a mutually convenient time for an appointment.

To ensure that MV's personnel files are up-to-date and contain accurate, complete information, employees are asked to notify their supervisor or Human Resources of any changes that need to be made in any of the following categories:

- Name
- Telephone number
- Home address
- Individual to notify in case of an emergency

Safety and Incident Policies

Safety Hotline

Since the safety, health and welfare of our employees, passengers and public is our number one priority at MV, we have established an Employee Safety Hotline to report any safety problems or concerns. Our safety hotline number is **1 - 877 – MVSAFE - T (687-2338)**. Concerns including vehicle maintenance issues, unreported incidents, failure to secure wheelchairs, office safety issues, etc. should be reported to the Employee Safety Hotline. You are also expected to report any instances to your supervisor so your concerns can be immediately addressed.

Incident

Any occurrence, event or action (regardless of how minor) which does not follow Company procedures or presents a threat or problem to MV, its passengers, public or its employees is considered an incident. Any occurrence involving a passenger while under the care, custody and control of MV and its employees is considered an incident. Any contact between your vehicle and another person, vehicle or object is considered an incident whether or not there was damage or injury.

Incident Reporting

All incidents, regardless of how minor, must be immediately reported per MV's 'Incident Reporting' procedure. Failure to timely report any incident, regardless of whether or not it results in injury or property damage, may result in disciplinary action up to and including termination. **For workplace injuries, please refer to our 'Workers' Compensation' policy.**

Major Safety Incidents

For incident reporting purposes, a major incident is one involving a transit vehicle or occurring on MV property. This includes, but is not limited to:

- Fatality
- Pedestrian or cyclist incident/injury
- Passenger incident or injury involving a lift
- Passenger incident or injury while entering or exiting a vehicle
- Passenger incident or injury involving improperly securing a passenger
- Preventable roll-away incident
- MV Operator is cited for a major/serious moving violation (reckless driving, DUI)
- Any injury (including to the MV Operator) requiring immediate medical attention away from the scene
- Property damage of at least \$5,000
- Environmental spills
- Vehicle roll-over/lay-over
- Vehicle fire
- Incidents with Operator allegation of equipment or maintenance failure
- Events with potential for negative public relations and/or news media coverage
- Incidents where Operator drug and/or alcohol use may be involved
- Incidents where fault is in question
- Any use of a cellular telephone or electronic device while operating a company vehicle

Minor Safety Incidents

All other incidents that do not meet the definition of a “major” incident.

Subrogation of Incident or Injury Claims

Every employee is expected to protect MV's rights to subrogate for reimbursement of vehicle damages, Workers' Compensation payments and related costs, Medical and Dental Insurance payments and related costs, and other payments/costs which result from the negligence of third-parties. Employees must obtain concurrence from MV (Risk Management for Workers' Compensation claims or Human Resources for Medical/Dental claims) prior to signing any "release of liability" from any responsible third-party or third-party insurer.

Safety Investigation Leave

Any employee involved in a major incident will be placed on administrative leave while the incident is being investigated to determine root causes and preventability. Administrative leave is unpaid unless the incident is determined to be non-preventable. Employees may perform other non-safety sensitive functions if available and/or appropriate until final determination is made.

Electronic Systems

The company employs numerous technologies, including DriveCam, video systems, GPS and mobile data terminals in order to help ensure the safety of the driver and passengers, compliance with Federal, State and Local driving laws as well as regulations for both the driver and the motoring or pedestrian public. Any recording resulting from these technologies may be used as evidence in the investigation and may result in the issuing of appropriate disciplinary action.

Safety Point System

MV safety results are directly related to the actions and behaviors of our employees. At-risk behaviors lead to incidents and injuries. Therefore all MV safety sensitive employees are subject to a Safety Point Program rating which assesses cumulative points for at risk safety behaviors or actions.

Any work related incident, which involves an employee at MV will be investigated and may result in Safety Points being assigned.

If the incident is determined to have been "preventable" by the MV employee, then it will be considered a preventable incident. While an incident may not be legally considered your "fault", it will be treated as preventable, regardless of the cost to MV. Even minor damage incidents cost the Company money in terms of repairs, lost vehicle or driver time, staff time, etc. Any damage to a Company vehicle will automatically be assessed to the most recent employee who drove that vehicle and who failed to report it on a daily vehicle inspection sheet.

Preventability of Incidents and Injuries

The determination as to whether an incident could have been "preventable" will be made by the Division Safety Manager and General Manager. It is subject to review by the Area Safety Director and/or the Region Vice President. If there is a disagreement it will be given to the Vice President of Safety. The Chief Safety Officer has the final determination of preventability on all incidents.

Disciplinary Action

Any employee who has a preventable incident will be subject to re-training and/or discipline up to and including termination based on the safety point system.

Although most situations will be addressed by issuing safety points, MV reserves the right to impose discipline, up to and including termination, for any unsafe act, failure to follow safe work practices and/or procedures, or negligent operation of a Company vehicle regardless of the point assessment under the Safety Point System. Unsafe behaviors are also subject to disciplinary action regardless of whether they lead to injury. Such discipline must be approved by the Chief Safety Officer or a Company President.

Accruing Safety Points

DriveCam and Other Video Systems events/incidents will be assessed safety points based on the current version of the DriveCam and Other Video Systems Points Policy. DriveCam and Other Video Systems Points may result from both coached and auto-resolved events/incidents. DriveCam and Other Video Systems Points are included and considered when applying the following Maximum Allowable Safety Points section. The good-faith filing of a workers' compensation claim shall not accrue safety points or discipline

All preventable incidents will be assigned points in the following manner:

Failure to cycle wheelchair lift	One (1) point
Failure to do a proper vehicle inspection (DVI)	One (1) point
Driver unbelted or improperly belted when legally required	One (1) point
Failure to stop at a Railroad Crossing.....	One (1) point
Unsafe maneuver(s) or act(s)	Two (2) points
Conviction of a minor traffic violation	Two (2) points
Backing incident or collision.....	Three (3) points
Rear-end collision	Three (3) points
Failure to provide door-to-door service, to include failure to properly load/unload a passenger via the lift.....	Three (3) points

Preventable incident and/or collision up to \$15,000 in injuries or property damage	Four (4) points
Preventable incident or collision up to \$20,000 in injuries and/or property damage	Five (5) points
Preventable incident or collision in excess of \$20,000 in injuries and/or property damage	Six (6) points
Any preventable roll-away incident or collision regardless of damage amount	Six (6) points
Failure to properly secure/transport a mobility device	Six (6) points
Failure to properly secure/transport a paratransit passenger	Six (6) points
Failure to immediately report a citation or incident in a Vehicle while in Company service	Six (6) points
Tampering with, disabling, obstructing, abusing, disconnecting, or otherwise interfering with Drive Cam or other monitoring equipment	Six (6) points
Any use of a cellular telephone or electronic device while operating a vehicle in Company Service	Six (6) points
Conviction of a major traffic violation *	Six (6) points

() A major traffic violation is any citation, in either a personal or company vehicle, that involves any item listed under Major Safety Incidents and/or: (1) Driving while intoxicated or under the influence of alcohol or drugs; (2) Failure to stop and immediately report an incident in which you are involved; (3) Homicide, manslaughter, or assault arising out of the operation of a motor vehicle; (4) Driving while your license is suspended or revoked; (5) Reckless driving; (6) Possession of open container or alcoholic beverages; and/or (7) Speed contests, drag racing, or attempts to flee from an officer of the law, (8) leaving the scene of an accident.*

To be clear, and notwithstanding any other language in the Safety and Incidents Policy, an employee will not receive safety points or be otherwise disciplined simply because an incident results in an injury or a worker’s compensation claim.

Maximum Allowable Safety Points

For introductory employees:

The occurrence of a preventable incident during the introductory period will result in termination. Receipt of four (4) or more points during the introductory period, outside of preventable incidents, will result in termination. In addition, receipt of two (2) separate safety point assessments during the introductory period will result in termination, regardless of the employee’s total point count.

For non-introductory period employees:

In any rolling 18 month period of employment, receipt of six (6) or more points will result in termination. Any infraction which occurred more than eighteen months prior would no longer be included in the safety point count. In addition, receipt of three (3) separate safety point assessments in any rolling one year period will result in termination, regardless of the employee's total point count.

Safety Point Hearing

If an employee feels that he/she has been issued safety points improperly, a point count hearing may be requested. Point count hearing requests must be made within five (5) business days of the point assessment to your supervisor. The supervisor will contact the Area Safety Director to conduct the hearing within ten (10) business days of the request.

The hearing panel will consist of three of the following people: Vice President of Safety, Area Safety Director, General Manager, Assistant General Manager and/or Safety and Training Manager. The hearing will be chaired by the Vice President of Safety or the Area Safety Director. Decisions by the panel must be signed-off and approved by the Regional Vice President and the Chief Safety Officer to be binding.

Retraining

MV reserves the right to require an employee to attend retraining in addition to any discipline imposed. Failure to attend mandated re-training courses may result in disciplinary action up to and including termination.

All customer service related incidents which do not result in termination are subject to retraining from the MV customer service program (Ergometrics START program) or other approved Customer Service Training Module using the applicable section of the training that will apply to the incident. This must be accomplished within one week of the incident date.

All vehicle-related incidents which do not result in termination are subject to retraining using the approved Defensive Driving Training Programs. This must be accomplished within one week of the incident date.

Retraining may also be required based on an unacceptable onboard or field inspection.

MVR Records

All employees in safety sensitive positions who will operate a vehicle in Company service (either on a regular or occasional basis) must provide a copy of their Motor Vehicle Record (MVR). MVR's may also be checked during employment. Such employees must report to their supervisor a citation received in either a vehicle in Company service or personal vehicle within 24 hours. Failure to report a citation will result in immediate termination.

MV retains the right to access your MVR during employment. If an operations employee in a position requiring a driver's license has his/her license suspended, restricted or revoked, as a result of a vehicle citation, his/her employment may be terminated at the sole discretion of the company.

Statements at the Scene of an Incident

Under no circumstances is a MV Operator to discuss the circumstances of a vehicular incident occurring while in the course of his/her duties for MV or make any statement about the incident with anyone other than with police, MV division/safety personnel, MV Risk Management personnel, MV attorneys, and/or MV Third Party Claims Administrator personnel. Drivers are to give their names, addresses, telephone numbers, vehicle insurance, and driver's license information. Any further information can be obtained by contacting the General Manager or the Area Safety Director.

Leaving the Scene of an Incident or Injury

Under no circumstances is a MV Operator to leave the scene of an incident without first doing each of the following:

1. Immediately reporting the incident to the division.
2. Providing any and all claimants or other parties in the incident the personal and Company information required by law and needed to make a claim.
3. Obtaining all information regarding other vehicles and parties involved.
4. Obtaining authorization from the dispatcher to leave the incident scene.
5. Taking pictures of the vehicles involved and the incident scene as well as sketching out the scene of the incident on the incident diagram form.

Safety Inspections

All employees are subject to inspections to ensure safe, quality service for our passengers. Inspections will be done at random as well as scheduled times. Types of inspections include field inspections, on-board evaluations, vehicle inspection audits and facility inspections.

Wheelchair Lift Deployment

Under no circumstances is a MV employee to leave a wheelchair lift partially or completely in the down position outside of the vehicle while not physically there and able to alert any pedestrians to the potential danger. Under no circumstances is the vehicle to be driven unless the wheelchair lift is safely and properly stowed in its secure folded position.

Safety Meetings

Safety meetings are a critical component of our safety program and assist MV in managing contractual and refresher training requirements. All operations employees are required to attend a minimum of one safety meeting per month.

Return of Property

Employees must return all Company property at the time of termination, resignation or layoff, or immediately upon request. Where permitted by law, the Company may withhold from the employee's pay or final pay the cost of any items that are not returned. The Company may also take all action deemed appropriate to recover or protect its property.

Use of Personal Cell Phones and other Electronic Devices

The use of cell phones for personal calls during your working hours is discouraged and should be limited to break or meal periods. Where a client contract prohibits drivers from carrying personal cell phones, the use of personal cells phones is prohibited. Any use of a personal cell phone or other non company-issued electronic device, hands-free or not, during the operation of a company vehicle is prohibited.

Preparedness for Work and Alertness Management

It is the Operator's responsibility to report for duty well rested, with proper equipment and uniform and in sufficient time as required to perform his/her duties.

Professional operators must get adequate rest – ideally a minimum of eight hours – before coming to work. Every operator is responsible for coming to work well rested, as there is a significant risk of fatigue-related incidents. If an operator is not properly rested or is fatigued, they must report their condition to a supervisor or manager immediately.

APPENDIX 1

Federal and State Agencies

Local, state and federal employment discrimination agencies that enforce the laws against sexual harassment and discrimination in California, Maine, Massachusetts, Rhode Island, and Vermont and for government contractors can be contacted at the phone numbers and addresses listed below.

Federal

The Office of Federal Contract Compliance Programs (OFCCP)

U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210
Phone (800) 397-6251
TTY (202) 6936-1337
OFCCP-Public@dol.gov

California

Department of Fair Employment and Housing

Sacramento District Office
2000 O Street, Suite 120
Sacramento, CA 95814
Phone (800) 884-1684
Fax (916) 323-6092

Equal Employment Opportunity Commission

901 Market Street, Suite 500
San Francisco, CA 94103
Phone (415) 356-5100

Maine

Main Human Rights Commission

51 State House Station
Augusta, ME 04333
Phone (207) 624-6050
Fax (207) 624-6063
TTY/TTD (888) 577-6690

Equal Employment Opportunity Commission, Area Office

John F. Kennedy Federal Building
Government Center, Room 475
Boston, MA 02203
Phone (617) 565-3200

Massachusetts

Massachusetts Commission Against Discrimination

1 Ashburton Place, Room 601

Boston, MA 02108

Phone (617) 994-6000

436 Dwight Street

Springfield, MA 01103

Phone (413) 739-2145

Equal Employment Opportunity Commission, Area Office

John F. Kennedy Federal Building

Government Center, Room 475

Boston, MA 02203

Phone (617) 565-3200

Rhode Island

Rhode Island Commission for Human Rights

180 Westminster Street

Providence, RI 02903

Phone (401) 222-2661

Equal Employment Opportunity Commission, Area Office

John F. Kennedy Federal Building

Government Center, Room 475

Boston, MA 02203

Phone (617) 565-3200

Vermont

Vermont Attorney General's Office

Civil Rights Unit

109 State Street

Montpelier, VT 05602

Phone (802) 828-3171

Equal Employment Opportunity Commission, Area Office

John F. Kennedy Federal Building

Government Center, Room 475

Boston, MA 02203

Phone (617) 565-3200

APPENDIX 2

EMPLOYEE RIGHTS AND RESPONSIBILITIES

UNDER THE FAMILY AND MEDICAL LEAVE ACT

Basic Leave Entitlement

FMLA requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to eligible employees for the following reasons:

- For incapacity due to pregnancy, prenatal medical care or child birth;
- To care for the employee's child after birth, or placement for adoption or foster care;
- To care for the employee's spouse, son or daughter, or parent, who has a serious health condition; or
- For a serious health condition that makes the employee unable to perform the employee's job.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered servicemember during a single 12-month period. A covered servicemember is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the servicemember medically unfit to perform his or her duties for which the servicemember is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list.

Benefits and Protections

During FMLA leave, the employer must maintain the employee's health coverage under any "group health plan" on the same terms as if the employee had continued to work. Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of an employee's leave.

Eligibility Requirements

Employees are eligible if they have worked for a covered employer for at least one year, for 1,250 hours over the previous 12 months, and if at least 50 employees are employed by the employer within 75 miles.

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Use of Leave

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

Substitution of Paid Leave for Unpaid Leave

Employees may choose or employers may require use of accrued paid leave while taking FMLA leave. In order to use paid leave for FMLA leave, employees must comply with the employer's normal paid leave policies.

Employee Responsibilities

Employees must provide 30 days advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days notice is not possible, the employee must provide notice as soon as practicable and generally must comply with an employer's normal call-in procedures.

Employees must provide sufficient information for the employer to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform the employer if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees also may be required to provide a certification and periodic recertification supporting the need for leave.

Employer Responsibilities

Covered employers must inform employees requesting leave whether they are eligible under FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the employer must provide a reason for the ineligibility.

Covered employers must inform employees if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the employer determines that the leave is not FMLA-protected, the employer must notify the employee.

Unlawful Acts by Employers

FMLA makes it unlawful for any employer to:

- Interfere with, restrain, or deny the exercise of any right provided under FMLA;
- Discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Enforcement

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement which provides greater family or medical leave rights.

FMLA section 109 (29 U.S.C. § 2619) requires FMLA covered employers to post the text of this notice. Regulations 29 C.F.R. § 825.300(a) may require additional disclosure



For additional information:
1-866-4US-WAGE (1-866-487-9243) TTY: 1-877-889-5627
WWW.WAGEHOUR.DOL.GOV



RECEIPT AND ACKNOWLEDGEMENT

EMPLOYEE HANDBOOK ACKNOWLEDGEMENT FORM

I have received a copy of the September 2016 MV Employee Handbook, and I have reviewed and understand its provisions. If at any time I do not understand a policy in this Handbook or any other Company policy, I will seek clarification from my supervisor or the Human Resources Department. Unless otherwise provided under the terms of an applicable Collective Bargaining Agreement or other valid contract, I understand the Company is an 'at will' employer and, as such, employment with the company is not for a fixed term or definite period and may be terminated at the will of either party, with or without cause and without prior notice.

I understand that the Handbook states certain of the Company's policies and practices in effect on the date of publication. I UNDERSTAND THIS HANDBOOK DOES NOT CONSTITUTE A CONTRACT OF EMPLOYMENT. I UNDERSTAND THAT NOTHING CONTAINED IN THIS HANDBOOK MAY BE CONSTRUED AS CREATING A PROMISE OF FUTURE BENEFITS OR A BINDING CONTRACT WITH THE COMPANY FOR BENEFITS OR FOR ANY OTHER PURPOSE. Unless otherwise provided under the terms of an applicable Collective Bargaining Agreement, arbitration agreement, or other valid contract, I also understand that the Company's policies and procedures may be amended, supplemented, modified or terminated at any time, with or without notice.

Employee Signature

Date

Employee Name (please print)



Injury and Illness Prevention Program

MV TRANSPORTATION INC.
735 Public Safety Way
Corona, Ca 92880

Division 581 Corona

Catherine Wynne 7/21/2021
Catherine Wynne

Policy Statement Foreword

The management of MV Transportation, Inc. recognizes that the health and safety of our employees is of paramount importance to the successful operation of our business. Employees have a right to expect a safe and healthy working environment and safe job methods and practices. For that reason, MV holds safety and health as our highest value.

MV managers and supervisors are responsible for maintaining healthy and safe working conditions and for the implementation of MV's Injury and Illness Prevention Program (IIPP) in their respective departments.

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 will be made to provide adequate training to MV 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.

MV 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.

Note: The references herein to "MV" or "MV Transportation" describe MV Transportation, Inc., to include all its subsidiaries, joint ventures, partnerships, and affiliates.

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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, MV hopes to develop and maintain employee awareness, health, and safety.

Program Objectives:

- To provide employees with a safe environment in which to work 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 method 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 MV 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 ultimate 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. MV 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. MV employees **will not** be disciplined or suffer any retaliation for reporting, in good faith, a safety violation or potential hazard.

2. Safety Roles and Responsibilities

2.1. Safety Director

Under the authority of MV's Board of Directors and the chief operating officer (COO), 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 or General Manager has the authority and responsibility to develop and implement the IIPP at his/her division.

2.3. Supervisory/Lead Personnel

Each Supervisor is responsible for implementing the IIPP in his/her 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 will result in disciplinary action and may be grounds for dismissal.

3. Participation and Compliance

3.1. Employee Agreement to Participate

A safe and healthy workplace is among MV's highest priorities. All personnel are expected to use safe work practices at all times. While MV cannot anticipate every workplace hazard, the following general principals should serve as a guide for MV 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 MV, 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 will be 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 MV personnel.

To ensure compliance, MV shall:

- Conduct safety orientations for new employees.
- Recognize employees that perform above and beyond MV safety policies.
- Promptly distribution or post updates and notices, via written or electronic means (e.g. bulletin boards, newsletter, etc.).
- Conduct periodic safety meetings (once a month)
- Provide formal and informal training.
- Encourage employee reporting of unsafe conditions.
- 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, will be subject to disciplinary action, up to and including termination.

4. Safety Training and Communication

4.1. Overview

In order to maintain a safe and healthy work environment as well as complying with local, state, and federal safety codes, MV 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 with safety and health hazards to which 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 will be 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 MV policies and procedures.
- A new hazard has been discovered.
- 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 MV 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 his/her designee shall conduct monthly safety meetings on topics of interest which are relevant to their employee's work activities. Employees will be given an opportunity to ask questions and to raise any safety concerns. These meeting will 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

MV 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.
- Hazard identification and abatement.

4.4. Workplace Inspections

Supervisors will review work operations daily for compliance with safe work practices and standard operating procedures. At least monthly, each supervisor or his/her designee will conduct more in-depth inspections to identify workplace hazards and unsafe conditions or work practices.

Additional inspections will take place when:

- The IIPP is initially established.

- When occupational injuries or illness has occurred.
- Workplace conditions warrant an inspection.
- Whenever a supervisor is made aware of a new or previously unrecognized hazard.

A record of the inspection and discrepancies found shall be maintained by the safety manager and a follow-up action plan shall be established to ensure that corrective measures are taken. The safety manager will also conduct periodic walkthroughs at his/her 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 his/her designee will take appropriate corrective measures in a timely manner based upon the severity of the hazard. Inspection findings will be prepared in writing and maintained by the Safety Manager.

Employees will be informed of the hazard and interim protective measures taken until the hazard is corrected. If the hazard cannot be immediately abated, all personnel shall be removed from the affected area. Access to the area will be controlled until the safety of personnel can be assured.

5. Incident Investigation

5.1. Incident Investigation

The first response, by a supervisor to an incident, is to begin an incident investigation immediately and submit a preliminary report to the general manager within 24 hours. The focus must be to place priority on learning as much as possible about what happened and to identify means to prevent similar occurrences in the future.

The incident investigation shall detail such things as:

- 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 and the safety 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.
- 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 possible (when it is safe to do so) to obtain important details from witnesses while those details 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 the regional vice president within 8 hours. 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.

6. Record Keeping

6.1. Scheduled Inspections

The Safety Manager will maintain records of formal inspections for at least three years. These records will include at least 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 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. This documentation will be 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:

- Employers 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 5 years.

7. COVID-19 Health and Safety Preparedness Plan

MV Transportation is committed to providing a safe and healthy workplace for all employees, customers, clients, and business partners. To ensure we have a safe and healthy workplace, MV Transportation has developed the following COVID-19 Health and Safety Preparedness Plan in response to the COVID-19 pandemic. All employees are responsible for implementing this plan. Our goal is to mitigate the potential for transmission of COVID-19 in our workplaces and communities, and that requires full cooperation among our workforce. Only through this cooperative effort can we establish and maintain the safety and health of all persons in our workplaces.

MV's COVID-19 Health and Safety Preparedness Plan follows the guidance published by the Centers for Disease Control and Prevention (CDC), Occupational Safety and Health Administration (OSHA), as well as industry guidance applicable to our business from the Federal Transit Administration (FTA) and American Public Transportation Association (APTA). This plan addresses:

- Everyday preventative safety precautions;
- Ensuring sick employees stay home and prompt identification and isolation of sick persons;
- Physical distancing – Employees must be at least six-feet apart;
- Worker hygiene and source controls;
- Workplace cleaning and disinfection protocol; and
- Communications and training practices and protocol.

This plan provides guidance for personal hygiene skills and habits that should be followed at home and in the workplace. Remember, safety is everyone's job!

7.1. Maintain Safe Behavioral Practices

It is imperative that we all take self-responsibility during this pandemic. Everyone has a role in making sure our communities are as safe as possible – at work and at home.

1. Stay home if you are sick. Inform your supervisor if you have a sick family member at home with COVID-19.
2. Practice [6 feet](#) physical distancing in every situation possible.
3. Avoid social gatherings outside of work where more than 10 people are gathered, including postponing travel plans.
4. Facial coverings or face masks are required. [Follow protocols on proper way to wear and dispose of masks.](#)
 - a. Facial coverings and masks should properly [cover your nose and mouth.](#)
 - b. Stay informed from the CDC on the [importance of your facial coverings](#) and masks.
5. When possible, use phone, email or Microsoft Teams instead of face-to-face interactions.
6. Do not shake hands – consider the use of other noncontact methods of greeting.
7. [Regularly wash your hands](#) with soap and water for 20 seconds or apply hand sanitizer containing at least 60% alcohol immediately after coming into contact with another person.
8. If wearing gloves, wash your hands immediately after taking them off. [Follow protocols on proper way to wear and dispose of gloves.](#)
9. Avoid touching your nose, mouth and eyes.
 - Cover coughs and sneezes with a tissue or elbow, and immediately wash hands or apply hand sanitizer.
 - Cough etiquette is a series of actions to take if you are coughing or sneezing, which are designed to reduce the spread of respiratory illness to others.
 - Sneeze blow your nose, or cough into a disposable tissue, and discard the tissue immediately into a bin.
 - Practice routine cleaning and disinfection of frequently touched surfaces, following the directions on the cleaning product's label.
 - Limit the use of shared tools and schedule regular decontamination should sharing occur (i.e. tools in the shop, pens at check-in, etc.).
 - Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
 - Report any safety concerns or hazards to your supervisor or manager.

Please review the following sections for a more in-depth overview of precautions to take to maintain a safe and healthy workplace.

7.2. Sanitary Measures in the Workplace

Performing Cleaning and Disinfection

The virus that causes COVID-19 can be killed if you use the right products. EPA has compiled a list of disinfectant products that can be used against COVID-19, including ready-to-use sprays, concentrates, and wipes. Each product has been shown to be effective against viruses that are harder to kill than viruses like the one that causes COVID-19.

MV Transportation has procured [Zep Spirit II, Triton, Lemonex III, and D-7 for cleaning and disinfecting](#). These are an EPA approved product against COVID-19. The current cleaning protocols have been enhanced to include deep cleaning on a more regular basis using the EPA approved products.

Additionally, Lysol Disinfecting Wipes are included as an effective disinfecting measure in between the deeper cleans.

According to the CDC, "Cleaning refers to the removal of germs, dirt, and impurities from surfaces. It does not kill germs, but by removing them, it lowers their numbers and the risk of spreading infection. Disinfecting refers to using chemicals, for example, EPA-registered disinfectants, to kill germs on surfaces. This process does not necessarily clean dirty surfaces or remove germs, but by killing germs on a surface after cleaning, it can further lower the risk of spreading infection. If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection."

- Consider the type of surface; is it a hard surface or a soft surface? Ensure the product instructions are followed and all surfaces are receiving cleaning / disinfecting. Prioritize disinfecting frequently touched surfaces.
- Wear disposable gloves to clean and disinfect. Additional PPE may be needed based on setting and product. Please read the product instructions and/or Safety Data Sheet (SDS) prior to using.
- First, perform routine cleaning with soap and water to remove germs and dirt from surfaces.
- If surfaces are visibly dirty, they should be cleaned using a detergent or soap and water prior to disinfection.

- Then, disinfect using an EPA-approved disinfectant. Disinfectants will kill germs on surfaces.
- Contact time with the surface or object should not be brief. Follow the instructions on the label, which will recommend keeping surface wet for a period of time to ensure sufficient time to kill the virus (i.e. at least 30 seconds prior to wiping dry).
- Frequently touched surfaces in the workplace will be disinfected using an EPA-approved product against COVID-19.
- When possible, avoid using other workers' phones, desks, offices, or other work tools and equipment. If necessary, clean and disinfect them before and after use.
- Store and use disinfectants in a responsible and appropriate manner according to the label. Do not mix bleach or other cleaning and disinfection products together.
- Gloves and other disposable PPE used during cleaning and disinfecting should be removed and thrown away.
- After removing gloves, wash hands with soap and water for at least 20 seconds, or use a hand sanitizer with at least 60% alcohol if soap and water are unavailable.

The CDC guidelines on cleaning and disinfecting are summarized above. More in-depth detail can be found on their website: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

All locations will receive the enhanced cleaning protocol and will ensure accountability by recording cleaning on a schedule and log. Additionally, all employees should clean their area routinely throughout their shift, using sanitizing wipes.

Finally, MV Transportation has developed a set of protocols to decontaminate the workplace if an employee becomes ill with COVID-19, consistent with the CDC standards.

Using Sanitizing Wipes

Wipes will allow you to keep your workspaces clean in-between deeper cleanings.

- Read and follow the instructions on the label.
- Keep the following tips in mind:
- Do not reuse wipes to wipe down multiple surfaces. This can transfer germs from the used wipe to other surfaces. To prevent this, use one wipe for each surface and then throw it out.
- These wipes should not, under any circumstances, be thought of as a substitute for other hygienic practices like proper hand-washing.
- Sanitize your hands after wiping down a surface.
- Store sanitizing wipes at room temperature and securely close covers so they do not dry out.

Frequently Touched Surfaces

There are several high-touch areas in the facility or office that need to be frequently wiped down and cleaned.

Prioritize disinfecting these frequently touched surfaces. Examples of frequently touched surfaces and objects that will need routine disinfection include, but are not limited to:

Tables	Countertops	Phones	Faucets and Sinks
Doorknobs	Handles / Handrails	Keyboards	Electronics
Light switches	Desks	Restroom Surfaces	Elevator Buttons
Steering wheels			

- Before and after a staff member changes shifts, wipe down the entire workstation, including the PC, keyboard, phone, desk, etc.
- Any shared tool or object should be wiped down before and after using it.
- Operators are encouraged to avoid touching surfaces often touched by passengers, but to disinfect before and after when needed, and then sanitize their hands.
- Operators will have access to disposable sanitizing wipes to use on any surface with which they have regular contact. Surfaces should be wiped regularly, after each stop if possible.
- Clean your frequently touched surfaces routinely throughout your day.

Everyone needs to take personal responsibility for helping disinfect and clean their work areas throughout the day.

Clean Desk Policy

In an effort to maintain optimal workplace cleanliness, all employees are to follow a clean desk policy.

- To avoid cross contamination, please limit the amount of personal items brought into the workplace to the essential items needed to be productive for the workday. No bringing in pastries or other community food items.
- Limit the outside items brought into the workplace.
- Upon entering the workplace, disinfect your surface area and frequently touched objects.
- Plan first thing in the morning and keep just the things you need for your workday on your desk.

- Maintain a supply of PPE at your desk for personal use, including tissues, hand sanitizer, sanitizing wipes, and a facial covering.
- All sensitive and confidential paperwork must be removed from the desk and locked in a drawer or filing cabinet.
- Pick up at the end of the day and disinfect your workspace at the end of your shift.

7.3. Hygiene and Infection Control

Feeling Sick or Symptomatic

Employees are to be informed of and encouraged to self-monitor for signs and symptoms of COVID-19. Employees who feel ill or are exhibiting symptoms of COVID-19 should not report to work. Symptoms of COVID-19 can be found on CDC at

<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

If an employee begins feeling ill while in the workplace, they are to isolate from others, send a notification to their supervisor, and immediately leave the workplace. The employee is encouraged to immediately seek medical care. The employee will be contacted by their supervisor with further instructions.

MV Transportation has developed a set of protocols that includes contact tracing guidelines to communicate with others that may have been potentially exposed if they were in close contact with the sick employee, according to CDC guidelines.

If any employee has tested positive for COVID-19 or been diagnosed as COVID-19 positive by a healthcare provider within the last 14 days, they will not be permitted to enter the workplace and will be asked to isolate at home.

If an employee has been in close contact with anyone who has been diagnosed as infected with, or is being screened or monitored for, COVID-19, or who has been advised by a health care professional to quarantine within the last 14 days, they will not be permitted to enter the workplace and will be asked to self-quarantine.

MV Transportation will maintain confidentiality of screening information, which are designed only for COVID-19 related purposes while it remains a direct threat and/or we continue to be in a state of emergency. This is in an effort to maintain a safe environment as we focus on the health and well-being of our employees and the community.

Hand Hygiene

Proper hand hygiene is an important infection control measure. MV Transportation will ensure that handwashing and/or hand sanitizing stations are readily available and stocked.

Employees are to wash hands regularly with soap and water for at least 20 seconds. If soap and water are not readily available, use an alcohol-based hand sanitizer containing at least 60% alcohol.

Wash hands with soap and water or use hand sanitizer before and after wearing gloves. And whether you wear gloves or not, avoid touching your eyes, nose and mouth to limit possible exposure to germs.

Employees are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, but especially at the beginning and end of their shift, prior to any mealtimes, and after using the restroom. All employees and non-employees are required to wash or sanitize their hands prior to or immediately upon entering the workplace.

Key times to clean / disinfect hands in general include:

- Before, during, and after preparing food
- Before eating food
- After using the toilet
- After blowing your nose, coughing, or sneezing

Additional times to clean / disinfect hands on the job include:

- Before and after work shifts
- Before and after work breaks
- After touching frequently touched surfaces
- Before and after wearing gloves
- Before and after providing care for another person who needs assistance
- After putting on, touching, or removing cloth face coverings
- Avoid touching your eyes, nose, or mouth.

Practice good personal health hygiene, including washing your clothes and your safety vest. Signs and posters are posted in the following areas to reinforce these safety precautions:

- At the office entrance
- In the bathrooms
- Near sinks or faucets
- In the breakrooms

Hand Sanitizer

There are important differences between washing hands with soap and water and using hand sanitizer. Soap and water work to remove all types of germs from hands, while sanitizer acts by killing certain germs on the skin.

- DO NOT use hand sanitizer if your hands are visibly dirty or greasy. If a handwashing station is available, wash your hands with soap and water instead.
- When using hand sanitizer, use an alcohol-based hand sanitizer that contains at least 60% alcohol.
- Put enough sanitizer on your hands to cover all surfaces.
- Rub your hands together until they feel dry (this should take around 20 seconds).
- Do NOT rinse or wipe off the hand sanitizer before it's dry; it may not work well against germs.

“Electronic Hygiene”

For electronics such as cell phones, tablets, MDTs, touch screens, remote controls, and keyboards, employees are to practice safety precautions and to wipe these down frequently to disinfect and sanitize.

Instructions:

- Follow the manufacturer’s instructions for all cleaning and disinfection products.
- If no manufacturer guidance is available, consider the use of alcohol-based wipes or sprays containing at least 70% alcohol to disinfect touch screens.
- Wipe the surfaces prior to use and when you are done using them at the end of the shift.
- Wipe the surfaces down after anyone else touches them.
- Dry the surfaces thoroughly to avoid pooling of liquids.
- Clean your hands as frequently as possible and sanitize your hands before and after touching new surfaces.
- If you have a timeclock, please reference the Coronavirus Response website for guideline on cleaning your [timeclocks](#).

This includes the following:

- Your PC or laptop
- Your phone
- The printer
- Any other electronics

7.4. Use and Availability of PPE

Availability of PPE in the Workplace

MV Transportation will provide employees the recommended protective supplies and ensure the availability of hand sanitizer and approved cleaning products.

- Face masks, gloves, hand sanitizer, and sanitizing wipes will be available to employees and are to be used during employee shift

- Hand Sanitizer is strategically placed throughout facility and “Sanitary Stations” are available at high-touch areas
- Routine cleaning of frequently touched surfaces is to be practiced by all employees. If an employee is running low on PPE, they are to contact their supervisor.

Proper Use and Disposal of Gloves and Masks

If you are using gloves and masks for additional protection, please be sure to follow the proper usage and disposal of gloves and masks. Employees are to follow universal precautions, like what is taught through Bloodborne Pathogen training.

Gloves

- Wash and/or sanitize hands before and after using gloves
- Ensure glove removal does not cause additional contamination of hands.
- Gloves can be removed using more than one technique (i.e. glove-in-glove or bird beak).
- Change gloves throughout the day to avoid cross-contamination.
- After removing PPE, wash your hands with soap and water for at least 20 seconds or use hand-sanitizer (with at least 60% alcohol).

Masks

- Facial coverings are to be worn in all areas of the business.
- Wash and/or sanitize hands before and after using a facial covering.
- Do not touch the front of the respirator, facemask or facial covering.

Facial coverings should cover your nose and mouth and be snug against your face.

- Carefully untie (or unhook from the ears) and pull away from face without touching the front.
- For disposable masks, dispose of it in a safe and secure manner.
- Cloth masks and gloves should be washed and dried as frequently as possible, with detergent and the warmest water possible, in accordance with CDC guidelines for cleaning and disinfecting soft (porous) surfaces.
- After removing PPE, wash your hands with soap and water for at least 20 seconds or use hand-sanitizer (with at least 60% alcohol).

Work uniforms worn during cleaning and disinfecting should be laundered afterwards. Clean your hands after handling laundry by washing your hands with soap and water or using an alcohol-based hand sanitizer with at least 60% alcohol if soap and water are not available.

Reference the [Coronavirus Response website](#) for more in-depth safety procedures for both [gloves](#) and [masks](#).

7.5 Physical Considerations and Office Layout

Physical distancing of at least six feet is to now be implemented and maintained throughout the workplace through both engineering and administrative controls. Per CDC recommendations, no congregating should occur. Therefore, there are practices that MV Transportation has adopted to promote a safe physical environment for employees.

The following actions have been implemented:

- Workspace seating adheres to 6 feet separation, including spacing out staff members into every other cubicle and installing barriers or partitions where possible or necessary
- Workspaces have been reconfigured that takes physical distancing into account, including all common areas
- Visual cues and signage are placed throughout the workplace to encourage proper physical distancing
- Tape markings showing acceptable physical distancing placed where lines might form
- Traffic patterns have been evaluated for physical distancing bottlenecks
 - a. Entrance and exit doors identified
 - b. Directional signage “one-way” floor markings implemented where possible while maintaining compliance with safety code
 - c. Capacity limits established or rooms / spaces closed when necessary
 - d. Small conference rooms have been closed or a capacity limit has been established
 - e. Desks, tables, and chairs in congregation-prone areas have been removed (including in the breakroom)

Breakrooms / Lounges

As previously stated, we need to limit the use of shared objects and avoid congregating. This includes the breakroom.

- Employees are encouraged to bring their own lunchbox with an icepack.
- Seats and/or tables are removed in the breakroom to help avoid congregating and to provide additional personal space to achieve 6 feet distance.
- Employees are to stagger their meal and rest breaks to avoid congregating.
- Limit surface contact by removing or shutting down (where possible) the following:
 - Microwaves, Coffee Pots, Popcorn Machines, Water Cooler, Refrigerators, Ice Machines, Sinks

- Drinking fountains are closed until further notice; employees are encouraged to use bottle filling stations, sinks, or employees bringing water from home.
- A “sanitary station” is set up within the breakroom and employees are to clean / disinfect the frequently touched surfaces before and after use.
- Exceptions for the refrigerator use includes medical purposes and split shifts.
- No food is to be stored in the fridge overnight.
- Signage is posted on the refrigerator instructing on the sanitary protocol.
- If the breakroom needs to be accessed, capacity limits are established at no more than 1 or 2 people in breakroom at any given time (depending on square footage of space).

Restrooms

- Our workplaces follow our [Facility Cleaning policy](#) for thorough cleaning in areas where we perform the cleaning.
- Restrooms are receiving a more frequent cleaning protocol.
- Restrooms are checked regularly to ensure they are stocked with hand soap and paper towels.
- Capacity limits are established at no more than 1 or 2 people in restroom at any given time to allow for 6 feet physical distancing.
- A [hand hygiene awareness poster](#) is visible in the restrooms near the sinks.
- Employees are to wash their hands and re-sanitize prior to returning to their desk.

No Visitor Policy

Until further notice, employees are not to have visitors or business partners visit us at our workplace. The use of phone, email or Microsoft Teams should be leveraged instead of face-to-face interactions.

How can I achieve physical distancing in meetings, training, or conversations?

There are certain things that will still need to occur in our daily operations. To the extent possible, the use of phone, email or Microsoft Teams should be leveraged instead of face-to-face interactions.

However, these are ways to achieve Physical Distancing during a mandatory interaction:

- [Post a sign on the door](#) to ask employees to knock and wait for directions rather than just walking into the office
- Find a larger space where you can talk and keep distance.
- Everyone is to wear a facial covering and have recently washed their hands.

- Stagger seating in conference and training rooms to maintain a 6 feet distance.
- Have individual writing utensils rather than using shared items.

7.5. Culture of Mental Health Safety

While it is not the responsibility of an employer or supervisor to diagnose mental health conditions, MV Transportation is committed to promoting a culture of mental health safety as we continue to navigate through this pandemic. Leadership, supervisors and other managers have an essential role in promoting a culture of wellness.

Assess Internal Resources

MV Transportation is committed to communicate the “how” of navigating healthcare benefits and Employee Assistance Program (EAP) services – for employees in distress or employees who have not used these benefits before, not knowing how to navigate resources is a barrier to accessing them.

Employees are encouraged to take advantage of our EAP, LifeWorks. LifeWorks is a total well-being solution offering support for your mental, physical, social and financial well-being. The invitation code is MVT-Employee ID, for example MVT-222333.

Employees are encouraged to contact their Human Resources representative if they have any questions about this program.

Connecting Employees to Mental Health Resources

An educated workforce can better protect themselves from the impacts of mental health and stress related to COVID-19. MV Transportation is committed to providing resources from the National Safety Council that includes tips on managing stress and taking care of mental health during a pandemic.

Here are a few tips to help promote positive mental health:

- **Take care of your mental health and be aware of signs of stress.** Take deep breaths, stretch, or meditate. Try to eat healthy, well-balanced meals, exercise regularly and get plenty of
 - sleep. Even 1 minute of practicing mindfulness will help you calm your mind.
- **Utilize resources at your disposal.** Take advantage of the EAP, LifeWorks.
- **Be aware of signs of stress in your family members.** Not all children and teens respond to stress in the same way. Talk to your child to reassure them, try to keep up with regular routines, and be a role model to them. The CDC has put together [other recommendations to help children cope](#).

- **Kindness and patience go a long way.** We are all adjusting to this new normal and each person adjusts differently. Make time to talk and be supportive of your teammates, friends, and family current needs and concerns.

It is important to recognize how mental health can affect worker safety. Even if no actual illness is diagnosed, it's easy to imagine how a worker's mental state might affect his or her ability to make good decisions and recognize potential hazards.

7.6. 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: _____



MV Transportation, Inc.

EMPLOYEE ACCIDENT/INJURY REPORT
(COMPLETE ALL BLANKS)

Date of Accident/Injury: _____ / _____ / _____ Time of Accident/ Injury: _____ AM/PM

Name of Employee: _____

Home Address: _____ City: _____ State: _____ Zip: _____

Home Phone: _____ (____) _____ - _____

Date of Birth: _____ / _____ / _____ Date of Hire: _____ / _____ / _____ Sex: Male Female

Occupation/Position: _____

Accident/Injury Reported to: _____ Date Accident/Injury Reported: _____ / _____

Location name where incident occurred: _____

Address where incident occurred: _____

Describe how the incident happened (*how, why, where, what*): _____

Type of Injury (*cut, sprain, bruise, fracture, etc.*): _____

Which part of body injured (*be specific*): _____

Are there any safety issues that contributed to this accident/injury? *If so, please detail:* _____

List all witnesses to this Accident/Injury: _____

List all prior Accident/ injuries sustained at work and outside of work in the last 10 years (*list dates*): _____

I, employee, the undersigned, certify that the above is a true and correct statement of fact and that I made such statements of my own free will. I understand that any payments to me or anyone else for expenses in connection with my accident and resulting injury is not an admission of liability on the part of **employer**.

Employee Signature

Date Signed

Translated by (*if necessary*)

Supervisor Signature

Date Signed

City of Corona Transit Service, Safety Hazard, Accident, Incident Reporting Form

Reporter's name (leave blank if anonymous):

Phone Number (leave blank if anonymous):

REPORTABLE SAFETY HAZARD, ACCIDENT, or INCIDENT (Check all that apply)

<input type="checkbox"/> 1. Accident / Incident / Passenger	<input type="checkbox"/> 4. Bus Stop Issue
<input type="checkbox"/> 2. Safety Hazard	<input type="checkbox"/> 5. ADA / Accessible Equipment
<input type="checkbox"/> 3. Route Issue	6. Other:

IF AVAILABLE PROVIDE FOLLOWING INFORMATION APPLICABLE TO THE ABOVE ISSUE

INCIDENT DATE:	INCIDENT TIME: AM <input type="checkbox"/> PM <input type="checkbox"/>
LOCATION:	ROUTE / SERVICE: Blue Line <input type="checkbox"/> , Red Line <input type="checkbox"/> , Dial-A-Ride <input type="checkbox"/>
VEHICLE #	OTHER INFO:
DID VEHICLE EQUIPMENT FAIL TO OPERATE PROPERLY? <small>(IF YES, EXPLAIN BELOW IN COMMENTS/DESCRIPTION)</small>	<input type="checkbox"/> YES <input type="checkbox"/> NO
DOES THIS INCIDENT INVOLVE OTHER INDIVIDUALS? <small>(IF YES, EXPLAIN BELOW IN COMMENTS/DESCRIPTION)</small>	<input type="checkbox"/> YES <input type="checkbox"/> NO

ENTER COMMENTS/DESCRIPTION BELOW (if needed attach separate sheet):

TO BE REVIEWED/COMPLETED BY CITY OF CORONA STAFF AFTER RECEIPT OF THE CITY OF CORONA SAFETY, HAZARD, ACCIDENT, INCIDENT FORM

City Staff Name:	Date:
-------------------------	--------------

Title:	Phone #
---------------	----------------

Reviewed with Contractor: <input type="checkbox"/> Yes <input type="checkbox"/> No	Date:
---	--------------

Contractor Staff Name:	
-------------------------------	--

Title:	Phone #:
---------------	-----------------

If regarding an accident, follow up on following information:

Was accident preventable)? <input type="checkbox"/> Yes <input type="checkbox"/> No <small>(IF YES, EXPLAIN ACTION TAKEN UNDER FINDINGS)</small>
--

Were necessary Drug & Alcohol tests performed? <input type="checkbox"/> Yes <input type="checkbox"/> No
--

Was the Agency vehicle totaled? <input type="checkbox"/> Yes <input type="checkbox"/> No

Estimated Cost of Bus Damage: \$	Bus Funding Source:
---	----------------------------

# of parties involved:	# of persons transported for medical treatment:
-------------------------------	--

Follow-up with individual reporting if contact information provided on form? <input type="checkbox"/> Yes <input type="checkbox"/> No
--

FINDINGS:



Safety Committee Members City of Corona Transit Service

Team members in creating and maintaining a safe work environment for fellow employees and helping with system safety and security at City of Corona Transit Service

MV Transportation Staff

Class of Member	Members	Alternates
Management	Catherine Wynne	Britney Pimentel
Dispatcher	Cynthia Wilkerson	
Road Supervisor	Veronica Ramirez	
DAR	David Espinoza	Brevyn Chenault
Corona Cruiser	Glenda Dubriel	Keturah Nick
Maintenance Dept	Alex Sierra	

City of Corona Staff Safety Committee

Title	Member	Alternate
Safety Manger		
Transit Program Manager	Sudesh Paul	Cynthia Lara



The City of Corona

COVID-19 Prevention Program (CPP)



CITY OF CORONA

COVID-19 PREVENTION PROGRAM (CPP)

I. PURPOSE:

The **City of Corona** is committed to provide employees a healthy and safe workplace as required under the California Occupational Safety and Health Act (Labor Code §§ 6300, *et seq.*). As an employer, the City of Corona is required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to the Emergency Temporary Standards in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)).

Nothing in this CPP precludes the City from complying with federal, state, or local laws or guidance that recommends or requires measures that are more prescriptive and/or restrictive than are provided herein.

II. SCOPE

This CPP applies to all City employees, volunteers, and subcontracted employees reporting to work at a City facility and is designed to control employees' exposures to the SARS-CoV-2 virus (COVID-19) that may occur in our workplace. This CPP does not apply to employees who are teleworking.

III. AUTHORITY AND RESPONSIBILITY

The City of Corona Occupational Health and Safety Manager has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all Department managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.


All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment.


IV. DEFINITIONS:

- "COVID-19" means coronavirus disease, an infectious disease caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

Summary of Comments on Memo=TCWD=2012 Person. Iss.=Redlines on Board Memo (3-20-12).doc

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 Number: 1 Author: Author Date: 1/10/2022 1:28:00 PM
Removing hyperlink, no longer available.

 Number: 2 Author: Author Date: 1/10/2022 1:36:00 PM
Need to specify "paid and/or unpaid"?



- “COVID-19 case” means a person who either: (1) Has a positive “COVID-19 test” as defined in this section; (2) Is subject to COVID-19-related order to isolate issued by a local or state health official; or (3) Has died due to COVID-19, in the determination of a local health department or per inclusion in the COVID-19 statistics of a county. A person is no longer a “COVID-19 case” when a licensed health care professional determines that the person does not have COVID-19, in accordance with recommendations made by the California Department of Public Health (CDPH) or the local health department pursuant to authority granted under the Health and Safety Code or title 17, California Code of Regulations to CDPH or the local health department.

“Close contact COVID-19 exposure” means being within six (6) feet of a COVID-19 case for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the “high-risk exposure period” as defined here. This definition applies regardless of the person’s vaccination status.

“COVID-19 hazard” means exposure to potentially infectious material that may contain SARS-CoV-2, the virus that causes COVID-19. Potentially infectious materials include airborne droplets, small particle aerosols, and airborne droplet nuclei, which most commonly result from a person or persons exhaling, talking or vocalizing, coughing, sneezing, or procedures performed on persons which may aerosolize saliva or respiratory tract fluids, among other things. This also includes objects or surfaces that may be contaminated with SARS-CoV-2.

“COVID-19 symptoms” means one of the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person’s symptoms were caused by a known condition other than COVID-19.

“COVID-19 test” means a viral test for SARS-CoV-2 that is both: (1) Approved by the United States Food and Drug Administration (FDA) or has an Emergency Use Authorization from the FDA to diagnose current infection with the SARS-CoV-2 virus; and (2) Administered in accordance with the FDA approval or the FDA Emergency Use Authorization as applicable.

“Exposed workplace” means any work location, working area, or common area at work used or accessed by a COVID-19 case during the high-risk period, including bathrooms, walkways, hallways, aisles, break or eating areas, and waiting areas.

The exposed workplace does not include buildings or facilities not entered by a COVID-19 case. Effective January 1, 2021, the “exposed workplace” also



includes but is not limited to the “worksite” of the COVID-19 case as defined by Labor Code section 6409.6(d)(5).

“Face covering” means a tightly woven fabric or non-woven material with no visible holes or openings, which covers the nose and mouth.

“High-risk exposure period” means the following time period: (1) For persons who develop COVID-19 symptoms: from two (2) days before they first develop symptoms until ten (10) days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved; or (2) For persons who test positive who never develop COVID-19 symptoms: from two (2) days before until ten (10) days after the specimen for their first positive test for COVID-19 was collected.

V. PROGRAM

A. SYSTEM FOR COMMUNICATING WITH EMPLOYEES

1. Reporting COVID-19 Symptoms, Possible COVID-19 Close Contact Exposures, and Possible COVID-19 Hazards at Worksites and Facilities

The City policy requires that employees immediately report to their manager or supervisor or to the Department of Human Resources any of the following: (1) the employee’s presentation of COVID-19 symptoms; (2) the employee’s possible COVID-19 close contact exposures; (3) possible COVID-19 hazards at the City’s worksites or facilities. The employee shall be asked to fill out the “COVID-19 Employee Exposure Questionnaire” located on the City Intranet.

The City will not discriminate or retaliate against any employee who makes such a report.

2. Accommodations Process for Employees with Medical or Other Conditions that put them at Increased Risk of Severe COVID-19 Illness

The City policy provides for an accommodation process for employees who have a medical or other condition identified by the Centers for Disease Control and Prevention (“CDC”) or the employees’ health care provider as placing or potentially placing the employees at increased risk of severe COVID-19 illness.

The CDC identifies the following medical conditions and other conditions as placing or potentially placing individuals at an increased risk of severe COVID-19 illness.

The CDC guidance provides that adults of any age with the following conditions are at increased risk of severe illness from the virus that causes COVID-19:

1. Cancer



2. Chronic kidney disease
3. COPD (chronic obstructive pulmonary disease)
4. Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies
5. Immunocompromised state (weakened immune system) from solid organ transplant
6. Obesity (body mass index [BMI] of 30 kg/m² or higher but < 40 kg/m²)
7. Severe Obesity (BMI ≥ 40 kg/m²)
8. Pregnancy
9. Sickle cell disease
10. Smoking
11. Type 2 diabetes mellitus

The CDC guidance also provides that adults of any age with the following conditions might be at an increased risk for severe illness from the virus that causes COVID-19:

1. Asthma (moderate-to-severe)
2. Cerebrovascular disease (affects blood vessels and blood supply to the brain)
3. Cystic fibrosis
4. Hypertension or high blood pressure
5. Immunocompromised state (weakened immune system) from blood or bone marrow transplant, immune deficiencies, HIV, use of corticosteroids, or use of other immune weakening medicines
6. Neurologic conditions, such as dementia
7. Liver disease
8. Overweight (BMI > 25 kg/m², but < 30 kg/m²)
9. Pulmonary fibrosis (having damaged or scarred lung tissues)
10. Thalassemia (a type of blood disorder)
11. Type 1 diabetes mellitus

The City will periodically review the following web address in order to account for any additional medical conditions and other conditions that the CDC has identified as



placing or potentially placing individuals at an increased risk of severe COVID-19: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html>

City employees are encouraged to review the list of medical conditions and other condition provided above in order to determine whether they have such a condition or seek advise from their health care provider.

To request an accommodation under the City policy, employees may make a request with their manager or supervisor or the Department of Human Resources.

3. COVID-19 Testing

The City possesses authority to require that employees who report to work at City worksites or facilities be tested for COVID-19.

Where the City requires that employees be tested, the City will inform employees why the reason that testing is required.

The City will also inform employees of the possible consequences of a positive COVID-19 test, which may include, but is not limited to, a requirement that employees not report to a City worksite or facility during the high-risk exposure period and satisfying the minimum criteria to return to work.

Where the City requires testing, the City has adopted policies and procedures that ensure the confidentiality of employees and comply with the Confidentiality of Medical Information Act (“CMIA”). Specifically, the City will keep confidential all personal identifying information of COVID-19 cases or persons with COVID-19 symptoms unless expressly authorized by the employee to disclose such information or as other permitted or required under the law.

4. COVID-19 Hazards

The City will notify employees and subcontracted employees of any potential COVID-19 exposure at a worksite or facility where a COVID-19 case and employees were present on the same day. The City will notify employees of such potential exposures within one (1) business day, in a way that does not reveal any personal identifying information of the COVID-19 case.

The City will also notify employees of cleaning and disinfecting measures being undertaken in order to ensure the health and safety of the City worksite or facility where the potential exposure occurred.

B. IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS AT CITY WORKSITES AND FACILITIES

1. Screening City Employees for COVID-19 Symptoms



The City possesses authority to require that employees self-screen for COVID-19 symptoms.

City policy provides that employees will self-screen for COVID-19 symptoms prior to starting normal work duties at a worksite or facility.

2. Responding to City Employees with COVID-19 Symptoms

Should an employee display COVID-19 symptom during a self-screen, the City will instruct the employee to return to their home or place of residence and not report to work until such time as the employee satisfies the minimum criteria to return to work.

The employee will be advised of any leaves to which they may be entitled during this self-quarantine period.

Further, the City has adopted policies and procedures that ensure the confidentiality of employees and comply with the CMIA and will not disclose to other employees the fact that the employees presented COVID-19 symptoms.

3. The City's Response to COVID-19 Cases

In the event that City employees test positive for COVID-19 or are diagnosed with COVID-19 by a health care provider, the City will instruct the employees to return to their home or place of residence and not report to work until such time as they satisfy the minimum criteria to return to work.

The City will advise employees of any leaves to which they may be entitled during this self-isolation period.

The City will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) the local health department; (2) Cal/OSHA; (3) employees who were present at a City worksite or facility when the COVID-19 case was present; (4) the employee organizations that represent employees at the City worksite or facility; (4) the employers of subcontracted employees who were present at the City worksite or facility; and (5) the City workers' compensation plan administrator.

If possible, the City will interview the COVID-19 cases to ascertain the nature and circumstances of any contact that the employees may have had with other employees during the high-risk exposure period. If the City determines that there were any close contact COVID-19 exposures, the City will instruct those employees to return or remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work.

The City has adopted policies and procedures that ensure the confidentiality of employees and comply with the CMIA. Specifically, the City will not disclose to other



employees, except for those who need to know, the fact that the employees tested positive for or were diagnosed with COVID-19. Further, the City will keep confidential all personal identifying information of COVID-19 cases or persons unless expressly authorized by the employees to disclose such information or as other permitted or required under the law.

4. Workplace-Specific Identification of COVID-19 Hazards

The City conducted a workplace-specific assessment of interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards. The City continues to conduct workplace-specific assessments to identify and address the ongoing changing elements to interactions, areas, activities, processes, equipment, and materials that could potentially expose employees to COVID-19 hazards.

As part of this process, the City identified places and times when employees and individuals congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not, including, for example, during meetings or trainings, in and around entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

As part of this process, the City identified potential workplace exposure to all persons at City worksites and facilities, including employees, employees of other entities, members of the public, customers or clients, and independent contractors. The City considered how employees and other persons enter, leave, and travel through City worksites and facilities, in addition to addressing employees' fixed workspaces or workstations.

As part of this process, the City treats all persons, regardless of symptoms or negative COVID-19 test results, as potentially infectious.

5. Maximization of Outdoor Air and Air Filtration

The City will identify and evaluate how to maximize ventilation with outdoor air; the highest level of filtration efficiency compatible with the existing ventilation system; and whether the use of portable or mounted HEPA filtration units, or other air cleaning systems, would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention, including the "*Cal/OSHA-CDPH Interim Guidance for Ventilation, Filtrations, and Air Quality in Indoor Environments*" and information specific to your industry, location, and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (EPA) Air Quality Index is greater than 100 for any pollutant or if



opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

6. Compliance with Applicable State and Local Health Orders

The City monitors applicable orders and guidance from the State of California and the local health department related to COVID-19 hazards and prevention, including information of general application and information specific to the City location and operations.

The City fully and faithfully complies with all applicable orders and guidance from the State of California and the local health department.

7. Evaluation of Existing COVID-19 Prevention Controls and Adoption of Additional Controls

Periodically, the City will evaluate existing COVID-19 prevention controls at the workplace and assess whether there is a need for different and/or additional controls.

This includes evaluation of controls related to the correction of COVID-19 hazards, physical distancing, face coverings, engineering controls, administrative controls and personal protective equipment (PPE).

8. Periodic Inspections

The City will conduct periodic inspections of worksites and facilities as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with the City COVID-19 policies and procedures.

C. INVESTIGATING AND RESPONDING TO COVID-19 CASES IN CITY WORKSITES AND FACILITIES

1. Procedure to Investigate COVID-19 Cases

The City has a procedure for investigating COVID-19 cases in the workplace. As provided below, the procedure provides for the following: (1) the verification of COVID-19 case status; (2) receiving information regarding COVID-19 test results; (3) receiving information regarding the presentation of COVID-19 symptoms; and (4) identifying and recording all COVID-19 cases.

2. Response to COVID-19 Cases

As provided above at Section IV.B.3., in the event that employees test positive for COVID-19 or are diagnosed with COVID-19 by a health care provider, the City will instruct the employees to remain at or return to their home or place of residence and not



report to work until such time as the employees satisfy the minimum criteria to return to work.

a. Contact Tracing

If possible, the City will interview the COVID-19 cases in order to ascertain the following information: (1) the date on which the employees tested positive, if asymptomatic, or the date on which the employees first presented COVID-19 symptoms, if symptomatic; (2) the COVID-19 cases recent work history, including the day and time they were last present at a worksite or facility; and (3) the nature and circumstances of the COVID-19 cases' contact with other employees during the high-risk exposure period, including whether there were any close contact COVID-19 exposure. Contact the Safety Division at 951-279-3645 with Contact Tracing questions you may have.

If the City determines that there were any close contact COVID-19 exposures, they will instruct those employees to remain at their home or place of residence and not report to work until such time as the employees satisfy the minimum criteria to return to work.

b. Reporting the Potential Exposure to Other Employees

The City will comply with all reporting and recording obligations as required under the law, including, but not limited to, reporting the COVID-19 case to the following individuals and institutions as required based on the individual circumstances: (1) employees or volunteers who were present at a worksite or facility when the COVID-19 case was present; and (2) subcontracted employees who were present at the worksite or facility.

c. Free COVID-19 Testing for Close Contact Exposures

The City will provide COVID-19 testing at no cost to employees during their working hours to all employees who had potential close contact COVID-19 exposure at a worksite or facility.

d. Leave and Compensation Benefits for Close Contact Exposures

The City will provide these employees with information regarding COVID-19-related benefits to which the employees may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the federal Families First Coronavirus Response Act (FFCRA), Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, local governmental requirements, the City's own leave policies, and leave guaranteed by contract.

The City will continue to provide and will maintain these employees' earnings, seniority, and all other employee rights and benefits, including the employees' right to their former job status, as if the employees had not been removed from their jobs.



The City may require that these employees use employer-provided employee sick leave benefits for this purpose and consider benefit payments from public sources in determining how to maintain earnings, rights, and benefits, where permitted by law and when not covered by workers' compensation.

e. Investigation to Determine Whether Workplace Conditions Contributed to COVID-19 Exposure

The City will conduct an investigation in order to determine whether any workplace conditions could have contributed to the risk of COVID-19 exposure and what could be done to reduce exposure to COVID-19 hazards.

3. Confidential Medical Information

The City will protect the confidentiality of the COVID-19 cases and will not disclose to other employees the fact that the employees tested positive for or were diagnosed with COVID-19.

The City will keep confidential all personal identifying information of COVID-19 cases unless expressly authorized by the employees to disclose such information or as other permitted or required under the law.

D. CORRECTION OF COVID-19 HAZARDS AT CITY WORKSITES AND FACILITIES

The City will implement effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies and procedures in a timely manner based on the severity of the hazard.

This includes, but is not limited to, implementing controls and/or policies and procedures in response to the evaluations conducted related to the identification and evaluation of COVID-19 hazards and investigating and responding to COVID-19 cases in the workplace. This also includes implementing controls related to physical distancing, face coverings, engineering controls, administrative controls, and personal protective equipment (PPE).

E. TRAINING AND INSTRUCTION OF CITY OF CORONA EMPLOYEES

1. COVID-19 Symptoms

The City provided employees training and instruction on the COVID-19 symptoms, including advising employees of COVID-19 symptoms, which include the following: (1) fever of 100.4 degrees Fahrenheit or higher or chills; (2) cough; (3) shortness of breath or difficulty breathing; (4) fatigue; (5) muscle or body aches; (6) headache; (7) new loss of taste or smell; (8) sore throat; (9) congestion or runny nose; (10) nausea or vomiting; or (11) diarrhea, unless a licensed health care professional determines the person's symptoms were caused by a known condition other than COVID-19.



The City monitors and adheres to guidance by the CDC concerning COVID-19 symptoms, including guidance provided at the following web address:

<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

The City will advise employees in the event that the CDC makes any changes to its guidance concerning such symptoms.

The City provided employees instruction on the importance of not coming to work and obtaining a COVID-19 test if the employees have COVID-19 symptoms.

2. City COVID-19 Policies and Procedures

The City provides regular updates to employees on the City's policies and procedures to prevent COVID-19 hazards at City worksites and facilities and to protect City employees.

3. COVID-19 Related Benefits

The City advised employees of the leaves to which the employees may be entitled under applicable federal, state, or local laws. This includes any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, the City's own leave policies, and leave guaranteed by contract.

Further, when employees require leave or are directed not to report to work the City will advise the employees of the leaves to which the employees may be entitled for that specific reason.

4. Spread and Transmission of the Virus that Causes COVID-19

The City advised employees that COVID-19 is an infectious disease that can be spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales; that COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth, although that is less common; and that an infectious person may have no symptoms.

The City further advised employees of the fact that particles containing the virus can travel more than six (6) feet, especially indoors, so physical distancing must be combined with other controls, including face coverings and hand hygiene, including hand washing, in order to be effective.

5. Methods and Importance of Physical Distancing, Face Coverings, and Hand Hygiene



The City advised employees of the methods and importance of physical distancing, face coverings, and hand hygiene, including hand washing.

Specifically, the City trained and instructed employees on the importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.

Further, the City **has provided** training and instructions to employees on the proper use of face coverings and the fact that face coverings are not respiratory protective equipment. Here is the link to the CDC site for proper selection and use of a face cover. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/about-face-coverings.html>

F. PHYSICAL DISTANCING

The City requires that all employees be separated from other persons by at least six (6) feet, except where the City can demonstrate that six (6) feet of separation is not possible and where there is momentary exposure while persons are in movement.

The City has adopted several methods by which it increases physical distancing including, but not limited to, the following: (1) providing employees the opportunity to temporarily telework or engage in other temporary remote work arrangements; (2) reducing the number of persons in an area at one time, including visitors; (3) posting visual cues such as signs and floor markings to indicate where employees and others should be located or their direction and path of travel; (4) adopting staggered arrival, departure, work, and break times; and (5) adjusting work processes or procedures, such as reducing production speed, to allow greater distance between employees.

When it is not possible for employees to maintain a distance of at least six (6) feet, the City requires individuals to be as far apart as possible.

G. FACE COVERINGS

1. Face Covering Requirement

The City provides face coverings to employees and requires that such face coverings are worn by employees and individuals at City worksites and facilities.

City policy adheres to orders and guidance provided by the CDPH and the local health department, including as provided at the following web address:

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/guidance-for-face-coverings.aspx>

The City's Covid-19 Prevention Plan on the use of face coverings ensures that they are worn over the nose and mouth when indoors, when outdoors and less than six (6) feet



away from another person, and where required by orders from the CDPH or local health department.

The City's policy requires that face coverings be clean and undamaged. The City's policy allows for face shields to be used to supplement, and not supplant face coverings.

The City's policy provides for the following exceptions to the face coverings requirement:

1. When an employee is alone in a room.
2. While eating and drinking at the workplace, provided employees are at least six (6) feet apart and outside air supply to the area, if indoors, has been maximized to the extent possible.
3. Employees wearing respiratory protection in accordance with section 5144 or other title 8 safety orders (8 C.C.R. 5144 is available at the following web address: <https://www.dir.ca.gov/title8/5144.html>).
4. Employees who cannot wear face coverings due to a medical or mental health condition or disability, or who are hearing-impaired or communicating with a hearing-impaired person.
5. Specific tasks which cannot feasibly be performed with a face covering. This exception is limited to the time period in which such tasks are actually being performed, and the unmasked employee shall be at least six (6) feet away from all other persons unless unmasked employees are tested at least twice weekly for COVID-19.

2. **Required Use of Effective Non-Restrictive Alternative for Employees Exempted from Face Covering Requirement**

The City's policy requires that employees who exempted from wearing face coverings due to a medical condition, mental health condition, or disability wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if their condition or disability permits it.

3. **Physical Distancing Required If Employee Is Not Wearing Face Covering or Non-Restrictive Alternative**

Where is the adopted policy that states these requirements? Is this a safety policy?



The City's policy requires that any employees not wearing a face covering, face shield with a drape or other effective alternative, or respiratory protection, for any reason, shall be at least six (6) feet apart from all other persons unless the unmasked employees are tested at least twice (2x) weekly for COVID-19.

However, the City does not use COVID-19 testing as an alternative to face coverings when face coverings are otherwise required by this section.

4. Prohibition on Preventing Employees from Wearing Face Covering

The City does not prevent any employee from wearing a face covering when wearing a face covering is not required by this section, unless not wearing a face covering would create a safety hazard, such as interfering with the safe operation of equipment.

5. Communication to Non-Employees Regarding Face Covering Requirement

The City posts signage to inform non-employees that the City requires the use of face coverings at City worksites and facilities.

6. Policies to Reduce COVID-19 Hazards Originating from Persons Not Wearing Face Coverings

The City has developed COVID-19 policies and procedures to minimize employees' exposure to COVID-19 hazards originating from any person not wearing a face covering, including a member of the public.

These policies include requiring that employees and non-employees wear face coverings at City worksites and facilities, that employees wear face coverings at other times, maintain physical distance from person not wearing a face covering, and observe proper hand hygiene.

H. OTHER ENGINEERING CONTROLS, ADMINISTRATIVE CONTROLS AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Installation of Solid Partitions Between Workstations Where Physical Distancing is Not Possible

At fixed work locations where it is not possible to maintain the physical distancing requirement at all times, the employer shall install cleanable solid partitions that effectively reduce aerosol transmission between the employees and other persons.

2. Maximization of Outdoor Air

As provided above at Section IV.B.5., for indoor worksites and facilities, the City evaluates how to maximize the quantity of outdoor air.



Further, for City worksites and facilities with mechanical or natural ventilation, or both, the City has maximized the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency (“EPA”) Air Quality Index is greater than 100 for any pollutant or if opening windows or letting in outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

3. Cleaning and Disinfecting Procedures

The City’s cleaning and disinfecting policy requires the following:

1. Identifying and regularly cleaning and disinfecting frequently touched surfaces and objects, such as doorknobs, elevator buttons, equipment, tools, handrails, handles, controls, bathroom surfaces, and steering wheels. The City will inform employees and authorized employee representatives of cleaning and disinfection protocols, including the planned frequency and scope of regular cleaning and disinfection.
2. Prohibiting the sharing of personal protective equipment and to the extent feasible, items that employees come in regular physical contact with such as phones, headsets, desks, keyboards, writing materials, instruments, and tools. When it is not feasible to prevent sharing, sharing will be minimized, and such items and equipment shall be disinfected between uses by different people. Sharing of vehicles will be minimized to the extent feasible, and high touch points (steering wheel, door handles, seatbelt buckles, armrests, shifter, etc.) shall be disinfected between users.
3. Cleaning and disinfection of areas, material, and equipment used by a COVID-19 case during the high-risk exposure period.

Further, the City requires that cleaning and disinfecting must be done in a manner that does not create a hazard to employees or subcontracted employees.

4. Evaluation of Handwashing Facilities

To protect employees, the City evaluated its handwashing facilities in order to determine the need for additional facilities, encourage and allow time for employee handwashing, and provide employees with an effective hand sanitizer.

The City encourages employees to wash their hands for at least 20 seconds each time.



The City provides hand sanitizers approved by the CDC.

5. Personal Protective Equipment (PPE)

City policy provides for PPE.

The City evaluates the need for PPE, such as gloves, goggles, and face shields, to prevent exposure to COVID-19 hazards and provide such PPE as needed.

In accordance with applicable law, the City evaluates the need for respiratory protection when the physical distancing requirements, as provided herein, are not feasible or are not maintained.

In accordance with applicable law, the City will provide and ensure use of respirators in accordance when deemed necessary by Cal/OSHA through the Issuance of Order to Take Special Action.



I. IN ACCORDANCE WITH APPLICABLE LAW, THE CITY WILL PROVIDE AND ENSURE USE OF EYE PROTECTION AND RESPIRATORY PROTECTION WHEN EMPLOYEES ARE EXPOSED TO PROCEDURES THAT MAY AEROSOLIZE POTENTIALLY INFECTIOUS MATERIAL SUCH AS SALIVA OR RESPIRATORY TRACT FLUIDS. REPORTING, RECORDKEEPING AND ACCESS

1. Reporting COVID-19 Cases to the Local Health Department

In accordance with applicable law, the City will report information about COVID-19 cases at the workplace to the local health department.

Further, the City will provide any related information requested by the local health department.

2. Reporting Serious COVID-19 Illnesses and Deaths to Cal/OSHA

In accordance with applicable law, the City will immediately report to Cal/OSHA any serious COVID-19-related illnesses or deaths of employees occurring at a City worksite or facility or in connection with any employment.

Further, in accordance with applicable law, the City will record any serious work-related COVID-19-related illnesses or deaths.

3. Maintenance of Records Related to the Adoption of the CPP

In accordance with applicable law, the City will maintain records of the steps taken to implement this CPP.

4. Availability of the CPP for Inspection

The City will make this written CPP available to employees and employee organizations at City worksites or facilities.

Further, the City will make this written CPP available to Cal/OSHA representatives immediately upon request.

5. Records Related to COVID-19 Cases

The City **DICO** will keep record of and track all COVID-19 cases with the following information: (1) employee's name; (2) contact information; (3) occupation; (4) location where the employee worked; (5) the date of the last day at the workplace; and (6) the date of a positive COVID-19 test.



In accordance with the Confidentiality of Medical Information Act (CMIA) and applicable law, the City will keep the employees' medical information confidential.

In accordance with the CMIA and applicable law, the City will make this information available to employees and employee organizations with personal identifying information removed. The City will also make this information available as otherwise required by law.

J. EXCLUSION OF COVID-19 CASES

1. Exclusion of COVID-19 Cases from City Worksites and Facilities

The City will ensure that COVID-19 cases are excluded from the workplace until the individual satisfies the minimum return to work criteria provided for in Section IV.K.

2. Exclusion of Employees with Close Contact COVID-19 Exposures from City Worksites and Facilities

The City will exclude employees with close contact COVID-19 exposure from the workplace for 14 days after the last known close contact COVID-19 exposure.

3. Provision of Benefits to City Employees Excluded from Work as a Result of a Positive COVID-19 Test or Diagnosis or a Close Contact COVID-19 Exposure

a. Employees Who Are Able to Temporarily Telework During Isolation or Quarantine Period

The City will allow employees who are able to temporarily telework, and are able and available to work, to telework during the isolation or quarantine period. The City will provide these employees their normal compensation for the work that they perform for the City during the isolation or quarantine period.

b. Employees Who Are Unable to Temporarily Telework During Isolation or Quarantine Period

The provision of benefits described below does not apply to either: (1) employees who the City can demonstrate that the close contact COVID-19 exposure was not work-related; and (2) employees who are unable to work for reasons other than protecting employees and non-employees at City worksites and facilities from possible COVID-19 transmission. Such employees may still use paid annual leave for the purpose of receiving compensation during the isolation or quarantine period if they elect to do so.



For other employees, the City will require that employees who are unable to telework temporarily but are otherwise able and available to work use paid annual leave to receive compensation during the isolation or quarantine period. Employees retain their entitlement to elect not to use other earned or accrued paid leave during this time. The City may provide such employees who are unable to telework, but who do not have any annual leave available, paid administrative leave in order to receive compensation during the isolation or quarantine period.

For all employees who are subject to an isolation or quarantine because of a COVID-19 case or a close contact COVID-19 exposure, the City will maintain the employees' seniority and all other employee rights and benefits, including the employees' right to their former job status, during the isolation or quarantine period.

The City may consider benefit payments from public sources, including under the FFCRA and Labor Code section 248.1 (until December 31, 2020 or longer if FFCRA leave and/or Labor Code section 248.1 leave is extended), in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers' compensation.

4. Adherence with Laws, Policies, and/or Agreements Providing Excluded Employees Greater Protections

The obligations set forth in this section do not limit any other applicable law, City policy, or collective bargaining agreement that provides employees with greater protections or benefits.

5. Provision of Information Concerning Benefits to Excluded Employees

At the time of exclusion, the City will provide the excluded employees the information on benefits to which the employees may be entitled under applicable federal, state, or local laws.

This includes any benefits available under workers' compensation law, the FFCRA, Labor Code sections 248.1 and 248.5, Labor Code sections 3212.86 through 3212.88, **[any applicable local governmental requirements]**, the City's own leave policies, and leave guaranteed by contract.

K. RETURN TO WORK CRITERIA

1. Minimum Criteria to Return to Work for Symptomatic COVID-19 Cases

City policy requires that COVID-19 cases with COVID-19 symptoms remain at their home or place of residence and not report to any worksite or facility until they satisfy each of the following conditions:



1. At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications.
 2. COVID-19 symptoms have improved; **and**
 3. At least 10 days have passed since COVID-19 symptoms first appeared.
2. **Minimum Criteria to Return to Work for Asymptomatic COVID-19 Cases**

City policy requires that COVID-19 cases who tested positive but never developed COVID-19 symptoms not report to any City worksite or facility until a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.

3. **COVID-19 Testing Not Required in Order to Return to Work**

In accordance with CDC guidance concerning symptom-based strategies for the discontinuation of isolation, the City does not require employees submit to a COVID-19 test, or produce a negative COVID-19 test result, in order to return to work.

4. **Minimum Criteria to Return to Work for Employees Directed to Self-Quarantine or Isolate by a State or Local Health Official**

If employees are subject to an isolation or quarantine order issued by a state or local health official, City policy requires that the employees not report to any City worksite or facility until the period of isolation or quarantine is completed or the order is lifted.

If the order did not specify a definite isolation or quarantine period, then the period shall be 10 days from the time the order to isolate was effective, or 14 days from the time the order to quarantine was effective.

5. **Allowance by Cal/OSHA for an Employee to Return to Work**

If there are no violations of state or local health officer orders for isolation or quarantine, Cal/OSHA may, upon request, allow employees to return to work on the basis that the removal of employees would create undue risk to a community's health and safety.

In such cases, the City will develop, implement, and maintain effective control measures to prevent transmission in the workplace including providing isolation for the employees at the City worksite or facility and, if isolation is not possible, the use of respiratory protection in the workplace.