Introduction

This Standard Operating Procedure (SOP) for the review of the System Safety Program Plans (SSPP) was designed to provide guidance to the NCDOT Public Transportation Division Safety and Training staff as they review the SSPP’s implemented by the local transit systems. The assistance and guidance rendered by the reviews may not be exhaustive and its implementation may not shield the local transit system from liability for third party claims. The review process is designed to provide a resource to assist local transit systems in developing and implementing a safety program for the benefit of their passengers, employees and the public. Each local transit system should develop and implement a comprehensive system safety plan, which includes procedures sufficient to address the risks presented by its system.

The Public Transportation Division of the North Carolina Department of Transportation Standard Operating Procedure (SOP) defines the policies and prescribes the procedures for managing the System Safety Program Plan. Direct questions and comments on the contents of this instruction to the program manager for Safety and Training. This instruction is designed to provide guidance for implementing the System Safety Program Plan for the Community Transportation System and Human Service Transportation System providers commonly known as community transportation systems. The Public Transportation Division may, from time to time, re-designate the core and enhanced program elements as indicated by industry needs.

Chapter 1—HOW TO USE THIS INSTRUCTION
1.1. Background 3
1.2. Concept 3
1.3. Scope 3

Chapter 2—SAFETY REVIEW PROCESS
2.1. Procedures for Reviewing 3

Chapter 3—SYSTEM SELECTION
3.1. Safety and Training Specialists is Responsible 4

Chapter 4—SYSTEM NOTIFICATION
4.1 Community Transportation System for a Safety Review 4

Chapter 5—ON-SITE REVIEW
5.1. Scheduled Safety Review and On-Site of the Community Transportation 5

Chapter 6—TRANSIT AGENCY COMMENT PERIOD
6.1. Notify the Public Transportation Division 6

Chapter 7—CORRECTIVE ACTION IMPLEMENTATION
7.1. Report to the Transit system 6

Chapter 8—FAILURE TO IMPLEMENT CORRECTIVE ACTION
8.1. Final Report by the Transit System 6
Attachment 1: VEHICLE INSPECTION FORM  7
Attachment 2: DRIVER PERFORMANCE REVIEW FORM  8
Attachment 3: SSPP REVIEW QUESTIONNAIRE (SSPP REVIEW QUESTIONNAIRE ATTACHMENT .XLS)

Appendix
   A: Resolution  13
   B: Memorandum of Understanding  14
CHAPTER 1
HOW TO USE THIS INSTRUCTION

1.1. Background. The NCDOT Board of Transportation passed a Resolution for Approval for community transportation system to implement Systems Safety Program Plans, based upon the Memorandum of Understanding (MOU) between the Federal Transit Administration, American Association of State Highway and Transportation Officials, American Public Transportation Association, Community Transportation Association of America dated 30 April 2003. The MOU recommended establishing strategies for implementing System Safety Program Plans, and a policy for providing training and technical assistance to transit systems to assist in the development and implementation of their System Safety Program Plans. The comprehensive requirements for the System Safety Program Plan consist of two parts; (1) the core safety program elements and (2) enhanced safety program elements. It also recommended establishing policy and procedures for continually identifying and eliminating review redundancy, and setting goals and objectives for realigning and reducing compliance reviews as recommended by the Resolution for Approval. The Community Transportation System and Human Service Transportation System providers have the overall responsibility for their system safety program plan. These responsibilities include:

1.1.1. Establish specific provider safety goals and policies.
1.1.2. Designate the safety representative as a member of the provider’s staff and endorse his/her performance rating sheet.
1.1.3. Review quarterly, the status of the provider’s system safety programs plan with the system’s designated safety officer. Document the review in the system safety program plan book.
1.1.4. Ensure that OSHA, federal and state standards and practices are implemented in all work areas.

1.2. Concept. The System Safety Program Plan is an effort to promote safe public transportation services such that each rural transit system in the state that receives federal and/or state funds has an approved System Safety Program Plan. The concept of a core safety program element is simply a safety activity that every public transportation provider should be doing as part of a minimum safety and security program. Core safety program elements should receive adequate resources to support these core activities. While all activities are subject to resource limitations, these core safety and security activities should be a high priority in resource allocation. All transit providers should implement the core safety program elements as the minimum acceptable approach to public transportation safety. The remaining “enhanced” elements of the comprehensive safety and security program should be incorporated into safety efforts as needs are identified and resources are available.

1.3. Scope. The Community Transportation System and Human Service Transportation System provider will incorporate System Safety Program Plan elements with biennial system reviews. The Public Transportation Division will review protocol/program areas to determine the scope and depth of their respective assessment areas for individual sites.

CHAPTER 2
SAFETY REVIEW PROCESS

2.1. Procedures or process for reviewing and approving a transit agency SSPP; Attachment 1, 2, and 3 of this directory lists compliance items that support guidance in System Safety Program will be used by the Safety and Training Unit during site reviews. Should the NCDOT determine a SSPP does not meet the state safety program standard, the NCDOT notifies the transit agency of those elements requiring updates or modification, using the conformance checklist. The Safety and Training Unit of the Public Transportation Division shall schedule and conduct safety reviews and monitor the affected transit system’s implementation of review recommendations. The Safety and Training Unit consists of a Program Manager and three Safety and Training Specialists. Two of the specialists are assigned systems and will conduct safety reviews, in their assigned systems. The third Safety and Training Specialist provides logistics and technical support for training workshops delivered by and to the division and its grantees. The Program Manager will also conduct safety reviews as necessary; for example for training purposes, as requested by senior management, or to maintain program consistency when specialists are absent. The Program Manager of the Safety and Training Unit is responsible for daily program oversight.
CHAPTER 3
SYSTEM SELECTION

3.1 Each Safety and Training Specialist is responsible for scheduling safety reviews in their assigned systems. Each Specialist shall prepare a 12-months review schedule that will be posted on the Public Transportation Division’s website. System safety reviews shall be scheduled based upon a staff analysis of each system’s accident/incident history and training history. Accident/incident history data used is historical data maintained by the Public Transportation Division based on quarterly reports submitted to the Division by all community transportation systems. It is the responsibility of the Safety and Training Unit to ensure that the data used is current and incorporates the last incident/accident report submission. Training history and effort will be reviewed using criteria of, but not limited to, the following: (1) consistent training emphasis from year to year, (2) training response to specific incidents, and (3) provision of refresher/remedial/upgrade training for employees at appropriate intervals. Those systems with documented high accident/incident rates or low training effort will be among those systems scheduled in the 12-months review schedule. The review schedule may be revised by the Safety and Training Unit to reflect changes in historical data and the systems will be informed of any such changes.

CHAPTER 4
SYSTEM NOTIFICATION

4.1. When the Safety and Training Unit schedules a community transportation system for a safety review, the system will be notified of the scheduled date of the review by e-mail correspondence at least 60-days in advance of the scheduled review. A hard copy of the notification will then be mailed on official Public Transportation Division letterhead. In this initial mail correspondence, blank copies of the standard safety review program forms utilized by the reviewer in the course of the safety review to collect system safety information will be included. A list of the standard program forms and their descriptions are as follows:

4.1.1. SSPP Review Schedule
4.1.2. An outline of all safety review activities with an expected timeline
4.1.3. Vehicle Inspection Form “Attachment 1”
4.1.4. Driver Performance Review Form “Attachment 2”
4.1.5. SSPP Review Questionnaire (Assessment questions based on national Community Transportation Administration Association (CTAA) Training and Safety Review Program) “Attachment 3”

4.2. The community transportation system will answer all the questions on the attachment 3. The completed attachment 3 will be returned to the Public Transportation Division within 30-days after receiving the notification package. If there is an area of concern, it will be addressed during the on-site visits. The Safety and Training Specialist will review the attachment 3. After reviewing, answers will be verified to ensure it complies with Systems Safety Program Plan. The Safety and Training Specialist will then confirm the schedule on-site visit with time and date of appointment.

4.3. The purpose of providing review program forms and notice of review criteria to the transit system prior to the on-site review is in keeping with the values of PTD’s Safety Review Program. It is the intent of the Safety Review Program to provide feedback in a constructive manner. The appropriate Safety and Training Specialist is available to answer questions regarding scheduling and the content of the review materials prior to the scheduled on-site review date.

4.4. Prior to on-site review Safety and Training Specialists shall conduct a desk review of all available information pertaining to the safety plan of the affected transit system. This will performed in the 60-days period prior to the date of the on-site review. Information to be reviewed shall include, but is not limited to, the following information:

4.4.1. Review of the approved safety plan, including any revisions
4.4.2. Review of trends in the transit system’s accident/incident history
4.4.3. Review of drug and alcohol testing compliance history
4.4.4. Safety and Training Specialists will consult with appropriate Public Transportation Division staff to discern any outstanding issues or concerns prior to the on-site review
4.4.5. Review of history of training provided at that system
CHAPTER 5
ON-SITE REVIEW

5.1. Entrance Conference: On the date of the scheduled safety on-site review of the community transportation system, the first order of business shall be an entrance conference between the reviewer and the Transit Director, Executive Director, the Safety Director, Authorized Official and/or others as the transit system deems necessary. The purpose of this conference is to finalize the safety review schedule and answer any preliminary questions regarding any aspect of the safety review process and/or assessment materials. The transit system will assign a staff member to accompany the Safety and Training Specialist from Public Transportation Division throughout the on-site review.

5.2. Conduct Safety Review: The reviewer shall conduct a safety review that shall include, but is not limited to, the following activities:
   5.2.1. Tour of the facility
   5.2.2. Review of system files pertaining to accident/incident and training history
   5.2.3. Inspection at least 50 percent of assigned fleet. (Minimum of two vehicles or more, as warranted)
   5.2.4. Interviews with various employees associated with the safety management of the transit system
The standard forms mailed to the transit system 60-days prior to the scheduled safety review shall be used by the reviewer as the basis for the on-site data collection and assessment of the transit system’s safety plan.

5.3. The community transportation system will have available to the Safety and Training Specialist the latest Driver Evaluations of all drivers currently employed by the system or its contractor for a period of 12-months and no less than 90-days from date of hire. It is expected that each driver will have an initial (probationary) evaluation and at least one evaluation per quarter following the probationary period. If less than 100 percent of the drivers have been evaluated during the previous 12-months, the Safety and Training Specialists will schedule a subsequent visit to evaluate at least 20 percent of the drivers. If the results are unfavorable, the specialist will perform additional driver evaluations as needed.

5.4. The Safety and Training Specialist will conduct a random inspection of 50 percent of the vehicles assigned to the fleet. A minimum of two vehicles will be inspected at random. If the results are unfavorable, the specialist will inspect 100 percent of the fleet. The specialist may also determine if additional inspections will be required in order to make a true evaluation of the entire fleet of vehicles assigned. This may require an additional visit.

5.5. Meeting with Authorized Official (optional): the reviewer shall be available for a meeting with the authorized official Board Member or other individuals upon request of the transit system director or above name persons.

5.6. Exit Conference: Upon completion of the safety review, the reviewer shall meet with the Transit Director or designee to discuss review findings and schedule corrective actions if necessary. The reviewer shall explain the remainder of the safety review process to transit officials, including the release of the final report, the documentation of deficiencies, the time allowed for corrective action, the notification process for acceptance of corrective actions, and the consequences of failure to correct deficiencies within an allotted timeframe. The availability of technical assistance to correct deficiencies identified in the safety review shall also be discussed at this time. The reviewer shall obtain the signature of the transit director or designee on the SSPP Review Checklist Form as completed by the reviewer in the course of the safety review. A copy of this signed document shall be given to the transit system for their records.

5.7. Draft Final Report: After completion of the on-site safety review, the reviewer shall analyze the data collected and prepare a draft report that shall include recommendations for corrective actions. This draft report shall be reviewed internally. Upon completion of the review and comment period, the reviewer shall incorporate comments as necessary and send the final report to the transit system within 30 business days.
CHAPTER 6
TRANSIT AGENCY COMMENT PERIOD

6.1. The transit system must notify the Public Transportation Division in writing within five days of any factual errors of discrepancies in the final report. E-mail notification is acceptable as preliminary notification, but the e-mail must be followed by an original letter or memorandum on transit system official stationary signed by the transit system director. If notified of such discrepancies or errors, the reviewer shall determine if said corrections/discrepancies require incorporation into a revised edition of the original report.

CHAPTER 7
CORRECTIVE ACTION IMPLEMENTATION

7.1. If no errors or discrepancies are detected in the original report, and PTD is not notified within five days the transit system will notify the Safety and Training Specialist via email or fax. In addition, the system shall begin implementation of the recommendations developed from data collected and analyzed during the on-site safety review and outlined in the final report. When all corrective actions listed in the final report are implemented, the transit system shall notify the Public Transportation Division of this completion in writing. Upon receipt of formal notification of corrective action completion, the Public Transportation Division shall send the transit system a notification of completion of all corrective actions recommended during the safety review. Follow-up visits by the Public Transportation Division may be warranted.

CHAPTER 8
FAILURE TO IMPLEMENT CORRECTIVE ACTION

8.1. If, after 60-days of receipt of the final report by the transit system, all corrective actions outlined in the final report of the safety review are not implemented, the Public Transportation Division shall send the transit system a formal notice of non-compliance. Any implementation item requiring more than 60-days to complete shall be approved by the Safety and Training Specialist prior to submission of completion by the transit system.
Attachment 1

**VEHICLE INSPECTION FORM**

<table>
<thead>
<tr>
<th>Date: ___________________________</th>
<th>Vehicle: ___________________________</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mileage: _________________________</td>
<td>Maintenance due date: ________________</td>
</tr>
</tbody>
</table>

**UNDER the HOOD**

- Oil level
- Oil added ___ quarts
- Radiator level
- Battery level
- Windshield washer fluid level
- Engine/hoses/belts

**SAFETY EQUIPMENT**

- Fire extinguisher
- Web cutter
- Triangles
- First aid kit
- Back-up alarm
- Rear door buzzer (LTV only)
- Biohazard kit

**EXTERIOR**

- Tires
- Turn signals
- Headlights
- Tail/brakes lights
- Windshield wipers
- Fresh body damage
- Cleanliness
- Cycle lift (light oil every 2 wks)

**INTERIOR**

- Brakes
- Steering
- Transmission
- Mirrors
- Gauge/instruments
- Controls (equipment)
- Radio (two-way)
- Damage/cleanliness

**ACCESSIBILITY EQUIPMENT**

- Fully operable wheelchair lift or ramp mechanism
- Proper number of belts and securement devices
- Belts and securement devices in good condition

**Notes:**

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

Inspector signature: ______________________________
**Driver Performance Review Form**

**Passenger Reception**
The Driver…
1. Asks the name of the passenger and the destination before boarding, unless the passenger is a subscription rider.
2. Is available at the door to assist the passenger on or off the vehicle (if needed).
3. Acts courteously, offers help by asking, “may I help” or “how may I help you?”
4. Follows guidance from the passenger, if help is needed.
5. Uses the passenger’s instructions to assist in boarding and exiting the vehicle, if needed.
6. Stops the vehicle (6) six inches or (4) four feet from curb to keep passengers from falling off the vehicle as they load and unload. (This depends on the stopping or parking situation.)
7. Uses AM or FM radio only when passengers are not aboard, then only for the news and weather forecast.
8. Uses correct language under ADA guidelines. (Refer to the ADA handout given to drivers who have taken the SNAAP training.)

**Vehicle Condition**
The Driver…
1. Performs a pre-trip inspection and completely fills out the pre-trip inspection form before starting the first run of the day.
2. Checks the inspection sticker to be sure it has not expired.
3. Knows where the registration card can be found at all times.
4. Has current driver license and current route logs on person at all times.
5. Vehicle is clean on exterior.
6. Vehicle is kept clean inside at all times.
7. Nothing is on the dashboard, rear view mirror, or sun visors, that could create a hazardous situation.
8. Safely attaches tie down straps into floor tracks, and use the four-point tie down on wheelchairs.
9. Removes tie downs from floor after each use. Stores tie down straps in their proper place.
10. Seat belts/tie down straps are not tangled, missing or broken.
11. Checks fire extinguisher for expiration date.
12. Checks the first aid kit daily and re-supplies when needed. Checks Bloodborne Pathogen Kits regularly (PPE).
13. Checks batteries daily to make sure flashlight is usable. (If applicable)
14. Tests the two-way radio.
15. Child seats are placed in vehicle properly and stowed when not in use.
16. Fills out daily defect report correctly.
17. Checks lift by running through one cycle before leaving base.
18. Keeps logs up to date as trip is completed for each passenger.

**Performance Enroute**
The Driver…
1. Does not slouch in the seat while driving. Arms are not on or out of the window frame.
2. Aims high in steering.
3. Both hands are on the steering wheel at the 9 and 3 or the 10 and 2 position. Gets the big picture.
4. Clothing should be appropriate for job, clean and pressed with no short-shorts or cut-off shorts. Shoes are fully covering foot. (No sandals, flip-flops, or open toed shoes.)
5. Uses seat belt correctly and requires correct use of seat belt for all passengers.
6. Gets out and looks behind vehicle, for obstacles, before backing.
7. Adjusts mirrors before leaving base (for safety and visibility). Keeps eyes moving.
8. Uses signals for all maneuvers in traffic. Leaves an out.
9. Does not jerk the vehicle when stopping and starting. Uses the brakes without stomping or slamming (stops vehicle smoothly).
10. Presses the brakes slightly to warn tailgaters to slow down or uses flashers when coming to a quick stop.
11. Does not whip around corners. Slows down to 2 to 5 miles per hour when turning corners. Positions vehicle for
proper safe turns. (Squares the corner.)
12. Does not travel too slow or too fast for conditions on the road or for the posted speed limit.
13. Keeps four seconds distance between vehicles ahead and his.
14. Does not start into the intersection without proper caution, uses the four second rule. Keeps safety cushion under control.
15. Slows down when green light has been green for sometime at a distance.
16. Makes sure passenger is in seat and properly belted in.
17. Stops 15 to 50 feet from railroad tracks and uses flashers (Opens door when possible).
18. Stops at the plane of the intersection before entering traffic from parking lot etc.
19. Checks mirrors, looks over shoulder, signals, moves into passing lane, signals and returns to proper lane. Leaves (himself/herself) an out.
20. Stops behind plane of intersection. Does not cross over white line at the intersection.
21. Answers agency’s or company’s 2-way radio properly. Uses proper radio language and 10- codes. Does not use profanity and observes FCC regulations. Sensitive to the passengers need for confidentiality.
22. Signals at proper distance for an intended turn. Cancels signal when maneuver is completed. Makes sure they see him/her.
23. Does not allow profanity or misbehavior in the vehicle.
24. Keeps schedule safely, does not jeopardize safety for schedule.
25. Only transports passenger on route schedule. No unauthorized passengers or stops.
26. Keeps the four-second rule in mind when following some one in all dry weather conditions. Adds seconds when weather conditions dictate a change in driving behavior. Keeps safety cushion in control.

**Passenger Discharge:**

**The Driver...**

1. Uses parking brake when de-boarding passengers.
2. Stops the vehicle 6 inches to 4 feet from curb to discharge passengers. Assists passenger off vehicle.
3. Renders correct assistance to passengers in wheelchairs, using all precautions with lift while moving passenger off vehicle. Attends to all other passengers requesting or requiring assistance.
4. Advises base of absence from vehicle and advises base of return to vehicle. Does not leave elderly and disabled passengers unattended. Makes sure they are in the hands of caretakers or inside their homes/destinations before driver leaves the property (case by case judgments).
5. Does whatever the passengers need in the way of assistance according to driver’s duty and the ADA rules of assistance.
**DRIVER PERFORMANCE REVIEW FORM**

Date of Evaluation______________

Driver’s Name ________________________________

Evaluator’s Name/Position________________________

**Passenger Reception**

1. ☐ Confirms identity/destination of passenger
2. ☐ Present at entry door while boarding
3. ☐ Greets passenger in a friendly manner
4. ☐ Uses proper assistance techniques
5. ☐ Assists passengers to and from the vehicle door if needed
6. ☐ Stops proper distance from curb
7. ☐ Avoids use of AM/FM radio
8. ☐ Uses correct ADA language at all times

**Vehicle Condition**

1. ☐ Daily pre-trip inspection complete/documentated
2. ☐ Checks for valid inspection sticker
3. ☐ Registration card in vehicle
4. ☐ Driver’s license/logs with driver
5. ☐ Vehicle exterior clean
6. ☐ Vehicle interior clean
7. ☐ Dashboard/windshield area clear of all objects
8. ☐ Tie downs properly employed
9. ☐ Tie downs clean/ stowed in box
10. ☐ Seat belts in good working condition
11. ☐ Fire extinguisher is current
12. ☐ First Aid/Bloodborne pathogen kit available in vehicle
13. ☐ Flash light working (if applicable)
14. ☐ Radio operable
15. ☐ Child seat used/stowed properly
16. ☐ Daily defect report filled out
17. ☐ Lift operation check
18. ☐ Keeps logs up to date

**Performance While Enroute**

1. ☐ Driver uses correct posture when driving
2. ☐ Correct hand positions on steering wheel
3. ☐ Appropriate uniform/footwear
4. ☐ Driver and passengers use seatbelts
5. ☐ Driver gets out of vehicle and looks before backing
6. ☐ Adjust mirrors before moving vehicle. Keeps eyes moving
7. ☐ Signals entry into traffic every time. Leaves himself an out
8. ☐ Moves vehicle smoothly while slowing braking and stopping. Make sure they see you
9. ☐ Telegraphs use of brake or flashers when stopping
10. ☐ Squares corners when turning
11. ☐ Moves at appropriate speeds for current road conditions
12. ☐ Maintains following distance safety zone (4 seconds)
13. ☐ Uses proper caution at intersections
14. ☐ Anticipates stale green lights (slows down)
15. ☐ Seats passengers properly
16. ☐ Stays at all railroad crossings
17. ☐ Comes to a complete stop, leaving private property
18. ☐ Uses proper lane changing procedure
19. ☐ Stays behind line or plane at intersections
20. ☐ Observes proper two-way radio procedure
21. ☐ Uses turn signals properly
22. ☐ Maintains order in vehicle
23. ☐ Maintains scheduled stops and pick-ups
24. ☐ Avoids unauthorized stops
25. ☐ Uses four second distance rule, adds seconds to following distance when driving conditions change. Keeps safety cushion

Passenger Discharge

1. ☐ Uses parking brake when de-boarding passengers
2. ☐ Stays proper distance from curb. Assist passengers off vehicle (when needed or when passengers request help)
3. ☐ Renders adequate assistance to wheelchair passengers
4. ☐ Advises Base when leaving vehicle and upon return to vehicle
5. ☐ Makes sure passenger is safely inside of destination before leaving property
6. ☐ Follows passengers instruction for assistance when needed

Comments

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

Course of Action (required/taken)

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________
Driver’s Signature  

Date

Supervisor’s Signature  

Date

Driver’s Comments


RESOLUTION FOR APPROVAL OF REQUIREMENT FOR COMMUNITY TRANSPORTATION SYSTEMS TO IMPLEMENT SYSTEM SAFETY PROGRAM PLANS

WHEREAS, the Federal Transit Administration’s strategic safety goal is to promote the public health and safety by working toward the elimination of transportation related deaths, injuries and property damage;

WHEREAS, the Federal Transit Administration and the National Transportation Safety Board require the reporting of certain transportation related accidents;

WHEREAS, the vision for public transportation services in North Carolina includes the provision of safe, affordable transportation choices, statewide to those who have travel options and to those whose options are limited;

WHEREAS, the development and implementation of System Safety Program Plans by Community Transportation systems is a fundamental step toward these goals;

WHEREAS, the North Carolina Department of Transportation, Public Transportation Division recognizes the safety implications of the development of System Safety Program Plans and provides training and technical assistance to transit systems to assist in the development and implementation of their System Safety Program Plans;

WHEREAS, rural transit systems receiving federal and state funds are not currently required to have a System Safety Program Plan;

WHEREAS, the Public Transportation Division, in an effort to promote safe public transportation services recommends requiring that each rural transit system in the state that receives federal and/or state funds must have an approved System Safety Program Plan which includes provision for local system safety data collection and reporting;

WHEREAS, the Transit, Rail and Ferry Committee has concurred in this recommendation.

THEREFORE BE IT RESOLVED AS FOLLOWS:

That the North Carolina Board of Transportation approves the recommended requirement that each Community Transportation System that receives federal and/or state funds must have an approved System Safety Program Plan which includes provision for local system safety data collection and reporting.

ADOPTED BY THE NORTH CAROLINA BOARD OF TRANSPORTATION AT ITS SEPTEMBER 5, 2002 MEETING.
Memorandum of Understanding

Between the

Federal Transit Administration
American Association of State Highway and Transportation Officials
American Public Transportation Association
Community Transportation Association of America

In Regard to the

FTA Model Transit Bus Safety and Security Program

Introduction

The Federal Transit Administration (FTA) has developed a Model Transit Bus Safety and Security Program in cooperation with the American Public Transportation Association (APTA), the Community Transportation Association of America (CTAA), the American Association of State Highway and Transportation Officials (AASHTO), and other representatives from the transit bus industry. This effort has culminated in a draft Program that has been accepted in principle by the FTA and its industry partners.

This Memorandum of Understanding is an agreement in principle to:

- Promote the Model Transit Bus Safety and Security Program
- Provide support to further the Program
- Assess the activities of the signing parties’ constituents in implementing the Program.

The four partner organizations’ representatives signify the acceptance of the Model Program and demonstrate the commitment of their organizations to its objectives by their signatures to this Memorandum of Understanding.

Model Transit Bus Safety and Security Program Elements

The Model Program contains two general categories of Program elements: Core Safety Program Elements and Enhanced Safety Program Elements. Collectively, these elements define the comprehensive FTA Model Transit Bus Safety and Security Program.

---

1 The Model Program will be published as an FTA report in response to National Transportation Safety Board recommendations (PB98-917006, NTSB/SIR-98/03).
Core Safety Program Elements are the safety program elements that all transit providers should implement. Core elements apply to all Section 5307 and 5311 transit providers. As the size and resources of the transit provider increase or as operational experience indicates additional needs, the transit provider should implement applicable Enhanced Safety Program Elements. In cases where service is contracted with 5307 or 5311 funds, the grantee shall ensure that the contractor would implement the core and enhanced safety program elements as applicable. Section 5310 provider participation in a safety and security program is subject to state discretion however Section 5310 provider participation is encouraged. The degree of applicability is largely dependent on operations. The scope of applicability will be defined in the individual technical assistance materials.

The Core Safety Program Elements include:

- Security
- Driver/Employee Selection
- Driver/Employee Training
- Vehicle Maintenance
- Drug and Alcohol Abuse Programs
- Safety Data Acquisition and Analysis

Enhanced Safety Program Elements improve the transit provider’s safety program beyond the Core Safety Program Elements. Transit providers in urban areas typically include these elements. Other transit providers should expand their safety program as their services, resources, and infrastructures grow to include Enhanced Safety Program Elements as a part of a continuous improvement approach to transit bus safety and security. The Enhanced Safety Program Elements are grouped into three general categories:

- Safety Process-Centric Elements – These elements focus on understanding the safety issues within the transit bus operations (accidents, incidents, and hazards) so that resources can be properly directed.

- Human-Centric Elements – These elements focus on processes or procedures that are directed toward driver and employee safety issues.

- Infrastructure and Equipment-Centric Elements – These elements address safety issues related to the transit system vehicles and general infrastructure.

Attachment A to this Memorandum contains additional definitions of the Core Safety Program Elements and additional information about the Enhanced Safety Program Element categories.

Implementation Approach

The Partners agree that the voluntary approach to implementation will be used to assess transit provider implementation of the Model Program requirements. The voluntary approach to implementation requires good faith efforts on the part of grantees and the national partner organizations with an expectation that the absence of a more formal regulatory structure will not be detrimental to overall Model Program objectives.

Under the voluntary approach, implementation is expected on a voluntary basis – a regulatory or contractual directive for implementation of the Model Program for transit system grantees (and subrecipients) is not proposed by FTA. However, if the FTA determines that this approach to implementation is not satisfactory for ensuring implementation, the FTA reserves the right to revisit the
issue of the Implementation Approach. States, however, do have the right to adopt more prescriptive requirements.

Examples of acceptable approaches include those developed by the partners, individual DOTs, insurance pools, and other industry groups.

- APTA's Bus Safety Management Program
- CTAA's Community Transportation Training and Safety Review Program
- Bus Safety programs developed by state transportation departments
- Safety programs of insurance pools
- Fleet safety program of the National Safety Council
- Safety program guidelines of transit management training programs
- Local transit operating agency safety programs and procedures

FTA and its Partners recognize that under the voluntary approach there is no single safety model within the industry which must be adopted by transit systems or states overseeing such systems. The key agreement in this understanding is that the appropriate safety elements for the type of transit system be developed and implemented. In other words, any model which embraces the appropriate core elements will comply with the intent of the FTA approach. Examples of acceptable approaches could include those developed by the Partners, individual DOTs, insurance pools and other industry groups.

In regards to bus safety and security programs, FTA Triennial Reviews and State Management Reviews will identify areas of concern relative to the voluntary compliance practices and specify recommended improvements rather than audit compliance on a “comply/not comply” basis.

**Role of the FTA and the States in Assessing Transit Provider**

The FTA will assess implementation with the Model Transit Bus Safety and Security Program by its direct grantees through the Triennial Review Program or another similar approach. The States will assess the implementation of the Model Transit Bus Safety and Security Program by their Section 5311 sub-recipients in a manner similar to that which the States use for assessing sub-recipient compliance with other FTA requirements. Section 5310 grantees would be exempt from the Model Program requirements, but encouraged to implement the Core Safety Program Elements. FTA and the States will conduct these assessments in a cooperative and positive manner with the grantees, promoting a proactive environment to assist transit systems in meeting the Model Program requirements.

**FTA Technical Assistance and Outreach**

The FTA, in cooperation with the Partners, will develop and disseminate appropriate technical assistance and outreach materials to be used by the FTA staff, the Partners, and the transit system grantees in implementing the Model Program. FTA efforts will include training through the Transportation Safety Institute (TSI), the National Transit Institute (NTI) and other activities, to the extent possible. Attachment B contains additional descriptions of anticipated FTA technical assistance and outreach.
Responsibility of All Parties in Promoting the Program

The Partners to the Model Program will actively **promote** the Program and its objectives; will provide **support** to further the Program; and will **assess** the activities and performance of their constituents in implementing the Model Program. These efforts will incorporate all reasonable actions necessary to ensure good faith efforts by transit providers in developing and maintaining their own Transit Bus Safety and Security Programs.

Commitment to Program Improvement Efforts

The Partners will review the Model Program on a regular basis and revise it, as appropriate, to meet the objectives of furthering transit bus safety and security. The Partners agree to meet on a regular basis to discuss positive aspects of the Program, along with areas needing improvement. The Partners also agree to implement those changes to the Program, as appropriate, to continue to enhance transit bus safety and security.

_________________________
Federal Transit Administration

American Public Transportation Association

_________________________
American Association of State Highway and Transportation Officials

Community Transportation Association of America

American Association of State Highway and Transportation Officials
Standing Committee on Public Transportation

Date ___________________
Attachment A

Safety and Security Program Elements
FTA Model Transit Bus Safety and Security Program

The comprehensive requirements for the FTA Model Transit Bus Safety and Security Program consist of two parts; (1) the core safety program elements and (2) enhanced safety program elements.

The concept of a core safety program element is simply a safety activity that every transit bus provider should be doing as part of a minimum safety and security program. Core safety program elements should receive adequate resources to support these core activities. While all activities are subject to resource limitations, these core safety and security activities should be a high priority in resource allocation.

All transit providers should implement the core safety program elements as the minimum acceptable approach to transit bus safety. The remaining “enhanced” elements of the comprehensive safety and security program should be incorporated into safety efforts as needs are identified and resources are available.

The concept of an enhanced safety program element is used to describe safety and security activities that go beyond the scope of the core requirements. Enhanced program elements are those safety and security activities that will enhance safety and security program effectiveness for the larger and more complex transit bus providers. The transit provider’s safety and security program should grow with the transit provider’s services, resources, and infrastructure to continuously and proactively manage safety throughout their operations.

Large transit bus providers, with adequate resources, typically have a need for all or most of these enhanced elements in their safety and security programs. Smaller transit bus providers should incorporate these enhanced elements as their size and/or responsibilities grow or as the need is indicated by operational safety and security experience to further improve their safety program.

The following table lists the program elements for the comprehensive FTA Model Transit Bus Safety and Security Program. Core program elements are identified in the table and are further defined in the paragraphs following the table. Enhanced elements are further described in the FTA report defining the Model Program. This attachment describes the current delineation of core and enhanced program elements. However, FTA may, from time to time, redesignate the core and enhanced program elements as indicated by industry needs.
### Safety and Security Program Elements
FTA Model Transit Bus Safety and Security Program

| Security* | • Rules/Procedures Review  
|           | • Contractor Safety Coordination |
| Safety Process-Centric Elements | **Infrastructure & Equipment-Centric Elements**  
| • Safety Data Acquisition/Analysis*  
| • Accident/Incident Reporting & Investigation  
| • Hazard Identification/Resolution Process  
| • Emergency Response Planning, Coordination and Training  
| • Internal Safety Audit Process  
| • Rules/Procedures Review  
| • Contractor Safety Coordination |
| **Human-Centric Elements** | **Human-Centric Elements**  
| • Driver/Employee Selection*  
| • Driver/Employee Training*  
| • Drug & Alcohol Abuse Programs*  
| • Employee Safety Program  
| • Fitness for Duty (additional requirements beyond the drug and alcohol FFD requirements)  
| • Vehicle Acquisition  
| • Vehicle Maintenance*  
| • Facilities Inspections  
| • Maintenance Audits/Inspections  
| • Hazardous Materials Program  
| • Alternative Fuels and Safety  
| • System Modification Review/Approval Process  
| • Interdepartmental/Interagency Coordination  
| • Configuration Management  
| • Procurement  
| • Operating Environment and Passenger Facility Management  
| • Dedicated Busway or Roadway Inspection and Maintenance  
| * Core Safety Program Element |

### Core Safety and Security Program Element Descriptions

**Security:**
The security of passengers and employees is paramount to promoting the objectives of the FTA and its partner organizations in developing a Model Program. Transit providers must take all reasonable and prudent actions to minimize the risk associated with intentional acts against passengers, employees and equipment/facilities. To further this objective, transit providers will need to develop security plans and procedures and emergency response plans and procedures. The plans must include coordination with local law enforcement and with other regional transit providers, the conduct of exercises for their emergency plans, and assessment of critical assets and measures to protect these assets.

**Driver/Employee Selection:** Driver selection is critical to safe transit operations. The driver of a transit vehicle is directly responsible for the safety of their passengers and other motorists that share the road with transit buses. The transit provider should have a clear definition of driver qualifications and background. This applies to all safety-critical employees, both paid and volunteer.

**Driver/Employee Training:** Once qualified candidates are identified and hired, initial and on-going training is critical to insure proper operations and adherence to the transit providers’ rules and regulations. Proper qualification of operating and maintenance personnel is a vital part of a safe transit environment. Driver training should address specific safety-related issues appropriate to the type of vehicle and driving assignment including fitness for duty.
**Vehicle Maintenance:** Proper maintenance of vehicles and equipment is critical to the continued safe operation of the transit system. Unsafe vehicles present unnecessary hazards to the driver, passengers, and other vehicles on the road. Basic vehicle maintenance practices must regularly address safety-related vehicle equipment to ensure that no unsafe vehicles are dispatched for service.

**Drug and Alcohol Abuse Programs:** Since many transit providers receive FTA operating and capital funds, the FTA Drug Testing Requirements form the basis for drug abuse programs. An alcohol abuse program is also required. The bottom line is protection of the riding public and transit employees, and all efforts should be geared toward this end. The transit provider’s safety program should outline the specific policies, procedures and responsibilities, or reference the appropriate master document containing that information.

**Safety Data Acquisition/Analysis:** Understanding safety data is an important step toward allocating important (and often scarce) resources to implement safety program elements. Safety data relative to transit provider operations can be used to determine safety trends in system operation. These data include information gathered from within the system on safety-related events such as passenger injuries or claims, employee injuries, accidents, incidents, and preventability. Driver reports (sometimes called logs) can be an important source of safety problems, such as dangerous stop locations, problems with bus equipment, safety problems with the route, and other issues. The data are useful in a formal hazard identification and resolution process to help identify hazards before they cause accidents. The data may also help improve system performance, not only in respect to safety, but also in overall delivery of service to the riding public. In addition, trend analyses of safety data can help determine the effectiveness of safety initiatives that have been implemented.
Attachment B

FTA Technical Assistance and Outreach Activities
FTA Model Transit Bus Safety and Security Program

The FTA in concert with its Partners is committed to develop and disseminate appropriate technical assistance and outreach materials to be used by its staff, its Partners (AASHTO, APTA, and the CTAA), and the transit system grantees in implementing the Model Program. These technical assistance activities will include training through TSI, NTI and other Partner and industry sources, as resources permit. The following list provides examples of technical assistance activities and products that, to the extent possible, FTA will provide as part of their continuing promotion and support of the Model Program.

- Technical guidance on criteria to be used for determining appropriateness of “Enhanced” Safety Program Elements
- Manuals for the development of model Transit Bus Safety and Security Programs
- Manuals for assisting the states in conducting assessments of sub-recipients
- Training programs for transit providers and states
- Training classes for transit providers and state representatives
- Manuals for developing System Safety Program Plans and Security Program Plans
- Identification and dissemination of transit bus safety “best practices”
- Presentations/facilitation of discussions at conferences and workshops
- Informational brochures and program summaries
- Program awareness/marketing products
- Guidelines for data collection/analysis that address both rural and suburban systems.
- Identification of funding resources that may be used by states to perform voluntary assessments of subrecipients’ implementation of the model program.
- Identification of information resources, such as websites developed by its Partners, on the elements of the model program and how those elements may be applied.
<table>
<thead>
<tr>
<th>Core Element</th>
<th>ITEMS</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>IS THERE AN APPROPRIATE PLAN OR POLICY DOCUMENT THAT ADDRESSES ALL CORE ELEMENTS?</td>
<td></td>
</tr>
<tr>
<td></td>
<td>IS THERE AN IDENTIFIED PERSON IN THE ORGANIZATION’S MANAGEMENT WHO HAS RESPONSIBILITY FOR THIS AREA IN HIS OR HER JOB DESCRIPTION, AND WHO POSSESES THE APPROPRIATE KNOWLEDGE, SKILLS AND ABILITIES TO OVERSEE ALL CORE ELEMENTS?</td>
<td></td>
</tr>
<tr>
<td></td>
<td>AT A MINIMUM, ARE ALL SAFETY SENSITIVE EMPLOYEES AND THEIR SUPERVISORS AWARE OF THE PLANS, POLICIES AND PROCEDURES IN ALL CORE ELEMENTS?</td>
<td></td>
</tr>
<tr>
<td></td>
<td>HAVE ALL THE APPROPRIATE EMPLOYEES BEEN TRAINED TO PROFICIENCY IN CARRYING OUT THEIR FUNCTIONS THAT FALL UNDER ALL CORE ELEMENTS?</td>
<td></td>
</tr>
<tr>
<td></td>
<td>ARE EMPLOYEES FOLLOWING THE PROCEDURES AND PROTOCOLS OF ALL CORE ELEMENTS ON A REGULAR AND CONSISTENT BASIS?</td>
<td></td>
</tr>
</tbody>
</table>

**Driver/Employee Selection**

1.1 ARE THERE WRITTEN JOB DESCRIPTIONS FOR DRIVERS AND OTHER SAFETY SENSITIVE PERSONNEL?

1.2 WHEN WERE THE JOB DESCRIPTIONS LAST REVIEWED?

1.3 DOES THE SYSTEM HAVE TROUBLE RECRUITING DRIVERS?

1.4 DOES THE SYSTEM ENGAGE IN SOME FORM OF “TARGETED RECRUITMENT” FOR DRIVERS?

1.5 WHAT TOOLS ARE USED TO INTERVIEW AND SELECT DRIVERS AND OTHER SAFETY SENSITIVE EMPLOYEES?

1.6 DOES THE RECRUITMENT AND SELECTION PROCESS HELP THE ORGANIZATION ATTRACT AND RETAIN A SUITABLY SKILLED, SAFETY CONSCIOUS WORKFORCE?

1.7 WHAT SYSTEMS ARE IN PLACE FOR MONITORING EMPLOYEES’ CURRENT EMPLOYMENT STATUS, LICENSES, CERTIFICATIONS, AND OTHER IMPORTANT QUALIFICATIONS?
<p>| <strong>1.8</strong> | WHAT ISSUES EXIST RELATIVE TO HIGH STAFF TURNOVER, SEASONAL EMPLOYMENT, OR PART TIME DRIVERS WITH MULTIPLE JOBS, AND HOW DOES THE AGENCY RESPOND TO THESE ISSUES? |
| <strong>1.9</strong> | ARE THERE FILE COPIES OF ADVERTISING, FLIERS, OR OTHER MECHANISMS THAT ARE USED FOR RECRUITING DRIVERS AND OTHER EMPLOYEES? |
| <strong>1.10</strong> | ARE THERE FILE COPIES OF STANDARD EMPLOYMENT APPLICATION FORMS, INTERVIEW QUESTIONNAIRES, OR OTHER MATERIALS USED AS AIDS IN THE SELECTION AND HIRING PROCESS? |
| <strong>1.11</strong> | ARE MAINTENANCE PERSONNEL QUALIFIED BY TRAINING OR EXPERIENCE? |
| <strong>2.1</strong> | IS THERE A SYSTEM IN PLACE TO EVALUATE PERFORMANCE? |
| <strong>2.2</strong> | DOES THE PERFORMANCE EVALUATION SYSTEM ASSESS TRAINING SUCCESS AND SAFETY-RELATED PERFORMANCE? |
| <strong>2.3</strong> | ARE CANDIDATE DRIVERS &quot;WASHING OUT&quot; OF THE TRAINING PROGRAMS ON A REGULAR BASIS? |
| <strong>2.4</strong> | WHAT IS CONTAINED IN THE TRAINING PROGRAM CURRENTLY IN PLACE FOR DRIVERS AND OTHER SAFETY SENSITIVE EMPLOYEES? |
| <strong>2.5</strong> | WHAT SCHEDULE IS IN PLACE FOR REFRESHER TRAINING COURSES? |
| <strong>2.6</strong> | WHAT PROCEDURES ARE IN PLACE TO DECIDE WHEN REMEDIAL TRAINING IS NECESSARY? |
| <strong>2.7</strong> | ARE THERE TRAINING CURRICULUMS, TRAINING SCHEDULES AND AUDIO MATERIALS IN PLACE TO SUPPORT ALL IN-HOUSE TRAINING EFFORTS? |
| <strong>2.8</strong> | IS THERE TRAINING THAT PROVIDES FOR ONE-ON-ONE COACHING OF EXPERIENCED VEHICLE OPERATORS BY OTHER PEER OPERATORS TO IMPROVE DRIVING SKILLS, ENSURE USE OF APPROPRIATE SAFETY EQUIPMENT AND SAFE PRACTICES, AND TO DEVELOP UNIFORMITY IN OPERATING PRACTICES AMONG DRIVERS, AND IS THIS TRAINING DOCUMENTED? |
| <strong>2.9</strong> | WHAT SORT OF RECORDS ARE KEPT ON THE TRAINING PROGRAM; IS THE ORGANIZATION ABLE TO TRACK WHICH PERSONNEL HAVE HAD WHICH TRAINING, HOW SUCCESSFULLY THEY WERE TRAINED, AND WHEN THEY ARE DUE FOR MORE TRAINING? |</p>
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.10 WHO DOES THE TRAINING? WHAT IS THEIR BACKGROUND OR QUALIFICATIONS, AND WHAT CRITERIA WERE USED TO SELECT THESE FIRMS OR INDIVIDUALS?</td>
<td></td>
</tr>
<tr>
<td>2.11 HOW DOES ON-THE-JOB EXPERIENCE FIT INTO THE TRAINING PROGRAM; ARE THERE ESTABLISHED STANDARDS FOR ON-THE-JOB (OJT), AND IS IT DOCUMENTED WHEN PERSONNEL HAVE SUCCESSFULLY MASTERED OJT-BASED EXPECTATIONS?</td>
<td></td>
</tr>
<tr>
<td>2.12 UNDER THE PERSONNEL POLICY, WHO IS HELD ACCOUNTABLE FOR THE SUCCESS OF THE TRAINING PROGRAM?</td>
<td></td>
</tr>
<tr>
<td>2.13 ARE THERE WRITTEN RECORDS OF ALL TRAINING CLASSES THAT HAVE BEEN GIVEN, WHICH INCLUDE TRAINING OBJECTIVES OR LESSON PLANS, TRAINERS’ NAMES AND QUALIFICATIONS, LENGTH OF TRAINING, TRAINING MODE (E.G., VIDEO, CLASSROOM, OJT), TYPES OF CERTIFICATIONS OR CREDENTIALS RESULTING FROM TRAINING CLASSES, AND SCHEDULES FOR REFRESHER OR FOLLOW-UP TRAINING?</td>
<td></td>
</tr>
<tr>
<td>2.14 ARE THERE RECORDS TO SHOW WHICH PERSONNEL HAVE BEEN TESTED, CERTIFIED, OR OTHERWISE DEMONSTRATED THEIR SUCCESSFUL COMPLETION OF SPECIFIC TRAINING CLASSES, AND DO THESE RECORDS MAKE IT POSSIBLE TO DETERMINE WHEN REFRESHER TRAINING SHOULD BE SCHEDULED, BASED UPON THE CERTIFYING BODY’S REQUIREMENTS OR RECOMMENDATIONS?</td>
<td></td>
</tr>
<tr>
<td>2.15 IS THERE TRAINING IN LOCAL GEOGRAPHY, TRANSIT ORGANIZATION ROUTE STRUCTURE, OR MAP-READING SKILLS, IN WHATEVER FASHION IS APPROPRIATE TO THE TYPES(S) OF SERVICE THE ORGANIZATION PROVIDES ITS CUSTOMERS?</td>
<td></td>
</tr>
<tr>
<td>2.16 IS THERE TRAINING THAT GIVES AN OVERVIEW OF THE ORGANIZATION’S OPERATIONS POLICIES AS THEY PERTAIN TO ALL STAFF OF THE ORGANIZATION?</td>
<td></td>
</tr>
<tr>
<td>2.17 IS THERE TRAINING ON CUSTOMER RELATIONS TECHNIQUES?</td>
<td></td>
</tr>
<tr>
<td>2.18 IS THERE TRAINING ON PASSENGER ASSISTANCE AND SENSITIVITY TECHNIQUES FOR SERVING OLDER AND DISABLED PASSENGERS?</td>
<td></td>
</tr>
<tr>
<td>2.19 IS THERE TRAINING ON EVACUATION OF PASSENGERS, INCLUDING ELDERS AND PERSONS WITH DISABILITIES, FROM TRANSIT VEHICLES (INCLUDING SIMULATIONS)?</td>
<td></td>
</tr>
<tr>
<td>2.20</td>
<td>IS THERE TRAINING ON FIRE/LIFE SAFETY RESPONSE TECHNIQUES AND EQUIPMENT USE (INCLUDING SIMULATION EXERCISES)?</td>
</tr>
<tr>
<td>2.21</td>
<td>IS THERE TRAINING ON ACCIDENT AND INCIDENT REPORTING PROCEDURES (INCLUDING MANAGEMENT ROLES AND RELEVANT CHECKLISTS)?</td>
</tr>
<tr>
<td>2.22</td>
<td>IS THERE TRAINING ON FIRST AID/CPR AND CERTIFICATION (IF LOCAL POLICIES SO DICTATE)?</td>
</tr>
<tr>
<td>2.23</td>
<td>IS THERE TRAINING ON BLOOD-BORNE PATHOGEN CONTROL PROCEDURES?</td>
</tr>
<tr>
<td>2.24</td>
<td>DO DRIVERS RECEIVE DEFENSIVE DRIVING TRAINING AND CERTIFICATION?</td>
</tr>
<tr>
<td>2.25</td>
<td>DO DRIVERS, DISPATCHERS AND SUPERVISORY STAFF RECEIVE TRAINING ON RADIO OR OTHER COMMUNICATIONS EQUIPMENT USE?</td>
</tr>
<tr>
<td>2.26</td>
<td>DO DRIVERS, DISPATCHERS AND SUPERVISORY STAFF RECEIVE TRAINING ON THE ROLE OF DRIVERS IN SCHEDULING AND DISPATCH FUNCTIONS?</td>
</tr>
<tr>
<td>2.27</td>
<td>DOES THE ORGANIZATION PROVIDE SAFETY MEETINGS AND INCENTIVES TO PROMOTE SAFETY AWARENESS AMONG THE DRIVERS AND OTHER SAFETY SENSITIVE PERSONNEL?</td>
</tr>
<tr>
<td>2.28</td>
<td>ARE DRIVERS TRAINED ON DRIVING IN WINTER OR OTHER INCLEMENT WEATHER AS APPROPRIATE TO THE ORGANIZATION'S CLIMATE AND LOCATION?</td>
</tr>
<tr>
<td>2.29</td>
<td>ARE DRIVERS TRAINED ON HANDLING BRAKE FAILURE AND TIRE BLOW OUT?</td>
</tr>
<tr>
<td>2.30</td>
<td>ARE DRIVERS TRAINED ON CROSSING RAILROAD TRACKS?</td>
</tr>
<tr>
<td>2.31</td>
<td>IS THERE CURRENT AND ONGOING TRAINING OF MAINTENANCE PERSONNEL IN THE USE OF SPECIALIZED TOOLS HEAVY EQUIPMENT OPERATION, ETC.?</td>
</tr>
</tbody>
</table>

### Safety Data Acquisition/Analysis

<p>| 3.1 | WHAT IS BEING DONE TO RAISE SAFETY AWARENESS AMONG DRIVERS AND OTHER PERSONNEL? |
| 3.2 | HOW DOES THE ORGANIZATION GO ABOUT DETERMINING WHETHER ACCIDENTS OR INCIDENTS ARE &quot;AVOIDABLE&quot; OR &quot;UNAVOIDABLE&quot;? |
| 3.3 | HAS THE ORGANIZATION HAD ANY INSURANCE-RELATED PROBLEMS DUE TO SAFETY AND TRAINING PROGRAMS (OR LACK OF)? |</p>
<table>
<thead>
<tr>
<th>3.4</th>
<th>ARE THERE REGULAR SAFETY MEETINGS?</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.5</td>
<td>WHAT SAFETY ISSUES ARISE OUTSIDE OF THE TRANSIT SETTING, SUCH AS IN THE OFFICE, THE GARAGE, OR THE MAINTENANCE AREA?</td>
</tr>
<tr>
<td>3.6</td>
<td>IS THE WORKPLACE CLEAN ORDERLY, AND SAFETY-CONSCIOUS?</td>
</tr>
<tr>
<td>3.7</td>
<td>DOES THE WRITTEN PERSONNEL POLICY DEFINE THE RELATIONSHIP BETWEEN SAFETY, PERFORMANCE AND PERFORMANCE-RELATED DISCIPLINE PROCEDURES?</td>
</tr>
<tr>
<td>3.8</td>
<td>DO THE WRITTEN JOB DESCRIPTIONS FOR DRIVERS AND OTHER SAFETY-SENSITIVE PERSONNEL ADDRESS SAFETY AND TRAINING EXPECTATIONS, AND DO THEY TIE INTO PERFORMANCE EVALUATIONS BASED UPON SAFETY COMPLIANCE AND TRAINING SUCCESS?</td>
</tr>
<tr>
<td>3.9</td>
<td>IS THERE A WRITTEN PLAN ADDRESSING RISK MANAGEMENT NEEDS OF THE ORGANIZATION, SAFETY REVIEWS AND ANALYSIS, ACCIDENT INVESTIGATION PROTOCOLS, DRUG AND ALCOHOL SCREENING AND PREVENTION AND SAFETY MEETINGS?</td>
</tr>
<tr>
<td>3.10</td>
<td>IS THERE DOCUMENTATION TO SHOW THAT THE PERFORMANCE EVALUATIONS DISCUSSED IN THE PERSONNEL POLICY ACTUALLY ARE CARRIED OUT AND ACTED ON?</td>
</tr>
<tr>
<td>3.11</td>
<td>IS THERE CURRENT DOCUMENTATION OF THE ORGANIZATIONAL STRUCTURE, AND A STRATEGIC PLAN THAT TIES TOGETHER SAFETY, SECURITY AND TRAINING, SERVICE POLICIES, AND THE ORGANIZATION'S VALUE OR MISSION STATEMENT?</td>
</tr>
<tr>
<td>3.12</td>
<td>DOES THE ORGANIZATION KEEP COPIES OF ALL AWARDS AND OTHER INCENTIVES THAT DRIVERS OR OTHER PERSONNEL RECEIVE THAT DOCUMENT THEIR TRAINING OR SAFETY ACCOMPLISHMENTS?</td>
</tr>
<tr>
<td>3.13</td>
<td>WHAT DOES THE ORGANIZATION DO TO ENSURE THAT DRIVERS SAFELY PROVIDE THE TRIPS OR DRIVE THE ROUTES ASSIGNED TO THEM?</td>
</tr>
<tr>
<td>3.14</td>
<td>WHAT LINES OF COMMUNICATION ALLOW THE DRIVERS AND OTHER KEY PEOPLE TO KNOW ABOUT SAFETY-RELATED ISSUES THAT ARISE DURING THE COURSE OF A DAY’S BUSINESS?</td>
</tr>
<tr>
<td>3.15</td>
<td>IF A DRIVER IS HAVING A SAFETY-RELATED PROBLEM WHILE IN SERVICE, WHAT IS MANAGEMENT’S ROLE, AND HOW DOES MANAGEMENT RESPOND?</td>
</tr>
<tr>
<td>3.16</td>
<td>WHEN DRIVERS SEE A SAFETY-RELATED PROBLEM DO THEY REPORT IT?</td>
</tr>
<tr>
<td>------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>3.17</td>
<td>WHAT IS THE STANDARD PROCEDURE WHEN DRIVERS REPORT SAFETY-RELATED PROBLEMS WITH THEIR VEHICLES?</td>
</tr>
<tr>
<td>3.18</td>
<td>DOES THE ORGANIZATION PROVIDE SAFETY MEETINGS AND INCENTIVES TO PROMOTE SAFETY AWARENESS AMONG THE DRIVERS?</td>
</tr>
<tr>
<td>3.19</td>
<td>ARE ALL VEHICLES EQUIPPED WITH TRIANGLES, A FIRE EXTINGUISHER, A WEB CUTTER, A FIRST AID KIT AND BLOOD-BORNE PATHOGEN KIT?</td>
</tr>
<tr>
<td>3.20</td>
<td>IS THERE A PROCESS IN PLACE FOR ENSURING OFFICE SAFETY FOR ADMINISTRATIVE STAFF?</td>
</tr>
<tr>
<td>3.21</td>
<td>IS THERE A PROGRAM FOR ENSURING SHOP SAFETY FOR MAINTENANCE EMPLOYEES?</td>
</tr>
<tr>
<td>3.22</td>
<td>DOES THE SYSTEM HAVE DOCUMENTED COMPLIANCE WITH PERTINENT OSHA STANDARDS?</td>
</tr>
<tr>
<td>3.23</td>
<td>DO INCIDENT REPORTS INDICATE ANY TRENDS IN THE NUMBER OF ACCIDENTS ON PASSENGER VEHICLES?</td>
</tr>
<tr>
<td>3.24</td>
<td>DOES THE SYSTEM RECORD VANDALISM TO VEHICLES, FACILITIES, STOPS, AND OTHER PROPERTY?</td>
</tr>
<tr>
<td>3.25</td>
<td>ARE MONTHLY AND ANNUAL TOTALS FOR ACCIDENTS AND INCIDENTS, VANDALISM, AND CRIMES COMPILED AND MONITORED OVER TIME?</td>
</tr>
<tr>
<td>3.26</td>
<td>ARE PASSENGER COMPLAINTS RELATED TO SAFETY AND SECURITY TRACKED?</td>
</tr>
<tr>
<td>3.27</td>
<td>HAS THE TRANSIT AGENCY ADOPTED AN EXPOSURE CONTROL PLAN THAT ELIMINATES OR MINIMIZES EMPLOYEES’ EXPOSURE TO BLOOD-BORNE PATHOGENS CONSISTENT WITH OSHA 1920.1030?</td>
</tr>
<tr>
<td>3.28</td>
<td>DOES THE TRANSIT AGENCY HAVE A RISK MANAGEMENT PLAN THAT IDENTIFIES, ANALYZES AND MEASURES SPECIFIC RISKS THE AGENCY MAY FACE AND ADAPTS METHODOLOGIES TO AVOID, REDUCE, CONTROL, ASSUME OR TRANSFER THESE SPECIFIC RISKS?</td>
</tr>
<tr>
<td>3.29</td>
<td>DO THE TRANSIT SYSTEM’S FACILITIES HAVE A BUILDING EVACUATION PLAN, IS IT POSTED AND ARE EXITS CLEARLY MARKED?</td>
</tr>
</tbody>
</table>

*Drug and Alcohol Abuse Programs*
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1</td>
<td>ADDRESSED DURING THE DESK REVIEW, SINCE THE COMMUNITY TRANSPORTATION SECTION OVERSEES THE DRUG AND ALCOHOL TESTING REGULATION PROGRAM COMPLIANCE.</td>
</tr>
<tr>
<td>5.1</td>
<td>ARE ROUTINE MAINTENANCE FUNCTIONS PERFORMED IN-HOUSE OR UNDER CONTRACT?</td>
</tr>
<tr>
<td>5.2</td>
<td>ARE THE TRANSIT VEHICLES CLEAN AND THE OUTWARD APPEARANCE ONE THAT REFLECTS THE ORGANIZATION’S COMMITMENT TO THE SAFETY AND SECURITY OF ITS PASSENGERS AND CUSTOMERS?</td>
</tr>
<tr>
<td>5.3</td>
<td>ARE THERE LINES OF COMMUNICATION THAT ALLOW MAINTENANCE PERSONNEL AND DRIVERS TO SHARE THEIR EXPERTISE IN MAINTAINING THE OPERATIONAL SAFETY OF THE VEHICLE FLEET?</td>
</tr>
<tr>
<td>5.4</td>
<td>DO DRIVERS ALWAYS PERFORM EFFECTIVE PRE- AND POST-TRIP INSPECTIONS?</td>
</tr>
<tr>
<td>5.5</td>
<td>DO DRIVERS EFFECTIVELY LIVE UP TO THEIR VEHICLE MAINTENANCE AND DEFECT REPORTING RESPONSIBILITIES?</td>
</tr>
<tr>
<td>5.6</td>
<td>ARE THERE INDICATIONS OF POSSIBLE SHORTCOMINGS IN THE MAINTENANCE PROGRAM, SUCH AS FREQUENT OIL LEAKS, ENGINES THAT SMOKE EXCESSIVELY, SIGNS OF LEAKING EXHAUST GASES, FLUIDS THAT MUST BE REPLENISHED MORE FREQUENTLY THAN MANUFACTURERS SUGGEST?</td>
</tr>
<tr>
<td>5.7</td>
<td>ARE WHEELCHAIR LIFTS, SECUREMENT DEVICES AND OTHER ACCESSIBILITY FEATURES OF THE TRANSIT VEHICLES TESTED ON A DAILY BASIS, AND DOES THE ORGANIZATION ENSURE THERE ARE NO RECURRING PATTERNS OF LIFT FAILURES OR RELATED PROBLEMS?</td>
</tr>
<tr>
<td>5.8</td>
<td>IS THERE A WRITTEN STATEMENT OF POLICY GOVERNING MAINTENANCE THAT IS APPROPRIATE TO THE ORGANIZATION AND ITS TRANSIT OPERATIONS?</td>
</tr>
<tr>
<td>5.9</td>
<td>IS THERE A MAINTENANCE PLAN CONSISTENT WITH MAINTENANCE POLICY?</td>
</tr>
<tr>
<td>5.10</td>
<td>DOES THE PLAN AT LEAST MEET THE MINIMUM MAINTENANCE RECOMMENDATIONS OF THE MANUFACTURER?</td>
</tr>
<tr>
<td>5.11</td>
<td>IS ALL WORK REQUIRED BY MANUFACTURER’S WARRANTY PROVISIONS BEING PERFORMED?</td>
</tr>
<tr>
<td>5.12</td>
<td>ARE WARRANTY CLAIMS, IF ANY, PURSUED EFFECTIVELY AND PROMPTLY TO CONCLUSION?</td>
</tr>
<tr>
<td>5.13</td>
<td>ARE PREVENTIVE MAINTENANCE ENTRIES BEING MADE IN APPROPRIATE FILES AND ARE THEY CONDUCTED AT THE REQUIRED MILEAGE?</td>
</tr>
<tr>
<td>5.14</td>
<td>ARE PREVENTIVE MAINTENANCE LOGS COMPLETED IN A TIMELY AND ACCURATE FASHION?</td>
</tr>
<tr>
<td>5.15</td>
<td>ARE ADDITIONAL MAINTENANCE ANALYSES BEING PERFORMED, E.G., PERIODIC ENGINE OIL ANALYSES?</td>
</tr>
<tr>
<td>5.16</td>
<td>ARE DEFICIENCIES NOTED IN PRE-TRIP INSPECTIONS REPAIRED IN A TIMELY MANNER AND PROPERLY REVIEWED BY MANAGEMENT?</td>
</tr>
<tr>
<td>5.17</td>
<td>DO MAINTENANCE PERSONNEL PERIODICALLY INSPECT VEHICLES’ DEFECTS?</td>
</tr>
<tr>
<td>5.18</td>
<td>IS THERE PROTECTION ON OR AROUND IN-GROUND MAINTENANCE PITS?</td>
</tr>
<tr>
<td>5.19</td>
<td>ARE THERE APPROVED JACK STANDS UNDER VEHICLES ON LIFTS?</td>
</tr>
<tr>
<td>5.20</td>
<td>ARE APPROPRIATE PROCEDURES IN PLACE TO DEAL WITH THE HANDLING, STORAGE AND DISPOSAL OF HAZARDOUS, TOXIC AND POLLUTING SUBSTANCES?</td>
</tr>
<tr>
<td>5.21</td>
<td>IS THE MAINTENANCE SHOP EQUIPPED WITH SAFETY GOGGLES, EYE WASH STATIONS, FIRST AID KITS AND BLOOD-BORNE PATHOGEN KITS?</td>
</tr>
<tr>
<td>5.22</td>
<td>ARE “NON-WALK THROUGH” AREAS, INCLUDING OUTSIDE GARAGE DOORS, CLEARLY MARKED?</td>
</tr>
<tr>
<td>5.23</td>
<td>ARE PARTS APPROPRIATELY AND SAFELY STORED SO THEY CAN BE EASILY INVENTORIZED AND DO NOT PRESENT A DANGER TO EMPLOYEES?</td>
</tr>
<tr>
<td>5.24</td>
<td>ARE ELECTRICAL POWER SOURCES SECURED AND ELECTRICAL CORDS STORED WHEN NOT IN USE?</td>
</tr>
</tbody>
</table>

<p>| 6.1 | DOES THE TRANSIT SYSTEM HAVE A SYSTEM SECURITY PLAN, APPROPRIATE TO THE SIZE, LOCATION AND SCOPE OF ITS OPERATIONS, IN PLACE? |
| 6.2 | IS THERE A POLICY STATEMENT EMPHASIZING THE IMPORTANCE OF THE SECURITY PLAN? |
| 6.3 | IS THE SECURITY PLAN APPROVED AND SIGNED BY THE TOP OFFICIAL? |
| 6.4 | ARE SECURITY PLANS DISTRIBUTED TO APPROPRIATE TRANSIT AGENCY STAFF? |
| 6.5 | DO SECURITY AWARENESS BRIEFINGS TAKE PLACE FOR ALL EMPLOYEES? |
| 6.6 | IS FACILITY AND VEHICLE SECURITY ESTABLISHED AT THE HIGHEST PRACTICAL LEVEL AND MONITORED ON A REGULAR BASIS? |
| 6.7 | ARE SECURITY RESPONSIBILITIES DEFINED AND DELEGATED FROM MANAGEMENT TO THE FRONT LINE EMPLOYEES? |
| 6.8 | IS A PROCESS IN PLACE TO IDENTIFY SECURITY PROBLEMS AND RESOLVE SECURITY VULNERABILITIES AS THEY MAY DEVELOP? |
| 6.9 | ARE ID BADGES USED TO CONTROL ACCESS TO SECURE TRANSIT AREAS INCLUDING VEHICLE OPERATION? |
| 6.10 | ARE CAMERAS USED TO MONITOR FACILITIES AND/OR TRANSIT VEHICLES? |
| 6.11 | IS THERE ADEQUATE LIGHTING FOR THE FACILITY GROUNDS? |
| 6.12 | IS THERE A FENCE OR SIMILAR BARRIER AROUND THE PERIMETER OF THE FACILITY AND VEHICLE STORAGE AREA? |
| 6.13 | HAVE EMPLOYEES BEEN BRIEFED ON AND DO THEY UNDERSTAND WHAT THEY ARE TO REPORT AND WHO THEY ARE TO REPORT IT TO IN TERMS OF SUSPICIOUS PEOPLE, ACTIVITIES, PACKAGES, DEVICES, SUBSTANCES OR VEHICLES? |
| 6.14 | DO EMPLOYEES KNOW HOW TO REACT TO BEST PROTECT THEMSELVES AND THEIR PASSENGERS IN THE CASE OF AN INCIDENT INVOLVING A POTENTIAL IMPROVISED EXPLOSIVE DEVICE OR SUSPICIOUS PACKAGE OR POTENTIAL CHEMICAL, BIOLOGICAL OR RADIOLOGICAL WEAPONS OR ACCIDENTAL RELEASES? |
| 6.15 | HAVE MANAGERS AND SUPERVISORS BEEN TRAINED IN SECURITY INCIDENT MANAGEMENT? |
| 6.16 | IS THERE A PROCEDURE IN PLACE TO RESPOND TO BOMB THREATS AND OTHER TYPES OF THREATS INCLUDING THREAT EVALUATION, SEARCH PROCEDURE, EVACUATION PROCEDURE AND CONTACTING APPROPRIATE AUTHORITIES? |
| 6.17 | WHAT ARE THE SAFETY AND EMERGENCY RESPONSE PROCEDURE POLICIES, AND WHAT STEPS ARE TAKEN TO ENSURE THAT ALL PERSONNEL ARE GOING TO FOLLOW THESE PROCEDURES? |
| 6.18 | WHAT IS THE POLICY ON RESPONDING TO THE TYPES OF PASSENGER, VEHICLE OR TRAFFIC EMERGENCIES THAT CAN OCCUR IN ROUTINE DAILY BUSINESS (INCLUDING SIMULATION)? |
| 6.19 | WHAT ACTIONS ARE TAKEN TO PROVIDE FOR PREPAREDNESS FOR SERIOUS ACCIDENTS, DISASTER SITUATIONS OR OTHER CRITICAL EMERGENCIES (INCLUDING DISASTER DRILLS)? |
| 6.20 | HOW DOES THE ORGANIZATION'S MANAGEMENT SHOW AN APPROPRIATE DEGREE OF SUPPORTIVENESS FOR DRIVERS WHEN EMERGENCY SITUATIONS OCCUR? |</p>
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.21 IS LAW ENFORCEMENT AND EMERGENCY RESPONSE PERSONNEL REGULARLY INFORMED OF PLANNED CHANGES TO SYSTEM FACILITIES, OPERATIONS, ETC., SO THAT THEY MAY RESPOND QUICKLY TO EMERGENCIES?</td>
<td></td>
</tr>
<tr>
<td>6.22 HAVE MOCK TRAINING EXERCISES IN COOPERATION WITH LAW ENFORCEMENT AND EMERGENCY SERVICE PERSONNEL BEEN DEVELOPED AND CONDUCTED?</td>
<td></td>
</tr>
<tr>
<td>6.23 DOES THE AGENCY HAVE AN EMERGENCY MANAGEMENT PLAN, APPROPRIATE TO THE SIZE, LOCATION AND SCOPE OF ITS OPERATIONS, THAT IS INTEGRATED WITH REGIONAL EMERGENCY MANAGEMENT PLANS?</td>
<td></td>
</tr>
<tr>
<td>6.24 ARE MUTUAL AID AGREEMENTS IN PLACE WITH OTHER REGIONAL PUBLIC AGENCIES, SUCH AS LOCAL GOVERNMENT, FIRE AND POLICE IN ORDER TO FACILITATE COORDINATED REACTION TO NATURAL DISASTERS, FIRES ACCIDENTAL CHEMICAL RELEASES, ACTS OF VIOLENCE OR TERRORISM AND OTHER EMERGENCIES THAT MIGHT OCCUR?</td>
<td></td>
</tr>
<tr>
<td>6.25 DOES EACH TRANSIT AGENCY MANAGER AND STAFF MEMBER UNDERSTAND THEIR ROLES AND RESPONSIBILITIES IN REACTING TO THE VARIOUS KINDS OF EMERGENCIES THAT COULD OCCUR?</td>
<td></td>
</tr>
</tbody>
</table>

In signing this document, I declare that the foregoing information, and any other statement made by me on behalf of the transit system is true and correct.

__________________________
Name/Title of Transit System Representative

__________________________
Signature