



EL PASO
TRANSPORTATION
AUTHORITY

Public Transportation Agency Safety Plan



February 2026

Executive Summary

In December 2020, El Paso County created the El Paso Area Transportation Services, LGC, also known as the El Paso Transportation Authority (ETA).

ETA provides public transportation services throughout El Paso County, outside of the Cities of El Paso and Socorro. ETA operates the following services:

- ETA paseo – six (6) intercity fixed routes connecting cities, towns and villages to El Paso.
- ETA access – complementary Americans with Disabilities Act (ADA) paratransit operating within a $\frac{3}{4}$ mile radius of ETA paseo routes.
- ETA ándale – on demand microtransit service in San Elizario and Clint.
- Vamanos vanpool – commuter vanpool subsidy program for trips originating in El Paso County.
- New Mexico Department of Transportation (NMDOT) Park & Ride – intercity service connecting El Paso with Las Cruces, New Mexico.

The fleet consists of 26 compressed natural gas (CNG) fixed route vehicles and 10 gasoline paratransit vans. In FY 2025, ETA is projected to carry 572,802 for all modes. Transdev is the contractor for ETA paseo, ETA access and ETA ándale with a contract end date of September 30, 2030. Enterprise Mobility is the contractor for Vamanos with a contract end date of December 31, 2026 and ETA has an intergovernmental agreement with NMDOT for the NMDOT Park & Ride Gold Route who contracts with All Aboard America.

ETA is committed to comprehensive safety planning. As an operator of a public transportation system that receives Federal financial assistance under Title 49 of the United States Code (USC) Chapter 53, ETA is subject to 49 CFR Parts 625, 630, 670, 673. This Safety Plan is fully compliant with that Rule as well as with the requirements of the National Public Transportation Safety Plan (NSTP) as promulgated through 49 CFR 670.

Safety Policy

ETA and the Federal Transit Administration (FTA) have adopted the principles and methods of System Safety and of Safety Management Systems (SMS) as the basis for enhancing the safety of public transportation. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

The ETA Public Transportation Agency Safety Plan, hereafter referred to as the Agency Safety Plan (ASP), is an agency-wide safety plan that meets and is responsive to FTA's Public Transportation Agency Safety Program (PTASP). The ASP reflects the specific safety objectives, standards, and priorities of ETA. ETA has integrated its System Safety compliance with SMS principles and methods, customizing them to fit the size, complexity, and scope of its public transportation system as well as the environment in which it operates.

Safety Plan

ETA's ASP meets or exceeds the General Requirements of 49 CFR Part 625, 630, 670, 673, including the following required elements:

- The ASP, and subsequent updates, will be signed by the Accountable Executive - ETA's Executive Director and approved by the ETA Board of Directors.
- ETA's Transit Planner and Contractor Safety & Training Manager will serve as the agency's Chief Safety Officer. This position reports directly to the ETA Executive Director.
- The ASP documents the processes and activities related to SMS implementation.
- The ASP includes performance targets based on the safety performance criteria established under the NPTSP, and the state of good repair standards established in the regulations that implement the National Transit Asset Management (TAM) System and are included in the NPTSP.
- The ASP addresses all applicable requirements and standards as set forth in the NPTSP.
- The ASP will comply with the minimum safety performance standards authorized through the NPTSP.
- ETA will establish a process and timeline for conducting an annual review and update of the ASP.
- The ASP includes bus and demand response modes of service. ETA will maintain the ASP per the recordkeeping requirements in subpart D of Part 673.
- The ASP is consistent with Centers for Disease Control and Prevention and State health authority guidelines to minimize exposure to infectious diseases.
- ETA has composed a Safety Committee made up of frontline representatives to assist with the development of the ASP.

- The ASP includes a risk reduction program for transit operations to improve safety by reducing the number of accidents, injuries, and assaults on transit workers based on data submitted to the National Transit Database (NTD).
- The ASP will set risk reduction performance targets using the previous year of the data submitted to NTD. ETA's first year of operation is September 1, 2025. ETA will set risk reduction performance targets as required based on each year of service.

Certification of Compliance

On an annual basis, ETA will certify through Board Minutes that it has established this ASP and, by such action, will meet the requirements of Part 673.

Coordination with Planning Processes

To aid in the planning process, ETA will make its safety performance targets available to the Department of Transportation and the El Paso Metropolitan Planning Organization (El Paso MPO), the region's Metropolitan Planning Organization (MPO).

Transit Agency Information

Transit Agency Name	El Paso Area Transportation Services, LGC
Transit Agency Address	800 East Overland Avenue, Room 423, El Paso, TX 79901
Name and Title of Accountable Executive	John Andoh, Executive Director
Name of Chief Safety Officer or SMS Executive	• Jesus Cerna, Transit Planner • Marco Rosales, Safety Trainer
Mode(s) of Service Covered by This Plan	• Fixed Route • Americans with Disabilities Act (ADA) Paratransit • Microtransit • Vanpool • Commuter Bus
List All FTA Funding Types (e.g., 5307, 5310, 5311)	• 5307 • 5311 • 5339 • 5310
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	ETA operates the following transit services as contracted service: • ETA paseo – six (6) intercity fixed routes connecting cities, towns and villages to El Paso. • ETA access – complementary Americans with Disabilities Act (ADA) paratransit operating within a $\frac{3}{4}$ mile radius of ETA paseo routes. • ETA ándale – on demand microtransit service in San Elizario and Clint. • Vamanos vanpool – commuter vanpool subsidy program for trips originating in El Paso County. • New Mexico Department of Transportation (NMDOT) Park & Ride – intercity service connecting El Paso with Las Cruces, New Mexico.
Description of Contracted Services	• ETA provides the transit services above through its contractor, Transdev North America, Inc.
Name and Address of Transit Agency(s) for Which Service is Provided	• El Paso Area Transportation Services, LGC 800 East Overland Avenue, Room 423, El Paso, TX 79901

Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	El Paso Area Transportation Services, LGC	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
		3/1/2026
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	El Paso Area Transportation Services, LGC	2/27/2026
	Relevant Documentation (Title and Location)	
	El Paso Area Transportation Services, LGC Board Minutes	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification
	El Paso Area Transportation Services, LGC	2/27/2026
	Relevant Documentation (Title and Location)	
	El Paso Area Transportation Services, LGC Board Minutes	

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
Annual Review and Update of the Public Transportation Agency Safety Plan			
<i>Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.</i>			
The ETA PTASP is reviewed and finalized in November of each calendar year. The plan will be reviewed by the Agency Safety Plan Committee, which was formed for this purpose			

Safety Performance Targets

The Safety Performance Targets conform to the National Public Transportation Safety Plan as of the April 2024 update. This update was applicable for the FY 2024/25 fiscal year forward. Data contained in this report is aligned with the FTA requirements outlined in the National Public Transportation Safety Plan. On the following page, Table 1 is compliant with the National Public Transportation Safety Plan (NPTSP) and with the National Transit Database (NTD) reporting requirements. The Safety Performance Target Measures for FY2025/2026 are as follows:

Table 1: FY2024/2025 Safety Performance Measures

Safety Performance Measure	Total Events	Event Rate (Total/100kVRM)
Major Events	0	
Collisions	6	16,666.67
Pedestrian Collisions	0	
Vehicular Collisions	3	33,333.33
Fatalities	0	
Transit Worker Fatalities	0	
Injuries	1	100,000
Transit Worker Injuries	2	50,000
Assaults on Transit Workers	0	
Annual Vehicle Revenue Miles (VRM)	6,195,374	

After reviewing the performance in FY 2024/25, ETA set goals to ensure that ETA and its contractors are providing safe service to the employees and passengers.

Table 2. FY 2025/26 Safety Performance Target Metrics

Safety Performance Measure	FY 26 Goal	FY 25 Events
Major Events	6	0
Collisions	6	6
Pedestrian Collisions	0	0
Vehicular Collisions	6	3
Fatalities	0	0
Transit Worker Fatalities	0	0
Injuries	6	1
Transit Worker Injuries	6	2
Assaults on Transit Workers	0	0

Communication of ETA safety performance is disseminated via email, memos, board reports, in-service training, and safety boards.

FTA requires that ETA coordinate with FTA Region 6 and the El Paso MPO, the region's MPO. ETA provides El Paso MPO with the information in the table above as part of the annual reporting.

Safety Management Policy

It is ETA's policy to provide safe and reliable transportation services for the general public and individuals with disabilities, to maintain safe and healthy working conditions for our employees, and to comply with all applicable occupational and environmental laws and regulations.

Operational and safety training, accident investigations, Standard Operating Procedures (SOPs), and audit/inspection programs are documented and referenced in the ASP (Accident Safety Plan). This plan aims to identify and address unsafe acts and conditions, promote safety awareness, and help prevent injuries, illnesses, and environmental harm.

All ETA employees and any outside contractors working with ETA must adhere to the ASP. They are expected to recognize, report, and correct hazards, work safely, promote safety awareness, and actively assist in preventing accidents.

ETA is committed to comprehensive safety planning, and as an operator of a public transportation system that receives Federal financial assistance under Title 49 USC Chapter 53, it also complies with 49 CFR Part 673.

ETA has adopted the principles and methods of SMS as the basis for enhancing the safety of public transportation. All rules, regulations, policies, guidance, best practices, and technical assistance administered will, to the extent practical and consistent with legal and other applicable requirements, follow the principles and methods of SMS.

Safety Management Policy Statement

At ETA, safety is our credo — our core belief, our deepest conviction, and our highest priority. Our responsibility and accountability for safety extend to all ETA employees and contractors as we care for our customers, passengers, the general public, including motorists, cyclists, pedestrians, and one another.

Operational safety shall always serve as the guiding principle and paramount priority when developing any ETA operational policies, practices, and procedures. All decisions need to be viewed through the lens of safety.

The prevention of accidents, injuries, unsafe incidents, and illness is the responsibility of every ETA employee. All employees, from the Executive Director to the frontline employee, are expected to lead by example and:

- Provide a safe and healthy working environment
- Abide by all safety policies, rules, and regulations
- Expect and insist upon a total commitment to safety from fellow employees

- Immediately report any safety concerns to their supervisor or safety representative

ETA is committed to:

Executive Management Commitment to Safety

The Executive Director will lead the development of an organizational culture that promotes safe operations and provides the necessary resources to support this core management function. This will be achieved by fostering and ensuring safe practices, improving safety when needed, and encouraging effective employee safety reporting and communication. ETA will hold executives, managers, contractors, and employees accountable for safety performance.

Communication & Training:

Employee engagement is crucial to the functioning of an SMS. Communication systems will be implemented to enhance awareness of ETA's safety objectives and performance targets, as well as to facilitate ongoing safety communication throughout the organization. All levels of management must proactively engage employees and work to maintain honest and open lines of communication. All employees will be made aware of the importance of ETA's SMS and trained in safety reporting procedures. Communication protocols include:

- Training in SMS for all employees
- Notices to all contracted personnel
- E-mails to all ETA administrative staff
- Signed receipt from all employees and new hires
- Inclusion in employee Safety Briefings
- Posting on all general bulletin boards

The ASP will always be available to all employees. It will be maintained in an accessible electronic file by all key SMS personnel. Contractors will be directed to distribute a copy to each employee and future employees while in training and have a signature of receipt from employees documented and kept on file.

Responsibility & Accountability:

All levels of management will be responsible for delivering safe and quality transit services that represent ETA's performance of its SMS. Managers will take an active role in the Safety Risk Management process and ensure that Safety Assurance functions are supported. Managers are responsible for ensuring that Safety Risk Management is being performed in their operational areas of control to ensure that the safety risk associated with safety hazards is assessed and mitigated. Safety performance will be an

important part of performance evaluations for ETA.

Responsibility of Employees & Contractors:

All employees and contractors will support safety management by ensuring that hazards are identified and reported.

Employee Reporting: Executive management will establish a Safety Committee as a viable mechanism for employees to voice their safety concerns. All frontline employees will be responsible for utilizing this program as part of the SMS. No action will be taken against any employee who communicates a safety condition through the ETA safety reporting program unless such disclosure indicates the following: an illegal act, gross misconduct or negligence, or a deliberate or willful disregard of ETA rules, policies, and procedures.

Performance Monitoring and Measurement: ETA will establish realistic measures of safety performance and set safety performance targets to ensure continual improvement in safety. Managers will verify that the safety risk mitigations implemented are appropriate and effective.

Review & Evaluation: ETA will measure SMS performance by analyzing key safety performance indicators, reviewing inspections, investigations, and corrective action reports, as well as auditing the processes that support the SMS. These activities will become the basis for revising or developing safety objectives, safety performance targets, and plans with the goal of continuous safety improvement.



John C. Andoh III
Executive Director

February 27, 2026
Date

Safety Risk Management

The Safety Risk Management (SRM) objective is to identify hazardous conditions and/or behaviors, document them, develop and apply mitigation strategies, and assess if they can be eliminated or minimized to an acceptable risk status.

Safety Hazard Identification

ETA defines a hazard as any real or potential condition or behavior that can cause injury, illness, or death, damage or loss of facilities, equipment, rolling stock, or infrastructure of a transit system, or damage to the environment. The Chief Safety Officer is directly responsible for implementing and managing the Safety Hazard Identification on an ongoing basis. This includes:

- Identifying hazards and consequences of hazards;
- Developing, updating, and auditing the program;
- Training all designated transit employees and contractors on the hazards management process;
- Documenting and tracking all identified hazards up to resolution, and
- Communicating hazards to the Executive Director through written and verbal communications.

Hazard identification encompasses a set of methodologies that first searches throughout the system for anything with the potential to do harm. Identification of hazards is the responsibility of all divisions and is the key to system safety. Identified hazards are analyzed for severity, occurrence frequency, and cost feasibility of remedial action required to eliminate or reduce the hazard to the lowest practical level. All identified hazards will be reported immediately to the Chief Safety Officer for review and assessment of potential consequences.

Hazards can be identified in several ways, such as:

- Design Review
- Daily walk-throughs of facilities
- Monthly facility self-inspections
- Onboard in-cab cameras (e.g.: Event Vehicle Recorders)
- Accidents, Incidents, and System Reliability, and Failure Reports
- Ride Checks and Proficiency Checks

- System Inspections, Audits, and Regulatory Inspections
- Customer, Contractor, and Employee Complaints
- Safety Committee
- Employee Safety Reporting

Consequences of Safety Hazards are vetted through the Safety Risk Assessment and Safety Risk Mitigation procedures.

Safety Risk Assessment

ETA will use a hazard identification and analysis process before purchasing and accepting new equipment and/or modifications of existing facilities, systems, or rolling stock, and infrastructure elements. FTA Directive 24-1 requires ALL Transit Agencies to conduct a Risk Assessment to mitigate the occurrence of Assaults on Transit Workers and report to FTA by 12/26/2024. Since ETA did not exist prior to the directive, this was not submitted.

Safety Hazard Analysis Methods

Analysis of a hazard is based on both the probability of occurrence and the severity of an event. Hazards with the greatest potential to cause serious injury will take the highest priority for immediate resolution. Hazard analysis also attempts to reduce the severity of events by introducing protective devices and equipment, procedures, and/or forms, or system modifications that reduce the amount of human and property damage resulting from an accident.

While identifying every hazard is virtually impossible, there are two methods for orderly identification of hazards: inductive and deductive analysis.

- **The inductive hazard identification process** consists of an analysis of system components to identify their respective failure modes and the effects they may have on the total system. This process assumes the failure of single elements or events and, through analysis, determines the potential consequential effects on the system or subsystem.
- **The deductive hazard identification process** involves defining an undesired effect (e.g., collision, fire) and then deducing the possible conditions or system component faults (or combinations of them) necessary to cause the undesired effect.

The Chief Safety Officer will continually evaluate the project using the methods described above to identify new hazards. This will be documented as described in the PTASP document. In addition, the Chief Safety Officer utilizes a variety of software and

technologies (e.g., Incident database, data visualization software) to assist in his/her analysis efforts.

Hazard Risk Assessment

Hazard Risk Assessment is a quantitative calculation based largely on subjective judgments used to determine the risk associated with each hazard and, thus, the urgency for implementing corrective measures to eliminate or reduce risks to a level of acceptability. Hazard Risk Assessment is comprised of evaluating hazard severity (categorizing the hazard) and evaluating hazard probability. The factors considered in this analysis include system safety, schedule, and the impact on the public's perception of safety on the system in the community where the system operates.

Hazard Severity

Hazard severity is a subjective determination. As data is accumulated over time, an objective determination applicable specifically to ETA can be derived. The determination reflects a credible mishap that could be anticipated to result from human error, procedural deficiencies, design inadequacies, component failure, or malfunction. Hazard Severity is based on the U.S. Department of Defense Military Standard for Systems Engineering (MIL-STD-882-E) as follows:

Table 3: Definition of Severity Categories

SEVERITY CATEGORIES		
Description	Severity Category	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 \$10 Million.
Critical	2	Could result in one or more of the following: Permanent or 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 \$10 Million
Marginal	3	Could result in one or more of the following: Injury or occupational illness resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100K but less than \$1 Million.
Negligible	4	Could result in one or more of the following: Injury or occupational illness not resulting in a lost workday, minimal environmental impact, or monetary loss less than \$100K.

The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle that not all hazards pose an equal amount of risk to personal or system safety. During the performance of hazard analyses, ETA will identify any Category 1 Catastrophic and Category 2 Critical hazards. These hazards will be addressed immediately.

Hazard Probability

The probability of an event or hazard occurring may be defined as a ratio of the number of times a specific event occurs to the total number of trials in which this event may occur during the planned life expectancy of a system. Generally, hazard probability is described qualitatively in potential occurrences per units of time, miles, trips/runs, or passengers carried. Table 4 identifies the probability thresholds used by the ETA for hazard assessment. A hazard probability may be derived from the analysis of transit system operating experience, evaluation of safety data, or from historical safety data from other passenger bus systems and/or demand response.

Table 4: Probability Thresholds

PROBABILITY THRESHOLDS			
Description	Level	Specific Individual Item	Fleet or 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

Table 5: Risk Assessment Value

RISK ASSESSMENT MATRIX				
SEVERITY PROBABILITY	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (F)	Eliminated			

Safety Risk Mitigation

Safety Risk Mitigation can be applied throughout the five phases of the system life cycle, which are:

- Planning
- Design
- Construction
- Operations
- Decommissioning

Safety risk analysis attempts to determine the set of primary events in the hazard generation process. Upon identification of these events, ETA will undertake measures to mitigate, control, or eliminate the generation of hazards in ways that can reduce their risk to an acceptable level. Hazard resolution is the corrective action taken in response to the hazard identification and assessment process, but time and resource restrictions may determine the level of resolution that can be accomplished.

The following are actions addressed in hazard resolution:

- Eliminate the hazard, if possible;
- Implement training, procedural strategies, or technology approaches, as appropriate, to reduce the hazard; and
- Provide training to educate the workforce on possible hazards

Resolution of hazards utilizes the results of the Risk Assessment Process. The objectives of the hazard resolution process are to:

- Identify areas where hazard resolution requires a change in the system design, installation of safety devices, or development of special procedures;
- Verify hazards involving interfaces between two or more systems have been resolved; and
- Verify that the resolution of a hazard in one system does not create a new hazard in another system.

The following methodology to ensure system safety and security objectives to eliminate or control hazards. These controls are implemented throughout design, construction, procurement, and operations:

- Design out hazards or design to minimize hazard severity to the extent permitted by cost and practicality. Identified hazards are eliminated or controlled by the design of equipment, systems, and facilities.
- Develop mitigating provisions for hazards that cannot reasonably be eliminated or controlled through design which are controlled to an acceptable level using fixed, automatic, or other protective safety design features or devices. Provisions are made for periodic performance of functional checks of safety devices and employee training to meet system safety objectives.
- When design, training, and safety devices cannot reasonably nor effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons of the hazard.
- Where it is impossible to reasonably eliminate or adequately control a hazard through design or the use of safety and warning devices, procedures and training are used to control the hazard. Cautionary notations are standardized for use by all persons involved and safety-critical issues will require certification of authorized personnel.

The Risk Matrix defines the magnitude of any specific hazard item without implementation of design, construction, procurement, or operational measures to control or mitigate the risk.

Risk Reduction Program for Transit Operations

The ASP incorporates the Transit Operations and Maintenance Contractor Safety Policies and Procedures (Appendix B) to improve safety by reducing the number and rates of accidents, injuries, and assaults on transit workers based on data submitted to NTD. In addition, the Vanpool Contractor will prepare a similar document for their operations.

“Transdev will keep its employees, customers and surrounding public safe at all times. Given the risks involved with daily operations, Transdev seeks to implement a uniform, comprehensive set of safety policies and procedures to assist each employee in reducing the risk of collision, injury or other harm. These policies and procedures consist of a set of minimum standards, or operating procedures, to be implemented at every Transdev location.”

The Risk Reduction for Operations is completed using the following processes:

- The Transit Operations Contractor provides through relevant and ongoing education and training for all employees to ensure that assigned duties are completed safely and effectively.
- Refresher and in-service training are provided when new duties or processes are introduced and following accidents or the identification of potential hazards.
- The Transit Operations Contractor observes and evaluates the safety performance of all employees and provides meaningful feedback and re-establishes expectation for improvement when performance standards are compromised.
- Unsafe behaviors are immediately corrected to prevent accidents, injuries, and near misses. Bus operators are monitored through on-board and trail check evaluations, as well as regularly reviewing incidents.
- The Transit Operations Contractor conducts prompt, accurate, and thorough investigations of all accidents, injuries, illnesses, and near misses, to promote safety and prevent reoccurrences.
- Employees are subject to strict standards of accident preventability, undergo post-accident drug or alcohol testing following DOT requirements, and participate in post-accident training to correct unsafe driving behaviors. Employees who do not report an accident immediately will be subject to disciplinary action up to and including termination.
- Driver assaults are mitigated through training such as Assault Awareness and Prevention for Transit Operators through the National Transit Institute (NTI) training.
- De-escalation training through a third-party will be offered for all operations staff.

Safety Accountability and Responsibility -Safety Committee

The Transit Operations Contractor has established a Safety Committee as part of its Safety Policies and Procedures. The Safety Committee is comprised of at least four (4) members, and may

include the Operations Manager, Safety Trainer, Operators, and Dispatch personnel. ETA's Chief Safety Officer will also participate in these meetings.

- The Committee is made up of volunteers and assigned members chosen based on their safety record, attendance record, safety knowledge, leadership skills, overall safety attitude, and willingness to help and contribute to the activities of the committee.
- The names of the Safety Committee members will be communicated to all employees and will be identifiable through some aspect of uniform or bulletin board posting.
- Safety Committee members will be provided with the proper training to be effective in promoting safety initiatives.
- Safety Committee meetings will be documented and posted promptly after each session.
- The Safety Committee will promote safety awareness and employee involvement through incentive programs, safety communications programs, and recognition of safety accomplishments.
- The Safety Committee will solicit feedback and suggestions from employees.

The Safety Committee is responsible for taking a proactive position in assisting ETA management to implement SMS and identify and control hazards to ensure the highest practical degree of safety for ETA riders and employees. The Safety Committee will identify, recommend, and analyze the effectiveness of risk-based mitigations or strategies to reduce consequences identified in the ASP Safety Risk Assessment.

As Chairman of the Safety Committee, the Chief Safety Officer or SMS Executive bears the primary responsibility for coordinating implementation of the ASP and monitoring compliance.

The Safety Committee will be assigned to facilitate the incorporation of the System Safety Assurance Program into all aspects of transit operations and services. The Chief Safety Officer acts as a resource for the operations, maintenance, and administrative staff, and is responsible for the administration of the System Safety Program, with assistance from contractors as required.

The Chief Safety Officer will work with the Safety Committee to approve the ASP on an annual basis.

The Chief Safety Officer or their designee has the authority and responsibility to:

- Perform accident/incident investigations;
- Ensure all major accidents/incidents, hazards, and internal safety issues are reviewed and resolved;
- Ensure internal safety reviews and inspections are conducted;
- Report unacceptable hazardous conditions to the Executive Director as soon as possible;
- Work with operations and maintenance staff daily to ensure all System Safety Program requirements are implemented and Program goals and objectives are achieved;
- Develop Corrective Action Plans (CAP) that result from accident/incident investigations, hazard analyses, and safety reviews and audits, as well as tracking corrective actions through completion to ensure all identified deficiencies are adequately eliminated or mitigated;
- Ensure recommendations are followed up on and corrected;
- Review, approve, or recommend changes to the reports and CAPs, submitted to the Safety Committee for safety hazards, and threat and vulnerabilities audit findings and corrective actions, before submittal of the final reports to the responsible parties for implementation;
- Review, approve, or recommend changes to CAPs developed in response to recommendations of the Department of Transportation (DOT);
- Review, approve, or recommend changes to the annual reports of the internal safety review process required for submission to the DOT; and
- Review, approve, or recommend changes to transit safety rules and procedures established to implement the requirements and programs defined in the ASP. protection of themselves, co-workers, customers, and the public, considering the proper use of facilities and equipment.

Safety Assurances

Safety Performance Monitoring and Measurement

All ETA employees and its contractors are responsible for the prevention of accidents, identification of hazards, and resolution of such hazards. Reports of all accidents, incidents, occurrences, deficiencies, near misses, and defects will be maintained by the Manager of the appropriate department.

Compliance with Procedures for Operations and Maintenance

Through its contractors, ETA is assigned the responsibility for the safe operation of vehicles. Responsibilities include:

- Preparation and implementation of safe operating policies, plans, rules, and procedures;
- Development of safety policies, plans, rules, and procedures for safe operation and maintenance;
- Compliance with DOT work rules;
- Compliance with CDC and Prevention and State health authority guidance;
- Employees are provided with copies of safety and emergency rules, procedures, and policies that affect them;
- Personnel, whose safety record requires follow-up, additional training, or discipline, including discharge, are identified through maintenance of records;
- Through its contractors, ETA has developed a Fleet Maintenance Plan for each system hardware element, which is designed to maintain system safety. Reported deficiencies and defects in equipment and facilities are corrected and monitored to ensure satisfactory resolution. Only equipment known to be free of safety-related defects is placed into service.

ETA, through its contractors, will ensure all systems, equipment, and facilities operate as required, or in the event of failure or degradation of functionality, operational safety is not compromised. This aspect of maintenance directly pertains to the safety of transit customers, emergency response agencies, the public, employees, and subcontractors of transit.

Safety Inspections

Safety inspections will be conducted by the contractors. The inspections will be unannounced and documented with checklists and photos. Safety inspections performed by the contractor will be done according to their company guidelines and procedures.

Facilities Inspections

All operating and maintenance facilities will undergo a complete inspection by the Chief Safety Officer at least once a year to ensure the safety and health of employees. Individual maintenance shops within the maintenance facilities are inspected monthly. Inspection reports are issued, which list the hazards and the safety and health problems found during the inspection. Hazards identified during the inspection process are subject to the hazard management process. Follow-up inspections and reports are completed within 30 days. If the findings of the inspection can't be resolved within 24 hours, a work order will be opened and tracked until the finding is resolved.

Equipment Inspections

The contractor will ensure inspections of facility equipment are made in accordance with appropriate maintenance manuals and procedures. The contractor will ensure equipment and facilities are maintained at an optimum level of safety. Hazards identified during inspections are tracked until closure is achieved.

Vehicles – Preventive Maintenance

The contractor ensures all vehicles are maintained according to the Fleet Maintenance Plan. Most of the maintenance is mileage driven based maintenance. Maintenance is tracked and coordinated through mileage schedules, which are maintained by the contractor. All hard copies are kept in independent books for each vehicle for 1 year. All work completed for each vehicle is tracked through assigned repair order numbers for all repairs or designated maintenance inspection intervals. ETA's contractors are responsible for document control.

Maintenance schedules will follow a progressive preventative maintenance cycle, starting with the lowest mileage (routine inspection) through mid-level and major inspections. All vehicle inspections cover the equipment progressing at higher levels of detail for each inspection. Once the highest level of inspection is reached, the cycle starts again. In conjunction with the inspection cycle, mid-level and major overhauls are scheduled. These are time-based overhauls and rebuilds of major equipment per the manufacturer's requirements.

The maintenance criteria described above are strictly followed. If a bus is at the mileage or time requirement and the scheduled maintenance is not complete, the bus must be removed from service until the required maintenance is complete. No vehicles can carry passengers in service with any DOT Out of Service violations/criteria.

Safety Risk Mitigations

Work Orders

Each facility inspection report is sent to create the appropriate work orders, if applicable. It identifies specific areas and targets specific recommendations for corrective action. Unacceptable hazards identified are reported to the Chief Safety Officer.

The Contractor will generate Work Orders for defects identified during Fleet Maintenance, Facilities Management, and Systems Maintenance inspections.

Hazardous Material & Local, State & Federal Regulations

The Occupational Safety and Health Act (OSHA) program is directed towards achieving a safe working environment for employees and minimizing the likelihood of accidents. The program emphasizes the recognition, evaluation, and control of hazards arising in and from the occupational environment.

Hazardous Materials Control

ETA and its contractors are fully aware of the importance of employee chemical safety programs and the duty to comply with legally mandated hazardous materials rules and regulations. ETA's Hazard Communication Programs comply with Title 29 Code of Federal Regulations Part 1910.1200, Hazard Communication Program. The Hazard Communication Program covers the procurement, receipt, storage, and disposal of hazardous materials. It also documents the maintenance of Safety Data Sheet (SDS) binders and employee training.

Hazardous waste/chemical safety inspections are included in the responsibilities for safety inspections. When necessary, consultants may be hired for special projects such as indoor air quality, chemical vapor, and particulate sampling.

The Chief Safety Officer reserves the right to reject a product if it is deemed either too hazardous for employee use or is unable to provide adequate safeguards or protection.

The SDS review/request procedure, which requires SDS review and approval by the Chief Safety Officer or designee or contractor, is included in the Hazard Communication Program. These programs are the responsibility of the affected division and the Chief Safety Officer. Program effectiveness is reviewed via the Internal Safety Audit Process. SDS for all hazardous materials considered for purchase and use are reviewed by the contractor for approval. The user furnishes the manufacturer's SDS for hazardous products and information on the planned use and application methods. Follow-up is conducted on the field use of approved products to ensure safe/proper handling methods are utilized. The contractor is responsible for keeping current files of all SDS at the Bus Maintenance Facility.

Personal Protective Equipment

All personal protective equipment used by ETA personnel and contractors is reviewed and approved by the Chief Safety Officer or contractor staff in accordance with respiratory, hearing conservation, electrical gloves, and other applicable safety standards.

Safety/Industrial Hygiene Training and Education

ETA provides training to employees and directs contractors to provide training in basic, safe work practices and hazard identification. Employees/contractors exposed to chemicals and/or potentially overexposed to physical agents receive training in industrial hygiene principles, use and care of personal protective equipment and hazards, and safe handling methods of chemicals.

Drug & Alcohol Program

ETA and its contractors are certified as a drug-free workplace and comply with all provisions of the U.S. Department of Transportation, Federal Transit Administration, 49 CFR Part 655, Prevention of Alcohol Misuse in Transit Operations, and 49 CFR Part 40 Procedures for Transportation Workplace Drug and Alcohol Testing Programs.

Covered employees receive training on the effects and consequences of prohibited drug use and additional training on the effects of alcohol on personal health, safety, the work environment, and on the signs and symptoms that may indicate prohibited drug use. Supervisors will, in addition to the covered employee training, receive an additional 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable drug use.

ETA and its contractors are responsible for administering the FTA Drug and Alcohol-Free Workplace regulations. ETA contractors are responsible for administering the Substance Abuse Policy.

Employee Safety Reporting

Safety reporting is an essential part of SMS. ETA management fosters an atmosphere of trust that encourages and rewards employees for providing safety-essential information, even if it is self-incriminating, without fear of reprisal. An effective SMS empowers employees with the confidence to raise concerns that may lead to serious safety/quality errors and assures them someone will listen to them and investigate their issues or concerns in a professional manner — all without fear that they will face unduly harsh penalties for admitting genuine mistakes.

Table 6. Guideline for Mitigation and Management of Safety Events

Human Error	At-Risk Behavior	Reckless
An inadvertent action – slip, lapse, mistake	A choice – risk not recognized or believed justified	Conscious disregard of unreasonable risk
Manage through: > Processes & procedures > Checklists > Training > Design	Manage through: > Increase situational awareness > Remove incentives for at-risk behavior > Create incentives for safe behavior	Manage through: > Remedial action > Punitive action

What is important to emphasize is that any cultural change in the organization will take time to be fully implemented and see the results of these changes.

Investigation of Safety Events

All employees and contractors are expected to comply with ETA's accident and incident reporting procedures and use the forms prescribed. Roles, responsibilities, and accident reporting thresholds are outlined in the procedure, including accident notification, reporting, and investigation throughout the organization. The level of investigation required is dependent on the seriousness of the event.

Notification of Accidents and Incidents to External Agencies

Recordable accidents tracked by ETA and made available to DOT, MPO, and FTA:

- Fatality (occurring at the scene or within 30 days following the accident).
- One or more persons requiring immediate medical treatment away from the scene of the accident.
- One or more vehicles incurring disabling damage and needing to be towed from the scene of the accident as a result of the accident.

Job related employee fatalities shall be reported to the Occupational Safety and Health Administration within 8 hours of occurrence. Inpatient hospitalization, amputation, or eye loss shall be reported within 24 hours.

Under the NTD Safety and Security Reporting Manual, **substantial damage** is defined as damage to any involved vehicles, facilities, equipment, rolling stock, or infrastructure that:

- Disrupts the operations of the transit agency

- Adversely affects the structural strength, performance, or operating characteristics of the vehicle, facility, equipment, rolling stock, or infrastructure, requires towing, rescue, on-site maintenance, or immediate removal before safe operation.

Substantial damage excludes damage limited to:

- Cracked windows
- Dents, bends, or small puncture holes in the body

Accident/Incident Reporting and Documentation

Each bus investigation conducted on behalf of DOT must be documented in a final report that includes a description of investigation activities, findings, identified causal factors, and a CAP, if applicable. All accident reports must follow the requirements established in the contractor's accident investigation plan. At its discretion, and as specified in its accident investigation plan, ETA or its contractors may separate its investigation report into two parts:

- Description of investigation activities, investigation findings, and determination of the most probable cause and additional contributing causes; and
- Recommendations to prevent recurrence, including a CAP that implements the recommendations.

ETA or its contractors prepare written accident and unacceptable hazardous condition reports on standard forms. Such written reports are maintained. Reports contain the most probable cause, other contributing causes, CAPs, and a schedule for implementing corrective actions.

The status investigation reports, at a minimum, shall include:

- Minutes of any meeting held by a local safety ad hoc reportable event investigation committee or contractor
- Disclosure of any immediate corrective actions of planned or completed principal issues or items currently being evaluated
- Overall progress and status of the investigation.

Written reports are filed for all occurrences that fall into the category of an accident, incident, or injury. The Chief Safety Officer files a monthly statement of all accidents, incidents, unacceptable hazardous conditions, and tracks open corrective action items through completion.

In addition, ETA maintains a file of the annual safety performance report in a format available for review by DOT at any time during an investigation. The report shall be prepared, and a full briefing on the known circumstances of the event, the status of ETA's investigation, and the investigation activities.

Reports and records of accident investigations submitted to DOT by ETA, as well as related reports and records produced by both DOT and ETA, will be treated as confidential information and will not be released without concurrence by both DOT and ETA.

Internal Safety Reporting

ETA and its contractors have the responsibility to monitor the safety performance of operations. The Chief Safety Officer is responsible for compiling and analyzing all safety data to determine if safety performance meets established safety goals. This data includes injuries to passengers, contractor personnel, public; potentially hazardous equipment failures; unacceptable hazardous conditions; and rules as well as procedure violations. A closed-loop reporting system for identifying and monitoring safety-related items has been established. To close out each incident, safety verification activities and results are reviewed and audited by the contractor and reviewed by the Chief Safety Officer. The Chief Safety Officer is responsible for providing safety data to the contractor for review. The Chief Safety Officer monitors Safety Key Performance Indicators utilizing several tools and provides monthly progress updates to the Executive Director.

Tracking of hazard-related data is used to identify trends. These trends are further analyzed and/or investigated to determine causal factors. Tools available to the Chief Safety Officer include Risk-Based Analysis, Monthly Performance reviews, data analysis, and trends.

The Chief Safety Officer and its contractors are responsible for information regarding accidents, incidents, hazardous conditions, and operations, which are obtained from different reporting mechanisms. These include but are not limited to: Accident/Injury Reports and Investigations, Incident Reports, Daily Operations Summaries, Operator and Supervisor Reports, Employee/Occupational Injury reports, mining of maintenance data, analysis of vehicle records, and procurement contracts.

Internal Audits

The purpose of internal system safety audits is to perform an official evaluation of accomplishments, problems, and trends related to safety and to evaluate the effectiveness of the implementation of the ASP. The Chief Safety Officer is responsible for the direction of the safety reviews and audits of its contractors to determine performance related to the Safety goals and objectives.

Organizational functions subject to the safety audit process include:

- Facility inspections
- Maintenance audits/inspections
- Review of rules, standard operating procedures, special bulletins, and orders
- Review of training/re-certification programs
- Emergency response planning, coordination, training
- Configuration Management
- Systems modifications (review and approval)
- Safety data analysis
- Employee safety programs
- Hazardous materials program
- Interdepartmental safety goals and objectives
- Occupational safety and health programs
- Contractor Safety
- Procurement and specification engineering
- Drug and Alcohol Testing Program
- Any aspect or responsibility as outlined in this document

ETA and contractors are subject to safety audits. The critical nature of certain operations requires rigorous development of reviews and audits. These include training, maintenance, and operations activities. Both periodic and no-notice inspections are undertaken to address all aspects of the activity, including documentation, practices, and compliance with the ASP and other requirements. The Chief Safety Officer reviews training, practices, and procedures to correct deficiencies identified during the performance of audits or other safety activities, including inspections and emergency drills.

Safety Audit Process

The Chief Safety Officer is responsible for the management of the Internal Safety Audit Program. All ETA employees and contractors are required to cooperate fully with Safety and Security personnel. Contractors and senior managers ensure their areas participate fully in the safety audit process.

Management of Change

Configuration Management requirements will be included in all contracts to ensure changes to the design of equipment and facilities, after design reviews, are adequately documented and approved. The configuration management process uses baseline management to ensure the technical baseline is defined and controlled throughout the maintenance and operation phase, and the end products satisfy the technical and operational requirements derived from the system needs.

Selected documentation, such as as-built drawings, manuals, procedures, and other documents, are formally designated and approved as part of the technical baseline and are under ETA control for future capital projects, all documents related to the segment/phase that are under the control of a contractor will be turned over for control and maintenance following completion of said phase.

For future capital or maintenance improvement projects, the designated contractor shall be responsible for quality control testing and inspections if required in accordance with an approved Quality Control Plan by ETA.

Additions or modifications to bus operations, and to the existing configuration of presently operating system fixed facilities, rolling stock, and equipment directly related to the operation of rolling stock, are approved by the Chief Safety Officer. These reviews are established to ensure system and operational changes are approved before implementation, and drawings, manuals, and other related documents, including training programs, are updated to reflect these changes, which are also reflected in the Maintenance Management Plan.

Upon the approval of any system or operations change, ETA will create Special Instructions or create and/or revise current SOPs to advise affected employees. Supervisors will distribute to each employee the new control document, ensuring each employee understands the operational change as it applies to their job. Each employee is required to sign for their copy and place the updated material into their SOP book.

Continuous Improvement

Continuous improvement is measured through monitoring safety performance indicators. Progress is related to the maturity and effectiveness of the SMS. Safety assurance processes support improvements to the SMS through continual verification and follow-up actions.

These objectives are achieved through the application of internal evaluations and independent audits of the SMS. Compliance with this requirement is indicated when:

- The Safety Committee has the necessary authority to make decisions related to the improvement and effectiveness of the SMS; or
- The SMS is periodically reviewed for improvements in safety performance.

This element is satisfied when the organization routinely monitors the SMS performance to identify potential areas of improvement, and the outcomes of this process lead to improvements to the SMS, which includes the inclusion of best practices as they come forth.

ASP Annual Review Process

ETA has the authority for the development, implementation, and management of the ASP. It also has the primary responsibility of implementing the ASP with oversight and review by the Chief Safety Officer and Accountable Executive. Annual review of the ASP is mandatory, and ETA-specific responsibilities within the ASP framework include, but are not limited to:

- By November of each year, notify the Chief Safety Officer of any recommended changes to the ASP for review and approval by the Executive Director;
- Revisiting the ASP annually to reflect changes in organizational structure and new systems that require significant changes in operation;
- Review progress on goals and objectives;
- Refine and improve on the current goals and objectives of the SMS program;
- Identify new tasks or objectives to respond to system growth or any new regulations that affect safety and security;
- Identify any additional or emerging safety or fire/life safety-related tasks and responsibilities.

At every point of the review process, the Chief Safety Officer will work with the Safety Committee for comments, suggestions, and revisions to the ASP. Ongoing review and revision of the ASP ensures the document remains current.

Safety Promotion

Safety training is conducted on facilities, equipment, and vehicles. Operating rules and SOPs will be prepared by ETA and provided to all personnel. The Chief Safety Officer and its contractors oversee the formulation of training programs and records.

Safety Training Program

ETA periodically conducts reviews and oversight activities related to the training program. Activities or functions deemed safety-critical may require specialized training and/or certification. This ongoing training is included in regular safety meetings, and all documentation is also kept at the facility.

Refresher training is conducted at least annually for operations and maintenance contractor employees and as needed when situations related to employee performance warrant it. Emergency responders are also trained during the pre-revenue period and through annual drills. These are also documented, and records are retained at the facility.

Operations Personnel Training

All bus operators will be required to complete the contractor's Bus Operation Training Program (Operator Development Program). This course covers SOPs and Operator Rules that govern operational activities. New Operators are also provided with behind-the-wheel training by a certified Instructor.

New bus operators are also evaluated by establishing their contractors using an Observation Report Form. New Operators must meet all criteria satisfactorily; otherwise, they will receive additional training. The contractor, on a separate occasion before certification, will determine whether each Operator demonstrates safe control of the revenue vehicle or needs additional training. Each Operator is certified with both written and practical testing to validate operational readiness.

Annually, the contractor will ensure each operator is given a refresher course on the rules and procedures and will recertify with written and practical testing. The re-certification may consist of one or more of the following: a quiz, a checklist, a test, and a demonstration of troubleshooting techniques. Any person who fails the annual examination is given special retraining.

Updated training materials will be developed under the coordination of the contractor in conjunction with the Chief Safety Officer prior to the opening of any new bus extension or major modification to the existing routes or introduction of new vehicles. Operations personnel will be certified by either written or practical testing.

Operators through their employer (contractor) are subject to periodic in-service evaluation, or Operators by Route Supervisors who monitor their compliance with rules and procedures outlined in the Rule Book and SOPs. Route Supervisors shall complete a Driver Evaluation Form after completion of the in-service evaluation and will review the information in the report with the Operator. Positive reinforcement is given as warranted. Operators observed violating rules or procedures may be subject to progressive discipline.

The contractor will maintain a Rule Violation Log that chronicles safety violations each month and administers all disciplinary actions, retraining, re-instructions, and determines the consequences of any rule violations. Which will be made available to the Chief Safety Officer upon request.

Maintenance Personnel Training

The contractor's maintenance requirements, methods, and procedures for the facility equipment and systems will be described in manuals, handbooks, and other documentation developed for the training and certification of maintenance personnel. Use of personal protective equipment, emergency equipment, and safety instructions is included within the training program.

The contracted maintenance personnel are required to operate buses, heavy equipment, or other specialized vehicles/equipment/apparatus, and will be certified by both written and practical testing to document the employee's knowledge of safety and operating procedures and skill in the proper and safe operation and procedures. Annually, each employee will re-certify the proper and safe use of the equipment/vehicles with written and practical testing. Any person who fails the annual examination will be given special retraining.

Safety Training

The contractor's safety information on approved methods and procedures is used in manuals, handbooks, and other documentation developed for the training and certification of operators and maintenance personnel. Identification of protective devices and emergency equipment is included in the training documentation and instruction. In addition, safety posters and notices are used, as appropriate, to enhance awareness during all phases of system operations. Proficiency demonstrations and certifications are required of all operators and maintenance personnel. Safety concerns are incorporated in briefings given to personnel before they work with hardware or facilities. The Chief Safety Officer will review the safety training program every six months to ensure training materials and programs remain consistent with employee needs.

Emergency Response Personnel Training

Training to familiarize fire, police, and emergency service personnel with facility requirements is coordinated through and conducted by ETA and its contractors. Emergency preparedness and response drills are developed by ETA and its contractors. Training classes, drills, and after-action reviews are then conducted with emergency service personnel and ETA personnel to:

- Ensure the adequacy of emergency plans and procedures;
- Ensure readiness of the ETA's and contractor personnel to perform under emergency conditions; and
- Ensure effective coordination between the ETA, its contractors, and emergency response personnel and outside agencies.

Contractor Safety

Contractors, not part of operations activities associated with the facility, must seek approval, in writing, from ETA to perform work on property and infrastructure. ETA must ensure the requesting party abides by ETA's safety requirements. Requirements include but are not limited to: reflective safety vests, safety signaling to operators, and an understanding of all unsafe conditions. ETA may require contractors to attend safety classes before approval and issuance of an Access Permit; this requirement depends on the work request. ETA will determine which contractors shall attend such classes and receive certification before the approval and issuance of an Access Permit when necessary.

Record Keeping

ETA contractors maintain personnel records for all training activities conducted by employees.

Compliance with Training Requirements

The internal audit process includes the means of determining that all necessary training is conducted and documented, including the proper qualification of operating and maintenance personnel. Training materials, testing, and grading processes are reviewed and evaluated for completeness and accuracy.

The audit process is guided by the following criteria related to training compliance:

- Identify training requirements for all personnel related to safety. This encompasses initial and refresher training of procedures, equipment uses, and manufacturers' training, retraining requirements identified due to accident or incident investigations.

- Review all training programs identified for safety adequacy.
- Assess the effectiveness of the training programs and on-the-job experience by conducting emergency scenarios, drills, audits, and evaluations. These job evaluations are based on job performance, statistical trends, and public feedback.
- Review employee performance, including employee records and conduct in-person interviews to confirm technical knowledge and issues.
- Evaluate training provided to operations personnel and emergency response personnel when substantive operational changes are made, or with the introduction of new equipment, facilities, or specialty vehicles

Safety Communication

ETA and its contractors have a robust Safety Communications program consisting of:

- Monthly Safety Meetings Initiative
- Topic-specific videos, posters, bulletins addressing risk-prioritized defensive driving and injury prevention topics
- Safety Campaigns
- Local management communications
- Intranet Communications; and
- Safety Posters and Bulletins

FTA Issues General Directive to Protect Nation's Frontline Transit Workers from Assault

On September 26, 2024, the FTA issued a General Directive to protect our nation's frontline transit workers from assaults. General Directive 24-1: Required Actions Regarding Assaults on Transit Workers will require more than 700 transit agencies nationwide to take action and address ongoing incidents of assaults on transit workers. This directive reflects FTA's commitment to the safety of transit workers and the need to address at the federal level the problem of verbal and physical assaults they face while at work.

Assaults have increased by more than 120 percent between 2013 and 2021. The General Directive requires all transit agencies subject to FTA's PTASP regulation to complete a safety risk assessment. They are required to assess the risk of assaults on their workers using the Safety Management System processes outlined in their agency safety plans.

The directive, a significant and necessary next step in FTA's efforts to better protect frontline transit workers, requires transit agencies to assess the risk of assaults on the
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agency's transit workforce using the SMS processes outlined in its ASP.

- Conduct a safety risk assessment related to assaults on transit workers. If a transit agency's safety risk assessment shows an unacceptable level of risk of assaults on transit workers, they must identify strategies to mitigate that risk and improve transit worker safety.
 - o If a transit agency's safety risk assessment shows an unacceptable level of risk of assaults on transit workers, they must identify strategies to mitigate that risk and improve transit worker safety.
 - For transit agencies serving large urbanized areas (with populations of 200,000 or more), they must comply with PTASP requirements to involve the joint labor-management Safety Committee when identifying safety risk mitigations and strategies.
- Provide information to FTA within 90 days on how they are assessing, mitigating, and monitoring the safety risk associated with assaults on transit workers.

This information will help FTA understand how transit worker assault safety risk assessments and safety risk mitigations vary throughout the industry, informing the agency of further activities that may be effective in reducing the risk of assaults on transit workers.

On January 16, 2025, FTA published Responses to General Directive 24-1: Required Actions Regarding Assaults on Transit Workers. FTA's initial analysis of agency responses shows more than two-thirds of transit agencies determined that safety risk mitigations are necessary to reduce the risk of assaults on transit workers, and these agencies are working to roll out a variety of mitigation measures. Details is available at <https://www.transit.dot.gov/regulations-and-programs/safety/responses-general-directive-24-1-required-actions-regarding>

Terms and Abbreviations

The following definitions used in this document are consistent with 49 CFR Parts 625, 630, 670, 673, and 674 as of September 2016.

Accident: Any event involving a transit vehicle or taking place on transit-controlled property where one or more of the following occurs:

- A loss of life;
- A report of a serious injury to a person;
- A collision of a transit vehicle;
- A runaway of transit vehicle;
- An evacuation for life safety reasons; or
- Any transit vehicle, at any location, at any time, whatever the cause

An accident must be reported in accordance with the thresholds for notification and reporting set forth in Part 674.

Administrator: The Federal Transit Administrator or the Administrator's designee.

Advisory: a notice from FTA to recipients regarding an existing or potential hazard or risk in public transportation that recommends recipients take a particular action to mitigate the hazard or risk.

Agency Safety Plan (ASP): a document adopted by a Transit Agency detailing its safety policies, objectives, responsibilities, and procedures.

Assaults on Transit Workers: The number of assault incidents reported to the NTD, it is defined as physical or non-physical interference with a transit worker by someone, done without lawful authority, while the worker is performing their duties. Reporting includes contexts regardless of whether it caused injury.

Assaults on Transit Workers Rate: The number of assault incidents reported to the NTD, divided by the VRM Vehicle Revenue Miles

Audit: an examination of records and related materials, including, but not limited to, those related to financial accounts.

BTW: Behind-The-Wheel, a type of required Operator training

CDC: Center for Disease Control

CEL: Certifiable Elements List

CFR: Codes of Federal Regulations

Chief Safety Officer (CSO): an adequately trained individual who has responsibility for safety and reports directly to an Executive Director, president, or equivalent officer. The CSO does not serve in other operational or maintenance capacities, unless the Transit Agency is a small public transportation provider as defined in Part 673, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

CM: Construction Manager.

Collisions. This includes all collisions reported to the NTD, divided by VRM. It's a mode-specific measure showing collisions relative to revenue miles traveled.

Collision Rate: All collisions reported to the NTD, divided by the annual VRM

Consequence: the potential outcome(s) of a hazard.

Continuous Improvement: a process by which a transit agency examines safety performance to identify safety deficiencies and carry out a plan to address the identified safety deficiencies.

Contractor: An entity that performs tasks on behalf of FTA, a State Safety Oversight Agency, or a Transit Agency, through contract or other agreement.

Corrective Action Plan (CAP): A plan developed by a Transit Agency that describes the actions the Transit Agency will take to minimize, control, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require a Transit Agency to develop and carry out a CAP.

Direct Recipient: an entity that receives funds directly from the Federal Transit Administration.

DOT: Department of Transportation

Event: An Accident, Incident, or Occurrence

Executive Director: Executive Director of the Transit Agency and Accountable Executive

Facility: a building or structure that is used in the provision of public transportation.

FMLA: Family Medical Leave Act

FRA: The Federal Railroad Administration is an agency within the United States Department of Transportation

FTA: The Federal Transit Administration is an agency within the United States Department of Transportation.

Fatality: A loss of life resulting from an accident or incident as reported to the NTD

Fatality Rate: This includes all fatalities as defined by the NTD, divided by the annual VRM Vehicle Revenue Miles

Grade Crossing (as defined in the National Transit Database glossary): an intersection of roadways, railroad tracks, or dedicated transit rail tracks that run across mixed traffic situations with motor vehicles, streetcar, light rail, commuter rail, heavy rail, or pedestrian traffic; either in mixed traffic or semi-exclusive situations.

Hazard: Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a rail's fixed guideway public transportation system; or damage to the environment

Hazard Analysis: The method by which hazards are identified and analyzed as to their possible effects upon the safe operation of the entire system (i.e., Failure Mode and Effect Analysis, Fault Tree Analysis, Stress Analysis, etc.)

Hazard Identification: formal activities to analyze potential consequences of hazards during operations related to the provisions of service.

Hazardous Condition: An immediate condition that could cause an accident involving personal injuries or death.

Incident: An unforeseen event or occurrence that does not necessarily result in death, injury, contact, or property damage. As defined by the FTA, an Incident is:

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.

Individual: Any person at the property of a transportation system.

Injury: Any physical damage or harm to persons because of an incident that requires immediate medical attention away from the scene.

Injury Rate: All injuries reported to the NTD in a given year, divided by the VRM Vehicle Revenue Miles

Investigation: The process of determining the causal and contributing factors of an accident, incident, or hazard, for preventing recurrence and mitigating risks

Lagging Indicators: provide evidence, through monitoring, that intended safety management outcomes have failed or have not been achieved.

Leading Indicators: provide evidence, through monitoring, that key safety management actions are undertaken as planned.

Major Event: These are significant safety and security incidents that meet at least one NTD reporting threshold. They include collisions, fires, derailments, hazardous material spills, acts of nature, evacuations, or other serious occurrences involving transit operations—or property damage above \$25,000, injuries requiring immediate medical attention away from the scene, or fatalities.

Major Event Rate: This includes all safety and security major events as defined by the NTD, divided by the annual VRM or Vehicle Revenue Miles

Management of Change: a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process.

National Public Transportation Safety Plan: The plan to improve the safety of all public transportation systems that receive Federal Financial Assistance under 49 U.S.C. Chapter 53.

Near Miss: a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations.

NTSB: National Transportation Safety Board, an independent federal agency.

Occurrence: An Event without any personal injury in which there is any damage to facilities, equipment, rolling stock, or infrastructure, but does not disrupt the operations of the transit agency.

Pedestrian Collisions. A subcategory of the Collision Rate, representing collisions involving pedestrians—counted regardless of injury—divided by VRM.

Person: A passenger, employee, contractor, pedestrian, trespasser, or any individual on the property of a public transportation system.

Performance criteria: categories of measures indicating the level of safe performance within a Transit Agency.

Performance Measure: a parameter used to assess performance outcomes.

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

PHA: Preliminary Hazard Analysis.

PPE: Personal Protective Equipment

Practical Drift: the slow and inconspicuous, yet steady uncoupling between written procedures and actual practices during the provision of services.

Program Standard: is a written document developed and adopted by a State that describes the policies, objectives, responsibilities, and procedures used to provide safety and security oversight of a transit agency.

Public Transportation Agency Safety Plan (PTASP): The comprehensive ASP for a transit agency that is required by 49 U.S.C. 5329(d) and based on a Safety Management

System. Until one year after the effective date of FTA's PTASP Final Rule, a System Safety Program Plan (SSPP) developed pursuant to comply with 49 CFR part 659 will serve as the transit agency's safety plan.

Public Transportation Safety Certification Training Program: Either the certification training program for Federal and State employees, or other designated personnel, who conduct safety audits and examinations of public transportation systems, and employees of public transportation agencies directly responsible for safety oversight, established through interim provisions in accordance with 49 U.S.C. 5329(c)(2), or the program authorized by 49 U.S.C. 5329(c)(1).

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

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

Sabotage: The deliberate destruction of transit property or the slowing down of public transit operations by employees with the intention of damaging business or the economic condition of the transit agency.

Safety: the state in which the potential for harm to persons or property damage during operations related to the provision of reduced and maintained at an acceptable level through continuous hazard identification and safety risk management activities.

Safety Certification: The process used to verify the system meets criteria, codes, regulations, and contract requirements as they relate to safety, fire/life safety, and security.

Safety Performance: an organization's safety effectiveness and efficiency, as defined by safety performance indicators and safety performance targets, measured against the organization's safety objectives.

Safety Performance Indicator: a data-driven, quantifiable parameter used for monitoring and assessing safety performance.

Safety Performance Measurement: the assessment of non-consequential safety-related events and activities that provide ongoing assurance that safety risk mitigations work as intended.

Safety Performance Monitoring: the activities aimed at the quantification of an organization's safety effectiveness and efficiency during service delivery operations, through a combination of safety performance indicators and safety performance targets.

Safety Performance Monitoring and Measurement: activities a transit agency must Monitor its system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance; monitor its operations to identify hazards not identified through the Safety Risk Management process; monitor its operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended; investigate safety events to identify causal factors.

Safety Assurances Reporting Program: a process that allows employees to report safety conditions to senior management, protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.

Safety Review: a formal, comprehensive, on-site review by DOT or FTA of the transit agency's safety practices to determine whether the agency complies with the policies and procedures required under the Safety Plan.

Safety Risk Management: A process within an ASP for identifying hazards and analyzing, assessing, and mitigating safety risks.

Security and Emergency Preparedness Plan (SEPP): is defined as a document developed and adopted by the transit agency describing the application of operating, technical, and management techniques and principles to the security aspects of the system throughout its life to reduce threats and vulnerabilities and describing the emergency preparedness policies and procedures for mobilizing the system and other public safety resources to assure rapid, controlled, and predictable responses to various types of transportation and community emergencies.

Serious Injury: Any injury which requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received;

results in a fracture of any bone (except simple fractures of fingers, toes, or nose); causes severe hemorrhages, nerve, muscle, or tendon damage; involves any internal organ; or involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

SMS Executive: A Safety Officer or an equivalent.

SSOC: Safety & Security Operations Committee

State: 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 (SSO): 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 outlined in this part.

Subsystem: An element of a system that may constitute a system

System Reliability: The number of Major Mechanical System failures where the vehicle could not continue in service, divided by the annual VRM Vehicle Revenue Miles

System Reliability. Measured as the mean vehicle-revenue miles (VRM) traveled between major mechanical failures. Higher values signal better performance—less downtime between failures.

System Safety Program Plan (SSPP): It is a document developed and adopted by the transit agency, describing its safety policies, objectives, responsibilities, and procedures. Until one year after the effective date of FTA's PTASP Final Rule, an SSPP developed to comply with 49 CFR part 659 will serve as the rail transit agency's safety plan.

System Security Plan (SSP): A document developed and adopted by the transit agency describing its security policies, objectives, responsibilities, and procedures.

Transit Worker Injury Rate: The number of Transit Worker injuries reported to the NTD in a given year, divided by the VRM (Vehicle Revenue Miles)—an important indicator for workforce safety.

Transit Worker Fatality Rate: The number of Transit Worker Fatalities reported to the NTD in a given year, divided by the annual (VRM) Vehicle Revenue Miles

Vehicle: Any rolling stock used on a public transportation system, including, but not limited to, passenger and maintenance vehicles.

Vehicular Collision Rate: Though not always explicitly defined, this is typically understood as collisions involving another vehicle (excluding pedestrians). All collisions with a motor vehicle reported to the NTD, divided by the annual VRM Vehicle Revenue Miles

Appendix A - ETA Board Minutes



**Regular Meeting of the Board of Directors of the
El Paso Area Transportation Services, Local Government Corporation doing business as the El
Paso Transportation Authority
Friday, February 27, 2026 - 01:30 P.M.
Rio Grande Council of Governments
8037 Lockheed Drive, Suite 100, El Paso, Texas, 79925**

MINUTES PREPARED BY ANA Q. SANCHEZ, ADMINISTRATIVE SPECIALIST SENIOR

Prior to the meeting being called to order, informational presentations were provided to members of the Board who were present. No quorum action was taken and no votes were conducted during this time. The following informational items were presented:

Pre-Meeting Informational Presentations

4.a. Present a certificate to Transdev's employee of the month for January 2026.
(Presented by Sylvia Balcazar, Transdev General Manager)

NO ACTION – In the absence of General Manager Sylvia Balcazar, Transdev Operations Manager Jennifer Garcia presented the Employee of the Month recognition for January 2026 to Rosario Ayala. Rosario was recognized for her dedication to safety, consistent adherence to operational guidelines, and commitment to creating a welcoming and safe environment for passengers. She was commended as one of Transdev's top drivers for her professionalism and outstanding service.

4.c. Presentation from Texas County & District Retirement System (TCDRS) regarding El Paso Transportation Authority participation.
(Presented by Kristina Fox, Development Manager, Employer Services, TCDRS)

NO ACTION – Kristina Fox, Development Manager of Employer Services for the Texas County & District Retirement System (TCDRS), presented information regarding potential El Paso Transportation Authority (ETA) participation in the TCDRS retirement plan. She discussed efforts to transition current ETA employees and noted that a cost study indicates participation would likely result in lower costs to ETA due in part to employee demographics. The presentation also highlighted plan features such as a five-year vesting period, group term life insurance, and individual retirement accounts for employees should the Board elect to separate from El Paso County's plan. Employees' prior years of service would be honored, allowing them to vest with both El Paso County and ETA while continuing to accumulate matching contributions. Ms. Fox stated she will attend the March Board meeting in person and will provide informational packets outlining plan details, funding, and similarities to the El Paso County retirement plan.

4.b. Receive a report from the Access Advisory Committee (AAC) Chair for activities in the Fall Quarter 2025.

(Presented by Molly Saenz, AAC Chair)

NO ACTION – Access Advisory Committee Chair Molly Saenz reported on committee activities and updates for the Fall Quarter 2025. She informed the Board that two members were removed due to failure to attend meetings, and vacancies were filled with the appointment of Adrian Hatcher and Andrea Ramirez. Ms. Saenz also noted that the committee is considering revisions to allow guardians to serve as members.

6.a. Discussion regarding Fiscal Year 2026 Operating Budget and projected Federal Transit Administration funding potential available to El Paso Transportation Authority.

(Presented by Michael Walk, Texas A&M Transportation Institute)

NO ACTION – Michael Walk of the Texas A&M Transportation Institute presented a work-in-progress update on the FY2026 budget reconciliation and spending plan, as well as the FY2027 financial plan and contribution projections.

Call to Order

The El Paso Area Transportation Services Local Government Corporation meeting was called to order at 2:49 p.m. by Chair Commissioner Jackie Butler, at which time a quorum of the Board was present. Members in attendance were:

VOTING MEMBERS

Chair- Commissioner Jackie Butler	El Paso County	Present
Arturo Rubio (Vice Chair)	Horizon City	Present
Joel Bishop	El Paso County	Present
David Stout	El Paso County	Present
Andrea Carrillo - Virtual	Village of Vinton	Present
Eddie Conde	City of San Elizario	Present
Arnulfo “Arnie” Castaneda	Town of Anthony	Absent
Daniel Vallejo – Virtual	Town of Clint	Present

EX-OFFICIO MEMBERS

Xavier Banales	WTEP	Present
Alejandra Valadez - Virtual	City of Socorro	Present
Harrison Plourde - Virtual	El Paso MPO	Present
Karl Rimkus	Sun Metro	Present

4. PRESENTATION

4.a. Present a certificate to Transdev's employee of the month for January 2026.
(Presented by Sylvia Balcazar, Transdev General Manager)

NO ACTION - In the absence of General Manager Sylvia Balcazar, Transdev Operations Manager Jennifer Garcia presented the Employee of the Month recognition for January 2026 to Rosario Ayala. Rosario was recognized for her dedication to safety, consistent adherence to operational guidelines, and commitment to creating a welcoming and safe environment for passengers. She was commended as one of Transdev's top drivers for her professionalism and outstanding service.

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6.a. Discussion regarding Fiscal Year 2026 Operating Budget and projected Federal Transit Administration funding potential available to El Paso Transportation Authority.
(Presented by Michael Walk, Texas A&M Transportation Institute)

NO ACTION - Michael Walk of the Texas A&M Transportation Institute presented a work-in-progress update on the FY2026 budget reconciliation and spending plan, as well as the FY2027 financial plan and contribution projections. He discussed efforts to revise line-item budgets within ETA grants to ensure alignment between available funding and planned expenditures. Mr. Walk also noted that staff are gathering information for the FY2027 plan, including potential service changes, grant funding assumptions, and a transition plan. Two planning scenarios are being developed for FY2027—implementing all service improvements outlined in the Transit Development Plan and maintaining the status quo—with a request from the Board to include a third scenario. Additional considerations to be presented in March include the cost of operating Socorro's micro-transit service, the absence of a fund balance, options for allocating costs and contributions for ETA Access and ETA Andale services, and forecasts for Rural and Urban grant programs.

1. PLEDGE OF ALLEGIANCE

2. PUBLIC COMMENT

No members of the public provided comment.

5. CONSENT AGENDA

5.a. Approve the January 28, 2026, ETA regular minutes.

(Presented by Ana Q. Sanchez, Administrative Specialist, Senior)

5.b. Approve the Rio Grande Council of Governments to process the expenses incurred in January 2026 for administrative services and travel reimbursements.

(Presented by Annette Gutierrez, Rio Grande Council of Governments Executive Director)

5.c. Appoint Andrea Ramirez as an agency representative and Adrian Hatcher as a rider to the Access Advisory Committee.

(Presented by John Andoh, Executive Director)

5.d. Adopt revised Bylaws for the Access Advisory Committee.

(Presented by John Andoh, Executive Director)

5.e. Authorize the purchase of insurance from the Texas Municipal League Intergovernmental Risk Pool.

(Presented by John Andoh, Executive Director)

5.f. Adopt a Transit Asset Management Plan for El Paso Transportation Authority, designate the Executive Director as the Accountable Executive and authorize administrative coordination with El Paso County Human Resources regarding conforming updates to the Executive Director's job description.

(Presented by John Andoh, Executive Director)

5.g. Adopt a Public Transportation Agency Safety Plan for El Paso Transportation Authority, designate the Executive Director as the Accountable Executive and authorize administrative coordination with El Paso County Human Resources regarding conforming updates to the Executive Director's job description.

(Presented by John Andoh, Executive Director)

5.h. Adopt a Cybersecurity Policy for El Paso Transportation Authority.

(Presented by John Andoh, Executive Director)

5.i. Authorize the Executive Director to execute an Amendment #4 to the Interlocal Agreement – Project Development Agreement for the El Paso County Transit Facility Project regarding use of additional funds for design and adding El Paso Transportation Authority as a party and recommend approval to El Paso County Commissioners' Court subject to pending to legal review and approval, with the Executive Director authorized to execute the Agreement once finalized.

(Presented by John Andoh, Executive Director)

MOTION: to approve Consent Agenda items 5a through 5i.

Motion; Commissioner Jackie Butler

Seconded; Vice Chair: Arturo Rubio

Motion Carried Unanimously

6. REGULAR AGENDA

6.b. Presentation from Texas A & M Transportation Institute regarding the General Public Demand Response Transit Study and taking action to accept the final report.

(Presented by Kelly Blume, Texas A&M Transportation Institute)

Kelly Blume of the Texas A&M Transportation Institute presented the General Public Demand Response Transit Study and reviewed the proposed service plan approach, including service areas and zones, days and hours of operation, and overall service plan organization. She discussed concepts such as commingled ETA Access zones, existing and potential ETA Andale zones, a user-side subsidy program, and a volunteer driver program, as well as strategies for integrating these components. Ms. Blume also outlined implementation considerations associated with the proposed service plan.

MOTION: to approve GPDRT Final Report.

Motion; Vice Chair: Arturo Rubio

Seconded: Eddie Conde

Motion Carried Unanimously

6.c. Discussion and possible action regarding the Revised Draft Transition Plan.

(Presented by John Andoh, Executive Director)

John Andoh, Executive Director, presented the Revised Draft Transition Plan, describing it as a framework outlining the implications of transitioning operations from El Paso County. The proposed timeline anticipates final separation by September 1, 2026, with ETA becoming a direct recipient of funding. The plan includes proposed agreements with El Paso County for the transfer of assets and for contracted services such as Human Resources and the County Auditor's Office. Mr. Andoh noted that the transition plan addresses policies and procedures, budget and financial planning, interlocal agreements for local match funding, and an inventory of assets, contracts, grants, job descriptions, salaries, fleet and bus stop inventories, and potential policies that may need to be developed. The plan also presents three options for the Board's consideration, with additional details to be discussed in current and upcoming meetings. Mr. Andoh answered questions from Board members and noted that the transition plan will serve as a working document over the next six months and may be amended as needed.

MOTION: to accept Transition Plan Draft.

Motion; Commissioner Jackie Butler

Seconded by: Eddie Conde

Motion Carried Unanimously

6.d. Receive a report from the Executive Director regarding El Paso Transportation Authority staff activities.

(Presented by John Andoh, Executive Director)

NO ACTION – John Andoh, Executive Director, reported on recent staff activities and operational updates, including an increase in ridership following the implementation of free fare service. He noted that ETA received a letter of support from Sun Metro, which will be presented at the next meeting. Mr. Andoh also reported that staff are participating in Metropolitan Planning Organization (MPO) Board of Directors meetings and orientation. He informed the Board that the final design for the maintenance facility will be presented to the El Paso County Commissioners Court and that remaining funding from the right-of-way purchase leaves a shortfall to reach the 60% design threshold; therefore, ETA will request \$165,000 from El Paso County to cover the deficit. Additionally, he stated that the Regional Mobility Authority (RMA) will be invited to provide updates on capital projects to both the ETA Board and the Commissioners Court so both bodies remain informed on project status. No action was taken.

6.e. Receive report of Transdev's operations for the month of January 2026.

(Presented by Sylvia Balcazar, Transdev General Manager)

NO ACTION – Transdev Operations Manager Jennifer Garcia, in the absence of General Manager Sylvia Balcazar, presented the January 2026 operations report. She reported that Transdev participated in a presentation with the El Paso Center for Children regarding the Safe Place program, which would allow buses to serve as safe locations for children and individuals up to age 24 in need of assistance. Operational highlights included zero preventable accidents and one non-preventable accident, 94% on-time performance, 12,454 fixed-route trips (an increase of 1,296 from the previous month), 96 ETA Andale and 122 Andale trips, and 524 to 660 paratransit trips. There are approximately 200 ADA clients within the service area and 17 outside the service area. Ms. Garcia also reported two road calls, 100% completion of preventative maintenance, and that Transdev is fully staffed with drivers. No action was taken.

MOTION: to move into Executive Session.

Motion; Vice Chair: Arturo Rubio

Seconded by: Eddie Conde

Motion Carried Unanimously

7. EXECUTIVE SESSION

The Meeting may be closed under the following Texas Government Code of the Open Meetings Act for discussion as follows:

A. Attorney Consultation Code (§ 551.071)

B. Deliberations Regarding Real Property Code (§ 551.072)

C. Deliberations Regarding Personnel Matters Code (§ 551.074)

D. Deliberations Regarding Security Devices or Security Audit (§ 551.076)

E. Deliberations Regarding Cybersecurity to Protect Critical Infrastructure (§ 551.0761)

(Any final action as a result of this closed discussion will be held at the opening of the meeting or at any subsequent meeting.)

El Paso Area Transportation Services, Local Government Corporation doing business as the El Paso Transportation Authority entered Executive Session at 3:42 p.m.

7.a. Discuss findings regarding persons necessary in the Closed Meeting.
(Presented by John Andoh, Executive Director)

7.b. Discuss El Paso Transportation Authority future staffing with El Paso County Human Resources Department as defined under Section 551.074 – Personnel Matters.
(Presented by John Andoh, Executive Director)

El Paso Area Transportation Services, Local Government Corporation doing business as the El Paso Transportation Authority ended Executive Session at 4:57p.m.

8. REGULAR AGENDA CONTINUED

8.a. Consider and take action on matters discussed in closed session.

Based on discussions during executive session, Mr. Andoh is requesting authorization to begin working on

8.b. Authorize the Executive Director to develop a Personnel Merit System for the El Paso Transportation Authority, which includes, but not limited to the development of Personnel Policy and Procedures, an Employee Handbook for presentation and possible action by the Board of Directors at a future meeting.
(Presented by John Andoh, Executive Director)

Based on discussions held during the Executive Session, John Andoh, Executive Director, requested authorization from the Board to begin developing a Personnel Merit System for the El Paso Transportation Authority (ETA). The proposed system would include, but not be limited to, the creation of Personnel Policies and Procedures and the development of a comprehensive Employee Handbook. The purpose of this initiative is to establish a formal framework for employee performance, recognition, and accountability, ensuring consistency and transparency in personnel management. Upon completion, the Personnel Merit System and associated materials would be presented to the Board of Directors for review and possible action at a future meeting.

MOTION: to authorize John Andoh, Executive Director to begin working on the development of Personnel Policies and Procedures, and an Employee Handbook for presentation at a future meeting.

Motion; Vice Chair: Arturo Rubio

Seconded by: Eddie Conde

Motion Carried Unanimously

8.c. Adopt El Paso County's job descriptions and pay scale for use by the El Paso Transportation Authority as defined in the Transition Plan.
(Presented by John Andoh, Executive Director)

John Andoh, Executive Director, presented for Board consideration the adoption of El Paso County's job descriptions and pay scale for use by the El Paso Transportation Authority, as outlined in the Transition Plan. This action would establish consistency in employee roles, responsibilities, and compensation as ETA transitions to independent operations. The Board was asked to review and approve the adoption to ensure alignment with the proposed personnel framework.

MOTION: authorize John Andoh, Executive Director to adopt El Paso County's job descriptions and pay scale for use by the El Paso Transportation Authority.

Motion; Vice Chair: Arturo Rubio

Seconded by: Eddie Conde

Motion Carried Unanimously

9. ADJOURNMENT

MOTION: to adjourn meeting.

Motion by: Eddie Conde

Seconded; Vice Chair: Arturo Rubio

Motion Carried Unanimously

Meeting adjourned at 5:02 PM.

Appendix B - Transit Operations Contractor Safety Policies and Procedures



Transdev Services, Inc. Safety Policies and Procedures



Our Credo:
**Uncompromising
Safety**

Transdev Services, Inc. Safety Policies and Procedures

Background: Transdev is committed to leading the way to creating and maintaining a superior safety culture, through the dedicated efforts of every team member throughout our entire company, we will become known as the safest passenger transportation service.

Transdev will keep its employees, customers and surrounding public safe at all times. Given the risks involved with daily operations, Transdev seeks to implement a uniform, comprehensive set of safety policies and procedures to assist each employee in reducing the risk of collision, injury or other harm. These policies and procedures consist of a set of minimum standards, or operating procedures, to be implemented at every Transdev location.

Purpose: The purpose of the Transdev Policies and Procedures is to establish minimum standards of conduct, monitoring methods and reporting and record keeping requirements and communicate how Transdev and its employees will comply with or exceed applicable safety regulations. In some cases, the provisions of these policies and procedures require Transdev employees to meet higher performance standards than what are established by federal or state regulation. In doing so, Transdev is able to create an enhanced margin of safety for our employees, customers, and the communities we serve.

Scope: The Policies and Procedures apply to all Transdev North America employees. Specific sections are applicable only to employees in safety-sensitive positions or with driving responsibilities, as well as independent contractors contracting with Transdev, and are noted accordingly.

Accountability: Transdev Policies and Procedures are “work rules” under existing labor agreements. Violation of any element may result in discipline up to and including termination. The Policies and Procedures contained in this manual supersede all prior safety policies and procedures. These provisions do not constitute an employment contract, supersede or contradict any active collective bargaining agreement or create any contractual third-party beneficiary. Supervisors and Managers are required to follow these written standards at all times, and to familiarize all employees under their supervision with the policies and procedures in this manual. A copy of this manual shall be readily available to all employees and stored in a common location for frequent and easy reference.

The safety policies and procedures were created by Transdev as a simple method for conveying the importance and excellence of our safety policies and procedures. The safety policies and procedures should be posted at each operating location. Employees or Supervisors requesting clarification on safety policies and procedures should refer to these policies and procedures for detailed information.

Safety Policies and Procedures

Transdev is committed to being known as the safest passenger transportation company in the world. Through the dedicated efforts of every team member throughout our entire company, we will be known as the safest passenger transportation company in the world. The following principles are the foundation for Transdev:

I. GENERAL SAFETY

Transdev provides a safe environment for all employees, customers and the community.

We comply with all applicable federal, state, and local health and safety regulations and set high performance expectations to further enhance safety.

Safety Committees at each operating location meet regularly for the purpose of proactively reducing accidents and injuries. The Committees promote ongoing safety awareness and employee involvement, solicit feedback and suggestions and make recommendations to management regarding preventative and corrective actions.

II. SELECTION AND RETENTION

Transdev incorporates safety into each stage of the employee selection and hiring process.

An applicant's firm commitment to safety is a condition of employment at Transdev.

We verify employment history, collect reference information, screen motor vehicle records, conduct drug and alcohol testing, physical exams, criminal background checks and structured interviews.

Employees comply with our policy on preventable accidents and traffic violations, verified through annual MVR checks. Employees adhere to our Substance Abuse policy, undergo physical exams every two years, criminal background checks every four years, and report to work fit for duty.

III. EDUCATION AND TRAINING

Transdev provides thorough, relevant and ongoing education and training for all employees to ensure that assigned duties are completed safely and effectively.

New employee, new operator and behind-the-wheel training programs are based on strict requirements and national standards designed to promote learning and skill mastery.

Refresher and in-service training is provided when new duties or processes are introduced, and following accidents or the identification of potential hazards.

IV. PERFORMANCE EVALUATION

Transdev observes and evaluates the safety performance of all employees, and provides meaningful feedback and re-establishes expectations for improvement when performance standards are compromised.

Unsafe behaviors are immediately corrected to prevent accidents, injuries and near misses. Employees in driving positions are monitored through on-board and trail check evaluations as well as a regular review of SmartDrive incidents.

V. PRINCIPLES OF SAFE DRIVING

Transdev actively enforces safe driving and operating practices at all times. Operators are trained to drive safely and defensively and in a manner that prevents accidents, injuries and property damage.

Employees conduct thorough pre- and post-trip inspections, follow defensive driving and maneuvering procedures, properly start, stop and secure the vehicle and consider passenger safety a primary concern at all times, especially when responding to ADA requirements, loading/unloading and handling mechanical road failures.

VI. ACCIDENT AND INJURY INVESTIGATIONS

Transdev conducts prompt, accurate and thorough investigations of all accidents, injuries, illnesses and near misses, with the goal of promoting safety and preventing reoccurrences.

An **accident** is defined as follows:

When any part of a vehicle other than the bottom surface of the tires come in contact with anything other than the top surface of the roadway resulting in death, bodily injury, property damage or physical damage or impact, regardless of the nature, extent, or dollar amount (i.e., \$1 or more) of injury or damage. A dent, scratch, chip, etc., would result in \$1 or more of damage even though the damage may not be repaired.

Preventable Collision: A motor vehicle collision, in which the Operator did not do everything reasonable to avoid a collision, committed an error or failed to react to the errors of others.

Non-Preventable Collision: A motor vehicle collision, in which the Operator committed no driving error and reacted reasonably to the errors of others.

Preventable Passenger Injury: A passenger injury in which the Operator failed to do everything reasonable to prevent the injury including committing an error or failing to react to the errors of others. Passenger injuries in any type of vehicle are preventable when they are caused by faulty operation of the vehicle and improper wheelchair tie downs. If a passenger injury is caused by the following situations it will be deemed preventable; when a driver stops, turns, accelerates, or decelerates abruptly. Emergency action by the company driver to avoid a collision that results in a passenger injury should be checked to determine if proper driving prior to the emergency would have eliminated the need for the evasive maneuver.

A work-related injury or illness is defined as a personal injury or illness sustained by an employee through his or her role as an employee. The injury or illness must arise out of the employee's job duties or out of a relationship with his or her work.

Preventable employee injury: When the employee failed to do everything possible to prevent the injury.

All accidents and injuries are investigated to determine the cause(s).

Injured employees, who are eligible, are offered modified duty while they recover.

Employees are subject to strict standards of accident preventability, undergo post-accident drug or alcohol testing in accordance with DOT requirements and participate in post-accident training to correct unsafe driving behaviors. Employees that do not report an accident immediately will be subject to disciplinary action up to and including termination.

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SPP FORMS

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SPP B.22a	Prescription Medication Notification
SPP B.22b	Notification of Drug/Alcohol Testing
SPP B.22c	Reasonable Suspicion Supervisor's Evaluation

C. TRAINING AND EDUCATION FORMS

SPP C.2a	Score Sheets
SPP C.2b	Pre-Service/BTW Form
SPP C.4	Operator Evaluation
SPP C.5	Trail Check Form

D. PERFORMANCE EVALUATION FORMS

SPP D.2	Facility Inspection Worksheet
SPP D.3a	Instructor Performance Review
SPP D.3b	Instructor Evaluation
SPP D.6	SmartDrive Event Review

E. PRINCIPLES OF SAFE DRIVING FORMS

SPP E.10a	Daily Vehicle Inspection Report
SPP E.10b	Daily Vehicle Inspection Report (Paratransit)

F. ACCIDENT AND INJURY INVESTIGATION FORMS

SPP F.3	Post-Accident Retraining Form
SPP F.4	Post-Accident Drug and Alcohol Testing Decision Maker Form
SPP F.6a	Employee's Report of Work Injury
SPP F.6b	Employee Injury Investigation
SPP F.7	Supervisor's Investigation Report
SPP F.8	Operator Incident Report
SPP F.12	Modified Work Letter and Schedule
SPP F.13	Accident Involvement Seating Diagram
SPP F.14	Comment Card
SPP F.20	Vehicle Accident Report

A. General Safety

It is the policy of Transdev to provide a safe environment for all employees, customers and the community.

It is the policy of Transdev to adhere to the following safety requirements:

A.1 Transdev will comply with all applicable federal, state, and local health and safety regulations and set higher performance expectations for Transdev employees as appropriate to enhance the safety of employees, customers, and the general public.

- Applicable federal regulations include, but are not limited to, the following agencies:
 - (a) The U.S. Department of Transportation (DOT)
 - (b) The Federal Transit Administration (FTA)
 - (c) The Federal Motor Carrier Safety Administration (FMCSA)
 - (d) The Occupational Safety and Health Administration (OSHA)
 - (e) Office of Workers' Compensation Programs (OWCP)
- In the case of discrepancies between Transdev Policies and Procedures and federal, state or local requirements, the stricter standard shall apply.

A.2 Transdev will provide a safe working environment for employees, taking all reasonable steps to maintain safe, healthy and clean working conditions that will eliminate or minimize accidents and health hazards.

- Transdev will follow all applicable OSHA and similar state and local requirements, including but not limited to:
 - (a) Personal Protective Equipment
 - (b) Hazard Communication
 - (c) Emergency Action Plans
 - (d) Blood borne Pathogens
 - (e) Lockout/Tag out
 - (f) Recordkeeping
 - (g) Job Hazard Assessments

For further information on applicable state and federal standards, please see your Region Director of Safety and or Regional Director of Maintenance.

A.3 Transdev will take practical and reasonable steps to safeguard employees, passengers on vehicles and the surrounding public from accidents and injuries.

- Proper safety training will be provided to all employees responsible for the operation of company vehicles.
- Transdev will ensure that employees operating public vehicles will successfully complete required training program and have successfully completed a final driving evaluation before being released to service.

- Supervisors will monitor employees and provide ongoing safety training to ensure a commitment to safety and accident prevention.

A.4 Prompt and accurate investigations of all accidents and injuries will be conducted to determine the root cause and to prevent reoccurrences.

- All incidents resulting in personal injury or property damage, no matter how slight, will be investigated and documented.
- Formal training in accident prevention and emergency procedures will be provided to all employees in safety-sensitive positions and documented to the employee's training file.
- Formal training in accident investigation and reporting procedures will be provided to employees responsible for accident follow-up activities and documented to the employee's training file.

A.5 Transdev will recognize and instill in its workforce the concept that safety is a shared responsibility of all employees.

- Supervisors and Managers will encourage employees to exercise caution at all times, use all available safeguards and safety equipment, demonstrate behaviors that proactively prevent accidents and injuries, and comply with all rules, regulations, policies and procedures.
- No Supervisor or Manager will knowingly tolerate or permit any unsafe act, operation, practice or behavior.
- Supervisors and Managers are required to facilitate programs, meetings, inspections and investigations within his/her designated area are carried out according to these policies and procedures.
- Supervisors and Managers will consistently and constantly promote Transdev World Class Safety Policies and Procedures, and set an example for employees by always demonstrating proper safe behaviors.
- Employees will immediately report any unsafe conditions or incidents to their Supervisor/Manager and are encouraged to make suggestions for improved safety performance and conditions.
- Periodic safety training will be provided to employees to prepare them to perform their jobs according to the Transdev World Class Safety Policies and Procedures.
- Employees and a member of management will be required to attend and actively participate in all quarterly safety meetings.
- Employees will be held responsible for adhering to property safety rules.

A.6 Transdev will establish a Safety Committee at each operating location which shall meet monthly for the purpose of proactively reducing accidents and injuries.

- The Safety Committee may be comprised of at least four (4) members, and may include the Operations/Maintenance Manager, Operators, and Maintenance or Dispatch personnel (Properties with a Collective Bargaining Agreement please refer to appropriate article).
- The Safety and Training Manager will serve as the Committee Chair.
- Committee members will serve for a minimum of six (6) month terms.
- Committee members will be chosen based on their safety record, attendance record, safety knowledge, leadership skills, overall safety attitude and willingness to help and contribute to the activities of the committee.
- One (1) member will be appointed to record meeting minutes, which will be given to the Safety and Training Manager to identify relevant points to be discussed and reviewed with all employees.
- The names of Safety Committee members will be communicated to all employees and will be easily identifiable through some aspect of uniform or bulletin board posting.
- Safety Committee members will be provided with the proper training in order to be effective in promoting safety initiatives.
- Safety Committee meeting minutes will be documented and posted promptly after each session.

Purpose of the Safety Committee

- Review accidents and incidents to identify preventative measures and recommend solutions to prevent accident and injury recurrences.
- Conduct regular safety inspections of the facility and identify any physical hazards.
- Detect and eliminate unsafe conditions or practices not in compliance with the Transdev Policies and Procedures.
- Promote safety awareness and employee involvement through incentive programs, safety communication programs, and recognition of safety accomplishments.
- Solicit feedback and suggestions from employees.

- The Committee may be requested to evaluate specific frequent accident and injury events in order to recommend remedies, policies or practices, which will curb the unsafe conditions causing such accidents or injuries.

A.7 Transdev designates the Operational Chain of Command working in concert with Regional Safety Directors as having responsibility to effectively implement, monitor, and enforce these written policies and procedures.

- The Regional Safety Directors, along with field input, will review the existing policies and procedures on an annual basis or as needed to ensure that they are comprehensive and up-to-date.
- Safety standards will be monitored and measured on an ongoing basis in order to identify and correct unsafe behaviors or conditions.
- Regional Safety Directors shall prepare and review monthly safety reports and circulate the reports throughout the organization as directed by the Vice President for Safety.

A.8 Transdev will enforce and reinforce the elements of these written Policies and Procedures consistently, thereby supporting Transdev's commitment to safety.

- Each Supervisor/Manager will be provided a copy of the Transdev Safety Policies and Procedures, and each is responsible for following them at all times.
- During new employee orientation and safety meetings, Supervisors and Managers will review these policies and procedures and will take an active role in familiarizing employees with these standards on an ongoing basis.
- Supervisors and Managers will answer any questions and provide explanations to employees regarding these policies and procedures.
- Following employee review, Supervisors and Managers will require each employee to sign and date a "Transdev Policies and Procedures Acknowledgement" form. Supervisors/Managers will sign and date this form, provide a copy to the employee, and keep the original in the employee's personnel file.

B. Selection and Retention Policy

It is the Policy of Transdev to incorporate safety into each stage of the employee selection and retention process. Commitment to safety is a condition of employment at Transdev.

Hiring Managers or those individuals with the responsibility of selecting and hiring new employees will adhere to these standards without exceptions, unless indicated in the applicable Procedures.

Transdev is committed to providing equal employment opportunities. Human Resource decisions and actions will be conducted without regard to gender, sexual orientation, race, color, age, national origin, ancestry, disability, Veteran status, religion, creed or other condition in accordance with applicable laws.

Minimum Operator/Driver Qualifications

The following minimum qualifications refer to individuals applying for driving positions at Transdev. To be considered for employment, candidates applying for driving positions will meet the following minimum qualifications:

Driving Record

An applicant may be disqualified if he/she:

- Is less than twenty-one (21) years of age
- Does not possess a valid driver's license in their state of residence
- Cannot obtain a commercial drivers' license if applicable
- Cannot satisfy state or federal law, local ordinance and statutes regarding the requirements to operate a commercial vehicle
- Has more than two (2) minor moving violations within the previous 36 months
- Has more than one serious traffic violation within the last three (3) years
 - This includes, excessive speed, reckless driving, improper or erratic lane changes, and following the vehicle ahead too closely
- Has been convicted of a traffic offense(s) in connection with a fatal traffic accident within the last five (5) years
- Has been convicted of driving under the influence of a controlled substance or alcohol within the last three (3) years
- Has been convicted for leaving the scene of an accident within the last three (3) years
- Has been convicted for using a commercial vehicle to commit a felony within the last three (3) years
- Has been convicted of using a vehicle to manufacture, distribute, or dispense a controlled substance within the last 7 years
- Is disqualified from holding a commercial driver's license
- Has been convicted of more than one of the following over the driver's entire driving history:
 - Being under the influence of alcohol as prescribed by State law
 - Being under the influence of a controlled substance
 - Having an alcohol concentration of 0.04 or greater while operating a commercial motor vehicle
 - Refusing to take an alcohol test as required by a State or jurisdiction under its implied consent laws or regulations
 - Leaving the scene of an accident
 - Using a vehicle to commit any felony
 - Driving a commercial motor vehicle when, as a result of prior violations committed operating a commercial motor vehicle, the driver's commercial drivers license is revoked, suspended, or cancelled
 - Causing a fatality through the negligent operation of a commercial motor vehicle, including, but not limited to, crimes of motor vehicle manslaughter, homicide by motor vehicle and negligent homicide

- Cannot present a state MVR report verifying applicants' driving history and status for the last three (3) years. For drivers with no previous experience working for a DOT regulated employer during the preceding three years, documentation that no investigation was possible must be placed in the Operator's qualification file within the required 30 days of the date the Operator's employment begins.

Education

- See applicable job description.

Criminal Background

An applicant will not be denied employment solely due to conviction for a criminal offense. The type of offense, the date and the relevance of the criminal conviction to the position applied will be considered in the employment decision.

B.1 A photocopy of the applicant's current driver's license must be kept in the driver qualification file at all times.

B.2 Applicants must complete and sign a Transdev Employment Application in its entirety.

- Application will be reviewed for accuracy, completeness and signature.
- An unjustified refusal to supply requested information or a falsification of information will result in elimination of the individual from consideration for employment.
- Any changes or additions to the application after the original completion date will be initialed and dated by the applicant.

B.3 Applicants must provide a complete and verifiable employment history for the past 10 years. Reasonable efforts will be made to verify the most recent 3 years of employment history.

- Employment history will be verified to the extent possible prior to an offer of employment.
- Any gaps in employment or lack of a 10-year employment history will be explained and documented by the applicant on the application.
- An investigation of the driver's safety performance history will be conducted with Department of Transportation-regulated employers during the preceding three (3) years.
- References will be asked a standard set of job-related questions for all applicants using the Reference Verification form (SPP B.3).
- Applicants and employment references will be treated fairly and consistently.

- All reference information will be documented, including a list of references who were contacted and the information received.

B.4 Applicants must present an original Motor Vehicle Record (MVR) issued within the last 30 days and according to company, state and contract requirements. Applicants for Operator positions must meet the standards set forth under Minimum Operator/Driver Qualifications above:

- Transdev will review the existence of any criminal violations or convictions and may deny employment based on a violation, conviction, or pattern of violations/convictions indicating safety risk.
- Original MVRs must be obtained before the employment application is acted upon.
- Copies of MVRs will not be accepted.
- Certain locations may obtain MVRs through the appropriate background check vendor, given that the MVR meets company, state and contract requirements.
- Under no circumstances shall an applicant be hired, given a road test, placed in training, or be allowed to drive a company vehicle without an MVR in compliance with this policy.
- Applicants who fail to authorize an MVR check will not be considered for employment.
- Violations that occur during the applicant's personal time are considered as part of the overall driving record.

B.5 Applicants must undergo and pass a pre-employment drug test by a company-approved physician/facility. Applicants must also provide authorization to receive clearance from prior DOT employers. Specific directives are provided in the Transdev Substance Abuse Policy.

B.6 Applicants must review the job description for the job being applied for. Applicants must be physically able to safely use each piece of equipment necessary to perform assigned duties with or without reasonable accommodation.

Special Note: Applicants may be asked whether they are capable of performing the essential functions of the job with or without reasonable accommodations, but may not be asked any questions regarding real or perceived disabilities.

- CDL holders must receive a DOT-level physical exam and present a copy of their DOT card.
- A company appointed physician/facility would perform the physical.

- As of May 21, 2014 drivers will be required to obtain their FMCSA medical examination from a certified medical examiner that is listed on the National Registry.

B.7 Applicants must pass a criminal background check as required and/or permitted by federal and state law.

Applicants must consent to a background check using the appropriate Background Check Release form.

An applicant will not be denied employment solely on the grounds of a conviction for a criminal offense. The type of offense, the date and the relevance of the criminal conviction to the position applied will be considered in the employment decision.

The following records of criminal convictions will be considered within the period permitted by applicable state law:

- (a) Felonies and misdemeanors
- (b) Drug possession or use
- (c) Drug trafficking or manufacturing
- (d) Crime of violence against another person(s)
- (e) A pattern of illegal activities
- (f) Sexual related offense
- (g) Any other conviction that may present a safety or security risk

Any background check or application that shows a conviction must be referred to and approved by the Regional Director of Human Resources before the applicant is hired.

B.8 Applicants must complete a structured and documented employment interview. Structured interviews are important to avoid differential treatment during the interview process. For specific information, contact corporate recruiting.

B.9 Applicants must complete all additional forms required by Human Resources. This includes all forms required by company policy and applicable law.

B.10 Applicant information must be recorded for every employment application received by the company.

Minimum Qualifications for Non-Driving Positions

The following minimum qualifications refer to individuals applying for positions at Transdev that do not involve operation of a revenue service vehicle. The following qualifications do not apply to those applying for senior or executive-level positions.

To be considered for employment, applicants will adhere to the following minimum qualifications:

B.11 Applicants for non-driving positions must complete and sign a Transdev Employment Application in its entirety.

- Application will be reviewed for accuracy, completeness and signature.

- An unjustified refusal to supply requested information or a falsification of information will result in elimination of the individual from consideration for employment.
- Any changes or additions to the application after the original completion date will be initialed and dated by the applicant.

B.12 Applicants for non-driving positions must provide a complete employment history for the past 10 years. Reasonable efforts must be made to verify the most recent 3 years of employment history.

- Employment history will be verified to the extent possible with all employers listed on the application prior to an offer of employment.
- Any gaps in employment or lack of a 10-year employment history will be explained and documented by the applicant on the application.
- All reference information will be documented, including a list of references that were contacted and the information received.

B.13 Applicants for non-driving positions must pass a pre-employment drug test by a company-approved physician/facility. Specific directives are provided in the Transdev Substance Abuse Policy.

B.14 Applicants for non-driving positions must review the job description for the job being applied for. All Applicants must be physically able to safely use each piece of equipment necessary to perform assigned duties with or without reasonable accommodation.

Special Note: Applicants may be asked whether they are capable of performing the essential functions of the job with or without reasonable accommodations, but may not be asked any questions regarding real or perceived disabilities.

- All Employees must pass physical examinations as required by federal and state laws and Company/client policy, or every two (2) years whichever comes first, including the following positions: Mechanics, Fuelers, Service worker and Non-CDL Operators.
- A company appointed physician/facility would perform the physical.

B.15 Applicants for non-driving positions must pass a criminal background check as required and/or permitted by federal and state law.

- All Applicants must consent to a background check using the appropriate Background Check Release form.

An applicant will not be denied employment solely due to conviction for a criminal offense. The type of offense, the date and the relevance of the criminal conviction to

the position applied may be considered in the employment decision.

The following records of criminal convictions will be considered within the period permitted by applicable state law:

- (a) Felony and misdemeanor
- (b) Drug possession or use
- (c) Drug trafficking or manufacturing
- (d) Crime of violence against another person(s)
- (e) A pattern of illegal activities
- (f) Sexual related offense
- (g) Any other conviction that may present a safety or security risk

Any background check or application that shows a conviction will be referred to and approved by the Regional Director of Human Resources before the applicant is hired.

- B.16 Applicants for non-driving positions must complete a structured and documented employment interview. Structured interviews are important to avoid differential treatment during the interview process. For specific information, contact corporate recruiting.**
- B.17 Applicants for non-driving positions must complete all additional forms required by Human Resources. This includes all forms required by company policy or applicable law.**
- B.18 All Applicants information must be recorded on the Applicant Log for every employment application received by the company.**

Safety Requirements for Continued Employment

The following requirements refer to employees in safety-sensitive positions, particularly those hired as Operators/Drivers at Transdev. The Transdev Substance Abuse Policy applies to all employees who perform a safety-sensitive function.

To be considered for continued employment, employees operating a motor vehicle must adhere to the following:

- B.19 Employees will undergo an annual review of their driving record and complete an Annual Review of Driving Record and Certification of Violations (SPP B.19) if responsible for operating a motor vehicle in the course of their employment. MVR checks must be conducted and based on the following requirements:**
 - Employees must undergo an annual review of their driving record, or more frequently as mandated by client requirements.
 - As required by state law or regulations, authorizations to obtain MVRs will be obtained from employees.
 - Failure to authorize an MVR check is cause for dismissal.

- Employees will meet the following MVR and company standards regarding traffic violations:
 - (a) No homicide, manslaughter, or assault convictions associated with operation of a motor vehicle
 - (b) No convictions for driving while intoxicated
 - (c) No more than two (2) minor moving violations within the previous 36 rolling months.
 - (d) No major moving violations, including but not limited to:
 - failure to stop at the scene of an accident; speeding 30 mph or more above the posted speed limit; driving with a revoked license; possession of opened alcoholic containers; attempting to elude an officer.

When the employee is charged with a crime, Transdev will have the right to suspend the employee without pay, pending the court's finding of guilt or innocence. A conviction or disposition other than a finding of not guilty or dismissal of charges, depending on the court finding, circumstances of the incident leading to the offense(s) charged, and the relevance of either to the position, may result in termination.

- A Supervisor or Manager may request an MVR from an approved source when he/she has reason to believe the employee's driving record may not meet company standards.
- Violations that occur on an employee's personal time or in a non-company vehicle are considered as part of the overall driving record.
- Annual MVRs will be reviewed, signed, and dated by a management designee.

B.20 Employees must report any traffic citations, violations or convictions when they occur, including those received outside the course of employment.

- Employees must provide notice to their Supervisors regarding traffic citations, violations or convictions within 24 hours of their occurrence.
- Employees no longer meeting the minimum MVR and company standards as outlined in Section B.20 and B.21 will be terminated.

B.21 Employees must comply with the standards for preventable accidents and moving violations in company vehicles.

- Operators with three (3) preventable accidents involving a company vehicle in the previous 24 months will be terminated.
- All moving violations or accidents in a company vehicle will be reviewed by management and may result in disciplinary action up to and including termination.

B.22 Employees must comply with Transdev's Substance Abuse Policy. Specific directives are provided in the Transdev Substance Abuse Policy.

B.23 Employees must pass physical examinations as required by federal and state laws and Company/client policy, or every two (2) years whichever comes first, including the following positions: CDL Operators, Mechanics, Fuelers, Service Workers and Non-CDL Operators.

- Employees with a break in service of 30 days or less with a valid medical card or examination certificate are not required to undergo a physical examination unless circumstances indicate the employee may not be fit for duty.
- Employees will undergo a physical examination if the Company has a reasonable basis to suspect the employee may have a safety-related health condition.

B.24 Employees must undergo a criminal background check every four (4) years after the date of hire.

- Employees are required to report any arrest or conviction within 24 hours of the event.

When the employee is charged with a crime, Transdev will have the right to suspend the employee without pay, pending the court's determination of guilt.

Conviction depending on the nature and the relevance to the position may result in termination.

B.25 Employees must report to work being "fit for duty," as outlined by the Federal Motor Carrier Safety Administration (FMCSA), including but not limited to:

- (a) Not being under the influence of prescription or non-prescription medication that may interfere with safe driving
- (b) Not being in violation of federal or state hours of service regulations

B.26 Safety Requirements for Rehired and Return to Work Employees

All employees rehired or returning from work from a leave of absence for safety sensitive and driving positions must complete the required training hours as outlined by the Transdev rehire criteria.

Transdev Training Matrix

Separation Period →	< 30 Days	31-90 Days	91-180 Days	180-270 Days	270-360 Days
Diagnostic Evaluation (SPP C.4)	YES	YES	YES	YES	YES
Classroom Training (ODP subjects)	YES (As needed per Safety Manager)	YES Basic	YES Basic	YES Basic	YES Advanced
Closed Course Skills/BTW Hours	As needed based on diagnostic evaluation	As needed based on diagnostic evaluation At least 8	8	16	32
Full ODP Training Program	N/A	N/A	N/A	NO	YES
Satisfactory Evaluation (SPP C.4)	YES	YES	YES	YES	YES
Classroom Hours	Missed SOPs or monthly training topics	8.2	8.2	16	40
Recommended Minimum Total Hours	2-4	8+	16	32	72

Training Topics (ODP based) for classroom:

All employees rehired after 360 days must complete the full ODP training program.

Basic Level

Introduction to Professional Driving	60 Minutes
Blood borne Pathogens	20 Minutes
Introduction to the Bus	30 Minutes
Mirror Adjustments and Reference Points	30 Minutes
Preventing Backing Accidents	30 Minutes
Intersections	30 Minutes
Creating a Drug Free and Alcohol Free Workplace	120 Minutes
Safety Best Practices	90 Minutes
LLLC Defensive Driving	90 Minutes

Advanced Level

Full ODP-classroom subjects to include property and client-specific standard operating procedures.

C. Training and Education Policy

It is the policy of Transdev to provide thorough, relevant and ongoing training for all employees to ensure that assigned duties are completed safely and effectively.

C.1 Employees must actively participate in new employee training relevant to the specific job being performed.

- Training curriculum must be based on federal, state, local, company and contract requirements, incorporating national standards when applicable.
- Employees must be trained for all assigned tasks and equipment used on the job.
- Employees must complete all required hours of each training program.
- Employee performance must be evaluated and documented upon completion of each training objective.
- Employees must complete a final written exam upon completion of each training program.
- Training curriculum must be linked to the performance objectives for which employees will be evaluated while on the job.

C.2 New Operators must complete all required hours of New Operator Training, including both Classroom and Behind-the-Wheel (BTW) hours.

- New Operator curriculum must be based on national training standards, incorporating all federal, state, local, company and contract requirements.
- The classroom-training curriculum must consist, at a minimum, of 40 hours as outlined by the Transdev Operator Development Program. Classroom activities must be documented and provide the following details:
 - Course Description
 - Length of Time
 - Instructor Signature
 - Student Signature
- The behind the wheel training curriculum must consist, at a minimum, of 80 hours of driving time as outlined by the Transdev Operator Development Program. BTW hours are defined as actual driving hours behind the wheel, or “hands on the wheel time.” BTW activities must be documented on the following Operator Development Forms:
 - Skills Course Maneuvering Form
 - Basic Safe Driving Form
 - Route and Revenue Form
 - Master Performance Chart

- New Operators must be evaluated after completion of each Classroom and Behind-the-Wheel (BTW) training module.
- Make-up driving or classroom sessions must be provided for employees who are absent or short on hour requirements.
- Operators must complete a final written exam upon completion of New Operator Training.
- New Employees must receive a BTW evaluation within 30 days of being released to revenue service
- Training progress and verification of program completion must be documented and kept in the employee's file.
- Supervisors or Managers will not authorize or instruct any Operator to operate vehicles for which the Operator has not received proper training.

C.3 Transdev New Operator Training programs must be implemented in a standardized format across all locations.

- Supervisors must ensure that training curriculum meets all required hours as mandated by specific client, state, local or contractual requirements.
- Supervisors must ensure that all Instructors have access to standardized training materials in order to teach key subject areas appropriately.
- Training curriculum must be reviewed and evaluated annually to ensure that training content is relevant, appropriate and up-to-date.

C.4 Operators must successfully pass on-board evaluations at the end of the training process and before being released to revenue service.

- Supervisors or other qualified personnel must board the bus and observe the Operator while operating the vehicle.
- Operator Evaluation forms (SPP C.4) must be completed and kept in the Operator's file.
- Supervisors or other qualified personnel must conduct an additional evaluation within 30 days after release into the field for all new Operators.

C.5 Employees must actively participate in refresher training or in-service education programs when new equipment, duties, tasks, systems or processes are added or introduced as a part of job requirements, including but not limited to:

- (a) Vehicles, equipment, machinery or tools
- (b) Chemicals or materials
- (c) Laws, regulations, standards, policies or procedures

- (d) Transfer to a new job
- (e) Leave of absence
- (f) Special circumstances or conditions requiring additional training

- Supervisors must coordinate refresher training for employees based on current operating trends. Refresher training should be used for accident prevention and trend reversal.
- Supervisors must ensure that refresher training is provided annually for each employee based on state and contract requirements.
- Supervisors must inform employees when in-service training is required, and provide information regarding the date and time of training.
- Employees who refuse to comply with refresher or in-service training requirements will be subject to disciplinary action.

C.6 Employees must attend and participate in mandatory, quarterly safety meetings.

- A Safety Manager or Supervisor must inform employees of the date and time of safety meetings.
- A Safety Manager or Supervisor must arrange for make-up meetings in the event that an employee is absent from a safety meeting.
- A Safety Manager or Supervisor must ensure that employees have access to and check bulletin boards, orders and safety notices on a daily basis.
- Employees that fail to attend safety meetings without a written excuse will be subject to progressive disciplinary action.

C.7 Employees responsible for operating a vehicle must actively participate in post-accident training following a preventable accident.

- Post-accident training content will be based on the cause(s) of the accident.
- Operators must complete post-accident training prior to returning to driving duties.
- A satisfactory Final BTW Evaluation (SPP 3.4) must be completed before returning to revenue service.
- Operator performance must be documented and kept on file, showing that the Operator re-mastered the learning points/driving skills associated with the accident.

Transdev Instructor Qualifications:

C.8 Training Instructors must meet all federal, state and local employment requirements and be approved by Management.

- To be considered and to remain a Classroom Instructor for New Operator Training, Instructors must meet the following minimum qualifications:
 - (a) Successful completion of the entire New Operator Training program that he/she will be teaching
 - (b) Have at least two (2) years experience in a transit/Operator position.
 - (c) Satisfactory attendance record
 - (d) Excellent customer service record
 - (e) No preventable motor vehicle accidents within the previous two (2) years
 - (f) No preventable work related injuries within the previous two (2) years
- To be considered and to remain a Behind-the-Wheel Trainer for New Operator Training, the following minimum qualifications must be met:
 - (a) Successful completion of the entire New Operator Training program
 - (b) Successful completion of all BTW evaluations that he/she will be implementing as part of BTW training
 - (c) Have at least one (1) year experience in a transit/Operator position.
 - (d) Satisfactory attendance record
 - (e) Excellent customer service record
 - (f) No preventable motor vehicle accidents within the previous two (2) years
 - (g) No preventable work related injuries within the previous two (2) years
- Supervisors and Managers must evaluate both minimum and overall qualifications of Instructors. Additional Instructor characteristics must be considered, including but not limited to the following:
 - (a) Demonstration of Transdev's commitment to safety
 - (b) Adherence to Transdev Policies and Procedures
 - (c) Verbal and written communication skills
 - (c) A positive and helpful attitude
 - (d) Leadership skills
 - (e) Teamwork
 - (f) Professional appearance
 - (g) Willingness to work a flexible work schedule or extra hours as needed

C.9 Instructors must be provided with proper training, including various aspects of effective teaching practices.

- Instructors will be trained to deliver training content in a consistent and standardized manner, adhering to the Transdev Training Program curriculum.
- Instructors will be trained to answer questions and explain concepts to employees who require additional attention or assistance.
- Instructors will be trained to objectively evaluate and document employee performance and keep detailed records.

D. PERFORMANCE EVALUATION POLICY

It is the policy of Transdev to continuously observe and evaluate the safety performance of its employees, and to provide feedback and expectations for improvement (including discipline) when performance standards are compromised.

D.1 Supervisors must evaluate employee performance on a regular basis to identify both superior and unsatisfactory behaviors when they occur.

Supervisors will review safety behaviors regularly and act on them accordingly. Negative trends will be identified and included as part of future training content or safety meetings.

- Supervisors will conduct a thorough investigation of all customer service issues and complaints when they occur.
- Supervisors will document all major safety violations and interactions with the employee regarding the unsafe behavior.
- Feedback or corrections to behavior will not occur while the employee is performing job duties, unless there is a situation where behavior will be corrected immediately in order to prevent hazardous operation.
- Supervisors should acknowledge superior behaviors as soon as possible after the behavior or incident.

D.2 Supervisors and Managers must conduct monthly scheduled facility inspections of all maintenance, grounds, terminals and office areas. Facility inspections may be completed in conjunction with Safety Committee inspections.

- Supervisors will assign designated maintenance personnel to conduct a monthly inspection of fire extinguishers, emergency exits, emergency lighting, fire suppression systems, adherence to “no smoking” policies, and proper storage of flammables in the shop.
- Supervisors or designated personnel will document all facility inspections using the Facility Inspection Worksheet (SPP D.2).
- Local Maintenance Managers will perform monthly Maintenance Manager property inspections and retain documentation in the Maintenance office.

Performance Evaluation Specific to Operators/Drivers:

D.3 Classroom and Road Instructors must meet and consistently maintain strict standards of performance and conduct to remain in an Instructor position.

- Instructors will be evaluated on a regular basis by management to ensure quality of instruction and adherence to company training standards.
- Supervisors will observe and document Road Instructor performance at least

annually using the Instructor Performance Review (SPP D.3a).

- Supervisors will periodically review Road Instructor records and documentation to ensure consistency.
- Feedback regarding Instructor performance will be solicited from participants in the training program using the Instructor Evaluation form (SPP D.3b).
- Employee performance on final written exams and BTW evaluations will be monitored to ensure Instructor effectiveness.

D.4 Supervisors must schedule and conduct on-board evaluations for all employees who operate Company vehicles.

- On-board evaluations will include the Operator's performance of either a pre-trip or post-trip inspection.
- A Road Supervisor or other qualified individual will board the bus, observe operation of the bus while on board, and document the Operator's performance.
- On-board evaluations will occur at least one (1) time annually.
- Operators with less than one (1) year of employment with the company will have at least one (1) on-board evaluation within their first year of employment.
- On-board evaluations will be documented using the appropriate Operator Evaluation form (SPP C.4).
- Completed Operator Evaluation forms will be filed in the Operator's personnel file.

D.5 Supervisors must schedule and conduct unannounced trail check evaluations for all employees who operate Company vehicles.

- A Road Supervisor or other qualified individual will follow behind the vehicle, observe operation of the vehicle, and document the Operator's performance.
- Unannounced trail check evaluations will occur at least one (1) time annually.
- Operators with less than one (1) year of employment with the company will have at least one (1) trail check evaluation within their first year of employment.
- Trail check evaluations will be documented using the appropriate Operator Evaluation form (SPP C.5).
- Completed Operator Evaluation forms will be filed in the appropriate Operator file.

D.6 SmartDrive Properties must conduct a regular review of Operator SmartDrive incidents when they occur.

- All SmartDrive incidents should be reviewed within 3 working days.
- A SmartDrive Event Review (SPP D.6) form will be completed for each SmartDrive incident and reviewed with the Operator.
- Upon review, the operator of the vehicle will sign the SPP D.6 indicating he/she has reviewed the event.

E. PRINCIPLES OF SAFE DRIVING

It is the policy of Transdev to actively enforce safe driving and operating practices at all times. Operators will drive safely and defensively at all times and in a manner that prevents accidents, injuries and property damage from occurring.

The following principles of safe driving apply to all employees responsible for operating company vehicles.

General Safety Principles:

- E.1 Transdev employees will be trained and licensed for the type of vehicle being operated. Only Company employees and individuals authorized by the Company may drive Company vehicles.**
- E.2 Operators will abide by applicable traffic laws, signs and signals at all times.**
- E.3 The posted speed limits must be observed at all times. Vehicle speed must never exceed that which is safe for current driving conditions, regardless of posted limits.**
- E.4 Seatbelts must be properly worn at all times when operating a Company vehicle.**
- E.5 Operators will not wear portable headphones, Bluetooth devices, earphones, or other such devices while operating company owned or leased vehicles.**
- E.6 Operators are not permitted to eat or drink while operating a Company vehicle.**
- E.7 Smoking or the use of tobacco products is permitted only in designated areas. Smoking or the use of tobacco is not permitted inside Company vehicles or when otherwise representing the Company.**
- E.8 Employees must comply with Transdev's Cellular Telephone and Other Electronic Devices Policy. Specific directives are provided in the Transdev Cellular Telephone and Other Electronic Device Policy.**
- E.9 Transdev Operators are required to be in proper uniform while on duty. Operator attire must not interfere with safe driving or peripheral vision. The Uniform Policy includes, but is not limited to, the following safety requirements:**

- Shirts will be properly tucked in and buttoned.
- Uniform pants and shorts will be clean and neat.
- Operators will wear shoes with anti-slip soles. Shoes will be black with a heel no higher than one (1) inch. Open-toed shoes are not permitted.
- Socks will be worn at all times.
- High Visibility Garments will be worn as directed. (See Transdev SOP for High Visibility Garments for further direction).
- Jewelry will be kept to a minimum, and may in no way obstruct vision.
- Sunglasses may not be worn from dusk to dawn.
- No head gear other than a uniform hat is permitted. Hats will be worn with the bill facing forward.
- Hair will be worn so as not to interfere with peripheral vision.
- Facial hair will be neatly trimmed so as not to interfere with peripheral vision.

Vehicle Inspections

E.10 Operators are required to conduct and properly document a Pre-trip Inspection using a Transdev Daily Vehicle Inspection Report before operating a revenue service vehicle, to include mid-point reliefs and split shifts. Paratransit Operators are required to use a Transdev Daily Vehicle Inspection Report before operating a paratransit vehicle.

- Vehicles will be inspected in a complete and thorough manner according to established procedure and based on federal, state and local law.
- Vehicles with identified safety defects, which are any defects that could cause or contribute to an accident or injury, will be reported immediately, and will not be operated until approved by a qualified individual.
- A completed Daily Vehicle Inspection Report will be in the driver's possession while operating the vehicle.
- The previous month's Vehicle Inspection logbook shall remain on the bus until the current month's book is completed.
- Failure to comply with the Pre-Trip Inspection Policy is considered cause for corrective action, up to and including termination.

E.11 Operators are required to conduct and properly document a Post-trip Inspection after operating a company vehicle. Failure to comply and to report damage will

be considered cause for corrective action, including possible termination.

- Vehicles will be inspected in a complete and thorough manner according to established procedure and based on federal, state and local law.
- Vehicles with identified safety defects, which are any defects that could cause or contribute to an accident or injury, will be reported immediately, and will not be operated until approved by a qualified individual.
- Failure to comply with the Post-trip Inspection Policy is considered cause for corrective action, up to and including termination.

Defensive Driving and Basic Maneuvering

E.12 Operators must properly adjust the driver's seat and mirrors prior to operating the vehicle to reduce the risk of blind spots while driving.

E.13 Operators must continuously practice defensive driving which means doing everything reasonably possible to avoid collisions, including anticipating possible hazards.

- Operators must continuously scan for potential hazards around the vehicle. This is especially relevant when changing lanes, crossing intersections or turning the vehicle at an intersection.

E.14 Transdev Operators must establish and maintain an adequate following distance, as instructed in safety training, during clear, dry weather conditions to safely avoid other vehicles making a sudden stop or other unexpected maneuver.

- Following distance should be increased when being "tailgated" by another motorist.
- Following distance should be increased when driving in night conditions, inclement weather, fog, or other adverse driving conditions.

E.15 Operators must maintain adequate side space cushions around the vehicle at all times.

- Operators will adjust side space cushions when necessary to avoid unsafe intrusion by other drivers.
- Operators will leave adequate space in front of the vehicle when stopped.

E.16 Operators should avoid backing the vehicle.

- When stopping or parking the vehicle, Operators should allow adequate space ahead to pull around other vehicles or objects without having to back the vehicle.

- If the Operator is in a position where backing is necessary, the Operator will either engage the assistance of a responsible spotter, or get out of the vehicle and look before backing.
- If backing becomes necessary, Operators will communicate with dispatch, flash hazard lights, and take actions to ensure that vehicles and pedestrians near the bus are aware that it is backing.

E.17 Operators should drive in the right lane at all times, which is the common lane where transporting passengers occurs.

- If a lane change becomes necessary, Operators will check mirrors, engage the turn signal well in advance, and when clear to do so, make a gradual and smooth lane change.
- Operators will obey applicable local laws and orders governing driving in the right lane.

E.18 Operators must perform proper steering and maneuvering at all times.

- Operators are not permitted to make U-turns.

Starting, Stopping and Securing the Vehicle

E.19 Operators are responsible for properly starting the vehicle.

- Under no circumstances are Operators permitted to start the vehicle by reaching through the driver's window.
- Operators are not permitted to start the vehicle while standing next to the driver's seat. Operators will be properly seated in the driver's seat when starting the vehicle.

E.20 Operators are responsible for properly securing the vehicle prior to exiting the driver's seat.

- Operators will pull the parking brake and assure the transmission is in the proper position.
- Operators are not permitted to use the rear door interlock to secure the bus.
- Operators are not permitted to leave the driver's seat while the vehicle is in gear.

E.21 Operators are not permitted to idle the vehicle for more than ten (10) minutes.

- When the vehicle is stopped for longer than ten minutes, Operators will shut off the vehicle, utilizing proper shut off and cool-down procedures.
- Operators will obey applicable local laws and orders governing the idling of vehicles.

E.22 After completing a driving shift, Operators must properly shut down the vehicle.

- Operators will properly secure the vehicle.
- Operators will turn in the vehicle keys to dispatch or appropriate management personnel upon completion of a shift.

Passenger Safety

E.23 Operators must notify dispatch and then document/submit an Operator Incident Report (SPP E.23) for injury, accident, any unusual circumstances or situations involving passengers.

E.24 Operators will follow all requirements set forth by the Americans with Disabilities Act (ADA) when transporting passengers.

- Operators driving fixed-route schedules will call out major time points and arrivals at terminals.
- Operators will call out major intersections, transfer points, and all stops when requested to do so by a passenger.
- Operators will have an adequate supply of equipment on board the vehicle to properly secure mobility devices.
- Operators will request that passengers using mobility devices are secured in their seats when on board vehicles equipped with seatbelts for ambulatory passengers.

E.25 Operators must exercise extreme caution when loading and unloading passengers.

- Operators will make sure all passengers are seated or standing behind the standee line before moving the vehicle.
- Operators will drop passengers off only at designated stops, unless the stop is obstructed by heavy snow, ice or excessive water or other conditions requiring the passenger to be dropped off at another location.
- Operators must check mirrors for objects or pedestrians and ensure that all areas are clear before moving the vehicle.
- Operators must use appropriate turn signals and flashers when approaching or leaving a bus stop.

E.26 Operators must exercise extreme caution at railroad crossings.

- All CDL vehicles will stop no closer than 15 feet and no further than 50 feet from all railroad crossings, open the front door or driver's window, and look and listen for a train before proceeding.
- Operators of any type of vehicle should never stop the vehicle across railroad tracks.
- Operators are to report any unsafe conditions at a railroad crossing, including but not limited to, obstructions to vision and blind corners, which deprive the operator of an assured clear distance to cross the tracks.

E.27 Operators are not permitted to have family members or other visitors in the vehicle they are operating while on duty. If family members choose to utilize Transdev services, they must be treated as regular passengers in order to avoid distractions.

- Operators are not permitted to engage in conversation with passengers while the vehicle is in motion except as necessary to perform his/her duties.
- Activities contributing to Operator distraction are not permitted while the vehicle is in motion.

E.28 Operators must regularly inspect the vehicle for cleanliness, ensuring that the vehicle is free from trash or debris that could compromise passenger comfort and safety.

- Operators will properly secure all items in the vehicle to prevent hazards such as tripping or flying objects. This includes items such as trashcans, q-strains, seat belts, fire extinguishers, reflectors, first aid kits, etc.

Mobility Aid Safety

E.29 Operators must consider safety, courtesy and efficiency at all times when moving and transporting passengers using wheelchairs.

- Only Transdev employees trained in proper mobility aid procedures are permitted to move or transport passengers in wheelchairs.
- Operators will conduct a thorough pre-trip inspection to ensure that passengers in wheelchairs will be transported safely, including but not limited to:
 - (a) All components of the lift system will be checked by cycling the lift.
 - (b) All mobility aid straps and passenger restraints will be checked.
 - (c) A seatbelt cutter available in each vehicle.
 - (d) The ADA interlock system in mobility aid vans will be checked, ensuring that the transmission, parking brake and lift switch are working properly.
- Operators are not permitted to leave the vehicle running in front of residences or facilities for an excessive amount of time.

- Manual lift operation should only be used when the lift cannot be operated electrically.
- In paratransit operations, operators are not permitted to leave passengers unattended on lifts in the upward position or on inclines or ramps.
- Tie downs will be stored in their proper containers when not in use.
- When moving passengers in wheelchairs, Operators will maintain physical contact with the mobility aid at all times. Operators will lock the mobility aid brakes before removing their hands from the wheelchair.
- Operators will communicate with passengers when moving them to keep them informed and ensure comfort. Passengers will be informed in situations where it is necessary to tip the mobility aid back.
- Employees will notify Dispatch immediately when circumstances prevent them from following proper mobility aid procedures.

E.30 When assisting passengers in wheelchairs, Operators must follow specific maneuvering and lifting procedures to ensure both passenger and Operator safety.

- Operators are not permitted to lift wheelchairs except in emergency situations.
- When using physical strength to move passengers or secure tie-downs, employees will use proper techniques to prevent back injuries.
- Wheelchairs will be moved as smoothly as possible at all times. Wheelchairs will be pulled or backed downhill, pushed uphill and should not be moved over multiple steps.
- When possible to do so, Operators should be on the downhill side of the mobility aid when going up or down ramps to minimize the risk of losing control.
- The mobility aid will be locked into position so the chair is immobile when passengers attempt to stand, sit or transfer in or out of the wheelchair. Operators will also place their foot beside the large wheel and firmly hold the mobility aid handgrips.

E.31 Operators must follow guidelines to ensure that mobility aid equipment is working and used properly.

- Operators will always check the mobility aid grips to make sure they are not loose. Operators should remove loose handgrips when handling the wheelchair, return them when finished and inform the passenger of their condition.
- Operators will check the mobility aid brakes to make sure they work properly.

- Speed control dials will be turned down on electric wheelchairs when maneuvering the wheelchair.
- Operators will notify Dispatch if a passenger's mobility aid is broken or damaged in a way that compromises safety or the ability to tie down and secure the wheelchair.

E.32 Operators must ensure that proper conditions are present and follow specific procedures when using the lift platform to assist passengers in wheelchairs.

- When possible, Operators will be positioned on the same side of the street as the pickup location.
- The vehicle will be positioned on firm, level ground with the lift resting on concrete or pavement. Operators should avoid soft, wet or slippery surfaces.
- Operators will maintain control of the mobility aid throughout the entire lift procedure.
- Operators will use lift securement belts at all times when passengers are on the lift platform. This is applicable to only those vehicles that are equipped with lift securement belts.
- Operators must always stand on the lift with ambulatory passengers to assist if needed. Ambulatory passengers should never be left alone on the lift.

E.33 Operators must follow proper securement procedures when assisting mobility aid passengers on board the vehicle. An Operator that fails to follow proper securement will be subject to termination.

- All passengers will be secured in wheelchairs and mobility aids in a forward-facing position.
- Operators will position the mobility aid evenly front to rear and side-to-side in the mobility aid securement area.
- Operators will ensure that mobility aid brakes are locked and electric wheelchairs are turned "off."
- Operators will complete the entire mobility aid securement procedure from start to finish once it is initiated.
- Operators will secure the mobility aid first and the passenger second.
- A seven-point tie-down system will be used on all wheelchairs and mobility devices. Four points will secure the mobility device and three points must secure the passenger.
- Unoccupied wheelchairs will be tied down using the proper four-point tie-down procedures.

- All three wheeled and four wheeled scooters should be properly secured. Operators will notify Dispatch if a scooter cannot be properly tied down.
- Passengers using scooters should be encouraged to transfer to a seat while on board a vehicle. Passengers should be properly secured.
- When passengers are secured, Operators will stow the lift in its proper compartment and close the lift doors. The lift should not be stowed with the lift belt attached.
- Operators will re-check all straps and tie-downs by pulling them from the back of the mobility aid to make sure they do not move. The mobility aid should not move one-inch in any direction.
- Operators will tap tie-downs with their foot to make sure they are secured in their tracks.

E.34 Operators must use proper unloading procedures when assisting mobility aid passengers off the vehicle.

- Operators will position the vehicle so that the unloading zone is on level ground.
- When the passenger is safely unloaded, the lift area will be secured by properly stowing the lift and closing the doors.
- When lift area is secured, Operators will turn the engine off and remove the keys from the ignition.
- Operators will notify a Supervisor or qualified personnel if the lift malfunctions with a passenger on board. Operators will stay on the lift with the passenger while a qualified individual activates the lift manually.

Mechanical Road Failures

E.35 In the event of mechanical breakdown or road failure, Operators must take precautions to keep all passengers safe.

- Operators will safely stop the vehicle and pull over as far to the right side of the road as possible.
- Operators will notify Dispatch immediately. Dispatch will notify the appropriate maintenance personnel, and the authorities if needed.
- Operators should turn off the engine and electrical devices if a fire is suspected.
- Operators will put on emergency flashers and set out reflective triangles.
- Operators should check for the cause of the breakdown and make minor corrections if possible.

- Passengers should be evacuated to a safe spot if danger exists on board the vehicle.

F. ACCIDENT AND INJURY INVESTIGATIONS

It is the policy of Transdev to conduct prompt, accurate and thorough investigations of all accidents, injuries, illnesses and identified hazards, with the goal of promoting safety and preventing reoccurrences.

General Reporting/Investigation Practices

F.1 Transdev employees are required to report any injury or accident, regardless of severity, immediately after its occurrence.

- Employees that do not report an accident immediately will result in disciplinary action up to and including termination.
- Management will be involved with Discipline for all Category 1 (Preventable Accidents).

F.2 Specific investigation and reporting procedures must be followed to meet requirements set forth by Transdev and various agencies.

F.3 Employees involved in preventable vehicle accidents or injuries will participate in post-accident training before returning to revenue service.

- Post-accident training content will be based on the cause(s) of the accident or injury.
- Post-accident retraining for vehicle accidents will include, at a minimum, one hour of Behind the Wheel instruction.
- A satisfactory final evaluation (SPP 3.4) must be completed before an Operator returns to revenue service.
- Employees will demonstrate that they have learned how to avoid the type of accident or injury that occurred before returning to revenue service.

Work Related Injuries or Illnesses

Upon notification of a work-related injury/illness, the appropriate Supervisor or Manager will:

F.4 Arrange for appropriate first aid or medical services for any injured/ill employees when the situation requires medical assistance, or when requested to do so by the injured/ill employee.

F.5 Inspect the accident scene for hazards that present serious or immediate danger to employees or the public.

F.6 Individually interview the employee and any witnesses as soon as possible after the incident and document responses.

- Injured employees will complete an Employees Report of Work Injury (SPP F.6).
- Employees/witnesses involved with the incident will provide a report and signature verifying their description of the incident.
- Employees who are physically unable to provide a report immediately after the incident will complete a report within 24 hours of the incident or as soon as they are physically able.

F.7 Use the Supervisor's Investigation Report (SPP F.7) to obtain all relevant information regarding the incident.

Work Related Injury/Illness Reporting and Follow-Up

Following investigation of a work-related injury/illness, the Supervisor or Manager will:

F.8 Determine if the injury/illness is work-related. An incident is considered to be work-related based on the following U.S. Department of Labor guidelines:

- An event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness.
- Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment.
- An injury or illness occurring in the work environment that falls under one of the following exceptions is not considered to be work-related, and therefore is not recordable:
 - (a) The employee was present in the work environment as a member of the general public rather than as an employee.
 - (b) Signs or symptoms surfaced at work but resulted solely from a non-work-related event or exposure that occurred outside the work environment.
 - (c) The injury or illness resulted solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity.
 - (d) The injury or illness was solely the result of an employee eating, drinking, or preparing food or drink for personal consumption.
 - (e) The injury or illness was solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
 - (f) The injury or illness was solely the result of personal grooming, self-medication for a non-work-related condition, or was intentionally self-inflicted.
 - (g) The injury or illness was caused by a motor vehicle accident and occurred on a company parking lot or company access road while the employee was commuting to or from work.
 - (h) The illness is the common cold or flu. Certain contagious diseases may be considered work-related if the employee is infected at work.

- (i) The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.
- Supervisors/Managers who are not certain of a determination of work-relatedness will seek guidance from a Transdev upper management designee and refer to the U.S. Department of Labor compliance requirements.
- If there is reason to believe the injury/illness is not causally related to the employee's employment, Supervisors/Managers will submit the claim and notify the Adjuster, providing as much detail as possible. The specific reasons for questioning the injury or illness will be provided.

F.9 Supervisors or Managers must report injuries immediately, and in all cases no later than 24 hours after the incident occurs and ensure that the appropriate State Workers' Compensation Report is received.

- Supervisors/Managers will refer to the Corporate WC Claim Manager, Adjuster and the Office of Worker's Compensation specific to their state for applicable requirements and reporting procedures.
- Supervisors/Managers will comply with state claims reporting and filing procedures.
- Management will be involved with Discipline for all Category 1 (Preventable Injuries).

F.10 Determine whether the injury/illness is OSHA Recordable based on OSHA Recordkeeping Guidelines.

- Based on general recordkeeping guidelines, an injury or illness is considered to meet recording criteria if it results in any of the following:
 - (a) Fatality
 - (b) Days away from work
 - (c) Restricted work or transfer to another job
 - (d) Medical treatment beyond first aid
 - (e) Loss of consciousness
 - (f) A significant injury or illness diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.
- Within seven (7) calendar days after receiving notice of the incident, record and log the OSHA Recordable injury/illness.
- It is the responsibility of the General Manager to ensure completion of the OSHA 300 Log.

- F.11 Require employees involved in work-related injury/illness investigations to undergo a post-accident drug and alcohol test or, if applicable, a reasonable suspicion drug and alcohol test.**
- F.12 Offer Modified Duty to all employees who sustain a work-related injury/illness resulting in a restriction to their normal work duties. Supervisors must complete and send the Modified Work Letter and Schedule (SPP F.12) to the employee.**
- Modified duty positions will be offered only to eligible employees who are not able to perform their normal work duties.
 - Employee absences and restrictions will be accompanied by a detailed physician's report specifying the nature of the injury/illness, the exact performance limitations, and the length of time the injury/illness is expected to restrict work duties.
 - Transdev will make every effort to reasonably accommodate the employee's work restrictions, given that productive work is available based on the employee's restrictions.
 - If an employee's work restrictions prevent a productive work schedule, the employee shall not return to work until receiving full release or until the company is able to accommodate the restrictions.
 - A modified duty file will be maintained, documenting all correspondence and progress of the injured employee.
 - When the employee returns to full duty, a physician's note indicating a full release to return to normal job duties will be presented and filed.
 - Supervisors/Managers are required to ensure that Modified Duty programs meet state-specific guidelines as outlined by Workers' Compensation requirements.
 - Supervisors/Managers will notify the Adjuster if the employee has lost time away from work due to a lack of modified duty or per doctor's orders.

Implement all measures necessary to correct, eliminate or minimize the chance of future injuries/illnesses of the same root cause, including a written plan with specific action steps and completion dates, as outlined in the Supervisor's Investigation Report.

- Post-accident retraining for injuries will be for a minimum of one hour.
- Three violations of established work safety rules within a 24-month period will result in termination. Management reserves the right to terminate for fewer violations based on the severity of the violation.

Vehicle Accidents

F.13 Accident Investigation materials must be stored on board each Company vehicle in the event of an accident. Materials must include, but are not limited to:

- (a) Paper
- (b) Pencil
- (c) Customer comment cards
- (d) Accident Involvement Seating Diagram (SPP F.13)
- (e) Accident/Incident reports

F.14 Operators must stop the vehicle and notify Dispatch immediately after an accident occurs. Failure to comply with this section will result in termination.

- Operators will notify Dispatch if the vehicle collides or comes into contact with any type of object or pedestrian, no matter how slight or minor the accident, and whether or not damage occurs.
- Operators will provide the following information to Dispatch:
 - (a) The exact location of the accident, vehicle/route number and direction of travel
 - (b) Any injuries or passenger complaints
 - (c) Condition of the vehicle
 - (d) Damage to any other property
- Operators will remain in contact with Dispatch until all necessary information has been obtained.
- Dispatch will determine the severity of the accident and notify the appropriate emergency, fire and police authorities.
- Dispatch will notify the appropriate Supervisor or Manager and ensure that a street Supervisor responds to the scene.

F.15 Operators are not permitted to leave the scene of an accident or move the vehicle until released by proper authority. Doing so will result in disciplinary action, up to and including termination.

F.16 The Supervisor and appropriate individuals will travel to the scene and conduct a thorough investigation of the accident.

- Complete Accident Investigation Kits will be in the possession of Supervisors with primary investigation responsibility at all times. Accident investigation materials include, but are not limited to the following:
 - (a) Reflective vest
 - (b) Lined paper

- (c) Clipboard
- (d) Clear plastic sheet
- (e) Plastic bags
- (f) First-aid kit
- (g) Body Fluids Spill Kit
- (h) Map
- (i) Accident forms
- (j) Cellular phone or radio
- (k) 35mm Camera (or digital)
- (l) Film
- (m) Flashlight
- (n) Batteries
- (o) 100' measuring tape
- (p) Chalk
- (q) Marking pens
- (r) Ball point pens
- (s) #2 pencils
- (t) Customer Comment Cards

F.17 Operators must take action to keep passengers and all those involved with the scene of the accident protected from further injury or harm. If necessary, the vehicle can be moved to a safe place to avoid immediate danger.

- Operators must check the bus for potential hazards and evacuate passengers if necessary.
- Operators must check for injuries and provide medical assistance to injured passengers to the extent qualified or allowed.
- Operators will display emergency triangles to notify and warn oncoming traffic of the accident.
- Operators should keep passengers informed of the situation and steps to be taken.

F.18 Operators must strive to keep Transdev free from unjust or excessive liability claims.

- Operators are not permitted to admit fault or guilt.
- Operators should be cooperative with police during their investigation.
- Operators will obtain accurate information about other drivers and any witnesses involved.
- Operators should observe and document the events and individuals involved, noting individual behaviors, weather and traffic conditions and any other relevant factors.
- Operators are required to provide customer comment cards to passengers and witnesses, making sure they are filled out correctly and completely.

- Supervisors at the scene will review and approve any statement of facts or events prior to submitting it to the police as part of a police report.

Vehicle Accident Reporting and Follow-Up

F.19 Operators involved in a Federal Transit Administration (FTA) reportable accident must undergo post-accident drug and alcohol testing in accordance with federal guidelines. Please refer to the Transdev Substance Abuse Policy for more detail.

F.20 A complete and thorough Vehicle Accident Report (SPP F.20) must be submitted by the investigating Supervisor prior to the end of his/her shift, and no more than 24 hours after the accident occurs.

- Accident Reports should include comprehensive information about the accident and Operator involved, including but not limited to:
 - (a) Date/time of the accident
 - (b) Exact location of the accident
 - (c) Description of the accident, including any photographs or sketches of the accident scene
 - (d) Operator's name, address and contact information
 - (e) Operator's driver's license number
- Accident Reports should include comprehensive information about the other driver(s), vehicle(s), and witnesses to the accident, including but not limited to:
 - (a) Driver(s) name, address and telephone contact information
 - (b) Driver's license number(s)
 - (c) Name of insurance company, policy number, and insurance contact name and phone number
 - (d) Vehicle identification number(s) (17-digit VIN), year, make, model and interior/exterior vehicle color
 - (e) Vehicle license plate number(s)
 - (f) Conditions of all vehicles involved, along with any pre-existing conditions
 - (g) Name, address and telephone numbers of any witnesses and passengers
 - (h) Name, badge number and department name and address of the investigating police officer(s)

F.21 Appropriate management personnel will review the accident details to determine preventability as soon as reasonably possible.

- Employees are not permitted to return to service until a decision of preventability is determined.
- Management will be involved with Discipline for all Category 1 (Preventable Injuries).
- Employees involved in the accident will be notified of the findings regarding preventability in writing.

- Employee driving records will be charged with any accidents determined to be preventable.
- Accidents not cited by law enforcement authorities may still be determined preventable based on Transdev safety standards.
- Employees will be subject to termination following a preventable accident based on the following circumstances:
 - (a) Three (3) preventable accidents within the previous 24 floating months
 - (b) Accidents involving extreme bodily injury or property damage
 - (c) Driving while intoxicated or under the influence of drugs
 - (d) Possession of an open container of alcohol
 - (e) Homicide, manslaughter or assault arising out of operation of a motor vehicle
 - (f) Attempting to elude a police officer
 - (g) Failure to stop and report an accident or leaving the scene of an accident

F.22 Post-accident training will be provided to employees involved in a preventable accident.

- Post-accident training content will be based on the root cause of the accident.
- Post-accident training will include, at a minimum, one hour of Behind the Wheel instruction.
- A satisfactory final evaluation (SPP 3.4) must be completed before an Operator returns to review service.
- Employees must complete post-accident training prior to returning to driving duties.

Transdev Safety Policies and Procedures Acknowledgement

I have been provided an opportunity to read and review the Transdev Safety Policies and Procedures and discuss them with my Supervisor or Manager. Any questions that I may have had were discussed, answered and explained to me by my Supervisor or Manager.

I understand that these policies and procedures are “work rules” under existing labor agreements, and that violation of any element may result in discipline up to and including termination. The Safety Policies and Procedures contained in the Transdev document supersede any prior work policies and procedures. These provisions do not constitute an employment contract, nor do they supersede or contradict any active collective bargaining agreement. I am fully aware that these Safety Policies and Procedures may be amended or modified by Transdev with or without notice.

I understand that I am responsible for following the Safety Policies and Procedures contained in this document, and that my Supervisor or Manager is required to follow these written standards at all times. My signature below also indicates that a copy of this document has been made readily available to me and is stored in a common location for reference.

Employee Acknowledgement

Employee Name (Please Print)	Location
Employee Signature	Date

Employer Acknowledgement

I have discussed, answered and explained all questions with the above employee regarding the Transdev Policies and Procedures. I have informed this employee where he/she may find a copy of the Policies and Procedures manual for future reference.

Supervisor/Manager Name (Please Print)	Location
Supervisor/Manager Signature	Date