



Chatham Area Transit Safety Policies & Procedures

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Background: Chatham Area Transit is committed to leading the way to World Class Safety. Through the dedicated efforts of every team member throughout our entire company, we will become known as the safest most reliable passenger transportation service.

Chatham Area Transit will keep its employees, customers and surrounding public safe at all times. Given the risks involved with daily operations, Chatham Area Transit 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 any Chatham Area Transit property.

Purpose: The purpose of the Chatham Area Transit Policies and Procedures is to establish minimum standards of conduct, monitoring methods and reporting and record keeping requirements and communicate how Chatham Area Transit and its employees will comply with or exceed applicable safety regulations. In some cases, the provisions of these policies and procedures require Chatham Area Transit employees to meet higher performance standards than what are established by federal or state regulation. In doing so, Chatham Area Transit 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 Chatham Area Transit employees. Specific sections are applicable only to employees in safety-sensitive positions or with driving responsibilities, as well as independent contractors contracting with Chatham Area Transit, and are noted accordingly.

Accountability: Chatham Area Transit 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.

WCS safety practices: The Chatham Area Transit BEST SAFETY PRACTICES (BSP) were created as a simple method for conveying the importance of these policies and procedures in the briefest way possible. The BSP summarize the minimum safety objectives for all operations, with the goal of unifying Chatham Area Transit safety requirements into one easy-to-remember safety plan. Employees or Supervisors requesting clarification on BSP should refer to these Policies and Procedures for detailed information.

World Class Safety Practices

Chatham Area Transit is committed to Leading The Way To World Class Safety.

Through the dedicated efforts of every team member throughout our entire company, we will be known as one of the safest and most reliable passenger transportation services in the world. Six specific practices provide the foundation for achieving World Class Safety at Chatham Area Transit:

A. GENERAL SAFETY

Chatham Area Transit 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.

B. SELECTION AND HIRING

Chatham Area Transit 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 Chatham Area Transit.

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.

C. EDUCATION AND TRAINING

Chatham Area Transit 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 or risks.

D. PERFORMANCE EVALUATION

Chatham Area Transit 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 Drive Cam incidents.

E. PRINCIPLES OF SAFE DRIVING

Chatham Area Transit 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.

F. ACCIDENT AND INJURY INVESTIGATIONS

Chatham Area Transit 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, 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.

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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WCSFORMS

B. SELECTION AND HIRING FORMS

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- Annual Review of Driving Record/Certification of Traffic Violations
- Prescription Medication Notification
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- Reasonable Suspicion Supervisor's Evaluation

C. TRAINING AND EDUCATION FORMS

- Score Sheets
- Pre-Service BTW Form
- Operator Evaluation
- Trail Check Form

D. PERFORMANCE EVALUATION FORMS

- Facility Inspection Worksheet
- Instructor Performance Review
- Instructor Evaluation
- Drive Cam Event Review

E. PRINCIPLES OF SAFE DRIVING FORMS

- Daily Vehicle Inspection Report
- Daily Vehicle Inspection Report (Paratransit)

F. ACCIDENT AND INJURY INVESTIGATION FORMS

- Post-Accident Retraining Form
- Post-Accident Drug and Alcohol Testing Decision Maker Form
- Employee's Report of Work Injury
- Employee Injury Investigation
- Supervisor's Investigation Report
- Operator Incident Report
- Modified Work Letter and Schedule
- Accident Involvement Seating Diagram
- Comment Card
- Vehicle Accident Report

A. General Safety

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

It is the policy of Chatham Area Transit to adhere to the following safety requirements:

A.1 Chatham Area Transit will comply with all applicable federal, state, and local health and safety regulations and set higher performance expectations for Chatham Area Transit 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 (FT A)
 - (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 Chatham Area Transit Policies and Procedures and federal, state or local requirements, the stricter standard shall apply.

A.2 Chatham Area Transit 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.

- Chatham Area Transit 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) Bloodborne Pathogens
 - (e) Lockout/Tagout
 - (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 Chatham Area Transit 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.
- Chatham Area Transit 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 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.S Chatham Area Transit 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 that safety operations, 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 Chatham Area Transit 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 Chatham Area Transit 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 Chatham Area Transit 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 Chatham Area Transit 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.
- Make safety recommendations to management regarding preventative and corrective actions.

A.7 Chatham Area Transit designates the Regional Safety Directors as having overall 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.S Chatham Area Transit will enforce and reinforce the elements of these written Policies and Procedures consistently, thereby supporting Chatham Area Transit's commitment to safety.

- Each Supervisor/Manager will be provided a copy of the Chatham Area Transit WCS 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 "Chatham Area Transit 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 Hiring Policy

It is the Policy of Chatham Area Transit to incorporate safety into each stage of the employee selection and hiring process. Commitment to safety is a condition of employment at Chatham Area Transit.

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.

Chatham Area Transit 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 Chatham Area Transit. 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 Chatham Area Transit 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.
- 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:

- Chatham Area Transit 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.S 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 Chatham Area Transit 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.

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 on the Applicant Log 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 Chatham Area Transit 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 Chatham Area Transit 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 who 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 Chatham Area Transit 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, and Non-CDL Operators.
- The physical will be performed by a company appointed physician/facility.

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 and 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 Chatham Area Transit. The Chatham Area Transit 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 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 floating 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, Chatham Area Transit 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 Chatham Area Transit's Substance Abuse Policy. Specific directives are provided in the Chatham Area Transit 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, 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, Chatham Area Transit 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.2S 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 (medical or FMLA) for safety sensitive and driving positions must complete the required training hours as outlined by the CAT rehire criteria.

CAT Training Matrix

Separation Period -+	< 30 Days	31-90 Days	91-180 Days	180-270 Days	270-360 Days
Diagnostic Evaluation	YES	YES	YES	YES	YES
Classroom Training (ODP subjects)	YES Basic	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	YES	YES	YES	YES	YES
Classroom Hours	8	8	8	16	40
Recommended Minimum Total Hours	8+	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

The CAT Professional	Substance Abuse
Bloodborne Pathogens	Basics of Safety
Vehicle Dynamics	CAT Defensive Driving
Intersections	Reference Points
Backing Basics	

Advanced Level

Full ODP-classroom subjects

C. Training and Education Policy

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

C.I 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 Chatham Area Transit 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 Chatham Area Transit 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 Chatham Area Transit 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 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.S 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 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.

Chatham Area Transit Instructor Qualifications:

C.S 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 Chatham Area Transit's commitment to safety
 - (b) Adherence to Chatham Area Transit 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 Chatham Area Transit 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 Chatham Area Transit 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.
- 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.
- 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.

- 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.
- Completed Operator Evaluation forms will be filed in the Operator's personnel file.

D.S 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.
- Completed Operator Evaluation forms will be filed in the appropriate Operator file.

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

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

E. PRINCIPLES OF SAFE DRIVING

It is the policy of Chatham Area Transit 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 Chatham Area Transit 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 Seat belts must be properly worn at all times when operating a Company vehicle.**
- E.S 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 When seated at the wheel of a Company vehicle, the use of cellular telephones and/or other electronic devices is limited as follows:**
 - (a) In all situations, use of a Company-provided or personal cellular telephone or other electronic device while seated at the wheel of any motor vehicle is prohibited where and when prohibited by law.
 - (b) The use of any personal cellular telephone and any other personal electronic device while seated at the wheel of a Company vehicle is prohibited. These devices must be powered off at all times when an employee is seated at the wheel, regardless of whether the vehicle is powered on or off.
 - (c) Paratransit and other On-Demand Transportation Service Operators: Company-provided cellular telephones and Company-provided other electronic devices may not be used for any purpose other than for work-related purposes while seated at the wheel of any vehicle, regardless of whether the vehicle is powered on or off, and then only to the minimum extent necessary. As much as practical, said devices may only be used when the vehicle is not in motion. Whenever the use of a cellular telephone or other electronic device presents a risk to safe driving, use of the device is not permitted. No personal use of such devices while seated at the wheel of a transit or Company-provided vehicle is permitted.

(d) Managers and Road Supervisors: Company-provided cellular telephones and other Company provided electronic devices may not be used for any purpose other than for work related purposes, and then only to the minimum extent necessary. No personal use of such devices while seated at the wheel of a Company vehicle is permitted. When the use of a cellular telephone or other electronic device presents a risk to safe driving, use of the device is not permitted. As much as practical, said devices should be used only when the vehicle is not in motion. Managers or road supervisors are prohibited from the use of a cellular telephone and other electronic device when operating a revenue service vehicle at any time, in or out of revenue service.

Nothing herein shall limit the ability of the Company to impose greater restrictions on cellular telephone or other communication device possession or use during working hours.

Failure to comply with any portion of this policy is cause for discipline up to and including termination of employment.

E.9 Chatham Area Transit 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.
- 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.I0 Operators are required to conduct and properly document a Pre-trip Inspection using a CAT 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 CAT 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 log book 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 or crossing intersections.

E.14 Chatham Area Transit 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 for 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.2S 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.

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 Chatham Area Transit 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 trash cans, 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 CAT 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 Chatham Area Transit 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 Chatham Area Transit 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 I (Preventable Accidents).

F.2 Specific investigation and reporting procedures must be followed to meet requirements set forth by Chatham Area Transit 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 must be completed before an Operator returns to review 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:

FA 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.
- 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 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 Chatham Area Transit 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 within 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.IO 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 drug and alcohol test if Reasonable Suspicion exists.

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 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.

- Chatham Area Transit 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

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 Chatham Area Transit 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 Chatham Area Transit Substance Abuse Policy for more detail.

F.20 A complete and thorough Vehicle Accident Report 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 Chatham Area Transit 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 must be completed before an Operator returns to revenue service.
- Employees must complete post-accident training prior to returning to driving duties.

Chatham Area Transit Policies and Procedures Acknowledgement

I have been provided an opportunity to read and review the Chatham Area Transit 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 Policies and Procedures contained in the Chatham Area Transit manual 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 Policies and Procedures may be amended or modified by Chatham Area Transit with or without notice.

I understand that I am responsible for following the Policies and Procedures contained in this manual, 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 manual has been made readily available to me and is stored in a common location for reference.

Employee Acknowledgement

Employee Name (Please Print)

Employee Signature

Date