

Public Transportation Agency Safety Plan

Coos County Area Transportation District (CCATD)



Revised March 9, 2020

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Section 1. Transit Agency Information

General Information

CCATD

Accountable Executive: David Hope, General
Manager

Administrative Offices

Chief Safety Officer: Rebecca Jennings, Operations
Supervisor

2810 Ocean Blvd

Coos Bay, OR 97420

541-267-7111

Modes of Service: Fixed Route Bus, Demand Response

FTA Funding Sources: FTA Section 5311, 5310, 5339

Modes of Service Directly Provided: Motor Bus, Demand Response

Section 2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Coos County Area Transportation District		
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature	
	David Hope	1/24/2020	
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval	
	Relevant Documentation (title and location)		
	Coos County Area Transportation District - Public Transportation Agency Safety Plan (PTASP)		
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification	
	Relevant Documentation (title and location)		
Version Number and Update Log			
<i>Record the complete history of successive versions of this plan.</i>			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1 - Draft	All	Draft Document	1/27/2020
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 General Manager will review the PTASP annually, update the document as necessary, and implement the changes within a timeframe that will allow the agency to timely submit a annual self-certification of compliance to the Oregon Department of Transportation (ODOT). The annual review of the PTASP will be conducted as part of an internal audit beginning January 1st each year and ending prior to June 30th the end of the State Fiscal year. Necessary updates outside			

the annual update window will be handled as PTASP addendums which will be incorporated in the body of the PTASP during subsequent annual update.

All proposed changes will be documented by the management as proposed PTASP addendums and distributed to all affected parties including employees and any contract service operators. All parties must comment within two weeks of the issuance of the proposed changes unless otherwise specified. Following the approval of any modifications to the PTASP by the General Manager, management staff will distribute the PTASP addendum to all affected parties, with a cover memo highlighting the changes. All parties receiving the updates are required to sign for its receipt and acknowledge their responsibility in implementing the changes. Management will document and retain the proof of PTASP receipt by all employees during initial hire and subsequent updates. A copy of the adopted PTASP will be distributed to all employees and contract service providers. A copy of the adopted SSPP will also be forwarded to the ODOT District Office. Document reviews of the PTASP by the local agency, any subsequent updates, and addendums, adoption, and distribution activities will be documented in the PTASP Version Number and Update Log above.

Section 3. Safety Performance Targets (Baseline Process)

Safety Performance Targets							
<i>Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan per 100,000 miles.</i>							
Mode of Transit Service	Preventable Accidents	Injuries	Fatalities	Road Calls	Other	Other	Other
Fixed Route Bus							
Demand Response							

National Public Transportation Safety Plan January 2017 Version 1.0

“For every performance measure selected, FTA and transit agencies can develop baselines and targets against which to measure and compare performance. Meaningful performance targets are timely, accurate, accessible, and complete. When possible, it is best to analyze data over time to determine if trends are present.

Establishing baselines for performance measures provides grounded metrics as the basis for further and future comparison. Safety performance baselines may be established for individual transit agencies, for transit agency modes, and/or for the public transportation industry as a whole.

After a baseline is established, a transit agency can develop safety performance indicators and select safety performance targets to allow tracking of safety performance improvement progress. Performance should be measured at least annually by comparing actual performance metrics with targets and original baselines. If safety performance improves, an agency may choose to revise its safety performance targets to be more stringent or select different safety performance indicators and targets for improvement. The baseline data listed below will be collected once a new software program is implemented later this year. The metrics will include at a minimum the following:

Preventable accident rate per 100,000 miles:

Injuries per 100,000 miles:

Fatalities per 100,000 miles:

System Reliability Mean distance between Mechanical failure (Road calls)

Section 4. Safety Management Policy

Safety Management Policy Statement

CCATD strives to provide safe, reliable, comfortable, and innovative transportation options within our service area. This Public Transportation Agency Safety Plan (PTASP) has been developed to integrate safety into all CCATD system operations. By using the procedures contained in the PTASP, CCATD can continue to improve the safety and security of CCATD's operation and services.

This PTASP describes the policies, procedures, and requirements to be followed by management, and operations personnel to provide a safe environment for CCATD employees, customers, and the general public. The goal of this program is to eliminate the human and fiscal cost of avoidable personal injury and vehicle accidents.

Each department has a responsibility under the PTASP. Directors and managers shall provide the continuing support necessary to achieve the PTASP objectives. A key to the success of this effort is for employees to be aware that they are accountable for safely performing the requirements of their position. The success of the program also depends on all employees actively identifying potential hazards and making a commitment to the safety of others.

CCATD is aware that decisions and actions often affect the safety of those in other operations. By following the processes described in the PTASP, CCATD will continue to improve performance and the safety of the system while creating a culture of safety.

CCATD's commitment is to:

- **Support** the management of safety through the provision of appropriate resources that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- **Integrate** the management of safety among the primary responsibilities of all managers and employees;
- **Clearly define** for all staff, managers, and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of CCATD's safety management system;
- **Establish and operate** hazard identification and analysis, and safety risk evaluation activities--including an employee safety reporting program as a fundamental source for safety concerns and hazard identification--to eliminate or mitigate the safety risks of the consequences of hazards resulting from CCATD operations or activities to a point which is consistent with an acceptable level of safety performance;
- **Ensure** that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any

reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;

- **Comply** with regulatory requirements and standards;
- **Ensure** that sufficient skilled and trained human resources are available to implement safety management processes;
- **Ensure** that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills;
- **Establish and measure** safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- **Continually improve** safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and
- **Ensure** externally supplied systems and services to support operations are delivered, meeting established safety performance standards.

CCATD's Goals for Safety are established as follows:

- Design, construct, test, and operate a transportation system that achieves an optimum level of safety.
- Identify and evaluate, then eliminate or control hazards to employees, customers, and the public.
- Meet or exceed all government and industry occupational health and safety standards and practices.
- Maximize the safety of future operations by affecting the design and procurement processes.

The objectives of the PTASP are the means to achieving its goals. They also provide a method of evaluating the effectiveness of CCATD's safety efforts. The PTASP objectives are:

- Integrate safety management and hazard control practices.
- Assign responsibilities for developing, updating, complying with, and enforcing safety policies, procedures, and requirements.
- Verify compliance with CCATD safety policies, procedures, and requirements through performance evaluations, accident/incident trends, and internal audits.
- Investigate all accidents/incidents, including identifying and documenting the causes for the purpose of implementing corrective action to prevent a recurrence.
- Identify, analyze and resolve safety hazards in a timely manner.

- Ensure that system modifications do not create new hazards.
- Train employees and supervisors on the safety components of their job functions.

CCATD takes these commitments seriously as the lives of CCATD riders, employees, and the general public depend on CCATD's ability to operate in a culture of safety.

David Hope, General Manager

Accountable Executive

1/27/2020

Date

Safety Management Policy Communication

CCATD realizes the importance of ensuring its employees and riders are aware of CCATD safety management policies and procedures to effectively manage the system's day to day operations. To do this, CCATD relies on several forms of effective communication.

Employees: CCATD is constantly evaluating existing policies and procedures to verify their effectiveness. To do this, CCATD seeks input from all staff to determine if change is necessary based on trends, data analysis, operational changes or new assets. Several methods are used to communicate policy and/or procedure changes, including:

- ◆ Employee memorandum
- ◆ Agency meetings
- ◆ Bulletin board notices

CCATD includes a training element for all safety management policies impacting safety or service delivery which is conducted before the policy effective date. New policies and procedures are incorporated into orientation training for new employees as well.

Depending on the importance of the policy or procedure change, an acknowledgement signature is required of each employee verifying their understanding of the change.

Riders: If a rider policy is changed or added, CCATD notifies riders through the following methods:

- ◆ Notice posted on vehicle and public service announcements with an effective date and who to contact for more information;
- ◆ Changes to digital rider guidance including schedules and ride guides as appropriate;
- ◆ Public Meetings;
- ◆ Social Media; and
- ◆ Any services impacted by policies changes will include outreach as required by Federal Title VI Guidance.

Authorities, Accountabilities, and Responsibilities

As mentioned in the Safety Policy Statement, the ultimate authority for the success of this PTASP falls to the Accountable Executive (AE). The Chief Safety Officer (CSO), the administration and management team, as well as employees fulfilling their commitment to safety on a day-to-day basis support the AE.

Accountable Executive (AE)

The Accountable Executive will determine, based on feedback from senior staff, the level of Safety Management System principals to maintain to ensure a safe work environment, rider experience and community safety. CCATD's AE is committed to providing employees with the tools and training needed to be successful and safe in their roles with CCATD. The AE will continually strive to create a culture of safety among the employees, and CCATD expects each employee to play a role in maintaining a safe workplace.

CCATD's AE will be responsible for developing an annual budget to provide the necessary funding to support training for new hires and experienced staff while also maintaining assets in a State of Good Repair (SGR) and/or replacing it, if it is no longer able to function as originally intended.

The current Accountable Executive, David Hope, is also the Transit General Manager and is responsible for implementation and changes to this Plan.

Chief Safety Officer (CSO)

CCATD has concluded one CSO will be sufficient to manage the day to day adherence to this Plan and, while in this role, report directly to the AE. The CSO is also the Operations Manager, Rebecca Jennings, and is responsible to monitor safety and security throughout the organization. All staff will be notified of the CSO's role and the established reporting requirements relating to safety-related matters.

CCATD's CSO will be responsible for the following:

- ◆ Developing and maintaining Safety Management System (SMS) documentation;
- ◆ Directing hazard identification and safety risk assessment;
- ◆ Monitoring safety risk mitigation activities;
- ◆ Providing periodic reports on safety performance;
- ◆ Briefing the Accountable Executive SMS implementation progress; and
- ◆ Planning safety management training.

CCATD Safety Management System (SMS)

A Safety Management System (SMS) is a comprehensive, collaborative approach to managing safety. It brings management and labor together to control risk better, detect and correct safety problems earlier, share and analyze safety data more effectively, and measure safety performance more precisely. SMS helps transit agencies apply resources to risk and ensure they have the organizational infrastructure to support decision-making at all levels regarding the assignment of resources.

Some key parts of SMS include:

Defined safety roles and responsibilities;

Strong executive safety leadership;

Formal safety accountabilities and communication;

Effective policies and procedures; and

Active employee involvement.

Operators of public transportation systems that are subject to the PTASP rule must develop and implement SMS processes as part of their agency safety plans.

Roll of Staff to Develop and Manage Safety Management Systems (SMS)

Accountable Executive

The Accountable Executive (AE), who also serves as General Manager, will work with the Chief Safety Officer (CSO) to adjust the PTASP as needed based on staff feedback, trends, and data analysis. The AE is vested with the primary responsibility for the activities of the transportation district and overall safety performance. The AE fulfills these responsibilities by providing the resources necessary to achieve PTASP goals and objectives by exercising the approval authority for system modifications as warranted. The AE also sets the agenda and facilitates the cooperative decision making of the CCATD Board of Directors.

Chief Safety Officer (CSO)

For purposes of managing the SMS and PTASP, the CSO will report directly to the AE to determine strategy, policy, and goals for maintaining safety and security for passengers, employees, and the general public. The CSO will monitor day to day operations and work with staff to identify and mitigate risk through evaluation, feedback, and data analysis.

Operations Manager

The Operations Manager (CSO) is responsible for the safety performance of all personnel and equipment under her supervision. She is responsible for the initial investigation of all accidents and incidents, and for reporting these accidents and incidents to the Human Resources and Special District Association of Oregon (SDAO) Insurance Department.

Employees

All CCATD personnel are responsible for performing their work safely and for following established safety-related rules, procedures, and work practices. This includes reporting all accidents, incidents, and hazards to their supervisor per established requirements for the protection of themselves, co-workers, customers, facilities, and equipment.

Key Staff

CCATD staff will be responsible for maintaining high standards of safety, customer service, and security. The Employee Safety Reporting Program (ESRP) will define the employees' role to identify and mitigate risk through open communication to superiors including the CSO and AE. Administrative staff will be instrumental in ensuring action is taken to reduce risk and the whole system is continuously monitored to ensure actions are effective and appropriate.

CCATD staff will be involved with updates, modifications and implementation of the PTASP. Each staff member brings a valued perspective to the development of policies and procedures he or she will be expected to implement. Every opportunity will be given for employees and riders to provide input to increasing safety at CCATD. Those opportunities include monthly safety meetings, annual employee meetings and training, department meetings, customer and employee surveys and an open-door policy with access to all management staff.

Employee Safety Reporting Program (ESRP)

As stated in the [Safety Management Policy Statement](#), CCATD is determined to provide a safe working environment for its employees, riders and the general public. To ensure success, CCATD has developed an ESRP to enable employees to report any risk or perceived risk to a supervisor, CSO, or member of administration.

The ESRP allows each employee to report detailed information and observations whether they are a driver in service, maintenance staff, or other on-duty employee. This program dovetails with other methods currently in place to proactively identify hazards or threats. Those methods include but are not limited to the following:

- ◆ Pre/Post Trip Inspections
- ◆ Preventive Maintenance Inspections
- ◆ Employee Evaluations
- ◆ Facility Maintenance Plan
- ◆ Training Program Safety Training & Rural Transit (START)
- ◆ Rider and Public Complaint/Compliment Process (Riders Guide Available February, 2020)
- ◆ Safety and Employee Meetings
- ◆ Incident/Accident Policies
- ◆ Safety Committee

CCATD has developed a Hazard Reporting Form used to identify and provide information about hazards observed by CCATD employees while on-duty. The three-page form identifies vital information to assist employees in determining an action to mitigate the threat or hazard. This form is not meant to replace accident or incident forms currently being used. It is a proactive reporting method to identify a perceived threat or hazard, potentially endangering employees, riders, or the general public. The form is located in Appendix 1 of this Plan.

Effective July 20, 2020, all CCATD employees will receive one hour of training on the procedures associated with the Hazard Reporting Form. The training will cover the following areas:

- ◆ Locations of blank Hazard Reporting Forms
- ◆ When to use a Hazard Reporting Form
- ◆ Capturing critical information on the form
- ◆ Notification process depending on the hazard
- ◆ Proper assessment of the reported hazard
- ◆ Follow-up process to determine effectiveness of mitigation

The following process is used as part of the ESRP.

Immediate Action Required

If you have identified a hazard which you perceive to be a risk to yourself, fellow employees, passengers or the public you must report it immediately to the on-duty manager or dispatcher. Once reported you must determine if immediate action is necessary to prevent additional risk. If so, communicate to supervisor before taking action if time allows. Once action has been taken to mitigate the potential

harm to yourself, others, or property advise a supervisor of the results of your actions. Once you are able, complete the Hazard Reporting Form with complete information and give to supervisor on-duty.

Delayed Action Required

Once a hazard has been identified, the CCATD employee should assess if the hazard requires immediate action to reduce the risk or if delayed action can be taken. If the employee determines delayed action is appropriate a full report must be completed using the Hazard Reporting Form and submitted to the on-duty supervisor.

Role of CSO

The CSO is responsible for advising the employee on immediate action or delayed action to mitigate a hazard. The CSO must then review the Hazard Reporting Form to ensure all information is included adding additional information from their perspective. Once the form is complete the CSO will determine what action is necessary, investigate the root cause of the hazard and follow-up.

The CSO is responsible for determining the status of each hazard reported. In some cases, hazards may be identified and are not able to be resolved but actions are taken to reduce the risk of the hazard. It is CCATD's goal to eliminate all identified hazards if possible. Some hazards may require continuous monitoring to ensure the hazard does not elevate to an action level.

All hazard reports will be documented and integrated into current performance measures and data collection. The CSO will track each hazard to completion and recommend policy or procedural changes if needed as a result of the hazard mitigation.

CCATD Responsibility

The CCATD takes every hazard report seriously and investigates each one to determine if it's an isolated case or emerging trend requiring evaluation of policies and procedures or service modifications. Employees reporting hazards will not face disciplinary action unless that employee contributed to the hazard. The CCATD wants to encourage all employees to report any hazard or threat they observe and help make the CCATD system as safe as possible for its employees, riders, and the general public. Employees may report the hazard to their immediate supervisor or go directly to the CSO to submit and discuss their report.

Section 5. Safety Risk Management

CCATD provides training to all personnel in the identification of hazards and security threats while also providing tools to enable personnel to report these risks. Once the risk has been identified, CCATD conducts an assessment of the risk to determine the necessary response and response time. The response may include further investigation or monitoring, action(s) to mitigate the hazard or security threat, and follow-up assessment to ensure action taken is appropriate and effective.

Safety Hazard Identification:

Hazard and security threats are identified through different methods of monitoring the system. This includes system, employee, and asset assessments conducted daily and on incremental basis. CCATD conducts the following routine and random evaluations of the system in the following departments:

Personnel

Each CCATD employee is evaluated annually to ensure they are performing their job to the expectations of the agency. As part of their orientation process the employee is provided training and tools to perform their job while not receiving permanent status until completing 3 months of employment. During the 3- month period, the employee is evaluated to determine if they are properly prepared to perform their job.

Additional evaluations of the employee are conducted throughout the year through spot-checks of some aspect of their job function. If through spot-check or annual evaluation it is determined the employee's performance does not meet expectations or training standards, remedial training will be provided and additional evaluations will take place to ensure remedial training was effective.

Assets

Rolling stock, facilities, and equipment are monitored through a vigorous preventive maintenance plan aimed at identifying hazards and deficiencies as part of daily and scheduled inspections. Operations and Maintenance staff coordinate the preventive maintenance program including daily Vehicle Inspection Reports (VIR)s, incremental and annual inspections.

ODOT updates the FTA required Transit Asset Management (TAM) Plan annually with data relevant to each asset to include a condition assessment, miles (with rolling stock and non-revenue vehicles) and age as to whether the asset is in a State of Good Repair (SGR). The TAM Plan allows CCATD management to plan asset replacement or rehabilitation for future years.

System

As part of CCATD's safety management system monitoring, the Agency uses service evaluations when planning, spot-checking or responding to an event like an accident or incident. New routes are strategically developed with safety being the first priority and passenger access second. The CCATD AE and CSO will plan and test all routes before activating the route for revenue service. All routes will be reviewed periodically to determine if environmental hazards may exist requiring modification to the route, schedule, or vehicle.

All front-line staff will be trained to note any changes to service which may be considered a hazard or security threat and through the ESRP, notify their supervisors immediately or upon return to CCATD depending on the severity of the hazard.

Hazard Identification Procedure

Any employee seeing something through inspection or observation they deem to be a hazard are instructed to immediately report that hazard to the immediate supervisor regardless of the perceived level of threat. Depending on the situation, either the immediate supervisor or the employee will complete a Hazard Reporting Form and submit it to the Chief Safety Officer.

If the hazard requires immediate mitigation, the employee will be instructed on steps to take to reduce the risk which may or may not alleviate the risk completely. Additional actions may be taken once the immediate risk mitigation has been taken. Some hazards may not pose an immediate risk but are still reported and the CSO will be responsible for risk assessment, investigation and mitigation strategy.

In some cases, a passenger or member of the general public may call CCATD with a complaint about a frontline employee which may rise to the level of hazardous behavior or actions. The CCATD currently documents all customer complaints/compliments and takes appropriate action to investigate any complaints. Complaints deemed hazardous will trigger immediate action.

Hazard Identification Forms will be located on all vehicles along with standard safety kits for accident and incident reporting. A copy of the form is located in Appendix 1.

The Hazard Identification Form will require the employee to briefly describe the hazard noting date, time of day, location and other pertinent information. The form includes a section for the CSO or immediate supervisor to document immediate action taken to reduce risk, a risk assessment chart prioritizing the risk, and a section for additional follow-up action. All forms will be processed by the CSO and summarized periodically for trend analysis and include in safety performance measures.

49 CFR part 673.5

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

Safety Risk Assessment

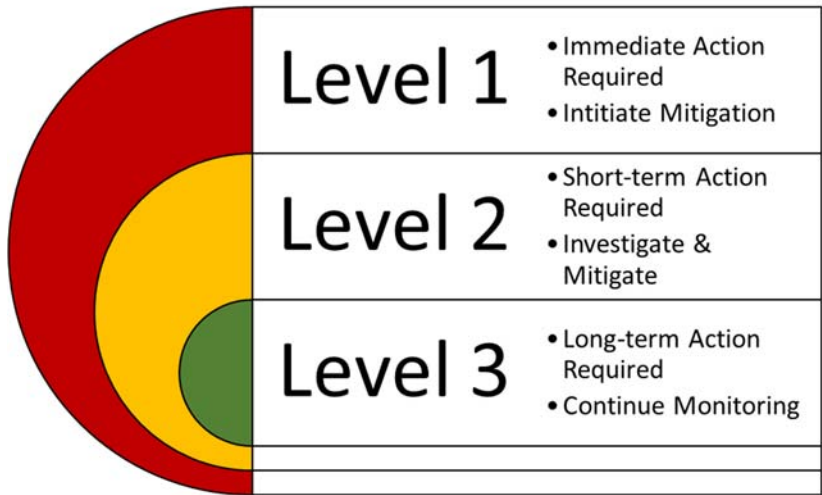
All CCATD staff will be provided with training appropriate for their positions within the organization. CCATD expects its employees to respond to hazards or threats with professional judgement as sometimes there might not be time to contact a supervisor to prevent an emergency event. In cases where the hazard can be reported without immediate risk, the employee will make an initial assessment of the risk as part of their report.

Once received by the Chief Safety Officer, the initial risk assessment may be amended requiring immediate, short, or long-term response.

Level 1 - Immediate: A deficiency, threat or hazard requiring immediate attention to mitigate risk either temporarily until further action can be taken or complete mitigation.

Level 2 - Short Term: Action is needed within seven days to mitigate an identified deficiency, threat or hazard. The deficiency, threat or hazard does not pose immediate danger but if no action is taken could elevate to an Immediate level risk.

Level 3 - Long Term: A deficiency, threat or hazard has been identified but does not pose a threat currently but could at a later time. Continued monitoring and awareness are required.



The CSO in coordination with staff will investigate each identified hazard, assess the risk and take appropriate action to mitigate the risk. Additional mitigation may be needed based on follow-up monitoring to the action taken.

Safety Risk Mitigation

In response to all identified and assessed hazards, CCATD staff will take steps to mitigate the hazard and reduce or eliminate the risk to employees, riders and public. Mitigation strategies will be dependent on results of investigation into the elements contributing to the risks. The investigation may include more than one department and may include interviews outside of the transit system.

Actions to mitigate risk will include all employees, riders, and the public who may be impacted by either the hazard or the actions to reduce or alleviate the risk. CCATD staff will communicate actions as may be appropriate. In some cases, immediate communication through two-way communications (dispatch system, email or web alert) may be necessary. In other cases, bulletin board notices or memorandum posting may be appropriate.

Once a risk mitigation strategy has been implemented CCATD will monitor the actions to determine if full mitigation is possible and if not, is additional action necessary to alleviate the risk or is stepped up monitoring necessary. Some risks may not be completely mitigated but awareness to the risk is a top priority.

All actions taken to mitigate risk will be documented and linked to the initial deficiency, threat or hazard identification step.

Section 6. Safety Performance Monitoring and Measurement

Safety performance monitoring and measurement involves the continual monitoring of the CCATS's activities to understand safety performance. Through these efforts, CCATD can determine whether it is meeting its safety objectives and safety performance targets, as well as the extent to which it is effectively implementing Safety Management Systems (SMS).

CCATD is constantly striving to maintain the highest level of safety through its monitoring methods to include adherence to policies and procedures, safety and maintenance plans, and system and employee evaluation processes. These methods allow CCATD to determine the need to make changes to improve policies, employee training and service delivery.

Maintenance

Maintenance Standards and Procedures. Standards and procedures are included in Maintenance Plan. In general, maintenance procedures are designed to ensure that the maintenance recommendations of the manufacturer are met, maximum efficiency in performance and operation is obtained, and maximum bus life and condition are maintained. Daily bus inspections, an active Preventive Maintenance Program, and careful monitoring are included in procedures to ensure the safety of buses and adequacy of the Maintenance Plan.

Operator Inspections

All operators are required to perform a pre-trip and post-trip inspection to ensure that the vehicle is safe and in good operating condition. If any defects are noted by the operator, a Defect Slip will be completed and, depending on the severity and extent of the defect, the vehicle may be repaired or taken out of service until a repair can be made. In the case of a defect that develops or is noted once a vehicle is in service, the operator is required to communicate the problem to the Operations Manager or Dispatcher, who will then notify Maintenance.

Mileage-Based Maintenance Inspections

All buses receive preventive maintenance inspections (PMI) at designated mileage intervals. Mileages are determined by vehicle and subcomponent manufacturers and real-world experience. A description of the schedule and type of inspection and service performed for each bus series is included in the Fleet Maintenance Plan.

Operations

Facility Monitoring

Formal facility inspections of all CCATD facilities and grounds will be conducted by members of the Safety Committee quarterly using a facility checklist. The purpose of the inspections is to identify any unsafe or unhealthy conditions which may exist, and that may require maintenance or modification. The facility will also be visually inspected for compliance with OSHA and local fire codes.

Reporting

When deficiencies are noted during quarterly inspections, they are documented and reported to the General manager or Operations Manager. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor. Hazard Reporting Forms are routed

to the department, CSO, or the director best equipped to evaluate the concern and, when necessary, propose a resolution.

Hazard Resolution

The primary purpose of facility inspections and hazard reporting is to identify conditions that could lead to accidents and losses. In view of this, it is crucial that all departments and employees be involved in the Facility Inspection and the Hazard Identification and Resolution processes. Hazard resolution is related to the severity of the hazard and the probability and severity of a negative consequence of the hazard.

Follow-up

Corrective action for a confirmed hazard that has been identified by any established process is the responsibility of the AE and or CSO. This includes arranging for the services of outside parties, as necessary, to eliminate or control the hazard.

Documentation

Hazards that have been identified, the proposed resolutions, and corrective actions are recorded and maintained by CSO.

All front-line personnel are responsible for monitoring safety and security as part of their respective positions. If a hazard is identified through observation or interaction with customers or the general public, it is reported to the immediate supervisor as well as following CCATD's hazard reporting process.
Employee Hazard Reporting

Reporting Forms

Employees can fill out a Hazard Reporting Form which is turned into the CSO or talk with the Operations Manager. They can also contact a Safety Committee member. Depending on the severity/risk of the hazard identified, immediate action may be taken, or the input will be brought to the Safety Committee for discussion. Feedback will be provided to the employee on what action, if any, will be taken. All employees follow the Employee Safety Reporting Program Policy.

Route/Operations Safety

Employees can fill out a Hazard Reporting Form or discuss suggestions for making the system/route safer. CCATD encourages employees to be advocates for safety while also suggesting methods of increasing performance. Management has an open-door policy and makes clear the importance of employee feedback; positive and negative.

Safety Events

Accident and Incident Reporting Process

All accidents and loss incidents are to be investigated. CCATD's safe driving standards require professional safe performance of all operators. To ensure better than average safety performance, CCATD employs the Defensive Driving guidelines to determine if a collision or onboard incident could have been prevented. All personnel operating any CCATD vehicle are held to this standard.

Transit Operations coordinates with outside law enforcement agencies if they investigate an event. Administrative staff coordinates with outside insurance providers and provides support among CCATD staff and independent investigation to manage CCATD liability and claims.

Most accidents and incidents involving CCATD are relatively minor in severity and are investigated by Operations Manager. Since most accidents involve buses, this section focuses on bus accidents. However, all non-bus accidents and incidents are also investigated.

Notification

Bus Operators are to notify the Operations Supervisor anytime an CCATD vehicle might have been damaged, anytime an CCATD vehicle and another vehicle come into contact, or anytime an instance occurs in where a customer may have been injured. The Operations Supervisor will be directed to the scene. Police and ambulance will be dispatched, if necessary.

At-Scene Procedures

Bus Operators will adhere to the following procedures defined in the CCATD HR Manual:

Accident Procedures

Drivers are expected to report all accidents to a dispatcher immediately.

1. Stop the vehicle immediately except in situations where, in the interest of customer safety, the vehicle proceeds to a safe location to pull off the road (fire danger, fast-moving traffic, etc.). Otherwise, do not move the vehicle unless instructed to do so by a dispatcher, General Manager or the police.
2. Report the accident immediately to dispatch. Give your exact location and a brief description of the accident, including the need for medical assistance in the event of injury. The dispatcher, in order to assist drivers in following accident procedures and in collecting customer information, will use an accident checklist.
3. Stay at the scene of the accident until investigating officers or Operations Manager or General Manager releases you. It is imperative that drivers account for every customer aboard the vehicle. If a customer insists on leaving the van, do not detain them, but note their description and seating location on the report.
4. If the accident has blocked the roadway, secure the scene by setting out reflective triangles as required by law.
5. It is the driver's duty to care for the personal property of persons injured regardless of whether or not they are CCATD customers. The names of individuals witnessing the securement of personal property by the driver should be obtained. Such personal property will be turned over to a police officer at the scene.
6. No driver shall make any statement regarding responsibility for an accident. The driver shall discuss an accident only with police officers or management. The operator has the right to request to talk to police officers privately or to wait until a Transit Manager arrives.

7. Drivers are responsible for filing all applicable reports. In addition to CCATD Incident/Accident and Accessibility reports, Oregon State accident reports must be filed on accidents. An Oregon State Accident Report form must be filed when a collision results in injury.

The Operations Supervisor is responsible for conducting on-scene investigations of accidents and incidents. Depending on the severity and the nature of the event, various mechanisms will be used for preserving evidence. These may include digital photography, bus video, field sketches, interviews, and observations.

Investigation

An attempt will be made to complete the investigation of most accidents within three days. The Operations Supervisor will complete an Accident/Incident Report. Operators are required to complete an Accident Information Report. The Operations Supervisor is required to file both reports electronically as well as a hard copy and attach all relevant media for future use.

A Report of Injury Form must be completed if an employee suffers an injury or illness as a result of an accident or incident. An 801 Form must be filed if medical treatment is necessary.

Accident Review Process

Accidents and Incidents are classified as Preventable or Non-Preventable.

Preventable accidents are defined as those accidents that could have been reasonably avoided if the operator had followed all defensive driving techniques as established by the CCATD Procedures and Policies.

After reviewing all related documents and evidence, the investigating Operations Manager will make an independent preliminary determination of whether the accident was preventable.

The final accident determination will be made by the Safety Committee. The committee will meet a minimum of once monthly.

The Committee will follow all policies, procedures, and definitions as established in the Safety Committee By-Laws. Examples of investigations may include reviews of accident and injury reports, vehicle condition reports, witness statements, employee interviews, accident scene sketches, bus videos, physical evidence, training manuals, and accident site visits. Employees who are not in agreement with the Committee's determination can appeal directly to the Committee by providing additional evidence and testimony. If the employee is not in agreement with the appeal results, he or she can make a second and final appeal to the General Manager/Accountable Executive. The General Manager may review all relevant information, interview the employee making the appeal, interview Safety Committee members, and confer with any available person or resource he or she considers valuable to his or her deliberation.

Hazard Resolution

The primary purpose of the Accident Investigation process is to determine the cause(s) of accidents so that they may be prevented or mitigated in the future. To this end, it is crucial that all relevant staff be appropriately involved in the process. A serious attempt is made to use lessons learned through the investigatory process to incorporate hazard resolutions into future procedures, designs, construction, modifications, training, and procurements.

Follow-up

Follow-up in the form of corrective actions is the responsibility of the General Manager. The responsibility may be delegated to the Operations Manager.

Any disciplinary action will be assessed using the Employee Handbook. Disciplinary consequences for accidents may include warnings, suspensions, and discharge.

Training will be provided, in most cases, for employees who have been involved in two preventable accidents within one year. Training and re-training are not disciplinary in nature.

Internal Reporting

The Operations Manager is responsible for ensuring that all accident reports are completed and filed with Human Resources and the insurance agent. Human Resources will advise on the history of the employee if a pattern of safety events is evident.

Documentation

Human Resources and CSO maintain the accident investigation documentation.

Performance Measures

Through a series of performance measures relative to operations, maintenance, and safety, CCATD can monitor the system's safety by identifying trends and gaps in policies, procedures, training, and monitoring efforts. The following performance measures will be collected on a daily, monthly, and quarterly basis once the new software is operational.

Maintenance

- ◆ **Preventive Maintenance On-time Inspection Percentage** – determines the effectiveness of the maintenance department to ensure all inspections are conducted per manufacturing and CCATD mileage intervals.
- ◆ **Vehicles Removed From Revenue Service** – tracks vehicles removed from service due to a mechanical defect developed while in service requiring immediate service either on-site of failure or once returned to the facility.
- ◆ **Annual Vehicle Condition Assessment** – through annual inspection, determines on a scale of 1-5 the overall condition of the asset. This performance measure is also used in annual updates of CCATD's Transit Asset Management Plan.

Operations

- ◆ **Customer Complaints Per Month** – tracks all customer complaints to identify areas of deficiency with vehicle, driver or other CCATD areas. Safety-related complaints are immediately routed to the Operations Manager for investigation mitigation and response. Complaints may be a result of phone calls, website or CCATD public forums.
- ◆ **On-time Performance** – serves as an indicator of issues with time management, environmental factors, scheduling, and vehicle and driver performance.
- ◆ **On-board Surveys** – conducted annually, allow CCATD to receive rider feedback about bus operator performance, customer service, and vehicle safety.

Safety

- ◆ **Safety Performance Measure: Fatalities** (total number of reportable fatalities and rate per 100,000 revenue miles by mode)
- ◆ **Safety Performance Measure: Injuries** (total number of reportable injuries and rate per per 100,000 revenue miles by mode)
- ◆ **Safety Performance Measure: Miles between road calls.**
- ◆ **Safety Performance Measure: System Reliability** (mean distance between major mechanical failures by mode)

Safety Promotion

Operator Selection

Selecting applicants best suited to excel at the Bus Operator job requirements is critical to safe transit operations. The transit Bus Operator is directly responsible for the safety of not only the passengers, but also the pedestrians, bicyclists, drivers, and all others who share the road with the transit vehicle. CCATD's hiring process includes the following components:

Applications

Applicants are sought through postings in traditional and culturally diverse media, postings distributed to other transit districts in the region, referrals from current employees, and applications filed by prospective candidates when there are no positions available. The applications are screened by key personnel in Human Resources and Transit Operations.

Interview

After application reviews, applicants are then interviewed by the Operations Manager. The interview process is designed to evaluate a candidate's strengths in customer service, the ability to simultaneously perform tasks, conflict resolution, and the ability to perform well under pressure.

Driving Record

To be eligible for hire, a candidate must submit an acceptable driving abstract dating back five years. The minimum age to be hired as a bus operator is 21 years old.

Licensing

To be eligible for hire, a candidate must possess a Valid Class “B” or “C” Driver’s License.

Criminal Background Check

To be eligible for hire, a candidate must submit to a Criminal Background Check administered by the Oregon State Police with the Federal Bureau of Investigation. The results must meet all statutory and CCATD standards for the Bus Operator position.

Drug Testing

To be eligible for hire, a candidate must produce a negative result for a pre-employment drug test. *(See Appendix 2- Drug and Alcohol Policy Effective January 20, 2020.)*

Physical Capacities

To be eligible for hire, a candidate must be able to perform the essential functions of the job.

Training

There will be a formal training program for Bus Operators. Training will include:

- CCATD Public Transportation Agency Safety Plan training
- Safety Training & Rural Transit Learners Guide training
- Human Resources Policies and Procedures
- Drug and Alcohol Policy
- On the job training

The safety component of training will be designed to make employees aware of the hazards associated with their jobs and the appropriate methods for controlling these hazards. The training will be intended to motivate employees to work safely. Trainings will fall into three main categories:

- (1) Initial
- (2) Periodic
- (3) Remedial or Refresher

Initial Bus Operator Training

New Bus Operators will receive a minimum two-week training course that will cover every aspect of their new job. Some components of the training will be delivered in the classroom. The majority of learning will occur on the buses during off-route and on-route training. The items listed below may be found in the START learner’s Guide and includes, but is not limited to, the following areas:

PART I: VEHICLE SAFETY

- The Pre-Trip Inspection
- En Route Inspection
- Post-Trip Inspection
- Exercises & Exam

PART II: DRIVER/OPERATOR SAFETY

- Physical and Emotional Conditions

- Basic Vehicle Control
- Adverse Conditions
- Cell Phone Use and Radio Communications
- Safety Belts
- Additional Resources for Defensive Driving Training
- Exercises & Exam

PART III: PASSENGER SAFETY

- Safe Boarding of Ambulatory Passengers
- Safe Boarding of Non-ambulatory Passengers
- Transit Security
- Crisis Management
- Passenger Relations
- Exercises & Exam
- Sample Pre-Trip Forms
- Sample Post-Trip Forms
- Defect Report Forms
- Q&A Concerning Wheelchairs and Bus and Rail Service
- Instructions for Securing Motorized Wheelchairs and Scooters

On-route training will provide real service experience with an Operator on both modes of service. The time the new employee operates the revenue route will be increased daily. Each day the student will receive a full review and debriefing from his or her instructor. The Instructor will communicate with the operator and trainee regarding additional training that might be necessary. Rotation among the Operators will provide each student with experience across a variety of routes, vehicles, times of day, instructional styles, and driving conditions.

Periodic Bus Operator Training

How to use this training- These training cards are designed so that each card can stand alone or be completed in a series, allowing the instructor to move at a pace and style that suites specific training needs. They can be completed sequentially within a topic area or the instructor may pull out particular cards to refresh drivers on problem areas as they arise. This refresher training program was created by The Rural Transit Assistance Program to be flexible so that the material can be used by each system to create a program that addresses its particular training needs.

New training cards may be crafted by the instructor by using this Microsoft Office Publisher template below. <https://www.nationalrtap.org/Resource-Center/Advanced-Search/fid/461>

Most components of the periodic training will be delivered in the classroom using the RTAP "2 The Point Training". The training will include, but not limited to, the following areas:

- 1 ADA and Sensitivity
- 2 Blood borne pathogens
- 3 Defensive Driving

- 4 Distracted Driving
- 5 Customer Service
- 6 Passenger Safety
- 7 Non-Ambulatory Passengers
- 8 Drug and Alcohol
- All Periodic training material may be found at the following location-
<https://www.nationalrtap.org/Training/2-the-Point-Training>

Annual 60 minute Drug and Alcohol Awareness video (link below)
<https://transit-safety.fta.dot.gov/DrugAndAlcohol/Tools/DrugAwarenessVideo/>

Refresher (Annual) Training for All Bus Operators

Every year, each Bus Operator will receive one full day of refresher and topical training. The training will address, but not be limited to, the following topics:

- Annual 60-minute Drug and Alcohol Awareness video (link below)
<https://transit-safety.fta.dot.gov/DrugAndAlcohol/Tools/DrugAwarenessVideo/>
- Cell Phone Use and Radio Communications (START Learner's Guide)
- Defensive Driving (RTAP)
- ADA and Sensitivity (RTAP)
- Blood borne pathogens (RTAP)
- Distracted Driving (RTAP)
- Customer Service (RTAP)
- Passenger Safety (RTAP)
- Non-Ambulatory Passengers (RTAP)

System Modification Design Review and Approval

The CCATD bus system may be modified in response to operational experience, and changes in service levels. CCATD's philosophy is to use appropriate new technologies to benefit the environment and the community it serves. The challenge is to review any proposed modification adequately before it is approved. Any proposed modification should be evaluated to ensure it is compatible with existing systems and does not introduce new hazards to the system or reduce the effectiveness of existing hazard controls.

Equipment modifications may be proposed by any employee that uses the equipment. Changes may also occur from an analysis of reliability performance, historical data, and available improvements in equipment design and components.

Routes

Route modifications are designed by the General Manager and Operations Manager. They may use a current Bus Operator to test routing and bus stop placement. This experience-based, real-world process is designed to protect the safety of the transit bus, transit passengers, other vehicles, and pedestrians.

A route modification may be based on input from individual Bus Operators through the Hazard Reporting Form, direct communication, and periodic surveying of Operators conducted by Management.

Appendix 1 Hazard identification and resolution and form for reporting a hazard

Hazard identification and resolution

Hazard management is a mechanism by which a hazard is identified, analyzed for potential impact on the operating system, and resolved in a manner acceptable to the management and regulatory agencies. CCATD's hazard management consists of three primary components – hazard identification, hazard categorization, and hazard resolution.

Hazard Identification

Hazard identification methods:

- Hazard reporting form submitted
- TV or radio announcements
- Weather forecasts
- Etc.

Hazard Categorization

Once a new hazard has been identified, the CSO will categorize the hazard based on severity and probability of occurrence.

Hazard severity is a subjective measure of hazard, supported by factual data, and will be categorized as follows –

- Catastrophic – Death or system loss
- Critical – Severe injury, severe occupational illness, or major system damage
- Marginal – Minor injury, minor occupational illness, or minor system damage
- Negligible – less than minor injury, occupational illness, or system damage

Hazard probability is a subjective measure of likelihood that a specific hazard will occur and will be categorized as follows –

- Frequent – Likely to occur frequently
- Probable – Likely to occur several times
- Occasional – Likely to occur sometime
- Remote – Unlikely but possible to occur
- Improbable – So unlikely that it can be rejected from consideration

Hazard Resolution

Once the hazards are identified and categorized, subsequent analysis will be undertaken to resolve the issue and minimize risk associated with the identified hazard. A hazard resolution matrix will be developed combining hazard severity and hazard frequency, as shown in the matrix on the following page, to identify the level of acceptance for a specific hazard/risk.

Hazard Resolution Matrix	Catastrophic	Critical	Marginal	Negligible
Frequent	Unacceptable	Unacceptable	Unacceptable	Acceptable with reservation

Probable	Unacceptable	Unacceptable	Undesirable	Acceptable with reservation
Occasional	Unacceptable	Undesirable	Undesirable	Acceptable
Remote	Undesirable	Undesirable	Acceptable with reservation	Acceptable
Improbable	Acceptable with reservation	Acceptable with reservation	Acceptable with reservation	Acceptable

The results of the analysis will be shared by the CSO with the General Manager on an ongoing basis to identify appropriate actions. All “unacceptable” hazards must be eliminated and measures will be taken for the remaining risk acceptance categories to minimize risk. The results of such analysis will be shared with law enforcement as may be appropriate.

Example:

1. Weather forecast of freezing rain and snow for an outlying area on the Florence route for the next day.
 - a. Severity = Catastrophic
 - b. Probability = Occasional
 - i. The Hazard analysis would be “Unacceptable” and therefore the hazard must be eliminated. (The route would be cancelled for the duration of the weather event)

2. A local news broadcast reports a bank robbery took place within ½ mile of a bus route 30 minutes ago. The suspects fled the scene in a stolen car at a high rate of speed. Police did not close any streets and do not recommend any special precautions at this time. A citizen called the office to report the facts described above and asked if the bus was still running in the area. (*What is the likelihood of damage to the bus in this case?*)
 - a. Severity = Negligible
 - b. Probability = Remote
 - c. The Hazard analysis would be “Acceptable.” The driver would be notified and advised to be on the lookout for any vehicles operating in an unsafe manner until further notice.

3. Road construction on a major road used by a bus on a daily basis caused a planned detour through a narrow street causing a difficult right turn just past the detour. (*What is the likelihood of damage to the bus in this case?*)
 - a. Severity = Negligible
 - b. Probability = Frequent
 - i. The Hazard analysis would be “Acceptable with reservation” and measures will be taken to minimize risk. (The route would be moved to a detour without a difficult right turn)

Service interruptions

Any hazard resolution matrix result (other than acceptable) may result in temporary changes to service. The service changes may include but not be limited to:

1. A reduction or change in fixed route service.
 - a. One or both fixed routes may be changed to deviated fixed route service.
2. A reduction or change in paratransit service.
 - a. If both fixed routes are changed to deviated fixed routes, ADA paratransit service will not be required or provided.
3. A reduction or change in the service area.
4. A reduction or change in the days and or hours of service.
5. The General Manager will implement such temporary changes as may be necessary.
6. The General Manager will:
 - a. Notify the CCATD Board of Directors as soon as possible
 - b. Have notices posted in all buses
 - c. Notify news organizations, newspapers, etc as soon as possible.

CCATD Form for reporting a hazard or other safety concern

To the employee: Complete the section below and return to a safety committee representative.

Employee name (optional):

Date:

Work unit:

Work section:

Describe the hazard or your concern. (Be specific.):

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Safety committee follow-up:

Action taken:

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Follow-up action:

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Completion date:

Appendix 2 Drug and Alcohol Policy Effective January 20, 2020

Appendix 3 Safety Committee By-Laws

Coos County Area Transportation District (CCATD) Safety committee bylaws

The name of this safety committee will be the Coos County Area Transportation District (CCATD) Safety Committee

Purpose

The purpose of this safety committee is to bring all CCATD employees together to achieve and maintain a safe, healthful workplace.

Goal

The goal of this safety committee is to eliminate workplace injuries and illnesses by involving employees and managers in identifying hazards and suggesting how to prevent them.

Objectives

The safety committee has four objectives:

1. Involve employees in achieving a safe, healthful workplace.
2. Promptly review all safety-related incidents, injuries, accidents, illnesses, and deaths.
3. Conduct quarterly workplace inspections, identify hazards, and recommend methods for eliminating or controlling the hazards.
4. Annually evaluate the CCATD workplace safety and health program and recommend improvements to management.

Representatives

The safety committee will have four (4) voting representatives. Two representatives will represent employees and two will represent management. Employee representatives can volunteer, or their peers can elect them. Management representatives will be selected by management.

Each representative will serve a continuous term of at least one year. Terms will be staggered so that at least one experienced representative always serves on the committee.

Officers

The safety committee will have two officers: chair and vice-chair. One officer will represent labor and one officer will represent management.

Terms of service

Chair and vice-chair each will serve a one-year term.

Duties of the chair

- Schedule regular committee meetings.
- Develop written agendas for conducting meeting.
- Conduct the committee meeting.
- Approve committee correspondence and reports.
- Supervise the preparation of meeting minutes.

Duties of the vice-chair

- In the absence of the chair, assume the duties of the chair.
- Perform other duties as directed by the chair.

Election of chair and vice-chair

The election of a new chair or vice-chair will be held during the monthly committee meeting before the month in which the incumbent's term expires.

If the chair or vice-chair leaves office before the term expires, an election will be held during the next scheduled safety committee meeting; the elected officer will serve for the remainder of the term.

Training

New representatives will receive training in safety committee functions, hazard identification, and procedures for investigating accidents. OR-OSHA will provide training through its occupational safety and health workshops and online courses.

Meetings

The safety committee will meet the first week of each month, except when the committee conducts quarterly workplace safety inspections.

Attendance

Each representative will attend regularly scheduled safety committee meetings and participate in quarterly workplace inspections and other committee activities. Any representative unable to attend a meeting will appoint an alternate and inform the chair before the meeting. An alternate attending a meeting on behalf of a regular representative will be a voting representative for that meeting.

Agenda.

The agenda will state the order in which the safety committee conducts its business. The agenda also will include the following when applicable:

- A review of new safety and health concerns
- A status report of employee safety and health concerns under review
- A review of all workplace near misses, accidents, illness, or deaths occurring since the last committee meeting.

Minutes.

Minutes will be recorded at each safety committee meeting and be distributed by memo to all company employees.

The committee will submit a copy of the minutes to the CCATD employee services office; the office will retain the copy for three years. All reports, evaluations, and recommendations of the committee will be included in the minutes. The minutes also will identify representatives who attended monthly meetings and representatives who were absent.

Voting quorum.

Three voting representatives constitute a quorum. A majority vote of attending representatives is required to approve all safety-committee decisions. Issues not resolved by majority vote will be forwarded to management for resolution.

Employee involvement

The safety committee will encourage employees to identify health and safety hazards in the workplace. Concerns raised by employees will be presented to the committee in writing; the committee will review new concerns at the next regularly scheduled monthly meeting.

Safety log

The committee will maintain a log of all employee safety concerns, including the date received, recommendations to management, and the date the concern was resolved.

Response

The committee will respond to employee concerns in writing and work with management to resolve them. The committee will present written recommendations for resolving concerns to management. Within 60 days of receiving the written recommendations, management will respond in writing to the committee indicating acceptance, rejection, or modification of the recommendations.

Incident and accident investigation

The safety committee will review new safety- or health-related incidents at its next regularly scheduled meeting. Safety-related incidents include work-related near misses, injuries, illnesses, and deaths. When necessary, the committee will provide written recommendations to management for eliminating or controlling hazards.

Workplace inspections

The safety committee will conduct quarterly workplace inspections.

Written report

The committee will prepare a written report for management that documents the location of all health or safety hazards found during inspection. The report will recommend options for eliminating or controlling the hazards.

Within 60 days of receiving the written report, management will respond in writing to the committee, indicating acceptance, rejection, or proposed modification of the recommendations.

Evaluation

The safety committee will evaluate the CCATD workplace safety and health program annually and provide a written evaluation of the program to management.

The committee will also evaluate its own activities each January and use the evaluation to develop an action plan for the next calendar year.

Appendix 4 RTAP “2 The Point”

- (1) ADA and Sensitivity
- (2) Bloodborne pathogens
- (3) Defensive Driving
- (4) Distracted Driving
- (5) Customer Service
- (6) Passenger Safety
- (7) Non-Ambulatory Passengers
- (8) Drug and Alcohol