



Senior Resource
ASSOCIATION

Promoting Independence in our Community

Public Transportation Agency Safety Plan (PTASP)

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Transit Agency Information

	Senior Resource Association, Inc. (Goline and Community Coach)		
	4385 43 rd Ave., Vero Beach, FL 32967		
	Karen Deigl, President & CEO		
	Chris Stephenson, Director of Transportation		
	Bus Transit, Fixed Route and Paratransit		5307, 5310, 5311
	Bus Transit, Fixed Route and Paratransit		
	Yes		SRA has a contract to provide Public Transportation for Indian River County through at least 2024
	Indian River County		

Records of Revision

Note: Retain this record in the manual and update at every revision change or on cycle, whichever comes first.

Revision Number	Dated	Filed By
Original		Chris Stephenson
#1	01/15/2021	Chris Stephenson
#2	01/15/2022	Chris Stephenson
#3	06/01/2022	Chris Stephenson
#4	1/15/2023	Chris Stephenson
#5	1/15/2024	Chris Stephenson
#6	7/15/2024	Chris Stephenson
#7	1/22/2025	Chris Stephenson

Master List of Updates

The below noted updates are incorporated into this manual:

Original	Revisions	Update Details
		Not Applicable – Original
	1	Added Certifications for 2021
	2	Added Certifications for 2022 and updated contact info
	3	Added Infectious Diseases addendum
	4	Added Certifications for 2023 and updated contact info
	5	Added Certifications for 2024 and updated contact info
	6	Added section about assessing, mitigating and monitoring risks related to assaults on transit workers.
	7	Added Certifications for 2025 and updated contact info



Senior Resource
ASSOCIATION
Promoting Independence in Our Community

PTASP Certification

ANNUAL SAFETY CERTIFICATION AND ADOPTION

Date: January 22, 2025

Name: Senior Resource Association
Indian River Transit
GoLine
Community Coach

Address: 4385 43rd Avenue
Vero Beach, Florida 32967

In accordance with FTA 49 CFR Part 673 Final Rule, the Board of Directors of the bus system named above hereby adopts and certifies to the following:

1. The adoption of the Safety Management System for calendar year 2025
2. Compliance with adopted standards of the Public Transportation Agency Safety Plan (PTASP), for calendar year 2025
3. Performance of safety inspections on all buses operated in accordance with Rule 14-90.009, for calendar year 2025

Signature _____

Name: Lisa Thompson Barnes
Title: Chair of the Board of Directors, Senior Resource Association

Signature _____

Name: Karen B. Rose Deigl
Title: Chief Executive Officer, Senior Resource Association

List of Acronyms:

ACC/INC: Accident/Incident
ALARP: As Low as Reasonably Practicable
CAP: Corrective Action Plan
FDOT: Florida Department of Transportation
FHR: Final Hazard Rating
FTA: Federal Transportation Administration
IHR: Initial Hazard Rating
NTD: National Transit Database
OSHA: Occupational Safety and Health Administration
SMS: Safety Management System
SOP: Standard Operating Procedure
SSP: System Security Plan:
SSPP: System Safety Program Plan (replaced by PTASP)

Definitions:

As Low as Reasonably Practicable – A condition where a risk/hazard has been mitigated to its lowest manageable level.

Accident – an event that involves any of the following: Loss of life, serious injury to a person, collision involving a transit vehicle, an evacuation for life safety reasons.

Hazard Report – A report filed regarding a hazard identified in the workplace.

Disposition Period – Time between knowledge of an incident and the when employee is found culpable or not.

Accident/Incident/ Occurrence Report – A report filed regarding an event.

Hazard – a potential source of danger.

Near Miss – a narrowly avoided collision or other accident.

Event – an accident, incident or occurrence

Incident – an event that involves any of the following: Personal injury that is not serious, one or more injuries requiring medical transport, damage to the facilities, equipment or infrastructure that disrupts the operations of the agency.

Occurrence – an event without any personal injury in which any damage to facilities, equipment, facilities or infrastructure does not disrupt operations.

Investigation – a formal inquiry or systematic study

Risk – a situation involving exposure to danger.

Risk Assessment – A systematic study or examination/assessment of a risk.

Safety Management System – A business-like approach to managing safety in the workplace.

Training – the action of teaching a person or animal a particular skill or type of behavior.

1. Safety Management System Introduction and Performance Targets

This manual establishes the SMS policies for all transportation employees of Senior Resource Association. This manual will be reviewed and updated, as applicable, annually.

Immediate changes to this manual may be authorized by the CEO. Senior Resource Association will communicate immediate changes to all concerned through email and bulletin board postings. Senior Resource Association's SMS has been established consistent with business needs and regulatory impetus. The SMS is designed to identify, assess, track, control, minimize and resolve hazards. Senior Resource Association's SMS will be used as a means of preventing injuries, incidents, system disruption, accidents, environmental damage and other losses.

Objectives:

- Reducing transit safety, employee, and environmental risks by better managing safety risks and setting goals to eliminate or reduce risks.
- Communication of safety risks to employees and their roles and responsibilities related to risks.
- Increase awareness of safety issues at all levels of the company, thereby providing a better framework/structure for management to play a leadership role in addressing safety concerns.
- Continuous improvement of risk controls.
- Compliance with all applicable state and federal regulations.
- Foster a culture where safety issues are identified and risks are eliminated or reduced in the planning process and delays or other impediments to business goals are avoided.

SMS Performance Targets:

Safety Concerns	Rate	Goal
Preventable Accidents	per 100,000 miles:	<0.1
Injuries	per 100,000 miles:	<0.1
Fatalities	per 100,000 miles:	0
Safety Events	per 100,000 miles:	<0.1
System Reliability	Mean distance between Mechanical failure	<42,500 miles
Pedestrian Collisions	per 100,000 miles:	0
Vehicular Collisions	per 100,000 miles:	<0.1
Assaults on Transit Workers	per 100,000 miles:	0

- These performance targets will be made available to the Florida Department of Transportation to aid in the planning process.
 - These performance targets will be made available to Indian River County Metropolitan Planning Organization (MPO) to aid in the planning process
 - SRA will coordinate with the state and MPO to select statewide and local safety performance targets
-

System Description:

The GoLine, operated by the Senior Resource Association, is Indian River County's public transportation system. It provides 14 fixed routes throughout the county and also includes service to Indian River State College in Ft. Pierce. The GoLine makes it possible to get almost anywhere in the county without the use of a motor vehicle. GoLine picks up and delivers approximately 4,500 people to work, play, school and other destinations every day. Last year, GoLine provided 1,357,438 trips to citizens of Indian River County. Community Coach is the door-to-door paratransit service offered to eligible Americans with disabilities and transportation disadvantaged individuals. Community Coach is used to transport individuals to the grocery store, doctor appointments, social gatherings and much more. Last year, Community Coach provided approximately 45,000 trips to individuals in Indian River County. Today's fleet of 23 GoLine buses and 18 Community Coach vehicles cover more than 4,700 miles daily. Senior Resource Association is governed by a Board of Directors. Senior Resource Association has helped to make the Treasure Coast area a more livable community and minimizing the stress associated with commuting.

Services Provided:

We provide non-emergency transportation (NET) services for state and federal programs, consistent with the requirements of various FDOT and FTA grant requirements.

System Profile (1/6/2025):

Total Number of drivers: 65

Full-time: 42

Part-time: 23

Number of operational buses: 41

Buses W/C accessible: 41

Number of Type I buses (>22' length): 20 Type II buses (<22' length): 21

Dispatch & Maintenance Location(s):

4385 43rd Avenue

Vero Beach, FL, 32967

Community Transportation Coordinator (CTC): Yes X No _____

CTC Operator: Yes X No _____

2. Safety Responsibilities

Purpose: To establish accountabilities for safety operations.

Organizational Levels and Roles:

CEO/Accountable Executive: Provides strategic direction for safety policy, risk mitigation, safety assurance and promotion.

Chief Safety Officer: Provides leadership in the operation and performance of SMS, develops and implements innovative strategies that foster continuous SMS improvement in a manner that supports departmental, customer and corporate business plans, goals and objectives.

Safety and Training Supervisor: Manages function related to all maintenance activities, site level facilities activities, and operational safety.

All Personnel

- Conduct work in the safest manner possible in accordance with approved site procedure, policies and in a manner that enhances their own/other employees' health and safety.
- Promotes risk reduction, participates openly in safety related events investigations and immediately report workplace hazards and make suggestion for control of reported hazards.
- Contribute to the overall success of the SMS program at the site level.

Senior Resource Association's SMS Contacts

Name	Role	Contact Information
Karen Deigl	CEO/Accountable Executive	772-473-2935
Chris Stephenson	Transportation Director, Chief Safety Officer	772-532-0396
Joe Storey	Safety & Training Supervisor	772-539-2340
Clarissa Powers	Fixed Route Supervisor	772-539-1912
Holly Seeton	Paratransit Supervisor	772-480-3419
Gabe Pedrero	Chief Financial Officer	772-269-0101
Kate Broomell	Director of Human Resources	772-633-7506

Roles and Responsibilities

Accountable Executive Role and Responsibilities

The Senior Resource Association Executive Director is designated the Accountable Executive for the SMS. The Executive Director is accountable for ensuring that the SMS is effectively implemented and resourced throughout Senior Resource Association, and for ensuring action is taken, as necessary, to address any degradation in safety performance at Senior Resource Association.

Chief Safety Officer Role and Responsibilities

The Transportation Director has been designated as the SMS Executive. The Transportation Director is responsible for:

- Facilitating full implementation of the SMS across Senior Resource Association;
- Advocating for a safety culture;
- Conducting strategic planning for the SMS;
- Managing and updating SMS processes based on experiences and lessons learned;
- Reviewing and updating this SMS and Implementation Plan and PTASP at least annually;
- Providing additional guidance material (as required) to further strengthen and clarify the SMS processes;
- Monitoring the safety performance of Senior Resource Association operations and activities through formal data collection and analysis; and
- Tracking safety-critical issues and corrective actions to conclusion, using appropriate tracking systems.
- Leading internal safety audits with support from appropriate Senior Resource Association employees;

Directors, Managers Roles and Responsibilities

All directors and managers are accountable and responsible for:

- Upholding and promoting safety policies, and safety risk management, safety assurance, and safety training and communication protocols;
 - Fostering a strong safety culture within their department;
 - Allocating the appropriate staffing resources necessary to become compliant with and maintain compliance with the SMS requirements
 - Identifying the necessary funds to meet the safety performance requirements and incorporate them into budgeting plans, prioritizing and allocating expenditures according to safety risk.
 - Implementing the safety risk management, safety assurance, and safety training and communication protocols of their department;
 - Safety performance within their functional areas;
 - Ensuring procedures are consistent with the SMS;
 - Determining and implementing countermeasures required to counteract safety risks and manage issues that negatively impact Senior Resource Association safety performance;
-

3. Safety Policy

SMS Safety Policy Statement

Safety and customer service are our two core business functions. Senior Resource Association is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all our transit service delivery activities take place under a balanced allocation of organizational resources aimed at achieving the highest level of safety performance and meeting established standards. All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the Chief Executive Officer (CEO). The SMS Program is managed under my authority by the Director Transportation.

Senior Resource Association'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 and encourages effective employee safety reporting and communication.
- **Integrate** the management of safety among the primary responsibilities of all employees;
- **Clearly define** for all staff, responsibilities for the delivery of the safety performance;
- **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, in order to eliminate or mitigate the safety risks of the consequences of hazards to a point which is consistent with our 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, or a deliberate or willful disregard of regulations or procedures;
- **Comply with**, and exceed, legislative and regulatory requirements and standards;
- **Ensure** that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters
- **Establish** and measure safety performance against realistic & data-driven indicators and targets
- **Continually improve** our safety performance through management processes that ensure that appropriate safety management action is taken and is effective;

Values and guiding principles

- Integrity, Trust, Teamwork, Respect, Customer Service
- Commitment to Safety
- Commitment to Continuous Improvement
- Commitment to Compliance



Karen Deigl
CEO and Accountable Executive

4. Safety Culture

Safety Culture Policy:

Senior Resource Association is committed to creating and sustaining a safety culture environment that supports our SMS and recognizes that a number of principles enable the development and sustainment of a positive safety culture including:

- Recognition that fair and equitable treatment of all employees encourages sharing of safety-related information.
- Creating and sustaining an environment that actively seeks out risks and supports hazard and event reporting, to include near misses.
- Recognition that inappropriate disciplinary measures can suppress open reporting of risks.
- Creating and sustaining an environment where there is an understanding that human errors will occur.
- Creating and sustaining an environment that promotes openness and learning from events at Senior Resource Association, there is an expectation that all employees actively promote safety in everything they do. This includes two explicit duties that are the responsibility of all employees:
 - To report any hazard, near-miss, unsafe condition or incident that occurs, or is otherwise known about.
 - To openly participate in any investigation that may arise as a result of any reported hazard, near-miss or event that occurs

Senior Resource Association recognizes that employee actions that contribute to hazards and events may be the result of a wide spectrum of behaviors. The Senior Resource Association policy regarding these behaviors is as follows:

- Unintentional error will be investigated, and feedback given
- At-Risk behavior will usually warrant a verbal or written counseling
- Reckless behavior (and some circumstances of at-risk behavior) will usually warrant more significant corrective action steps to be taken

We are committed to creating an open and fair safety culture with Senior Resource Association that supports our SMS. As we implement this policy, we pledge that our first response to any event **will be to investigate fairly the circumstances involved.**



Karen Deigl, *CEO and Accountable Executive*

5: Risk Management

The next component of SMS is Risk Management; describing how Senior Resource Association identifies, evaluates, tracks and mitigates hazards/risk in the organization and on the transit system. Acceptable risk levels and mitigation measures are established.

The management of identified hazards is a vital component of the Senior Resource Association's Safety Management System.

- A **hazard** is defined as *a condition or set of conditions, internal or external to the Senior Resource Association system, which when activated could cause injury, death, damage or loss of equipment or property.*
- An **unacceptable hazard** is *a condition that may endanger human life, property or result in system loss.* This includes harm to:
 - passengers
 - employees
 - contractors
 - equipment
 - and to the general public.

These hazardous conditions must be mitigated or eliminated. Hazards may be observed in the operating environment, through procedures, during system modifications and capital projects, accidents, extensions or operational changes.

Hazard Management Program:

The Hazard Management Program applies to all Senior Resource Association employees and obligates everyone to constantly observe hazards in their work areas and report them to the Safety & Training Department or to their supervisor and/or manager.

The overall hazard management program incorporates a system-wide hazard identification process, including activities for:

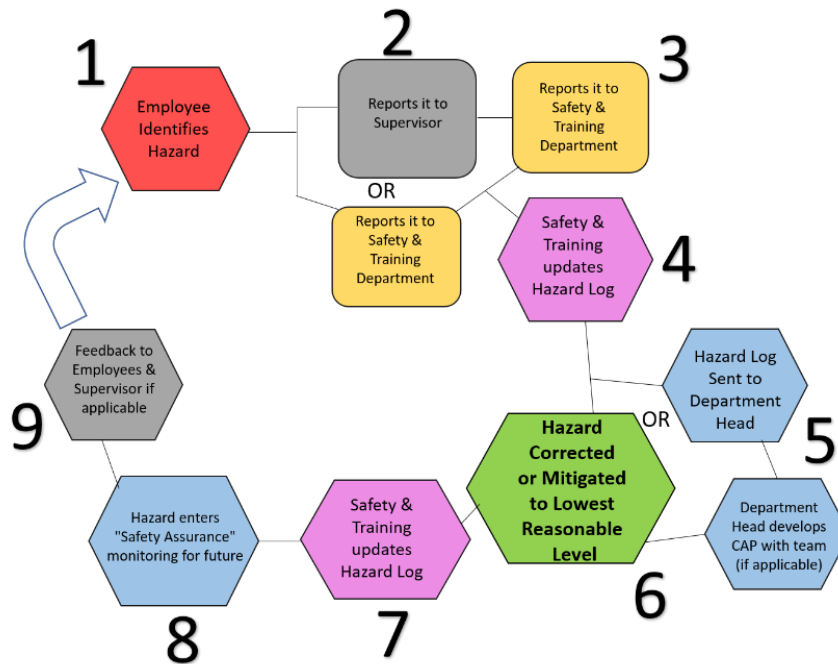
- a. Identification
- b. Investigation
- c. Evaluation and analysis
- d. Mitigate or elimination
- e. Tracking

Senior Resource Association Department Managers/Directors play a key role in the hazard management process. Managers ensure the following elements of the hazard management process are present in their departments:

- a. Ensure employees have the ability to report hazards to management in person or through the use of written accident/incident forms;
- b. Ensure hazards are placed on a hazard log for tracking and documentation;
- c. Ensure employees receive appropriate hazard management training.

The following lays out an overall description of how hazards are identified, evaluated, analyzed, controlled or eliminated, tracked and reported to Senior Resource Association senior management.

- a. All employees are expected and encouraged to participate in safety program activities including reporting hazards, reporting unsafe work practices, near misses, and accidents immediately to their supervisor or a safety representative.
- b. The Safety & Training Department is the primary points of contact (POC) for the hazard management process.
- c. Safety will enter identified hazards into the hazard log and forward the hazard report to the responsible department. The responsible department assigns a hazard rating.
- d. The responsible department is responsible for developing a (CAP) Corrective Action Plan (if applicable) for the unacceptable and undesirable hazard.
- e. CAP's may also be identified as a result of an incident or investigation.
- f. Hazards must be mitigated at the lowest level practicable. However, when a hazard is identified as having a mitigation that involves multiple departments or requires cost or changes beyond the department abilities or budgets, the hazard will be elevated to the senior management team. The senior management team represents key department directors and has the capability to employ multiple disciplines at Senior Resource Association while also having access to higher level budgeted solutions.



Hazard Management Flow Chart

Under the SMS employees are asked to be aware of their surroundings, processes, or work areas and to observe and report all hazardous conditions or potentially hazardous conditions to their supervisor. Along with their supervisor, the employee should work to mitigate those hazards. Prevention of hazardous conditions prior to an injury or equipment damage occurring is the goal of SMS. Each hazard is evaluated and assessed as to the potential injury or equipment damage that could occur if a mishap or injury took place. Corrective action that is implemented and hazard mitigation will reduce the hazard frequency or severity. Hazards rated with a High or Serious rating must be mitigated and reduced to an acceptable level.

Step by Step Process:

1) Hazard Identification:

Identification of hazards is the responsibility of all Senior Resource Association employees and contractors. The continuous identification, monitoring, and elimination of hazards is key to an effective system safety program. Hazard identification methods include, but are not limited to the following:

- a. Observation, inspection, and interaction of all Senior Resource Association employees.
- b. Reports from passengers, customer service, etc.
- c. Evaluation of accidents, incidents, near misses
- d. Internal and external safety audits, inspections, observations, defects, findings, observations, violations, and reviews.

Examples of observed hazards may include:

- a. An uneven sidewalk joint that could cause a trip and fall
- b. Opening in a section of corridor fencing which allows access of a trespasser
- c. Missing fire extinguisher

2) Safety Department Hazard Log:

The Safety Department is responsible for the maintenance of the Hazard Log. They ensure that all hazards meeting defined criteria are entered onto the Hazard Log. Hazard rating can be assigned by the Safety Department, department head that owns the hazard or the senior management team.

The following are Specific hazards that are identified and mitigated:

- a. Unacceptable hazards (High Hazards);
- b. Hazards identified from audits from outside agency's (FDOT, FTA, OSHA, the CTD)
- c. Hazards identified from accident investigations;
- d. Hazards where corrective action will cost more than \$25,000;
- e. When warranted by the Safety Department

Hazards identified by an employee to his/her supervisor may be resolved by the employee and supervisor if able. In any case, the supervisor will forward the hazard to a safety representative for entry into the hazard log. Safety will forward the hazard report to the responsible department for review.

3) Corrective Action Plan (CAP):

Corrective action plans are utilized within Senior Resource Association for hazards that meet certain criteria. In the following instances corrective action plans must receive prior approval before corrective action plans may be carried out

- a. Unacceptable hazards (High Hazards);
- b. Audit findings from regulatory agencies resulting in Non-conformance (FDOT, FTA, CTD, OSHA);
- c. Accident investigations requiring corrective action,

CAP's must contain at a minimum:

- a. A person of responsibility for the corrective action
- b. A proposed completion date

Corrective action plans are developed by department managers in conjunction with the Safety Department. Corrective action plans may be tracked on hazard logs.

Senior Resource Association's hazard analysis tables (probability, severity and risk resolution) shown below are used on the Hazard Log to track hazards and the status of their CAP's.

PROBABILITY TABLE

Likelihood	Meaning	Value
Frequent	Likely to occur/ has occurred frequently	5
Occasional	Likely to occur/ has occurred sometimes	4
Remote	Unlikely to occur/ has occurred rarely, but possible	3
Improbable	Very unlikely to occur or no known occurrences	2
Extremely Improbable	Almost inconceivable that this will ever occur	1

Hazard Probability

Generally, hazard probability is described qualitatively in potential occurrences per units of time, miles, trips/runs or passengers carried. A hazard probability may be derived from the analysis of transit system operating experience.

SEVERITY TABLE

Value	Severity	Meaning
A	Catastrophic	Deaths (not including suicide or death by natural causes) Equipment destroyed
B	Hazardous	A large reduction in safety margins: Seriously injury-fracture, severe bleeding, paralysis, Brain injury, Major equipment damage
C	Moderate	A significant reduction in safety margins, Injury bruising, abrasions, bleeding, sprains (ambulance transport)
D	Minor	Nuisance, Operating limitations, Minor incident Minor injury-bruising, abrasion (no ambulance transport)
E	Negligible	

Hazard Severity

Hazard severity is a subjective determination of the worst case that could be anticipated to result from human error, design inadequacies, component failure or malfunction. The categorization of hazards reflects the principle that not all hazards pose equal amounts of risk. The categories are:

- **Catastrophic** - Operating conditions are such that human error, design deficiencies, element, subsystem or component failure or procedural deficiencies may cause death or major system loss and require immediate termination of the unsafe activity or operation
- **Critical** - Operating conditions are such that human error, subsystem or component failure or procedural deficiencies may cause severe injury, severe occupational illness or major system damage and require immediate corrective action.
- **Marginal** - Operating conditions are such that they may result in minor injury, occupational illness or system damage and are such that human error can be controlled.
- **Negligible** - Operating conditions are such that human error, subsystem or component failure or procedural deficiencies will result in less than minor injury or system damage.

Hazard Ratings

Senior Resource Association has adopted a system for assessing the level of risk for each identified hazard to determine what action(s) must be taken to correct or document the hazard risk. This assessment system has been incorporated into the Hazard Log Resolution Table, which enables the decision makers to understand the amount of risk involved in accepting the hazard in relation to the cost (schedule, cost, operations) to reduce the hazard to an acceptable level.

- **HIGH risk** hazards that receive an unacceptable initial hazard analysis made by management, safety committee or the safety administrator receive immediate attention/control. A high hazard rating requires corrective action.
- **SERIOUS** hazards that are undesirable may require corrective action and decisions by management. Hazards that receive a serious hazard rating will remain on the hazard logs no more than 90 days without an approved corrective action plan.
- **MEDIUM** hazards may be acceptable with review by management. Events from a medium hazard are less likely to occur and are less severe in nature.
- **LOW** hazards do not require review and are acceptable.
- **ELIMINATED** hazard is no longer present.

RISK RESOLUTION TABLE

		Risk Severity				
		A	B	C	D	E
Risk Probability		Catastrophic	Hazardous	Moderate	Minor	Negligible
5	Frequent	5A	5B	5C	5D	5E
4	Occasional	4A	4B	4C	4D	4E
3	Remote	3A	3B	3C	3D	3E
2	Improbable	2A	2B	2C	2D	2E
1	Extremely Improbable	1A	1B	1C	1D	1E
Resolution Requirements						
High	Unacceptable			Correction required		
Serious	Undesirable			Correction may be required, decision by management		
Medium	Acceptable W/ review			With review and documentation by management		
Low	Acceptable			Without review		
Eliminated	Acceptable			No Action needed		

4) Hazard Resolution and Elimination

Hazard resolution is defined as the analysis and subsequent actions taken to reduce the hazard to the lowest level practical and the risk associated with an identified hazard. Hazard resolution is not synonymous with hazard elimination. In a transit environment, there are some hazards, which are impossible to eliminate and others, which are highly impractical to eliminate. Reduction of risk to the lowest practical level can be accomplished in a variety of ways from protective and warning devices to special procedures.

1. Design out or design to minimize hazard severity. To the extent permitted by cost and practicality, identified hazards will be eliminated or controlled by the design of equipment, systems and facilities.
2. Hazards that cannot reasonably be eliminated or controlled through design will be controlled to the extent practicable to an acceptable level through the use of fixed, automatic, or other protective safety design features or devices.
3. When design and safety devices cannot reasonably nor effective, eliminate or control an identified hazard, safety warning devices will be used (to the extent practicable) to alert persons to the hazards.
4. Where it is impossible to reasonably eliminate or adequately control a hazard through design of the use of safety warning devices, procedures and training will be used to control the hazard.

5) Hazard Tracking

The safety department will coordinate with the appropriate department to develop a Corrective Action Plan (CAP) for the identified hazard. The CAP form will be placed on the hazard log with the corresponding hazards for tracking purposes. The completed CAP is formally adopted by receiving the department head's signature. The Hazard Log will then be updated to show the status of the identified hazard with its CAP to "CLOSED". Senior Resource Association will monitor all Corrective Action Plans with the use of the Hazard Log and will provide Indian River County MPO with an updated hazard log quarterly. For hazards that receive a medium or low rating, the use of a corrective action is optional depending on the complexity and ability to correct the identified hazard; e.g. clearing shrubs or trimming branches of a tree.

6. Accident/ Incident/ Occurrence Investigation & Reporting

This chapter defines what is considered an accident. It also outlines the actions to be taken by employees in the event of an accident/incident related to Senior Resource Association vehicles, passengers, employees or property in the course of doing business.

The definition of an accident is an event involving any of the following: (Accident/Incident report required)

- Loss of life
- Serious injury to a person
- Collision involving a transit vehicle
- An evacuation for life safety reasons

The definition of an incident is an event involving any of the following: (Accident/Incident report required)

- Personal injury that is not serious
- One or more non-serious injuries requiring medical transport
- Damage to the facilities equipment or infrastructure that disrupts the operations of the agency

The definition of an occurrence is an event involving any of the following: (Accident/Incident report required)

- An event without any personal injury in which any damage to facilities, equipment, or infrastructure does not disrupt operations

The definition of a serious injury is an event involving any of the following: (Accident/Incident report required)

- Requires hospitalization for more than 24 hours
- Results in a fracture of any bone
- Causes severe hemorrhages, nerve, muscle, or tendon damage
- Involves any internal organ; or Involves any second- or third-degree burns

Vehicle Operator Post Accident Immediate Actions:

- Remain calm and assess the situation
- Secure the vehicle (Set Brake & turn on 4-way hazards)
- Contact 9-1-1 if applicable
- Provide dispatch with your exact location, description of accident, number and type of injuries
- Secure the scene (Do not move the vehicle unless directed by emergency responders or Safety/Supervisors. Put out the triangles, assist passengers with first aid if warranted)
- Ask passengers to fill out comment cards and obtain witness statements if available
- Obtain facts about the other vehicles involved and begin filling out accident/incident paperwork
- DO NOT discuss the accident with anyone other than law Enforcement or Senior Resource Association accident investigator/Supervisor.
- DO NOT make any statements concerning liability. Give only information requested by Law Enforcement
- Under no circumstances should an operator leave the scene of an accident prior to the arrival of Law Enforcement unless directed to do so by a supervisor or accident investigator.

Accident Investigator Responsibilities:

- Respond to radio call from driver
- Notify Transportation Director and CEO
- Secure the scene & determine what resources you will need
- Isolate the employee
- View/pull video if able (hard drive)
- Take photos (minimum of 10; including all 4 sides of vehicles, LIC plate # and VIN #), collect witness cards/comment cards, interview witnesses, review video and begin accident/incident paperwork
- Determine if FTA Drug & Alcohol test is required

ALL documents may be used in litigation. Make sure they are legible, completed in full, and submitted to the Safety Department.

As with any investigation, time is of the essence, therefore investigations should proceed as soon as practical to avoid potentially losing valuable information. Only trained investigators are to conduct investigations and under no circumstance may an investigator examine his/her own work area incident/accident.

Preliminary Accident Reports: *(Preliminary Accident reports will be sent as soon as possible after the accident, but not later than three hours of clearing the accident scene)*. All reports will be scanned & sent to the Safety & Training Department. Required documents include accident/incident reports, pictures, customer comment cards or witness statements, police report, refusal of medical treatment forms, Drug and alcohol tests (if required) and any other available information.

NOTE: Accident/Incident reports (employee & investigator) are required to be completed and turned in prior to the end of the employee's shift (of the day of the event). Failure to comply with the Accident/Incident reporting procedure and submission deadlines, outlined above, WILL result in progressive disciplinary action. Furthermore, the operator **will be removed from their bid schedule until such time as the required paperwork is completed and turned in to the Safety and Training Department.**

Accident/Incident Final Report: Should be completed and turned in to Department Heads and HR within 5 days of the accident/incident. The Safety department will be responsible for submitting the final report.

Determinations and Point System

Using the accident/incident final report, the accident/incident determination form will be filled out and scored. The Cumulative violations of four (4) points may result in possible termination.

Each preventable accident/incident will not be held against the employee after 365 calendar days has passed (i.e. if an employee receives a preventable accident/incident on June 1, 2019, it will not be effective after June 1, 2020).

ACCIDENT/INCIDENT DETERMINATION FORM

Employee Name:	Employee Job Title:	Today's Date:
Day of Event:	Day of the week:	Time of event: Am _____ Pm _____
FTA Drug & Alcohol Testing Criteria Met <input type="checkbox"/> PREVENTABLE	FTA Drug & Alcohol Testing Criteria NOT Met <input type="checkbox"/> PREVENTABLE	<input type="checkbox"/> NON-PREVENTABLE
Two (2) Points Assessed <input type="checkbox"/> Fatality: an individual dies	One (1) Point Assessed The employee did not demonstrate enough control over the situation or could have taken more defensive action(s) to prevent: <input type="checkbox"/> Personal injury that is not serious <input type="checkbox"/> One or more non-serious injury <input type="checkbox"/> Damage to the facilities equipment or infrastructure that disrupts the operations of the agency <input type="checkbox"/> Other (meets criteria above of lack of control or defensive action)	No Points Assessed
Two (2) Points Assessed <input type="checkbox"/> An individual suffers serious bodily injury and receives medical treatment away from the scene of the accident. (Individual refers to employees, pedestrians, passenger or person in other vehicle(s)) <input type="checkbox"/> A vehicle incurs disabling damages as a result of the event and a vehicle is transported away from the scene by a tow truck or other vehicle	Half (1/2) Point Assessed An occurrence that does not disrupt operations and the employee's actions directly or indirectly contributed to the event. <input type="checkbox"/> Preventable passenger falls <input type="checkbox"/> Violation of policy or procedure <input type="checkbox"/> Improper use of vehicle (equipment-doors/lift/ramp/etc.) <input type="checkbox"/> Other (explain): _____	No Points Assessed
<input type="checkbox"/> Retraining (Involvement in any preventable accident/incident with points assessed, which does not result in termination, will result in the employee being retrained in the deficient area. List courses or type of re-training required:	<input type="checkbox"/> Retraining (Involvement in any preventable accident/incident with points assessed, which does not result in termination, will result in the employee being retrained in the deficient area. List courses or type of re-training required:	

Investigator's Signature: _____

Date: _____

RE-TRAINING

Involvement in any preventable incident/accident with points assessed, which does not result in termination, will result in the employee being retrained in the deficient area.

Corrective Action

The Safety department reviews all accident & incident reports. The Safety department will also initiate an investigation to determine causal or contributing factors for all events. Findings from the investigation that identify unacceptable hazards, will require a corrective action plan and will be placed on the hazard log. The Safety department will then forward findings to the appropriate departments to develop a corrective action plan (CAP) and fill out a CAP for the identified hazard. The corrective action plan will contain:

- a. Action to be taken
- b. Proposed completion date
- c. Individual or department responsible for implementation

A complete investigation is comprised of the following three stages being completed:

1. Investigation and interview stage: All relevant information is found.
2. Root Cause Stage: Contributing factors and root cause is determined, and information is recorded in Senior Resource Association Investigation Form.
3. Preventative strategies recommendations are prepared and recorded in SMS Report.

NTD Reporting

The Chief Safety Officer is responsible for reporting safety events to the National Transit Database

Non-Rail and Ferry Modes
Fatalities <ul style="list-style-type: none">• confirmed within 30 days• includes suicides
Injuries: Immediate transport away from the scene for medical attention (1 or more persons)
Estimated property damage equal to or exceeding \$25,000

Non-Rail and Ferry Modes
Collisions that <ul style="list-style-type: none">• meet an injury, fatality, property damage, or evacuation threshold;• involve transit revenue roadway vehicles and the towing away of any vehicles (transit or non-transit) from the scene;• include suicides or attempted suicides that involve contact with a transit vehicle; or• do not involve a transit revenue vehicle but meet a threshold.
Evacuations include <ul style="list-style-type: none">• evacuation of a transit facility or vehicle for life-safety reasons.

Major Event Thresholds

Fatality

Agencies must always report S&S events that result in fatalities. For NTD purposes, a fatality is a death due to

- collision (including suicides),
- derailment,
- fire,
- hazardous material spill,
- acts of God,
- system or personal security event (including suicides), or
- other safety event.

Fatalities that occur because of illnesses or other natural causes (including individuals who are found deceased) are not reportable. For example, if a passenger suffers a fatal heart attack in a transit facility or vehicle, the event is not reportable to the NTD.

An agency must report a fatality due to a reportable S&S event if it is confirmed within 30 days of the event. If an agency receives confirmation within 30 days of an event that a person reported as an injury has died due to the event, the agency reports a fatality rather than an injury. This may mean the agency has to update the submitted major event report

For information on Person Type categories, see "Injury and Fatality Type Key Descriptions."

Injury

For both non-rail and rail modes, any damage or harm to persons that requires immediate medical attention away from the scene because of a reportable event must be reported as an injury. Agencies must report each person transported away from the scene for medical attention as an injury, whether or not the person appears to be injured.

For **rail mode events**, in addition to injuries requiring transport from the scene, injuries defined as **serious** are automatically reportable. Individuals with serious injuries may or may not have been transported away from the scene for medical attention. A serious injury is one that

- requires hospitalization for more than 48 hours within 7 days of the event;
- results in a fracture of any bone (except simple fractures of fingers, toes, or nose);
- causes severe hemorrhages, or nerve, muscle, or tendon damage;

-
- involves an internal organ; or
 - involves second- or third-degree burns, or any burns affecting more than five percent of the body surface.

For **Non-Rail Events or Rail-Mode Non-Serious Injuries** (defined below), if an individual seeks medical care several hours after an event or in the days following an event, that individual is not reportable as an injury.

A reportable injury requires that the individual receive medical attention at a location *other* than the location at which the event occurred. This distinction serves to exclude minor first aid or other minor medical assistance received at the scene. However, as noted above, this criterion does not pertain to **Serious Injuries (rail modes)** (defined below).

- **Serious Injury:** Does not require transport away from the scene of the event. However, requires hospitalization for more than 48 hours within 7 days of the event; results in a fracture of any bone (except simple fractures of fingers, toes, or nose); causes severe hemorrhages, or nerve, muscle, or tendon damage; involves an internal organ; or involves second- or third-degree burns, or any burns affecting more than five percent of the body surface.
- **Non-serious injury:** When person receives immediate medical attention away from the event and does not meet a threshold for serious injury.

When a person receives immediate medical attention away from the event, that individual may seek medical attention through any means of vehicular transport, including transit vehicle, an ambulance, another emergency vehicle, or a private vehicle. However, the injury is not reportable if the person seeks medical attention by foot.

Not all events that result in immediate transport for medical attention are reported on the major event report. One exception is for Other Safety Events, which are events that are NOT collisions, fires, security events, hazardous material spills, acts of God, or derailments. These events include slips, trips, falls, smoke events, fumes, and electric shock. Agencies only report these events when they meet EITHER the fatality, evacuation, or property damage threshold OR result in two or more injured persons. Other Safety Events that result in one person immediately transported from the scene for medical attention but do not trigger any other major reporting thresholds are reported on the Non-Major Summary Report.

Agencies do not report illnesses that require transport away from the scene for medical attention if the illness is unrelated to an S&S event. For example, a passenger suffering a seizure or a heart attack would not count as an injury. However, a transit operator suffering the same condition is included as an injury if the condition results in a collision.

5310 Vehicles

SRA is required to notify their FDOT district office within 24 hours of any accident involving a 5310 funded vehicle in which FDOT is the lien holder. Following information is required:

1. Date of the accident.
2. Confirmation that SRA conducted an accident investigation in accordance with System Management System (SMS).
3. A copy of the accident report.

Near-Miss Reporting

The Senior Resource Association SMS requires proactive reporting of safety hazards or safety concerns on the part of all employees in order to maintain a proactive position on risk.

Employees will serve as Safety Ambassadors by working safely, complying with requirements and serving as an example to others.

Under no circumstance will employees be retaliated against for the act of reporting safety related information.

The Senior Resource Association SMS contains both proactive and reactive means of reporting safety hazards and near-miss events. The information derived from proactive reports can provide significant insights into potential risk(s) and furthermore, allows for the continuous improvement of Senior Resource Association's SMS. While post-event accident/incident investigations reveal information about safety hazards, we cannot rely solely on reactive data to expose risk.

Process and Procedure:

When an employee becomes aware of a hazard or near-miss, they shall submit a report within eight (8) business hours or at end of shift. This can be done by submitting accident/incident reports with "near miss" indicated to supervision/management or place in the safety drop box. Supervision/management is then required to forward to Safety & Training supervisor. Reports may be entered anonymously if desired, where there is no record of who created and submitted the report

When filing anonymous reports, there is limited ability to provide follow-up communication as the reporter is unknown. Additionally, it is difficult to apply necessary risk mitigation strategies if the reporter does provide enough information for follow-on activities. Therefore, it is recommended that reporters utilize the non-anonymous hazard reporting form.

NON-PUNITIVE SAFETY HAZARD & NEAR MISS REPORTING

SENIOR RESOURCE ASSOCIATION is committed to the safest operation possible. Therefore, it is imperative that we have uninhibited reporting of all safety hazards, near miss, concerns and/or suggestions that in any way affect the safety of our operation.

Every employee at SENIOR RESOURCE ASSOCIATION has the responsibility and right to report near miss, safety hazards or perceived hazards, concerns and/or suggestions that may affect the integrity of our operation to their supervisor or to the Safety & Training Department. Senior Resource Association has the responsibility to provide every employee the opportunity to report those hazards and concerns and do so with confidentiality and without fear of reprisal.

The purpose of this program is to ensure all near miss incident (including minor incidents) are reported, recorded and investigated. We gain understanding and insight from an incident's analysis then utilize that knowledge to predict, prevent or mitigate future risk of reoccurrence. This proactive approach will promote an open, learning and just culture in regard to workplace safety.

SENIOR RESOURCE ASSOCIATION will not initiate disciplinary proceedings against an employee who discloses a safety hazard or perceived hazard, safety concern and / or suggestion involving safety.

However, the non-reprisal policy does not apply to defined accidents/incidents, willful violations of law, Senior Resource Association policy, or any event where there was intentional disregard for safety. This also does not apply to any event or condition that involves criminal activity, substance abuse, controlled substances, alcohol or intentional falsification. In such cases, the Senior Resource Association reserves the right to take disciplinary actions as appropriate. The Senior Resource Association also reserves the right to take appropriate action in the event that a report indicates: willful violations of law or Senior Resource Association policy, intentional disregard for safety, or any event or condition that involves criminal activity, substance abuse, controlled substances, alcohol or intentional falsification by an individual other than the reporting individual.

We urge every employee to use this program to help us provide the highest level of safety for our employees and customers. Every employee who submits a report will be provided feedback on the final outcome regarding his/her report.

The identity of the person reporting will be confidential and only known by the Safety Department or reports may be made anonymously if you so desire.

7: SMS Communication

The Senior Resource Association SMS will use a variety of methods to communicate issues important to the operation of the SMS. This strategy will complement existing safety communication channels to make company personnel aware of SMS-related safety issues and their roles and responsibilities related to those issues. Effective communication is an essential requirement to ensure and demonstrate lessons-learned from the SMS as a part of the continuous improvement of the SMS, including:

- Ensuring that all staff are appropriately aware of the SMS
- Conveying SMS lessons/information
- Explaining why SMS related activities are introduced or changed
- Educating personnel on procedure for hazard and near-miss reporting
- Promotion of the company's safety objectives, targets and culture

SMS communications methods vary but will comprise of both internal/external communication.

Internal Communication:

Internal communication may be accomplished using:

- Notice boards
- Postings on the Continuum HR employee web portal
- Regular safety meetings and/or training sessions
- Telephone communications
- E-mail

External Communication:

Senior Resource Association has determined that significant risks identified through the operation of the SMS will not be communicated to the general public unless required by federal, state or local regulations. Information regarding general SMS operation and specific risks identified will be communicated to the appropriate governing body as required only.

SMS site communication will consist of regularly established activities designed to communicate and reinforce SMS policy and related elements to all employees, to include:

- The importance of conformance with SMS policy, processes or procedure
- Individual roles and responsibilities in achieving conformance with SMS Process
- Changing SMS requirements
- SMS performance data
- Key results of internal/external assessments and audits
- Other information needed to support the SMS

Senior Resource Association is responsible for communicating events and safety information to all employees as appropriate utilizing authorized communication processes.

2. SMS Training, Awareness & Competencies

This aspect of the SMS is a requirement for establishing initial competency and for on-going competence building. Additionally, this is a method for demonstration of the SMS and its contribution to safety culture development.

Senior Resource Association will appropriately train employees at each relevant function and level such that they are aware of:

- The SMS Safety Policy
- The SMS Safety Culture Policy
- The importance of conformance with SMS
- Individual roles and responsibilities specific to the SMS
- General hazard reporting requirements of the SMS
- General accident/incident or near-miss reporting and investigation requirements

Senior Resource Association's SMS training takes into account different levels of responsibility and risk to ensure that there is an appropriate awareness among employees and managers as to what their role responsibilities are. In accordance with the above policy objectives, Senior Resource Association will provide SMS training as follows:

- Senior Leaders/Accountable Managers/Senior Managers: Awareness of SMS roles and responsibilities, safety policy, safety culture policy, SMS requirements, related DOT/FTA regulations, management commitment and responsibilities, and safety performance monitoring responsibilities.
- Managers and Supervisors: SMS policy, hazard identification and risk management, safety performance monitoring responsibilities.
- Frontline personnel: SMS Overview, SMS policy, safety culture policy, hazard identification and risk assessment procedure, accident/incident investigation process

Competencies:

Frontline employees and management competence within the SMS operations will be assured through continuous communication and involvement in the SMS as follows:

Employees shall be:

- Involved in the review of hazard and risk assessments and accident/incident investigation findings
- Consulted when there are workplace changes that occur as a result of SMS-related activities
- Informed of significant issues arising from the operation of the SMS at their site; including lessons-learned from hazards, near-miss reports and accident/incident investigation findings.

Managers shall:

- Be involved in the review of hazard and risk assessments, accident/incident investigation findings and department SMS standard operating process development
- Coordinate workplace changes that need to occur as a result of SMS-related activities
- Lead resolution of SMS matters at their department
- Coordinate resolution of significant issues arising from the operation of the SMS at their location, including lessons-learned from hazards, near-miss reports, and implementation of accident/incident investigation findings

3. Information Management

The SMS information management requirements in this chapter pertain to:

- Oversight/updates to the Senior Resource Association SMS
- Oversight/updates to SMS manuals and other related documentation
- Oversight of SMS information generated through the routine monitoring of the SMS and associated operations

Operating an SMS generates a significant amount of data, documents, and reports. Proper management and recordkeeping of such data is crucial for sustaining an effective SMS. Effective safety analysis is wholly dependent upon the availability and competent use of the safety data. Cross-functional safety data integration is a cornerstone of SMS achievement.

All SMS related records are maintained such that they are:

- Legible, identifiable, and traceable to the activity, product, or service involved
- Protected against damage, deterioration, and loss
- Readily retrievable when required for internal review and/or audits from external organizations

4. SMS Assessment

This chapter provides the guidelines for evaluating the implementation, performance monitoring, and continuous improvement of the Senior Resource Association SMS. Assessments focus on the integrity of the organization's SMS, and periodically assesses the overall level of safety and the effectiveness of the safety performance monitoring functions of the SMS. Assessments are intended to measure effectiveness of the site/organization's safety management functions and activities and will ensure that the structure of the SMS is sound regarding oversight, procedural compliance, hazard identification, risk assessment, level of competency, and training.

Specifically, the SMS assessment process will examine:

- Overall effective SMS integration
- Assignment of roles and responsibilities for SMS
- Staff performance and accountability for safety
- Management commitment and employee involvement
- Compliance with SMS hazard/risk assessment process
- Effectiveness of safety performance targets and indicators
- Evidence of SMS continuous improvement
- Adequacy of employee training for SMS roles
- Human and organization factors are addressed

The SMS Assessment Form used by SRA is an attachment to this PTASP.

Record Retention: Copies of all assessment records are maintained on the Senior Resource Association's Transit drive; and the agency safety and training office for a minimum period of 84 months.

5. Emergency Response Planning

Senior Resource Association SMS requires proactive response to transit related incidents and accidents on the part of all employees.

Potential changes to the response plan may be identified by the following methods:

- Review of accidents, incidents, and near-misses
- Risk assessment processes
- Internal evaluation
- External evaluation
- Assessments or audits

6. Security Program Plan

In accordance with Rule 14-90, SRA has adopted, and implemented a Security Program Plan (SPP), which covers the security portion of the SMS. The SPP contains information about prevention, mitigation, preparedness, response, recovery, and associated organizational responsibilities.

The SPP addresses the following hazard and security elements and requirements:

- Security policies, goals, and objectives
- Organization, roles, and responsibilities
- Countermeasures and Strategies
- Procedures for investigation of events described under subsection 14-90.004(5), F.A.C.
- Procedures for SPP maintenance and distribution.

The SPP has been adopted separately from the SMS. Bus transit systems are prohibited by Section 119.071(3) (2), Florida Statutes, from publicly disclosing the SPP, as applicable under any circumstance. The document is maintained in a secure location by the management and access to the document is restricted to select agency personnel and appropriate FDOT personnel exercising oversight in this area. On-site access to the SPP is granted to regulatory authorities (FDOT, FTA, etc.) on as-needed basis. Select portions of the SPP may be shared with employees depending on their job responsibilities. The SPP is an attachment to this PTASP.

7. Operator Selection, Qualification & Training

Senior Resource Association management is responsible for ensuring that the following minimum standards are met when hiring new drivers.

- Must possess a valid Florida driving license of appropriate class.
- Criminal background check Level 2, with pre-employment drug screen and driving records check including, but not limited to, the following items:
 - Driving records
 - Must be 18 years of age
- Complete employment application.
- Valid DOT Physical
- Signed acknowledgement of receipt and agreement to comply with drug-free workplace policy.
- Successful completion of required orientation, training and testing to demonstrate and ensure adequate skills and capabilities to safely operate each type of bus or bus combination before driving on a street or highway unsupervised.
- Signed acknowledgment of receipt and compliance with the following written operational and safety procedures *before* driving on a street or highway unsupervised.
 - Communication and handling of unsafe conditions, security threats, and emergencies.
 - Familiarization and operation of safety and emergency equipment, wheelchair lift equipment, and restraining devices.
 - Application and compliance with all applicable federal and state laws, rules and regulations.
- Drivers are required to write and submit a daily bus inspection report pursuant to Rule 14-90.006, F.A.C.

Noncompliance with any regulatory or agency specific requirement may result in an employee administrative action up to and including suspension or termination of employment. It is the policy of Senior Resource Association to screen applicants to eliminate those that pose a safety or security threat to the agency or who would not be capable of carrying out agency safety and security policies.

Initial Driver Training and Testing

A new-hire check-off list must be completed to ensure the employee has received all required 14-90 training and information before being authorized for over-the-road service.

1. Bus transit system safety and operational policies and procedures.
2. Operational bus and equipment inspections.
3. Bus equipment familiarization.

4. Basic operations and maneuvering.
5. Boarding and alighting passengers.
6. Operation of wheelchair lift and other special equipment.
7. Distracted & Defensive driving.
8. Passenger assistance and securement.
9. Handling of emergencies and security threats.
10. Security and threat awareness.
11. Driving conditions.
12. Accident/Incident Reporting
13. Fire & First Aid
14. Pedestrian Awareness
15. ADA

As part of the driver training program, specific procedures have been incorporated to instruct the driver on how to safely approach and depart from a transit bus stop to avoid contact with pedestrians and other hazards.

After successful completion of each training module, the agency is required to document and record the satisfactory completion of the employee's training. Certificates of completion will be maintained in the driver files for a minimum of seven years.

All newly hired employees are also provided instructional training by the Safety & Training Supervisor per agency's SMS. Drivers are given instruction in Senior Resource Association rules and standard operating procedures in the following areas :

- General rules: General rules of the agency including employee conduct codes
- Personal appearance: uniforms and grooming.
- Customer service: expectations of employees when dealing with the public; includes instruction on how and to whom to report security incidents, and types of individuals or situations to be aware of and report.
- Traffic laws: Covers applicable traffic-related laws and regulations
- Americans with Disabilities Act requirements: Provides instruction in complying with ADA requirements and providing service to disabled patrons.
- Radio procedures: Provides instruction on radio procedure for both routine and emergency radio traffic. Includes instruction on reporting crimes, suspicious acts, and potentially hazardous situations.
- Report writing: Provides instruction on report writing, and reporting requirements.
- Substance abuse policy: An overview of the drug and alcohol testing program.

Occupational Safety and Health Administration (OSHA) standards: Covers blood borne pathogens and other occupational exposure to health hazards.

On-Going/Refresher Training

The Safety & Training Supervisor will develop and maintain a Training Manual for on-going and refresher training and testing of employees. The manual will contain training course content, curriculum, lesson plans, testing requirements, etc. On-going/refresher training and testing sessions will be conducted as necessary to remain compliant with Rule 14-90. The drivers are required to attend training and testing in all areas specified by Rule 14-90 at least once every three years. All training and testing activities are to be recorded and retained in files for a minimum of seven years.

Remedial Training

Senior Resource Association will employ remedial training for drivers who have been involved in a serious collision or have developed unsafe driving behavior or other driving problems. Other causes for remedial training may include persistent customer complaints, supervisor recommendations, or a result of ongoing evaluations. Depending on the circumstances, the Safety & Training Supervisor will determine the appropriate remedial training and testing, the results of which will also be documented and retained in files.

Supervisor Oversight of Driving

The Safety & Training Supervisor and Operations Supervisors will regularly watch the video from each bus to review for safety concerns. Should an infraction be observed, the bus operator will be notified immediately and the appropriate counseling is to take place per the progressive discipline procedure.

8. Records Management

The Transportation Director is responsible for implementing a record management program that includes maintenance, retention, distribution, and safe disposal of all safety and security records of the agency in compliance with state and federal regulations.

All safety and security documents of the agency (SMS and SPP) will be periodically revised, as needed, to ensure that they are up to date. Revisions and updates will be communicated with employees, contractors, and regulatory agencies as they occur or as deemed necessary by the management, depending on the nature of the revision or update. The SPP is considered a confidential document and will be retained in a secure location by management.

Senior Resource Association will maintain and retain the following records:

- Records of bus driver background checks and qualifications
- Detailed descriptions of training administered and completed by each bus driver
- Event investigation reports, corrective action plans, and related supporting documentation
- Records of preventive maintenance, regular maintenance, inspections, lubrication, and repairs performed for each bus
- Completed and signed medical examination reports for each bus driver

In addition, Senior Resource Association will retain records of daily bus inspections and any corrective action documentation for a minimum of seven years.

All sensitive personnel records will be protected from public access. When ready for disposal, both paper and electronic data will be disposed of in a secure manner ensuring that critical information is protected.

9. Drug and Alcohol Program

DRUG-FREE WORKPLACE PROGRAM (DFWP) Substance Abuse Policy for Safety sensitive Employees

BACKGROUND

The Senior Resource Association, Inc. (SRA) adopted this policy in response to the Omnibus Transportation Employee Testing Act of 1991.

The Federal Transit Administration (FTA), published regulations prohibiting drug use and alcohol misuse by transit employees and requiring transit agencies to test for prohibited drug use and alcohol misuse. Federal regulations 49 CFR Part 655, "*Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations*" mandates urine drug testing and breath alcohol testing for all employees in safety-sensitive positions. These regulations prohibit the performance of safety sensitive functions when there is a positive drug or positive alcohol test result. In addition, the U.S. Department (DOT) has issued 49 CFR Part 40, "Procedures for Transportation Workplace Drug and Alcohol Testing Programs" to provide uniform procedures and standards for conducting drug and alcohol testing programs.

The drug and alcohol testing program of SRA will be conducted in accordance with 49 CFR Part 655 and 40, as amended. This program and policy supersedes all prior Drug Free Workplace Program (DFWP) and Policies.

PURPOSE

The intent of this policy is to comply with FTA drug and alcohol testing requirements to ensure fitness for duty, and to protect employees, clients, caregivers, passengers, and the general public from risks associated with the use of alcohol and prohibited drugs. This policy is also intended to comply with and incorporate Federal Regulations 40 CFR Part 29, *The Drug Free Workplace Act of 1988*; the establishment of drug-free workplace policies and reporting certain offenses to the FTA, including employees convicted of criminal drug offenses that occur in the workplace.

This policy applies to all individuals performing a "safety-sensitive function" as defined under this policy. This policy also applies to visitors, vendors, and contractors while on SRA property. In general, adherence and participation in this program is a requirement of each safety-sensitive employee and is a condition of employment. All employees, including safety-sensitive and non-safety sensitive employees are prohibited from possessing, consuming, or reporting to work or working while alcohol and/or substances are present in their bodies. Violation of this policy will result in separation from SRA.

Prospective candidates are informed that SRA is a Drug Free Workplace Policy in its job postings and advertisement.

SAFETY SENSITIVE POSITION

Employees, applicants, volunteers, contractors or sub-contractors who perform or will perform safety sensitive functions are considered “covered employees” and therefore included in the definition.

The following positions are considered Safety Sensitive at SRA:

- Transportation Director
- Transportation Fleet Manager
- Drivers
- Mechanics

SAFETY SENSITIVE FUNCTION

This term includes the following actions:

- Operating a revenue service vehicle including when not in revenue service;
- Controlling the movement of a revenue service vehicle;
- Maintaining (including repairs, overhaul, and rebuilding) a revenue service vehicle or equipment used in revenue service.

Performing such a function includes any period in which a safety-sensitive employee is actually performing, ready to perform or immediately available to perform a safety-sensitive function.

SUBSTANCES – PROHIBITED

In addition to alcohol, the following substances are prohibited and will be tested for:

- Cocaine
- Opiates (heroin, codeine)
- Phencyclidine (PCP)
- Cannabinoids (marijuana)
- Amphetamines

Safety-sensitive employees may be tested for any of the five prohibited drugs listed above any time they are on duty.

SUBSTANCES – LEGAL USE

The appropriate use of legally prescribed drugs and non-prescription medications is not prohibited. An employee or applicant may be prescribed medication from a physician, however, if the use of any substance carrying a warning label indicates that mental functioning, motor skills, or judgment may be impaired, the employee must inform their supervisor and medical advice must be sought before performing any work-related duties. Alternatively, the employee must obtain permission to be relieved of safety-sensitive work until the prescribed medication is no longer needed.

SUBSTANCES – MISUSE OF

The misuse of legally prescribed drugs or the use of illegally obtained prescription drugs is prohibited and considered prohibited conduct and will be dealt with in the same manner as the use of all illegal substances. Misuse also includes using medication that is used by an individual other than the person on the prescription.

ALCOHOL

A socially acceptable substance consumed throughout the world, however, when consumed for physical and mood-altering affects, it is an abused substance which slows down physical functions and progressively impairs mental acuteness. For the purpose of this policy, alcohol is an intoxicating agent found in:

- Beverage alcohol
- Ethyl alcohol
- Low molecular weight alcohol (methyl or isopropyl)
- Any beverage, mixture, or preparation, including medications, containing alcohol

PROHIBITED ACTIVITIES

Covered employees are prohibited from:

- consuming alcohol within 4 hours of performing a safety-sensitive function,
- consuming alcohol while performing a safety-sensitive function,
- consuming alcohol during specified "on-call" hours or while "waiting for work",
- bringing alcohol, drugs or drug paraphernalia on SRA building, vehicle or property,
- bringing alcohol, drugs or drug paraphernalia to a client's home or property,
- possessing alcohol or drugs, being impaired by alcohol or drugs, or displaying conduct that causes "reasonable suspicion",
- possessing in one's body any detectable amount of drugs or alcohol, and
- unlawful manufacturing, distributing, dispensing, possessing, or using alcohol or any form of controlled substances as defined above, during the employee's schedule and/or work day, whether or not on SRA business or property.

Any employer having actual knowledge that a covered employee has consumed alcohol within four hours of performing a safety-sensitive function shall not permit the individual to perform or continue to perform a safety-sensitive function.

COMPLIANCE WITH TESTING REQUIREMENTS

All covered employees are subject to urine drug testing and alcohol testing as a condition of employment.

Such testing may be done for the following:

- prior to employment in a safety-sensitive position
- prior to a transfer from a non-safety sensitive to a safety-sensitive position
- for reasonable suspicion
- immediately following an on-duty, FTA-qualifying accident
- for a return to work following an extended absence related to worker's compensation, light duty, or leave (this is considered to be a pre-employment test)
- randomly
- any other time required by FTA

Procedures used to test for the presence of alcohol or a controlled substance shall be such that they protect the employee, the validity of the testing process, the validity of the test result and that the results are attributed to the correct employee. The testing, handling of tests and confidentiality shall be conducted consistent with the procedure set forth in 49 CFR Part 40, as amended.

PRE-EMPLOYMENT

All covered employees will undergo a drug test prior to employment at SRA. Failure to comply, complete a drug test and produce a verified negative test result will disqualify an

individual from employment at SRA. A covered employee or applicant cannot be hired or perform a safety sensitive function until the individual takes a pre-employment drug test administered in compliance with Sect.655.41(a) and a verified negative result has been received from the MRO.

If a pre-employment drug test is canceled, SRA shall require the covered employee or applicant to take another pre-employment drug test with a verified negative test result.

Pre-employment - Leave of Absence

An employee who returns from an extended leave of 90 consecutive days or more must take and pass a pre-employment drug test prior to resuming or returning to a safety-sensitive function, if they were not in the random testing pool during their leave. Failure to pass a drug test will result in termination and the individual will be referred to a SAP.

Pre-Employment – Employee Transfer

An employee transferring from a non-safety sensitive position may not perform a safety sensitive function until a pre-employment drug test is administered with a verified negative test result.

REASONABLE SUSPICION

The employer's determination that reasonable suspicion exists shall be based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech or body odors of the covered employee, such as:

1. Apparent physical state of impairment
2. Odor of alcohol on breath
3. Incoherent mental state
4. Marked changes in behavior that are otherwise unexplainable
5. Accident or other action that provides reasonable cause to believe the covered employee may be in violation of this policy

SRA supervisor(s) or other company official(s) who is trained in detecting the signs and symptoms of drug use and alcohol misuse must make the required observations. SRA has the right to authorize and train other company officials to make reasonable suspicion observations.

The covered employee will be accompanied by a manager to the testing site. Employees under reasonable suspicion will be placed on suspension with pay and will not return to duty until the test results are issued.

POST ACCIDENT

Following an FTA-qualifying accident as defined in this section, SRA is responsible for ensuring that post- accident alcohol and drug testing is conducted as soon as possible. If an alcohol test is not administered within two hours following the accident, SRA will document the reason(s) the alcohol test was not properly administered and will continue attempts to administer an alcohol test for up to 8 hours following the accident. If an alcohol test required by this section is not administered within 8 hours following the accident, SRA will cease attempts to administer the test and update the two-hour report. The drug test must be administered within 32 hours following the accident.

Accidents resulting in a fatality require a safety sensitive employee to undergo drug and alcohol testing regardless of whether or not the vehicle is in revenue service. Any other employee(s) whose performance may have contributed to the accident will also be tested.

A drug and alcohol test will also be conducted if the accident results in injuries requiring immediate medical treatment away from the accident scene, or if one or more vehicles incur disabling damage that requires towing from the accident site, unless SRA determines that the employee's performance can be completely discounted as a contributing factor to the accident. The decision regarding whether the employee's performance involved in an accident is the sole discretion of SRA using the best information available at that time. Any other employee(s) whose performance may have contributed to the accident will also be tested.

SRA also reserves the right, for insurance purpose, to test a safety-sensitive employee under its own authority, even when the accident does not meet FTA guidelines.

Post-accident testing shall not delay necessary medical treatment.

SRA prohibits alcohol use by any covered employee required to take a post-accident alcohol test under Section 655.44 for a minimum of eight hours following the accident or until the covered employee undergoes a post-accident test, whichever comes first.

In the rare event the employee is unable to submit to a post-accident test within the required timeframe (8 hours for alcohol and 32 hours for drugs) due to circumstances beyond their control, the results of a blood, urine and breath alcohol test conducted by federal, state or local officials having independent authority to test, will be considered to meet the post-accident requirements if the test conforms to applicable federal, state, or local testing requirements and the results are obtained by SRA, as per Section 655.44(a)(2)(ii).

LEAVING THE ACCIDENT

Any safety-sensitive employee, who leaves the scene of an accident without a justifiable reason or explanation prior to the required post-accident test, is considered to have refused a test, and will be immediately removed from their duty and terminated.

RANDOM

A covered employee may be randomly tested for prohibited drug use anytime while on duty. Any drug which (1) is not legally obtained; (2) can be legally obtainable but is not, (3) is used in a manner or for a purpose other than prescribed, or (4) is used by an individual other than the person for whom it is prescribed. Any illegal drug or substance identified in Schedules I through V of Section 202 of the Controlled Substance Act (21 USC 812), and as further defined by 21 CFR 1300.11 through 1300.15.

Covered employees in safety sensitive functions are subject to random, unannounced testing throughout the year. SRA ensures that the selection of employees for random testing is made by a scientifically valid method, such as a random table number or a computer-based random number generator, so that each covered employee shall have an equal chance of being tested each time selections are made. SRA also ensures that the random drug testing is spread out throughout the calendar year, including any day and times a safety sensitive function is being performed.

The covered employee who is notified that they have been selected for random drug and/or alcohol testing must immediately proceed to the test site.

If a manager is in the random selection pool and responsible for generating or receiving the random list, or for notifying employees selected by the random list, the list will act as notification to the manager, if the manager is selected, and the manager will proceed immediately to the test site.

ALCOHOL TESTING

A covered employee shall only be randomly tested for alcohol misuse while the employee is performing safety-sensitive functions; just before the employee is to perform safety-sensitive functions, or just after the employee has ceased performing such functions. No safety-sensitive employee shall report for duty, remain on duty, be on call or stand by for duty when required to perform a safety-sensitive function while having an alcohol concentration of 0.02 or greater.

If an initial test indicates an alcohol concentration of 0.02 or greater, a second test will be performed to confirm the results of the initial test. An employee who has a confirmed alcohol concentration of 0.02 but less than 0.04 will be removed from the safety-sensitive for eight hours or until a retest results in a concentration measure of less than 0.02, whichever is earlier. An alcohol concentration of 0.04 or greater will be considered a positive test and a violation of this policy. The employee will be removed from their safety sensitive duty, terminated and referred to a Substance Abuse Professional (SAP).

TESTING PROCEDURES AND RECORDKEEPING

1. Testing will be conducted in a manner that ensures a high degree of accuracy and reliability; using techniques, equipment and lab facilities which have been approved by the U.S. Department of Health and Human Services (DHHS).
2. Initial alcohol screening tests will be conducted by a National Highway Traffic Safety Administration (NHTSA) approved Evidential Breath Testing Device (EBT) or non-evidential device approved by NHTSA. Confirmatory test for alcohol concentration will be conducted utilizing a NHTSA approved EBT.
3. A trained Breath Alcohol Technician (BAT) shall conduct the alcohol screening test and the results of both screening and confirmation will be displayed to the person being tested immediately following the test(s).
4. Results will be transmitted by the BAT to SRA in a confidential manner (in writing, in person, electronic) and filed appropriately and/or become part of the employee's medical record.
5. A covered employee with a confirmed positive drug or alcohol test will be removed from their safety-sensitive position and terminated from employment. The individual will be informed of educational and rehabilitation programs and referred to a Substance Abuse Professional (SAP).
6. Except as required by law or expressly authorized, SRA shall not release employee information contained in records maintained per 40 CFR section 655.73.
7. An employee is entitled, upon written request, to obtain copies of any records pertaining to the employee's use of alcohol or controlled substances, including any records pertaining to their alcohol or controlled substance tests.
8. SRA shall release or obtain information regarding the employee's records as directed by the specific, written consent of the employee authorizing release of the information to an identified person. Release of such information is permitted only in accordance with the terms of the employee's consent.

9. SRA may disclose information required to be maintained under 49 CFR part 655.73 pertaining to an employee/applicant, a decision maker in a lawsuit, grievance or other proceedings initiated by/on behalf of such individuals, and/or arising from the results of an alcohol and/or controlled substance test administered under this part, or from determination that the employee engaged in conduct prohibited by this policy, including but not limited to a worker's compensation or other proceedings relating to a benefit sought by the employee.
10. SRA shall make available copies of test results conducted under this policy, including the administration of a post-accident alcohol and/or controlled substance test, or other information pertaining to alcohol misuse and/or controlled substance use prevention program, when requested by DOT, FTA or National Transportation Safety Board.

SHY BLADDER

If an employee is unable to produce sufficient urine for testing (shy bladder) he/she will be given up to three hours to produce a sufficient urine specimen for a drug test. During the three-hour period an employee will be given up to 40 ounces of fluid before making a second attempt to provide a complete specimen.

CONSEQUENCES

A covered employee will be immediately removed from their safety sensitive function, terminated from the organization, and referred to the SAP if any of the following occur:

- a verified positive drug test result
- a confirmed alcohol test result with an alcohol concentration of 0.04 or greater
- refusal of a request for testing

REFUSAL TO TEST

The following actions constitute a refusal to test:

- failure to sign the certification at Step 2 of the ATF for alcohol testing
- failure to remain at the test site until the test process is complete
- failure to undergo a medical examination or evaluation as directed by the MRO as part of the verification process
- if the MRO has verified an adulterated or substituted test result
- failure to provide a breath or urine specimen
- failure to provide a sufficient breath or urine sample without a valid medical explanation
- refusal to have the test directly observed or monitored or failure to permit the observation of monitoring of their specimen
- failure to take a second test the employer or the collector has directed
- failure to follow the observer's instructions during an observed collection including instructions to raise clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if there is present any type of prosthetic or other device that could be used to interfere with the collection process
- possess or wear a prosthetic or other device that could be used to interfere with the collection process
- admit to the collector or MRO that you adulterated or substituted the specimen
- verbal declaration of refusal, disruptive or uncooperative behavior, or failure to cooperate with any part of the testing process

CANCELLED OR INVALID TEST

A drug test that has been declared invalid by the MRO or canceled for other reasons will be considered neither positive nor negative. A rejected sample by the lab is treated the same as a canceled test. For alcohol testing, a test that is deemed to be invalid per 40 CFR Part 40.267, will be considered neither negative nor positive. If a pre-employment drug test is canceled, the Designated Employer Representative (DER) will require the applicant to take another pre-employment drug test with a verified negative result before the individual can perform any safety-sensitive function.

SPECIMEN TEMPERATURE OUT OF RANGE

During the urine collection process, the urine specimen will be examined to determine if it has been altered or substituted. Any urine specimen with a temperature outside the range specified in 49 CFR Part 49 will result in a second collection under direct observation.

ADDITIONAL TESTING / SPLIT-SPECIMEN

An employee is entitled to request within 72 hours of learning of a verified positive test result by the MRO, for an additional test of the split specimen, at the employee's expense. A different DHHS-certified lab must be used, and the test will be conducted following 49 CFR Part 40 requirements. If the test result of the split-specimen fails to reconfirm the presence of a substance, the test result will be ruled, "Canceled", and procedures for canceled tests; 49 CFR Part 40.187 will be followed. If the test result confirms "Positive", the test result is ruled positive.

If the employee has not requested a split specimen test within 72 hours, the employee may present reasons why they were unable to make a timely request. The MRO will determine whether the explanation is satisfactory.

Dilute Test

SRA shall, upon receipt of a negative dilute result from the MRO, request the employee/applicant to submit to a second urine collection as outlined in 40 CFR Part 40.197. A verified, positive dilute constitutes the same as a verified positive non-dilute result.

VERIFIED POSITIVE TEST RESULT PROCESS

SRA will notify a covered employee of a random, reasonable suspicion and post-accident test result for controlled substances or alcohol conducted under this part when the test result is verified positive. SRA will inform the employee which substances were verified as positive. Under this policy, verified positive test results will result in removal from safety sensitive duty and termination from the organization. A referral to a DOT Certified Substance Abuse Professional who meets the qualifications outlined in 49 CFR Part 40.281 Subpart O, will be provided to the employee.

TREATMENT

Covered employees who are in violation of this policy will be immediately removed from safety-sensitive duty and their employment will be terminated. Those that test positive are encouraged to make use of the available resources for treatment for alcohol and substance abuse programs. SRA will refer the terminated employee to a SAP who has knowledge of and clinical experience in the diagnosis and treatment for alcohol and controlled substances-related disorders, and who meets the qualifications outlined in 49 CFR Part 40.281 Subpart O.

EMPLOYEE PROTECTIONS

SRA is committed to fair and equitable application of this policy, therefore, managers are to use and apply all aspects of this policy in an unbiased and impartial manner.

1. It is not the responsibility of the manager to determine if substance abuse has or has not occurred. The manager's duty is to determine if there is reasonable suspicion and if the safety-sensitive employee is "fit for duty".
2. If the opinion of the manager is that the employee is considered "unfit for duty," the manager, in coordination with another manager, will determine if the employee should be tested for drugs and/or alcohol. The employee will be sent home by a safe mode of transportation, accompanied, if necessary, by management. Depending on the determination of the observed impairment, the employee may be referred to a facility for an evaluation, and will not be allowed to drive.
3. If an employee suspects another employee is "unfit for duty", they should report their observation or concern to a manager immediately.
4. A supervisor who knowingly disregards the requirements of this policy, or who deliberately misuses the policy shall be subject to disciplinary action, up to and including termination.
5. An employee, who fails to immediately notify a supervisor of any criminal drug statute conviction, a finding of guilt, whether or not adjudication is withheld, or the entry into a diversionary program in lieu of prosecution, shall be subject to immediate removal from safety-sensitive functions and disciplinary action up to and including termination.
6. An employee reporting for work, unfit for duty, as defined above, or is unable to properly perform work duties due to conduct that would violate this policy will, at a minimum, be suspended without pay and may be subject to further disciplinary action up to and including termination.
7. The consequences of a positive drug test include the possible denial of workers' compensation benefits pursuant to the Workers' Compensation Act §440.102, Florida Statutes.

REQUIRED BACKGROUND CHECKS

In compliance with 49 CFR Part 40.25, SRA must make a good faith effort to obtain drug and alcohol test records from prior DOT covered employer(s) for the previous two (2) years for all applicants seeking safety-sensitive positions and all current employees transferring into safety-sensitive positions.

1. Each applicant or transferee is required to provide written consent allowing the release of such information from previous DOT covered employers to SRA.
2. An applicant/transferee who refuse to provide written consent will not be permitted to perform safety-sensitive functions for SRA.
3. Safety-sensitive applicants/transferees who previously failed a DOT pre-employment test must provide proof of successful completion of a Substance Abuse Professional's evaluation and treatment program in addition to their submission to a pre-employment drug test with a negative result prior to their employment into a safety-sensitive function. Credentials,

training and education of the Substance Abuse Professional must meet or exceed 40 CFR Part 40, Subpart O.

MEDICAL REVIEW OFFICER (MRO)

The designated MRO shall be a licensed physician with knowledge of drug disorders.

SRA uses the following MRO:

Dr. Natalie Hartenbaum

c/o First Lab

1364 Welsh Road, Suite C-2

North Wales, PA 19454 - 1913

Phone: 800-732-3784

Fax: 215-641-4959

www.firstlab.com

DOT Acct # 09545680

FL DFWP Acct # 37198025

The role of the MRO is to review, interpret and confirm test results, and examine alternate medical explanation for positive test results by conducting further medical interviews and review of the individual's medical history or other relevant factors. The MRO shall review all medical records made available by the tested individual when a confirmed positive test could have resulted from a legally prescribed medication. The MRO shall not consider results of urine samples that are not obtained or processed in accordance to DOT regulations.

The MRO shall report to a designee of SRA using any written communication reporting device on test results, two (2) business days following the completion of a test.

The report will contain:

- Full name of the employee tested, as indicated on the Custody & Control Form
- Specimen ID from the CCF; donor SSN, or employee ID number
- Date of collection
- Date MRO received copy of the CCF
- Result of test; date test was verified

An employee shall be notified by the MRO of a laboratory confirmed positive test and a verification interview will be conducted with the employee by the MRO, in accordance with 49 CFR Parts 40.131, through 40.141.

Random Program Compliance

- First Lab will send a monthly/quarterly reminder when an update of the client employee list is due.
- SRA will monitor testing numbers throughout the year and make adjustments as needed to each selection period to keep on track.
- An alternative report option will be provided for the selection of alternates if there is an employee selected who is not available for testing in the selection period.
- A Compliance Report will be generated so that the compliance status can be reviewed at any time.
- An analysis will be completed before the last selection for the year to make sure that enough employees have been selected to ensure compliance for the year.

TRAINING

To comply, the Senior Resource Association will provide training stated below, as required

- Supervisors who make reasonable suspicion determinations shall receive at least 60 minutes of training on the physical, behavioral and performance indicators of probable drug use and 60 minutes on the performance indicators of probable alcohol use.

- Safety-sensitive employees shall be provided a minimum of 120 minutes/2 hours of orientation and training on this policy and its implementation and on the adverse effects of drug and alcohol abuse on personal health, safety, and the work environment.

Any questions regarding this policy or any aspect of this policy or program should contact their supervisor or Human Resources.

RECORD RETENTION AND RELEASE OF INFORMATION

All dated records and notifications identified by individual will be maintained by the MRO for a minimum of:

- five (5) years for verified positive controlled substance test results
- one (1) year for negative controlled substance test results

No person may obtain the individual controlled substance test results retained by SRA or the MRO, and SRA and the MRO shall not release the individual controlled substance test results of any employee to any person

SRA will maintain records and notifications, as per FTA guidelines:

- by individual for a minimum of five (5) years for verified positive controlled substance test results
- all dated records for a minimum of one (1) year for verified negative controlled substance test results and any canceled tests
- by individual for a minimum of five (5) years for verified positive alcohol test results
- all dated records for a minimum of one (1) year for verified negative alcohol test results
- all dated records pertaining to the collection process for two (2) years
- all copies of annual MIS reports submitted to FTA for a minimum of five (5) years
- employee training records for a minimum of two (2) years
- records obtained from previous employer for new hires for a minimum of three (3) years from the date of the employee's first performance of safety-sensitive duties

No one may obtain the individual alcohol test results retained by SRA or the MRO, and SRA and the MRO shall not release the individual alcohol test results of any employee to any person

PROGRAM CONTACTS

Any questions regarding this policy or other aspect of the drug-free/alcohol-free substance abuse program, should contact:

Chief Personnel officer
4385 43rd avenue
Vero Beach, FL 32967
Ph.: 772-569-0760 ext. 109
Fax: 772-778-7272

10. Vehicle and Facilities Maintenance Program

The function of the maintenance plan is to provide a consistent systematic program to properly maintain and service vehicles to meet or exceed the manufacturer's recommended maintenance schedule. Senior Resource Association vehicle maintenance program will ensure that all buses operated, and all parts and accessories on such buses, including those specified in Rule 14-90.007, F.A.C., and any additional parts and accessories which may affect safety of operation, including frame and frame assemblies, suspension systems, axles and attaching parts, wheels and rims, and steering systems, are regularly and systematically inspected, maintained, and lubricated to standards that meet or exceed the bus manufacturer's recommendations and requirements. The Maintenance Supervisor is responsible for ensuring that a Maintenance Plan consistent with 14-90 has been developed and implemented by the agency and that all vehicles operated are regularly and systematically inspected, maintained, and lubricated according to the agency's Maintenance Plan. The vehicle and facilities maintenance plans are included in the Appendix of this PTASP.

Daily Vehicle Inspections (DVI)

Drivers are required to perform daily vehicle inspections prior to operating the assigned vehicle, during routes, and after all route schedules are completed. The pre/post-trip inspection includes an inspection of the following parts and devices to ascertain that they are in safe condition and in good working order:

- Service brakes
- Parking brakes
- Tires and wheels
- Steering
- Horn
- Lighting devices
- Windshield wipers
- Rear vision mirrors
- Passenger doors
- Exhaust system
- Equipment for transporting wheelchairs
- Safety, security, and emergency equipment

During the scheduled trips and at the end of the day, the operator will note any additional findings and submit the daily vehicle inspection forms. The process and form/s to be utilized for daily vehicle inspections is included in agency's preventative maintenance guidelines. The daily vehicle inspection forms must be complete with the operator's signature and a check in each box to document that the items are "OK" or X in each box for defects and is noted in the comments section. If the driver finds any mechanical or other problems that could compromise the safety of the vehicle at any point, the drivers will immediately inform their Supervisor and the vehicle will not be scheduled for service until repaired. Failure to report deficiencies by drivers may result in an administrative action taken against the employee.

Daily inspection records will be retained for a minimum of seven years. The Maintenance Supervisor will periodically conduct vehicle inspections behind the drivers who have completed the vehicle inspections to ensure that the daily vehicle inspections are adequately performed. Once defects are noted they will be prioritized and sorted into categories for repairs. Once a defect is noted on the inspection form and repaired, the documentation will be attached to the work/repair order and filed in the maintenance files.

Preventive Maintenance

Senior Resource Association will perform scheduled preventive maintenance on all vehicles at the 6,000 mile interval specified in the agency's maintenance plan. As preventative maintenance inspections are scheduled by projected mileage, the agency will allow ± 600 mile deviations in mileage interval. When a vehicle is due for an inspection, it will be taken out of service until the inspection is completed. This allows a series of repairs to be carried out while minimizing costs and optimizing the number of operational vehicles. If a vehicle is "down" for an extended period of time due to unavoidable circumstances, preventative maintenance will be temporarily suspended until the vehicle can be returned to service. However, the annual inspection will be conducted on all vehicles regardless of "up/down" status and/or mileage accrued. There will be a monthly audit of the Maintenance department's work by the Transportation Director to ensure maintenance is adhering to FDOT inspection standards.

Each vehicle will have a written record documenting preventive maintenance, regular maintenance, inspections, lubrication and repairs performed. Such records will be maintained for at least seven years and include, at a minimum, the following information:

- Identification of the bus
- Date, mileage, description, type of inspection, maintenance, lubrication, or repair performed

For tracking purposes, a maintenance log will be kept containing vehicle ID, make and type of vehicle, year, model, special equipment, inspections, maintenance and lubrication intervals, and date or mileage when services are due.

11. Operating and Driving Requirements

The Chief Safety Officer is responsible for overall compliance with all operating and driving requirements of the SMS.

It is the responsibility of every Senior Resource Association employee who performs driving and/or operational duties to strictly adhere to the following requirements:

- Under no circumstances is a driver allowed to operate a vehicle without having the appropriate and valid driver's license in his or her possession.
- Drivers are not permitted to drive a bus when his or her driver license has been suspended, cancelled, or revoked. A driver who receives a notice that his or her license to operate a motor vehicle has been suspended, cancelled, or revoked is required to notify his or her supervisor of the contents of the notice immediately, if possible, otherwise no later than the end of the business day following the day he or she received the notice. Violation of this policy may result in disciplinary actions including suspension or termination of employment.
- Senior Resource Association management will annually check Motor Vehicle Records (MVR) for all drivers for investigating information on license suspensions, revocations, accidents, traffic violations, unpaid summons, etc. Senior Resource Association management will also check driver license status of each driver utilizing the Florida Department of Highway Safety and Motor Vehicles website - <https://www6.hsmv.state.fl.us/DLCheck/main.jsp>.
- Buses must be operated at all times in compliance with applicable traffic regulations, ordinances, and laws of the jurisdiction in which they are being operated.
- Rule 14-90 defines “On Duty” and “Off Duty” status of drivers as follows -
 - “On Duty” means the status of the driver from the time he or she begins work, or is required to be in readiness to work, until the time the driver is relieved from work and all responsibility for performing work. “On Duty” includes all time spent by the driver as follows:
 - (a) Waiting to be dispatched at bus transit system terminals, facilities, or other private or public property, unless the driver has been completely relieved from duty by the bus transit system.
 - (b) Inspecting, servicing, or conditioning any vehicle.
 - (c) Driving.
 - (d) Remaining in readiness to operate a vehicle (stand-by).
 - (e) Repairing, obtaining assistance, or remaining in attendance in or about a disabled vehicle.
 - “Off-Duty” means any time the driver is not on duty, required to be in readiness to work, or under any responsibility to perform work. Such time shall not be counted towards the maximum allowed on-duty hours within a 24-hour period.

- Drivers are not permitted to drive more than 12 hours in a 24-hour period, or drive after having been on duty for 16 hours in a 24-hour period. A driver is not permitted to drive until the requirement of a minimum eight consecutive hours of off-duty time has been fulfilled. A driver's work period begins from the time he or she first reports for duty to his or her employer. A driver is permitted to exceed his or her regulated hours in order to reach a regularly established relief or dispatch point, provided the additional driving time does not exceed one hour. The Hours Worked Policy is an attachment to this PTASP.
- Drivers are not permitted to be on duty more than 72 hours in any period of seven consecutive days; however, any 24 consecutive hours of off duty time shall constitute the end of any such period of seven consecutive days. A driver who has reached the maximum 72 hours of on duty time during the seven consecutive days is required to have a minimum of 24 consecutive hours of off duty time prior to returning to on duty status.
- A driver is permitted to drive for more than the regulated hours for the safety and protection of the public when conditions such as adverse weather, disaster, security threat, a road or traffic condition, medical emergency, or an accident occur.
- Drivers are not permitted to drive a bus when his or her ability is impaired, or likely to be impaired, by fatigue, illness, or other causes, likely to create an unsafe condition.
- Drivers will not report for duty or operate any vehicle while under the influence of alcohol or any other substance, legal or illegal, that may impair driving ability. All employees are required to comply with agency's Substance Abuse Policy.
- Drivers are required to conduct daily vehicle inspections and reporting of all defects and deficiencies likely to affect safe operation or cause mechanical malfunctions.
- Drivers are required to immediately report any defect or deficiency that may affect safe operations or cause mechanical malfunctions. Any defect or deficiency found shall be properly documented on a Daily Vehicle Inspection (DVI) form and should be submitted to their Supervisor.
- A bus with any passenger doors in the open position will not be operated with passengers aboard. The doors will not be opened until the bus is stopped. A bus with any inoperable passenger door will not be operated with passengers aboard, except to move a bus to a safe location.
- Drivers will ensure that during darkness, interior lighting and lighting in stepwells on buses shall be sufficient for passengers to enter and exit safely. Adherence to pre-trip inspection requirements help insure the ability of this requirement to be met.
- Passengers will not be permitted in the stepwells of any bus while the bus is in motion, or to occupy an area forward of the standee line.
- Passengers will not be permitted to stand on buses not designed and constructed for that purpose.
- Drivers are required to be properly secured to the driver's seat with a restraining belt at all times while the bus is in motion.
- Buses will not be left unattended in an unsafe condition with passengers aboard at any time.

- Drivers are prohibited from leaving keys in the vehicle for any reason at any time the bus is left unattended.
- Transit vehicles will not be used at any time for uses other than those that are authorized and permitted according to state and federal program requirements.

Noncompliance with these requirements may result in disciplinary actions including suspension or termination of employment.

Medical Examinations Requirements

This section of the SMS establishes Senior Resource Association's medical examination requirements for all applicants for driver positions and for existing drivers.

- Medical examination at least once every two years for existing drivers, and a return to duty examination for any driver prior to returning to duty after having been off duty for 30 or more days due to an illness, medical condition, or injury.
- Medical examinations will be performed and recorded according to Medical Examination Form MSCA 5876 or Form Number 725-030-011
- Medical examinations will be performed by a Doctor of Medicine or Osteopathy, Physician Assistant, or Advanced Registered Nurse Practitioner licensed or certified by the State of Florida. If medical examinations are performed by a Physician Assistant or Advanced Registered Nurse Practitioner, they must be performed under the supervision or review of a Doctor of Medicine or Osteopathy.
- An ophthalmologist or optometrist licensed by the State of Florida may perform as much of the medical examination as it pertains to visual acuity, field of vision, and color recognition.
- Upon completion of the medical examination, the examiner shall complete, sign, and date the medical examination form and maintain the original at his or her office.
- Upon completion of the medical examination, the examiner shall complete, sign, and date the medical examination certificate and provide a copy to Senior Resource Association.
- Upon completion of the medical examination the driver shall provide their driver license number, signature, and date on the medical examination certificate.
- Completed and signed medical examination certificate for each bus driver, dated within the past 24 months, will be maintained on file for a minimum of seven years from the date of the examination.
- Senior Resource Association will not allow a driver to operate a transit bus without having on file a completed medical examination certificate dated within the past 24 months.

Wireless Communication

Policy

In compliance with Rule 14-90, (FL 14-90) Florida Administrative Code; Florida Public Transportation Authority (FPTA); *Equipment and Operational Safety Standards for Bus Transit Systems*, all SRA employees (drivers) are prohibited from using personal electronic communication devices while driving or operating a leased or owned SRA vehicle. In conjunction with the organizations (SRA) Policy on Appropriate Use of Equipment, further elaboration on the proper use of electronic devices is below.

Transportation Employees

Electronic communication devices or electrical devices issued by SRA and/or installed in SRA vehicles, leased or owned, are provided for the safety and efficient operation of our Transit and Para Transit system, and is to be used solely for business related purposes. Social conversation and conversations unrelated to the transportation function is prohibited.

Personal electronic devices and personal wireless communication devices as outlined in FL 14-90, is not to interfere with, nor distract an operator from their safety related duties. **The use of these devices are prohibited while the transit vehicle is in motion and as a requirement of FL 14-90, must be turned off with any ear piece(s) removed from the operator's ear while occupying the driver's seat.**

Emergency Situation

SRA Transportation trains and communicates to all Transportation employees (Transportation Driver) the procedure to follow in the event of an emergency situation, including instructions for using personal electronic communication devices (the operator or by-stander) if SRA electronic devices no longer operative.

Definitions (Extracted from FL 14-90):

Bus Transit System - a community transportation coordinator; a public transit provider; or a private contract transit provider which owns, operates, leases, or controls buses; or a privately owned or operated transit provider that receives operational or capital funding from the Department and owns, operates, leases, or controls buses, other than nonpublic sector buses, defined in Section 316.003, F.S., that provides provide transportation services available for use by the general riding public.

Community Transportation Coordinator - a provider of transportation services or an entity that ensures such services are provided by another bus transit system.

Drive or Operate - terms which include all time spent at the controls of a bus in operation.

Driver - any person trained and designated to drive a bus on a street or highway which is being used for the public transport of persons for compensation.

On-Duty - the status of the driver from the time he or she begins work, or is required to be in readiness to work, until the time the driver is relieved from work and all responsibility for performing work. "On-Duty" includes all time spent by the driver as follows:

- (a) Waiting to be dispatched at bus transit system terminals, facilities, or other private or public property, unless the driver has been completely relieved from duty by the bus transit system.
- (b) Inspecting, servicing, or conditioning any vehicle.
- (c) Driving.
- (d) Remaining in readiness to operate a vehicle (stand-by).
- (e) Repairing, obtaining assistance, or remaining in attendance in or about a disabled vehicle.

Unsafe Condition - anything or circumstance which endangers human life or property.

Personal electronic or electrical device - an electronic or electrical device that was not provided by the bus transit system and its use is for business purposes.

Use of a wireless communication device - use of a mobile telephone or other electronic or electrical device, hands-on or hands-free, to conduct an oral communication; to place or receive a telephone call; to send or read electronic mail or a text message; to play a game; to navigate the Internet; to play, view, or listen to a video; to play, view, or listen to a television broadcast; to play or listen to music; to execute a computational function, or to perform any other function that is not necessary for the health or safety of the person and that entails the risk of distracting the employee from a safety-critical task. The use of an electronic or electrical device that enhances the individual's physical ability to perform, such as a hearing aid, is not included in this definition.

Wireless communication device - an electronic or electrical device capable of remote communication. Examples include cell phones, personal digital assistants (PDAs) and portable computers (commonly called laptop computers).

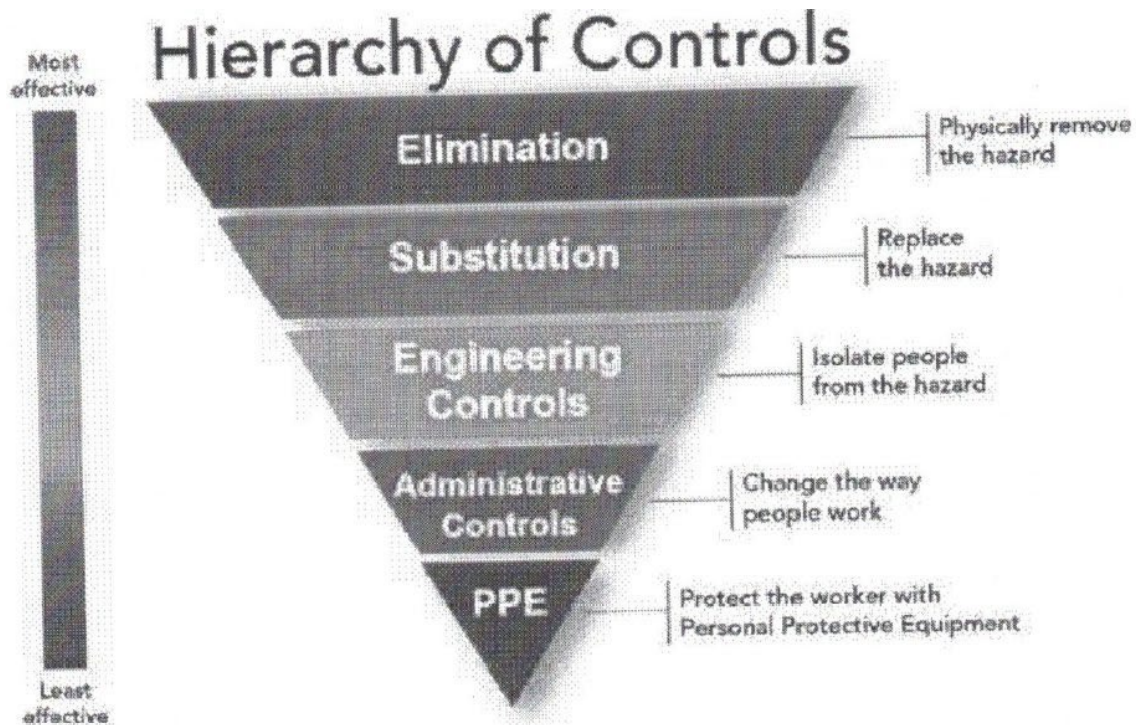
Transit Agency Infectious Diseases Plan

How You Can Protect Your Staff and Others and Slow the Spread:

- Evaluate your workplace to identify locations where workers cannot maintain social distancing of at least 6 feet from each other and/or customers. Use appropriate combinations of controls following the hierarchy of controls below to address these situations to limit the spread of the virus that causes COVID-19.

Hierarchy of Controls

Controlling exposures to occupational hazards is the fundamental method of protecting workers. Traditionally, a hierarchy of controls has been used as a means of determining how to implement feasible and effective control solutions. One representation of this hierarchy is as follows:



The idea behind this hierarchy is that the control methods at the top of graphic are potentially more effective and protective than those at the bottom. Following this hierarchy normally leads to the implementation of inherently safer systems, where the risk of illness or injury has been substantially reduced.

Elimination and Substitution

Elimination and substitution, while most effective at reducing hazards, also tend to be the most difficult to implement in an existing process. If the process is still at the design or development stage, elimination and substitution of hazards may be inexpensive and simple to implement.

Engineering Controls

Administrative and personal protective equipment (PPE) for Engineering Controls are favored because they are designed to remove the controlling existing worker exposures. Well-designed engineering controls can be highly effective in protecting workers. The initial cost of engineering controls can be higher than the cost of administrative controls or P E, but over the longer term, operating costs are frequently lower, and in some instances, can provide a cost savings.

Administrative Controls and PPE

Administrative controls and PPE are frequently used with existing processes where hazards are not particularly well controlled. Administrative controls and PPE programs may be relatively inexpensive to establish but, over the long term, can be very costly to sustain. These methods for protecting workers have also proven to be less effective than other measures, requiring significant effort by the affected workers.

While protecting workers, it is important to note that control recommendations or interventions to reduce risk of spreading COVID-19 must be compatible with any safety programs and personal protective equipment (PPE). At SRA, our approach includes:

COVID-19 Workplace Health and Safety Plan

- Develop plans to communicate with passengers entering the bus regarding modifications to work or service processes
- Notify all workers that any COVID-19 concerns should be directed to their supervisor
- Implement flexible sick leave and supportive policies and practices
- Develop policies that encourage sick employees to stay at home without fear of reprisals, and ensure employees are aware of these policies
- If contractors are employed in the workplace, develop plans to communicate with the contracting company regarding modifications to work processes

Take Action if an employee is suspected or confirmed to have COVID-19

- Immediately separate employees who report with or develop symptoms at work from other employees. These employees should self isolate and contact their health care provider immediately
- Close off and sanitize any areas used for prolonged periods of time by the sick person
- Employees who test positive for COVID-19 should immediately notify their employer of their results
- Sick employees should follow CDC recommended steps to self-isolate or seek c
- Employees should not return to work until they meet the criteria to discontinue home isolation

12. Vehicle Equipment Standards & Procurement Criteria

Senior Resource Association will procure vehicles utilizing the Transit Research-Inspection-Procurement Services (TRIPS) program, formerly known as the Florida Vehicle Procurement Program (FVPP), and other State Programs strictly adhering to the vehicle equipment standards and procurement criteria specified in 14-90.007.

- All buses procured and operated must meet the following minimum standards, as applicable:
 - a. The capability and strength to carry the maximum allowed load and not exceed the manufacturer's gross vehicle weight rating (GVWR), gross axle weighting, or tire rating.
 - b. Structural integrity that mitigates or minimizes the adverse effects of collisions.
 - c. Federal Motor Vehicle Safety Standards (FMVSS), 49 C.F.R. Part 571, Sections 102, 103, 104, 105, 108, 207, 209, 210, 217, 302, 403, and 404, October 1, 2008, hereby incorporated by reference.
- Proof of strength and structural integrity tests on new buses procured will be submitted by manufacturers or bus transit systems to the Department.
- In addition, every bus operated by the agency will be equipped as follows:
 - Mirrors. There shall be two exterior rear vision mirrors, one at each side. The mirrors shall be firmly attached to the outside of the bus and so located as to reflect to the driver a view of the highway to the rear along both sides of the vehicle. Each exterior rear vision mirror, on Type I buses shall have a minimum reflective surface of 50 square inches. Neither the mirror nor the mounting shall protrude farther than the widest part of the vehicle body except to the extent necessary to produce a field of view meeting or exceeding the requirements of this section. All Type I buses shall, in addition to the above requirements, be equipped with an inside rear vision mirror capable of giving the driver a clear view of seated and standing passengers. Buses having a passenger exit door that is located inconveniently for the driver's visual control shall be equipped with additional interior mirrors to enable the driver to view the passenger exit door. In lieu of interior mirrors, trailer buses and articulated buses may be equipped with closed circuit video systems or adult monitors in voice control with the driver.
 - Wiring and Batteries. Electrical wiring shall be maintained so as not to come in contact with moving parts, heated surfaces, or be subject to chafing or abrasion which may cause insulation to become worn. Every Type I bus manufactured on or after February 7, 1988, shall be equipped with a storage battery electrical power main disconnect switch. The disconnect switch shall be practicably located in an accessible location adjacent to or near to the battery and be legibly and permanently marked for identification. Every storage battery on a public-sector bus shall be mounted with proper detainment devices in a compartment which provides adequate ventilation and drainage.

- Brake Interlock Systems. All Type I buses having a rear exit door shall be equipped with a rear exit door/brake interlock that automatically applies the brake upon driver activation of the rear exit door to the open position. Brake interlock application shall remain activated until deactivated by the driver and the rear exit door returns to the closed position. The rear exit door brake interlock on such buses shall be equipped with an identified override switch enabling emergency release of the brake interlock function. The override switch shall not be located within reach of the seated driver. Air pressure application to the brake during brake interlock operation, on buses equipped with rear exit door/brake interlock, shall be regulated at the equipment's original manufacturer's specifications.
- Standee Line and Warning. Every bus designed and constructed to allow standees shall be plainly marked with a line of contrasting color at least two inches wide, or be equipped with some other means to indicate that all passengers are prohibited from occupying a space forward of a perpendicular plane drawn through the rear of the driver's seat and perpendicular to the longitudinal axis of the bus. A sign shall be posted at or near the front of the bus stating that it is a violation for a bus to be operated with passengers occupying an area forward of the line.
- Flooring, Steps, and Thresholds. Flooring, steps, and thresholds on all buses shall have slip resistant surfaces without protruding or sharp edges, lips, or overhangs, in order to prevent tripping hazards. All step edges and thresholds shall have a band of color(s) running the full width of the step or edge which contrasts with the step tread and riser, either light-on-dark or dark-on-light.
- Doors. Power activated doors on all buses shall be equipped with a manual device designed to release door closing pressure.
- Emergency Exits. All buses shall have an emergency exit door, or in lieu thereof, shall be provided with emergency escape push-out windows. Each emergency escape window shall be in the form of a parallelogram with dimensions not less than 18" by 24", and each shall contain an area of not less than 432 square inches. There shall be a sufficient number of push-out or kick-out windows in each vehicle to provide a total escape area equivalent to 67 square inches per seat, including the driver's seat. No less than 40% of the total escape area shall be on one side of the vehicle. Emergency escape kick-out or push-out windows and emergency exit doors shall be conspicuously marked with a sign or light and shall always be kept in good working order so that they may be readily opened in an emergency. All such windows and doors shall not be obstructed either inside or outside so as to hinder escape. Buses equipped with an auxiliary door for emergency exit shall be equipped with an audible alarm and light indicating to the driver when a door is ajar or opened while the engine is running. Supplemental security locks operable by a key are prohibited on emergency exit doors unless these security locks are equipped and connected with an ignition interlock system or an audio visual alarm located in the driver's compartment. Any supplemental security lock system used on emergency exits shall be kept unlocked whenever a bus is in operation.

- Tires and Wheels. Tires shall be properly inflated in accordance with manufacturer's recommendations.
 - i. No bus shall be operated with a tread groove pattern depth:
 - 1. Less than $\frac{4}{32}$ ($\frac{1}{8}$) of an inch, measured at any point on a major tread groove for tires on the steering axle of all buses. The measurements shall not be made where tie bars, humps, or fillets are located.
 - 2. Less than $\frac{2}{32}$ ($\frac{1}{16}$) of an inch, measured at any point on a major tread groove for all other tires of all buses. The measurements shall not be made where tie bars, humps, or fillets are located.
 - ii. No bus shall be operated with recapped, re-grooved, or retreaded tires on the steering axle.
 - iii. Wheels shall be visibly free from cracks and distortions and shall not have missing, cracked, or broken mounting lugs.
- Suspension. The suspension system of all buses, including springs, air bags, and all other suspension parts, shall be free from cracks, leaks, or any other defect which may cause its impairment or failure to function properly.
- Steering and Front Axle. The steering system of all buses shall have no indication of leaks which would or may cause its impairment to function properly, and shall be free from cracks and excessive wear of components that may cause excessive free play or loose motion in the steering system or above normal effort in steering control.
- Seat Belts. Every bus shall be equipped with an adjustable driver's restraining belt in compliance with the requirements of FMVSS 209, "Seat Belt Assemblies" 49 C.F.R. 571.209 – October 1, 2008, and FMVSS 210, "Seat Belt Assembly Anchorages" 49 C. F. R. 571.210 October 1,2008, hereby incorporated by reference.
- Safety Equipment. Every bus shall be equipped with one fully charged dry chemical or carbon dioxide fire extinguisher, having at least a 1A:BC rating and bearing the label of Underwriter's Laboratory, Inc. The fire extinguishers shall be maintained as follows:
 - i. Each fire extinguisher shall be securely mounted on the bus in a conspicuous place or a clearly marked compartment and be readily accessible.
 - ii. Each fire extinguisher shall be maintained in efficient operating condition and equipped with some means of determining if it is fully charged.
 - iii. Every Type I bus shall be equipped with portable red reflector warning devices in compliance with Section 316.300, Florida Statutes.
- Persons with Disabilities. Buses used for the purpose of transporting individuals with disabilities shall meet the requirements set forth in 49 C.F.R. Part 38, October 1, 2008, hereby incorporated by reference, as well as the following:
 - i. Installation of a wheelchair lift or ramp shall not cause the manufacturer's GVWR, gross axle weight rating, or tire rating to be exceeded.

- ii. Except in locations within 3 1/2 inches of the bus floor, all readily accessible exposed edges or other hazardous protrusions of parts of wheelchair lift assemblies or ramps that are located in the passenger compartment shall be padded with energy absorbing material to mitigate injury in normal use and in case of a collision. This requirement shall also apply to parts of the bus associated with the operation of the lift or ramp.
- iii. The controls for operating the lift shall be at a location where the bus driver or lift attendant has a full view, unobstructed by passengers, of the lift platform, its entrance and exit, and the wheelchair passenger, either directly or with partial assistance of mirrors. Lifts located entirely to the rear of the driver's seat shall not be operable from the driver's seat, but shall have an override control at the driver's position that can be activated to prevent the lift from being operated by the other controls (except for emergency manual operation upon power failure).
- iv. The installation of the wheelchair lift or ramp and its controls and the method of attachment in the bus body or chassis shall not diminish the structural integrity of the bus nor cause a hazardous imbalance of the bus. No part of the assembly, when installed and stowed, shall extend laterally beyond the normal side contour of the bus or vertically beyond the lowest part of the rim of the wheel closest to the lift.
- v. Each wheelchair lift or ramp assembly shall be legibly and permanently marked by the manufacturer or installer with the following information:
 - 1. The manufacturer's name and address.
 - 2. The month and year of manufacture.
 - 3. A certificate that the wheelchair lift or ramp securement devices, and their installation, conform to State of Florida requirements applicable to accessible buses.
- Wheelchairs. Wheelchair lifts, ramps, securement devices, and restraints shall be inspected and maintained as required by this rule chapter. Instructions for normal and emergency operation of the lift or ramp shall be carried or displayed in every bus.

13. Assessing, mitigating and monitoring risks related to assaults on transit workers

Assault on a transit worker means, as defined under 49 U.S.C. 5302, a circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker.

SRA must use the Safety Risk Management process documented on pages 16 and 17 in this Agency Safety Plan, as defined at 49 CFR 673.25(c), to conduct the required risk assessment every year.

SRA will use tools, such as the safety risk matrix on pages 16 and 17 in this Agency Safety Plan to facilitate risk-based prioritization. This approach combines the assessed likelihood and severity of a hazard's potential consequences into one visual, which can help decision-makers understand when actions are necessary to reduce or mitigate safety risk. The results shall be reported to the NTD annually.

Appendix

- A. Accident/Incident Report Form
- B. Vehicle Maintenance Plan
- C. Facilities Maintenance Plan
- D. Hours Worked Policy
- E. Pre/Post Trip Forms
- F. SPP (if being given to applicable personnel)
- G. SMS Self-Assessment Review

SENIOR RESOURCE ASSOCIATION SAFETY MANAGEMENT SYSTEM SELF-INSPECTION

Component 1 – Safety Policy and Objectives

Element 1.1 – Management Commitment and Responsibility

No.	Aspect to be analyzed or question to be answered	Answer	Status of implementation	implementation Target Date	Reference Document	Action Required
1.1-1	Is there a safety policy in place?	YES				
		NO				
		PARTIALLY				
1.1-2	Does the safety policy reflect management's commitment of safety management?	YES				
		NO				
		PARTIALLY				
1.1-3	Is the safety policy appropriate to the size, nature and complexity of the organization?	YES				
		NO				
		PARTIALLY				
1.1-4	Is the safety policy relevant to Transit safety?	YES				
		NO				
		PARTIALLY				
1.1-5	Has the safety policy been signed by the accountable executive?	YES				
		NO				
		PARTIALLY				
1.1-6	Has the safety policy been communicated, with visible endorsement, throughout the organization?	YES				
		NO				
		PARTIALLY				
1.1-7	Is the safety policy being periodically reviewed to ensure that it remains relevant and appropriate to the organization?	YES				
		NO				
		PARTIALLY				

No.	Aspect to be analyzed or question to be answered	Answer	Status of implementation	implementation Target Date	Reference Document	Action Required
Element 1.2 – Safety Accountabilities						
1.2-1	Has Senior Resource Association identified an accountable executive, irrespective of other functions, who shall have ultimate responsibility and accountability for the implementation and maintenance of SMS?	YES NO PARTIALLY				
1.2-2	Does the accountable executive have full control of the financial and human resources?	YES NO PARTIALLY				
1.2-3	Does the accountable executive have final authority over all activities of his organization?	YES NO PARTIALLY				
1.2-4	Has Senior Resource Association identified and documented safety accountabilities of management as well as operational personnel, with respect to the SMS?	YES NO PARTIALLY NO PARTIALLY 				

No.	Aspect to be analyzed or question to be answered	Answer	Status of implementation	Implementation Target Date	Reference Document	Action Required
1.3 Appointment of Key Safety Personnel						
1.3-1	Has Senior Resource Association appointed qualified person to manage and oversee the day-to-day operations of SMS?	YES				
		NO				
		PARTIALLY				
1.3-2	Does the qualified person have a direct access or reporting to the accountable executive concerning the implementation and operation of SMS?	YES				
		NO				
		PARTIALLY				
1.3-3	Is the SMS manager's position as senior management not lower or subservient to other operational or production positions?	YES				
		NO				
		PARTIALLY				
1.4 Coordination of Emergency Response Planning						
1.4-1	Does Senior Resource Association have an emergency response/contingency plan?	YES				
		NO				
		PARTIALLY				
1.4-2	Does the emergency/contingency plan address all possible or likely emergencies/crisis scenarios?	YES				
		NO				
		PARTIALLY				
1.4-3	Does the ERP address the necessary coordination of its emergency response/contingency procedures?	YES				
		NO				
		PARTIALLY				
1.4-4	Is there a procedure for periodic review of the ERP to ensure its continuing relevance and effectiveness?	YES				
		NO				
		PARTIALLY				

No.	Aspect to be analyzed or question to be answered	Answer	Status of implementation	implementation Target Date	Reference Document	Action Required
Element 1.5 – SMS Documentation						
1.5-1	Is there a top-level SMS document or exposition document which is approved by the accountable manager?	YES				
		NO				
		PARTIALLY				
1.5-2	Does the SMS documentation address the organization’s SMS and its associated components and elements?	YES				
		NO				
		PARTIALLY				
1.5-3	Is Senior Resource Association SMS framework in alignment with the regulatory SMS framework?	YES				
		NO				
		PARTIALLY				
1.5-4	Does Senior Resource Association maintain a record of relevant supporting documentation pertinent to the implementation and operation of SMS?	YES				
		NO				
		PARTIALLY				
1.5-5	Does Senior Resource Association have an SMS implementation plan to establish its SMS implementation process, including specific tasks and their relevant implementation milestones?	YES				
		NO				
		PARTIALLY				
1.5-6	Has the SMS implementation plan been endorsed by the accountable executive?	YES				
		NO				
		PARTIALLY				

No.	Aspect to be analyzed or question to be answered	Answer	Status of implementation	implementation Target Date	Reference Document	Action Required
Component 2 – Safety Risk Management						
Element 2.1 – Hazard Identification						
2.1-1	Is there a process for the reporting of voluntary hazards/threats by all employees?	YES				
		NO				
		PARTIALLY				
2.1-2	Is the process of reporting voluntary hazards/threats simple, available to all personnel involved in safety-related duties and commensurate with the size of the service provider?	YES				
		NO				
		PARTIALLY				
2.1-3	Is the accident/incident reporting simple, accessible to all personnel involved in safety-related duties and commensurate with the size of the service provider?	YES				
		NO				
		PARTIALLY				
2.1-4	Does Senior Resource Association have procedures for investigation of all reported incidents/accidents?	YES				
		NO				
		PARTIALLY				
2.1-5	Are there procedures to ensure that hazards/threats identified or uncovered during incident/accident investigation processes are appropriately accounted for and integrated into the organization’s hazard collection and risk mitigation procedure?	YES				
		NO				
		PARTIALLY				

2.1-6	Are there procedures to review hazards/threats from relevant industry reports, for follow-up actions or risk evaluation where applicable?	YES				
		NO				
		PARTIALLY				
No.	Aspect to be analyzed or question to be answered	Answer	Status of implementation	implementation Target Date	Reference Document	Action Required

Component 3 – Safety Assurance

Element 3.1 – Safety Performance Monitoring and Measurement

3.1-1	Are there identified safety performance indicators for measuring and monitoring the safety performance of the organization's activities?	YES				
		NO				
		PARTIALLY				
3.1-2	Are the safety performance indicators relevant to the organization's safety policy as well as management's high-level safety objectives/goals?	YES				
		NO				
		PARTIALLY				
3.1-3	Do the safety performance indicators include alert/target settings to define unacceptable performance regions and planned improvement goals?	YES				
		NO				
		PARTIALLY				
3.1-4	Is there a procedure for corrective or follow-up action to be taken when targets are not achieved and alert levels are exceeded/breached?	YES				
		NO				
		PARTIALLY				

3.1-5	Are the safety performance indicators being periodically reviewed?	YES				
		NO				
		PARTIALLY				
Component 4 – Safety Promotion						
Element 4.1 – Training and Education						
4.1-1	Is there a program to provide SMS training/familiarization to personnel involved in the implementation or operation of the SMS?	YES				
		NO				
		PARTIALLY				
4.1-2	Has the accountable executive undergone appropriate SMS familiarization, briefing or training?	YES				
		NO				
		PARTIALLY				
4.1-3	Is the Senior Resource Association SMS manual and related guidance material accessible or disseminated to all relevant personnel?	YES				
		NO				
		PARTIALLY				

APPROVAL BY:

	Chris Stephenson	
SIGNATURE OF PERSON RESPONSIBLE FOR SAFETY MANAGEMENT SYSTEM	PRINTED NAME	DATE
	Karen Deigl	
SIGNATURE OF ACCOUNTABLE EXECUTIVE	PRINTED NAME	DATE