



Public Transportation Agency Safety Plan (PTASP)



LAKE COUNTY OFFICE OF TRANSIT SERVICES:

MAN-SMS-101

TAVARES, FLORIDA

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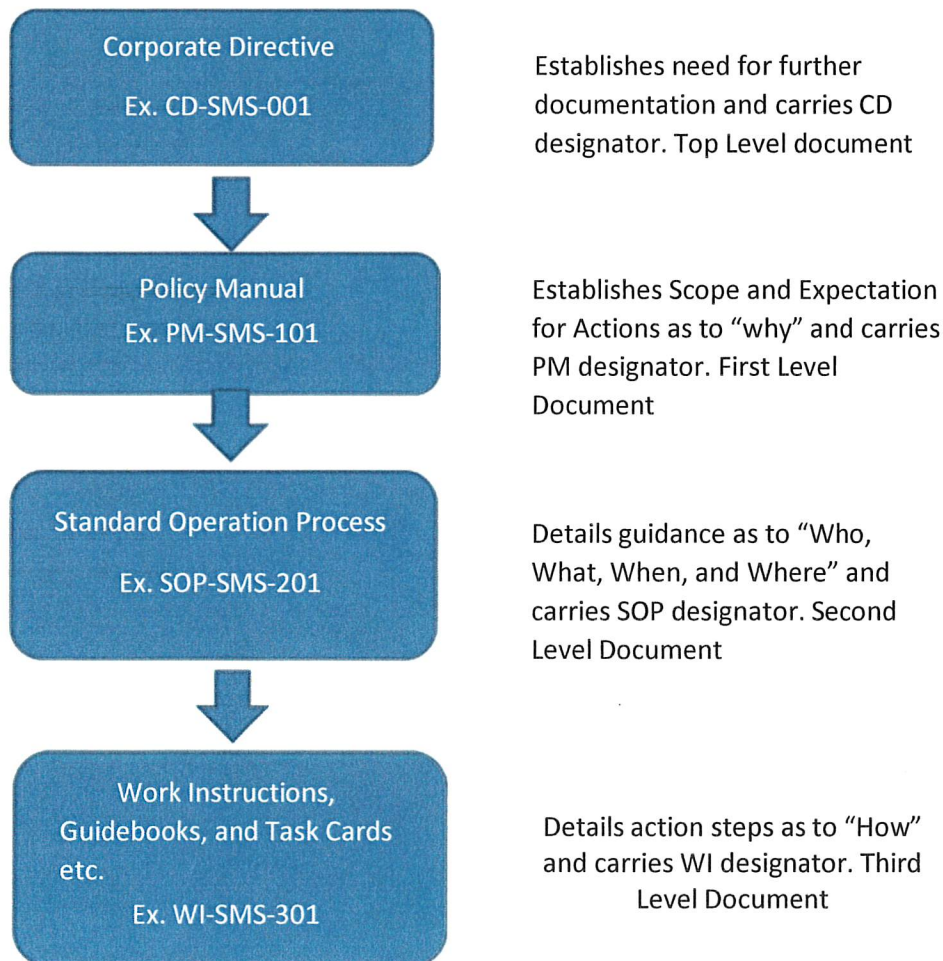
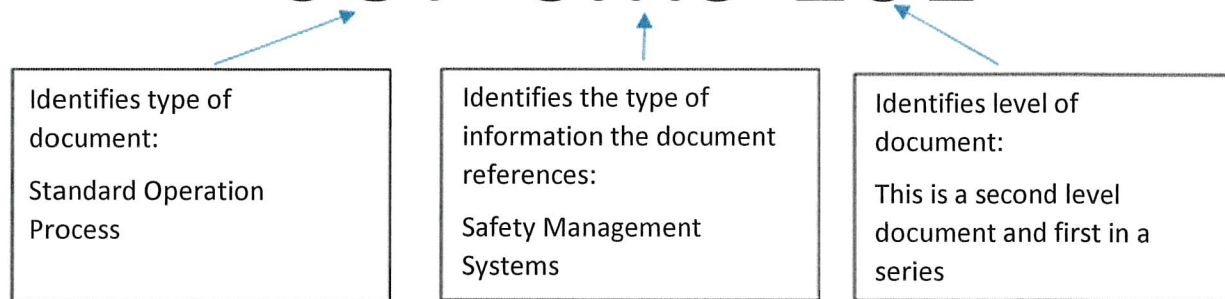
Revision: Original

Establishment

This manual is developed and written per The Lake County Office of Transit Services – Establishment of Safety Management Systems

Documentation Hierarchy

SOP-SMS-201



Revision: Original

Signature Page

Below is the contract organization accountable manager and SMS Manager/Coordinator approval for this Safety Management System (SMS) manual. Electronic verification of approvals is maintained within the Office of Transit Services.

Contract Organization	Location	Accountable Manager (Name & Title)	SMS Manager (Name & Title)
Lake County Office of Transit Services	Tavares, Florida	Jill Brown, Director	Randy Van Alstine, Transit Operations

Revision Process

The SMS Manual Revision process consists of submitting a Change Request Form. The requestor shall complete the form in the revision description, detail any known or potential regulatory or operations impact, process change or other consequence of the revision.

Records of Revision

Manual Holder: Electronically published

Manual Number: MAN-SMS-101

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

Revision Number	Dated	Date Filed	Filed By
Original	12-10-2020		Jill Brown

Master List of Updates

The below noted updates are incorporated into this manual:

Section	Update Details
Original	Not Applicable – Original

Certification



BUS TRANSIT SYSTEM

ANNUAL SAFETY CERTIFICATION AND ADOPTION

Date: December 22, 2020
Name: Lake County Board of County Commissioners
Address: 315 West Main Street
Tavares, Florida 32778-7800

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

1. The adoption of the Lake County Office of Transit Services Safety Management System for calendar year 2020.
2. Compliance with adopted standards of the Public Transportation Agency Safety Plan (PTASP), for calendar year 2020.
3. Performance of safety inspections on all buses operated in accordance with FAC Rule 14-90.009, for calendar year 2020.

Signature: _____

Name: Jill M. Brown
Title: Transit Services Director

List of Acronyms

The following acronyms apply to all related information in this manual.

ACC/INC – Accident/Incident

ALARP – As Low as Reasonably Practicable

DIR – Director

EI – Effective Event Investigation

ERT – Event Review Team

FDOT- Florida Department of Transportation

FTA – Federal Transit Administration

GM – General Manager

HazRep – Hazard Report

MGR – Manager

MHR – Maintenance Hazard Report

NM – Near Miss

OHR – Operations Hazard Report

RA – Risk Assessment

SARPS – Standards and Recommended Practices

SMS – Safety Management System

SMT – Site Management Team

SSC – Site Safety Council

SSP- System Security Plan

SSPP- System Safety Program Plan

VP – Vice President

List of Definitions

The following definitions apply to all related information in this manual.

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

Accident – An unfortunate incident that happens unexpectedly and unintentionally, typically resulting in damage or injury.

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

Disposition Period - The period of time between knowledge of an incident and when the employee is found culpable or not.

Near Miss Report - A report filed from a narrowly avoided collision or other accident.

Accident/Incident Report - A report filed regarding an accident or incident.

Hazard - A potential source of danger.

Near Miss – A narrowly avoided collision or other accident.

Investigation- A formal inquiry or systematic study.

Physical Property Damage - Damage sustained to a building or items on the grounds of real estate.

Recordable Injury – Injury resulting in lost time at work.

Reporting Manager- An employee's direct supervisor.

Risk – A situation involving exposure to danger.

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

Root Cause – The exact cause of an incident or accident where had the root cause found not to be present, the accident or incident would not have happened.

Safety - The condition of being protected from or unlikely to cause danger, risk, or injury.

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

Site – The physical location of an operational entity.

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

1

Chapter One

1.0 Introduction

1.1 Reference: Safety Management System (SMS)

1.2 Purpose: This manual describes the Safety Management System supporting operation of Lake County Transit.

1.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

1.4 General: This manual establishes the SMS policies for all employees and contracted employees of Lake County Transit.

1.5 Issue and Update: The control of this manual is in accordance with the Process for SMS Information Management specified in Chapter 12, Information Management. This manual will be reviewed and updated, as applicable, annually beginning on date of issuance.

Immediate changes to this manual may be authorized by Lake County Transit in the form of a signed SMS Manual Immediate Change Memo. Lake County Transit USA will communicate immediate changes to all concerned through email and SMS website postings.

1.6 Scope: Lake County Transit SMS has been established consistent with business needs and regulatory impetus. The SMS is designed to reduce safety risks to an acceptable level through a continuous process of hazard identification and safety risk management practices to achieve the following goals:

- Reducing transit safety, employee, and environmental risks by better managing Lake County Transit 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 contract organization SMS and risk controls.
- Compliance with all applicable state and federal regulations.
- Foster a culture of change management so that safety issues are identified and risks are eliminated or reduced in the planning process and delays or other impediments to business goals are avoided.

1.7 System Description:

1.7.1 Services provided and history:

Lake County is located in East Central Florida and is bordered by seven counties, including Volusia, Seminole, Orange, Osceola, Polk, Sumter, and Marion Counties. According to the Census, the County is composed of 1,157 square miles, with 953 square miles of land area and 204 square miles of water area.

Lake County Transit provides both fixed route and paratransit public transportation. The paratransit service area is all of Lake County. Also, the Community Transportation Coordinator (CTC) does provide services outside of Lake County for medical purposes to Orange, Alachua and Sumter Counties. Other areas are approved when services are not available in the county.

On June 7, 1983, Lake Sumter Mental Health Center and Hospital was designated as the Transportation Disadvantaged (TD) Provider for Lake County by the TD Advisory Committee of the Lake County Board of County Commissioners and the East Central Florida Regional Planning Council. In November 1990, Lake Sumter Mental Health Center and Hospital was recommended by the Lake County Board of County Commissioners, which is the County's Designated Official Planning Agency, and approved by the State of Florida Commission for the Transportation Disadvantaged (CTD) to be the CTC for Lake County. In September 1992, Lake Sumter Mental Health Center and Hospital changed its name to LifeStream Behavioral Center.

Beginning in 2001, the Lake County Board of County Commissioners became the County's CTC, and subsequently contracted with LifeStream for the management and provision of TD service in Lake County (which LifeStream provided as "Lake County Transit").

On May 3, 2005 the Lake County Board of County Commissioners entered into an agreement with a contracted operator for paratransit.

LakeXpress, the fixed-route system initiated in 2007, is also provided under contract and continues to successfully operate service on seven routes.

LakeXpress provides approximately 354,000 fixed route trips annually. Lake County Connection, the paratransit program, provides approximately 100,000 paratransit trips annually.

Several State and Federal grant programs help fund the transit system. (Commission for Transportation Disadvantaged, FDOT State Block Grants, FTA 5310, 5311, 5307, 5339 and Cares Act grants)

1.7.2 System Profile:

Lake County Transit operations is a complete brokerage. Fixed Route and paratransit operations are contracted out. Fleet maintenance operations is also contracted out.

Lake County received the following grants

Community Transportation Coordinator (CTC): Yes ☒ No ☐

CTC Operator: Yes ☐ No ☒

CTC Name: Lake County Board of County Commissioners

Contracted passenger service operations: (Describe) Lake County operates fixed route and paratransit operations as a complete brokerage.

Contract operator(s) has own adopted SMS and SPP:

Yes ☐ No ☒ Describe Both entities have SMS and SPP's The Contractor documents must comply with the County documents.

Contract operator(s) adopts and implements the transit system's or CTC's SMS and SPP:

Yes ☒ No ☐ Describe See above

Total Number of drivers: 49

Full-time: 43

Part-time: 6

Volunteers:

Number of operational buses: 63

Buses W/C accessible: 63

Number of Type I buses (>22' length): 12 Type II buses (<22' length): 51

Dispatch Location(s): RATP Dev, and Lake County Office of Transit Services

RATP Dev

560 E Burleigh Blvd

Tavares, FL 32778

Maintenance Locations: RATP Dev

Lake County Transit

2440 US Highway 441/27

Fruitland Park, FL 34731

1.7.3 Contracted Service Operator(s) Certification:

Lake County Transit requires all contract service operators to fully comply with the established safety standards set forth in the SMS, PTASP and Rule FAC 14-90. Contract operators have the option to either adopt and implement the SMS and SPP of Lake County Transit, or develop, adopt, and implement their own program plans, but must ensure compliance with SMS and FAC Rule 14-90. If the contract service operator opts to develop their own SMS and SPP, the program plans must be reviewed and approved by Lake County Transit management prior to initiation of service. In addition, each contractor/subcontractor shall submit a safety and security certification to Lake County Transit no later than January 15, annually for the prior calendar year period.

The certification shall attest to the following:

- The adoption of an SMS and an SPP in accordance with established standards set forth in FAC Rule 14-90.
- Compliance with its adopted SMS and SPP.
- Performance of safety inspections on all buses operated by the system in accordance with FAC Rule 14-90.
- Reviews of the SMS and SPP have been conducted to ensure they are up to date.

The certification shall include:

- The name and address of the contractor/subcontractor, and the name and address of the entity(ies) who performed bus safety inspections and security assessments during the prior calendar year, if different from that of the contractor/subcontractor.
- A statement signed by an officer or person directly responsible for management of the contractor/subcontractor attesting to compliance with FAC Rule 14-90.

Contractors/subcontractors are subject to audits and inspections on an announced or unannounced basis at the discretion of Lake County Transit management. Lake County Transit, or its contractor, will conduct safety and security reviews of contract operators, at least once every three years, to ascertain compliance with the provisions of the SMS and FAC Rule 14-90. Lake County Transit will prepare and submit a report of the audit to the affected contract operator within 30 business days of completion of the review containing the following:

- Identification of the findings, including a detailed description of any deficiency.
- Required corrective action and a schedule for implementation of the corrective action to be taken for each deficiency.
- Any required suspension of bus transit system service should Lake County Transit determine the continued operation of the service, or a portion thereof, poses an immediate danger to public safety.

If the contract operator fails to correct specific deficiency(ies) in accordance with FAC Rule 14-90 and the established implementation schedule, Lake County Transit will notify the FDOT District Office and initiate actions to dismiss the contract.

2

Chapter Two

2.0 Safety Responsibilities

2.1 Reference: Safety Management System

2.2 Purpose: To establish accountabilities for safety operations.

2.3 Responsibilities: Established in this section.

2.4 General: To establish accountability for safety.

2.5 Organizational Levels and Roles:

2.5.1 Lake County Office of Transit Services Roles

- o Director/Accountable Executive: Provides strategic direction for safety policy, risk mitigation, safety assurance and safety promotion.
- o Operations Supervisor/ 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.

2.5.2 Contract Organization Roles and Responsibilities

- o **General Manager:** The accountable executive within each site operation. Provides site leadership in the implementation, operation and performance of site level SMS activities.
- o **Operations Manager:** Communicates and enables site safety policy related to SMS. Promotes operational safety, environmental responsibility, and employee health and safety on and off the job.
- o **Maintenance Manager:** Manages function related to site level maintenance activities.
- o **Facilities Manager:** Manages function related to site level facilities activities.
- o **Safety Manager:** Manages functions related to EHS and operational safety.
- o **SMS Manager:** Serves as the focal point of contact for SMS activities and coordinates SMS activities at the site level.

2.5.3 Site SMS Teams/Councils

- o Site Safety Council: The council is the driving force for ensuring that reported safety items are appropriately addressed, concluded, tested, and that the originator of the report is notified of requisite action.
- o Site Event Review Team: A Site Event Review Team is a collection of identified site personnel representing various parts of the organization that convene post-accident/incident if investigation findings suggest that disciplinary action may be appropriate.
- o Site Management Team: The SMT is then charged with championing/sponsoring and providing overall support for SMS related activities, to include proliferation of resources, monetary or otherwise.

2.5.4 All Site Personnel

- o 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.

2.6 Lake County Transit SMS Contacts

Name	Role/Location	Contact Information
Jill Brown	Director/ Accountable Executive	jmbrown@lakecountyfl.gov
Randy Van Alstine	Transit Operations Supervisor/ Chief Safety Officer	rvanalstine@lakecountyfl.gov
Rickey Mack	General Manager/ Accountable Executive Contractor Level	rickey.mack@ratpdev.gov
Carlos McLean	Operations Manager	carlos.mclean@ratpdev.com
Shawn Held	Maintenance Manager	shawn.held@ratpdev.com
Curtis Kunselman	Safety and Training Manager/ Chief Safety Officer Contractor Level	curtis.kunselman@ratpdev.com

2.7 Roles and Responsibilities

Accountable Executive Role and Responsibilities

The Lake County Office of Transit Services Director is designated the Accountable Executive for the SMS. The Director Controls and directs human and capital resources needed to develop and maintain the ASP, SMS, and Transit Asset Management Plan;

- Designates a Chief Safety Officer with a direct line of reporting to the Accountable Executive;
- Issues annual SMP statement and safety objectives;
- Ensures that ST's SMS is effectively implemented throughout the system;
- Ensures action is taken to address substandard performance in ST's SMS;
- Monitors ST's safety performance;
- Accepts safety risk associated with hazards or mitigates unacceptable safety risk; and
- Assumes ultimate responsibility for carrying out ST's ASP and SMS.

Chief Safety Officer Role and Responsibilities

The Director has designated the Transit Operations Supervisor as the SMS Chief Safety Officer. The Chief Safety Officer is responsible for:

- Facilitating full implementation of the SMS across Lake County Transit;
- 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;
- Managing the SRM and Safety Assurance processes and outputs;
- Facilitating coordination of SRM, evaluations and investigations, and controls with special attention to cross-organizational impacts;
- Monitoring the safety performance of Lake County Transit operations and activities through formal data collection and analysis; and

- Tracking safety-critical issues and corrective actions to conclusion, using appropriate tracking systems.
- Leading and facilitating hazard analyses through workshops with appropriate subject matter experts;
- Leading internal safety audits with support from appropriate Lake County Transit divisions;
- Developing and coordinating the provision of the data and dashboards for tracking and monitoring safety performance; and
- Developing and maintaining safety training requirements and matrix.

In addition, the Chief Safety Officer is responsible for advising Lake County leadership on safety- related issues.

Contractor Roles and Responsibilities:

Managers Roles and Responsibilities:

All contracted managers are accountable and responsible for:

- Upholding and promoting safety policies, and safety risk management, safety assurance, and safety training and communication protocols;
- Developing safety performance measures and targets;
- 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 Lake County Transit safety performance;
- Ensuring that all employees are trained in SMS;
- Supporting and requiring employees within their department to participate in safety training activities;
- Integrating SRM into existing processes;
- Requiring that all relevant safety information is communicated and used in decision-making;
- Ensuring that all system changes are coordinated, documented and go through the SMS process;
- Cooperating with and providing support for evaluations and audits conducted.

Revision: Original

3

Chapter Three

3.0 Safety Policy

3.1 References: Safety Management System

3.2 Purpose: To establish the SMS Safety Policy

3.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

3.4 General SMS Safety Policy Statement:

The management of safety is one of our core business functions. Lake County Transit 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.

Lake County Transit commitment is to:

- **Support** the management of safety through the provision of appropriate resources, that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- **Integrate** the management of safety among the primary responsibilities of all managers and employees;
- **Clearly define** for all staff, managers and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of our safety management system;
- **Establish and operate** hazard identification and analysis, and safety risk evaluation activities, including an employee safety reporting program as a fundamental source for safety concerns and hazard identification, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities 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, gross negligence, or a deliberate or willful disregard of regulations or procedures;
- **Comply with**, and wherever possible exceed, legislative and regulatory requirements and standards;
- **Ensure** that sufficient skilled and trained human resources are available to implement safety management processes;
- **Ensure** that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills;
- **Establish** and measure our safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- **Continually improve** our safety performance through management processes that ensure that appropriate

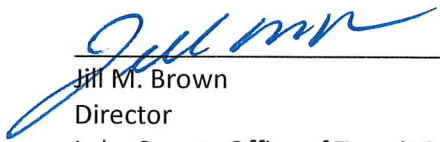
safety management action is taken and is effective; and

- **Ensure** externally supplied systems and services to support our operations are delivered meeting our safety performance standards.

3.5 Values and Guiding principles:

- Integrity
- Commitment to Safety
- Commitment to Continuous Improvement
- Commitment to Compliance

[Signature and Original Copy on File]



Jill M. Brown
Director
Lake County Office of Transit Services

4

Chapter Four

4.0 Safety Culture Policy

4.1 Reference: Safety Management System

4.2 Purpose: This policy identifies the Lake County Transit philosophy and process required to establish and maintain an appropriate safety/just culture that supports our SMS through proactive risk identification and event management considering human factors and a balanced guiding principle on employee disposition following an event.

4.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

4.4 General Safety Culture Policy:

Lake County Transit is committed to creating and sustaining a safety culture environment that supports our SMS and recognizes that several 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 Lake County Transit, 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

Lake County Transit recognizes that employee actions that contribute to hazards and events may be the result of a wide spectrum of behaviors. These include unintentional error, engaging in at-risk behavior (i.e., moving away from desired behavior, not recognizing risks involved or reckless behavior, i.e., an unacceptable choice that knowingly puts an employee, customer or product in harm's way).

The Lake County Transit policy regarding these behaviors is as follows:

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

We are committed to creating an open and fair safety culture with Lake County Transit 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.

[Signature and Original Copy on File]



Jill M. Brown
Director

Lake County Office of Transit Services

5

Chapter Five

5.0 Hazard and Near-Miss Reporting

5.1 Reference: Safety Management System

5.2 Purpose: To establish the scope of hazard and near-miss reporting for the SMS.

5.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

5.4 General:

The Lake County Transit 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.

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

The Lake County Transit 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 Lake County Transit's SMS. While post-event accident/incident investigations reveal information about safety hazards, we cannot rely solely on reactive data to expose risk.

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 using one of the following methods:

- Through direct access of the contractor's SMS software (preferred method)
- Submit paper form: Submit Hazard form to supervisor/management
- Notifying supervision/management via phone. Supervision/management is then required to access and report through SMS software.

Reports may be entered through an anonymous portal to the SMS software 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.

Revision: Original

5.5 Non-Punitive Safety Hazard & Near Miss Reporting:

Lake County Transit 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 Lake County Transit 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, Security & Training Department. Lake County Transit 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. Reporting and sharing information with relevant parties creates an opportunity to answer the questions of what happened. 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.

Lake County Transit 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, Lake County Transit 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, Lake County Transit reserves the right to take disciplinary actions as appropriate.

Lake County Transit also reserves the right to take appropriate action in the event that a report indicates: willful violations of law or Citrus Connection 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.

5.6 Process and Process: Reference SOP-SMS-205 and WI-SMS-305

6

Chapter Six

6.0 Risk and Hazard Identification and Assessment

6.1 Reference: Safety Management System

6.2 Purpose: To establish risk assessment policy and protocol

6.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

6.4 General:

The second component of SMS is Risk Management; describing how Lake County Transit identifies, evaluates, tracks and mitigates hazards/risk in the organization and on the transit system. The processes undertaken by the department are provided in sufficient detail to be effectively undertaken. Acceptable risk levels, performance targets and mitigation measures are established.

6.5 Risk Management:

The management of identified hazards is a vital component of the Lake County Transit Safety Management System. A hazard is defined as a condition or set of conditions, internal or external to the Lake County Transit 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 are identified in several different internal and external sources. Hazards may be observed in the operating environment, through procedures, during system modifications and capital projects, accidents, extensions, or operational changes. The Hazard Management Program applies to all Lake County Transit employees and obligates everyone to constantly observe hazards in their work areas and report them 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
- f. Ongoing reporting to the Office of Transit Services management relating to hazard management activities and status.

6.6 Hazard Management:

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

The Office of Lake County Transit Services plays a key role in the hazard management process and ensure that the process has been fully integrated within their departments. Managers also ensure the following elements of 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 a hazard identification software or form;

- b. Ensure hazards are logged for tracking and documentation:
- c. Representation of the Office of Transit Services management or select designee to represent management on the safety committee:
- d. Ensure each hazard has been assigned to a specific individual / Point of Contact (POC):
- e. Ensure employees receive appropriate hazard management training.

6.7 Hazard Identification:

By means of safety data acquisition and analysis and coordination with Contracted Operator Operations Manager and County Maintenance Manager, the Contracted Operator Safety/Risk Manager will identify system hazards on an ongoing basis.

6.8 Hazard Categorization:

Once the key system hazards have been identified, the Safety/Risk Manager will categorize the hazards based on severity and probability of occurrence.

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

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

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

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

6.9 Hazard Resolution:

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

Hazard Resolution Matrix	Catastrophic	Critical	Marginal	Negligible
Frequent	Unacceptable	Unacceptable	Unacceptable	Acceptable with reservation
Probable	Unacceptable	Unacceptable	Undesirable	Acceptable with reservation
Occasional	Unacceptable	Undesirable	Undesirable	Acceptable
Remote	Undesirable	Undesirable	Acceptable with reservation	Acceptable
Improbable	Acceptable with reservation	Acceptable with reservation	Acceptable with reservation	Acceptable

The results of the analysis will be shared by the Safety/Risk Manager with the Transportation Director on an ongoing basis to identify appropriate actions. All “unacceptable” hazards must be eliminated and measures will be taken for the remaining risk acceptance categories to minimize risk. The results of such analysis will be shared with agency staff and law enforcement agencies on a quarterly basis for awareness and support.

7.0 Accident / Incident / Near Miss Investigations and Reporting

7.1 Reference: Safety Management System

7.2 Purpose: In order to promote the continuous safety performance improvement of the SMS, Lake County Transit will promptly and thoroughly investigate events that result in safety of transit risk, product, service, and employee safety risk. Near-miss incidents are investigated if it is not readily determined the root cause of the near-miss.

7.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

7.4 General:

For the purpose of this SMS, events are considered accidents or incidents that involve a transit vehicle or take place on Lake County Transit controlled property. An “accident” is an event that causes damage to a vehicle, individual, or property while the vehicle is in motion. It may involve a single vehicle or multiple vehicles. An “incident” is defined as an event that causes damage to a vehicle, individual, or property, which is not an accident.

Any event involving a bus or taking place on property controlled by a transit system and resulting in a fatality, injury, or property damage will be investigated by The Lake County Transit Contracted Operator. All events included but not limited to the following, will be investigated:

- A fatality, where an individual is confirmed dead within 30 days of a bus transit system related event, excluding suicides and deaths from illnesses.
- Injuries requiring immediate medical attention away from the scene for two or more individuals.
- Property damage to bus transit system buses, non-bus transit system vehicles, other bus system property or facilities, or any other property. The Lake County Transit Contracted Operator will have the discretion to investigate events resulting in property damage less than \$1,000.
- Evacuation of a bus due to a life safety event where there is imminent danger to passengers on the bus, excluding evacuations due to operational issues.

In all events, drivers are required to contact the local law enforcement, dispatcher, or emergency medical services (as required) immediately. Supervisors will be sent to the scene depending on the severity of the event at the discretion of the Operations Manager. Each investigation will be documented in a final report that includes a description of the investigation activities, identified root causes and any identified corrective action plan. Each corrective action plan will identify the action to be taken by the bus transit system and the schedule for its implementation. The Contracted Operator will monitor and track the implementation of each corrective action plan. Investigation reports, corrective action plans, and related supporting documentation will be maintained by the Contracted Operator for a minimum of four years from the date of completion of the investigation.

The Contracted Operator shall require their dispatchers to notify the Coordinator during regular business hours, immediately after they notify 9-1-1 or any law enforcement or accident

investigation agency. If the accident occurs after regular business hours and injuries are involved or suspected, the Coordinator shall be notified by telephone or pager.

The Contracted Operator shall complete an "Accident/Incident Review Form". This form shall be emailed to the Coordinator office within 24 hours of any traffic accident. The original shall be delivered to the Coordinator office within one week.

The Contracted Operator shall provide one original copy of the final report of any official law enforcement or accident investigation agency. The copy of this report shall be delivered to the Coordinator office as soon as it becomes available.

7.5 Investigation Roles and Responsibilities:

Investigations are a methodical search into an event where information relating to factors that may have caused or contributed to the event are discovered. The SMS uses a structured investigative process where evidence, contributing factors and root cause are recorded so that follow-up mitigating actions may be tracked.

As with any investigation, time is of the essence, therefore investigations should proceed as soon as practical to avoid potentially losing valuable information. Investigations are to be concluded within 5 business days of the incident. Only trained investigators are to conduct investigations and under no circumstance may an investigator examine his/her own work area incident.

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.
3. Preventative strategies recommendations are prepared and recorded.

For near-miss reports, a full investigation may not be required. In this case, the SMS Manager, will determine the level of investigation appropriate to effectively address the report.

Report any product damage, physical property damage, transit safety issue, immediately to their supervisor or appropriate management personnel.

8

Chapter Eight

8.0 Safety Performance Monitoring

8.1 Reference: Safety Management System

8.2 Purpose: To establish policy for safety performance monitoring

8.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

8.4 General:

Safety assurance is the means to demonstrate that organizational arrangements and processes for safety achievement are properly applied and continue to achieve their intended objectives. This is achieved through safety performance monitoring and measurement processes by which the performance is verified against the safety policy, stated safety objectives and targets.

The safety assurance process within Lake County Transit is achieved by monitoring and measuring the outcomes of activities that operational personnel must engage in for the delivery of services by the organization.

8.5 Safety Performance Indicators:

8.5.1 Objectives:

The overall SMS objectives incorporated in the safety policy should be supported by a set of underlying tangible safety objectives, typically set by the leadership team. These cover relevant aspects of the department's safety vision, senior management's commitment, realistic, measurable safety milestones and desired outcomes.

8.5.2 Targets:

Safety performance targets are created in relation to each safety objective such that the organization remains aware of whether the relevant objectives are being met. These safety performance targets are measured and monitored in conjunction with the use of safety performance indicators.

The Lake County Transit has set the following performance targets for LakeXpress using the safety performance criteria established under the National Public Transportation Safety Plan (NSP), and the state of good repair standards established in the regulations that implement the National Transit Asset Management System and are included in the NSP. These are delineated in Section 5 - Safety Assurance. The targets were established using the average # of occurrences for each NSP safety performance measure category within the NSP submitted to the National Transit Database (NTD) for the last five (5) years by the Contract Operator (RATP Dev); delegated with the oversight for Operations and Fleet Maintenance NTD Performance data collection:

Safety Performance Targets							
Performance Targets are based on collected data from the previous five years for LakeXpress							
Mode of Transit Service	Fatalities Total	Fatalities (per 100,000 vehicle revenue miles (VRM))	Injuries Total	Injuries (per 100,000 vehicle revenue miles (VRM))	Safety Events Total	Safety Events (per 100,000 vehicle revenue miles (VRM))	System Reliability (100,000 VRM/failures)
Fixed Route Bus	0	0	45	0.00002	19	0.000007	12,534
ADA Paratransit	0	0	27	0.000006	9	0.000002	40,813

8.5.3 Indicators:

Safety performance indicators are generally data-based expressions of the frequency of occurrence of events, incidents, or reports. The indicators chosen should correspond to and support the relevant safety objectives.

Sample Objective, Target and Indicator:

- Objective: Reduce product damage costs
- Target: 50% reduction in scrapes, scratches, and dings (compared to previous calendar year)
- Indicator: <2 incidents per bus per week

Agencies Coordination

Lake County Transit will aid in the planning process will make its safety performance targets available to the FDOT and the Lake Sumter Metropolitan Planning Organization (MPO) each year after its formal adoption by the County and will also coordinate with both in the identification of safety performance targets.

Agency Coordination		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Florida Department of Transportation (FDOT)	1/7/2021
Targets Transmitted to the MPO	Metropolitan Planning Organization Name	Date Targets Transmitted
	Lake County Lake Sumter Metropolitan Planning Organization (MPO)	1/7/2021

8.6 Safety Oversight:

Lake County Transit obtains information for safety performance monitoring from a variety of sources including direct employee input, a hazard reporting system, meetings, or assessments/audits.

Each of these types of information sources may exist to some degree in every site and should be assessed on a routine schedule for risk identification and trend analysis. Lake County Transit will accomplish continual safety performance monitoring and oversight of the SMS as indicated below.

8.6.1 Lake County Office of Transit Services Safety Performance Oversight: As a part of the annual safety objectives and targets development process, the Lake County Office of Transit Services will establish the initial list of safety objectives and targets for the transit system in conjunction with the contractor leadership team.

8.6.2 Contractor/Site Safety Performance Oversight: Monthly reviews are scheduled by the contractor/local management team and SSC, which examine for safety performance and means to continually improve safety performance.

Once data from all safety-related activity is reviewed, the local management team and SSC will ensure that the site risk register (Drive2Zero) is revised for each activity/item and that the appropriate information is communicated to the workforce. This includes updating the response/mitigation proposed and an assessment of the appropriateness and effectiveness of the mitigations to address the hazards or event contributing factors.

The mitigation will be considered as appropriate if it actually addresses the hazard. The mitigation will only be considered effective if it consistently manages the safety risk under normal operating conditions in order to reduce the safety risks to an acceptable level as defined by the risk assessment performed using the risk assessment tool in Drive2Zero. The SSC will also propose prioritization of the responses/mitigations based on the risk assessment for each hazard.

8.7 Process and Process: Reference SOP-SMS-209 and WI-SMS-309

9

Chapter Nine

9.0 SMS Communication

9.1 Reference: Safety Management System

9.2 Purpose: To articulate a SMS communication strategy designed to establish regular SMS – related communications at all levels of the organization.

9.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

9.4 General:

The Lake County Transit 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 closed-loop communication (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
- Conveying SMS activity updates
- 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 both internal and external communication/awareness.

9.5 Internal Communication:

Internal communication/awareness may be accomplished through the use of:

- Notice boards
- Intranet postings
- Regular safety meetings and/or training sessions
- SMS advisories (local and corporate)
- Telephone or email communications

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

- The importance of conformance and the potential consequences of non-conformance with SMS policy, processes or procedure
- Individual roles and responsibilities in achieving conformance with SMS Process
- The risks associated with work activities revealed from SMS data
- Relevant output from management SMS reviews
- Local/site reported hazards/near-misses and incidents
- Enterprise hazards/near-misses and incidents of note and relevance
- Changing SMS requirements

- SMS performance data
- Key results of internal/external assessments and audits
- Other information needed to support the SMS

9.6 External Communication:

Lake County Transit 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.

The Director of Communications or designee is responsible for media communications regarding SMS issues and in consultation with HR/legal company entities where appropriate.

9.7 Process and Process: Reference SOP-SMS-210 and WI-SMS-310

10

Chapter Ten

10.0 Training, Awareness & Competence

10.1 Reference: Safety Management System

10.2 Purpose: To establish a corporate-level approach which ensures that all employees have the appropriate level of knowledge about the Lake County Transit SMS and how the policies, processes and procedure affect how they perform their duties. 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.

10.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

10.4 General:

Lake County Transit 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 SMS manual, website and subsequent use
- The importance of conformance with SMS
- Individual roles and responsibilities specific to the SMS (Safety Accountabilities)
- General hazard reporting requirements of the SMS
- General risk assessment procedure of the SMS
- General accident/incident or near-miss reporting and investigation requirements
- General responsibilities with respect to the SMS emergency preparedness and response plan

Lake County Transit's SMS training takes into account different levels of responsibility, ability, literacy, 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, Lake County Transit 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, SMS processes management, management commitment and responsibilities, hazard identification and risk management, safety performance monitoring responsibilities.
- Frontline personnel: SMS Overview, safety policy, safety culture policy, safety reporting, hazard identification and risk assessment procedure, accident/incident investigation process

10.5 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, accident/incident investigation findings and department or process-specific SMS standard operating process development where appropriate
- Consulted where there are workplace changes that occur as a result of SMS-related activities
- Be represented in SMS matters at their site
- Informed as to who their site safety council representatives are
- 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.

Employee involvement shall be accomplished by:

- Submission of hazard reports
- Involvement in risk assessment results and post-event investigation findings implementation
- Participation in site safety performance monitoring
- Participation in SMS assessments
- Involvement in site safety councils

Managers Shall:

- Be involved in the review of hazard and risk assessments, accident/incident investigation findings and department or process-specific SMS standard operating process development where appropriate
- Coordinate workplace changes that need to occur as a result of SMS-related activities
- Lead resolution of SMS matters at their site
- Direct their site safety council representatives in ad hoc and regular safety performance reviews
- Coordinate resolution of significant issues arising from the operation of the SMS at their site, including lessons-learned from hazards, near-miss reports, and implementation of accident/incident investigation findings.
- Lead monthly site/department safety performance monitoring activities

10.6 SMS Required Training Matrix:

SMS Function/Role	Required Training
Lake County Transit Leadership	SMS-003 – SMS Orientation SMS-002 – SMS Engagement for Leaders
SMS Manager/Coordinator	<u>Initial Training</u> SMS-003 – SMS Orientation SMS-004 – Effective Event Investigation SMS-007 – Introduction to Drive2Zero
SMS Investigator	<u>Initial Training</u> SMS-001 – SMS Orientation SMS-004 – Effective Event Investigation SMS-006 – Drive2Zero for Investigations
ERT or SSC Member	<u>Initial Training</u> SMS-001 – SMS Orientation SMS-009/10 – ERT/SSC Charter **SMS-004 is recommended, not required
All Personnel	<u>Initial Training</u> SMS-003 – SMS Orientation SMS-007-Introduction to Drive 2Zero

11

Chapter Eleven

11.0 Information Management

11.1 Reference: Safety Management System

11.2 Purpose: To establish the information management processes for the Lake County Transit SMS.

11.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

11.4 General:

For operation of the SMS, Lake County Transit establishes a Process to respond to the requirement for information management to assist with the establishment and verification of the effectiveness of the SMS.

The SMS information management requirements in this chapter pertain to:

- Oversight of the Lake County Transit and contractor's intranet site related to SMS
- Oversight/updates to the enterprise SMS software solution (Drive2Zero)
- 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

11.5 Process and Process: Reference SOP-SMS-212 and WI-SMS-312

12

Chapter Twelve

12.0 SMS Assessment

12.1 Reference: Safety Management System

12.2 Purpose: To establish SMS assessment policy

12.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

12.4 General:

This chapter provides the guidelines for evaluating the implementation, performance monitoring, and continuous improvement of the Lake County Transit 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. 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:

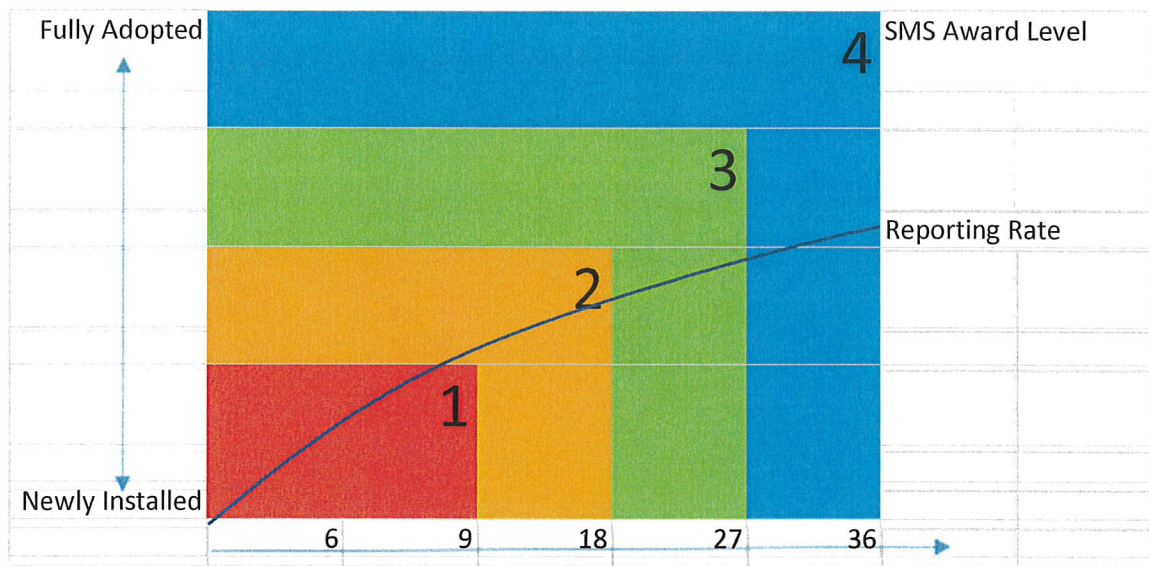
- Overall effective SMS integration
- Assignment of roles and responsibilities for SMS
- Staff performance and accountability for safety
- Management commitment and employee involvement
- Compliance with SMS hazard/risk assessment process
- Effectiveness of safety performance targets and indicators
-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

12.5 Assessment Period: Assessment periods are 2-5 days given the size of the location and are conducted annually per site.

12.6 Scoring Criteria:

- Level 1 – Present
- Foundational components of a functional SMS are present.
- Level 2 – Suitable
- Components are suitable given the size and complexity of the organization written for and are capable of delivering the desired outcome.
- Level 3 – Operating
- There is evidence that the components and subsequent processes and procedures are being used properly.
- Level 4 – Effective

There is objective evidence through safety performance monitoring that the program is reducing the risk footprint of the organization.



12.7 Process and Process: Reference SOP-SMS-213 and WI-SMS-313

12.8 Record Retention: Copies of all assessment records are maintained in Drive2Zero and the Lake County Transit office for a minimum period of 24 months.

13

Chapter Thirteen

13.0 Emergency Response Planning

13.1 Reference: Safety Management System

13.2 Purpose: To establish a plan for responding to an accident.

13.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

13.4 General:

Lake County Transit SMS requires proactive response to transit related incidents and accidents on the part of all employees.

13.5 Plan Review: Emergency Response Plan should be reviewed annually and after the occurrence of significant events. Certain practice drills are to be carried out every two years for emergency scenarios.

13.6 Response/Drill Critique: Emergency responses or drills are carried out by corporate Safety and security personnel and the results thereof are recorded and shared in the interest of continuous improvement. Potential changes to the response plan may be identified by the following methods:

- Review of accidents, incidents, and near-misses
 - ▣ Risk assessment processes
- Appropriation request sign off process
- Project review process
- External evaluation
- Assessments or audits

14

Chapter Fourteen

This section and all subsequent sections are related to the State of Florida Minimum Safety, Operational and Maintenance Requirements, as outlined in the FAC Rule 14-90

14.0 Security Program Plan

14.1 Reference: Safety Management System

14.2 Purpose: Security Program Plan (SPP)

14.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

14.4 General:

In accordance with FAC Rule 14-90, Lake County Transit has adopted, and implemented a Security Program Plan (SPP), which covers the security portion of the system safety program. 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
- Emergency management process and procedures for mitigation, preparedness, response, and recovery
- Procedures for investigation of events described under subsection 14-90 (5), F.A.C.
- Procedures for interagency coordination with local law enforcement jurisdiction
- Requirements for private contract transit providers that engage in continuous or recurring transportation services for compensation as a result of a contractual agreement with the bus transit system
- 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 circumstances. 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 an as-needed basis. Select portions of the SPP may be shared with employees depending on their job responsibilities.

15

Chapter Fifteen

15.0 Driver Qualification, Selection, Training & Testing

15.1 Reference: Safety Management System

15.2 Purpose: To establish a plan for selecting and training operators.

15.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety

Responsibilities

15.4 General:

In accordance with State of Florida FAC Rule 14-90, Lake County Transit contractor management is responsible for ensuring that the minimum standards are met when hiring new drivers. All employees and drivers of Lake County Transit and all contract service providers are required to complete all training and testing requirements 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.

15.5 Qualification and Selection of Drivers:

Lake County Transit contractor 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 (with local law enforcement and the Florida Department of Law Enforcement) and driving records check including, but not limited to, the following items:
 - Driving records
 - Instant Social Security Number validations
 - Instant identification of applicant's county of residence for the past seven years
 - County felony criminal history checks for up to three counties per applicant and other criminal records checks
 - Education verification
 - Employment reference checks
 - Personal reference check
 - Workers' Compensation claims
- Complete employment application.
- Successful completion of pre-employment physical including an eye examination and drug screening test.
- Signed acknowledgement of receipt and agreement to comply with drug-free workplace policy.
- Signed acknowledgment of receipt and agreement to comply with SSPP.
- 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 FAC Rule 14-90.006, F.A.C.
- Personnel licensed and authorized by the bus transit system to drive, move, or road test a bus in order to perform repairs or maintenance services when it has been determined that such temporary operation does not create unsafe operating conditions or create a hazard to public safety are not bound to the following two provisions:
 - 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.
 - Bus transit systems shall provide written operational and safety procedures to all bus drivers before driving on streets or highways unsupervised.

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 Lake County Transit to verify all applicant's background screening in order 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.

15.6 Driver Safety Training and Testing:

All employees and drivers of Lake County Transit and all contract service providers are required to complete all training and testing requirements 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. The Safety Training Manager is responsible for conducting and documenting all training and testing activities utilizing a certification process. Noncompliance with any regulatory or agency specific guideline or requirement may result in suspension or termination of employment. This section of the SSPP discusses the training and testing programs to be administered by the Safety Training Manager.

15.6.1 Initial Driver Training and Testing:

Upon hire and prior to being placed into road service, all drivers are required to complete training and testing in the following areas:

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. Defensive driving.
8. Passenger assistance and securement.

9. Handling of emergencies and security threats.
10. Security and threat awareness.
11. Driving conditions.

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.

In addition, new drivers are required to successfully undergo a road test with an experienced driver. 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.

After successful completion of each training and testing module, the agency is required to document and record the satisfactory completion of the employee's training and submit to the Safety Training Manager. Certificates of completion will be maintained in the driver files for a minimum of 4 years.

All newly hired employees are also provided instructional training by the Safety Training Manager. Drivers are given instruction in Lake County Transit rules and standard operating procedures in the following areas:

- General rules: General rules of the agency including employee conduct codes
- Personal appearance and conduct: Covers uniforms, grooming, and employee conduct.
- Customer service: Covers 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, drug and alcohol testing, and drug and alcohol use restrictions.
- Fare handling: Covers fare collection procedures and provides instruction in dealing with fare disputes, conflict resolution, and notification of security personnel.
- Americans with Disabilities Act requirements: Provides instruction in complying with ADA requirements and providing service to disabled patrons.
- Radio (Nextel) 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: Implements a drug and alcohol testing program.
- Occupational Safety and Health Administration (OSHA) standards: Covers blood borne pathogens and other occupational exposure to health hazards.

The Safety Training Manager will develop and maintain a Training Manual for new hire training and testing of employees as part of the Safety Training Program. The manual will contain training course content, curriculum, lesson plans, testing requirements, etc. All training and testing activities will also be adequately documented by the Safety Training Manager.

15.6.2 On-going/Refresher Training and Testing:

The Safety Training Manager 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 FAC Rule 14-90. The drivers are required to attend training and testing in all areas specified by FAC 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 five years.

15.6.2 Remedial Training and Testing:

Lake County Transit will employ remedial training for drivers who have been involved in a serious collision or have developed unsafe driving behaviour 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 Manager will determine the appropriate remedial training and testing, the results of which will also be documented and retained in files.

15.6.3 NIMS Training:

The National Incident Management System (NIMS) provides a consistent nationwide template to enable all government, private-sector, and nongovernmental organizations to work together during domestic incidents (<http://www.fema.gov/emergency/nims/>). The NIMS system requires that transit agencies comply with a number of specific activities to ensure personnel who will be conducting activities in response to emergencies use the standard Incident Command System (ICS).

Lake County Transit SPP requires that management staff take available NIMS training to understand this requirement and to coordinate regularly with outside organizations to prepare for coordinated responses to incidents. In addition, all employees will be provided security training and drills every six months to ensure they are familiar with emergency policies. All training and testing activities will also be recorded and retained in files.

15.7 Medical Exams for Bus Transit System Drivers:

This section of the SMS establishes Lake County Transit's medical examination requirements for all applicants for driver positions and for existing drivers.

- Medical examination requirements include a pre-employment examination for applicants, an 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 FDOT Form Number 725-030-11, Medical Examination Report for Bus Transit System Driver, Rev. 05/09.
- 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 Lake County Transit.
- 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 four years from the date of the examination.
- Lake County Transit 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.

15.8 Operating and Driving Requirements:

The Lake County Transit Contracted Operator's Operations Manager is responsible for overall compliance with all operating and driving requirements.

Driver schedules are developed in compliance with FAC 14-90. The Operations Manager, Operations Supervisors and Dispatchers monitor daily driving time to ensure no violations occur. Payroll and timecards are reconciled daily by the Lake County Transit Operator's Operations staff to include review of total driving time for drivers. The Lake County Transit Operator will include reporting drivers' hours and compliance with 14-90 requirements as part of their regular monthly reporting to Lake County. Lake County Operations Supervisor will monitor timecards quarterly for compliance.

It is the responsibility of every Lake County Transit Contracted Operator 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.
- The Lake County Transit Contracted Operator management will annually check Motor Vehicle Records (MVR) for all drivers for investigating information on license suspensions, revocations, accidents, traffic violations, unpaid summons, etc. Lake County Transit Contracted Operator 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.
- FAC 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.
- 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 the Maintenance Manager.
- The Maintenance Manager will review daily inspection reports and document corrective actions taken as a result of any deficiencies identified by daily inspections.
- 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 ensure 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.
- Buses will not be refueled in a closed building. The fueling of buses when passengers are being carried will be reduced to the minimum number of times necessary during such transportation.
- 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 with passengers aboard for longer than 15 minutes. The parking or holding brake device will be properly set at any time the bus is left unattended.
- Buses will not be left unattended in an unsafe condition with passengers aboard at any time.
- Drivers are discouraged from leaving keys in the vehicle 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.

16

Chapter Sixteen

16.0 Maintenance Plan

16.1 Reference: Safety Management System

16.2 Purpose: To establish a vehicle maintenance program.

16.3 Responsibilities: See Safety Management System Manual, Chapter 2, Safety Responsibilities

16.4 General:

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. The Lake County Transit vehicle maintenance program will ensure that all buses operated, and all parts and accessories on such buses, including those specified in FAC 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 Manager 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 and Preventative Maintenance Guidelines (included in Appendix C and Appendix D, respectively).

16.5 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-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 a defect 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 the Operations Manager and the General Manager of the contractor, and the Maintenance Manager 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.

The Maintenance Manager will review the daily inspections and document the corrective actions taken as a result of any deficiencies identified by the operator. Daily inspection records will be retained for a minimum of two weeks. The Maintenance Manager 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.

16.6 Preventative Maintenance:

Preventative maintenance inspections are scheduled by mileage and hours projections. However, anytime a driver has a safety concern that vehicle shall be brought in immediately for service. 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.

Vehicles will be scheduled in "A", "B", "C", and "D" inspections. These will be performed 5,000 mile/250-hour intervals following the sequence: A, A, B, A, A, C, A, A, B, A, A, D as shown below:

Vehicle manufacturers and component suppliers provide service manuals containing detailed information for repair, maintenance, and recommended PM intervals. Recommendations provided in Original Equipment Manufacturers (OEM) service manuals assist our agency to formulate our maintenance procedures and PM intervals. These procedures are based on the OEM maintenance requirements for warranty and operating conditions.

All vehicles are inspected within 500 miles or 25 hours (10% variance) of the required PM interval to be on time. It is our goal that 95% of the vehicles shall be serviced on time.

The preventive maintenance inspection is a program of routine checks and procedures performed on a scheduled and recurring basis to avoid breakdowns and prolong equipment life.

- a. The "A" Inspection is performed every 5,000 miles or 250 hours. It is designed for the inspection of interior safety, convenience and comfort items; service and replacement of oil, fuel, water and air conditioning filters; inspection of exterior, lighting, sheet metal, ingress and egress; inspection of chassis, brakes and suspension; inspection of power plant, transmission and associated electronics. Any defects found will be noted on the Inspection form and all corrective action will be shown.
- b. The "B" Inspection is performed each 15,000 miles. This inspection repeats the "A" inspection and service items. Additionally, the engine air filter is replaced and the tires are rotated.
- c. The "C" Inspection is performed each 30,000 miles. This inspection repeats the "B" inspection and service items. Additionally, front wheel bearings and seals are repacked or replaced, air conditioning orifice tube is replaced, engine coolant is replaced and gasoline engine fuel filter is replaced.
- d. The "D" Inspection is performed each 60,000 miles. This inspection repeats the "C" inspection and service items. Additionally, transmission fluid and filter are replaced and rear differential fluid is replaced.
- e. A Preventive Maintenance Inspection form will be completed, signed and dated by the mechanic

- f. performing the work and will then be signed and dated by the supervisor. Any defects found during the routine inspection requiring specific repairs will require a Work Order to be completed. The completed inspection form and work order will then be filed in the corresponding vehicle file. All vehicle repairs should be completed within two weeks unless there are extenuating circumstances.

16.7 Bus Safety Inspections:

Safety inspections are part of the maintenance inspections and are performed at least once every year on all buses operated by Lake County Transit and contracted service providers. The Maintenance Manager is responsible for ensuring that each individual performing a bus safety inspection is qualified as follows:

- Understands the requirements set forth in FAC Rule 14-90 and can identify defective components.
- Is knowledgeable of and has mastered the methods, procedures, tools, and equipment used when performing an inspection.
- Has at least one year of training and/or experience as a mechanic or inspector in a vehicle maintenance program and has sufficient general knowledge of buses owned and operated by the bus transit system to recognize deficiencies or mechanical defects.

Although not required by Rule 14-90, agencies are encouraged to require Automotive Service Excellence (ASE) certifications of mechanics performing bus safety inspections.

Each bus receiving a safety inspection shall be checked for compliance with the requirements for safety devices and equipment as referenced or specified by FAC Rule 14-90. Specific operable equipment and devices as required by FAC Rule 14-90 include the following as applicable to Type I and II buses:

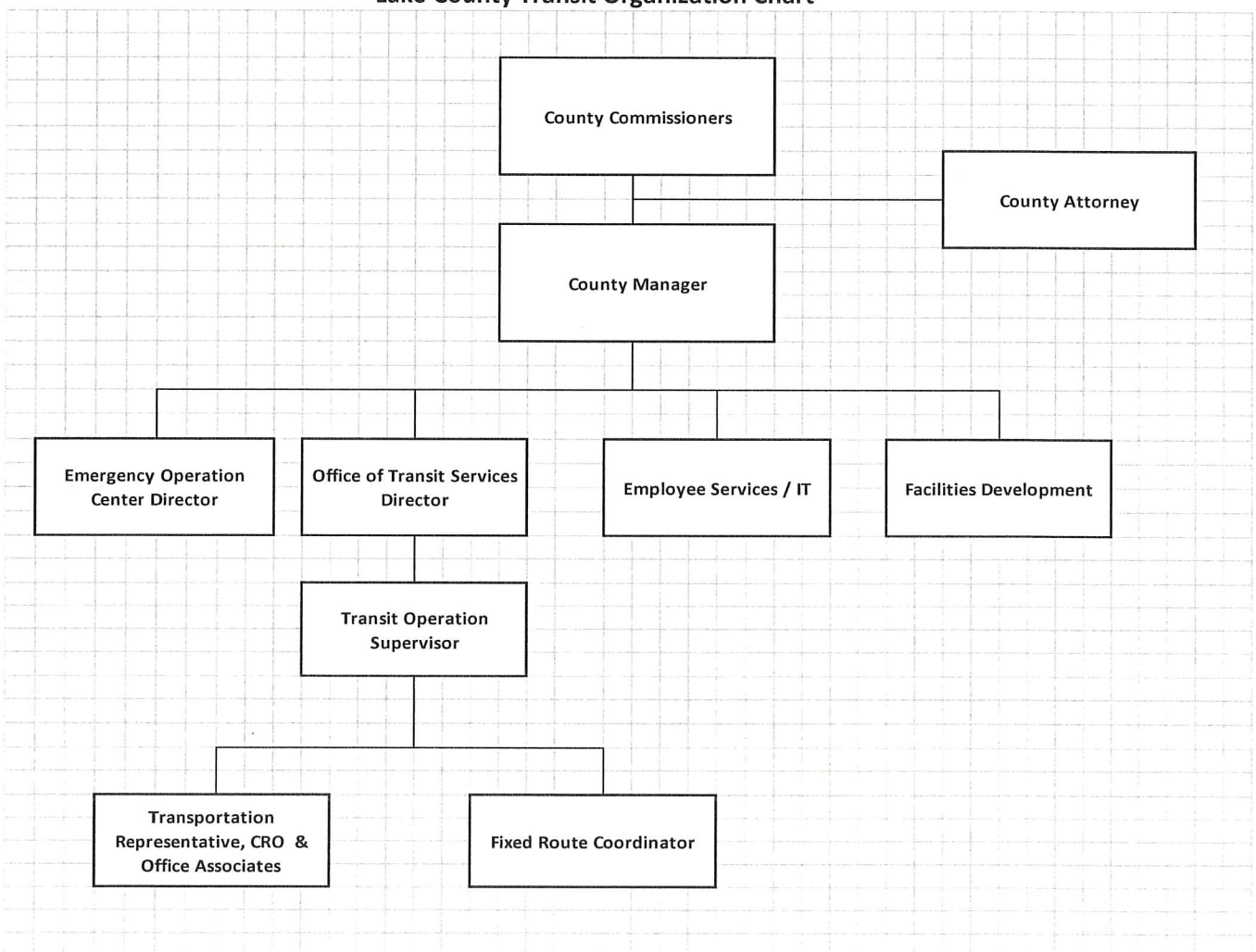
- Horn
- Windshield wipers
- Mirrors
- Wiring and batteries
- Service and parking brakes
- Warning devices
- Directional signals
- Hazard warning signals
- Lighting systems and signaling devices
- Handrails and stanchions
- Standee line and warning
- Doors and brake interlock devices
- Stepwells and flooring
- Emergency exits
- Tires and wheels
- Suspension system
- Steering system
- Exhaust system
- Seat belts
- Safety equipment
- Equipment for transporting wheelchairs
- Working speedometer
- A safety inspection report will be prepared by the individual(s) performing the inspection and will include the following:

- Identification of the individual(s) performing the inspection
- Identification of the bus transit system operating the bus
- The date of the inspection
- Identification of the bus inspected
- Identification of the equipment and devices inspected including the identification of equipment and devices found deficient or defective
- Identification of corrective action(s) for any deficient or defective items found and date(s) of completion of corrective action(s)

Records of annual safety inspections and documentation of any required corrective actions will be retained for a minimum of four years for compliance review.

Management has the overall responsibility of safe and secure operations of Lake County Transit and contract service operators. Each employee is required to carry out specific system safety responsibilities, depending on his/her position, in compliance with the SSPP. The organization information provided below describes each position and the reporting structure; the table in the following page shows system safety responsibilities of each position.

Lake County Transit Organization Chart



Note: The chart above only shows Lake County departments/staff involved with transportation.

RATP Dev Organization Chart

