

## *CORPORATE HISTORY*

1985 - CoachCrafters was incorporated in September 1985 under the name ABC Bus Manufacturing. The company was established to serve the public transportation industry.

1986 - The company completes its first major bus remanufacturing contract with City of Detroit. The company also entered into contracts with the Metropolitan Transit Commission in Minneapolis, Minnesota.

1988 - The company secures a contract with New York City to rebuild 100 RTS buses.

1990 - The company is sold to Wayne and Anne Wolf who change the name to CoachCrafters, Inc.

1998 - CoachCrafters Inc. moves corporate offices to Northfield, Minnesota and begins construction on a new 27,000 square foot repair facility.

1999 - CoachCrafters Inc. moves into their new facility, designed to accommodate all phases of coach repair, maintenance, remanufacture, rehabilitation and component retrofits.

2000 - CoachCrafters Inc. expands its service to include wheelchair installation and collision repair for motor coach operators.

2003 - CoachCrafters, Inc. opens a satellite facility near Orlando, Florida. The company now offers transit bus and motor coach sales and service at both locations.

2008 - The company expands its Florida operation and service center and closes the Minnesota service center.

# CORPORATE PROFILE

## GENERAL

- Created in 1985 to provide quality bus rebuilding and repair services nationwide
- Headquartered in Tavares, Florida just outside of Orlando since 2003
- Provides a wide variety of needed services to public and private agencies
- Dedicated to helping organizations maintain and enhance the value of their investment in transportation



## KEY SERVICES

- Offers full range of needed bus repair services
  - Collision and fire damage repair
  - Mechanical repairs
  - Frame repairs
  - Major component upgrades
  - Remanufacturing and Rehabilitation
- Upgrades transit buses and highway coaches for ADA-compliance
  - Repairs non-working lifts
  - Installs and retrofits new lifts
  - Upgrades passenger restraint systems
  - Installs P.A. systems
- Repairs or replaces broken or rusted bulkheads
- Replaces soft or broken floor boards
- Preventive maintenance
- Warranty repairs and administration
- Mini-rehab services
  - Repairs or replaces bulkheads
  - Replaces damaged floorboards
  - Performs necessary cosmetic repairs
  - Repairs axles and suspension system
- Used Bus Sales and Leasing
- Nationwide field services
- Consulting services

## COMMITMENT TO QUALITY

- Provides detailed estimates to insure accurate view of requirements and needs
- Commitment to honest and open approach to providing services and materials
- Offers flexible approach by allowing customer to supply parts, if desired
- Provides support and service on a nationwide basis

## **COMPANY QUALIFICATIONS**

Since its incorporation in 1985, CoachCrafters, Inc. has provided service to private and public transportation systems throughout the country. The goal of the company is to help both public and private agencies preserve and enhance the value of their buses through proper maintenance.

CoachCrafters, Inc.'s services include bus remanufacturing, bus maintenance and installation of a variety of upgrades including wheelchair lifts, seating, drive trains, air conditioning and electrical systems. Additionally, the company performs collision and fire damage repairs, sells and leases used vehicles, and provides warranty service for several bus and component manufacturers.

The company recently expanded its operation and service center in Tavares, Florida, located near Orlando and employs 20 skilled mechanics and service technicians and several support staff. Here, customers receive excellent service, innovative solutions, and affordable repairs.

Specific Experience CoachCrafters has with Heavy-Duty Transit buses and MotorCoaches:

### Running Repairs

- Air Conditioning
- Electrical
- Component replacement

### Collision and Fire Damage Repairs

- Structural Repairs or Replacement
- Frame Straightening
- Component system repairs or replacement

### Preventive Maintenance

- Fluids and adjustments
- Inspections & Fluid Analysis

### Warranty Administration

- Inspect and report failure covered by warranty
- Warranty claim processing

### System Retrofits

- Wheelchair Lifts & Restraint Systems
- HVAC Systems & Electrical Systems
- Drive Trains & Custom engineering projects

### Full Rehabilitation and Refurbishment

- Interior, Exterior, Structure and Frame, All Major Components

## ***RESUME OF ORGANIZATION TEAM***

**CoachCrafters, Inc. technical and operations team consists of the following individuals:**

***WAYNE WOLF***      ◆◆ President

Wayne brings many years of manufacturing experience to his current position. Wayne is a graduate of St. Cloud University with a Bachelor of Science degree and has an Industrial Relations certificate from the University of Minnesota. From 1979 to 1983, he was manager of personnel and training for a medium sized manufacturing company. Wayne joined CoachCrafters in 1983 as general manager of sales and service. In 1986 he was appointed vice president; in 1987 he was appointed to his current position as President.

***TOM QUAY***      ◆◆ Vice President

Tom has an Associate of Arts degree in Engineering Technology. Tom has over 25 years of experience in the bus rebuilding and repair industry. He began his experience as a repair technician with growing responsibility from mechanic to supervisor as well as in purchasing and warranty administration. Tom was appointed to vice president and general manager of CoachCrafters in 1988.

***ANNE WOLF***      ◆◆ Human Resource Manager

Anne has many years experience in Human Resources in both public and private sector settings. She received her Bachelor's degree from Bemidji State University and recently received a Masters Degree from the University of Saint Thomas.

***GEORGE DONZE***      ◆◆ Account Manager

As Regional Sales Manager, George Donze has brought with him many years of experience as a Marketing Consultant and in Sales. He began his career with CoachCrafters in December 2007.

## ***RESUME OF ORGANIZATION TEAM***

### **SERVICE CENTER:**

***ROBERT HASELEU*** ◆◆ Technical Services Account Manager

Robert has over 15 years of experience as a technician in the automotive and heavy truck industry, and is an ASE certified master mechanic. He decided to make a move to the bus industry in 2002 as a Lead Tech for a bus dealership. In June of 2004 he joined CoachCrafters, Inc. as shop manager at the Florida facility.

***JOHN DICKARD*** ◆◆ Shop Supervisor

John has attended numerous clinics on electronic and A/C systems. He is qualified in air brake systems, transmission, differentials, electrical, and in electronic engines. He served on Central Florida Safety Council for 15 years. John has brought his experience and knowledge to Coach Crafters in October of 2006.

***SAM MANNINO*** ◆◆ Paint & Body Shop Supervisor

Sam has been a body and paint tech since 1983. He has 30 years experience in the trade. Sam went to paint school and "I" car trained in all areas. He has been a collision tech for 25 years. In April of 2008, he joined CoachCrafters as Paint/body Shop Manager.

***MECHANICS*** ◆◆ Service Technicians

All Coach Crafters mechanics (service technicians) have both education and experience in bus repair, retrofits and complete remanufacturing. The Service Technicians also participate in on-going training designed to enhance their current skill levels. Coach Crafters Service Technicians possess certifications that include HVAC systems, D.O.T. inspections, brakes, diesel engines, and structural and non-structural paint and refinishing analysis and damage repair.

## **DESCRIPTION OF BIDDER'S MAINTENANCE FACILITY**

CoachCrafters operates a Bus Rebuilding facility in Tavares, FL. We have 24,000 sq. ft. under roof. Our facility includes a 60 ft. paint booth, a complete welding facility, 12 fully equipped mechanical bays with six sets of bus lifts. All work bays are supported with air, electrical, and a full compliment of shop equipment. Parts storage and management are housed in a 6000 sq. ft. building.

CoachCrafters has on average 900 hours available weekly. Many of our technicians are multi-skilled with at least two skill areas. CoachCrafters employee's 26 technicians including two ASE Master Technicians and four certified welders. Many of our technicians have a variety of ASE and other certifications and specialties needed in this refurbishment project.



# **COACH CRAFTERS INC.**

27530 County Road 561, Tavares, FL 32778

## Quality Assurance Plan

Coach Crafters will work your staff to develop a quality assurance plan designed specifically for your project. The plan will include general goals, documentation of all product and installation instructions, drawings, inspection forms, inventory control parts and labor identification thru job cost tracking

- I. Customer requirements
  - A. Technical specifications
  - B. Quality Criteria for deliverables
  - C. Define quality standards
  - D. Establish schedule requirements
- II. Inventory Management Plan
  - A. Identify Suppliers
  - B. Identify vendor delivery schedule
  - C. Determine "as required" inventory levels
  - D. Receive parts and enter into computer tracking system
- III. Testing
  - A. Perform QC tests on incoming inventory
  - B. Isolate failed parts from inventory
  - C. Secure parts after passing QC
  - D. Perform testing and inspections at work site.
  - E. Test equipment required for inspections
  - F. Prepare documentation for inspections and testing
- IV. Configuration Control Plan
  - A. Organization
    1. Responsibilities
    2. Facilities
    3. Tools
    4. Training
  - B. Change Control
    1. Change requests
    2. Control Authority
    3. Work Products
    4. Status records and reports

Ph 352-742-8111 800-334-2871 Fx 352-742-7311

[buses@coachcrafters.com](mailto:buses@coachcrafters.com) [www.coachcrafters.com](http://www.coachcrafters.com)

# **COACHCRAFTERS INC.**

450 ARMSTRONG ROAD  
NORTHFIELD, MN 55057

CUSTOMER: *Regional Transit System*  
City of Gainesville

PROJECT ID: RFP for Installation of Wheelchair Lifts on 20 Orion Buses  
RFP 000327-RTSX-RW

PURCHASE ORDER NUMBER: SCRTSX0008006

*CoachCrafters Inc.* has completed work per the above referenced project on the bus listed below:

## PROJECT COMPLETION:

CITY OF GAINESVILLE Bus No.

Date

\_\_\_\_\_

\_\_\_\_\_

RELEASED BY:  
*CoachCrafters Inc.* Representative

ACCEPTED BY:  
*Regional Transit System* Representative

\_\_\_\_\_

Print Name

\_\_\_\_\_

Print Name

\_\_\_\_\_

Signature

\_\_\_\_\_

Signature

s:\Wayne's Files\Gainesville\Gainesville-Project SignOff Form



Tel. 507-645-1640 • 800-334-2871  
Fax 507-645-2739  
[buses@coachcrafters.com](mailto:buses@coachcrafters.com)  
[www.coachcrafters.com](http://www.coachcrafters.com)

## CUSTOMER REFERENCES

Birmingham-Jefferson County Transit Authority  
1735 Morris Avenue  
PO Box 10212  
Birmingham, AL 35202-0212  
Sharon Sneed, Manager of Procurement  
(205) 521-0161

Broward County Transit  
3201 West Copans Road  
Pompano Beach, FL 33069  
Mike Trimm  
(954) 357-8444  
mtrimm@broward.org

City of Detroit, Department of Transportation  
1301 East Warren Avenue  
Detroit, MI 48207  
Karmun Newby, Purching/Contract Admin Div  
(313) 833-0262

Five Seasons Transportation & Parking  
427 NW 8th Avenue  
Cedar Rapids, IA 52405  
Bill Hoekstra, General Manager  
(319) 398-5367

Gainesville Regional Transit System  
100 SE 10th Avenue  
Gainesville, FL 32602  
Paul Starling, Maintenance Manager  
(352) 334-2611  
starlingpk@ci.gainesville.fl.us

HARTline  
4305 East 21st Avenue  
Tampa, FL 33605  
Ed Bart, GM of Facilities & Vehicle Maintenance  
(813) 623-5835 Ext. 1196

Kenosha Area Transit  
3735 65th Street  
Kenosha, WI 53142  
Craig Lambrecht, Supervisor of Maintenance  
(262) 653-4290  
tcraigl@kenosha.org

Laidlaw Transit Services, Inc.  
11550 Rupp Drive  
Burnsville, Minnesota 55337  
Ian Fleming, Maintenance Manager  
(952) 890-0200

Minnesota Valley Transit Authority  
11550 Rupp Drive  
Burnsville, MN 55337  
Michael Abegg, Planner  
(952) 882-7500  
mabegg@mvta.com

Montgomery Area Transit System  
2318 West Fairview Avenue  
Montgomery, AL 36108  
Howard Flint, Maintenance Manager  
(334) 240-4583

## CUSTOMER REFERENCES CONTINUED

Potomac & Rappahannock Transportation Commission  
14700 Potomac Mills Road  
Woodbridge, VA 22192  
Bill Leisen, Manager of Contract Operations  
(703) 580-6116  
bleisen@omniride.com

Roaring Fork Transportation Authority  
51 Service Center Road  
Aspen, CO 81611  
Kenny Osier, Director of Maintenance  
(970) 920-1905 Ext 209  
kosier@rfta.com

Rochester City Lines  
1825 North Broadway  
Rochester, MN 55904  
Dan Holter, General Manager  
(507) 288-4353  
dholter@rochestercitylines.com

SPORTRAN  
1115 Jack Wells Boulevard  
Shreveport, LA 71107  
Joe Watson, Director of Maintenance  
(318) 673-7400

University of Iowa, CAMBUS  
100 CAMBUS Office  
Iowa City, IA 52242-1000  
Brian McClatchey, Asst. Transit Director  
(319) 335-0381  
brian-mcclatchey@uiowa.edu

Walt Disney World Co.  
PO Box 10000  
Lake Buena Vista, FL 32830-1000  
Richard Cote, Director of Maintenance  
(407) 824-5948  
richard.cote@disney.com

Walt Disney World Co. - Trams  
5275 North Center Drive  
Lake Buena Vista, FL 32838  
Lou Berkheiser  
(352) 978-5595  
llewellyn.berkheiser@disney.com

# **COACH CRAFTERS INC.**

27530 County Road 561  
Tavares, Florida 32778

## **ACCIDENT, INJURY AND ILLNESS REDUCTION PROGRAM (AIIR)**

### **OBJECTIVE / GOALS**

#### **COMPANY POLICY STATEMENT**

CoachCrafters, Inc. is committed to providing a safe and healthy work environment for all of its employees. Our top management team will provide the commitment, leadership and resources necessary to create and maintain a safe work force. We expect our employees to actively participate in recognizing, promoting and practicing safe work habits.

### **OVERVIEW**

DATE OF IMPLEMENTATION: November 15, 2000

The goal of CoachCrafters' Accident, Injury and Illness Reduction Program (AIIR) is to assure, as far as possible, every employee a safe and healthy work environment and to preserve our human resources. Enforcement of and compliance to this program should facilitate the awareness, execution and maintenance of safe work practices.

Mr. Tom Quay is the appointed company safety officer. The company safety officer has full authority and responsibility for implementation, enforcement and maintenance of the AIIR.

The general guidelines of this program also apply to the following specialized programs:

- Employee Right-To-Know Program
- Respiratory Protection Program

### **EMPLOYER'S RESPONSIBILITY**

CoachCrafters will furnish to its employees conditions of employment that are free from recognized hazards that are causing or are likely to cause serious injury or death. Management is responsible to ensuring that the safety and health policies are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the policies fairly and uniformly as well as affecting the safety attitudes of others by behavior and action. CoachCrafters will provide the employees all necessary protective equipment required by OSHA standards at no cost to the employee.

### **EMPLOYEE'S RESPONSIBILITY**

All employees are responsible for following all policies and procedures and for assisting in maintaining a safe work environment. All employees are required to read, understand and comply with the contents and policies of the AIIR and applicable safety practices and procedures.

## **MANAGEMENT OF PLAN**

The assigned company safety officer will conduct, no less than annually, a full review of the AIIR Program to analyze accuracy, effectiveness, resources, etc.

### **POLICIES FOR CONDUCTING AND DOCUMENTING A REVIEW**

Management:

- Establish accountability measures for management and supervisors
- Evaluate the resources provided (money, training, materials, personnel)
- Evaluate demonstrated management commitment

Review all records and documentation for actions incurred since the date of last review

Review investigation reports of workplace accidents, illness and injury

Review documented corrective actions taken and any follow-up actions

Review enforcement of safe work practices and compliance

Based on the results of the review, necessary updates to the AIIR are to be made. Copies will be distributed to each employee and a copy will be posted on the central bulletin board in the lunchroom.

## **COMMUNICATIONS**

The following system of communications is designed to create a continuous flow of safety and health information between workers, supervisors and management:

- 1 - New hire orientation. Orientation will include a copy of the AIIR, review and discussion of the AIIR contents and policies, and where to obtain additional copies if necessary.
- 2 - Safety suggestion program. Workers are encouraged to inform management about existing or potential workplace hazards. Workers can directly report to management either verbally or through written correspondence. The company's Suggestion Box will act as an anonymous communication path.
- 3 - Managers and supervisors are responsible for implementing and maintaining current training on employees in their work areas. Meetings and training will be documented.
- 4 - Company safety meetings will be scheduled on a monthly basis. Open discussion will be encouraged. Presentations may be used to inform employees about recent findings regarding safety and health issues. Meeting/Presentation content and attendance will be documented.
- 5 - Safety information will be posted on or by the central bulletin board in the lunchroom. It is the responsibility of each employee to read and understand the posted information.

## **SAFETY AND HEALTH COMMITTEE**

The appointed Safety Committee will consist of one management person and no less than one worker from the Administration Department, one worker from the Parts Department, and two workers from the Service Department. Workers from the Service Department will be elected by fellow employees to represent them on the committee. The term of employee-elected members shall be a maximum of one year. Should a vacancy occur, a new member will be elected. A chair-person shall be elected by the Safety and Health Committee.

The purpose of the safety committee is to facilitate dialog, analysis and action on safety issues. Members will help in the detection and elimination of unsafe conditions and work procedures. The committee has the authority to make decisions, and its recommendations and plans will be supported by the company safety officer. Meetings are to be scheduled, as necessary, to ensure that an issue can be discussed and acted upon quickly and efficiently.

#### SCOPE OF SERVICES

- Conduct in-house safety inspections with appropriate supervisor
- Assist with accident investigation to uncover trends
- Review accident reports to determine means of elimination
- Accept and evaluate employee suggestions
- Review job procedures and recommend improvements
- Monitor the AIIR Program policies for effectiveness
- Promote and assist in maintaining a safe work environment

All meetings held by the Safety and Health Committee will be documented using the *Safety and Health Meeting – Safety Form CCI102*. A copy of the minutes will be provided to:

Wayne Wolf - President

Tom Quay - Vice President / Company Safety Officer

All Employees - Posted on central bulletin board in lunchroom

#### **SAFETY AND HEALTH TRAINING / INSTRUCTION**

All workers, including managers and supervisors, will have training and instruction on general and job specific safety and health practices.

Training and instruction will be provided as follows :

- 1 - AIIR Program orientation to all new company hires;
- 2 - To all employees given a new work assignment for which training has not previously been provided;
- 3- To all employees when new substances, equipment or procedures are introduced to the workplace and which might represent a hazard;
- 4- To new supervisors to familiarize them with hazards in their assigned area to which their worker's may be exposed, and train them in applicable safety and health matters;
- 5- Specialized training or retraining when needed.
- 6- At least annually, or when work conditions change

Training and instruction shall be documented on the *Safety and Health Training –Safety Form CCI103*.

#### **IMPLEMENTATION OF PROGRAM**

##### Initial Implementation

- Every employee will be given a copy of the AIIR. The contents, policies and procedures are to be reviewed and understood.
- Each employee will be required to provide signature as proof of receipt of program copy and understanding of the program.
- Those employees NOT in attendance will receive individual reviews

## **ACCIDENT, INJURY, ILLNESS, HAZARDOUS SUBSTANCE EXPOSURE INVESTIGATIONS AND CORRECTIVE ACTIONS**

All employees are responsible for reporting workplace accidents, illnesses, and exposures to the supervisor, manager or company safety office immediately. Employees who fail to report the afore mentioned, shall be disciplined as per the Disciplinary Action section.

The employee should report directly to their supervisor or other designated person who will act as principal investigator. All reportable accidents and illnesses will be fully investigated and documented. The supervisor will be familiar with OSHA rules for accident reporting and investigation.

CoachCrafters will maintain a file for all First Reports Of Injury. OSHA reportable workplace injuries and illnesses will be recorded using the OSHA 200 form. An annual summary using this form will be posted. This data will be used to review and analyze the effectiveness of the AIIR.

Procedure for Workplace Safety and Health Incident Investigations:

- 1- Visiting the accident scene as soon as possible;
- 2 - Interviewing the affected worker/workers and witnesses, and taking written statements;
- 3 - Examining the workplace for factors associated with the accident, illness or exposure;
- 4 - Determining the cause of the accident, illness or exposure;
- 5 - Taking corrective action to prevent the accident, illness or exposure from recurring, and;
- 6 - Documenting the findings and corrective actions taken. CoachCrafters Worker's Compensation carrier will be notified as necessary.
- 7 - Determine if any follow-up investigation or actions need to be taken. Document and schedule as necessary.

A qualified first-aid and medical services kit will be available in the Service Department by the Parts Room Door. The company safety office is responsible for maintaining the stock of this kit.

## **RECORD KEEPING / REPORTING**

CoachCrafters will observe the following record keeping and reporting guidelines to support the implementation and maintenance of our AIIR Program:

Records will be kept for a minimum period of 3 years for the following events:

- Documentation of safety and health training for each employee.  
*Safety and Health Training - Safety Form CCI103*
- Training meetings, safety committee meetings and presentations.  
*Safety and Health Meeting - Safety Form CCI102*
- Accident, illness and exposure Investigations including corrective actions and any follow-up actions.  
*Accident Investigation Report - Safety Form CCI105*
- First Report Of Injury forms - *MN Form 44503*. OSHA reportable workplace injuries and illnesses will be recorded using the *OSHA 200 form*.
- Hazard assessment inspections  
*Hazard Assessment Report - Safety Form ERTK301*
- Annual review of AIIR Program

## DISCIPLINARY ACTION

CoachCrafters requests the cooperation of all employees in efforts to familiarize themselves with all safety and operation procedures.

The safety rules and regulations cited will be strictly enforced and disciplinary measures will be taken as necessary. The extent of the discipline will be determined in accordance with the current CoachCrafters policies and practices.

Records of all disciplinary actions and warnings will be maintained both by the company safety officer and in the employee's personnel file.

## FOR EMPLOYEES - NOTIFICATION of UNSAFE CONDITION/S FORM CCI101

# HAZARD ASSESSMENT, CONTROL AND CORRECTION

## HAZARD ASSESSMENT

Inspections will be used to identify, analyze and control new or existing hazards, conditions and operations and will be based on the Facility Inspection Checklist, and past inspections and experiences. Inspections shall be performed by a competent person appointed by the company safety manager. Results shall be documented using the *Hazard Assessment Report - Safety Form ERTK301*.

Inspections shall be conducted according to the following guidelines:

### INITIAL INSPECTION

#### Implementation of AIIR Program

A full departmental and critical inspection shall be conducted to identify all hazardous substances, equipment, conditions and operations.

Each hazardous equipment, condition and operation identified will be documented and analyzed. Safety procedures and policies will be drafted for implementation and compliance.

Each hazardous substance identified will be dealt with according the Employee Right-To-Know Program (see section)

### SCHEDULED INSPECTIONS

- Monthly facility inspection to consist of:

Walk-thru of the facilities

Inspection of safety equipment

Inspection of tools

Inspection of all primary and secondary hazardous waste containers

Inspection of vehicles, equipment, fork lift, bus lifts

- Annual to be performed by the company safety committee:

All items from the monthly inspections

Review the record keeping and reporting data from:

Safety and Health Meeting Reports

Facility Inspection Reports

Hazard Assessment Reports

Accident, Injury, Illness, Exposure Investigation Reports

First Report Of Injury Reports

## WORKPLACE CHANGE INSPECTIONS

- Upon report of a previously unrecognized potential hazard  
Notice of Potential Unsafe Conditions - Safety Form CCI101 shall be used by any employee who notices an unsafe condition. The supervisor, manager or Safety and Health Committee will investigate and implement a corrective in a timely manner. Should the unsafe condition require a change in the AIIR, the company safety officer will work with the department manager or supervisor to ensure that corrective action is executed and updates to procedures are performed. A copy of final documentation will be forwarded to the company safety officer for file.
- When a new hazardous substances, equipment or procedures are introduced into the workplace.
- Whenever workplace conditions warrant an inspection.
- When workplace injuries or illnesses occur.
- When we hire or reassign employees to a process or operation for which a hazard evaluation has not been previously conducted.

## HAZARD CONTROL AND CORRECTION

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazard. Once detected or discovered, hazards shall be corrected and controlled according to the following procedures when observed or detected:

- 1 - ELIMINATE THE HAZARD  
Simple removal of a non-essential item or replacement with a non-hazardous item. No notification, training, follow-up or policy changes necessary.
- 2 - ENGINEERING CONTROLS  
Hazardous item is physically modified so as to render the item non-hazardous. Notification and training will be performed, and policies and procedures will be changed as necessary depending on how the change affects the workplace.
- 3 - ADMINISTRATIVE CONTROLS  
An employee's exposure will be limited to a pre-set, non-injurious number of hours per work day via job rotation or removing the employee from the hazard or hazardous area. Administrative controls will be closely monitored by the employee's supervisor or manager.
- 4 - PERSONAL PROTECTIVE EQUIPMENT  
Employees in the vicinity of and who are at risk to receive hazardous exposure to an item will be required to wear or use proper protective clothing/devices. Employees will be responsible for knowing, remembering and complying with the policies and procedures that require them to wear or use extra equipment. Protective eye wear will be worn at all times.

# **COACH CRAFTERS INC.**

To: All Employees of CoachCrafters, Inc.

From: Wayne Wolf, President

Subject: **Substance Abuse Policy and Drug Free Workplace Statement**  
Revised July 1, 2007

The CoachCrafters, Inc. Substance Abuse Policy was established in order to comply with the *Drug Free Workplace Act of 1988*, the *Omnibus Transportation Employee Testing Act of 1991*, and the *Federal Transit Administration (FTA) regulations*. This policy, originally written and distributed in March of 2001, has been updated and amended. All employees of CoachCrafters, Inc. are covered by this policy and should read it carefully. Additionally, training on it and the hazards of substance abuse will be provided to all employees of the company.

By providing a workplace that is free from the deleterious effects of alcohol and drug abuse, the company continues to commit itself to an environment that is safe for employees and fully able to maximize its focus on customer service excellence.

## **Drug Free Workplace Act Policy Statement**

CoachCrafters, Inc. requires that the workplace be drug-free. Therefore, following the terms of this policy is a condition of employment for all employees.

The Company is committed to providing a workplace that is safe and free from the constraints imposed by the use and abuse of alcohol and illegal drugs.

The unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited in the workplace.

Violations of this policy will result in immediate disciplinary action up to and including termination of employment.

The company will provide drug awareness training to all employees and will offer confidential information services for any employee who wishes additional information on alcohol or drug-related issues.



**CoachCrafters, Inc.**

**Substance Abuse Policy  
Contents**

**Section**

- A. Policy
- B. Purpose
- C. Applicability
- D. Definitions
- E. Legal Drugs
- F. Prohibitions
- G. Mandatory Testing
- H. Searches
- I. Testing Procedures
- J. Employee Requested Testing
- K. Pre-Employment Testing
- L. Reasonable Suspicion Testing
- M. Physical Effects of Alcohol
- N. Post-Accident Testing
- O. Random Testing
- P. Return To Duty Testing
- Q. Follow-Up Testing
- R. Return To Work Testing
- S. Dilute Specimen Policy
- T. Employment Assessment
- U. Re-Entry Agreements
- V. Refusal to Be Tested
- W. Penalties for Policy Violation
- X. Education and Training
- Y. Records Retention and Employee Access
- Z. Policy Changes and Amendments



# **COACHCRAFTERS INC.**

## **SUBSTANCE ABUSE POLICY**

The United States Department of Transportation, Federal Transit Administration (FTA), has published regulations requiring drug testing with the overall goal of ensuring a drug-free transportation environment and in turn, reducing accidents and casualties in motor carrier operations. It is well documented that the use of drugs, including alcohol and other controlled substances, represents a serious health risk to the user of the drug, as well as a safety hazard to the general public, particularly in the context of the use and operation of commercial motor vehicles.

### **A. Policy**

1. CoachCrafters, Inc. (also referred to as CCI or the Company throughout this document) is responsible for providing services to public transit agencies throughout the United States. Some of CCI's public agency customers require the company to employ a substance abuse policy and plan. In addition to this requirement, CoachCrafters, Inc. believes that a drug-free workplace will provide a healthy and satisfying work environment that promotes personal opportunities for growth. In meeting these goals, it is company policy to (1) ensure that employees are not impaired in their ability to perform assigned duties in a safe, productive and healthy manner, (2) create a workplace environment free from the adverse effects of drug abuse and alcohol misuse, (3) prohibit the unlawful manufacture, distribution, dispensing, possession or use of controlled substances and (4) to encourage employees to seek professional assistance anytime personal problems, including alcohol or drug abuse, adversely affect their ability to perform their assigned duties.
2. There is no place for drug use or the lingering effects of "off hours use" that can be tolerated in the work environment.
3. CCI's substance abuse policy was established in order to comply with the regulations that are mandated by the Federal Transit Administration and the Company.

### **B. Purpose**

The purpose of this policy is to assure worker fitness for duty and to protect employees, passengers and the public from the risks posed by the misuse of alcohol and use of prohibited drugs. This policy is also intended to comply with all applicable federal regulations governing workplace anti-drug and alcohol programs in the transit industry. The FTA has published 49 CFR Part 653 and Part 655, as amended, that mandate urine drug testing and breath alcohol testing for safety-sensitive positions and prohibits performance of safety-sensitive functions when there is a positive test result. FTA has also published 49 CFR part 40, as amended, that sets standards for the collection and

testing of urine and breath specimens. In addition, the federal government published 49 CFR Part 29, "The Drug-Free Workplace Act of 1998," which requires establishment of drug free workplace policies and the reporting of certain drug-related offenses to the FTA. This policy incorporates those requirements for safety-sensitive employees and others, when so noted. Italicized items indicate policy statements established by CoachCrafters, Inc. and apply to both sensitive and non-safety sensitive employees.

The FTA safety-sensitive categories are:

1. Revenue Vehicle Operations
2. Revenue Vehicle Maintenance & Equipment
3. Revenue Vehicle Control/Dispatch
4. CDL/Non-Revenue
5. Security Personnel who carry firearms

CoachCrafters, Inc.'s safety-sensitive positions are:

1. Shop Supervisor
2. Service Technician
3. D.O.T. Technician

### **C. Applicability**

This policy applies to *all* CoachCrafters, Inc. employees.

### **D. Definitions**

Where used in this policy statement, the following shall have the meaning set forth below:

1. Alcohol Positive Test - Any result performed by a certified Breath Alcohol Technician (BAT) using an Evidential Breath Tester (EBT) that indicates on the confirmation test a result of .02% Breath Alcohol Concentration (BAC).
2. Commercial Vehicle - Any self-propelled or towed vehicle used on public highways to transport passengers or property wherein the vehicle has a gross vehicle weight rating or gross combination weight rating of Twenty Six Thousand One (26,001) or more pounds, the vehicle is designed to transport more than sixteen (16) passengers, including the driver, or the vehicle is used in the transportation of hazardous materials in a quantity requiring Placarding regulations issued under the Hazardous Materials Transportation Act.
3. Controlled Substance - Any illegal drug or a prescription drug that has not been prescribed for the individual being tested for a condition under current treatment.
4. DER – Designated Employee Representative. At CoachCrafters, Inc., the DER shall be the individual(s) who are responsible for supervising the day-to-day shop operation. The DER(s) will be the Shop Supervisor and General Manager which are the positions that supervise and oversee the work performed by safety-sensitive employees.

The DER's are: *Tom Quay, General Manager*  
*CoachCrafters, Inc.*  
*27530 County Road 561*  
*Tavares FL*  
*352-742-8111 or 800-334-2871*  
*Cell: 612-860-0033*

*John Dickard, Shop Supervisor*  
*CoachCrafters, Inc.*  
*27530 County Road 561*  
*Tavares FL*  
*352-742-8111 or 800-334-2871*  
*Cell: 407-666-3705*

*Robert Haseleu, Shop Manager*  
*CoachCrafters, Inc.*  
*27530 County Road 561*  
*Tavares FL 32778*  
*352-742-8111 or 800-334-2871*  
*Cell: 352-536-0684*

*Sam Mannino, Shop Supervisor*  
*CoachCrafters, Inc.*  
*27530 County Road 561*  
*Tavares FL 32778*  
*352-742-8111 or 800-334-2871*  
*Cell: 352-242-7613*

5. Driver - is an employee who is required to hold a Commercial Drivers License to perform their duties.
6. Drug Positive Test - Any test result confirmed by a Department of Health and Human Services (DHHS) certified laboratory where the drug concentration is indicated to be greater than the DHHS cutoff level utilized by DOT.
7. Employee Subject to Testing - *Any individual employed with this company.*
8. MRO – Medical Review Officer - A licensed physician with detailed knowledge of substance abuse disorders and drug testing. It is his/her responsibility to interpret, verify and validate test results and determine whether there is a legitimate medical explanation for a confirmed positive test. CoachCrafters, Inc.'s MRO's are:

*Dr. John Cametas, Pembroke Occupational Health Clinic, 2307 North Parham Road, Richmond, Virginia 23229.*

*Dr. Arlene Palazzolo, 9815 South Orange Blossom Trail, Orlando, Florida 32837.*

9. Possession - Any prohibited or controlled substance secreted on company property.

10. Premises - Includes, but is not limited to, all property whether owned or leased or used by the Company. For the purposes of this policy, it also includes any other locations where CoachCrafters, Inc.'s employees are performing work on behalf of the Company.

11. Program Manager – Primary person given total responsibility for substance abuse program content and administrative compliance to the FTA regulations. The program manager is:

*Anne Wolf, Human Resource Manager  
CoachCrafters, Inc.  
27530 County Road 561  
Tavares FL 32778  
800-334-2871  
cell: 612-986-0932*

12. A safety-sensitive function - is any duty related to the safe operation of mass transit service including the operation of a revenue service vehicle whether or not the vehicle is in revenue service, dispatch and maintenance of a revenue service vehicle or equipment used in revenue service, security personnel who carry firearms and any other employees who are required to hold a Commercial Drivers License

13. Substance Abuse Professional (SAP) - Is a licensed or certified physician, psychologist, social worker, employee assistance professional or addiction counselor with knowledge or clinical experience in the diagnosis and treatment of drug and alcohol related disorders.

14. Under the influence - Any amount of controlled substance or alcohol detected in any specimen greater than the cutoff levels designated by the National Institute for Drug Abuse or established state or federal levels of impairment. \*A blood alcohol level of .02% BAC or greater.

## **E. Legal Drugs**

1. The appropriate use of legally prescribed drugs and legal non-prescription medication is not prohibited. However, the use of any substance which carries a warning label that indicates that mental functioning, motor skills or judgment may be adversely affected must be reported to a company manager and medical advice must be sought by the employee, as appropriate, before performing work-related duties.

2. A legally prescribed drug means that an individual has a prescription or other written approval from a physician for the use of a drug in the course of medical treatment. It must include the patient's name, the name of the substance, quantity/amount to be taken and the period of authorization. The misuse or abuse of legal drugs while performing company business is prohibited.

## **F. Prohibitions**

No employee shall:

1. While on duty, possess, or test positive as defined in this policy for any prohibited substance, narcotic drug, or any derivative thereof. In addition, no employee while on duty shall possess, be under the influence of, or use any other substance, to a degree that renders the employee incapable of safely performing their duties.
2. Consume an intoxicating beverage regardless of its alcoholic content, or be under the influence of an intoxicating beverage, within four (4) hours before going on duty, while on duty, or while operating or having physical control of a commercial vehicle.
3. Consume an intoxicating beverage regardless of its alcoholic content, be under the influence of an intoxicating beverage or have any measured alcohol concentration of .02% or greater.
4. Be on duty or operate a vehicle while in the possession of a controlled substance or an intoxicating beverage regardless of its alcoholic content.
5. Refuse to sign a consent or release form authorizing the collection of the specimen, analysis of the specimen and release of the results to the department.
6. Refuse to cooperate with the collection site personnel, department personnel or in any way refuse to provide a specimen when required.
7. Refuse to provide a specimen when required under this policy.
8. Fail to inform appropriate company officials of a reportable accident or insure that a FTA drug screen and alcohol test is performed as required by the regulations as soon as possible.
9. Use of alcohol or other prohibited substances within eight (8) hours of a reportable accident or until:
  - a. The employee has been drug and alcohol tested, or
  - b. The employee's conduct has been discounted as a contributing factor in the accident and will not be required to provide a specimen.

## **G. Mandatory Testing**

Mandatory Drug and Alcohol Testing

Employees shall submit to testing for the presence of a controlled substance and/or alcohol, and other drugs, upon request by the company. Means of testing shall include

urinalysis, evidential breath test, blood screens, saliva tests and such other tests, as the company may determine. Testing will be required:

1. As a condition of employment and prior to promotion to or placement in a safety-sensitive position, and
2. Where reasonable suspicion exists to suspect that an employee is under the influence of a prohibited substance, alcohol or other intoxicating beverage or substance, and
3. As soon as possible, but not later than eight (8) hours following an accident, if the driver receives a citation for a moving traffic violation arising from the accident. If the eight (8) hour time limit is exceeded or collection of an alcohol specimen is suspended, the drug specimen will be collected as soon as possible not to exceed thirty-two (32) hours after the accident. The driver is solely responsible for assuring the company that the required specimen is provided as soon as possible, and
4. As a part of random pool of all employees, and
5. As otherwise required by applicable law, regulations or department policy.

#### **H. Searches**

1. *Employees, while on company premises, are required to submit to searches of their vehicles, lunch boxes, lockers, personal effects, desks or similar repositories, etc. when management has a reasonable suspicion to believe that (1)the employee possess a prohibited substance or (2) the employee ingested a prohibited substance.*

#### **I. Testing Procedures**

1. The company affirms the need to protect individual dignity, privacy and confidentiality throughout the testing process.
2. Testing shall be conducted in a manner to assure the highest degree of accuracy and reliability and using techniques, equipment and laboratory facilities which have been approved by the U.S. Department of Health and Human Services (DHHS).

*The testing site is Ocoee Family Medical Center, 10872 West Colonial Drive, Ocoee, Florida 34761.*

*The testing laboratory is LabOne/Quest Diagnostics, 10101 Renner Boulevard, Lenexa, Kansas 66219.*

3. The FTA requires employees to be screened for Marijuana, Cocaine, Opiates, Amphetamines and Phencyclidine. An initial drug screen will be conducted on each urine specimen. For those specimens that are positive, a confirmatory Gas Chromatography/Mass Spectrometry test will be performed.

4. The random test for breath alcohol concentration will be conducted utilizing National Highway Traffic Safety Administration (NHTSA) approved equipment operated by a trained BAT. If the initial random test results indicate an alcohol concentration of .02% or greater, a second test will be performed to confirm the results of the initial test.
5. Shy Bladder Evaluation - The term “shy bladder”, as used in this policy statement, refers to any condition (physical or psychological) in which the employee claims that he/she is unable to pass a sufficient specimen.

If the donor employee has not provided the 45 ml specimen after 3 hours, the collector dismisses the donor and immediately notifies the company’s DER by phone to inform him/her of the situation. The collector then allows the donor to speak directly to the DER who suspends the donor from work. At this time, the DER sets an appointment with the donor in the DER’s office as soon as possible.

The collector then (within 24 hours) faxes a copy of the chain of custody form directly to the MRO. The form must include specific information related to the fact that the donor had been given a three-hour opportunity to generate a specimen.

The purpose of the DER’s meeting with the donor is to explain to the employee that he or she must have an evaluation to determine whether their inability to produce an adequate specimen is based on a medical or psychological problem.

a. The DER will give the employee the information needed for the employee to set up an appointment for an evaluation with a licensed physician who has expertise in the medical issues raised by the employee’s failure to provide a sufficient specimen. This may be with a licensed physician who has previous experience with the employee and has diagnostic information related to the employee’s condition. Or, it can be with a specialist such as a nephrologist or urologist who is able to diagnose reasons for a shy bladder result.

b. The evaluation must be completed within 5 days of the documented shy bladder episode.

c. As soon as the DER is notified of the appointment, he/she is to notify the MRO of the consulting expert licensed physician’s name, address, phone number, and fax number, so that the MRO can send him/her a detailed instruction letter and a reply form in which he/she checks the appropriate box, writes an optional one sentence opinion explanation, signs his/her name and faxes it back to the MRO.

d. The consulting physician must recommend to the MRO one of the following:

- i. That the employee has or has a high probability of having a medical condition that precludes them from providing a sufficient amount of urine. A medical condition includes an ascertainable physiological condition (e.g., a urinary system

- dysfunction) or a medically documented pre-existing psychological disorder, but does not include unsupported assertions of “situational anxiety” or dehydration.
- ii. There is not an adequate basis for determining that a medical condition has, or with a high degree of probability could have, precluded the employee from providing a sufficient amount of urine.
- e. Upon completing the evaluation, the consulting physician must provide a written statement to the MRO of the recommendation on the employee’s medical condition beyond what is necessary to explain their conclusion.
  - f. In the case of a pre-employment test, if the consulting physician determines that the employee’s medical condition is a serious and permanent or long-term disability that is highly likely to prevent the employee from providing a sufficient amount of urine for a very long or indefinite period of time, they must set forth this determination and the reasons for it in the written statement to the MRO.
  - g. Upon receipt of the licensed physician’s letter, the MRO will decide if a condition exists which, with a high degree of likelihood could have prevented the employee from passing a sufficient urine specimen. If so, the MRO cancels the test. If such a condition is not proven to exist, the MRO reports “Refusal to Test”. An employee determined to have Refused to Test will be treated as positive specimen, removed from duty, disciplined in accordance with CoachCrafters, Inc. work rules and referred to the SAP.
  - h. When this inability to provide a sufficient specimen occurs for Pre-Employment, Return-To-Duty, or Follow-Up testing, where a Negative result is imperative, due to a permanent or long term condition (such as dialysis or chronic renal insufficiency), the MRO must require a consultation with an acceptable physician to determine if there is clinical evidence of illicit drug use. The consultation may result in the recommendation of an alternative test (blood or hair) as part of the evaluation.

Alternative test methods mentioned above cannot be used in Random drug testing situations. The employee must undergo a “shy bladder evaluation” as described above. If the donor employee proves to have a precluding medical condition, the MRO will cancel the test and allow the employee to remain in the random pool.

- i. Occasionally, the MRO may call the consulting physician for further clarification, before making the final decision.

## **J. Employee Requested Testing**

Any safety-sensitive or non-safety-sensitive employee who questions the results of a required drug test may request that an additional test be conducted. This test must be conducted at a different testing DHHS certified laboratory. The test must be conducted on the split sample that was provided by the employee at the time the original sample was collected. The employee pays all costs for such testing unless the result of the split sample test invalidates the results of the original test. The method of collecting, storing and testing the split sample will be consistent with the procedures set forth in 49 CFR Part 40, as amended. The employee's request for a split sample test must be made to the Medical Review Officer (MRO) within seventy-two (72) hours of notice that the original sample was positive for a controlled substance. Requests after seventy-two (72) hours will only be accepted if the delay was due to documentable facts that were beyond the control of the employee.

## **K. Pre-Employment Testing**

All safety-sensitive *and non-safety-sensitive* position applicants shall undergo urine drug testing and breath alcohol testing as a condition of employment and/or prior to performing safety-sensitive work or prior to transferring or a promotion/demotion into a safety-sensitive position. Failure to successfully complete a drug or alcohol test will disqualify an applicant for employment for a period of one hundred twenty (120) days. Evidence of the absence of drug or alcohol dependency from a SAP that meets with the approval of the department and negative drug and alcohol tests will be required prior to further consideration for employment. The cost for the assessment and any subsequent treatment will be the sole responsibility of the individual.

## **L. Reasonable Suspicion Testing**

All safety-sensitive and *non-safety-sensitive* employees may be subject to a fitness for duty evaluation, and urine and/or breath testing when there are reasons to believe that drug or alcohol use is adversely affecting job performance. A reasonable suspicion referral for testing will be made by trained supervisors on the basis of documented objective facts and circumstances which are consistent with the short-term effects of substance abuse. Examples of reasonable suspicion include, but are not limited to:

1. Physical signs and symptoms consistent with prohibited substance use, i.e., slurred speech, unsteady gait, confusion or dilated pupils, etc.
2. Evidence of the manufacture, distribution, dispensing, possession or use of controlled substances, drugs, alcohol or other prohibited substances, i.e., any drug paraphernalia, alcohol container, or observed drug related activities.
3. Occurrence of a serious or potentially serious accident that may have been caused by prohibited substance abuse or alcohol misuse.
4. Fights (to mean physical contact), assaults and flagrant disregard or violations of established safety, security or other operating procedures.

5. Reasonable suspicion referrals must be made by a supervisor who is trained to detect the signs and symptoms of drug and alcohol use and who reasonably concludes that an employee may be adversely affected or impaired in their work performance due to possible prohibited substance abuse or misuse.

#### **M. Physical Effects of Alcohol**

Some of the physical effects of alcohol are impaired judgment, reduced reaction time and impeded vision. Other signs are lack of control, personality changes and lack of coordination.

#### **N. Post-Accident Testing**

1. All safety-sensitive employees will be required to undergo urine and breath testing if they are involved in an accident with a company vehicle (regardless of whether or not the vehicle is in revenue service) which results in a fatality. This includes all surviving safety-sensitive employees who could have contributed to the accident. In addition, a post accident test will be conducted if the employee receives a citation under state or local law for a moving traffic violation arising from an accident. If no citation is given, the Company's safety-sensitive employees may still be tested if they could have contributed to the accident.

2. Following an accident, the safety-sensitive employee will be tested as soon as possible, but not to exceed eight (8) hours for alcohol testing and thirty-two (32) hours for drug testing. Any safety-sensitive employee involved in an accident must refrain from alcohol use for eight (8) hours following the accident or until they undergo a post-accident alcohol test. Any safety-sensitive employee who leaves the scene of the accident without justifiable explanation prior to submission to drug and alcohol testing will be considered to have refused the test and their employment terminated. Employees tested under this provision will include not only the operations personnel, but any other covered employees whose performance could have contributed to the accident.

#### **O. Random Testing**

Employees in safety-sensitive positions will be subject to random, unannounced testing. The selection of employees for random alcohol testing will be made using a scientifically valid method that ensures each covered employee that they will have an equal chance of being selected each time selections are made. The random tests will be announced and spread throughout the year.

Each year, a minimum of 25% of the Company's safety-sensitive employees will be randomly tested for drugs and a minimum of 10% will be tested for alcohol.

#### **P. Return to Duty Testing**

All safety-sensitive *and non-safety-sensitive* employees who previously tested positive on a drug or alcohol test must test negative and be evaluated and released to duty by the SAP before returning to work.

## **Q. Follow Up Testing**

Safety-sensitive *and non-safety-sensitive* employees will be required to undergo frequent unannounced urine and/or breath testing following their return to duty. The follow-up testing will be performed for a period of twelve (12) months to sixty (60) months with a minimum of six (6) tests to be performed the first year.

## **R. Return-to-Work Testing**

This testing is required for all safety-sensitive employees who are returning to work after an absence of sixty (60) days or more.

## **S. Dilute Specimen Policy**

1. DILUTE/POSITIVE: If the Medical Review Officer (MRO) reports a specimen as Positive/Dilute the test will be dealt with as a positive test. No additional test will be administered.
2. DILUTE/NEGATIVE: If the Medical Review Officer (MRO) reports a specimen as Negative/Dilute the test will be dealt with as a negative test. No additional test will be administered.

## **T. Employment Assessment**

1. Any safety-sensitive *or non-safety-sensitive* employee who tests positive for the presence of illegal drugs or alcohol above the minimum thresholds set Part 40, as amended, will be terminated and referred for evaluation by SAP.
2. Consistent with current practices, the SAP will evaluate the employee to determine what assistance, if any, the employee needs in resolving problems associated with prohibited drug use or alcohol misuse.
3. Assessment by a SAP does not shield an employee from disciplinary action or guarantee employment or reinstatement with the company.
4. If a safety-sensitive or non-safety-sensitive employee is allowed to return to duty, they must properly follow the rehabilitation program prescribed by the SAP, the employee must have negative return to duty drug and alcohol test and be subject to unannounced follow-up tests for a period of twelve (12) months to sixty (60) months. The cost of any treatment or rehabilitation services will be paid directly by the employee or their insurance provider.

## **U. Re-Entry Agreements**

An employee who wishes to re-enter the workforce and is rehired by the company, must pass CCI criteria and agree to a re-entry contract. That contract will include (but is not limited to):

1. A release to work statement from the SAP.

2. A negative test for drugs and/or alcohol.
3. An agreement to unannounced frequent follow-up testing for a period of twelve (12) months to sixty (60) months with at least six (6) tests performed the first year.
4. A statement of expected work related behaviors.
5. An agreement to follow specified after care requirements with the understanding that violation of the reentry agreement is grounds for termination.
6. Any violation of the terms of this agreement will result in termination. An arbitrator shall be without authority to alter the penalty imposed.
7. *Prior to this document being drawn up and signed the employee must obtain permission to do so from the Company.*

## **V. Refusal To Be tested**

If an employee refuses to be tested, he or she will be subject to termination. **The following actions constitute a refusal to be tested by a safety-sensitive or non-safety sensitive employee:**

1. Failure to appear for any test within a reasonable time, as determined by the Company, after being directed to do so by the Company.
2. Failure to remain at the testing site until the testing process is complete;
3. Failure to provide a urine or breath specimen for any drug or alcohol test required by DOT or FTA regulations;
4. In the case of a directly observed or monitored collection in a drug test, failure to permit the observation or monitoring of your provision of a specimen;
5. Failure to provide a sufficient amount of urine or breath when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure;
6. Failure or decline to take a second test the Company or collector has directed you to take;
7. Failure to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process as part of the "shy bladder" procedures; or
8. Failure to cooperate with any part of the testing process (e.g., refusal to empty pockets when so directed by the collector, behaving in a confrontational way that disrupts the collection process) or verbal or written refusal to provide a required urine specimen.

9. Failure to refrain from consuming alcohol within eight (8) hours following involvement in an accident without first having submitted to post accident/drug/alcohol tests.
10. Failure to remain at the scene of an accident prior to submission to drug/alcohol tests without a legitimate explanation.
11. Providing false information in connection with a drug test, or if verified to have falsified test results through adulteration, or substitution of a urine specimen.
12. Failure or refusal to sign Step 2 of the Alcohol Testing Form.

## **W. Penalties for Policy Violation**

The consequence of violating the drug use and testing requirements contained in this policy and mandated by the FTA is an immediate 30-day suspension pending termination. This will be imposed when an employee:

1. tests positive for drugs
2. has a breath alcohol test with an alcohol concentration of 0.04% or greater
3. refuses to test or in any way obstructs the drug or alcohol testing process
4. does not notify the Department of any criminal drug statute within five(5) days after such conviction
5. is in a supervisory or managerial position and does not use and apply all aspects of this policy in an unbiased and impartial manner
6. engages in the unlawful manufacture, distribution, possession or use of prohibited substances on company property or in transit vehicles, in uniform, or while on company business
7. is in a situation where substance abuse criminal activity is suspected.
8. an employee who has a confirmed alcohol concentration of 0.02% but less than 0.04% will immediately be suspended for 30 days and re-tested before being allowed to return to work.

## **X. Education and Training Programs**

The company will provide this policy to each new employee. Additionally, the policy will be reviewed with the employee as part of the new employee orientation process.

Each employee will also receive one hour of training on the effects and consequences of prohibited drug use on the work environment. The training will also include information on the signs and symptoms of drug abuse.

Each supervisor and manager who makes reasonable suspicion determinations will receive an additional two hours of training on the physical, behavioral, and other performance indicators of drug and alcohol abuse.

## **Y. Records Retention and Employee Access**

For purposes of confidentiality, records are maintained and stored in a secure and locked file cabinet and are stored apart from employee personnel records. The location of the file cabinet is in the office of the Substance Abuse Program Manager.

An employee is entitled, upon written request, to obtain copies of any records related to their use of prohibited drugs or alcohol, including any records pertaining to his or her drug or alcohol tests. The requested records will be provided to the requesting employee within two business days at no cost to the employee.

Records will also be made available when required by law, such as court orders and subpoenas.

All program-related reports and records will be submitted by Company officials to FTA administrators upon their request.

## **Z. Policy Changes and Amendments**

This policy can be amended at any time in order to comply with FTA changes and/or Company program changes.