



Kokomo Howard County Governmental Coordinating Council
219 E. Sycamore St.
Kokomo, IN 46901

Phone: 765-456-2336
Fax: 765-459-9184

E-mail: tcorn@kokomompo.com
Web Site: www.kokomompo.com

April 29, 2026

This is to advise you of the next meeting of the Kokomo Howard County Governmental Coordinating Council's Policy Board on Thursday, May 7, 2026, at 2:00 p.m. The meeting will be in the Louks Conference Room located on the first floor of City Hall.

AGENDA

1. Call to Order by Presiding Chairman
2. Introduction of Guests
- *3. Approval of Minutes for Regular Meeting
4. Update on Fixed Route Shuttle Bus and Senior Bus Systems
5. Update on TIP/Resolutions/Administrative Modifications/Amendments
 - A. Resolution 2026-08 – Transfer of Funds
 - B. Resolution 2026-09 – State Projects
 - *C. Resolution 2026-10 – Update Project Funding for the 2026-2030 TIP
 - D. Resolution 2026-11 – Flexing of Funds to FTA
 - *E. Resolution 2025-12 – Approve the City of Kokomo Transit Department's Updated Public Transportation Agency Safety Plan (PTASP)
- *6. Approval of Surveillance/Traffic Count Agreement with the City of Kokomo
7. Project Status
8. Other Business
9. Public Comment
10. Next Regular meeting suggested date **July 23, 2026**
11. Motion to Adjourn

* Vote required

* <u>Board Member, Title</u>	<u>Appointment Authority</u>	<u>Term</u>
* Tyler Moore, Mayor	City of Kokomo	1/1/20 – N/A ²
* Jack Dodd, President	Howard County Commissioners	1/1/25 – N/A ²
* Greg Davis, President	Kokomo Common Council	1/1/26 - N/A ²
* Daryl Maple, President	Howard County Council	1/1/25 – N/A ²
* Martha Lake, Member	Howard County Council	1/1/24 – N/A ²
* Robert Stephenson, Member	Kokomo Common Council	1/1/24 – N/A ²
* Greg Sheline, Executive Director	Kokomo/Howard County Plan Commission	1/1/10 - N/A ²
* Michael Besser, President	Kokomo Plan Commission	1/1/10 – N/A ¹
* Cheryl Graham, President	Howard County Plan Commission	1/1/22 – N/A ¹
* Valerie Cockrum, Deputy Director	Greenfield District, INDOT	1/1/24 – N/A ¹
* Amy Groff, Representative	INDOT	10/1/20 – N/A ¹
* Erica Tait, Representative	Federal Highway Administration	1/25 – N/A ¹

N/A¹ serves until replaced by Appointing Authority

N/A² membership determined by KHCGCC linked to specific position/title within bylaws

Mandatory disclosure requirements for appointed officers per House Enrolled Act 1509 (IC-5-14-9)

MINUTES OF THE MEETING OF THE POLICY BOARD OF THE
KOKOMO AND HOWARD COUNTY GOVERNMENTAL
COORDINATING COUNCIL HELD THURSDAY, MARCH 12, 2026,
IN THE LOUKS CONFERENCE ROOM, CITY HALL

POLICY BOARD VOTING MEMBERS PRESENT

Greg Davis - President, City of Kokomo Common Council
Jack Dodd - President, Howard County Board of Commissioners
Cheryl Graham - President, Howard County Plan Commission
Martha Lake - Member, Howard County Council, Opposing Party
Tyler Moore - Mayor, City of Kokomo
Daryl Maple - President, Howard County Council
Greg Sheline - Executive Director, Kokomo/Howard County Joint Plan Commission

POLICY BOARD VOTING MEMBERS ABSENT

Mike Besser - President, Kokomo Plan Commission
Valerie Cockrum – Deputy Commissioner, Greenfield District, INDOT
Bob Stephenson - Member, Kokomo Common Council, in lieu of Opposing Party

POLICY BOARD NON-VOTING MEMBERS PRESENT

Amy Groff – Representative, INDOT (via telephone)

POLICY BOARD NON-VOTING MEMBERS ABSENT

La’Keshia Stewart – Representative, FHWA

OTHERS PRESENT

Kim Bowdell – Planner, KHCGCC
Tammy Corn - Executive Director, KHCGCC
Emily – Kokomo Tribune
Kaitlynn Myers – Kokomo Tribune
Yoanna Landrum

ITEM #1 ----- CALL TO ORDER

Chairman Moore called the meeting to order at 2:03 p.m.

ITEM #2 ----- INTRODUCTION OF GUESTS

Chairman Moore stated the next item of business is Introduction of Guests. Introductions were made for the benefit of guests, including Kaitlynn & Emily from the Kokomo Tribunes, and Yoanna Landrum.

ITEM #3 ----- ELECTION OF OFFICERS FOR CY2026

Chairman Moore stated the next item of business is Election of Officers for 2026. Chairman Moore opened the floor for nominations of Chairman. Mr. Sheline nominated Mayor Moore as Chairman. Mr. Dodd seconded. Mr. Sheline made a motion to close the nominations. Ms. Graham seconded. All in favor, none opposed. Mayor Moore is elected Chairman.

Chairman Moore opened the floor for nominations of Vice-Chairman. Mr. Sheline nominated Commissioner Dodd as Vice-Chairman. Ms. Graham seconded. Mr. Davis made a motion to close the nominations. Ms. Lake seconded. All in favor, none opposed. Commissioner Dodd is elected Vice-Chairman.

Chairman Moore opened the floor for nominations of Secretary/Treasurer. Ms. Graham nominated Mr. Sheline as Secretary/Treasurer. Ms. Lake seconded. Ms. Graham made a motion to close the nominations. Ms. Lake seconded. All in favor, none opposed. Mr. Sheline is elected Secretary/Treasurer.

ITEM #4 ----- APPROVAL OF MINUTES FOR REGULAR MEETING

Chairman Moore stated the next item of business is Approval of Minutes for Regular Meeting of November 25, 2025. Ms. Graham moved for the approval of the minutes as presented. Mr. Sheline seconded. All in favor, none opposed. Minutes are approved as presented.

ITEM #5 --- UPDATE ON FIXED ROUTE SHUTTLE BUS AND SENIOR BUS SYSTEMS

Chairman Moore said the next item of business is Update on Fixed Route Shuttle Bus and Senior Bus Systems. Mrs. Corn said Spirit of Kokomo and Fixed Route numbers are as follows:

2025/2026 Trip Comparison by Month and Mode				
Spirit of Kokomo (paratransit)				
Month	2025	2026	Change	% Change
January	6,782	5,978	-804	-13.45
February	6,534	6,612	78	1.18
March	7,023		-7,023	#DIV/0!
1st Qtr.	20,339	12,590	-7,749	-61.55

City Line Trolley (fixed route)				
Month	2025	2026	Change	% Change
January	19,842	26,101	6,259	23.98
February	19,530	20,332	802	3.94
March	22,023		-22,023	#DIV/0!
1st Qtr.	61,395	46,433	-14,962	-32.22

Mrs. Corn said weather played a huge part in Spirit of Kokomo and City Line Trolley rides declining. Numbers are already beginning to increase. Mr. Besser noted that March numbers were not yet included and will increase the total for the quarter.

Chairman Moore said a study to potentially expand the route and add additional stops is still under review. The goal is to keep the route loop within the one-hour time frame.

Ms. Graham said she has been referring many people to the “How Do I Get There” app which now shows where trolleys are located and how to get to them. Ms. Graham said this has been of great benefit to (United Way) clients.

Mr. Dodd asked if more consideration has been given to adding shelters at existing stops. Mrs. Corn said Jenson Pickett from Central Garage has been working with the Rotary Club to sponsor a shelter at Park LaFountain. As for additional shelters, they are now more than double the price at about \$12,000 per shelter. There is an existing list of potential sites, but all will need to meet certain requirements since federal dollars will be utilized.

ITEM #6 - - - - - UPDATE ON TIP/RESOLUTIONS/MODIFICATIONS/AMENDMENTS

Chairman Moore stated the next item of business is Update on TIP/Resolutions/Modifications/Amendments. Mrs. Corn said **Resolution 2025-25** is a modification to the current TIP as follows, and no vote is required:

RESOLUTION 2025-25

State Projects:

**DES 2200583 -Bridge Replacement Concrete - SR26-Bridge over M Fork Wildcat Creek
Total Project Cost increased from \$8,239,000 to \$8,274,000 - Amendment.**

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
RW	STBG	80/20	\$7,600	\$1,900	\$9,500	2026 - NEW

Mrs. Corn said **Resolution 2025-26** is a modification to the current TIP as follows, and no vote is required:

RESOLUTION 2025-26

State Projects:

**DES 2300752 -Bridge Replacement – SR931 NB over Kokomo Creek, 02.55 mi. N. SR 26
Total Project Cost decreased from \$7,363,000 to \$6,597,000**

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
CN	NHPP	80/20	\$5,890,502	\$1,472,626	\$7,363,000	2028 - current
CN	NHPP	80/20	\$2,550,000	\$638,000	\$3,188,000	2028 – NEW

**DES 2300753 --Bridge Replacement – SR931 SB over Kokomo Creek, 02.55 mi. N. SR 26
Total Project Cost decreased from \$7,363,000 to \$6,597,000**

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
CN	STBG	80/20	\$2,892,088	\$723,022	\$3,615,110	2028 - current
CN	NHPP	80/20	\$2,552,000	\$637,000	\$3,189,000	2028 - NEW

Mrs. Corn said **Resolution 2026-01** is a modification to the current TIP as follows, and no vote is required:

RESOLUTION 2026-01

State Projects:

**DES 2200003 -Signing Installation and Repair – Various locations in Greenfield District.
Total Project Cost increased from \$9,810,000 to \$12,821,000**

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
CN	STBG	80/20	\$5,365,198	\$1,341,300	\$6,706,000	2027 - current
CN	STBG	80/20	\$1,824,000	\$456,000	\$2,280,000	2027 – NEW

**DES 2401194 --Bridge Painting – US 35 bridge over WSR RR, OLD US 35 NB, 02.18 mi N SR 931
Total Project Cost \$644,000**

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
PE	NHS	80/20	\$41,000	\$10,000	\$51,000	2027 - NEW
CN	NHS	80/20	\$400,000	\$100,000	\$500,000	2029 - NEW

Mrs. Corn said **Resolution 2026-02** is a modification to the current TIP as follows, and no vote is required:

RESOLUTION 2026-02

Countywide Bridge Inspections:

DES 2300121 -Bridge Inspection and Inventory FY 27-30

Phase	Funding	Percent	Federal	Local	Total	Fiscal Year
PE	STBG	80/20	\$139,000	\$35,000	\$174,000	2027 - Old
PE	STBG	80/20	\$138,516.40	\$34,629.10	\$173,145.50	2027 – NEW
PE	STBG	80/20	\$13,000	\$3,000	\$16,000	2028 - Old
PE	STBG	80/20	\$12,757.36	\$3,189.34	\$15,946.70	2028 – NEW
PE	STBG	80/20	\$98,000	\$25,000	\$123,000	2029 - Old
PE	STBG	80/20	\$98,139.36	\$24,534.84	\$122,674.20	2029 – NEW
PE	STBG	80/20	\$12,000	\$3,000	\$15,000	2030 - Old
PE	STBG	80/20	\$11,876.48	\$2,969.12	\$14,845.60	2030 – NEW

Mrs. Corn said **Resolution 2026-03** is a modification to the current TIP as follows, and no vote is required:

RESOLUTION 2026-03

State Projects:

DES 2200583 -Bridge Replacement Concrete – SR 26 Over M Fork Wildcat Creek. Total Project Cost \$3,352,000

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
RW	STBG	80/20	\$7,600	\$1,900	\$9,500	2026 - current
RW	STBG	80/20	\$8,800	\$2,200	\$11,000	2026 – NEW

DES 2301177 – Small Structures & Drain Construction – US 35 Various locations in Delaware, Cass & Howard Counties. Total Project Cost increased from \$9,272,000 to \$10,418,000.

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
PE	STBG	80/20	\$631,587	\$157,897	\$789,000	2026 - current
PE	STBG	80/20	\$1,549,000	\$387,000	\$1,936,000	2026 - NEW

New State Projects:

DES 2301232 – Raised Pavement Markings, Refurbished– Various Locations in Greenfield District Total Project Cost \$700,000.

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
CN	HSIP	90/10	\$630,000	\$70,000	\$700,000	2028 – NEW

DES 2600077 – Access Control – Various locations in Greenfield District. Total Project Cost \$2,187,000.

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
PE	STBG	80/20	\$345,000	\$86,000	\$431,000	2026 – NEW

Mrs. Corn said **Resolution 2026-04** is an amendment to SFY 2026-2030 TIP and 2026-2030 STIP as follows:

RESOLUTION 2026-04

DES 2300586 -Bridge#30 on CR250S over Little Wildcat Creek – Rehabilitation - Total project cost was \$2,667,494 now \$2,792,484

Phase	Funding	Percent	Federal	Local	Total	Fiscal Year
RW	STBG	80/20	\$100,000	\$25,000	\$125,000	2027- new
CN	STBG	80/20	\$1,600,000	\$400,000	\$2,000,000	2027- current
CN	STBG	80/20	\$1,600,000	\$400,000	\$2,000,000	2028- new
CE	STBG	80/20	\$295,595	\$73,889	\$369,494	2027- current
CE	STBG	80/20	\$295,595	\$73,889	\$369,494	2028- new

DES 2002563 – Smith Road (300N) from CR 50E to Touby Pike– Road Reconstruction Total project \$7,043,580

Phase	Funding	Percent	Federal	Local	Total	Fiscal Year
CN	STBG	04/96	\$230,000	\$5,426,158	\$5,656,158	2027 – current
CN	STBG	04/96	\$230,000	\$5,426,158	\$5,656,158	2028 – new
CN	Relinquishment	0/100	\$0.00	\$60,263	\$60,263	2027 – current
CN	Relinquishment	0/100	\$0.00	\$60,263	\$60,263	2028 – new
CE	STBG/HSIP	0/100	\$0.00	\$600,000	\$600,000	2027 – current
CE	STBG/HSIP	0/100	\$0.00	\$600,000	\$600,000	2028 – new

Mr. Sheline made a motion to approve Resolution 2026-04. Seconded by Ms. Graham. All in favor; none opposed. Motion carried.

Mrs. Corn said **Resolution 2026-05** is a modification to the current TIP as follows, and no vote is required.

RESOLUTION 2026-05

State Projects:

DES 2400601 - Lighting Installation / Maintenance - Partial Interchange Lighting Replacement at various Interchanges. Total Project Cost was \$3,417,209 now \$3,460,000

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
CN	HSIP	90/10	\$3,057,488	\$339,721	\$3,397,209	2028 - current
CN	HSIP	90/10	\$3,058,000	\$340,000	\$3,398,000	2028 – NEW
PE	HSIP	90/10	\$38,000	\$4,000	\$42,000	2026 - NEW

DES 2300741 – Scour Protection– SR 22 Bridge over WILDCAT CREEK, 01.60 mi E SR 29 Total Project Cost \$1,408,000.

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
CN	STBG	80/20	\$671,388	\$167,834	\$839,000	2028 - current
CN	STBG	80/20	\$348,000	\$86,000	\$434,000	2028 – NEW

DES 23000743 – Scour Protection SR 26 SR 26 Bridge over W FORK LTL WILDCAT CR, 01.49 mi W SR 931 Total Project Cost increased from \$1,047,543 to \$1,408,000.

Phase	Funding	Percent	Federal	State	Total	Fiscal Year
CN	STBG	80/20	\$241,639	\$60,410	\$302,049	2028 - current
CN	STBG	80/20	\$248,000	\$62,000	\$310,000	2028 - NEW

Mrs. Corn said **Resolution 2026-06** adopts the first year of the 2-year Unified Planning Work Program (UPWP) for SFY 2027 as follows:

RESOLUTION 2026-06

WHEREAS, the Kokomo and Howard County Governmental Coordinating Council (KHCGCC) is the designated Metropolitan Planning Organization, responsible for transportation planning in the Kokomo and Howard County area; and

WHEREAS, development of an annual Unified Planning Work Program (UPWP), describing the KHCGCC’s projects using U.S. Department of Transportation funding is a requirement; and

WHEREAS, staff has developed the first year of a two-year plan, 2027 UPWP beginning July 1, 2026; and

WHEREAS, the Technical Advisory Committee of the Kokomo and Howard County Governmental Coordinating Council has given the Unified Planning Work Program (UPWP) a favorable recommendation.

Ms. Graham made a motion to approve Resolution 2026-06. Seconded by Mr. Maple. All in favor; none opposed.

ITEM #7 - - - - - CONFLICT OF INTEREST POLICY

Chairman Moore stated the next item of business is Conflict of Interest Policy. Chairman Moore asked members to sign the document for MPO office records.

ITEM #8 - - - - - PROJECT STATUS

Chairman Moore stated the next item of business is Project Status. Mrs. Corn provided updates on the following County projects:

- Bridge 56, located on 300 East just south of Sycamore Street – This project is complete pending the final walk-through with the consultant.
- Bridge 46, located in Cassville – This is in design phase and on schedule.
- Bridge 30, located on Alto Road – Right-of-way contracts are being finalized. This project is moving from 2027 to 2028 due to right-of-way.
- County-wide Bridge Inspections – The next inspection contract with the State will begin in November 2026.
- Haynes bridge on Defenbaugh – Although this is not a county project, the bridge construction is complete. However, the road work has been paused until asphalt is available. This area should reopen in April 2026. Chairman Moore said unfortunately another issue has come up in that the bridge was supposed to be raised 8-10 inches but was somehow raised 5 feet. This may cause an issue with the residential property to the west and is currently being reviewed.

As requested in this meeting, Mrs. Bowdell will send out a map of all bridge locations to Policy Board members.

Mrs. Corn provided updates on the following City projects:

- Smith Road – Due to uncertainty of future development, this project has now been moved out until 2028.
- Goyer Road – This project let and came in \$1 million more than anticipated at \$7,000,387. Mrs. Corn explained that the MPO had loaned \$300,000 to MCCOG (Anderson/Madison County Council of Governments) which they are now unable to use and will be pulled back.

Additionally, we will borrow \$890,000 from them, and all funds will be put towards this project. Mrs. Corn said all funds will be repaid in 2027.

- Berkley Road – Right-of-way contracts are needed on 38 parcels, and currently there is only \$100,000 set aside for right-of-way. An additional \$290,000 will be moved to this project by the next meeting.
- Center Road – This project is now in the design process.
- Alto Road – This project is now in the design process.

ITEM #9 -----OTHER BUSINESS

Chairman Moore stated the next item of business is Other Business. Mrs. Corn said **Resolution 2026-07** allows funds to be pulled back and borrowed from the Anderson MPO as follows:

RESOLUTION 2026-07

WHEREAS, the KHCGCC MPO staff have prepared a modification to the SFY 2026–2030 Transportation Improvement Program (TIP) to reflect an exchange of Surface Transportation Block Grant (STBG) funds between the Kokomo/Howard County Governmental Coordinating Council (KHCGCC) and the Madison County Council of Governments (MCCOG); and

WHEREAS, the modification reflects a previously approved transfer of **\$300,000 in STBG funds** from MCCOG to KHCGCC, originally scheduled for repayment in **FY 2027**, which MCCOG will instead return to KHCGCC in **FY 2026**; and

WHEREAS, MCCOG will also transfer **\$890,000 in STBG funds in FY 2026** to KHCGCC, and KHCGCC will return **\$890,000 in STBG funds to MCCOG in FY 2027** as part of the agreed exchange of federal funds; and

WHEREAS, MPO staff recommend that this amendment be incorporated into the **SFY 2026–2030 Transportation Improvement Program (TIP)** and submitted for inclusion in the **Indiana Statewide Transportation Improvement Program (STIP)**.

NOW, THEREFORE, BE IT RESOLVED that the Kokomo/Howard County Governmental Coordinating Council hereby approves the amendment to the **SFY 2026–2030 Transportation Improvement Program (TIP)** reflecting the following funding transfers:

Transfer	Funding Source	Federal Amount	Fiscal Year
MCCOG → KHCGCC	STBG	\$300,000	FY 2026
MCCOG → KHCGCC	STBG	\$890,000	FY 2026
KHCGCC → MCCOG	STBG	\$890,000	FY 2027

Mr. Sheline made a motion to approve Resolution 2026-07. Seconded by Ms. Lake. All in favor; none opposed. Motion carried.

Mrs. Corn said the budget change reflects an increase of funds that were not obligated when the original budget was approved. The increase of \$108,000 will be put towards health insurance and studies. Mrs. Corn said this does not increase the match funds from either the city or county. Mr. Sheline made a motion to approve the reappropriated 2026 budget. Seconded by Mr. Maple. All in favor; none opposed. Motion carried.

ITEM #10 -----PUBLIC COMMENT

Chairman Moore stated the next item of business is Public Comment. There is no public comment.

ITEM #11 -----NEXT REGULAR MEETING DATE

Mr. Moore said the next Regular Meeting is scheduled for May 7, 2026.

ITEM #12 -----MOTION TO ADJOURN

Chairman Moore stated the next item of business is Motion to Adjourn. Ms. Graham moved for adjournment. Ms. Lake seconded. All in favor; none opposed. Motion carried.

Presiding Chairman

Secretary/Treasurer

DRAFT

**AGREEMENT BETWEEN THE KOKOMO AND HOWARD COUNTY
GOVERNMENTAL COORDINATING COUNCIL AND THE CITY OF
KOKOMO FOR THE USE OF METROPOLITAN PLANNING FUNDS (PL
FUNDS) IN FISCAL YEARS 2027-2031 FOR TRAFFIC COUNTS**

THIS AGREEMENT (“Agreement”) is entered into by and between the **Kokomo and Howard County Governmental Coordinating Council** (“COUNCIL”) and the **City of Kokomo** (“CITY”).

This five-year Agreement shall be effective July 1, 2026 for State Fiscal Years (SFY) 2027 through June 30, 2031, unless terminated earlier as provided herein.

Either party may terminate this Agreement by providing written notice to the other party prior to the beginning of a State fiscal year.

WHEREAS, the COUNCIL is the designated Metropolitan Planning Organization (MPO) responsible for transportation planning activities within the Kokomo urbanized area in accordance with 23 U.S.C. §134 and 23 CFR Part 450; and

WHEREAS, the COUNCIL receives Federal Metropolitan Planning (PL) funds authorized under 23 U.S.C. §104(d) and administered pursuant to 23 CFR Part 420; and

WHEREAS, the CITY has previously agreed to collect traffic count data to support the KHCGCC Transportation Model and related metropolitan transportation planning activities; and

WHEREAS, the COUNCIL desires to continue such services utilizing PL funds for eligible planning activities;

NOW, THEREFORE, in consideration of the mutual covenants herein contained, the parties agree as follows:

1. PURPOSE AND SCOPE OF WORK

1.1 Purpose

The purpose of this Agreement is to provide for the collection of designated traffic count data to support the KHCGCC Transportation Model and other eligible metropolitan transportation planning activities as defined under 23 U.S.C. §134 and 23 CFR Part 420.

1.2 Eligible Activities

All activities performed under this Agreement shall:

- Be consistent with the COUNCIL’s adopted Unified Planning Work Program (UPWP) and;

- Constitute eligible metropolitan transportation planning activities under federal law; and
- Comply with all applicable federal and state requirements governing PL funds.

2. FUNDING

2.1 Federal Participation

The COUNCIL shall make available to the CITY federal Metropolitan Planning (PL) funds in an amount not to exceed **Five Thousand One Hundred Dollars (\$5,100.00)** for eligible activities performed under this Agreement.

Federal participation shall not exceed **eighty percent (80%)** of total eligible project costs.

2.2 Local Match Requirement

The CITY shall provide a minimum **twenty percent (20%) non-federal match**, which may consist of local funds and/or allowable in-kind contributions in accordance with 2 CFR §200.306.

All matching funds must:

- Be verifiable from the CITY's records;
- Not be included as contributions for any other federally assisted project;
- Be necessary and reasonable for accomplishment of project objectives; and
- Be allowable under 2 CFR Part 200.

2.3 Reimbursement

PL funds shall be provided on a reimbursement basis. The CITY shall submit documentation of eligible costs incurred, including appropriate supporting documentation, prior to reimbursement.

3. FEDERAL COMPLIANCE REQUIREMENTS

The CITY agrees to comply with all applicable federal statutes, regulations, executive orders, and guidance, including but not limited to:

- 23 U.S.C. §104 and §134
- 23 CFR Part 420 (Metropolitan Planning Funds)
- 23 CFR Part 450 (Metropolitan Transportation Planning)
- 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)
- Title VI of the Civil Rights Act of 1964
- Americans with Disabilities Act (ADA)
- Disadvantaged Business Enterprise (DBE) requirements, if applicable
- All applicable U.S. DOT and Federal Highway Administration (FHWA) requirements

Failure to comply with applicable federal requirements may result in suspension or termination of funding.

4. PROCUREMENT STANDARDS

If the CITY utilizes third-party contractors for any portion of the work, such procurement shall:

- Be conducted in accordance with 2 CFR §§200.317–200.327;
- Include full and open competition;
- Incorporate all required federal contract provisions; and
- Be documented and retained for audit purposes.

5. RECORDS AND AUDIT

5.1 Record Retention

The CITY shall maintain all financial records, supporting documentation, statistical records, and other records pertinent to this Agreement for a period of at least three (3) years from the date of final reimbursement, or longer if required by law or pending audit.

5.2 Audit Requirements

If applicable, the CITY shall comply with the Single Audit requirements of 2 CFR Part 200, Subpart F.

The COUNCIL, the Indiana Department of Transportation (INDOT), FHWA, and the U.S. Department of Transportation shall have access to all records for purposes of inspection and audit.

6. REPORTING

The CITY shall provide progress reports and documentation as required by the COUNCIL to ensure compliance with the approved UPWP and federal reporting requirements.

7. TERM AND TERMINATION

The termination date for work covered under this Agreement shall be **June 30, 2031**.

Any work initiated but not completed by this date must be included in a subsequent agreement covering State Fiscal Year 2027 or later to remain eligible for continued PL funding.

Either party may terminate this Agreement by written notice prior to the start of a State fiscal year. In the event of termination, the CITY shall be reimbursed only for eligible costs incurred prior to the effective date of termination.

8. INDEMNIFICATION AND LIABILITY

Each party shall be responsible for the acts and omissions of its officers, employees, and agents in accordance with applicable Indiana law. Nothing in this Agreement shall be construed as a waiver of governmental immunity.

9. NONDISCRIMINATION

The CITY agrees that no person shall, on the grounds of race, color, national origin, sex, age, disability, income status, or limited English proficiency, be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity funded under this Agreement.

10. AMENDMENTS

This Agreement may be amended only by written instrument executed by authorized representatives of both parties.

11. BINDING EFFECT

To the extent authorized by law, this Agreement shall be binding upon and inure to the benefit of the parties, their successors, and permitted assigns.

IN WITNESS WHEREOF, the parties have executed this Agreement by their duly authorized representatives.

CITY


KHCGCC POLICY BOARD

DATED: April 15, 2026

DATED: _____, 2026

City of Kokomo Board of Public Works and Safety


Kokomo and Howard County Governmental Coordinating Council

BY 
Weston Reed, President

BY _____
Presiding Chairman

BY _____
~~Sarah Spencer, Member~~

BY _____
Member

BY 
Thomas P. Rethlake, Member

ATTEST:

ATTEST:


Secretary, Board of Works and Safety

Member KHCGCC Policy Board

Comprehensive Agency Safety Plan Referred to as (PTASP)

Spirit of Kokomo and City Line Trolley



Adopted July 8, 2021

Prepared by: Tammy Corn, Executive Director
Leigha Hedrick, Transit Manager

Updated June 15, 2022

By: Christine Winger, Transit Supervisor

Adopted June 29, 2022

Updated April 14, 2023

By: Christine Winger, Transit Supervisor

Adopted: 5/24/2023

Updated June 12, 2024

By: Christine Winger, Transit Supervisor

Adopted: 7/11/2024

Updated: 4/16/2025

By: Christine Winger, Transit Supervisor

Adopted: 5/14/2025

Updated: 4/27/2026

By: Leigha Melton, Transit Manager

Adopted:

Table of Contents

Section 1. Transit Agency Information.....	5
General Information	5
Section 2. Plan Development, Approval, and Updates	6
Section 3. Safety Performance Targets.....	7-8
Section 4. Safety Management Policy.....	9-11
Safety Management Policy Statement	9-11
Safety Management Policy Communication.....	12
Authorities, Accountabilities, and Responsibilities.....	12
Accountable Executive (AE):	12-13
Chief Safety Officer (CSO)	13
Roll of Staff to Develop and Manage Safety Management Systems (SMS).....	13
Accountable Executive	13
Chief Safety Officer (CSO)	13
Supervisors.....	14
Employees.....	14
Key Staff	14
Employee Safety Reporting Program (ESRP)	14
Immediate Action Required	16
Delayed Action Required	16
Role of Supervisor	16
SOK/CLT Responsibility	16-17
Section 5. Safety Risk Management.....	17-18
Safety Hazard Identification.....	17
Personnel	19
Assets	19
System.....	19
Hazard Identification Procedure	20-21
Safety Risk Assessment	20-21
Safety Risk Mitigation	21
Section 6. Safety Performance Monitoring and Measurement.....	22

Maintenance	22
Maintenance Standards and Procedures.....	22
Operator Inspections	22
Daily Servicing and Inspections.....	22
Mileage-Based Maintenance Inspections.....	23
Maintenance Inspections of Contracted Providers	23
Operations	23
Infectious Disease Risk Management	23-24
Facility Monitoring	24
Frequency.....	25
Reporting.....	25
Hazard Resolution	25
Follow-up	25
Documentation	25
Employee Hazard Reporting	25
Loss Reports	25
Route/Operations Safety	26
Safety Events.....	26
Accident and Incident Reporting Process	26
Notification	26
At-Scene Procedures.....	26
Investigation.....	27
Hazard Resolution	27
Follow-up	27
Internal Reporting.....	27
Documentation	27
Performance Measures.....	27
Maintenance (<i>examples</i>)	28
Operations	28
Safety	28-29
7. Safety Promotion	30
Operator Selection.....	30
Hiring Practices	30

Training	31
Initial Bus Operator Training	31-32
Bi-Annual Training For All Bus Operators	32-33
Initial Operation Supervisor Training	33
Injury and Illness Prevention Training.....	33-34
Emergency Response Planning and Coordination	34
Safety Management System (SMS) Training.....	34
System Modification Design Review and Approval	35
General Process	35
Modification Design Review	35
Modification Design Approval.....	36
Monitoring	36
Documentation	36
Routes	36
Additional Information.....	37
Front-line Employee Involvement.....	37
Definitions of Terms Used in the Safety Plan.....	38-40
Commonly Used Acronyms.....	40
Appendix 1 (Hazard Report Form)	41
Board Approval Resolution.....	42
Signed Safety Management Policy Statement.....	43-45
Signed Approval Page.....	46

Section 1. Transit Agency Information

General Information

Spirit of Kokomo/City-Line Trolley

Accountable Executive (COK Transit Director): Jan Basil

Chief Safety Officer (COK Transit Supervisor): Christine Winger

219 E Sycamore St.

Kokomo, IN 46901 (765)456-2078

www.cityofkokomo.org

Modes of Service: City-Line Trolley (Fixed Service MB/DO) and Spirit of Kokomo (Para-transit DR/DO)

FTA Funding Sources: FTA Section 5307

Modes of Service Directly Provided:

- Fixed Route Bus Intercity Bus Bus Rapid Transit
 Demand Response Complimentary Paratransit

City of Kokomo does not provide transit services on behalf of another transit agency or entity.

City of Kokomo provides transit service on behalf of the following transit agency(s) or entity(s)

Funding Provided by: 5307, Public Mass Transit Funds (PMTF) and City of Kokomo General Fund.

This Plan is developed and updated in cooperation with frontline employee representatives in accordance with 49 CFR part 673.

Section 2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	City of Kokomo (COK) Transit System		
Signature by the Accountable Executive (COK Operations Coordinator)	Signature of Accountable Executive	Date of Signature	
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval	
	City of Kokomo Board of Public Works & Safety		
	Relevant Documentation (title and location)		
	Approved Board of Public Works & Safety Memo (insert date)		
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification	
	KHCGCC		
	Relevant Documentation (title and location)		
	Resolution 2026-12 Dated:5/07/2026		
Version Number and Updates			
<i>Record the complete history of successive versions of this plan.</i>			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
Updated annually	Section 3	Updated statistics to 2025 information.	
6-15-22	All applicable sections	Exclusion of Safety Committee Requirement in accordance with Bipartisan Infrastructure Law changes to 49 USC 5329(d).	
6-15-22	Section 6	Inclusion of Infectious Disease Risk Management language in accordance with Bipartisan Infrastructure Law changes to 49 USC 5329(d)	
6-15-22	Section 7	Updated training guidelines to include use of TAPTCO Training and Human Trafficking Training.	
Updated annually	Safety Management Policy Statement	Renewed signature & date.	
Updated annually	KHCGCC Resolution	Replaced with resolution approving current update.	
Updated annually	Approval page	Replaced with signatures and dates approving current update.	
4-14-2023	Section 1	Added funding sources in accordance with FTA Checklist Version 3	9-2022

Annual Review and Update of the Public Transportation Agency Safety Plan

The annual review of the PTASP will take place by June 1 of each year. If any changes are made, it will be signed by the Accountable Executive then forwarded to the Board of Public Works and Safety for approval by July 15th of the same year.

Section 3. Safety Performance Targets

Safety Performance Targets (based on 2025 data)

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

Mode of Transit Service	Fatalities (total)	Fatalities (per 100k VRM)	Injuries (total)	Injuries (per 100k VRM)	Safety Events (Total)	Safety Events (per 100k VRM)	System Reliability (VRM/failures)
Fixed Route Bus	0	0	0	0	0	0	168,642
Demand Response	0	0	0	0	0	0	334,342

Performance Measures:

- ◆ SAFETY PERFORMANCE MEASURE: FATALITIES (total number of reportable fatalities and rate per total vehicle revenue miles by mode)
 - Customers, employees and the public
 - DR/DO: 0 fatalities MB/DO: 0 fatalities
 - DR/DO: 334,342 VRM MB/DO: 168,642 VRM
 - Rate: DR/DO 0 fatalities per 100k VRM MB/DO 0 fatalities per 100k VRM
- ◆ SAFETY PERFORMANCE MEASURE: INJURIES (total number of reportable injuries and rate per total vehicle revenue miles by mode)
 - Customers, employees and the public
 - DR/DO: 0 injury MB/DO: 0 injury
 - DR/DO: 334,342 VRM MB/DO: 168,642 VRM
 - Rate: DR/DO injuries per 100k VRM MB/DO 0 injuries per 100k VRM
- ◆ SAFETY PERFORMANCE MEASURE: SAFETY EVENTS (total number of reportable events and rate per total vehicle revenue miles by mode)
 - Combined above with reportable incidents for customers, employees and the public
 - DR/DO: 0 safety event MB/DO: 0 safety event
 - DR/DO: 334,342 VRM MB/DO: 168,642 VRM
 - Rate: DR/DO 0 injuries per 100k VRM MB/DO 0 injuries per 100k VRM
 - Safety incident vs. other incidents:
Safety incidents include: collisions, fires, derailments, hazardous material spills and Acts of God. Other Incidents include events that do not fall into any other

categories, yet meet a reporting threshold other than immediate transport for medical attention for one person.

- ◆ SAFETY PERFORMANCE MEASURE: SYSTEM RELIABILITY (mean distance between major mechanical failures by mode)
 - Relationship with TAM Plan – State of Good Repair (SGR) by mode
 - State of Good Repair is defined as maintaining capital assets to a condition sufficient for the asset to operate at a full level of performance.
 - The City of Kokomo will strive to exceed INDOT and FHWA target measures for safety performance and system reliability.
 - Referenced in TAM pages 2-3.
 - Annual System Reliability: DR/DO: 334,342 VRM MB/DO: 168,642 VRM
 - DR/DO: 334,342 VRM MB/DO: 168,642 VRM
 - Major mechanical failure by mode

<u>DR/DO</u>	<u>MB/DO</u>
7/28/2025	12/15/2025
 - Major mechanical failure definition - Failures caused by vehicle malfunctions or subpar vehicle conditions which requires it be pulled from service and includes:
 - Towed from service.
 - Estimated property damage equal to or exceeding \$25,000.
 - Greater than 10 business days out of service.

Safety Performance Target Coordination		
<i>Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.</i>		
City of Kokomo (COK) shares safety performance targets with Kokomo Howard County Governmental Coordinating Council (KHCGCC) annually as part of our continued coordination of transit data. This data also includes Transit Asset Management Plan updates and anticipated capital replacement schedules. COK coordinates, to the maximum extent practicable, with the State and MPO in the selection of State and MPO safety performance targets.		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Indiana Department of Transportation (INDOT)	11/06/2025
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Kokomo Howard County Governmental Coordinating Council (KHCGCC)	11/06/2025

Section 4. Safety Management Policy

Safety Management Policy Statement

Spirit of Kokomo/City-Line Trolley (SOK/CLT) strives to provide safe, reliable, comfortable, and innovative transportation options to every member of the community. The Public Transportation Agency Safety Plan (PTASP) has been developed to integrate safety into all SOK/CLT system operations. By using the procedures contained in the PTASP, SOK/CLT can continue to improve the safety and security of SOK/CLT's operation and services.

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

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

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

SOK/CLT's commitment is to:

- **Support** the management of safety through the provision of appropriate resources that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- **Integrate** the management of safety among the primary responsibilities of all managers and employees;
- **Clearly define** for all staff, managers, and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of SOK/CLT's safety management system;
- **Establish and operate** hazard identification and analysis, and safety risk evaluation activities--including an employee safety reporting program as a fundamental source for safety concerns and hazard identification--to eliminate or mitigate the safety risks of the

consequences of hazards resulting from SOK/CLT operations or activities to a point which is consistent with an acceptable level of safety performance;

- **Ensure** that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;
- **Comply** with, 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** safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- **Continually improve** safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and
- **Ensure** externally supplied systems and services to support operations are delivered, meeting established safety performance standards.

SOK/CLT's Goals for Safety are established as follows:

- The City of Kokomo, in collaboration with the KHGCC, will design, construct, test, and operate a transportation system that achieves an optimum level of safety, meeting or exceeding the safety performance of other transit systems of a similar size in the United States.
- Identify and evaluate, then eliminate or control hazards to employees, customers, and the public.
- Meet or exceed all government and industry occupational health and safety standards and practices.
- Maximize the safety of future operations by affecting the design and procurement processes.

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

- Integrate safety management and hazard control practices within each SOK/CLT department. All SOK/CLT driver will participate in the 66 hours of Transit & Paratransit TAPTCO training programs annually.

- SOK/CLT drivers and office staff to complete “Human Trafficking” training annually.
- Assign responsibilities for developing, updating, complying with, and enforcing safety policies, procedures, and requirements.
- Verify compliance with SOK/CLT safety policies, procedures, and requirements through bi-annual performance evaluations, accident/incident trends, and internal audits.
- Assure investigation of all accidents/incidents, including identifying and documenting the causes for the purpose of implementing corrective action to prevent a recurrence.
- Increase investigation and systematic documentation of near misses.
- Identify, analyze and resolve safety hazards in a timely manner.
- Minimize system modifications during the operational phase by establishing and utilizing safety controls at system design and procurement phases.
- Ensure that system modifications do not create new hazards.
- Train employees and supervisors on the safety components of their job functions.

City of Kokomo takes these commitments seriously as the lives of SOK/CLT riders, employees and the general public depend on SOK/CLT’s ability to operate in a culture of safety.

The Agency Safety Plan addresses all applicable requirements and standards as set forth in FTA’s Public Transportation Safety Program and the National Public Transportation Safety Plan.

Accountable Executive

Date

**SIGNED COPY INCLUDED AT END OF DOCUMENT
WITH ATTACHMENTS**

Safety Management Policy Communication

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

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

- Employee memorandum through paycheck, daily manifest of work orders, agency meetings
- Bulletin board notices including AFSCME Union 2185 board.
- Employee memo notifications
- Departmental meetings to include quarterly meetings.

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

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

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

- Notice posted on vehicle and facilities including effective date and who to contact for more information
- Changes to digital rider guidance including schedules and ride guides as appropriate
- Public Meetings
- Social Media
- City of Kokomo Webpage
- Any services impacted by policies changes will include outreach as required by Federal Guidance.

Authorities, Accountabilities, and Responsibilities

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

Accountable Executive (AE): The Accountable Executive will determine, based on feedback from senior staff, the level of Safety Management System principals to maintain to ensure a safe work environment,

rider experience and community safety. SOK/CLT's AE is committed to providing employees with the tools and training needed to be successful and safe in their roles with SOK/CLT. The AE will continually strive to create a culture of safety among the employees, and SOK/CLT expects each employee to play a role in maintaining a safe workplace.

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

The current Accountable Executive, Jan Basil is also the Director of Transit and is responsible for implementation and changes to this Plan.

Chief Safety Officer (CSO): SOK/CLT has concluded one CSO will be sufficient to manage the day-to-day adherence to this Plan and, while in this role, report directly to the AE. As CSO, this individual will monitor safety and security throughout the organization including sub-contractors. All departments have been notified of the CSO's role and the established reporting requirements relating to safety-related matters.

SOK/CLT's CSO will be responsible for the following:

- Developing and maintaining SMS documentation;
- Directing hazard identification and safety risk assessment;
- Monitoring safety risk mitigation activities;
- Providing periodic reports on safety performance;
- Briefing the Accountable Executive and Board of Directors on SMS implementation progress; and
- Planning safety management training.

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

Accountable Executive

The Accountable Executive (AE), who also serves as Director of Transit, will work with the Chief Safety Officer (CSO) and administrative staff to adjust the PTASP as needed based on staff feedback, trends, and data analysis. The AE is vested with the primary responsibility for the activities of the transit system and overall safety performance. The AE fulfills these responsibilities by providing the resources necessary to achieve PTASP goals and objectives by exercising the approval authority for system modifications as warranted. The AE also sets the agenda and facilitates the cooperative decision making of the Leadership Council (management team). The AE meets all the requirements in §673.5 and §673.23(d)(1).

Chief Safety Officer (CSO)

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

Supervisors

Supervisors are responsible for the safety performance of all personnel and equipment under their supervision. They are responsible for the initial investigation of all accidents and incidents, and for reporting these accidents and incidents to the Human Resources, Risk Management, Transportation Operations Department and the MPO if medical care or vehicle is towed.

Employees

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

Key Staff

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

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

Employee Safety Reporting Program (ESRP)

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

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

- Pre/Post Trip Inspections
- Preventive Maintenance Inspections
- Employee Evaluations
- Facility Maintenance Plan
- Service Evaluation and Planning Program
- Training Program
- Rider and Public Complaint/Compliment Process
- Safety and Employee Meetings
- Incident/Accident Policies

COK's ESRP encourages employees who identify safety concerns in their day-to-day duties to report them to senior management in good faith without fear of retribution. There are many ways employees can report safety conditions:

- Report conditions directly to the dispatcher, who will add them to the daily Operations Log.
- Report conditions anonymously via a locked comment box in the driver area.
- Report conditions using their name or anonymously to jbasil@cityofkokomo.org.
- Report conditions directly to any supervisor, manager, or director.
- Report any safety concerns during the all staff quarterly meetings.

Examples of information typically reported include:

- Safety concerns in the operating environment (for example, county or city road conditions or the condition of facilities or vehicles);
- Policies and procedures that are not working as intended (for example, insufficient time to complete pre-trip inspection);
- Events that senior managers might not otherwise know about (for example, near misses); and
- Information about why a safety event occurred (for example, radio communication challenges).

On a daily basis, the Chief Safety Officer reviews the dispatch daily Operations Log, checks the comment box and dedicated email address, and documents identified safety conditions in the Safety Risk Register. COK's Chief Safety Officer will review and address each employee report, ensuring that hazards and their consequences are appropriately identified and resolved through COK's SRM process and that reported deficiencies and non-compliance with rules or procedures are managed through COK's Safety Assurance process.

COK's Chief Safety Officer discusses actions taken to address reported safety conditions in good faith. However, COK may take disciplinary action if the report involves any of the following:

- Willful participation in illegal activity, such as assault or theft;
- Gross negligence, such as knowingly utilizing heavy equipment for purposes other than intended such that people or property are put at risk; or
- Deliberate or willful disregard of regulations or procedures, such as reporting to work under the influence of controlled substances.

Sample Hazard Reporting Process

SOK/CLT has developed a Hazard Report Form used to identify and provide information about hazards observed by SOK/CLT employees while on-duty. The three-page form identifies vital information to assist employees in determining an action to mitigate the threat or hazard. This form is not meant to replace accident forms currently being used, but instead used in conjunction with the accident forms. It is a proactive reporting method to identify a perceived threat or hazard, potentially endangering employees, riders or the general public. The form serves a dual role as an incident, illness, and near miss report. The form is located in Appendix 1 of this Plan.

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

- Locations of blank Hazard Report Form
- When to use a Hazard Report Form
- Capturing critical information on the form
- Notification process depending on the hazard
- Proper assessment of the reported hazard
- Supervisor and CSO role in completing the form
- Follow-up process to determine effectiveness of mitigation

The following process is used as part of the ESRP.

Immediate Action Required

If you have identified a hazard which you perceive to be a risk to yourself, fellow employees, passengers, or the public you must report it immediately to the on-duty supervisor/dispatcher. Once reported you must determine if immediate action is necessary to prevent additional risk. If so, communicate to supervisor before taking action if time allows. Once action has been taken to mitigate the potential harm to yourself, others or property advise a supervisor of the results of your actions. Once you are able, complete the Loss Prevention Investigation Report with complete information and give to supervisor on-duty.

Delayed Action Required

Once a hazard has been identified, the SOK/CLT employee should assess if the hazard requires immediate action to reduce the risk of if delayed action can be taken. If the employee determines delayed action is appropriate a full report must be completed using the Loss Prevention Investigation Report and submitted to the on-duty supervisor.

Role of Supervisor

The on-duty supervisor is responsible for advising the employee on immediate action or delayed action to mitigate a hazard. The supervisor must then review the Loss Prevention Investigation Report to ensure all information is included adding additional information from their perspective. Once the form is complete it must be reviewed by the CSO to determine action necessary, investigate root cause of hazard and follow-up.

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

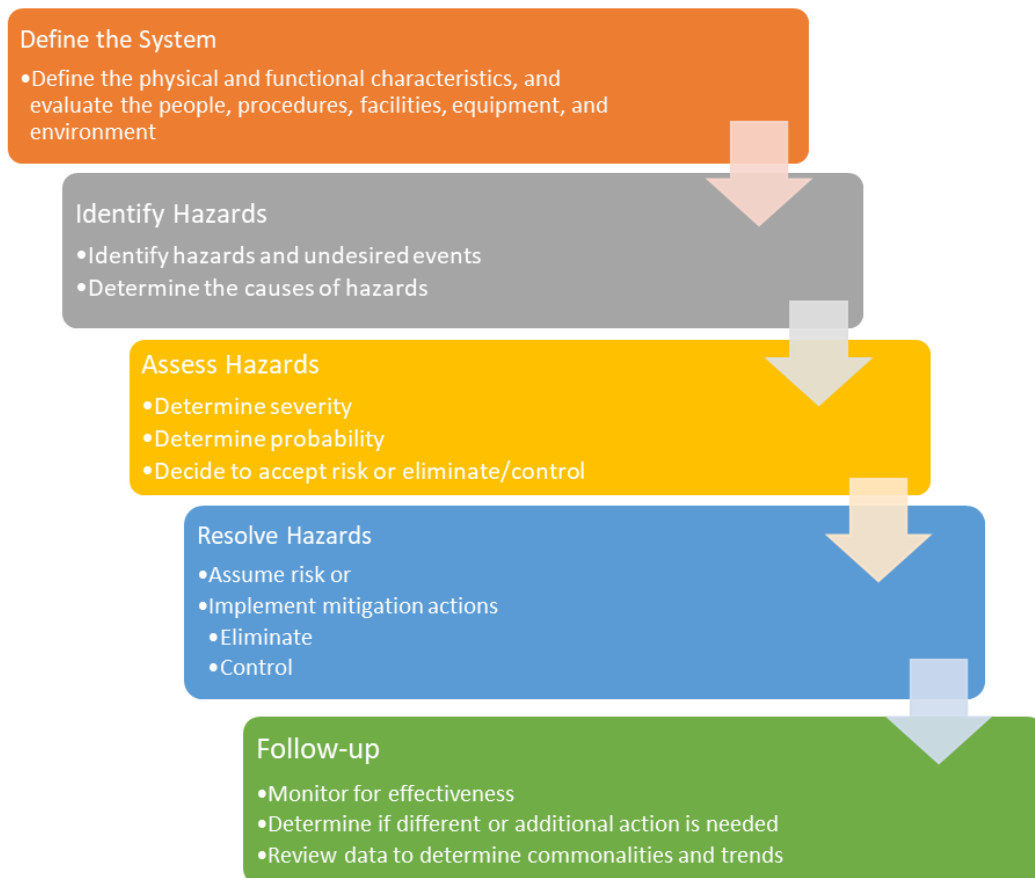
All hazard reports will be documented and integrated into current performance measures and data collection. The CSO will track each hazard to completion and recommend policy or procedural changes if needed as a result of the hazard mitigation.

SOK/CLT Responsibility

SOK/CLT takes every hazard report seriously and investigates each one to determine if it's an isolated case, or emerging trend requiring evaluation of policies and procedures or service modifications.

Employees reporting hazards will not face disciplinary action unless that employee contributed to the hazard. SOK/CLT wants to encourage all employees to report any hazard or threat they observe and help make the SOK/CLT system as safe as possible for its employees, riders, and the general public. Employees may report the hazard to their immediate supervisor or go directly to the CSO to submit and discuss their report.

The following process chart illustrates the steps taken as part of the hazard identification process through the ESRP.



Section 5. Safety Risk Management

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

Safety Hazard Identification

The safety hazard identification process offers SOK/CLT the ability to identify hazards and potential consequences in the operation and maintenance of our system. Hazards can be identified through a variety of sources, including:

- ESRP

- Review of vehicle camera footage;
- Review of monthly performance data and safety performance targets;
- Observations from supervisors;
- Maintenance reports;
- Comments from customers, passengers, and third parties;
- Drivers' and All-Staff Meetings;
- Results of audits and inspections of vehicles and facilities;
- Results of training assessments;
- Investigations into safety events, incidents, and occurrences; and
- Federal Transit Administration (FTA) and other oversight authorities (mandatory information source).

When a safety concern is observed by SOK/CLT's management or supervisory personnel, whatever the source, it is reported to SOK/CLT's Chief Safety Officer. Procedures for reporting hazards to SOK/CLT's Chief Safety Officer are reviewed during All-Staff Meetings. SOK/CLT's Chief Safety Officer also receives employee reports from the ESRP, customer comments related to safety, and the dispatch daily Operations Log. SOK/CLT's Chief Safety Officer reviews these sources for hazards and documents them in SOK/CLT Safety Risk Register.

SOK/CLT Chief Safety Officer also may enter hazards into the Safety Risk Register based on their review of SOK/CLT's operations and maintenance, the results of audits and observations, and information received from FTA and other oversight authorities, as well as the National Transportation Safety Board.

SOK/CLT's Chief Safety Officer may conduct further analysis of hazards and consequences entered into the Safety Risk Register to collect information and identify additional consequences and to inform which hazards should be prioritized for safety risk assessment. In following up on identified hazards, SOK/CLT's Chief Officer may:

- Reach out to the reporting party, if available, to gather all known information about the reported hazard;
- Conduct a walkthrough of the affected area, assessing the possible hazardous condition, generating visual documentation (photographs and/or video), and taking any measurements deemed necessary;
- Conduct interviews with employees in the area to gather potentially relevant information on the reported hazard;
- Review any documentation associated with the hazard (records, reports, procedures, inspections, technical documents, etc.);
- Contact other departments that may have association with or technical knowledge relevant to the reported hazard;
- Review any past reported hazards of a similar nature; and
- Evaluate tasks and/or processes associated with the reported hazard.

Any identified hazard that poses a real and immediate threat to life, property, or the environment must immediately be brought to the attention of the Accountable Executive and addressed through the SRM

process for safety risk assessment and mitigation. This means that the Chief Safety Officer believe immediate intervention is necessary to preserve life, prevent major property destruction, or avoid harm to the environment that would constitute a violation of Environmental Protection Agency or Any State environmental protection standards.

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

Personnel

Each SOK/CLT employee is evaluated annually to ensure they are performing their job to the expectations of the Agency. As part of their orientation process the employee is provided training and tools to perform their job while not receiving permanent status until completing 90 days of employment. During the 90 - day period, the employee is evaluated to determine if they are properly prepared to perform their job.

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

Assets

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

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

System

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

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

Hazard Identification Procedure

The FTA and other oversight authorities will be used as sources of hazard information (§673.25(b)(2)). Any employee seeing something through inspection or observation they deem to be a hazard are instructed to immediately report that hazard to the immediate supervisor regardless of the perceived level of threat. Depending on the situation, either the immediate supervisor or the employee will complete a Hazard Report Form and submit it to the CSO.

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

In some cases, a passenger or member of the general public may call SOK/CLT with a complaint about a front-line employee which may rise to the level of hazardous behavior or actions. SOK/CLT currently documents all customer complaints/compliments and takes appropriate action to investigate any complaints. Complaints deemed hazardous will trigger immediate action by on-duty supervisors.

Hazard Report Forms will be located on all vehicles along with standard safety kits for accident and incident reporting, with all Customer Service Representatives (CSR)'s, Dispatch, Operations, and Maintenance Departments. A copy of the form is located in Appendix 1.

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

Safety Risk Assessment

SOK/CLT assesses safety risk associated with identified safety hazards using its safety risk assessment process. This includes an assessment of the likelihood and severity of the consequences of hazards, including existing mitigations, and prioritizing hazards based on safety risk.

The Chief Safety Officer assess prioritized hazards using SOK/CLT Safety Risk Matrix. This matrix expresses assessed risk as a combination of one severity category and one likelihood level, also referred to as a hazard rating. For example, a risk may be assessed as "1A" or the combination of a Catastrophic (1) severity category and a Frequent (A) probability level.

This matrix also categorizes combined risks into levels, High, Medium, or Low, based on the likelihood of occurrence and severity of the outcome. For purposes of accepting risk:

- "High" Hazard ratings will be considered unacceptable and require action from SOK/CLT to mitigate the safety risk,
- "Medium" hazard ratings will be considered undesirable and require SOK/CLT to make a decision regarding their acceptability, and
- "Low" hazard ratings may be accepted by the Chief Safety Officer without additional review.

Using a categorization of High, Medium, or Low allows for hazards to be prioritized for mitigation based on their associated safety risk.

Once sufficient information has been obtained, the Chief Safety Officer will facilitate completion of relevant sections of the Safety Risk Register, using the SOK/CLT Safety Risk Assessment Matrix. The Chief Safety Officer will maintain on file, Safety Risk Assessment Packages, additional information collection, and completed Safety Risk Register sections for a period of three years from the date of generation.

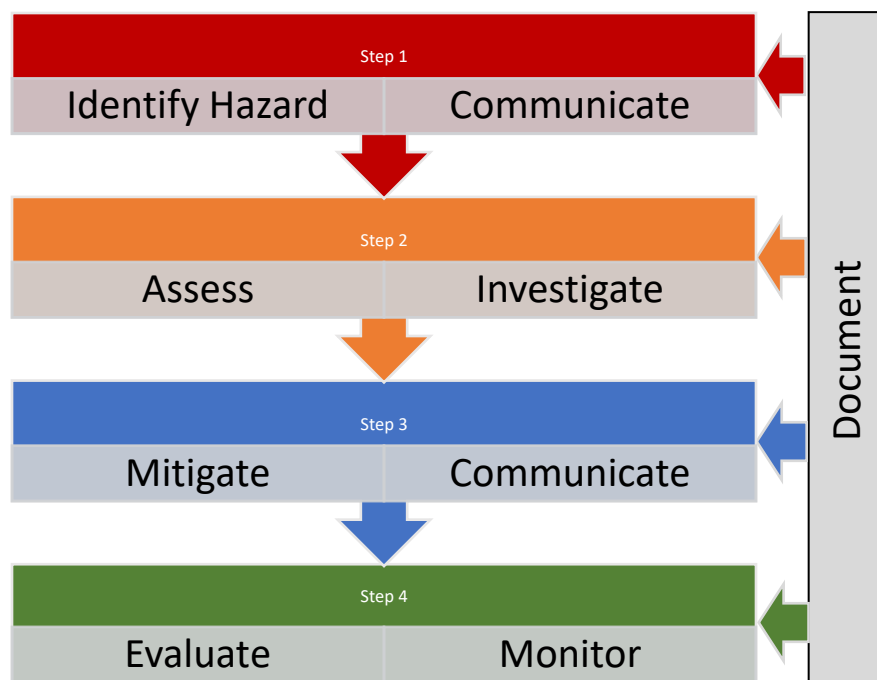
Safety Risk Mitigation

In response to all identified and assessed hazards, SOK/CLT will identify mitigations necessary to reduce the likelihood and severity of the potential consequences of hazards. Mitigation strategies will be dependent on results of investigation into the elements contributing to the risks. The investigation may include more than one department and may include interviews outside of the transit system.

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

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

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



Section 6. Safety Assurance

Through our Safety Assurance process, SOK/CLT:

- Evaluates our compliance with operations and maintenance procedures to determine whether our existing rules and procedures are sufficient to control our safety risk;
- Assesses the effectiveness of safety risk mitigations to make sure the mitigations are appropriate and implemented as intended;
- Investigates safety events to identify causal factors; and
- Analyzes information from safety reporting, including data about safety failures, defects, or conditions.

Safety Performance Monitoring and Measurement

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

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

Maintenance

Maintenance Standards and Procedures

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

Operator Inspections

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

Daily Servicing and Inspections

The SOK/CLT Maintenance Department inspects and services buses used in revenue service each day. The buses are fueled and washed, all fluids are checked, tires and lugs are checked, and the vehicle is inspected for any leaks or unusual noises. The operators clean the bus interiors each day. When a defect

is noted, it is reported to the Lead Mechanic or Supervisor on shift so that evaluation and, if necessary, a repair can be conducted.

Mileage-Based Maintenance Inspections

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

Maintenance Inspections of Contracted Providers

The City of Kokomo does not currently have contracted providers for any transportation services. Oversight on all PTASP policy requirements will be provided in the event there is a contracted provider.

Operations

Infectious Disease Risk Management

Epidemics/Pandemics: Although different in definition, both epidemics and pandemics within our area will be treated with the same urgency as far as safety for our drivers, staff, riders and community.

Epidemic: a widespread occurrence of an infectious disease in a community at a particular time.

Pandemics are unpredictable events; it is impossible to forecast their characteristics or severity accurately. The Centers for Disease Control and Prevention define a severe pandemic as a Category 4 or 5 with case fatality ratio of 1 percent or higher. Given today's highly mobile population, if a severe pandemic emerges, outbreaks may occur nearly simultaneously across the country making reallocation of resources more difficult than in other emergencies. While a pandemic will likely affect a given community for six to eight weeks, nationally a wave may linger for 12 weeks or longer.

The Spirit of Kokomo and City Line Trolley will practice strategies consistent with Centers for Disease Control and Prevention or State health authority guidelines.

SUPPORTING ACTIONS QUESTIONS TO CONSIDER

- Prioritize services/functions given their value to clients and the community (i.e., hours of service, routes and modes). Maintain those essential functions and processes required to sustain essential services and operations. Identify potential "non-essential" services, functions, and processes that can be suspended or adapted to other more essential uses. Communicate with clients and local emergency response officials the need to jointly plan and prepare for an influenza pandemic.
- How would a severe pandemic affect client demand and operations? For example, disease containment strategies may lower demand for mass passenger carriers (i.e., bus), while demand for fixed route and paratransit type vehicles might increase.
- At what level, if any, are businesses and other destinations where passengers typically travel likely to continue operating? What will the impact be if "non-essential" businesses reduce operations or close temporarily? Will paratransit demands decrease for such as transporting essential workers who need the transit service and for other typical individual requirements (i.e., medical care and food)?

- Can bus routes be modified quickly based on changing demand (e.g., as the pandemic unfolds potentially reducing low passenger load bus routes and beefing up service on arterial streets to provide better than normal service on fewer routes)?
- Informational flyers will be posted to inform staff and passengers on best practices.

Transit Staff, Vehicles, Stops and Transfer Station:

- Enhanced cleaning and sanitation efforts will be ramped up immediately upon notification of a pending epidemic or pandemic and will continue at a heightened level. Disinfecting agents for use by staff, riders and general public to help mitigate the spread of disease will be used (e.g., hand sanitizer).
- Any staff member presenting with a fever, symptoms of pandemic illness and/or other illnesses are to report them immediately to their supervisor. No one is to work with a fever. CDC recommendations will be followed.
- Good hygiene and hand washing practices are to be followed at all times (not just during an outbreak, epidemic and/or pandemic).
- Office supervisors will assess the health of the staff on a daily basis, asking basic health questions:
 - How are you feeling? Do you have any of these symptoms that are not caused by another condition?
 - Fever or chills
 - Cough
 - Shortness of breath or difficulty breathing
 - Fatigue
 - Muscle or body aches
 - Headache
 - Sore throat
 - Congestion
 - Nausea or vomiting
 - Have you been in direct contact with anyone that has tested positive for the illness?

Facility Monitoring

Formal facility inspections of all SOK/CLT facilities and grounds are conducted by the AE or CSO Maintenance/Safety/Facilities quarterly using a facility checklist. The purpose of the inspections is to identify any unsafe or unhealthy conditions which may exist, and that may require maintenance or modification. Each facility is also visually inspected for compliance with OSHA and local fire codes.

Any guests to SOK/CLT’s administration facility must check in through a secured process requiring check-in and validation of visit purpose. Employees are trained on procedures for visitors in the workplace and facility access is limited through security systems.

Frequency

The Chief Safety Officer conducts its safety inspections quarterly. Mechanics and Facilities Maintenance employees look for potential hazards with equipment whenever they are using that equipment. The vehicle hoists, chain pulls, and cranes in the vehicle maintenance shop are inspected annually by contractors. Preventive maintenance of equipment and facilities is performed in accordance with the manufacturer's recommended practice. Hazards are also identified by analyzing work accident trends, through Hazard Report Forms submitted by employees. Forms are used by employees to report safety concerns and to make safety recommendations.

Reporting

When deficiencies are noted during quarterly inspections, they are documented and reported to the director of the department in which the safety hazard is located. When safety hazards are noted by non-scheduled observation, they must be reported by the observer to a supervisor or CSO. Hazard Report Forms are routed to the department, Chief Safety Officer or director best equipped to evaluate the concern and, when necessary, propose a resolution.

Hazard Resolution

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

Follow-up

Corrective action for a confirmed hazard that has been identified by any established process is the responsibility of the director of the department area in which the hazard exists or the CSO. This includes arranging for the services of other SOK/CLT departments or outside parties, as necessary, to eliminate or control the hazard.

Documentation

Hazards that have been identified, proposed resolutions, and corrective actions are recorded in hard copy by the Authorized Executive and maintained by CSO.

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

Employee Hazard Reporting

Loss Reports

Employees can fill out a Hazard Report Form which is turned into the effected department and the CSO, talk with a supervisor or the Operations Manager. Depending on the severity/risk of the hazard identified, immediate action may be taken- Feedback will be provided to the employee on what action, if any, will be taken. All employees follow the Employee Hazard Reporting Program Policy.

Route/Operations Safety

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

Safety Events

Accident and Incident Reporting Process

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

The Spirit of Kokomo/City Line Trolley Operator's Manual includes procedures and responsibilities for accident/incident investigation. The combined manuals establish procedures for accident notification, response, and investigation.

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

Most accidents and incidents involving SOK/CLT are relatively minor in severity and are investigated by Transit Supervision. Since most accidents involve buses, this section focuses on bus accidents. However, all non-bus accidents and incidents are also investigated.

Notification

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

At-Scene Procedures

Bus Operators will adhere to the following procedures defined in the Spirit of Kokomo/City Line Trolley Transportation Operator's Manual:

- Assist the injured.
- If blocking traffic, set out reflective triangles.
- Do not move the coach unless required to do so by an Operations Supervisor, fire or police order, or impending danger from traffic.
- Obtain names, addresses, and phone numbers of all witnesses.

Operations Supervisors are responsible for conducting on-scene investigations of accidents and incidents. Depending on the severity and the nature of the event, various mechanisms will be used for

preserving transient evidence. These may include digital photography, bus video, field sketches, interviews, and observations.

Investigation

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

Accident Review Process

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

Preventable accidents are defined as those accidents that could have been reasonably avoided if the operator had followed all defensive driving techniques as established by the National Safety Council Guidelines, the Five Keys of the Smith System, and/or Transit Operations Procedures and Policies.

After reviewing all related documents and evidence, the investigating Operations Supervisor, CSO, Risk Manager makes an independent preliminary determination of whether the accident was preventable.

All disciplinary actions will follow the procedures outlined in the current AFSCME Local 2185 Transit Contract.

Hazard Resolution

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

Follow-up

Follow-up in the form of corrective actions is the responsibility of the employee's director. The responsibility may be delegated to the employee's manager, supervisor or CSO.

Any disciplinary action will be assessed using the current AFSCME Local 2185 Transit contract. Disciplinary consequences for accidents may include warnings, suspensions, and discharge.

Internal Reporting

The Operations Supervisor is responsible for ensuring that all accident reports are completed and filed with Human Resources, Central Equipment and CSO. Human Resources will advise on the history of the employee if a pattern of safety events is evident.

Documentation

Transit Operations and Human Resources and CSO maintain the accident investigation documentation.

Performance Measures

Through a series of performance measures relative to operations, maintenance, and safety, SOK/CLT can monitor the system's safety by identifying trends and gaps in policies, procedures, training, and monitoring efforts. The following performance measures are on a daily, monthly, and quarterly basis.

Maintenance (examples)

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

Operations

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

Safety

- **Safety Performance Measure: Fatalities** (total number of reportable fatalities and rate per total vehicle revenue miles by mode)
- **Safety Performance Measure: Injuries** (total number of reportable injuries and rate per total vehicle revenue miles by mode)
- **Safety Performance Measure: Safety Events** (total number of reportable events and rate per total vehicle revenue miles by mode)
- **Safety Performance Measure: System Reliability** (mean distance between major mechanical failures by mode)

Results from the above processes are compared against recent performance trends quarterly and annually by the Chief Safety Officer to determine where action needs to be taken. The Chief Safety Officer enters any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for reevaluation.

SOK/CLT monitors safety risk mitigations to determine if they have been implemented and are effective, appropriate, and working as intended. The Chief Safety Officer maintains a list of safety risk mitigations in the Safety Risk Register. The mechanism for monitoring safety risk mitigations varies depending on the mitigation.

The Chief Safety Officer establishes one or more mechanisms for monitoring safety risk mitigations as part of the mitigation implementation process and assigns monitoring activities to the appropriate director, manager, or supervisor. These monitoring mechanisms may include tracking a specific metric on daily, weekly, or monthly logs or reports; conducting job performance observations; or other activities. The Chief Safety Officer will endeavor to make use of existing SOK/CLT processes and activities before assigning new information collection activities.

SOK/CLT's Chief Safety Officer will review the performance of individual safety risk mitigations based on the reporting schedule determined for each mitigation, and determine if a specific safety risk mitigation is not implemented or performing as intended. If the mitigation is not implemented or performing as intended, the Chief Safety Officer will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Accountable Executive will approve or modify this proposed course of action and oversee its execution.

SOK/CLT's Chief Safety Officer also monitors SOK/CLT's operations on a large scale to identify mitigations that may be ineffective, inappropriate, or not implemented as intended by:

- Reviewing results from accident, incident, and occurrence investigations;
- Monitoring employee safety reporting;
- Reviewing results of internal safety audits and inspections; and
- Analyzing operational and safety data to identify emerging safety concerns.

The Chief Safety Officer works with the Accountable Executive to carry out and document all monitoring activities.

SOK/CLT maintains documented procedures for conducting safety investigations of events (accidents, incidents, and occurrences, as defined by FTA) to find causal and contributing factors and review the existing mitigations in place at the time of the event (see SOK/CLT Safety Event Investigation Procedures Manual for specific procedures for conducting safety investigations). These procedures also reflect all traffic safety reporting and investigation requirements established by Any State's Department of Motor Vehicles.

The Chief Safety Officer maintains all documentation of CT's investigation policies, processes, forms, checklists, activities, and results. As detailed in SOK/CLT's procedures, an investigation report is prepared and sent to the Accident/Incident Review Board for integration into their analysis of the event.

SOK/CLT's Accident/Incident Review Board consists of seven members that represent management, the union, operations, and maintenance. The Chief Safety Officer chairs the board. SOK/CLT's Accident/Incident Review Board determines whether:

- The accident was preventable or non-preventable;
- Personnel require discipline or retraining;
- The causal factor(s) indicate(s) that a safety hazard contributed to or was present during the event; and
- The accident appears to involve underlying organizational causal factors beyond just individual employee behavior.

The Chief Safety Officer routinely review safety data captured in employee safety reports, safety meeting minutes, customer complaints, and other safety communication channels. When necessary, the Chief Safety Officer ensures that the concerns are investigated or analyzed through SOK/CLT's SRM process.

The Chief Safety Officer also reviews internal and external reviews, including audits and assessments, with findings concerning SOK/CLT's safety performance, compliance with operations and maintenance procedures, or the effectiveness of safety risk mitigations.

7. Safety Promotion

Operator Selection

Hiring Practices

The City of Kokomo is committed to equal employment opportunity and employs all qualified persons without regard to race, color, religion, national origin, sex, age, handicap, or any other classification protected by the federal, state or local laws.

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

SOK/CLT's hiring process includes the following components:

Applications

Applicants are sought through postings in traditional and culturally diverse media, referrals from current employees, posted in City Hall, local newspaper, SOK/CLT website and The City of Kokomo Facebook page. Applications filed by prospective candidates when there are no positions available are held by the HR department and referenced as soon as position is available. The applications are screened by key personnel in Human Resources and Transit Operations.

Interview

After application reviews, applicants are then interviewed by the HR director and Transit director. The interview process is designed to evaluate a candidate's strengths in client service, the ability to simultaneously perform tasks, conflict resolution, and the ability to perform well under temporal and interpersonal pressure.

Driving Record

To be eligible for hire, a candidate must submit an acceptable driving SOK/CLT tract dating back five years. This establishes 21 years as the de facto minimum age requirement for new hire Bus Operators.

Licensing

To be eligible for hire, a candidate must be able to earn a CDL with a Passenger and Air Brake Endorsement.

Criminal Background Check

Effective January 1, 2021: To be eligible for hire, a candidate must submit to a Criminal Background Check administered by Good Hire, Inc. The results must meet all statutory and SOK/CLT standards for the Bus Operator position.

Drug Testing

To be eligible for hire, a candidate must produce a negative result for a pre-employment drug test.

Physical Capacities Testing

To be eligible for hire, a candidate must pass a position-specific physical capacities test. All SOK/CLT drivers are required to maintain a valid CDL, which includes a physical examination performed by a medical professional.

Training

There are formal training programs for Bus Operators, Maintenance employees and Operations employees. These include training classes, manuals, SOK/CLT Standard Operating Procedures, and on-the-job training.

The safety component of training is designed to make employees aware of the hazards associated with their jobs and the appropriate methods for controlling these hazards. The training is intended to motivate employees to work safely. Trainings fall into three main categories: (1) Initial, (2) Periodic, and (3) Remedial or Refresher.

Initial Bus Operator Training/Online TAPTCO Training

New Bus Operators receive an intensive two-twelve weeks of training course that covers every aspect of their new job. Some components of the training are delivered in the classroom. The majority of learning occurs on the buses during off-route and on-route training. The training includes, but is not limited to, the following areas. In addition of the initial bus operator training, all drivers will participate and pass a 66 hour TAPTCO training program. Some of the following will be included in both the initial and online TAPTCO training.

- Smith System of Driving
- Orientation to Spirit of Kokomo/City Line Trolley systems
- Basic Bus Maneuvers
- Advanced Bus Maneuvers
- Service Stops
- System Overview
- System Procedures
- Communication skills
- Client Service/Passenger Assist
- Accessible Service

- Emergency Management
- Fleet Services
- Personal Safety
- Health/Injury Prevention
- Stress Management
- CDL Preparation
- On-route Training
- Vehicle Orientation of all Vehicles
- Cleaning and sanitizing vehicles and work areas

On-route training provides real service experience with an Operator Instructor on the new operator's regularly scheduled work. The time the new employee operates the revenue route is increased daily. Each day the new driver receives a full review and debriefing from his or her instructor. New driver rotation among the driver trainers group provides each new driver with experience across a variety of routes, vehicles, times of day, instructional styles, and driving conditions.

After the initial training, new Bus Operators receive additional support and training, including:

- Passenger Assist training
- First Aid/CPR
- Defensive Driving Course (DDC)
- Refresher (when needed)
- Passenger securement of Mobility Devices
- Daily disinfecting practices

Bi-Annual Training for All Bus Operators

Bi-annually, all training provided through the initial hire-on process is provided in order to refresh knowledge and update practices to include:

- Fatigue Awareness
- Dealing With Difficult People
- Resolving Conflict
- Harassment
- Proper Securement of Mobility Devices

- Defensive Driving Course (DDC)
- Blood borne Pathogens
- Safety/Security Update
- Injury Prevention
- First Aid/CPR
- PTASP

Partial-day trainings are also scheduled on safe winter driving and whenever warranted by the addition of new equipment or a change in configuration.

Initial Operation Supervisor Training

A Supervisor performs many functions and receives training in, but not limited to, the following areas:

- Drug & Alcohol (Policy and procedures for all types of FTA-mandated testing)
- Accident Investigation (based on the TSI model)
- Emergency Procedures
- Security Procedures
- On-the-job Injury Claims
- Blood Borne Pathogens
- Data Entry and Recordkeeping
- Harassment
- Cultural Diversity
- Coaching/Criticism/Discipline
- Dispatch Operations
- Field Operations
- Conflict Resolution

Injury and Illness Prevention Training

Injury and Illness Prevention Training is directed toward achieving a safe working environment for all employees and reducing the chance of occupational-related injuries and illnesses. The majority of training, targets employees working in the Maintenance and Facilities Maintenance Departments because these employees have the greatest exposure to occupational hazards. The program is based on applicable Federal, State, and local safety codes and regulations. Some areas addressed in training include:

- Handling Hazardous Materials (Right to Know)
- Slips, Trips, and Falls
- Personal Protection Equipment
- Material Safety Data Sheets (MSDS) and Labels
- First Aid
- Blood borne Pathogens
- Hazardous Materials Storage
- Strains and Sprains
- Fall Protection

Emergency Response Planning and Coordination

Details are contained in the Emergency Preparedness Plan.

Safety Management System (SMS) Training

All employees will be trained on the processes and procedures held within the PTASP to include refresher training at any time the PTASP is updated.

Safety Communication

SOK/CLT's Chief Safety Officer and Director of Human Resources and Training coordinate SOK/CLT's safety communication activities for the SMS. SOK/CLT's activities focus on the three categories of communication activity established in 49 CFR Part 673 (Part 673):

- Communicating safety and safety performance information throughout the agency: SOK/CLT communicates information on safety and safety performance in its quarterly newsletter and during quarterly All-Staff Meetings. SOK/CLT also has a permanent agenda item in all Drivers' Meetings dedicated to safety. Information typically conveyed during these meetings includes safety performance statistics, lessons learned from recent occurrences, upcoming events that may impact SOK/CLT's service or safety performance, and updates regarding SMS implementation. SOK/CLT also requests information from drivers during these meetings, which is recorded in meeting minutes. Finally, SOK/CLT's Director of Human Resources and Training posts safety bulletins and flyers on the bulletin boards located in all bus operator and maintenance technician break rooms, advertising safety messages and promoting awareness of safety issues.
- Communicating information on hazards and safety risks relevant to employees' roles and responsibilities throughout the agency: As part of new-hire training, SOK/CLT distributes safety policies and procedures, included in the SOK/CLT Employee Handbook, to all employees. SOK/CLT provides training on these policies and procedures and discusses them during safety talks between supervisors and bus operators and vehicle technicians. For newly emerging issues or safety events at the

agency, SOK/CLT's Chief Safety Officer issues bulletins or messages to employees that are reinforced by supervisors in one-on-one or group discussions with employees.

- Informing employees of safety actions taken in response to reports submitted through the ESRP: SOK/CLT provides targeted communications to inform employees of safety actions taken in response to reports submitted through the ESRP, including handouts and flyers, safety talks, updates to bulletin boards, and one-on-one discussions between employees and supervisors.

System Modification Design Review and Approval

General Process

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

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

Modification Design Review

A review of any modification in equipment design shall be made by the director and managers of the department responsible for the equipment. It is an informal practice to include Operations in the review of any change that might affect safety. The impact on the safety of all designs and specifications should be identified and evaluated before the change is approved. Some of the areas to be considered include but are not limited to:

- Hazardous Materials (handling and use)
- Motor Vehicle Safety
- Human Factor
- Occupational Health and Safety
- Materials Compatibility
- Fire Protection
- Lighting
- Braking systems
- Mirrors
- Warning Devices

Modifications must not be made before it is determined how they might affect the safety of the system, or any other systems. Other departments may evaluate a proposed change to determine its compatibility with other systems (e.g., hoists, fueling systems, communications systems). The evaluation may also include a review of applicable regulations, such as the Federal Motor Vehicle Safety Standards and Regulations and the U.S. Department of Labor's Occupational Safety and Health Act.

Testing may also be performed to evaluate the safety of a proposed modification. The testing of small changes may be minimal. For substantial modifications, extensive field testing, mock-ups, and structural evaluations may be employed.

Modification Design Approval

Final approval is generally made by either the Director of Central Garage or the Funding Entity. When modifications are made by a bus manufacturer, the Director of Central Garage works with the manufacturer, and contractual changes may be made. If changes are substantial, additional training will be provided for maintenance and operation staff.

Monitoring

Once a modification is put in place, feedback from the operating department is solicited to evaluate the performance of the modification. Unsolicited input from the operating department and its employees (end users) is also encouraged. Depending on the nature of the modification, the Funding Entity, Transit Director and Director of Central Garage may be involved for input.

Documentation

The Central Equipment Department is responsible for documenting any vehicle modifications. City of Kokomo Facilities Manager is responsible for documenting any modifications made to a facility. Documentation may involve changing diagrams, schematics, manuals, service bulletins, service intervals, standard operating procedures, and Material Safety Data Sheets. Maintenance Supervisors are responsible for updating Safety Data Sheets based on input from product manufacturers.

Routes

Route modifications are designed by the Transit Director, the Engineering department, and Funding Entity. Transit may use a current Bus Operator to test routing and bus stop placement. This experience-based, real-world process is designed to protect the safety of the transit bus, transit passengers, other vehicles, and pedestrians.

The Transit Department informs the Operations Department and Funding Entity of any proposed route modifications. The Transit Department will request The Citizens' Advisory Committee evaluate a specific proposal, or the Committee can choose to evaluate any proposed modifications.

Transit operations management may request a route modification it believes will improve operations. It may also choose to evaluate a modification that has been proposed by another department. Input from individual Bus Operators is encouraged through the Hazard Report Form, direct communication, and periodic surveying of Operators conducted by the Transit Department.

Finally, the Transit Department maintains a cooperative working relationship with the appropriate planning and road departments of all municipal levels of government within which SOK/CLT operates.

Additional Information

This PTASP was developed from information in other SOK/CLT documents, policies and procedures and manuals. Those documents are listed below:

- SOK/CLT Employee Handbook
- Vehicle Maintenance Plan
- City Ordinances
- Facility Maintenance Plan
- Training Manual
- Transit Asset Management Plan
- Rider Policy
- Emergency Preparedness Plan

SOK/CLT retains required SMS documentation for at least three years and will make this documentation available upon request to the FTA or other oversight agencies.

FRONT-LINE EMPLOYEE INVOLVEMENT

As required, the development and updating of this Plan will involve the input of the front-line employees. To fulfill this requirement, all employees will be provided with a copy of the draft with two (2) weeks to review and submit comments, recommendations, or questions. The editor of this document will maintain a signature list of all employees receiving a copy of said draft. The signature list will become part of the document as an attachment. A compilation of comments received will also be developed and included as an attachment.

RECORD RETENTION

All documents referenced in the ASP will be maintained in accordance with the City of Kokomo's record retention policy, which is currently set at 5 years. All documents will be maintained by the AE.

Definitions of Terms Used in the Safety Plan

SOK/CLT incorporates all of FTA's definitions that are in 49 CFR § 673.5 of the Public Transportation Agency Safety Plan regulation.

- **Accident** means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

- **Accountable Executive** means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan, in accordance with 49 U.S.C. 5326.
- **Equivalent Authority** means an entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipients Public Transportation Agency Safety Plan.
- **Event** means Accident, Incident, or Occurrence.
- **Hazard** means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
- **Incident** means an event that involves any of the following; a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
- **Investigation** means the process of determining the causal and contributing factors of an accident, incident, or hazard for the purpose of preventing recurrence and mitigating risk.
- **National Public Transportation Safety Plan** means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
- **Occurrence** means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
- **Operator of a Public Transportation** system means a provider of public transportation as defined under 49 U.S.C. 5302.
- **Performance Measure** means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
- **Performance Target** means a quantifiable level of performance or condition, express as a value for the measure, to be achieved within a time period required by the FTA.
- **Public Transportation Agency Safety Plan (or Agency Safety Plan)** means the documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
- **Risk** means the composite of predicted severity and likelihood of the potential effect of a hazard.

- **Risk Mitigation** means a method or methods to eliminate or reduce the effects of hazards.
- **Safety Assurance** means processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
- **Safety Management Policy** means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
- **Safety Management System** means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
- **Safety Performance Target** means a performance target related to safety management activities.
- **Safety Promotion** means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.
- **Safety Risk Assessment** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
- **Safety Risk Management** means a process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
- **Serious Injury** means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) involves any internal organ; or (5) involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.
- **Transit Agency** means an operator of a public transportation system.
- **Transit Asset Management Plan** means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR Part 625.

Commonly Used Acronyms

<u>Acronym</u>	<u>Word or Phrase</u>
ADA	Americans with Disabilities Act of 1990
ASP	Agency Safety Plan (also referred to as a PTASP in Part 673)
CFR	Code of Federal Regulations
SOK/CLT	Spirit of Kokomo/City Line Trolley
ESRP	Employee Safety Reporting Program
FTA	Federal Transit Administration
MPO	Metropolitan Planning Organization
Part 673	49 CFR Part 673 (Public Transportation Agency Safety Plan)
SMS	Safety Management System
SRM	Safety Risk Management
U.S.C.	United States Code
VRM	Vehicle Revenue Miles

APPENDIX 1

HAZARD REPORT FORM

Use this form to report Safety/Hazard concerns

Employee Name		Date/Time
Location		Supervisor
Describe fully the Safety or Hazard Concern		
<hr/> <hr/> <hr/> <hr/> <hr/>		
What can be done to make this situation SAFE?		
<hr/> <hr/> <hr/> <hr/>		
YES	NO	Has the Supervisor in that area been notified of the Safety/Hazard concern?
YES	NO	Has the maintenance team been notified of the Safety/Hazard concern?
Employee Signature:		Date:
Follow-up Action		

REMOVE THIS PAGE AND INSERT KHCGCC
RESOLUTION APPROVING POLICY

REMOVE THIS PAGE AND INSERT SAFETY
MANAGEMENT POLICY STATEMENT SIGNED
BY CURRENT ACCOUNTABLE EXECUTIVE

REMOVE THIS PAGE AND INSERT FRONT
LINE EMPLOYEE SIGNATURE LIST

REMOVE THIS PAGE AND INSERT
COMMENT COMPILATION

The Comprehensive Agency Safety Plan (referred to as PTASP) is hereby approved by the City of Kokomo, Board of Public Works and Safety and the Kokomo Howard County Governmental Coordinating Council's Policy Board.

City of Kokomo, Indiana by and through
its Board of Public Works and Safety

Kokomo Howard County Governmental
Coordinating Council Policy Board

By: _____
Weston Reed, President
Board of Public Works and Safety

By: _____
Chairman, KHCGCC Policy Board
Kokomo Howard County Governmental
Coordinating Council

Date: _____

Date: _____

ATTEST:

By: _____
Sarah White, Clerk
Board of Public Works and Safety

By: _____
Greg Sheline, Secretary/Treasurer
KHCGCC Policy Board

Date: _____

Date: _____

REMOVE THIS PAGE AND INSERT APPROVED
BOARD OF WORKS MEMO