

RTAP News



New Hampshire RTAP Quarterly Newsletter

March 2020

COVID 19 and the Transit Industry

Transportation systems are always important for communities and our country, and never more so than during a crisis. The COVID 19 virus is no exception. As transit system managers we understand the services we provide may be an individual's only connection for essential medical treatment and to access necessary groceries and supplies. We ask ourselves: What can we do to keep our passengers and drivers protected.? This article identifies protective measures all transit system can take.

Keep Vehicles and Facilities Clean

Increase the frequency and intensity of all cleaning routines by utilizing EPA-approved, anti-viral cleaning agents in order to maintain the highest levels of sanitation. Restrict access to facilities to staff only when possible. Consult with the New Hampshire Department of Health and the Centers for Disease Control and Prevention (CDC) to ensure appropriate preventative measures are being utilized.

Educate Staff and Passengers on Necessary Precautions

- Remind passengers and employees to please follow health and safety protocols established by the CDC. These include recommendations to:
 - Wash your hands often with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer that includes at least 60-percent alcohol.
 - Practice social distancing of six feet if possible.
 - Cover your cough or sneeze with a tissue, then throw the tissue in the trash. If you do not have a tissue, cough or sneeze into your elbow instead of your hands.
 - Clean and disinfect frequently touched objects and surfaces.
 - Take your temperature at least once daily, if you have a fever stay home.
 - Individuals who are experiencing symptoms and may have traveled to areas of concern or have been in contact with someone who has traveled to these areas should call ahead to their healthcare provider before presenting for treatment.

Other Precautions

Transit systems can take other precautions to protect our passengers and drivers. Additional precautions include:

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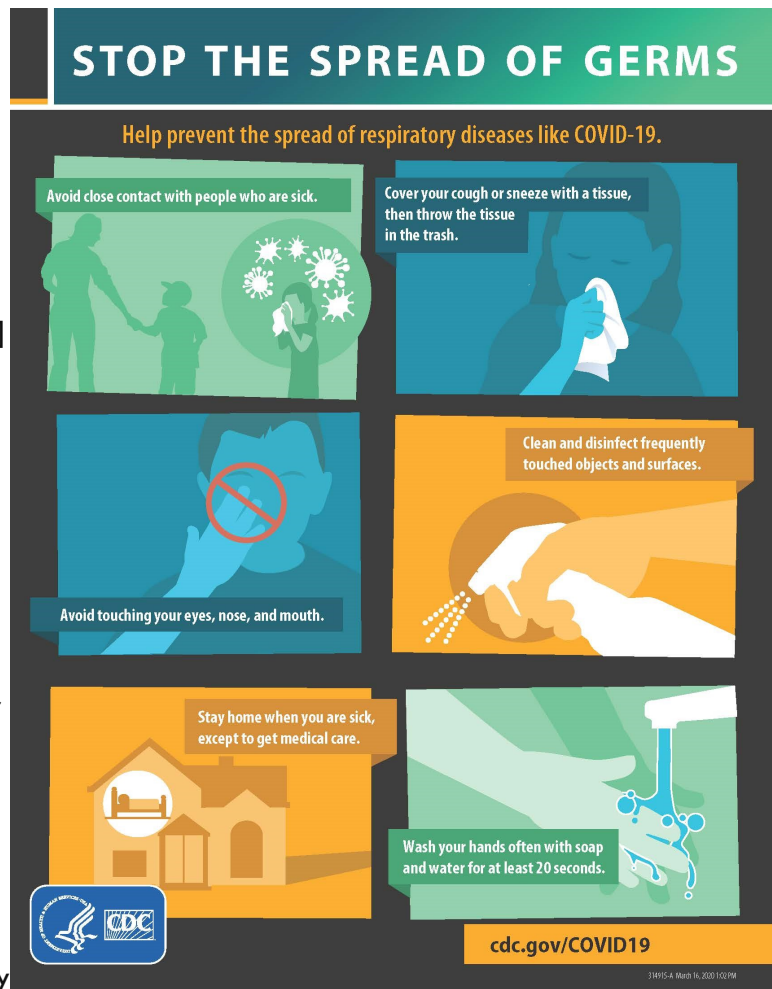
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Have an idea for the newsletter?
Let us know! Call 937-299-5007
or email Julie Schafer at
jschafer@rlsandassoc.com

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COVID 19 *(Continued from Page 1)*

- Promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands.
- Encourage workers to stay home if they are sick.
 - Employees who have symptoms of acute respiratory illness are recommended to stay home and not come to work until they are free of fever (100.4° F [38.0° C] or greater using an oral thermometer), signs of a fever, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). Employees should notify their supervisor and stay home if they are sick.
 - Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness or to return to work, as healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely way.
 - Employers should be aware that more employees may need to stay at home to care for sick children or other sick family members than is usual.
- Providing protective gloves for handling of fares and fareboxes.
- Providing protective masks for drivers and passengers.
- Ensuring waste baskets are available on board for passengers to discard items such as Kleenex.
- Post precautions on the vehicle and at transit stops.
- Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment, without sanitizing.
- Develop policies and procedures for prompt identification and isolation of sick people, if appropriate
 - Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, customers, visitors, and others at a worksite.
 - Encourage employees to conduct personal health checks twice a day, to include:
 - Taking their temperature to monitor for fever. If they have a temperature of 100.4 degrees Fahrenheit or higher, they have a fever and should not come into the workplace and should not go out in public.
 - Self-monitor for signs and symptoms of COVID 19 if they suspect possible exposure.
- Develop policies and procedures for employees to report when they are sick or experiencing symptoms of COVID 19



Should you have questions or concerns about the coronavirus, please consult the CDC's website at <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

ADA Reasonable Accommodation Refresher

On March 13, 2015, the U.S. Department of Transportation published a final rule in the Federal Register that had an impact on all providers of public transportation. The rule addresses the concept of “reasonable accommodation” in the delivery of transit services and requires a public transit provider to go beyond what was previously required in U.S. DOT’s ADA regulation. A transit system must make reasonable accommodations in policies, practices, or procedures when such accommodations are necessary to avoid discrimination on the basis of disability, unless the recipient can demonstrate that making the accommodations would fundamentally alter the nature of the service, program, or activity or result in an undue financial and administrative burden. The rules give public transportation providers the flexibility to implement their own method of compliance with the reasonable accommodation requirement. However, there are some basic rules to follow:

- The provider must make information about the process for requesting and receiving a reasonable modification accessible. Wherever information about the public transportation system is published, information about reasonable accommodations should also be included. It is also required that people with disabilities are able to access this information, which means that the information has to be available in alternative formats when requested.
- The provider must make the process for requesting a reasonable accommodation easily accessible to those people with disabilities.
- While the rule encourages individuals to make reasonable modification requests in advance, a transit agency may find situations where such requests cannot be made due to some barrier at the destination. In these instances, operating personnel may be required to make a determination on responding to the individual’s request while in revenue service. This means bus operators, dispatch personnel, and/or operations supervisors must be trained on these rules in order to ensure that inadvertent discrimination against an individual with disabilities

does not occur.

- At least one person at each public transportation entity must be designated as the responsible party to review, evaluate, implement, or document reasonable accommodation requests.
- Any entity must promptly communicate its response to the complaint allegations, including its reasons for the response, to the complainant and must ensure that it has documented its response. The passenger requesting a reasonable accommodation is not required to use the term “reasonable accommodation” or “reasonable modification” when making a request.

Transit Systems were to have put these policies and procedures in place by July 13, 2015. Reasonable accommodation requires modifications in policies, practices, and procedures, when necessary, in order to avoid discriminating against individuals with disabilities. As the name suggests, there is a “reasonableness” standard, and there are three exceptions to this rule give a general idea as to its limitations. The exceptions are:

1. Making the accommodation would fundamentally alter the nature of the public transportation service.
2. Making the accommodation would create a direct threat to the health or safety of others.
3. The individual requesting the accommodation is able to fully use the transportation entity’s service without the accommodation being made.

Visit the New Hampshire RTAP website at: <https://www.newhampshirertap.com/compliance> to see a sample reasonable accommodation policy that can be used as a template to create your own policy. If you are in doubt about how to respond to a reasonable accommodation request or have questions about any portion of the requirement, contact the New Hampshire RTAP staff at (937) 299-5007 or via email at jschafer@rlsandassoc.com.

Understanding Bloodborne Pathogens

Blood or body fluids may have pathogens (germs) that can cause disease. If there is an accident at work involving blood or body fluids, these germs can be spread. The most common and serious bloodborne germs are the hepatitis B virus (HBV), hepatitis C virus (HCV), and human immunodeficiency virus (HIV). Once these germs infect you, you may become sick. In turn, the germs may spread to your loved ones. The 3 bloodborne germs described below are the most common causes of infections in the workplace.

Hepatitis B virus (HBV)

- Hepatitis B can cause severe damage to the liver. It can even lead to death.
- A vaccine is available to help prevent hepatitis B infection. This vaccine is given as 3 shots over a period of time.
- Adults who aren't vaccinated and are exposed at work to another person's blood or body fluids can be given medicine or a vaccine after the exposure. This helps prevent infection from developing.

Hepatitis C virus (HCV)

- Like hepatitis B, hepatitis C can cause severe damage to the liver. It can lead to death.
- There is no known vaccine for HCV.

Human immunodeficiency virus (HIV)

- HIV makes it harder for the body to fight infection. HIV causes acquired immune deficiency syndrome (AIDS). This is a serious illness that can lead to death.
- There is no known vaccine for HIV.

How you could get infected in the transit industry

Bloodborne diseases can infect you when:

- You help an injured person without using a protective barrier between you and the infected person's blood or body fluids.
- An object or surface with infected blood or body fluids on it touches your broken skin.
- Contaminated body fluids on your unwashed hands come in contact with your eyes, nose, or mouth.
- You are pricked or scratched by a sharp object (such as broken glass or a needle) that has infected blood or body fluids on it.

Bloodborne Pathogen requirements in the transit industry

Transit systems must comply with OSHA standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens." The guidance and procedures are provided not only to increase workers' awareness of bloodborne pathogens, but to limit occupational exposure to blood and other potentially infectious materials since any exposure could result in transmission of bloodborne pathogens which spread disease. Transit systems must:

- Maintain and ensure that adequate supplies of Personal Protective Equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bio-hazard bags are made available as required by the standard and are available in the appropriate sizes.
- Ensure that all medical actions required including, offering hepatitis B vaccinations are offered, are performed and that the appropriate employee health and OSHA records are maintained.
- Provide annual training, maintain documentation of training and making the written exposure control plan available to employees, the Occupational Safety and Health Administration, (OSHA), the National Institute of Occupational Safety and Health, (NIOSH) and the U.S. Department of Health and Human Services (DOHHS) representatives.

Hepatitis B Vaccination

The hepatitis B vaccination and vaccination series must be made available after the employee has received their initial training and within 10 working days of initial assignment to all front-line employees such as drivers who have occupational exposure unless the employee has previously received the complete vaccination series, or wishes to decline the vaccination. If an employee initially declines the hepatitis B vaccination, but at a later date while still covered under the standard decides to accept the vaccination, the hepatitis B vaccination shall be made available to the employee at that time. Employers must make the hepatitis vaccination available:

- At no cost to the employee.
- At a reasonable time and place.
- Performed by or under the supervision of a licensed physician or licensed healthcare professional.

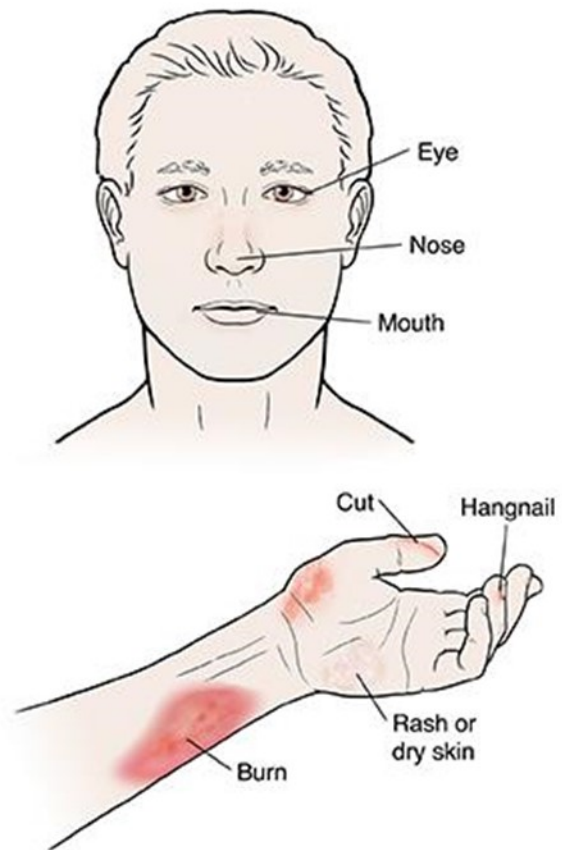
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Understanding Bloodborne Pathogens

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- Provided according to recommendations of the U.S. Public Health Service current at the time these evaluations and procedures take place.

The New Hampshire RTAP program provides a Bloodborne Pathogen Exposure Control Policy template that transit systems can customize. The policy template is available on the RTAP website at: <https://www.newhampshirertap.com/compliance>. If you have questions or need additional resources about please contact RTAP staff at (937) 299-5997 or jschafer@rlsandassoc.com.



Disease-carrying blood or body fluids can enter through any body opening or break in skin. If they do, you may become infected with disease.

Save the date!

SEPTEMBER 9-11, 2020

*vendor show September 10

Woodstock Inn, Woodstock, Vermont

Hosted by Vermont Public Transit Association



COVID 19: What Transit Systems Need to Know

During this time, it can be difficult, especially in the transit industry, to find credible and pertinent information on how to react to this National Emergency.

In an effort to provide that credible and pertinent information, NHRTAP has collected lists of resources, webinars and frequently asked questions from organizations like the CDC, the Federal Transit Administration, the American Public Transportation Association, and National RTAP. The following resources answer questions like should transit workers be wearing PPEs, how should transit buses be cleaned, what should transit systems do about drug and alcohol testing, and more.

CDC:

“Coronavirus Disease 2019 (COVID 19)”

- <https://www.cdc.gov/coronavirus/2019-ncov/faq.html#protect>

“Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID 19)”

- <https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/guidance-business-response.html>

FTA:

“DOT Guidance on Compliance with DOT Drug and Alcohol Testing Regulations”

- <https://www.transportation.gov/odapc/compliance-with-dot-drug-and-alcohol-testing-regulations>

“Frequently Asked Questions from FTA Grantees Regarding Coronavirus Disease 2019 (COVID 19)”

- <https://www.transit.dot.gov/frequently-asked-questions-fta-grantees-regarding-coronavirus-disease-2019-covid-19>

“U.S. Department of Transportation Announces Increased Flexibility to Help Transit Agencies Respond to Coronavirus”

- <https://www.transit.dot.gov/about/news/us-department-transportation-announces-increased-flexibility-help-transit-agencies>

American Public Transportation Association (APTA):

“Public Transit Response to Coronavirus or COVID 19” (Webinar)

- <https://www.apta.com/public-transit-response-to-coronavirus/>

“COVID 19 Virus Fact Sheet”

- https://www.apta.com/wp-content/uploads/COVID-19_Virus_Fact_Sheet.pdf

“Developing a Contagious Virus Response Plan”

- https://www.apta.com/wp-content/uploads/Standards_Documents/APTA-SS-SEM-S-005-09.pdf

National RTAP:

“Hot Topics- Coronavirus”

- <http://www.nationalrtap.org/Toolkits/Find-Anything-Toolkit/Free-And-Low-Cost-Resources/Hot-Topics#Coronavirus>

“Coronavirus Disease 2019 (COVID 19): Information and Resources for Transit”

- <https://nationalrtap.org/Resource-Center/Advanced-Search/fid/1082>

NHRTAP is always available for small urban and rural transportation providers to provide technical assistance and support and will remain available during this complex and difficult time. As always, if you have any questions or concerns please contact NHRTAP by phone at 937-299-5007 or by email at jschafer@rlsandassoc.com.

SYMPTOMS OF CORONAVIRUS DISEASE 2019

Patients with COVID-19 have experienced mild to severe respiratory illness.

Symptoms* can include

FEVER

COUGH

*Symptoms may appear 2-14 days after exposure.

SHORTNESS OF BREATH

Seek medical advice if you develop symptoms, and have been in close contact with a person known to have COVID-19 or if you live in or have recently been in an area with ongoing spread of COVID-19.



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For more information: www.cdc.gov/COVID19-symptoms

Drug & Alcohol Testing Compliance During COVID 19 Emergency

The FTA and US DOT have been inundated with drug and alcohol testing compliance questions during the COVID 19 emergency. Official guidance was issued on March 25, 2020. The guidance below is provided for quick reference, however you are encouraged to visit the ODAPC website at <https://www.transportation.gov/odapc/compliance-with-dot-drug-and-alcohol-testing-regulations> for complete details of the published guidance.

The below guidance on compliance with the DOT and modal drug and alcohol testing programs apply during this period of national emergency.

For DOT-Regulated Employers:

- As a DOT-regulated employer, you must comply with applicable DOT training and testing requirements. However, DOT recognizes that compliance may not be possible in certain areas due to the unavailability of program resources, such as collection sites, Breath Alcohol Technicians (BAT), Medical Review Officers (MRO) and Substance Abuse Professionals (SAP). You should make a reasonable effort to locate the necessary resources. As a best practice at this time, employers should consider mobile collection services for required testing if the fixed-site collection facilities are not available.
- If you are unable to conduct DOT drug or alcohol training or testing due to COVID 19-related supply shortages, facility closures, State or locally imposed quarantine requirements, or other impediments, you are to continue to comply with existing applicable DOT Agency requirements to document why a test was not completed. If training or testing can be conducted later (e.g., supervisor reasonable suspicion training at the next available opportunity, random testing later in the selection period, follow-up testing later in the month), you are to do so in accordance with applicable modal regulations. Links to the modal regulations and their respective web pages can be found at <https://www.transportation.gov/odapc/agencies>
- *If employers are unable to conduct DOT drug and alcohol testing due to the unavailability of testing resources, the underlying modal regulations continue to apply.* For example, without a “negative” pre-employment drug test result, an employer may not permit a prospective or current employee to perform any DOT safety-sensitive functions, or in the case of the Federal Aviation Administration (FAA), you cannot hire the individual (See 14 CFR § 120.109(1) and (2)).
- Additionally, DOT is aware that some employees have expressed concern about potential public health risks associated with the collection and testing process in the current environment. Employers should review the applicable DOT Agency requirements for testing to determine whether flexibilities allow for collection and testing at a later date.
- As a reminder, it is the employer’s responsibility to evaluate the circumstances of the employee’s refusal to test and determine whether or not the employee’s actions should be considered a refusal as per 49 CFR § 40.355(i). However, as the COVID 19 outbreak poses a novel public health risk, DOT asks employers to be sensitive to employees who indicate they are not comfortable or are afraid to go to clinics or collection sites. DOT asks employers to verify with the clinic or collection site that it has taken the necessary precautions to minimize the risk of exposure to COVID 19.
- Employers should revisit back-up plans to ensure the plans are current and effective for the current outbreak conditions. For example, these plans should include availability of collectors and collection sites and BAT, and alternate/back-up MRO, as these may have changed as a result of the national emergency. Employers should also have regular communications with service agents regarding the service agent’s availability and capability to support your DOT drug and alcohol testing program.

For DOT-Regulated Employees:

- If you are experiencing COVID 19-related symptoms, you should contact your medical provider and, if necessary, let your employer know about your availability to perform work.
- If you have COVID 19-related concerns about testing, you should discuss them with your employer.
- As a reminder, it is the employer’s responsibility to evaluate the circumstances of the employee’s refusal to test and determine whether or not the employee’s actions should be considered a refusal as per 49 CFR § 40.355(i).

Drug & Alcohol Testing Compliance During COVID 19 Emergency *(Continued from Page 7)*

For Service Agents:

- As a collector, BAT, laboratory, MRO, or SAP, you should continue to provide services to DOT-regulated employers if it is possible to do so in accordance with State or local mandates related to COVID 19. Should you have concerns about COVID 19 when testing or interacting with employees, please follow your company policy,

directions from State and local officials, and guidance from the Centers for Disease Control and Prevention (CDC).

You are encouraged to continue to monitor guidance from public health officials and to refer to official government channels for additional information related to COVID 19.

CALENDAR

All in-person courses are indefinitely suspended. Please visit the NHRTAP webpage for online resources and updates.

<https://www.newhampshirertap.com/training>

You may also check out National RTAP's website for resources and online learning courses.

<https://www.nationalrtap.org/Home>

NHRTAP staff is currently working to schedule trainings for July—December 2020 (pending approval). Additional 2020 trainings will be added to the website shortly, so please check back for the most updated list:

<http://newhampshirertap.com/Calendar>

Contact Julie Schafer at jschafer@rlsandassoc.com or (937) 299-5007 with any training needs, questions, and/or requests.

If you are not receiving this newsletter directly, or know of someone who is not currently receiving it, and would like to, please contact Julie Schafer (jschafer@rlsandassoc.com). This publication is free.

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