

## Application for Motor Common Carrier of Persons in Paratransit Service

THIS APPLICATION IS TO BE USED FOR COMMON CARRIER PASSENGER SERVICE WHEN PROVIDING TRANSPORTATION ON A NONEXCLUSIVE, ADVANCE RESERVATION BASIS.

1. **Legal Name of Applicant** (Individual, Partnership or Corporation)

Humane Care Transportation Service LLC

- If you are an individual who has not formed any type of corporate entity, you should enter your name **as it will appear on your Insurance documents**.
- If you are filing for a partnership, but **not a limited liability partnership**, the names of all partners must be entered on this line. Those names should be entered **as they will appear on your Insurance documents**. This includes husbands and wives filing jointly.
- If you are filing for a corporate entity (corporation, limited liability company, or limited liability partnership), **even if you are the sole shareholder member**, you must enter the name **exactly as it appears on the registration papers from the Corporation Bureau of the Pennsylvania Department of State**.

2. **Trade Name** (Attach a copy of fictitious name registration if applicable) **Please see attached**

This is any name which you will be operating under which differs from the **LEGAL NAME OF APPLICANT**. A **TRADE NAME** is considered a **FICTITIOUS NAME** if the identity of the applicant cannot be readily determined. *EXAMPLE: John Doe is the applicant and wants to use the name "Johnboy Vans" as his trade name. People cannot readily determine that John Doe is the actual operator; therefore, the name is fictitious and must be registered as such. Trade names such as "John Doe Vans" or "J. Doe Vans" are not considered fictitious and would not have to be registered.*

3. **Do you currently hold PUC Authority?**  **NO** **Previous Authority?**  **NO**

**If YES, at PUC No. A-** \_\_\_\_\_

4. **Are you a business entity registered with the PA Dept. of State?**  **NO**

If NO, you must register (see checklist on how to register)

**If YES, provide your PA Corporation Bureau Entity ID Number** 0014678928

(See checklist and indicate type of business entity registered)

DATE OF DEPOSIT

AUG 26 2025

5. **If either a corporation or limited liability company, please list members (LLC) or shareholders and officers (corporation).**

Mark Tay  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. **Mailing Address**

605 Raikes Road  
Street Address  
\_\_\_\_\_  
Huntingdon Valley PA 19006  
City, State and Zip Code County  
\_\_\_\_\_  
Telephone Number E-mail Address  
\_\_\_\_\_

*This is the e-mail address to which the Commission will send all official documents issued by the Commission until further notice.*

7. **Physical Address** (If different than mailing address. Do not use a post office box.)

2615 Philmont Avenue  
Street Address  
\_\_\_\_\_  
Huntingdon Valley PA 19006 Montgomery  
City, State and Zip Code County  
\_\_\_\_\_  
267 321 9939 humanecarellc@gmail.com.  
Telephone Number E-mail Address  
\_\_\_\_\_

The address entered here should reflect the actual location of the business. This is the address the Commission needs in order to dispatch Enforcement Officers to inspect equipment. If left blank, it will be assumed that the **PHYSICAL ADDRESS** is the same as the **MAILING ADDRESS**

8. **Attorney** (if applicable)

\_\_\_\_\_  
Attorney's Name & Telephone Number for this Filing  
\_\_\_\_\_  
Attorney's Address E-mail Address  
\_\_\_\_\_

An attorney's name should only be entered if an attorney is filing the application for a client and the application is being sent under the attorney's cover letter.

9. **Does applicant have a USDOT Number?**

\_\_\_\_ No  Yes, at No. 4452235

10. **Describe the service area proposed by this application.**  
(Use the space below or attach additional sheet if space provided is not sufficient).

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Adams, Bucks, Chester, Dauphin, Delaware, Philadelphia, Montgomery, Lancaster, Lebanon, Bulter, Allegheny, Blair, Erie

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*Examples:*

- *To transport people whose personal convictions prevent them from owning or operating motor vehicles from points in Lancaster County to points in PA, and return.*
- *To transport people from the city and county of Philadelphia to correctional facilities in PA, and return.*
- *To transport people in wheelchair and stretcher vans from points in the city of Pittsburgh to points in Allegheny County, and return.*
- *To transport people between points in Northumberland County.*

11. **Certification:**

Applicant certifies that it is not now engaged in unauthorized intrastate transportation for compensation between points in Pennsylvania and will not engage in said transportation unless and until authorization is received from the Pennsylvania Public Utility Commission.    Yes

Applicant further certifies that it understands the requirements of the Pennsylvania Public Utility Commission, especially as they relate to safety and insurance and that it may be subject to civil penalties, suspension or cancellation of the Certificate for failure to comply with Commission requirements.    Yes

Applicant further certifies that it understands that it is subject to an annual assessment based upon its reported gross Pennsylvania intrastate revenues; said assessment to help defray expenses incurred in regulating Motor Common Carriers of Persons in Paratransit Service; and acknowledges that failure to report revenue and pay its annual assessment may result in civil penalties, suspension or cancellation of the certificate.    Yes

**Verification of Application**

I/We hereby state that the statement(s) made in this application is/are true and correct to the best of my/our knowledge and belief.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Mark Tay  
\_\_\_\_\_  
(Print Name)

Mark Tay (Signature)  08/22/2025  
\_\_\_\_\_  
(Date)

The verification of the application must be completed by the applicant appearing on Line 1 of the application by the named individual, all partners if a partnership, a member (if a limited liability company), or by the President or Secretary (if a corporation).

**DATE OF DEPOSIT**

**AUG 26 2025**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

# VERIFIED STATEMENT OF APPLICANT

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THE APPLICANT'S FITNESS TO OPERATE. STATEMENTS SHOULD BE TYPED OR PRINTED. ILLEGIBLE STATEMENTS WILL DELAY YOUR APPLICATION.

Humane Care Transportation Service LLC

Legal Name of Applicant

Trade Name, if any

2615 Philmont Ave	Huntingdon Valley	PA	19006
Street Address (principal place of business)	City or Municipality	State	Zip Code

The Verified Statement of the Applicant factual details about your proposed transportation service. Your Verified Statement must answer all of the items listed below and on the following pages. Provide as much information as possible to prevent delay in processing your application. If you need more space to provide your answer, please attach additional pages identifying the appropriate item number.

1. Identify the person making the Verified Statement on behalf of the applicant. If an employee/officer of applicant is making the statement, give name, title, business address and telephone number.

Mark Tay  
Owner/Administrator  
2615 Philmont Ave  
Huntingdon Valley PA 19006  
267 321 9939

2. List the applicant's affiliation (owner, manager, controls) with any other carrier, with the description of affiliation.

None

3. Describe the applicant's business experience, particularly any experience relating to the operation of a transportation service. If practical experience is lacking, please provide an explanation and description of any education or training that you believe may be relevant.

Please see attached

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4. Describe your facilities, record maintenance plan and your communication network. Please include a description of your physical location, to including office machines that will be utilized, and the facility to house vehicles. As a carrier of household goods in use, applicant should include a description of storage facilities, if applicable. Please include an explanation of your plan to maintain records required by the PUC, as well as normal business records. In regard to your communication network, please explain how you will receive customer requests for transportation, how you will dispatch the vehicles to fulfill the request, and how you will maintain continuous communication with your drivers.

Please see attached

5. Please state the number of drivers you intend to use or hire in your business and explain why that number of drivers is appropriate for the size of the territory you will be serving. In addition, please explain:
- Your hiring standards for drivers;
  - Your system for conducting criminal background checks;
  - Your driver training program;
  - Your system for conducting driver license checks;
  - Your policies regarding alcohol and drug use by your drivers.

I intend to invest in a fleet of eight (8) drivers, with the flexibility to adjust the number based on contract terms and the specific coverage areas

Please see attached the responses for a-e.

6. Please state the number of vehicles you plan to use in your business and why that number is appropriate to provide reasonable and efficient service to the territory you will be serving. If you have already obtained vehicles for your business, please list them in the chart below.

<b>YEAR</b>	<b>MAKE</b>	<b>MODEL</b>	<b>SEATING CAPACITY*</b>	<b>VEHICLE ID #</b>	<b>MILEAGE</b>
2014	Ford	STA	6	1FDEE3FLXEDA60504	102,000

\*Vehicles with seating capacity of more than 15 passengers, including driver, can't be used in paratransit service.

7. Describe your vehicle safety program. Please include the following in your explanation:
  - a. Your periodic vehicle maintenance plan
  - b. Your system for ensuring your vehicles will continuously comply with applicable Pennsylvania vehicle equipment standards (67 Pa. Code, Chapter 175).

Please see attached

8. Please explain what steps you have taken to determine if you can obtain insurance and pay the required insurance premiums.

We currently have an insurance agent who handles our coverage - PROGRESSIVE COMMERCIAL INSURANCE AND CURRENT HOMECARE AGENCY LIABILITY COVERAGE. BROKER IN PROGRESS OF EXECUTION.

9. State whether the applicant has been convicted of a misdemeanor or felony. If applicant is partnership, limited liability partnership, corporation, or limited liability company this question applies to all members, officers, and/or shareholders. If "YES", explain.

\_\_\_\_\_ YES      x   NO

10. Financial Data. Complete the "Statement of Financial Position", which follows this page. Please feel free to also provide additional information explaining why you believe you have sufficient funds to ensure your transportation business can provide reliable service to the public in a safe manner.

SEE ATTACHED.

### Verification of Statement

The undersigned deposes and says that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information, and belief. The undersigned understands that false statements herein are made subject to penalties of 18 Pa. C. S. Section 4904 relating to unsworn falsification to authorities.

Mark Tay (Signature)

Mark Tay, Owner/Administrator  
(Name and Title, printed or typed)

08/22/2025  
(Date)

DATE OF DEPOSIT



**Pennsylvania Department of State**  
Bureau of Corporations and Charitable Organizations  
PO Box 8722 | Harrisburg, PA 17105-8722  
T: 717.787.1057  
[dos.pa.gov/BusinessCharities](https://dos.pa.gov/BusinessCharities)

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August 12, 2025

HUMANE CARE TRANSPORTATION SERVICE LLC  
MARK TAY  
2615 PHILMONT AVE  
HUNTINGDON VALLEY, PA 19006-5301

**Entity Name:** HUMANE CARE TRANSPORTATION SERVICE LLC  
**Entity File Date:** July 29, 2025  
**Entity Number:** 0014678928  
**Filing Type:** Domestic Limited Liability Company

The Bureau of Corporations and Charitable Organizations is happy to send your filed document. The Bureau is here to serve you and we would like to thank you for doing business in Pennsylvania.

Thank you for registering with the Department of State to do business in Pennsylvania. Like many other businesses, you may have employees, sell taxable products, or provide a taxable service to consumers in Pennsylvania. Please visit [www.pa100.state.pa.us](http://www.pa100.state.pa.us) to register for business taxes with the Department of Revenue and the Department of Labor and Industry. You may also visit [www.Business.pa.gov](http://www.Business.pa.gov) to find resources for businesses through all stages of development.

Beginning in 2025, annual reports are required for all domestic filing entities, limited liability general partnerships and registered foreign associations. More information will be forthcoming from the Bureau. However, to ensure that you receive notice of how and when to make annual reports, keep all information on file with the Bureau up-to-date, particularly registered office address.

**PENNSYLVANIA DEPARTMENT OF STATE  
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**

Entity# : 6361684  
Date Filed : 02/22/2016  
Effective Date : 02/26/2016  
Pedro A. Cortés  
Secretary of the Commonwealth

**Certificate of Organization Domestic Limited Liability Company**  
(15 Pa.C.S. § 8913)

Name <b>MARK TAY</b>		
Address <b>3040 WILLITS ROAD, PENNSYLVANIA</b>		
City <b>PHILADELPHIA</b>	State <b>PA</b>	Zip Code <b>19136</b>

Document will be returned to the name and address you enter to the left.

**DATE OF DEPOSIT**

**AUG 26 2025**

Fee: \$125.00

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SECRETARY'S BUREAU

In compliance with the requirements of 15 Pa.C.S. § 8913 (relating to certificate of organization), the undersigned desiring to organize a limited liability company, hereby certifies that:

1. The name of the limited liability company (designator is required, i.e., "company", "limited" or "limited liability company" or abbreviation):

**HUMANE HOMECARE AGENCY Limited Liability Company**

2. The (a) address of the limited liability company's initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and Street	City	State	Zip	County
<b>3040 WILLITS ROAD, PHILADELPHIA</b>	<b>PHILADELPHI A</b>	<b>PA</b>	<b>19136</b>	<b>Philadelphia</b>

(b) Name of Commercial Registered Office Provider County

c/o:

3. The name and address, including street and number, if any, of each organizer is (all organizers must sign on page 2):

Name	Address
<b>HUAMANE HOMECARE AGENCY</b>	<b>3040 WILLITS ROAD , PHILADELPHIA , PHILADELPHIA , Philadelphia , PA , United States , 19136</b>

4. *Strike out if inapplicable term*

~~A member's interest in the company is to be evidenced by a certificate of membership interest.~~

5. *Strike out if inapplicable term*

~~Management of the company is vested in a manager or managers.~~

6. The specified effective date, if any 02/26/2016 12:00 AM

is: (month date year hour, if any)

month date year hour, if any

7. *Strike out if inapplicable: The company is a restricted professional company organized to render the following restricted professional service(s):*

8. For additional provisions of the certificate, if any, attach an 8 1/2 x 11 sheet.

IN TESTIMONY WHEREOF, the organizer(s) has  
(have) signed this Certificate of Organization this  
22 day of February, 2016.

HUAMANE HOMECARE AGENCY

MARK TAY

Signature

**Statement of Financial Position (Balance Sheet)**

**As of (date) June 30, 2025**

(Must be less than 6 months old)

**ASSETS**

Current Assets

Cash \$15,000

Other Current Assets (specify) \$23,000

**Total Current Assets \$38,000**

Tangible Assets

Motor Vehicle Equipment \$25,700

Property (buildings, land, etc.) \$25,700

Office Equipment

**TOTAL ASSETS \$63,700**

**LIABILITIES**

Current Liabilities (Due within one year of date)

Loans

Credit cards/ revolving credit \$2,000

Other Liabilities (Attach schedule)

**Total Current Liabilities \$2,000**

Long Term Liabilities (Due after one year of date)

Mortgage

Long term commercial loan

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Other Liabilities (Attach Schedule)

Total Long-Term Liabilities

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**TOTAL LIABILITIES \$2,000**

Equity \$61,700

**\$63,700**

## Statement of Financial Position continued

### Operational Funding (Years 1-3)

Humane Care Transport LLC's operational expenditures for the initial **three-year period will be fully capitalized by its parent company, Humane HomeCare Agency LLC**. Based on the estimated annual Operational Expense, the total funding required for this period is **\$975,000** ( $\$325,000 \times 3$ ). This guaranteed funding provides a stable financial foundation, ensuring the company can meet all operational needs, maintain its commitment to safety, and scale its services effectively from day one without financial constraints.

*\*In addition to the funding mentioned above, Humane Care Transportation LLC is expected to receive a projected monthly income of \$25,000.*

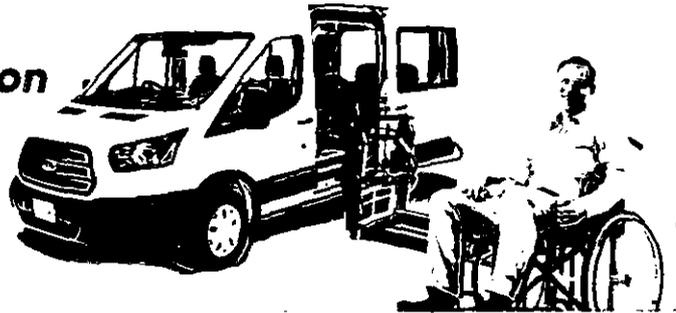
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## HUMANE CARE TRANSPORTATION SERVICES LLC

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*Humane Care Transportation Service*

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**ADDENDUM: APPLICATION QUESTIONS (QUESTION 3, 4, 5, 7)**

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**HUMANE CARE TRANSPORTATION SERVICES LLC**  
(ANSWERS TO ALL OTHER QUESTIONS HAVE BEEN DIRECTLY ADDRESSED ON ATTACHED APPLICATION)

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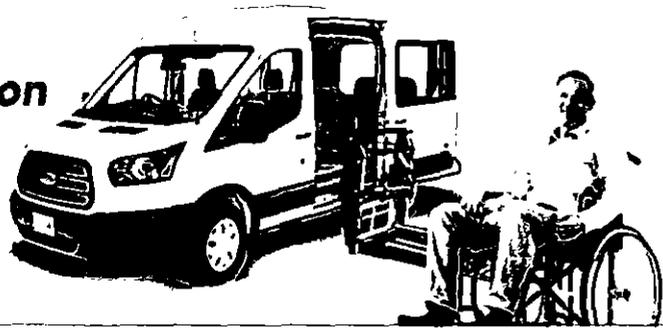
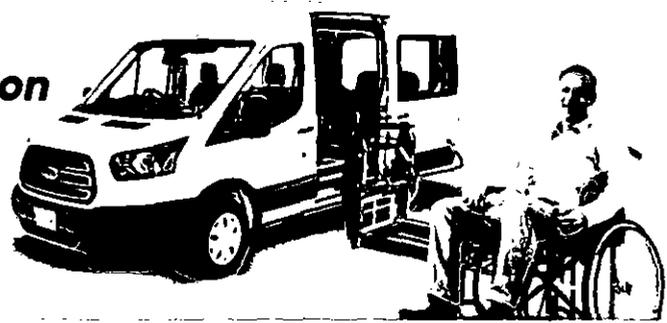


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### **Q3. Verified Statement of Applicant's Business Experience & Educational Background**

I am a seasoned entrepreneur with a robust academic and professional background. I hold a Bachelor's Degree in Business Administration with a concentration in Finance from Temple University, complemented by a certification in Business Administration with a focus on Logistics from the Ghana Institute of Management and Public Administration (GIMPA). This unique blend of financial/business acumen and logistical expertise forms the foundation of my leadership.

#### **Operational Leadership and Expertise in Client-Centric Services**

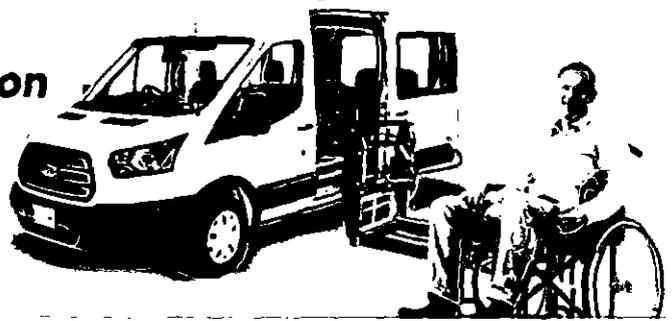
For nearly a decade, I have served as the sole owner and administrator of **Humane HomeCare Agency LLC**, a Pennsylvania-registered entity specializing in client-centric care. In this executive capacity, I have been directly responsible for the full scope of business operations, with a particular emphasis on managing a complex, on-demand transportation service for our clients. This extensive experience has provided me with a granular understanding of the critical nature of reliable, timely, and secure transport for individuals with specific needs. My tenure has been defined by my ability to build and sustain a transportation system that is not only operationally efficient but also deeply attuned to the requirements of a vulnerable population.

#### **In-Depth Regional Knowledge and Strategic Vision**

My hands-on experience has cultivated an intimate and comprehensive knowledge of the operating region, which includes Adams, Bucks, Chester, Dauphin, Delaware, Franklin, Juniata, Lancaster, Perry, Philadelphia, and York counties. This detailed understanding of the geographic

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landscape and the unique demographic and logistical challenges within these communities is a substantial competitive advantage. It allows me to apply a strategic, data-driven approach to route optimization and service delivery, ensuring that our transportation solutions are maximally effective and responsive to local needs. This regional expertise is a critical asset that will enable us to navigate the complexities of paratransit services with precision and foresight.

My proven track record in executive management, coupled with my specialized knowledge in logistics and extensive operational experience in a closely related client-focused sector, provides a strong and verifiable foundation for my application. I am confident that my strategic vision and commitment to excellence align perfectly with the mission at hand. My expertise will ensure the new venture not only meets but exceeds the high standards of safety, reliability, and care required by the Public Utility Commission and the community we serve.

### **Q4. Facilities, Records, and Communication Plan**

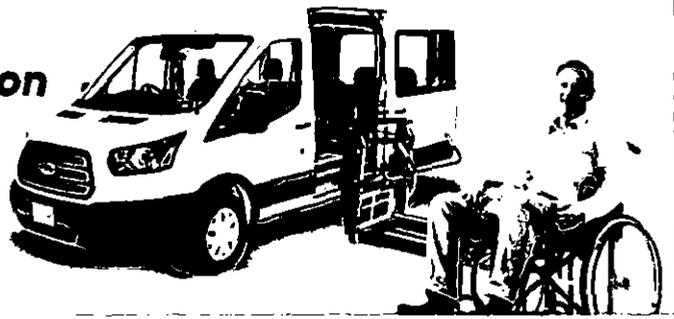
Our primary business location, which includes both our main office and a secure parking facility for our vehicles, is at **2615 Philmont Avenue, Huntingdon Valley, PA 19006**. The office is fully equipped with essential business machines, including computers with our dispatch and record management software, printers, scanners, and dedicated business phone lines. High-speed internet ensures continuous connectivity for all our operations. Our location features secure, on-site storage within the building and in designated areas of the facility.

All vehicles for **Humane Care Transport LLC** will be housed at a secure, privately-owned lot on the same premises. This facility provides a safe and protected environment for our fleet, ensuring vehicles are ready for dispatch at all times. As we will not be a carrier of household goods, there is no need for separate storage facilities.

### **Record Maintenance Plan**

**Humane Care Transportation Service**

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We have a robust plan to maintain all records in full compliance with Pennsylvania Public Utility Commission (PUC) requirements and for efficient business management. We will utilize a dual-system approach with both digital and physical records.

- **Digital Records:** We will use a secure, cloud-based software system for all digital records, including customer information, service requests, transportation logs, billing details, vehicle maintenance history, driver files, and financial records. This system is protected by two-factor authentication (2FA) and end-to-end encryption to ensure the confidentiality and integrity of all data. Access to these records is strictly limited to authorized personnel, with individual user permissions configured on a need-to-know basis. Additionally, a robust backup protocol is in place to prevent any data loss and ensure business continuity.
- **Physical Records:** In full compliance with Pennsylvania PUC requirements, all original and hard copy documents, including contracts and compliance-related paperwork, will be maintained in a secure, locked filing cabinet. This cabinet is located within a restricted-access office area, with physical keys and access limited exclusively to authorized management personnel. To ensure a clear audit trail, a document sign-out log will be utilized to track the removal and return of all sensitive files. Furthermore, obsolete or sensitive documents will be disposed of securely through a cross-cut shredding process to prevent any unauthorized retrieval of information.

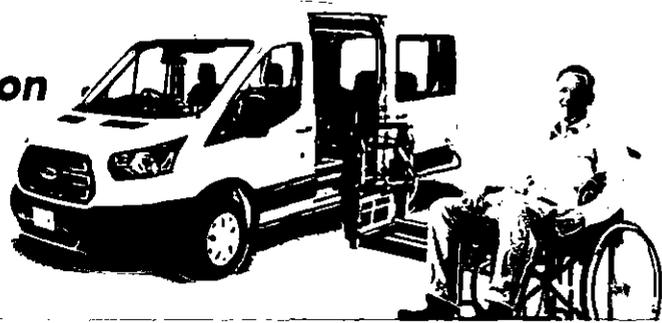
### **Communication Network**

Our communication network is designed for seamless, real-time coordination to ensure a high level of service and driver safety.

- **Customer Requests:** Customers will be able to request transportation services through a dedicated business phone line, a monitored email address for non-urgent requests, and a secure online portal for scheduling. In addition to a dedicated business phone line and a monitored email address for non-urgent requests, we will implement a secure online

**Humane Care Transportation Service**

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portal. This portal will give customers the flexibility to submit, schedule, and track transportation requests in real time. The system will be designed with a user-friendly interface, ensuring a seamless experience for all clients. Requests submitted through any of these channels will be immediately routed to our dispatch system for prompt. When a request is received, our dispatch manager will:

- Identify the closest available vehicle to the pickup location.
- Analyze traffic and route conditions to provide the most efficient travel plan.
- Assign the trip to the appropriate driver through their in-vehicle mobile device.
- **Dispatching:** Our dispatch process is managed through a centralized, GPS-enabled software system. When a request is received, our dispatcher will identify the closest available vehicle and assign the trip to the driver via their in-vehicle mobile device.
- **Driver Communication:** We maintain continuous communication with our drivers through company-issued smartphones or tablets. These devices run a dedicated application for two-way communication with the dispatch office. All vehicles are equipped with GPS tracking, which allows us to monitor location, status, and progress in real-time, enabling quick responses to any unforeseen circumstances or emergencies.

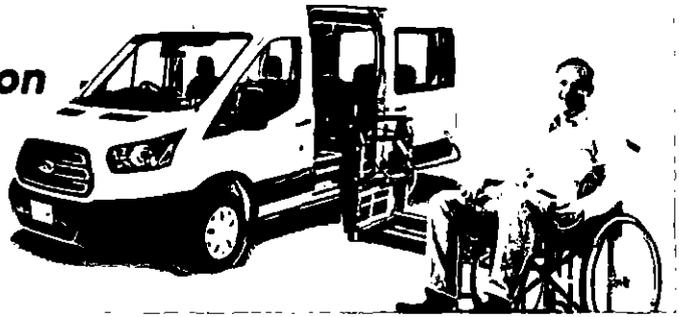
### **Record Maintenance Plan**

We have a comprehensive plan for maintaining all records as required by the Public Utility Commission (PUC) and for general business operations. Our record-keeping system will be both digital and physical to ensure data integrity and accessibility.

- **Digital Records:** We will utilize a secure, cloud-based software system to maintain digital records. This includes:
  - **Customer Information:** Service requests, transportation logs, and billing details.

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- **Vehicle Maintenance:** Service history, inspection reports, and repair logs for each vehicle.
- **Driver Files:** Licenses, certifications, and training records.
- **Financial Records:** Invoices, payment receipts, and expense reports.
- **Compliance Documents:** All records required by the PUC will be stored digitally with a secure backup to prevent data loss.
- **Physical Records:** In full compliance with Pennsylvania PUC requirements, all original and hard copy documents will be maintained in a secure, **locked filing cabinet** within our main office. These documents will include contracts, financial statements, and all other compliance-related paperwork. This dual-system approach guarantees data integrity, security, and easy retrieval for audits or operational needs.

### **Q5. Driver Hiring, Training and Policies**

HUMANE CARE TRANSPORTATION SERVICES LLC prioritizes drivers' skills, experience, and attitude when selecting candidates. An important area in this process is to establish qualification standards for new employees and existing employees who have driving duties. To enforce these standards, HUMANE CARE TRANSPORTATION SERVICES LLC has implemented the following driver qualification procedures.

#### **1. Driver Age Requirements**

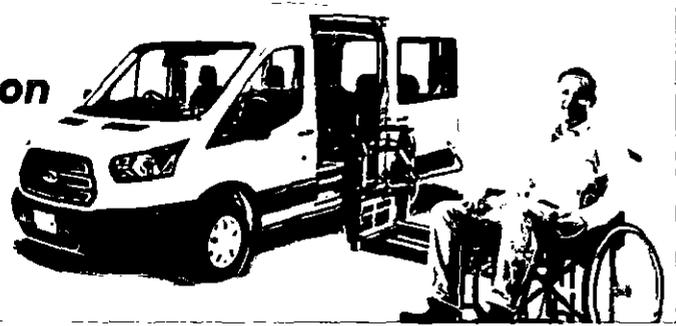
Minimum age is 23 years old.

#### **2. Application for Employment**

All driver applicants must fill out an Employment Application and Driving Position Supplement with all required information about driving roles. HUMANE CARE TRANSPORTATION SERVICES LLC hiring standards also require that driver applicants

**Humane Care Transportation Service**

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list all former employers for the past 10 years. All periods of unemployment must be thoroughly explained in the application.

**3. License:** HUMANE CARE TRANSPORTATION SERVICES LLC will obtain a legible copy of the license of all driver applicants. A review of the license will be conducted to be certain if it is valid, has not expired, and is appropriate for the class of vehicles in which driving is required.

Whenever driving HUMANE CARE TRANSPORTATION SERVICES LLC vehicles or operating their personal vehicle for company business, employees must have in their possession a valid driver's license. Employees will notify their supervisor if their license is suspended, revoked, or expired.

Employees who drive HUMANE CARE TRANSPORTATION SERVICES LLC will comply with the D.O.T. requirements for medical examinations and license renewal

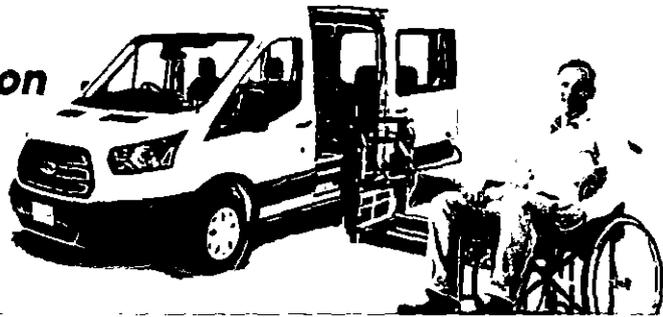
Supervisors must regularly verify that all vehicle operators have the required license class and a valid medical card.

### **4. MVR Check and Evaluation**

Humane Care Transportation Services LLC will request an MVR for driver applicants being considered for employment in which driving entity vehicles or operating their own vehicle for entity business will be required. An MVR will be requested from every state the applicant has lived in during the past 5 years. Copies from the applicant will not be accepted. The Safety/Loss Control Officer will review all MVR information to determine if the driver applicant meets the qualification standards regarding driving records. The driver's MVR will be formally reviewed annually, or more often if needed, to ensure qualification standards are met. MVRs are personal and confidential and should only be discussed with the driver or other people authorized to know. The Safety/Loss Control Officer will receive the results of the MVR check, and any needed corrective action will be applied promptly.

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**5. Driver Qualification Standards** To ensure that potential new and existing drivers meet HUMANE CARE SERVICES qualification standards for motor vehicle records outlined in the Commercial Van Safety Program, the following policies have been instituted regarding:

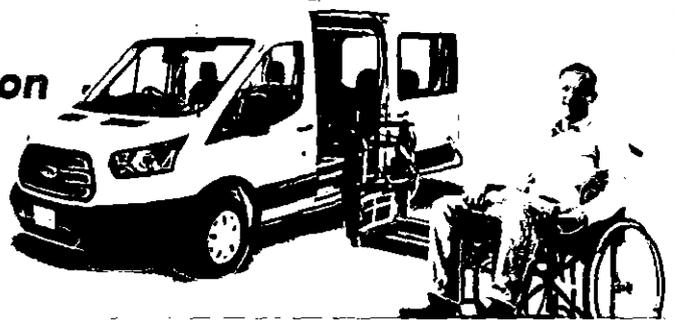
1. Actions taken based on the number of points and violations shown from the MVR checks and evaluations.
2. Standards and penalties for drivers involved in preventable accidents. HUMANE CARE TRANSPORTATION SERVICES LLC has established a point structure system to evaluate potential new and current driver motor vehicle records. If a driver meets or exceeds (8) points total within the previous (3) years or exhibits a pattern of continued violations, he/she will not be eligible to drive a/an) HUMANE CARE TRANSPORTATION SERVICES LLC vehicle. If the MVR reveals (6 points), then the driver must complete a state-approved driver program to reduce the points before being hired. No potential new or existing driver will not be allowed to drive (a/an) HUMANE CARE TRANSPORTATION SERVICES LLC vehicle or other vehicle on HUMANE CARE TRANSPORTATION SERVICES LLC business if there MVR reveals: (Hit and Run, Felony, Homicide, Manslaughter involving a motor vehicle or DUI) the applicant or current employee will be disqualified from driving for the company. Each employee or applicant involved in a preventable, at fault vehicular accident, whether it involves the public or not, will be required to: (Supply the police report for said accident) An employee who receives any moving violation must notify his/her supervisor of the incident by the close of business on the day he receives the violation. Any corrective action will be evaluated based on the type and severity of the incident.

### **6. Investigation of Previous Employment**

HUMANE CARE TRANSPORTATION SERVICES LLC will contact all former and current employers of the driver applicant for the previous (3) years to verify as much of the following information as possible using the D.O.T. Safety Performance History Records Request form (391.23)

- Dates of employment

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- Type of work performed
- Type of vehicle(s) operated
- Extent of driving experience
- Vehicle accident record
- Overall work history and performance. All former and current employer information gathered from the inquiries must be in writing and will be retained in the driver's (if hired) qualification file. In the event a former or current employer refuses to release information, a note stating this will be placed in the file. The Safety/ Loss Control Officer will review all former and current employer information to determine if the driver applicant meets the hiring standards regarding past and current employment, and to determine if the applicant was truthful about information listed on the employment application.

### **7. Driver Performance**

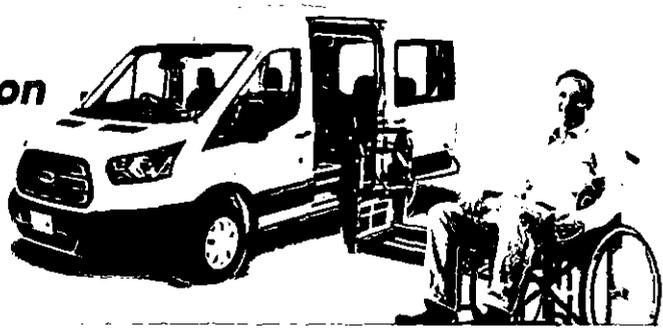
All driver applicants for HUMANE CARE TRANSPORTATION SERVICES LLC must pass a road test by a qualified examiner before employment is offered. The road test examination shall be performed in the type of vehicle the driver will operate. Performance will be monitored during the selection process as well as at periodic intervals throughout the driver's career using information obtained from motor vehicle records and file data.

### **8. Driver Qualification File**

The driver selection process includes developing a driver qualification file. Elements of this file will include such items as:

- Employment Application
- Copy of Driver's License
- MVR checks (original stays in the file for the duration)
- Copy of Current Medical card
- Prior Employer Safety Performance History Records Request (past 3 years)
- Certification of Compliance of 29
- OBTAIN A PENNSYLVANIA STATE POLICE CRIMINAL HISTORY ( patch)
- Driver Statement of Duty Hours & Other Compensated Work
- Drug & Alcohol Records Request (previous employer)

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- Post-Accident Testing Procedure
- Driver Authorization (Release of Post-Accident documents)
- Driver Drug Screen Consent Form
- Employee's Previous Alcohol and Drug Testing Statement
- Three Years of Annual Driver Reviews
- Request for Check of Driving Record
- Entry Level Driver Training documentation (drivers with less than 3 years driving experience; minimum driving experience: 2 years)
- Receipt of driver handbook
- Receipt of Drug Company Policy
- Map reading training: HUMANE CARE TRANSPORTATION SERVICES LLC will conduct a map-reading training for all new Drivers. At the end of the training, Drivers will take a test.

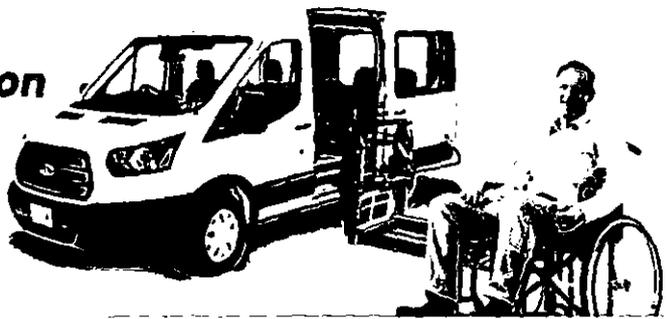
### Driver Training and Reviews

HUMANE CARE SERVICES' goal is to have a process in place to hire only qualified and safe drivers. Once on board, HUMANE CARE TRANSPORTATION SERVICES LLC is committed to retaining these drivers. To keep drivers and supervisors well-trained and informed, HUMANE CARE TRANSPORTATION SERVICES LLC has instituted several policies regarding driver training. These policies include driver orientation, periodic driver meetings, and driver performance evaluation and reviews.

**1. Driver Orientation:** HUMANE CARE TRANSPORTATION SERVICES LLC has an orientation program that all new drivers are required to complete. The orientation program consists of comprehensive classroom training that will cover a variety of subjects. Among the topics are established driving policies and procedures, regulatory compliance, vehicle maintenance and inspections, accident reporting procedures, wheelchair securement, CPR, and defensive driving procedures. After completing the classroom portion of the orientation, all new drivers will be assigned to a driver trainer. The purpose is to evaluate the new employee's overall driving skills and techniques, and to apply what has been learned in the classroom to an actual

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job situation. This period should be dedicated to ensuring the new driver is acquainted with documentation related to vehicle maintenance and inspections, as well as addressing any outstanding questions or concerns not covered during classroom training.

**2. Driver Meetings:** Every Month, a driver's meeting will be conducted by driver supervisors. These meetings between supervisors and drivers are held to share news and information, and to give our drivers a forum to discuss issues, questions, or concerns. All drivers are expected to participate in these meetings, and all driver input is welcome and appreciated.

**3. Driver Evaluation and Performance:** Reviews. Driver supervisors are required to perform a formal, structured performance evaluation with each driver at least once every 12 months. HUMANE CARE TRANSPORTATION SERVICES LLC drivers need to understand that their performance will be evaluated on an ongoing basis, and they may request, or their supervisor may recommend, a review at any time. However, all drivers will receive periodically structured reviews of their individual performance.

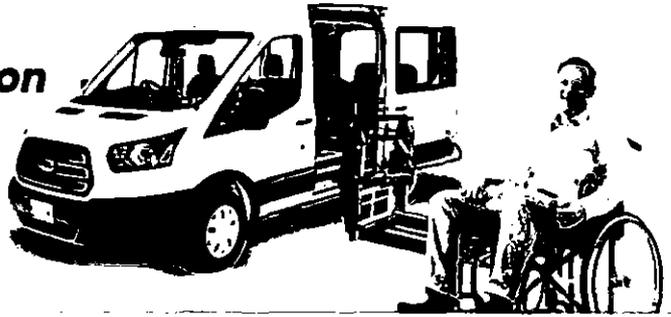
**4. On Road Performance Evaluation:** The on-road evaluation is conducted by the supervisor to monitor the performance of current drivers by riding with them or following them. The supervisor should document the results and counsel drivers concerning problems or deficiencies that were observed. Also, all HUMANE CARE TRANSPORTATION SERVICES LLC vans are equipped with a live video camera, which allows the supervisor to record from his office the Driver's performance. Those are the best ways for the supervisor to ensure that the driver is following the proper vehicle inspection and defensive driving procedures.

**5. Performance Review:** Conduct driver reviews privately, away from the operating area. The review is considered the driver's time, and interruptions should not be allowed. The actual driver performance review should cover, but is not limited to, five basic areas. These are:

- a. Evaluating the driver's performance against company standards, particularly for safe wheelchair security.
- b. Recognition of the driver's contributions and accomplishments.
- c. Correction of any new or existing performance problems.

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- d. Establishment of goals or standards for the next review period.
- e. Review of Driver's MVR

Once the driver and his/her supervisor have concluded their discussion of past performance, addressed any development, training, or corrective action needs, and have established new goals and standards for the future, they are expected to reach mutual agreement and wrap up the review. The wrap-up should include the following:

- a. A concise summary of the performance review discussion with all agreed plans and goals.
  - b. An opportunity for the driver to react, ask questions, and give additional ideas and suggestions.
  - c. A sincere and meaningful expression of appreciation for the driver's participation, time, and efforts.
  - d. A written record of what was discussed, agreed upon, and corrective action/training plans.
- 6. Recordkeeping:** Copies of performance reviews and MVR checks are to be provided to the driver, supervisor's manager, and filed in the driver's personnel records.

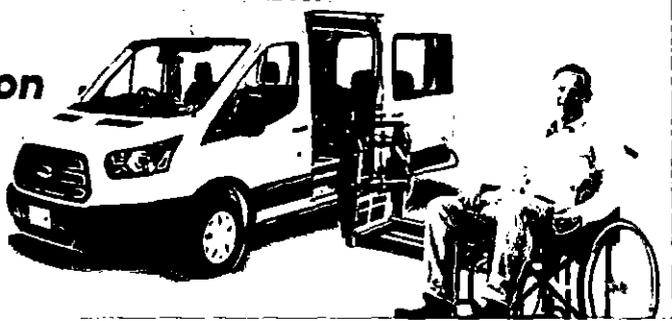
### **Accident Investigation**

HUMANE CARE TRANSPORTATION SERVICES LLC will investigate all vehicle accidents involving its employees and vehicles. All incidents, regardless of severity, must be reported immediately. Minor property-only accidents are handled by the driver and supervisor. The Safety/Loss Control Officer oversees investigations involving serious damage, injury, death, or third parties. Management may conduct additional investigations as needed.

1. **Accident Investigators.** At the scene, the accident investigator(s) will carefully survey the scene, noting the position of any debris from the accident. The investigator(s) should take photos of the scene, with careful notes of what the photos depict. A map of the site should be drawn to scale, with any landmarks near the scene noted as to position. Photograph all damage to vehicles and property from multiple angles and document thorough notes. The more accurate the information provided is, the easier it is when it comes to canvassing the accident scene. The

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accident investigator(s) must be as objective as possible in gathering and evaluating data from the accident scene.

**2. Driver Responsibility** in Accident Investigation Certain driver responsibilities must be carried out at the scene of an accident. Two main concerns at the scene of an accident are to deal with immediate problems and to gather and report pertinent accident information promptly. These two items can be broken down into a 6-step accident procedure for drivers to follow.

### **Step 1: Stop, stay calm**

**Step 2: Turn on your emergency flashers** as an immediate warning signal. Then do a quick evaluation of accident victims, if any, and assist. Next, we set out emergency warning devices on the roadway.

**Step 3: Either contact local law enforcement** personnel and your supervisor yourself or arrange to have someone do it for you. Be courteous and cooperative when providing information to authorities. Never admit guilt or liability at the scene of an accident. Never leave the scene of an accident.

**Step 4: Write down names**, license numbers, and other information regarding the accident and those people involved in it. Draw a simple diagram of the accident scene. The more detail you can provide, the better it will be for insurance and/or legal purposes later. If you have a camera for use at the accident scene, document the situation with photographs from various angles. (Once the police arrive, they most likely will not allow the exchange of information)

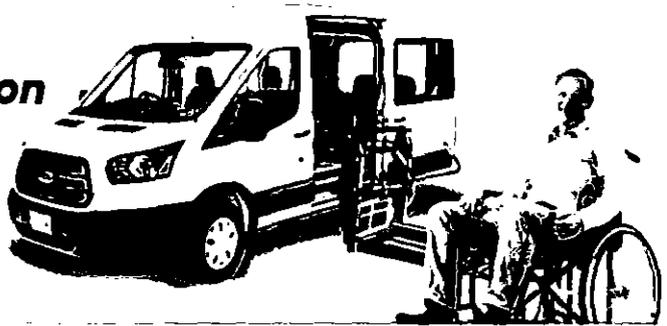
**Step 5:** After the vehicle has been secured, warning devices put in place, assistance rendered to injured person(s) (if any), and law enforcement personnel contacted, you (the driver) should communicate the accident to your supervisor.

**Step 6:** Complete the Vehicle Accident Report Form at the scene of the accident.

### **Vehicle Accident Review**

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Safety/Loss Control will review all vehicle accidents to determine the true cause and whether it was preventable or non-preventable. A preventable collision is one in which the driver failed to do all that could be reasonably expected of them to avoid the collision. The functions of the Committee in reviewing vehicle collisions are as follows:

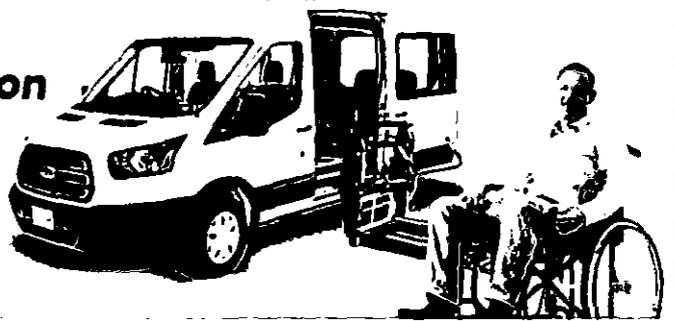
1. Convene as soon as possible after a collision involving a HUMANE CARE TRANSPORTATION SERVICES LLC vehicle to objectively consider the evidence presented. This evidence includes any information given by the driver, his or her supervisor, and the police report of the accident. These same rules also apply to any employee officially authorized to drive his or her personal car on official HUMANE CARE TRANSPORTATION SERVICES LLC business.
2. Determine the true cause of the collision and whether it was preventable or non-preventable.
3. Review the driver's past driving record.
4. Report in writing to Management the Committee's findings and the recommendations for corrective action.
5. For preventable rulings, arrange an individual meeting with the driver to review the decision, consider appropriate remedial training, and discuss possible corrective actions. This meeting will be scheduled as soon as possible after the preventability determination has been made.

### **Vehicle Selection**

It is important to ensure that vehicles selected for a specific function are adequate in design and capability for the intended purpose. It is the responsibility of each driver to select the appropriate vehicle to be used in performing tasks.

### **Vehicle Maintenance**

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Humane Care Transportation Services LLC ensures all vehicles are always safe, efficient, and well-maintained. The specifics of that approach will be detailed in the procedures to follow. A good preventive maintenance program lowers repair frequency and lowers overall maintenance cost. The service part of preventive maintenance is scheduled maintenance. Humane Care Transportation Services LLC vehicles will be given Preventive Maintenance according to the current fleet maintenance schedule.

### Vehicle Inspections

Humane Care Transportation Services LLC is committed to following a strong daily inspection program. All vehicles are to be inspected every day they are operated.

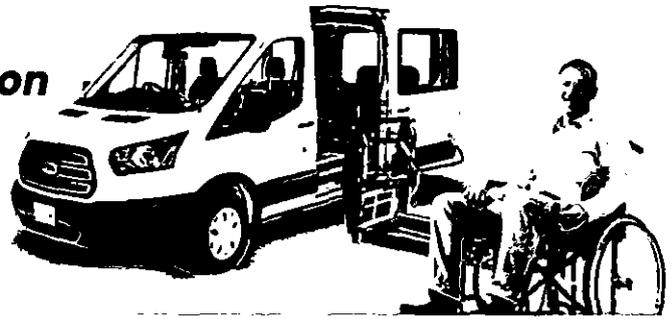
**1. Driver Pre-trip Inspection:** Each driver must be satisfied that his/her assigned vehicle is in proper working condition before operating. The driver will also review the last completed Driver's Vehicle Inspection Report to verify that any needed repairs were made to the vehicle. If the defects noted were not acknowledged by an authorized signature, the driver shall not drive the vehicle until the defects are handled appropriately.

When a driver reports safety-related problems or vehicle damage, the vehicle inspection report should be submitted to his/her supervisor. The Supervisor will sign the report indicating that repairs have been made (or are not required to be made). The original inspection report and certification of repairs will be retained in the Vehicle Maintenance File. The original inspection reports on which no defects were noted and on which defects were noted, and the certification of repairs, will be retained in the Vehicle Maintenance File.

### Driver On-The-Road Inspections

Once on the road, the driver must examine any wheelchair securing devices and make any necessary adjustments. If a problem is found, the driver will notify his/her supervisor and either have the necessary repairs or adjustments made before operating the vehicle or safely travel to the nearest repair facility.

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### **Vehicle Maintenance File**

A complete record of each vehicle in the fleet will be kept by the Mechanic. It will include basic vehicle information and information indicating the nature and due date of any inspection and maintenance operations to be performed on the vehicle, and a record of any inspections, repairs, and maintenance performed on the vehicle in question, including dates performed and specifics on the nature of the operations.

### **Vehicle Breakdown**

When a breakdown occurs, drivers must safely stop and secure both the vehicle and passengers.

- Safely placing the warning devices,
- Diagnosing and calling in the breakdown to his/her supervisor. The Supervisor's responsibilities when a breakdown occurs include Determining the nature of the breakdown and the best course of action
- Locating, contacting, and dispatching a vendor to facilitate repairs
- Obtaining all vehicle repair records

### **MVR Check and Point Structure System**

Point Structure Automatic Disqualification to operate an entity vehicle. No potential new or current employee will be allowed to drive a company vehicle (including a personal vehicle) for entity business if his/her MVR reveals:

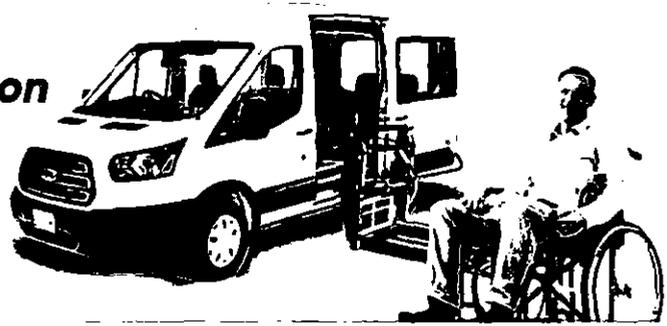
- Murder or assault with a motor vehicle
- Theft of a vehicle
- Hit and run
- Negligent homicide
- An alcohol-related violation within the past three years
- Illegal drug offense in the last 3 years

#### 7-point offenses:

- DWI, DUI, owl (alcohol or drugs)
- Reckless driving resulting in bodily injury or property damage
- Fleeing a police official
- Leaving the scene of an accident

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- Driving with a suspended/cancelled/revoked license
- Racing on a public road

### 4-point offenses:

- Speed in excess of 15 mph over the posted speed limit
- Failing to stop for a school bus
- Failing to stop at a railroad crossing
- Second preventable accident

### 3-point offenses:

- Failure to obey & traffic control device
- Failure to yield the right of way
- Speed too fast for conditions
- Following too close
- Careless/Reckless driving
- One preventable accident

### 1-point offenses:

- Seat belt violations
- Failure to use a turn signal
- Improper stop/parking

### **Defensive Driving Policy**

HUMANE CARE TRANSPORTATION SERVICES LLC is strongly committed to a sound and thorough defensive driving policy. While operating entity vehicles, drivers should always drive in the safest manner possible. Specifically, our drivers must operate entity vehicles in accordance with all provisions of the Commercial Vehicle Safety Program. Full-time and designated part-time employees driving Humane Care Transportation Services LLC vehicles shall be required to attend the Defensive Driving Course.

1. Assignments for classes shall be made by the employees' supervisor to ensure class quotas are met and to maintain satisfactory work schedules.
2. Frequency of employee attendance of Defensive Driving Courses shall be once per year.
3. New employees required to drive Entity vehicles shall be required to complete the Defensive Driving Course satisfactorily before starting their driving assignment.

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### The core concepts of defensive driving are:

- Recognize the hazard.
- Understand the defense.
- Act in time.

### Defensive Driving Procedures

**Intersections:** Getting into and out of intersections without an accident is a mark of a good defensive driver. Besides your own skill level, intersections also demand anticipation of the actions of other drivers and taking appropriate evasive action as required.

**Backing** is an extremely hazardous maneuver. If you are backing with the assistance of a guide, the ultimate responsibility for the safety of the backing maneuver remains with you as the driver.

**Front-End Collisions:** The primary way to avoid front-end collisions is by maintaining a safe and adequate following distance. You should be prepared for possible obstructions on the roadway, either in plain sight or hidden by curves or the crests of hills. A special situation occurs at night, when speed should be kept to a level that will allow you to stop within the distance illuminated by the headlights of your vehicle.

**Rear-End Collisions.** As a driver, you risk being struck from behind if you do not maintain an adequate margin of safety in your own following distance. If enough space is not allowed in front of your vehicle, chances go way up that somebody can (and will) impact you from the rear.

**Passing:** Failure to pass safely indicates faulty judgment on your part as a defensive driver, and failure to consider one or more of the factors that need to be checked:

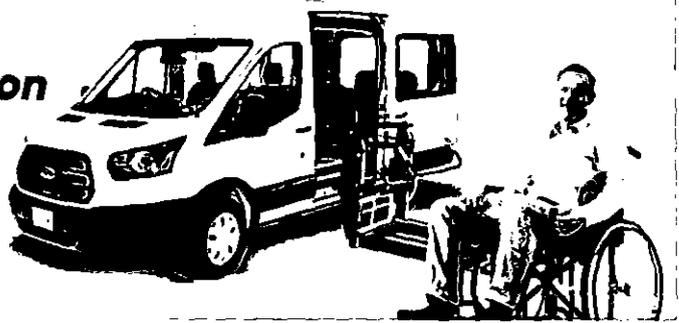
- Is there enough room ahead?
- Is there adequate space to move back into your lane of traffic after passing?
- Have you signaled your intentions?

**Being Passed:** As a driver, you must be aware of the actions of other drivers and give way if another driver begins to sideswipe you or to cut you off. A good defensive driver will avoid problems with this kind of accident situation.

**Encroaching on Other Traffic Lanes:** Observant defensive drivers will not usually get trapped when other drivers change lanes abruptly. In the same manner, entrapment in merging traffic can be avoided by a good defensive driver with a little preplanning and willingness to yield. Blind spots are not valid excuses for this kind of accident - allowances must be made in areas of limited sight distance.

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**Railroad Grade Crossings:** Driving across railroad crossings, or in areas where there are rail vehicles of some sort, demands special care. STOP at all rail crossings and proceed with caution. Careful observance of the traffic situation is your best defense.

**Oncoming Traffic:** A defensive driver will avoid a collision with an oncoming vehicle at all costs. Even if the vehicle enters your lane of traffic, an accident can be avoided with some evasive maneuvers.

**Turning:** Turning, like passing, is a dangerous maneuver and demands special care and an observant eye from you as a defensive driver. You should be aware of other vehicles in your path, and of the complete configuration of the turn you are about to undertake.

**Pedestrians:** As a sensible defensive driver, always assume that if there is a pedestrian (or bicycle) involved in a situation, slowing down is your best defense. Be certain to give people and bicycles the benefit of the doubt.

**Extreme Weather and Road Conditions:** Bad weather and other road hazards place special stress upon any defensive driver. In bad weather or extreme conditions, safely leave the road as soon as possible. If you absolutely must continue, slowing down and increasing following distance are your best defenses, along with increased awareness.

**Fog:** Reduces available visibility and impairs distance perception, making it perhaps the most dangerous type of extreme weather condition. Because of this, it is company policy that, whenever possible, drivers are to avoid driving in foggy conditions. Pull off the road and park safely until the fog dissipates or is burned off, if possible. If you cannot safely pull off the road, follow these procedures:

- You should never assume the depth or thickness of any fog. Fog can range from a momentary blurring of the windshield to several miles thick.
- Slow your vehicle's speed. Speed reduction should be made gradually to avoid becoming a hazard for other motorists. Determining a correct and safe speed depends on the thickness of the fog and is left to your best judgment.
- Use low-beam headlights only when driving in fog. Low beams serve two purposes. They improve your view of the road and make your vehicle more visible to others.
- Avoid the use of high-beam headlights while driving in fog. The water particles that make up fog will reflect more light at you than onto the roadway when high beams are used and will further reduce visibility for you.

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- You should make use of windshield wipers and the defroster when driving in fog. Driving in foggy conditions will cause a constant fine mist of water to develop on the vehicle's windshield, reducing visibility in the process. Using windshield wipers and defrosters will alleviate this condition.
- Avoid passing other vehicles while driving in fog.
- You should avoid stopping on any roadway while driving in foggy conditions unless necessary. If you must stop, use the emergency or breakdown lane, activate your emergency flashers, turn off the headlights, and follow approved breakdown procedures

**Rain:** causes roadways to become slippery, especially when it first begins. Roadways become covered with a thin layer of oil and other residues. When rain mixes with this layer, it results in an extremely slippery and dangerous road surface. This condition remains until additional rain can break down and wash away the oily mixture from the pavement. This process can take anywhere from a few minutes to several hours, depending on the severity of the rain. Water on the road surface can also create a potential hazard of hydroplaning. Hydroplaning happens when a thin layer of water separates the vehicle's tires from the road surface. When a vehicle is hydroplaning, it is literally riding on water. When the tires ride on water, they lose all traction and create an extremely dangerous situation. The faster a vehicle travels on standing water, the greater the chance of hydroplaning. Reducing speed is the best and safest way to avoid hydroplaning. Rain also reduces visibility. Because rain presents these hazards, drivers are expected to adhere to the following procedures when driving in rainy conditions:

- You should slow the vehicle's speed to avoid hydroplaning. Speed reduction should be done gradually to avoid becoming a hazard for other motorists. Determining the correct and safe speed depends on how heavy the rain is and will be left to your best judgment.
- You are expected to increase your following distance from other motorists. Since rain causes the road surface to become slippery, you need to allow for greater stopping distance if the need to stop arises.

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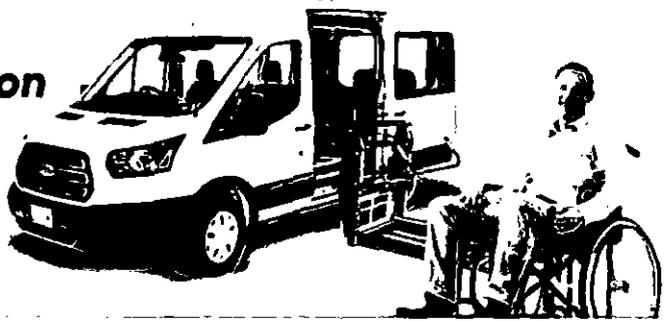
- You should make use of windshield wipers and the defroster when driving in the rain. Driving in rainy conditions will cause a constant film of water to develop on the vehicle's windshield, reducing visibility in the process. Windshield wipers and the defroster help resolve this issue.
- You should avoid passing other vehicles while driving in the rain. In addition, you are encouraged to follow other vehicles at a safe distance since vehicles traveling ahead will throw water off the pavement and leave "tracks". Driving in these tracks will give you the best possible traction under rainy conditions.

Snow: Depending on the type and severity, it can present a variety of dangerous conditions. Because of this, the following procedures have been developed for this defensive driving policy:

- Light, powdery snow presents few problems since it is quickly blown off the road surface. However, if there is enough of this type of snow to cover the roadway, it will form a slick, smooth surface. You should reduce speed and increase following distance. Determining the correct speed and safe following distance will be left to your best judgment.
- Heavier, slushy snow can affect vehicle control. If snow becomes hard-packed, it can cause an ice hazard on the road surface. Again, you should reduce speed and increase following distance. Determining the correct speed and safe following distance will be left to your best judgment.
- All slow things, such as starting, steering, backing, and turning, should be done smoothly and with extreme care to minimize skids and slides.
- Falling or blowing snow can greatly reduce visibility. In addition, falling and blowing snow can make it hard to see the road, road markings, road signs, and off-ramps. If you must continue in snowy conditions, reducing speed and increasing following distance are the best techniques a driver can use to maintain vehicle control.

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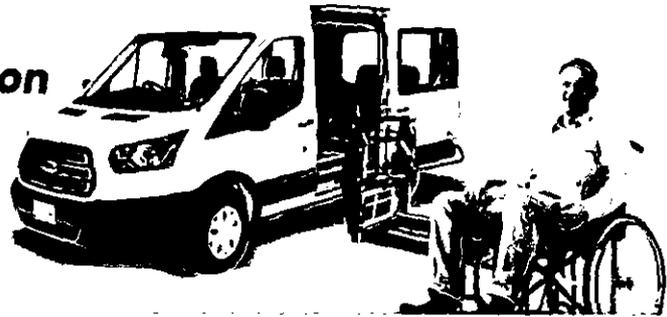


- Avoid using high beams when driving in snow, just as you would in fog. High beams reflect off snow, reducing your visibility even further.
- Drivers will also be educated about the dangers of "snow hypnosis". Snow hypnosis occurs when a driver is traveling directly into heavy snow and begins to focus on the falling snow instead of the road ahead. This can cause a hypnotic-like effect on the driver. The danger of snow hypnosis is especially prevalent at night.
- In extreme conditions, chains may be necessary

Ice: Drivers should stay alert to road surface changes that can affect traction. Below are procedures for driving on icy roads as part of this defensive driving policy:

- As with all extreme weather conditions, if you must continue, the safest techniques to employ are to reduce speed and increase your following distance. But of these two, increasing following distance is by far the most important. Depending on the temperature and road conditions, stopping distance (the distance needed to come to a complete stop) on icy roads can increase four to ten times versus stopping from the same speed on a dry road.
- "Black Ice" forms when temperatures drop rapidly and any moisture on the road surface freezes into a smooth, almost transparent layer of ice. What makes black ice particularly dangerous is that you may not realize you are on it until it's too late. Determining the correct speed and safe following distance will be left to your best judgment.
- Bridges and overpasses are other areas to which you should give special attention. Ice will tend to form first on bridges and overpasses because cold air circulates both above and below these structures, causing the temperature to drop more rapidly than on normal roads. Any moisture on the road surface of a bridge or overpass will freeze quickly and harder than elsewhere on the road. Extreme caution and a speed reduction should be used while traveling over bridges and overpasses.

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Night Driving: Drivers should be aware of the risks associated with night driving.

Road Construction: We realize that chances are good that from time to time our drivers will be faced with having to drive on roadways that are being repaired or under construction. Road construction presents several hazards. Drivers should treat road construction zones like any other adverse condition and follow these procedures:

- You should reduce speed and maintain a safe following distance.
- You should drive at or under all special or reduced posted speed limits while traveling through road construction work zones. Safe following distance will be left to your best judgment.
- You should be constantly aware of your immediate surroundings, anticipate the possible actions of other motorists, and expect sudden stops.
- You should watch for construction workers or vehicles crossing the roadway.
- You should use the lane furthest from a construction zone when possible.
- You should avoid sudden lane changes and use headlights and four-way flashers when traveling through construction zones.

Road Hazards: Drivers should be aware of the potential danger of encountering various types of road hazards, including:

- Soft shoulders or severe pavement drop-offs that can cause rollover-type accidents.
- Road debris such as tire recaps, metal, or lumber can cause severe damage to tires, tire rims, electrical systems, and brake lines. You should be aware of the road ahead to identify potential road debris early and take safe and appropriate avoidance maneuvers.

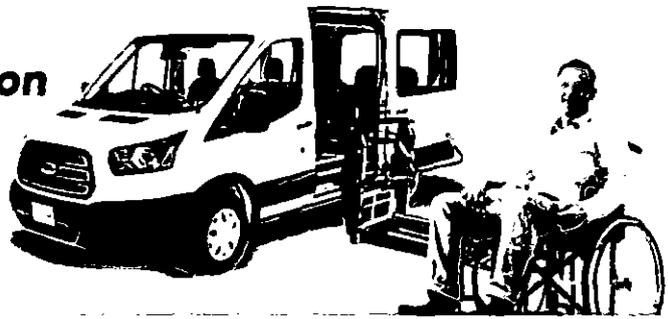
Underpasses: Hitting a bridge, underpass, or viaduct is a danger you should be constantly aware of.

Physical and Mental Condition: Drivers are expected to manage their physical and mental condition. That especially means keeping a positive attitude when behind the wheel and taking good care of their physical health. Fatigue is an especially dangerous factor to be aware of.

- add extra time in bad weather or poor road conditions,
- add extra following distance if you are being tailgated.

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Driving Speed: You should drive consistently with posted speed limits; your speed has to conform to city driving speed.

Curves and Turns: The biggest thing to remember in successfully negotiating curves and turns is to slow down. That way, you will be able to make any needed adjustments in steering, etc., as required.

Backing: You should avoid backing. Each van is equipped with a backup camera to help the driver to back up safely. It is the responsibility of the driver to use it, but this camera will not be the only tool for the driver. Scan the area.

Cell Phones: May be used only in hands-free mode, and only when permitted by traffic conditions. Never in heavy traffic. If you get a call, let it go to voicemail, pull it over in a safe area and return the call.

### Q7. Fleet Safety Program Policy

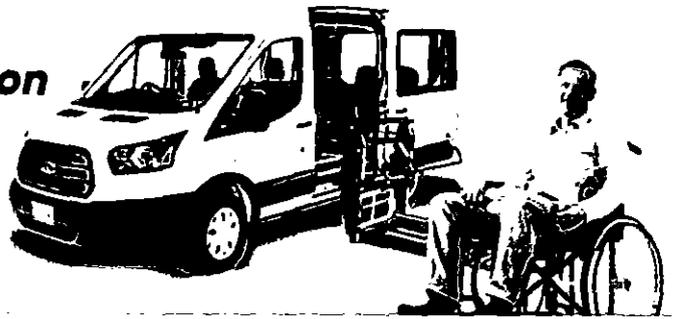
Humane Care Transportation Services LLC is **fully committed to the development and rigorous maintenance of a comprehensive Fleet Safety Program.** The primary objective of this program is to prevent accidents, injuries, and property damage, thereby ensuring the well-being of our employees, our clients, and the public. We believe that a proactive approach to safety is not only a regulatory obligation but also a fundamental component of our operational excellence

We recognize that the success of our safety initiatives depends on a culture of **shared responsibility and accountability.** Every member of the Humane Care Transportation Services LLC team, from executive leadership and dispatch personnel to every driver, is expected to actively participate in and contribute to our safety and loss prevention efforts. Our management team is dedicated to providing the necessary resources, training, and support to empower all employees to perform their duties safely and responsibly.

#### Responsibilities

##### 1. Management

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- Assume responsibility for the driving record of employees while they are on duty.
- Regularly verify that all personnel comply with established requirements and policies.
- Personally, review the decisions on accidents and take all steps necessary to prevent a recurrence.
- Establish and adhere to policies on corrective actions in accordance with the policy regarding actions that will be taken to help the employees, who show a repeated disregard for good driving practices, to improve...
- Insist that all assigned vehicles are maintained adequately for safe operation.
- Establish periodic inspection of assigned vehicles for safety discrepancies, malfunctions, and signs of abuse, unreported damage and cleanliness. Have repairs made as soon as possible.
- Fully support the Humane Care Transportation Services LLC driver training program to promote defensive driving.
- Review each preventable vehicle accident and unsafe driving report with the employee and his supervisor to emphasize management's support of responsibility behind the wheel.
- Establish an aggressive campaign to enforce the wearing of seat belts on all trips.

### **2. Supervisors**

- Ensure that employees do not drive any Humane Care Transportation Services LLC vehicle unless they have a VALID driver's license and are familiar with Humane Care Transportation Services LLC driving rules and regulations.
- Ensure that only authorized personnel are allowed to operate Humane Care Transportation Services LLC vehicles, special-purpose vehicles.
- Promptly address unsafe employee practices by observing and correcting drivers immediately.
- Review all preventable vehicle collisions with employees at Safety Meetings and discuss each unsafe act that was responsible.
- Periodically ride with the van drivers to check for compliance with operating instructions and traffic regulations.
- Ensure that unsafe vehicles are not driven until safety discrepancies have been corrected.

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- Ensure that vehicle inspections are done each day and any issues are resolved.

### 3. Employees

Employees who drive Humane Care Transportation Services LLC vehicles are responsible for following all the guidelines outlined in the Fleet Safety Program. These responsibilities include:

- Safe operation of vehicles and for the safety of passengers.
- Having a valid driver's license in their possession
- Inspecting the vehicle which they are about to drive, in accordance with established policies and D.O.T. Regulations
- Reporting any vehicle accidents

### 4. Safety / Loss Control Officer

The Safety/Loss Control Officer is responsible for enforcing Fleet Safety Program policies. Responsibilities will include:

- Monitoring the driving experience of employees who operate entity vehicles.
- Ensure vehicles are properly maintained for safe operation.
- Verify that adequate insurance limits are maintained by drivers who use their personal vehicle for entity business.
- Ensure compliance with all D.O.T. Regulations.

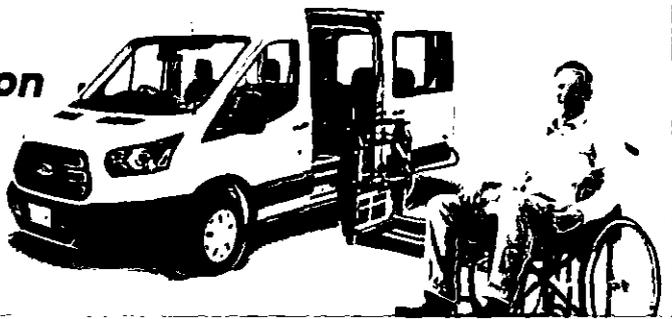
### 5. Vehicle Operator Responsibilities

The driver is responsible for checking the safety and general condition of the vehicle, including gas, oil, and other fluid levels, lights, and brakes. With the assistance of the supervisors will furnish vehicles with inspection checklists that comply with D.O.T. Regulations if there is something wrong with the vehicle, which may affect safety, repairs will be made before use.

1. Vehicle Abuse: No employee will use a vehicle or equipment for any purpose for which it was not designed, operate it beyond its designed limits, and operate it in areas or locations for which it was not designed, or cause damage through neglect, misuse, improper driving techniques, or improper handling.
2. Transporting Employees in vehicles. No more than two employees will ride in the front seat or cab of a vehicle. Each position will be equipped with a seat belt, and each person

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will use the seat belt provided. No employee will be authorized to ride or work from the bed or rear of a vehicle while it is in motion.

3. **Traffic Laws:** Employees will adhere to all traffic laws and regulations when operating Humane Care Transportation Services LLC vehicles. An employee will always operate Humane Care Transportation Services LLC vehicles in such a manner as to avoid injury to persons or property damage.
4. **Unauthorized Use of Vehicles:** Humane Care Transportation Services LLC vehicles are to be used for Humane Care Transportation Services LLC business only. People found using Humane Care Transportation Services LLC vehicles for their personal errands may be subject to corrective action up to and including termination.
5. **Operation and Occupancy of Entity Vehicle by Unauthorized Persons:** Employees will not permit unauthorized employees or non-employees of Humane Care Transportation Services LLC to ride in (Company) vehicles, except when such persons are conveyed in the performance of duty or authorized to ride by supervisory staff.
6. **Parking Vehicles** All employees will park their vehicles legally and properly. Employees will remove the keys and lock the vehicles, except when specifically instructed otherwise. Employees will not park on the wrong side of a street or highway, unless it is mandatory to park in such a location to perform a job. All signs, cones, lights, and warning devices as required by law will be used when vehicles are parked or in use in a public travel lane. Employees will use all safety brakes, lockout devices, and other parking safety methods when parking equipment.
7. **Use of Personal Vehicles for Unauthorized Use of Vehicles:** Humane Care Transportation Services LLC vehicles are to be used for Humane Care Transportation Services LLC business only. People found using Humane Care Transportation Services LLC vehicles for their personal errands may be subject to corrective action up to and including termination.

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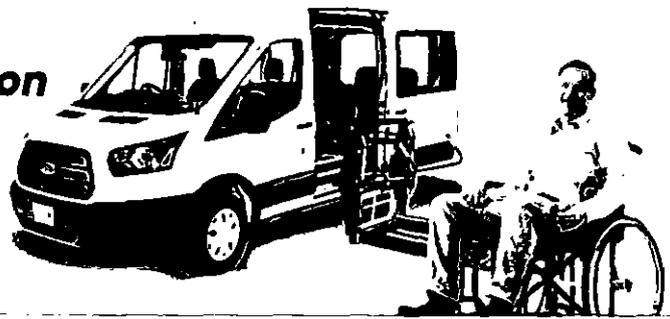
8. **Business:** Supervisors will identify and authorize those employees who are required, as part of their normal job duties, to use their personal vehicle to conduct business. The employee's own insurance policy is the primary coverage, and, therefore, Humane Care Transportation Services LLC will not be responsible for any claims that arise out of any motor vehicle accident that the employee is involved in while operating their personal vehicle. The mileage reimbursement the employee receives is intended to fully cover all costs of the operation of the employee's personal vehicle, including but not limited to fuel, maintenance, repairs, insurance, etc.
9. **Transporting Equipment:** Employees Humane Care Transportation Services LLC vehicles must exercise utmost care when transporting equipment, packages, or other materials within the driver or passenger compartment to prevent these items from becoming projectiles in the event of an accident. Such items as briefcases, laptop computers, tools, etc., need to be transported in the trunk of passenger vehicles. Pickups, whether standard cab or extended, should have secured storage capabilities; the bed of the vehicle, such as tool storage or camper shells, if they are used with any regularity in the transport of items that could injure the driver or passenger(s) in the event of an accident. Vans used in the regular transport of such items should have screen-type barriers between such cargo and the driver/passenger compartment. It is always important to keep the driver/passenger as free as possible of objects that could distract their attention or cause unexpected movement.

### **Vehicle Maintenance and Inspection Schedule**

1. **Routine Service**
  - Every 3000 Miles -Lube-Oil-Filer
  - Every 5000 Miles -Rotate tires and balance
  - Every 12,000 miles -Air Filter - PCV Valve -Brake Service -Front-end alignment -Engine tune-up -Transmission Service
  - Every 20,000 Miles -Shock absorbers - Automatic Transmission drain /refill
  - Every 36,000 Miles -Differential drain/refill - Wheel bearing package
0. **Every 3 months, inspect the following: (make required repairs)**

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- All fans, A/C, power belts
  - Radiator, heater, A/C hoses
  - A/C, heater system
  - Power steering
  - Windshield wiper blades and arms
  - Doors and windows
- 0. Every 6 months, inspect the following: (make required repairs)**
- Alternator/generator
  - Battery
  - Exhaust system, muffler, converter, tail pipe
  - Emission control system
  - Ignition system
  - Door locks and window mechanisms
  - Fuel tank and suspension system
- 0. Annually inspect and/or conduct the following: (make required repairs)**
- Comprehensive engine tune-up and analysis
  - Comprehensive steering/brake system evaluation
  - Comprehensive body/paint check
  - Comprehensive evaluation of the emission control system
  - Drain, flush, and clean the cooling system-refill
  - Electrical wiring
  - Suspension system
  - Mechanical linkages
  - Interior condition

## Verified Statement of Applicant - Q.7b

### Compliance System for Humane Care Transportation Service LLC Vehicles

**Humane Care Transportation Service LLC** will be dedicated to ensuring that all its vehicles continuously comply with the applicable Pennsylvania vehicle equipment standards as outlined in 67 Pa. Code Chapter 175. Our system will ensure that our fleet of 6-seater vehicles will meet all regulatory requirements to guarantee the safety and comfort of our passengers, particularly those with mobility challenges, once we begin operations.

#### 1. Regular Compliance Audits

**Objective:** To proactively verify that all vehicles in our fleet meet the equipment standards required by 67 Pa. Code Chapter 175.

- **Annual Compliance Audit:**
  - **Internal Audits:** Humane Care Transportation Service LLC will conduct an annual internal compliance audit for each vehicle in our fleet. This audit will cover all applicable aspects of Chapter 175, including lighting, safety equipment, braking systems, mirrors, tires, and accessibility features.
  - **Audit Checklist:** We will develop a detailed compliance checklist based on 67 Pa. Code Chapter 175 to ensure each vehicle meets the required standards. The checklist will include items such as:
    - **Lighting Equipment:** Ensuring compliance with headlights, tail lights, brake lights, and reflectors.
    - **Braking System:** Verifying that brake components meet required specifications and are in good working order.
    - **Tires:** Confirming that tires meet the minimum tread depth and are free from defects.
    - **Mirrors and Windows:** Checking for proper mirror placement and window tinting regulations.
    - **Accessibility Equipment:** Ensuring wheelchair lifts, ramps, and securement devices are fully operational and compliant with ADA and state regulations for paratransit vehicles.

- **Third-Party Inspections:**
  - In addition to internal audits, Humane Care Transportation Service LLC will work with authorized third-party inspectors, certified to conduct compliance checks in accordance with 67 Pa. Code Chapter 175. These independent professionals will provide unbiased assessments of vehicle compliance.
- **Documentation and Record Keeping:**
  - We will maintain detailed records of all audits and inspections, including checklists, inspection reports, and corrective action plans. These records will be stored digitally and available for review by Pennsylvania authorities upon request.

## **2. Ongoing Maintenance and Inspection Program**

**Objective:** To ensure that vehicles in our fleet are continuously maintained in accordance with Pennsylvania vehicle equipment standards.

- **Pre-Trip Inspections:**
  - Drivers will conduct **pre-trip inspections** before every shift to verify that critical safety equipment is operational. This includes checking:
    - **Headlights, brake lights, turn signals, and reflective materials**
    - **Windshield wipers and washers**
    - **Mirrors (both interior and exterior)**
    - **Tires (for proper inflation and tread depth)**
    - **Wheelchair lifts, ramps, and securement devices** (for paratransit vehicles)
  - Each pre-trip inspection will be documented on a vehicle inspection checklist and submitted daily to the fleet manager for review.
- **Periodic Vehicle Inspections (Monthly/Quarterly/Annual):**
  - **Monthly Inspections:** Comprehensive inspections will be conducted by fleet maintenance personnel to check components such as:
    - **Braking system, suspension, exhaust system, and lighting**
    - **Tires:** Checking for proper inflation, tread depth, and overall tire condition.
    - **Vehicle body:** Ensuring there is no visible damage and that all components are intact.

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# DRUG AND SUBSTANCE ABUSE MANUAL

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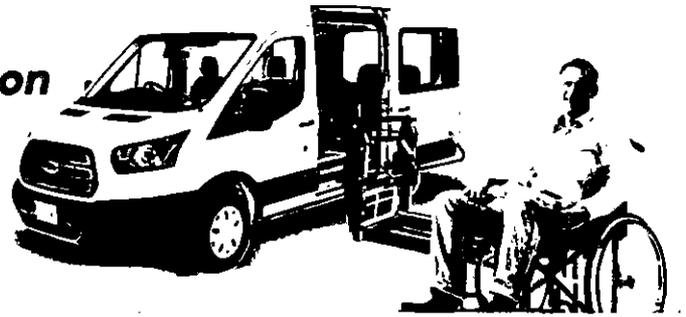
HUMANE CARE TRANSPORTATION SERVICES LLC

DATE OF DEPOSIT

AUG 26 2025

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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**1.0 STATEMENT OF PURPOSE AND SCOPE OF POLICY**

1.1. Humane Care Transportation Services LLC is firmly committed to ensuring a safe, healthy, productive, and efficient work environment for our employees, customers, and the public in general. The Company has a vital interest in ensuring a safe, healthy, and efficient working environment and the prevention of accidents and injuries, which can result from the misuse of alcohol or controlled substances by drivers of the Company's commercial vehicles. For these reasons, and as required by the drug and alcohol testing regulations of the Federal Motor Carrier Safety Administration ("FMCSA"), the Company has established this substance abuse policy for the drivers of its commercial motor vehicles. Drug and alcohol testing is an integral part of our policy and program. Compliance with this policy is required by applicants as a condition of employment and by drivers as a condition of continued employment.

1.2. This policy applies to any driver who operates a "HUMANE CARE TRANSPORTATION SERVICES LLC vehicle for or on behalf of the Company. The policy also applies to all applicants who seek employment for such driver positions. Additionally, this policy applies to any Company supervisor and other managerial personnel who drive or may be required to drive a HUMANE CARE TRANSPORTATION SERVICES LLC vehicle from time to time on the Company's behalf.

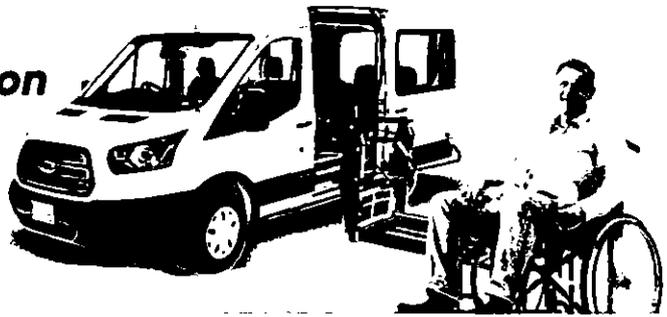
1.3. This policy explains FMCSA's drug and alcohol regulations and the Company's own policies with respect to the use of controlled substances or the misuse of alcohol. Provisions of this policy that are included under the Company's independence are specifically noted by text, which has been underlined.

1.4. This policy is not a contract of employment. All company employees are employees at will. This means that employment can be terminated at any time by the employee or the Company with or without cause and with or without notice. If an employee fails to

Complying with this policy, the employee will be subject to corrective action, up to and including termination. In the case of an applicant, noncompliance will result in the applicant being ineligible for employment with the Company.

1.5. The Company maintains a policy of non-discrimination and will endeavor to make

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reasonable accommodations to assist recovering addicts or alcoholics and those having a medical history reflecting treatment for substance abuse conditions. Employees should ask for help before drug or alcohol use affects their job performance or safety.

- 1.6. Any questions regarding the meaning or application of this policy should be directed to the Program Administrator, who shall be the designated Company representative for purposes of this policy.

## **2. DEFINITIONS**

2.1 **"Alcohol"** refers to the intoxicating component in drinks, such as ethyl, methyl, or isopropyl alcohol.

2.2 **"Alcohol Use"** means consuming any beverage, mixture, preparation, or medication containing alcohol.

2.3 **"Controlled Substances"** and **"Drugs"** refer to marijuana, cocaine, opiates, amphetamines, phencyclidine (PCP), their metabolites, and any other substances listed in Schedules I-V under the Controlled Substances Act, as updated. The terms "controlled substances" and "drugs" include legal substances obtained illegally or used in an unauthorized manner, but do not refer to the proper use of controlled substances authorized by law, which do not affect job safety or performance.

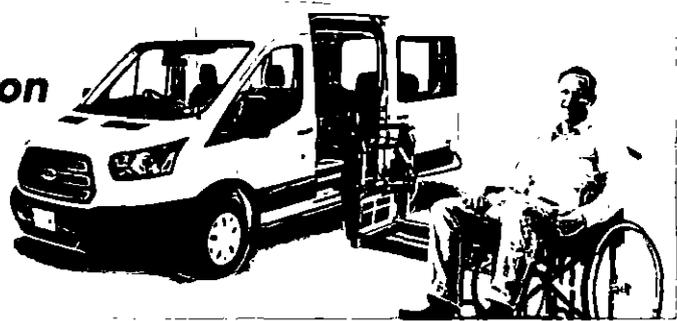
2.4 **"Disabling Damage"** refers to damage that prevents a motor vehicle from being driven away from the accident scene, even after simple repairs, including cases where driving would cause further harm.

driven. This term does not include damage which can be remedied temporarily at the scene of the accident without special tools or parts; tire disablement without other damage, even if no spare tire is available; headlight or taillight damage; or damage to turn signals, horn, or windshield wipers which make them inoperative.

2.6 **"Driver"** means any person who operates a "HUMANE CARE TRANSPORTATION SERVICES LLC vehicle" Under FMCSA regulations, this includes, but is not limited to: full time, regularly employed drivers; casual, intermittent, or occasional drivers.

2.7 **"Medical Review Officer" ("MRO")** means a licensed physician (medical doctor or doctor of osteopathy) responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results.

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2.8 "**Performing a Safety-Sensitive Function**" means any period in which a driver is performing, ready to perform, or immediately available to perform any safety-sensitive functions.

2.9 "**Safety Sensitive Function**" means the following activities and includes the time a driver begins to work or is required to be in readiness to work until the time he/she is relieved from work and all responsibility for performing work:

- a. All time at a Company or picking up / dropping a passenger, waiting to be dispatched, unless the driver has been relieved from duty by the Company.
- b. All time inspecting equipment as required by FMCSA's regulations, 49 C.F.R. "392.7 and 392.8, or otherwise inspecting, servicing, or conditioning any **Humane Care Transportation Services LLC** vehicle at any time.
- c. All time spent at the driving controls of a **Humane Care Transportation Services LLC** vehicle in operation.
- d. All time repairing, obtaining assistance, or remaining in attendance upon a disabled vehicle.

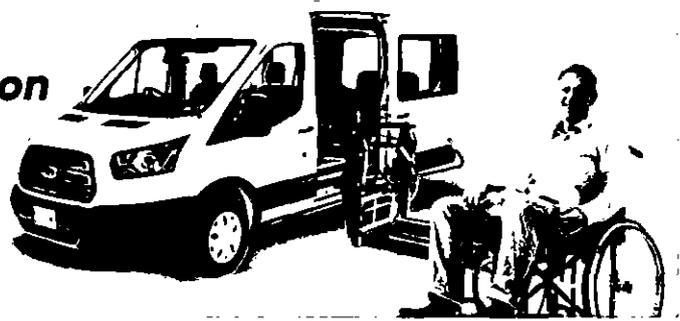
2.10 "**Substance Abuse Professional**" ("**SAP**") means a person who evaluates employees who have violated a DOT drug and alcohol regulation and makes recommendations concerning education, treatment, follow-up testing, and aftercare. An SAP may be a licensed physician (medical doctor or doctor of osteopathy), or a licensed or certified psychologist, social worker, employee assistance professional, or addiction counselor. All SAPs must have knowledge of and clinical experience in the diagnosis and treatment of alcohol and controlled substances-related disorders.

### 3.0 PROHIBITED CONDUCT

#### 3.1 Prohibited Conduct Concerning Drivers' Use of Drugs and Alcohol:

- a. Drivers are prohibited from reporting for duty or remaining on duty when using any drugs, except when the use is under the instructions of a medical doctor who has advised the driver that the substance will not adversely affect the driver's ability to safely operate a commercial motor vehicle.
- b. Drivers are prohibited from reporting for duty or remaining on duty with an alcohol concentration of 0.04 or greater. Drivers found to have an alcohol concentration of 0.02 or greater, but less than 0.04, are prohibited from performing any safety-sensitive functions for at least 24 hours from the test.

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c. Drivers are prohibited from using alcohol in any form (including medications containing alcohol) while performing safety-sensitive functions (refer to Section 2.7 of this policy for the definition of performing safety-sensitive functions).

d. Drivers are prohibited from performing safety-sensitive functions within four (4) hours after using alcohol. On-call employees who are not at work but could be called to drive or perform other safety-sensitive functions are subject to this pre-duty alcohol prohibition. This means a driver who is on-call must decline a call to work if his or her acceptance would require the employee to drive or perform other safety-sensitive functions within four (4) hours after consuming alcohol.

e. Drivers are prohibited from using alcohol for eight (8) hours following an accident or until the driver takes a post-accident alcohol test (and tests negative), whichever occurs first.

f. Drivers may not "refuse to submit" to any drug or alcohol test required under the FMCSA's drug and alcohol rules and/or this policy. (For further details concerning what actions will be considered as a "refusal," refer to section 3.2 of the policy.)

g. Drivers are prohibited from performing or continuing to perform a safety-sensitive function if they have tested positive for controlled substances or alcohol.

h. Drivers may not refuse to submit to any inspection required under section 11.0 of this

i. Drivers are prohibited from engaging in unlawful or unauthorized manufacture, distribution, dispensation, sale, purchase, solicitation, transfer, possession, use or transport of controlled substances or alcohol. These prohibitions do not include authorized distribution, dispensation, sale, purchase, solicitation, transfer, possession, use, or transport of alcoholic beverages in connection with Company-sponsored functions or «events.

j. Drivers are prohibited from failing to stay in contact with the Company or its medical review officer ("MRO") while awaiting the results of a drug test.

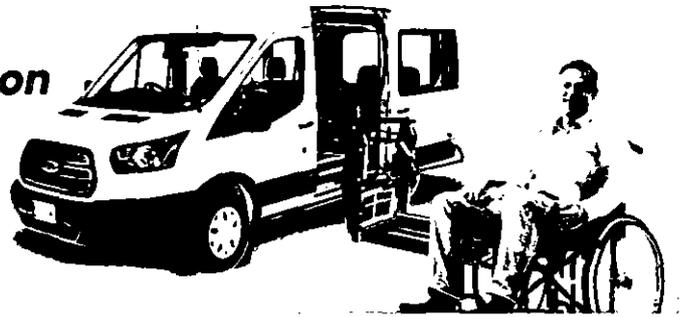
**3.2 Refusal to Submit:** For purposes of this policy, the following employee conduct will be considered a refusal to submit to a test:

a. failing to appear for any test within a reasonable time, as determined by the Company, after being directed to do so by the Company.

b. failing to remain at the testing site until the testing process is complete. c. failing to provide a urine specimen, or breath or saliva specimen for testing.

d. failing to attempt to provide a breath or saliva specimen for testing.

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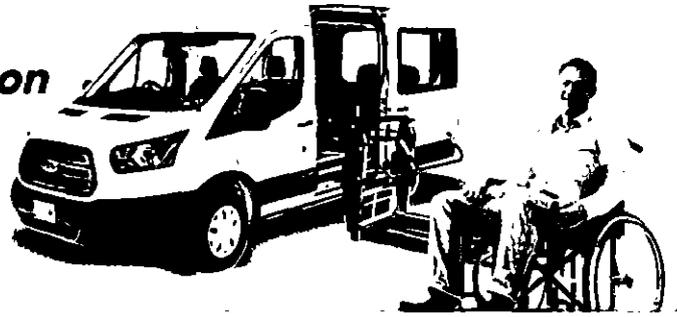
- e. failing to provide enough urine when directed, unless it has been determined, through a required medical evaluation, that there was an adequate medical explanation for the failure.
- f. failing or declining to take a second Drug or Alcohol test that the Company or collector has directed to be taken, including failing to take a second test that the Company has directed following a negative result.
- g. failing to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the Program Administrator or other designated Company representative as part of the "shy bladder" procedures, or the insufficient breath procedures.
- failing** to provide a sufficient breath specimen when directed, unless it has been determined, through a required medical evaluation, that there was not an adequate medical explanation for the failure, or failing to sign the certification at Step 2 of the Alcohol Testing Form.
- j. altering or substituting a urine sample (which has been verified by the MRO)
- k. failing to cooperate with any part of the testing process, such as by refusing to empty pockets at the collection site, by failing to permit the observation or monitoring of the provision of a urine specimen in the case of a directly observed or monitored collection in a drug test or by in any other manner delaying the collection, testing or verification process or otherwise engaging in conduct that obstructs, or attempts to obstruct the testing process, as provided in the Company's Drug/Alcohol-Free Workplace Policy.

**3.3 Consumption of Food or Food-Products Containing Hemp:** The consumption of food and food products containing hemp (for example, hemp oil) may cause a driver to test positive for marijuana. A test result that is positive because of a driver's consumption of food or food products containing hemp will be reported as a positive test. (Refer to Section 7.3 regarding the consequences of a positive test result.)

**3.4 Prohibition on Supervisor or Manager Permitting A Driver To Work:** No supervisor or manager who has actual knowledge that an employee has engaged in or is engaging in conduct prohibited under this policy shall permit the employee to work or continue working under such circumstances. Any employee who has been directed not to work or directed to stop working under such circumstances must immediately comply.

**3.5 Prohibition Against Working While Using Any Drug Medications Which Affect Safety or Performance:**

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- a. Except as otherwise provided in this section, the lawful use of any medication (therapeutic drugs) while performing a safety-sensitive function is prohibited to the extent such use may affect the driver's ability to perform his/her job duties safely.
- b. A driver who will use, or who is using, any medication that contains a controlled substance must inquire and determine whether the medication the driver is using or may use could affect the driver's ability to perform his/her job duties safely.
- c. If the driver is or will be using any such drug medication, the driver is required to obtain from the driver's licensed medical practitioner a written statement which provides that the medication will not interfere with the driver's ability to safely and efficiently perform the driver's job duties or provides the work restrictions, if any, which the driver is subject to for the period of time the driver is taking the medication.
- d. In the event a driver is using or will be using drug medication which will interfere with or adversely affect the driver's ability to perform his or her job duties, such information must be reported to the driver's immediate supervisor before commencing any safety-sensitive functions, without disclosing the identity of the substance. The driver must also have the medication available for review by the Company's MRO in its original container, which must identify the medication dosage and other pertinent information about the medication.
- e. A driver may continue to work. If the Company's MRO and the licensed medical practitioner have determined that the medication will not adversely affect the driver's ability to safely and efficiently perform the driver's safety-sensitive functions, or they have determined that reasonable accommodation can be made concerning the driver's medication. A driver will not be permitted to perform his or her safety-sensitive functions unless such a determination or reasonable accommodation has been made.

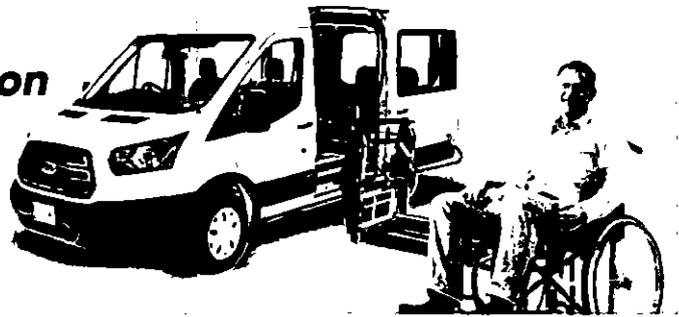
### 4.0 REQUIRED TESTS AND PAST TEST RESULTS INFORMATION

As required by DOT's and FMCSA's regulations, the Company will conduct drug and alcohol tests under the conditions and circumstances described below.

#### 4.1 Pre-Employment Drug Testing and Past Test Results Information:

- a. All applicants who have received a conditional offer of employment in a commercial motor vehicle (CMV) driver position, and all existing employees whose transfer to a CMV driver position has been conditionally approved, are required to submit to a pre-employment drug test and must receive a negative test result as a condition of employment. Such tests will be conducted before the time the applicant is hired or transferred.

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b. In addition to a pre-employment drug test, FMCSA's regulations (DOT's regulations after August 1, 2001) require the Company to obtain the following specific information concerning an applicant's past FMCSA-regulated (DOT-regulated, on and after August 1, 2001), drug and alcohol tests from an applicant's former employers during the previous two years: (i) confirmed alcohol tests with results of 0.04 or greater; (ii) drug tests whose results were verified positive; and (iii) all instances in which the applicant refused to be drug or alcohol tested (including verified adulterated or substituted drug test results). Effective August 1, 2001, the Company will also be required to obtain information regarding (iv) other violations of DOT drug and alcohol testing regulations, and (v) documentation that the employee completed DOT return-to-duty requirements, including follow-up testing, where applicable. All such information shall be obtained confidentially, and the Company will maintain a *written confidential record concerning each former carrier contacted*. The information obtained from a previous employer who employed the applicant in a CMV driver or other FMCSA safety-sensitive position may contain alcohol and drug information that the employer obtained from other previous employers regarding the FMCSA-required drug and alcohol testing of the applicant. As of August 1, 2001, the information obtained from an employer who employed the applicant in a CMV driver or other DOT-regulated safety-sensitive position may contain alcohol and drug information that the employer obtained from other previous employers during the past two years.

c. If the Company learns from the driver's previous employers that the driver had an alcohol test result of 0.04 or greater, a verified positive drug test, or refused to be tested, on a

FMCSA-required drug or alcohol test (on a DOT-required drug or alcohol test on or after August 1, 2001), the driver either will be ineligible to drive for the Company, or if hired, the driver will be terminated, unless the Company obtains evidence that the driver has complied with the referral and rehabilitation requirements outlined in 5382.605 of FMCSA's regulations (as of August 1, 2001, the return-to-duty requirements, including follow-up tests, outlined in Subpart O of 49 C.F.R. Part 40).

d. Effective August 1, 2001, an applicant must inform the Company whether he or she has tested positive, or refused to test, on any pre-employment drug or alcohol test administered by an employer to which the applicant applied for, but did not obtain, safety-sensitive transportation work covered by DOT agency drug and alcohol testing rules during the past two years.

### 4.2 Post-Accident Drug and Alcohol Testing:

a. A driver who is performing safety-sensitive functions (as defined in Section 2.8 of this policy) involving a commercial motor vehicle is required to submit to a post-accident drug

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and/or alcohol test under the circumstances listed below. The alcohol test is required to be conducted within 2 hours, and the drug test within 32 hours after the accident.

1. **Fatal accidents:** A driver who is involved in an accident that results in the death to another human being must always submit to a drug and alcohol test.

2. **Non-fatal accidents:** A driver who is involved in a non-fatal accident must submit to a post-accident drug and alcohol test if:

(a) The driver was given a citation for a moving traffic violation involving the accident

and (b) The accident also results in one of the following:

(1) bodily injury to the driver or another individual, requiring immediate medical treatment away from the scene of the accident; or

(2) one or more of the vehicles involved in the accident incurs disabling damage (as defined in Section 2.5 of the policy), requiring the vehicle(s) to be transported away from the scene by a tow truck or other vehicle.

3. In addition, drivers who the Company deems to have caused or contributed to a work related accident (as defined below) will be required to submit to a drug and alcohol test.

(a) As used in this policy, "work-related accident" means an accident:

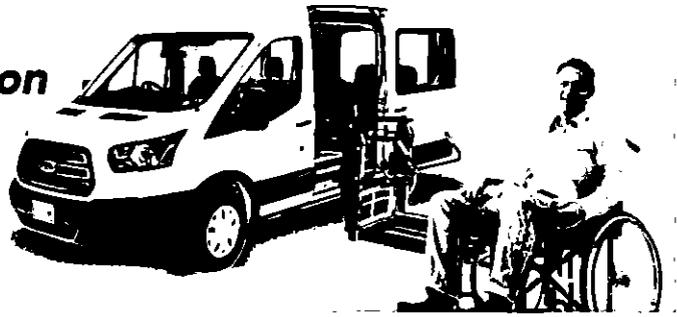
(1) which occurs while the employee is on the premises of the Company or is off-site while engaged in activities for or on behalf of the Company, or while the employee is operating a vehicle, including the employees, for or on behalf of the Company, and

(2) which results in bodily injury to any individual who, as a result of the accident, receives or requires medical treatment beyond first aid, is rendered unconscious, or spends days away from work, or is placed on reduced or modified job duties or schedule.

b. Drivers involved in any accident involving their vehicle must notify the Program Administrator as soon as possible to obtain information on how to proceed with the required testing. Drivers are obligated to follow the Program Administrator's instructions and, if directed, submit to post-accident drug and alcohol tests as soon as possible.

c. A driver who is subject to post-accident testing must remain ready for such testing or else will be deemed to have refused to submit to such testing. However, the "readily available" requirement does not require the delay of necessary medical attention for injured people or prohibit a driver from leaving the scene of the accident for the period necessary

## Care and Transportation You Can Trust



to obtain assistance in responding to the accident or to obtain necessary emergency medical care.

d. A driver who is involved in an accident, and who the Company reasonably suspects are under the influence of drugs or alcohol, will be suspended after completion of the drug and/or alcohol tests. The Company also reserves the right to evaluate the conduct of the driver, which may have caused or contributed to the accident, to determine if this conduct in and of itself should warrant corrective action, up to and including termination.

e. The results of a breath or blood test for the use of alcohol, or the results of a urine test for the use of controlled substances, conducted by Federal, State, or local officials having independent authority for the test, shall be considered to meet the requirements of this section, provided such tests conform to the applicable Federal, State or local alcohol testing requirements, and that the results of the tests are obtained by the employer.

### 4.3 Random Drug and Alcohol Testing:

a. Each year the Company will administer random alcohol and drug tests. Random drug tests may be conducted at any time. Random alcohol tests will only be conducted while a driver is performing safety-sensitive functions, just before the driver performs safety sensitive functions, or just after the driver has ceased performing safety-sensitive functions.

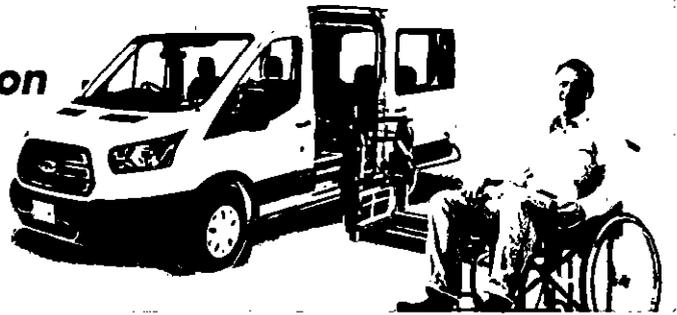
b. The Company shall select drivers for testing using a random number table or a computer based random number generator that is matched with the drivers' social security numbers, or other comparable identification numbers which will ensure that each driver has an equal chance of being tested each time selections are made.

c. All random tests will be unannounced and the dates for administering the tests will be spread reasonably throughout the calendar year. The dates of random testing, locations and names of those to be tested are kept in the strictest confidence by the Program Administrator and the specimen collector.

d. Each driver who is notified of selection for random drug or alcohol testing must proceed to the test site immediately. If the driver is performing a safety-sensitive function (refer to section 2.8) at the time of notification, the driver must cease performing the safety-sensitive function and proceed to the test site as soon as possible, but not longer than two hours from the time of notification. Drivers who do not proceed to the test site immediately upon notification of the test may be considered to have refused to submit to the test.

### 4.4 Reasonable Suspicion Drug and/or Alcohol Testing:

## Care and Transportation You Can Trust



- a. A driver must submit to a reasonable suspicion drug and/or alcohol test whenever a manager or supervisor has reasonable suspicion to believe that the driver has violated the drug or alcohol prohibitions contained in this policy. Reasonable suspicion drug tests may be conducted at any time. Reasonable suspicion alcohol tests may be conducted only while the driver is performing safety-sensitive functions, just before the driver performs safety-sensitive functions, or just after the driver has ceased performing safety-sensitive functions.
- b. Reasonable suspicion determinations will be based on specific, contemporaneous, articulable observations concerning the driver, including but not limited to the driver's appearance, behavior, speech, or body odors. For drug testing, the observations may also include indications of the chronic and withdrawal effects of drugs.
- c. Documentation of the observations leading to a reasonable suspicion test will be prepared and signed by the supervisor or manager who made the observations. The supervisors and managers who make reasonable suspicion determinations must have received training on alcohol misuse and controlled substances use in accordance with FMCSA's regulations. The supervisor or manager who makes a reasonable suspicion determination will not conduct the drug or alcohol test.
- d. A driver who is directed to take a reasonable suspicion drug and/or alcohol test must submit to the test as directed. The Company shall transport or ensure the transport of the driver both to and from the collection site.
- e. **A driver who is requested to submit to a reasonable suspicion drug and/or alcohol test will be suspended after the completion of the tests. The Company also reserves the right to evaluate the conduct of the driver which warranted the reasonable suspicion drug or alcohol tests to determine if the conduct in and of itself should warrant corrective action up to and including termination.**

### 5.0 SELF-IDENTIFICATION OF SUBSTANCE ABUSE PROBLEM

5.1 Consistent with and subject to the Company's policies concerning medical and personal leaves. A driver who voluntarily self-identifies himself or herself as having a drug or alcohol problem and requests assistance for such a problem will be referred to a substance abuse professional ("SAP for an evaluation and, if recommended, appropriate counseling, treatment or rehabilitation program. The cost of counseling, treatment, or rehabilitation is the driver's

responsibility. (For further details concerning the employee's payment obligations, employees

## Care and Transportation You Can Trust



should refer to their medical insurance plan.)

**5.2 This request must be made before the driver is directed or otherwise required to submit to a drug or alcohol test required by DOT or this policy or before the driver has been found to have violated a prohibition contained in this policy.**

5.3 Once leave commences, periodic certification that the employee is actively continuing to participate in the program, together with progress reports, shall also be required. As a further condition of taking such leave, the employee will be required to authorize the attending SAP to communicate directly with the company, including releasing the employee's relevant treatment records to the Company, except as federal or state law may otherwise require. All such oral and written communications between the substance abuse professional and Company shall be treated as confidential.

5.4 Except where the federal or state law prohibits, all leave time taken for the evaluation, counseling, treatment or rehabilitation will be counted against the leave to which the employee may be entitled under the federal or state Family and Medical Leave laws.

5.5 Before the time such leave begins, the driver will be required to execute the company's "Agreement for Evaluation and Conditions for Continued Employment." This agreement provides, among other things, that before a driver will be permitted to return to his/her driving duties or perform other safety-sensitive functions for the Company, the driver will be required to submit to a post-voluntary rehabilitation return-to-duty drug test and/or a post-voluntary rehabilitation return-to-duty alcohol test and must receive a negative result. The agreement also provides that the driver may be required to submit post-voluntary rehabilitation follow-up drug tests and/or post-voluntary rehabilitation follow-up alcohol tests after returning to work, if directed by the treating substance abuse professional. Any return-to-duty and follow-up drug and/or alcohol tests performed under this section of the policy will be conducted as permitted by and in accordance with the applicable state or local law, if any. Where there is no applicable state or local law Or where such laws do not provide specific detailed procedures governing such testing, the Company will follow the Federal Procedures for Transportation Workplace Drug and Alcohol Testing Programs, 49 C.F.R. Part 40, as amended.

### **6.0 DRUG AND ALCOHOL TESTING PROCEDURES**

As required by the FMCSA's rules, the Company's drug and alcohol testing procedures comply with the Federal Procedures For Transportation Workplace Drug and Alcohol Testing Programs, 49 C.F.R. Part 40, as amended. (A copy may be obtained from the Program Administrator). These procedures ensure the integrity, confidentiality and reliability of the testing processes, safeguard the validity of the test results and ensure that these results are attributed to the correct driver. Further, these procedures minimize the impact upon the privacy and dignity of people undergoing such tests. The following provides a summary of the federal procedures.

## Care and Transportation You Can Trust



### 6.1 Drug Testing Procedures:

**a. Drugs being tested for:** The drugs specifically being tested for include marijuana, opiates, amphetamines, cocaine, and phencyclidine (PCP) and their metabolites.

**b. Chain-of-custody and laboratory:** For purposes of conducting drug tests, the Company has established a chain-of-custody procedure for the collection and analysis of urine samples that will verify the identity of each sample and test result. All drug tests conducted pursuant to this policy shall be performed by laboratories, which are certified by the Department of Health and Human Services ("DHHS").

**c. Confirmation, review, and verification of drug test results:**

1. All positive drug test results will be confirmed by gas chromatography and mass spectrometry (GC/MS). All confirmed positive drug test results will be reviewed by a medical review officer ("MRO") to determine whether there is any legitimate explanation for the positive test result. This review may include a medical interview, review of the applicant's or driver's medical history, or review of any other relevant biomedical factors and all medical records made available by the tested individuals.

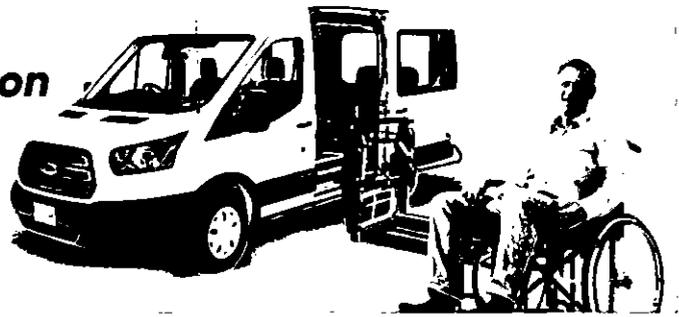
2. Individuals testing positive will be allowed to discuss with the MRO any legitimate explanation for the positive test result. If, after speaking with the driver, the MRO determines that there is a legitimate medical explanation for the confirmed positive test result, the MRO will report the test result as "negative" to the Program Administrator. If the

MRO determines that there is no legitimate explanation for the confirmed positive test result, the result will be verified as a "verified positive test result" by the MRO.

3. Under the circumstances outlined in 49 C.F.R. Part 40, the MRO is permitted to verify a test result as a verified positive without having first communicated directly with the driver. If serious illness, injury, or other unavoidable circumstances prevented the driver from being contacted by the MRO or the Program Administrator, however, the MRO may reopen the verification process to permit the driver to provide information concerning a legitimate explanation for the positive test. (Refer to Section 3.1.j. of the policy concerning the driver's duty to remain in contact with the Company and MRO.

4. All adulterated or substituted test results will be reviewed by the MRO to determine whether there is any legitimate medical explanation for the laboratory findings. It is the applicant or driver's burden of proof to show that there is a legitimate medical explanation. If the MRO determines that the applicant's or driver's explanation does not present a reasonable basis for concluding that there is a legitimate medical explanation, the MRO will

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report the test to the Program Administrator and the individual tested as a verified refusal to submit to a test because of adulteration or substitution, as outlined in Section 3.2.j. (Refer to Section 7.2 for the consequences of a refusal to submit to a test). If, however, the MRO believes that the applicant's or driver's explanation may present a reasonable basis for concluding that there is a legitimate medical explanation, the MRO shall direct the applicant or driver to obtain, within five days of the MRO's verification interview of the applicant or driver, a further medical evaluation. This evaluation must be performed by a licensed physician acceptable to the MRO, with expertise in the issues raised by the applicant's or driver's explanation. The Company and the MRO are not responsible for finding or paying for a referral physician. However, on the request of the applicant or driver, the Company or MRO will provide reasonable assistance to the applicant's or driver's efforts to find such a physician. If, after conferring with the referral physician, the MRO concludes that there is a legitimate medical explanation, the MRO will cancel the test and report the cancellation and the reasons for it to the Program Administrator and the tested individual. If, after conferring with the referral physician, the MRO concludes that there is no legitimate medical explanation, the MRO will notify the Program Administrator and the tested individual of a

verified refusal to submit to a test because of adulteration or substitution, as set forth in Section 3.2.j. (Refer to Section 7.2 for the consequences of a refusal to submit to a test)].

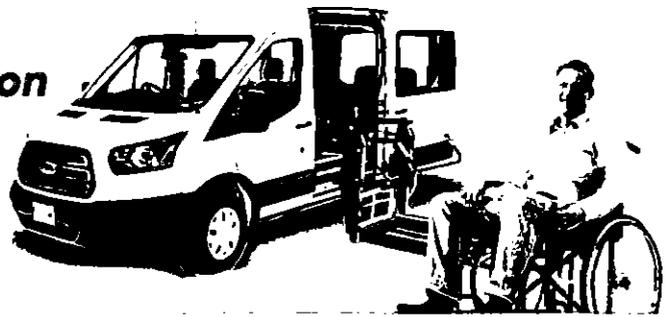
**5. As of August 1, 2001, if the MRO reports to the Company that a negative drug test was diluted, it will be accepted as a negative result.**

**6. Right to have split sample analyzed:**

(a) **Verified Positive Tests:** All applicants and drivers whose primary urine sample is verified positive have the right to request that their split sample be analyzed in a different DHHS-certified laboratory, selected by the Company, for the presence of the drug(s) for which a positive result was obtained. The request must be made to the MRO within 72 hours of being notified by the MRO of a verified positive test result. If the split sample fails to reconfirm the presence of the drug(s) found in the primary sample, or if the split sample is unavailable, inadequate for testing, or untestable, the MRO shall cancel the test and report the cancellation and the reasons for it to the Program Administrator, the tested individual, and the DOT. However, if the split-sample reconfirms the presence of the drug(s) or drug metabolite(s), the MRO will notify the Program Administrator and the tested individual of the test results.

(b) **Verified Adulterated or Substituted Tests:** All applicants and drivers whose primary urine sample is verified adulterated or substituted have the right to request that their split

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sample be analyzed in a different DHHS-certified laboratory, selected by the Company, to reconfirm the adulterated or substituted result. The request must be made to the MRO within 72 hours of being notified by the MRO of a verified adulterated or substituted test result. If the split-sample fails to reconfirm adulteration or substitution of the primary sample, the MRO shall cancel the test and report the cancellation and the reasons for it to the Program Administrator and the tested individual. Additionally, if the split-sample is unavailable, inadequate for testing, or untestable, the MRO shall cancel the test and report the cancellation and the reasons for it to the Program Administrator and the tested individual. The Program Administrator shall ensure the immediate collection of another specimen from the applicant or driver under direct observation (see Section 6.1.c.8), with no notice given to the applicant or driver until immediately before the collection. However,

if the split sample reconfirms adulteration or substitution, the MRO will notify the Program Administrator and the tested individual of the test results. Reconfirmation of adulteration or substitution constitutes a refusal to submit to a test, as outlined in Section 3.2.j. (Refer to Section 7.2 for the consequences of a refusal to submit to a test).

**7. Inability to provide an adequate amount of urine sample:** Applicants and drivers must provide a urine sample of at least 45 milliliters of urine for a drug test. If the tested individual is unable to provide such a quantity of urine, then the tested individual will be instructed to drink a set amount of fluids for over three hours and again attempt to provide a complete sample. If the applicant or driver refuses to attempt to provide a new urine specimen, this will constitute a refusal to submit to a test, and the driver will be terminated, and the applicant will be ineligible for employment with the Company. If the applicant or driver has not provided a sufficient specimen within three hours of the first unsuccessful attempt to provide the specimen, the collection will be discontinued. The Program Administrator, after consulting with the MRO, will then direct the applicant or driver to obtain, within five working days, a medical evaluation. Failure to undergo such an evaluation constitutes a refusal to test. The purpose of the evaluation is to determine whether the applicant or driver has a medical condition that has, or with a high degree of probability could have, precluded the applicant or driver from providing a sufficient amount of urine. If the physician determines that there is no legitimate medical explanation for the driver's failure to provide an adequate amount of urine, this will constitute a refusal to submit to a test and the driver will be terminated.

**8. Privacy; Limitations:** Procedures for collecting urine samples allow individual privacy unless there is a reason to believe that a particular individual has adulterated or substituted, or attempted to adulterate or substitute, the sample, as defined in the Federal Procedures For Transportation Workplace Drug Testing Programs, 49 C.F.R. Part 40. In such cases, a

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sample may be obtained under the direct observation of a specimen collector of the same gender as the individual being tested. In addition, effective August 1, 2001, DOT regulations require the Company to direct an immediate collection under direct observation with no advance notice to the applicant or driver, if:

- (a) the laboratory reported to the MRO that a specimen is invalid, and the MRO reported to the Company that there was not an adequate medical explanation for the result; or
- (b) the MRO reported to the Company that the original positive, adulterated, or substituted test result had to be canceled because the test of the split specimen could not be performed.

The Company also may direct a collection under direct observation of a driver if the drug test is a return-to-duty test or a follow-up test.

### 6.2 Alcohol Testing Procedures:

**a. How test will be performed:** Alcohol screening tests will be performed by a screening test technician ("STT") using a non-evidential screening device, or by a breath alcohol technician ("BAT") using an evidential breath testing device ("EBT"). The Company ensures that the STTs are proficient in the operation of non-evidential screening devices and that the BATs are proficient in the operation of EBTs. In addition, the Company uses only non-evidential alcohol screening devices and EBTs, which are listed on the conforming products list issued by the National Highway Traffic Safety Administration.

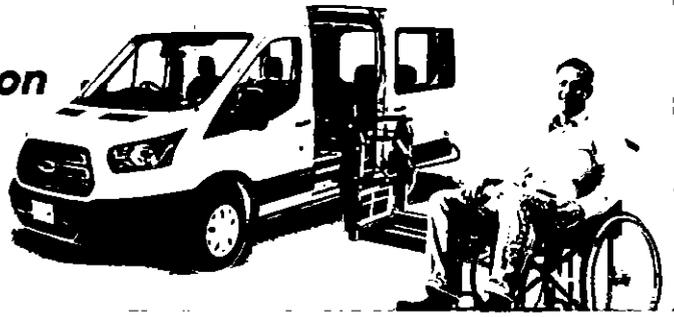
**b. Confirmation of alcohol test results:** If the result of the screening test is an alcohol concentration of 0.02 or greater, a confirmation test will be performed using an EBT. The confirmation test will be conducted within 15 to 30 minutes from the end of the screening test. The confirmation test result is the final result upon which any corrective action or other action taken under the Company's policy shall be based.

#### **c. Inability to provide adequate amount of specimen for alcohol testing:**

1. If a driver fails to provide or claims that he or she is unable to provide a sufficient amount of breath to permit a valid breath test, the Company will direct the driver to obtain, within five days, an evaluation from a licensed physician who is acceptable to the Company and who has expertise in the medical issues raised by the driver's failure to provide a sufficient specimen. Failure to undergo such an evaluation constitutes a refusal

to test. If the physician concludes that a medical condition has, or with a high degree of

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probability could have, precluded the driver from providing a sufficient amount of breath, the driver's test will be canceled. If the physician concludes that there is not an adequate basis for determining that a medical condition has, or with a high degree of probability could have, precluded the driver from providing a sufficient amount of breath, the driver will be considered to have refused to test.

### 7.0 CONSEQUENCES FOR POLICY VIOLATIONS

The consequences discussed below apply to applicants and drivers who are found to have violated this policy. Regardless of the corrective action imposed, however, FMCSA's regulations require drivers who engage in any prohibited conduct under this policy to be advised of available resources for evaluating and resolving problems associated with drug use and alcohol misuse, including the names, addresses, and telephone numbers of substance abuse professionals and counseling and treatment programs. This information will be provided through the Company's Human Resources Department.

**7.1 Automatic Removal From Safety-Sensitive Functions:** DOT's and FMCSA's regulations require drivers who violate this policy in any way to be immediately removed from their safety sensitive functions. Such drivers are prohibited from performing, or being permitted to perform, a safety-sensitive function, including driving Company vehicles.

**7.2 Refusal To Submit:** Any driver who refuses to submit to a test will be terminated. Applicants who refuse to submit to a test will be ineligible for employment with the Company. Refer to section 3.2 concerning what actions will constitute a driver's "refusal to submit."

#### 7.3 Positive Test Results:

**a. Applicants:** All applicants who receive a verified positive drug test result will be ineligible for employment with the Company.

#### b. Drivers:

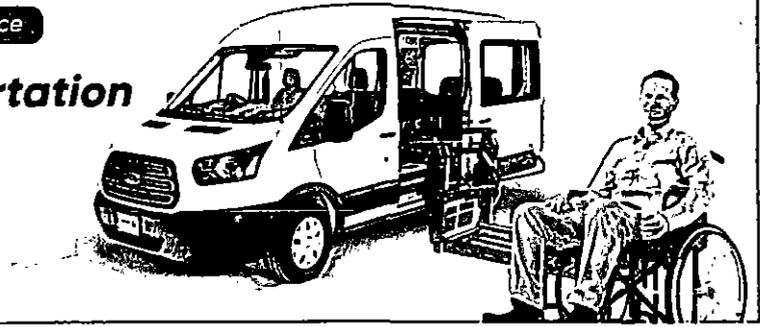
**1. Temporary suspension:** Any driver who is required to submit to a reasonable suspicion drug or alcohol test, or a post-accident drug and alcohol test were the Company has reason

to suspect that the driver was under the influence of drugs or alcohol, will be temporarily suspended.

**2. Drivers who test positive for the first time:** If a driver receives a verified confirmed positive drug test, or a confirmed alcohol test of 0.04 or greater, for the first time:

**a.** A driver who has been employed by the Company for one (1) year or more, calculated

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from the last date of hire, will be offered an opportunity to sign and comply with the Company's "last chance" agreement. This Agreement provides a driver with the opportunity to be evaluated for a drug or alcohol problem by a substance abuse professional and, if determined to be necessary by the evaluating substance abuse professional, to participate in a counseling, treatment, or rehabilitation program, whichever is determined to be more appropriate by the substance abuse professional. The cost for the evaluation and any counseling, treatment or rehabilitation will be paid at the driver's own expense to the extent it is not covered by Strober's health insurance provider (see Section 8.0). A driver may also be subject to return-to-duty and follow-up testing. However, the driver will be terminated if the driver: (i) refuses to participate in a Company-sponsored evaluation, and if recommended, a counseling, treatment, or rehabilitation program, or (ii) fails to complete successfully the recommended counseling, treatment or rehabilitation program, as evidenced by the driver's withdrawal from or refusal to cooperate with the counseling, treatment, or rehabilitation before its completion, or by a positive test result during or after completion of the program.

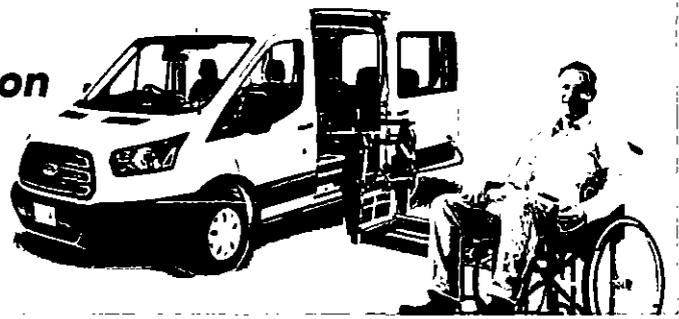
b. A driver who has been employed by the Company for less than one (1) year, calculated from the last date of hire, will be terminated.

3. Drivers who test positive a second time: Any driver who receives a confirmed positive drug test result or a confirmed alcohol test result of 0.04 or greater, for a second time, will be terminated from employment.

4. Positive alcohol test results of 0.02 or greater but less than 0.04: A driver who receives a confirmed alcohol test result of 0.02 or greater, but less than 0.04, for the first time, will be suspended for at least 24 hours. A driver who receives a confirmed positive alcohol test result of 0.02 or greater for a second time will be terminated.

5. Fitness-for-duty evaluation in the event of driver's legal and authorized use of a controlled substance: Whenever an employee is required to submit to a reasonable suspicion drug test and receives a positive test result caused by the employee's legal and authorized use of a controlled substance, the Company will require the employee to submit to a fitness-for-duty evaluation. An employee who tests negative may also be required to submit to a fitness-for-duty evaluation. The evaluation may include a review of the employee's medical records and/or a medical examination. The purpose of the evaluation is to determine whether the employee poses a significant risk of substantial harm to the health and safety of the employee or others in the workplace, including customers and visitors. Employees will be required to provide the necessary authorizations for obtaining the medical records and conducting the examination. Depending upon the results of the evaluation, the Company

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will consider whether the safety or health risk can be eliminated or sufficiently reduced by a reasonable accommodation, if applicable.

7.4 Other Policy Violations: Drivers who commit policy violations other than those addressed in Sections 7.2 and 7.3 above will be subject to corrective action, up to and including, immediate termination. Applicants who violate this policy will be ineligible for employment with the Company.

7.5 Potential Forfeiture of Workers' Compensation and/or Unemployment Compensation Benefits: For purposes of this policy violations of DOT's and FMCSA's regulations and/or the requirements of this policy constitute gross and willful misconduct. In addition to the corrective action and other consequences imposed by DOT, FMCSA and the Company under this policy, such gross and willful misconduct may also result in the denial of unemployment compensation under applicable state law. In addition, drivers who are injured as a result of a violation of DOT-s or FMCSA's regulations and/or the Company's safety rules (including but not limited to the conduct prohibited under this policy) may also forfeit workers' compensation benefits under applicable state law.

### 8.0 NOTIFICATION OF TEST RESULTS

Applicants will be notified of the results of a pre-employment drug test, if the applicant requests his/her test results within 60 days of being notified of the disposition of the employment

application. Drivers will be advised of drug test results that are verified positive and the drug or drug(s) for which a positive result was verified. Drivers will be notified of the results of their alcohol tests immediately after the administration of the screening test and, if necessary, the confirmatory test.

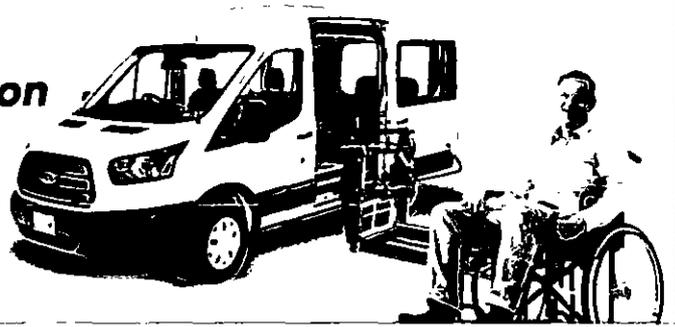
### 9.0 TESTING EXPENSES AND COMPENSATION FOR TESTS

The Company will pay for drug and alcohol tests and related expenses as follows:

9.1 All drug and alcohol tests required to be taken by drivers or applicants under this policy, including confirmation tests, but excluding return to duty tests and follow-up tests, will be paid for by the Company. Any test taken at a driver's or applicant's request will be at the driver's or applicant's expense, unless the result of the test is negative. However, compliance with an applicant's or driver's request for a split sample test will not be conditioned on the driver's or applicant's direct payment to the MRO or laboratory or the driver's or applicant's agreement to reimburse the Company for the costs of testing.

9.2 All time spent by drivers providing a specimen required under this policy, including travel

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13.0 Employee Screening for Exclusion Policy (LEIE, EPLS, & Medi Check)

Humane Care Transportation Services LLC shall screen all employees, contractors, vendors, service providers, and entities directly associated with HUMANE CARE TRANSPORTATION SERVICES LLCS for exclusion before employing and/or contracting with them. If hired, they shall be re-screened on an ongoing monthly basis to determine if they have been excluded. (HUMANE CARE TRANSPORTATION SERVICES LLCS) shall check the Medi check list, OIG LEIE, and GSA EPLS monthly, as well as any state Medicaid exclusion databases for any other state appearing on the individual's resume for exclusion.

HUMANE CARE TRANSPORTATION SERVICES LLCS shall report any discovered exclusion of an employee or contractor, or individual entity, to the Bureau of Program Integrity. (HUMANE CARE TRANSPORTATION SERVICES LLCS) shall develop and maintain auditable documentation of screening efforts, including the dates the screenings were performed and the source data checked and its dates of the most recent updates. HUMANE CARE TRANSPORTATION SERVICES LLCS shall periodically conduct self-audits to determine compliance with screening for exclusion requirements

Humane Care Transportation Services LLC shall use the database contained in MAB 99-11-05 for exclusion screening

Employee Name: .....

Signature: .....

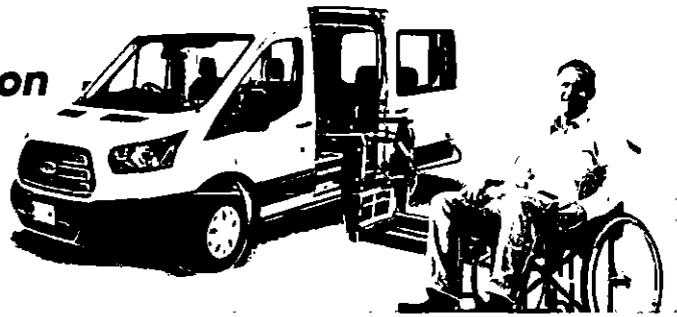
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Definitions

LEIE - List of excluded individuals and entities, Excluded individuals/Entities

GSA - - - General Services AdministraEPLS - - - Excluded Parties List System

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time to and from the collection site, will be considered as on-duty time.

### 10.0 RECORDKEEPING, ACCESS TO RECORDS, AND CONFIDENTIALITY OF TEST RESULTS

10.1 The Company will maintain records related to its drug and alcohol-testing program as required by the DOT's and FMCSA's regulations. These records will be maintained in a secure location with controlled access and will not be released to any person except as required by law or expressly authorized by the driver.

10.2 The laboratory may disclose drug test results only to the MRO. The MRO, STT and BAT may disclose test results only to the individual tested, the Program Administrator, a treatment program, or a court of law or administrative tribunal to the extent required by law. Beyond that, a driver's test results shall not be released to any person without the individual's written consent.

### 11.0 INSPECTIONS

11.1 Inspections Of Company Property: The Company may conduct unannounced random inspections for drugs and alcohol on Company facilities and property such as, but not limited to, Company vehicles, desks, file cabinets, and Company-issued employee lockers. Drivers are expected to cooperate in the conduct of such inspections. Inspections of Company facilities and property may be conducted at any time and need not be based on reasonable suspicion.

11.2 Inspections Of Driver Property: Inspections of drivers and their personal property such as, but not limited to, vehicles, clothing, packages, purses, brief cases, lunch boxes, or other containers brought onto or being taken off of Company premises may be conducted when there is reasonable suspicion to believe that the driver may have or has violated the drug or alcohol prohibitions contained in this policy.

### 12.0 EMPLOYEE ASSISTANCE AND REFERRAL

As part of the Company's commitment to provide a safe, healthy and efficient working environment for our employees, we offer employees information and referrals through our health insurance provider. We provide information concerning the effects and consequences of alcohol and drug use on an individual's health, work, and personal life and the signs and symptoms of an alcohol or drug problem. In addition, our health insurance provider offers referral services to drivers and their families seeking help with problems resulting from alcohol misuse and drug use. Participation in this program is voluntary and confidential. Our health insurance provider can discuss available counseling, treatment and rehabilitation programs, fiscal responsibilities, and can help the employee decide what program might be best for his or her situation.

*Humane Care Transportation Service*

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**DPW** - - - Department of Public Welfare  
**OIG** - - - Office of Inspector General  
**MA** - - - Medical Assistance

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PENNSYLVANIA PUBLIC UTILITY COMMISSION  
(PUC)  
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400 NORTH STREET  
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