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May 27, 2016

Dr. B.J. Arseneau Medical Officer Federal Railroad Administration 1200 New Jersey Avenue. S.E. Washington, D.C. 20590

Dear Dr. Arseneau,

A revised Critical Incident Stress Plan (CISP) is attached, together with Appendix A. Proof of service is also attached.

The changes requested in your May 20th email to me have been made. Additional conforming changes were also made to the attached plan and to Appendix A to address your concerns regarding the supervisory role and level 2 training. I believe FRA has misunderstood our anticipated role of the supervisor, which was supportive only and not meant in any way to act as clinical or counseling services. Nevertheless, the requested changes have been made.

Very truly yours,

Karin L. Stam

Norfolk Southern Railway Company

Critical Incident Stress Program

Purpose of Program

The Critical Incident Stress Program (CISP) is intended to promote safe rail operations and the health and safety of railroad employees by helping employees exposed to traumatic on-duty incidents identify and cope with their responses to these events. The focus of the CISP is to provide support and relief, if needed, for incident-related stress, particularly that arising from emergency situations.

What is a critical incident?

A critical incident is defined in 49 CFR 272.9 as:

(1) An accident/incident reportable to FRA under 49 CFR part 225 that results in a fatality, loss of limb, or similarly serious bodily injury; or (2) A catastrophic accident/incident reportable to FRA under 49 CFR part 225 that could be reasonably expected to impair a directly-involved employee's ability to perform his or her job duties safely.

Who does this program apply to?

The CISP applies to NS employees:

- 1. Whose actions are closely connected to a critical incident
- 2. Who witnesses a critical incident in person as it occurs or who witnesses the immediate effects of a critical incident in person; or
- 3. Who is charged to directly intervene in, or respond to, a critical incident (excluding railroad police officers or investigators who routinely respond to and are specially trained to handle emergencies..

The forgoing applies to employees operating or working on another railroad's track.

Goals of the CISP

- Reduce the impact on employees exposed to traumatic incidents.
- Increase recovery and reduce the effects of harmful stress.
- Encourage follow-up and support among management and employees.

- Promote a culture of concern for affected employees.
- Provide additional resources for assistance when needed.
- Train employees in the Plan.
- Ensure employees are aware of relief options after critical incidents.

What happens when a critical incident occurs?

Employees directly involved in a critical incident are encouraged to seek assistance from their supervisor, through Norfolk Southern's (NS) behavioral counseling services or by contacting NS Medical Department Internal Employee Assistance Program (EAP) counselors. Contact information is provided in Appendix A. NS Internal EAP counselors are trained in critical incident stress response, and are available 24 hours a day, seven days a week. In addition, employees who are identified as being directly involved in a critical incident may be contacted by NS Medical Department Internal EAP counselors for follow-up support.

Directly involved employees may request:

- Relief from the balance of a tour of duty during which a critical incident occurred, following completion of any actions necessary for the safety of persons, and any documentation needed at the time of the incident;
- Timely transportation to the home terminal (i.e. the employee's regular reporting point at the beginning of the tour of duty);
- Counseling, guidance and other support services from NS internal EAP counselors or through NS's behavioral counseling services;
- Relief from additional duty tours for up to three days; and
- Such additional leave from normal duty as may be necessary and reasonable to receive preventive services or treatment related to the incident or both, provided the employee's clinical diagnosis supports the need for additional time off or the employee is in consultation with a health care professional related to the incident and such health care professional supports the need for additional time off in order for the employee to receive preventive services or treatment related to the incident, or both.

Supervisors must remind directly involved employees of the options for support and/or relief as detailed above, and allow or facilitate such support or relief consistent with this Program. This reminder should be provided as soon as practicable, such as during early communications with the employee before the employee has already continued with his or her tour of duty.

Employees covered by this Program will receive training on the Program.

Training

Agreement employees covered by this Program will receive initial training on the Program, and refresher training as appropriate.

Transportation, mechanical and engineering field supervisors who have direct contact with and manage agreement employees will receive training on the requirements of the Program and in basic critical incident stress response. Refresher training will be performed as appropriate.

Program Coordination

This Program is managed by the Safety & Environmental Department, working in conjunction with the Transportation, Engineering, Mechanical, Labor Relations, Medical and Law Departments.

Program Administration

This program is administered by Norfolk Southern's Assistant Vice President Safety & Environmental, who has primary responsibility for implementing the Plan.

Employee Resources

Employees may use any of these resources to aid in coping with the aftermath of a critical incident:

- Front line supervisors Field managers directly involved with affected employees who are trained in NS's critical incident stress plan.
- NS Medical Department internal EAP counselors (see Appendix A), who are available 24/7 by contacting 1-844-215-4188.
- NS employee behavioral counseling services (see Appendix A).

Appendix A

Norfolk Southern Railway

Counseling and Other Support Resources

All employees are encouraged to use the following support services when needed to help them cope in the aftermath of a critical incident:

All Employees:	NS Medical EAP Counselors 844-215-4188
Agreement Employees (except Wabash):	United Health Care 866-850-5212
Agreement Employees - Wabash only:	Wabash Hospital Association Employees must first contact their Primary Care physician for a referral.

Wabash Agreement employees are train & engine, maintenance of way, signalmen and some shopcrafts (BRC, IAM, IBEW and F&O) employees working on portions of the Lake, Illinois and Dearborn Divisions.

Non-agreement Employees:

Value Options 866-579-8758

Statement Pursuant to 49 CFR 272.103(b)(2)

In compliance with 49 CFR 272.103(b)(1), the parties identified on the attached Critical Incident Stress Plan Service List were mailed a copy of Norfolk Southern Railway's Critical Incident Stress Plan as submitted to FRA on June 19, 2015 and amended on December 17, 2015, March 23, 2016 and May 27, 2016. Copies were mailed to such parties on May 27, 2016 via United Parcel Service overnight mail.

Dated: May 27, 2016

By:

Karin L. Stamy System Director Safety Norfolk Southern Railway Company