

RESOLUTION NO. _____

**RESOLUTION APPROVING REVISIONS TO THE SYSTEM SAFETY PLAN (SSP)
FOR MOUNTAIN MOBILITY, BUNCOMBE COUNTY'S COMMUNITY TRANSPORTATION SYSTEM**

- WHEREAS, the strategic safety goals of the Federal Transit Administration and the North Carolina Department of Transportation (NCDOT) promote the public health and safety by working toward the elimination of transportation related deaths, injuries and property damage; and
- WHEREAS, the Federal Transit Administration and the National Transportation Safety Board require the reporting of certain transportation related accidents;
- WHEREAS, the vision for public transportation services in North Carolina includes the provision of safe, affordable transportation choices, statewide, to those who have travel options and to those whose options are limited;
- WHEREAS, the development and implementation of System Safety Plans by Community Transportation systems is a fundamental step toward these goals and vision, and the North Carolina Board of Transportation requires Community Transportation Systems like Mountain Mobility that receive federal and/or state funds to have an approved System Safety Plan which includes provision for local system safety data collection and reporting; and
- WHEREAS, the Buncombe County Board of Commissioners adopted the System Safety Program Plan (now System Safety Plan) for Mountain Mobility on July 20, 2004, and has approved subsequent revisions to the plan as needed; and
- WHEREAS, the System Safety Plan outlines requirements necessary to ensure continuation of operations in six core areas, including driver/employee selection, training, safety data acquisition analysis, substance abuse program, vehicle maintenance, and security; and
- WHEREAS, the Board of Commissioners feels it is in the best interests of the citizens of Buncombe County to support and approve the policies and elements presented in the revised System Safety Plan for Mountain Mobility.

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners for the County of Buncombe as follows:

1. That the Buncombe County Board of Commissioners hereby approves the attached revisions to the System Safety Program (SSP) for Mountain Mobility, Buncombe County's Community Transportation System.
2. That this Resolution is effective upon its adoption.

Adopted this ____ day of _____, 2019.

ATTEST:

BOARD OF COMMISSIONERS
FOR THE COUNTY OF BUNCOMBE

Lamar Joyner, Clerk to the Board

By: _____
Brownie Newman, Chairman

APPROVED AS TO FORM:

County Attorney



Mountain Mobility System Safety Plan 2019 Annual Management Review Report

Background and General Information

The current Mountain Mobility System Safety Plan (SSP) was adopted by the Buncombe County Board of Commissioners on March 4, 2014 (as an update to the June 2004 SSP). Community Development Division staff and Mountain Mobility Operations management staff conduct ongoing reviews of the SSP. An annual review is also conducted to ensure the SSP information is current and reflects the changing system needs. The first annual review occurred in April 2015. The most recent annual review occurred in May 2018.

Mountain Mobility Operations management staff recommend revisions to the SSP to reflect current information, training, and operational procedures and practices. These recommended revisions are communicated through an *Annual SSP Review Report*. Community Development Division staff process the *Annual SSP Review Report* and its proposed revisions to ensure they are both appropriate and reasonable.

In April 2019 the NCDOT conducted a Proficiency Review (comprehensive system audit). The SSP was reviewed as part of the Proficiency Review. The Proficiency Review was completed in June 2019 and Buncombe County was found to be deficiency free. The Proficiency Review did not suggest any SSP modifications were necessary to remain compliant with state and federal regulations. Community Development Division staff did not move forward with any SSP revisions until completion of the Proficiency Review in the event any modifications to the SSP were requested by NCDOT through the process.

SSP revisions were presented to the Buncombe County Community Transportation Advisory Board (CTAB) at its quarterly meeting on August 26, 2019.

SSP Reports and Analyses

Community Development Division staff conduct ongoing reviews of Mountain Mobility Operations' administration of the SSP. There were no issues related to Mountain Mobility Operations' administration of the SSP since the last annual review (May 2018 through August 2019).

Reports/analyses required in the SSP and by the Mountain Mobility operations contract were completed and submitted to the Community Development Division as required, including:

- Monthly Employee Reports showing operations personnel and hiring, licensing, MVR and background checks, with documentation on any new hires during the month
- Vehicle Operator Turnover Reports (Monthly)
- Vehicle Operator Training Reports (Monthly)
- Drug and Alcohol Testing Reports (Monthly) and DAMIS Reports (Annual)
- Incident Investigations and Analysis Reports
 - Accident/Incident/Safety and Security Complaints Reports (Monthly)
 - Safety Data and Trend Analysis Reports (Monthly)
 - Safety Meeting Reports (Quarterly)
- Inspection Reports and Identification of Hazardous or Safety Issues
 - Hazard Assessment Report (Annual)
 - Employee Safety Committee Meeting and Facility Inspection Report (Quarterly)
 - OSHA Inspection Report (Annual)
 - Workplace Security Assessment (Annual)
 - Internal Safety Audit (Annual)
- Vehicle-Related Reports
 - NC State Inspections Report (Monthly)
 - Vehicle PM Compliance Report (Monthly)
 - Wheelchair Lift PM Compliance Report (Monthly)
 - Current Miles and PM Due Mileage Report (Monthly)
 - Mileage and Breakdown Report (Monthly)
 - Vehicle Inspection Forms for Inspections by Buncombe County General Services/Garage (Weekly)

Community Development Division staff maintain a compliance checklist and issues a monthly Certification of Review form that summarize compliance and inspection reports and supporting documentation reviewed. Certifications of Review records are maintained on file.

Conclusion

The SSP will be updated immediately following approval of the revisions by the Buncombe County Board of Commissioners. The 2019 Annual Management Review Report, August 2019 Annual SSP Review Report, and a revised SSP will be submitted by Buncombe County to the NCDOT Public Transportation Division as required.





Mountain Mobility System Safety Plan August 2019 Annual SSP Review Report

The Mountain Mobility System Safety Plan (SSP) outlines the following with regard to revisions:

The SSP will be updated as changes occur. An annual review is required to ensure all information is current. The annual review and updates will be reviewed by the Community Transportation Advisory Board, adopted by the Buncombe County Board of Commissioners, and certified by NCDOT PTD. The SSP should reflect the changing needs of Mountain Mobility programs. As a public transportation system evolves and operates, it must consistently monitor the programs and update the SSP accordingly.

To ensure that this occurs, the management operations staff will be responsible for preparing an annual report that assesses the adequacy and effectiveness of all phases of the SSP. Members of a SSP Review Committee, as well as system managers, are jointly responsible for maintaining and updating the SSP. The annual report will be submitted to Buncombe County for review and revisions, if needed, and the final annual report will be submitted to the Community Transportation Advisory Board for review and the Buncombe County Board of Commissioners for approval. A copy of the approved annual report will be submitted to NCDOT PTD Safety & Training Unit.

Report topics will include:

1. Results of incident investigations and analysis
2. Identification of possible hazardous conditions
3. Results of inspections
4. Established plans for handling future incidents
5. Analysis of departmental involvement in the administration of the SSP
6. Recommendations for SSP revisions

Below is a summary of these efforts as conducted May 2018 through August 2019.

1. Results of Incident Investigations and Analysis

This effort is ongoing and conducted regularly through the documentation of incidents which are reported to Buncombe County, NCDOT, and NTD. Trends are analyzed and actions are taken to prevent future incidents through retraining, hazard elimination, etc. as outlined by the SSP.

2. Identification of Possible Hazardous Conditions

This effort is ongoing and conducted regularly through the documentation of incidents, completion of OSHA inspections, conducting of Safety Committee Meetings and other efforts as outlined in the SSP. All of these items are reported to Buncombe County. Trends are analyzed and actions taken to eliminate possible hazardous conditions.



3. Results of Inspections

All safety related inspections are maintained on record and provided to Buncombe County during requested reporting time periods.

4. Established Plans for Handling Future Incidents

Where analysis reveals a causal trend, policy and/or procedure will be put into place and/or practice to handle future incidents, including hazardous conditions. Any policies and procedures which are enacted are communicated to Buncombe County and, as appropriate, included in the next annual update of the SSP (See item 6).

5. Analysis of Departmental Involvement in the Administration of the SSP

All staff of Mountain Mobility Operations take an active role in execution of the SSP. The Safety/Training Manager, Fleet Manager, Operations Manager, and General Manager are involved in the administration of the SSP. Dispatchers, operators, schedulers, and operations' administrative staff also assist in administration, as described by the SSP. The SSP must be supported and implemented at all levels and involvement is as anticipated and required.

6. Recommendations for SSP revisions

The Mountain Mobility Operations staff (General Manager and other staff) participate in an ongoing review of the SSP. The General Manager began a more formal review of the SSP in March 2019. The Mountain Mobility Safety Training Manager, Operations Manager, and Fleet Manager also reviewed and provided suggestions and any revisions. Recommendations were compiled beginning in April 2019. No revisions were proposed to the following sections of the SSP: (1) **Introduction: General Info**; (2) **General Information**; (3) **Sections 1-6**; (4) **Appendix B**; and (5) **Appendices E-H**.

Revisions were proposed to the following:

Appendix A: Update List of Key Personnel and Organization Chart.

Appendix C: Update Lesson Plan References to Appendix I where appropriate and Vehicle Operator/Employee Training Road Observation Report.

Appendix D: Update Safety Committee Meeting Office Safety and Inspection Reports.

Revisions to create a new Appendix proposed:

Appendix I: This appendix places Mountain Mobility Policies and Procedures Manual referenced training materials directly into the SSP for ease of use for the safety trainer, vehicle operators, and for the safety training program as a whole. This modification is nonsubstantive in that it incorporates previously directly referenced materials into an Appendix.



**SYSTEM SAFETY PROGRAM PLAN
POLICY AND PROCEDURE REVISION INDEX**

Policy/Procedure Name	SSP#	Revision #	Date	Description
Mountain Mobility SSPP Document		1	April 2015	See 2015 Annual Management Review Report for Detailed Summary
Other than general updates, the only policy-driven changes related to updates to the NCDOT Policy Guidance for Minimum Training Standards, the Title VI Policy and the new Reasonable Modification of Policies and Procedures required by 49 CFR Parts 27 and 37.	Section 2			NCDOT Policy Guidance for Minimum Training Standards dated May 23, 2014
	App. C			Lesson Plan 4 - Education on Title VI Policy and Employee Acknowledgement Forms
	App. C			Lesson Plan 10 – Training on Making Reasonable Accommodations
Policy/Procedure Name	SSP#	Revision #	Date	Description
Mountain Mobility SSPP Document		2	April 2016	See 2016 Annual Management Review Report for Detailed Summary
Other than general updates, the only policy-driven changes related to updates to incorporate NCDOT memo regarding compliance of training lesson plans with the NCDOT Training Toolkit, as well as an update to reference Safety Management System (SMS) requirements of the FAST Act regarding.	Section 1			Added reference to 3/8/2016 NCDOT Memo in description of SSPP.
	Section 2			Added copy of 3/8/2016 NCDOT Memo
	Section 3			Added description and outline of SMS requirements.
Policy/Procedure Name	SSP#	Revision #	Date	Description
Mountain Mobility SSPP Document		3	January 2018	See 2018 Annual Management Review Report for Detailed Summary
The only policy-driven changes related to updates to incorporate NCDOT directive regarding removal of the term “common wheelchair” and incorporation of the amended Substance Abuse Policy for Mountain Mobility.	App. C			Lesson Plan 15 & 16 - Replaced the term “common wheelchair” with “mobility device”
	App. E			Include Amended Substance Abuse Policy for Mountain Mobility, effective 1/9/2018
Policy/Procedure Name	SSP#	Revision #	Date	Description
Mountain Mobility SSP Document		4	May 2018	See 2018 Annual Management Review Report for Detailed Summary
Modifying the language to reflect the NCDOT PTD requirement that the Board of Commissioners adopt any annual reviews and updates of the SSP.	General Information			See System Safety Plan (SSP), Security Element & Annual Management and Review
Clarification of the wheelchair lift procedure to best explain when the vehicle operator will move between	Section 2			See Wheelchair Lift and Wheelchair Mobility Device Securement Procedures

vehicle interior/exterior during the operation of the lift.				
Clarification that alcohol testing is not included in pre-employment testing, consistent with federal regulation, local policy, and Mountain Mobility practice.	Section 4			See Drug and Alcohol Program Overview
Clarification of the NCDOT PTD requirement that Mountain Mobility vehicles purchased using state grant funds are to remain in control of vehicle operators who have the minimum required public transportation training (even in a disaster event during which Mountain Mobility serves under the EMS director). Mountain Mobility vehicle operators and EMS personnel who have the minimum required public transportation training may operate any vehicle for which NCDOT PTD holds the lien during a disaster event. EMS personnel may operate any vehicle for which the NCDOT PTD and FTA do not have any financial interest even when not having received the minimum required public transportation training.	Section 6			See Disaster Readiness. Policy/Procedure
Policy/Procedure Name	SSP#	Revision #	Date	Description
Mountain Mobility SSP Document		5	August 2019	See 2019 Annual SSP Review Report for Detailed Summary
Incorporate Mountain Mobility Policies and Procedures Manual referenced training materials directly into the SSP for ease of use for the safety trainer, vehicle operators, and for the safety training program. This modification is nonsubstantive as it incorporates previously directly referenced materials into a newly created Appendix (I).	App. I			