



## **Mountain Mobility System Safety Plan 2020 Annual Management Review Report**

### **Background and General Information**

The current Mountain Mobility System Safety Plan (SSP) was adopted by the County Board of Commissioners March 4, 2014 (an update to the June 2004 System Safety Program Plan). Community Development Division conducts an annual SSP review in consultation with Mountain Mobility Operations staff. The preceding annual review occurred in August 2019.

Mountain Mobility Operations, through an *Annual SSP Review Report*, provides recommended SSP revisions that align with current information, training, and operational procedures and practices. The Community Development Division reviews proposed revisions to determine they are both appropriate and reasonable. SSP revisions are thereafter presented to the Buncombe County Community Transportation Advisory Board (CTAB). The CTAB received the current proposed revisions at its quarterly meeting on August 27, 2020.

### **SSP Reports and Analyses**

The Community Development Division conducts ongoing monitoring and review of Mountain Mobility Operations SSP administration. Mountain Mobility Operations submits monthly the following: (1) employee; (2) vehicle operator turnover; (3) vehicle operator training; (4) drug and alcohol testing; (5) accident/incident/safety and security complaints; (6) safety data and trend analysis; (7) NC State Inspections; (8) vehicle and wheelchair lift preventative maintenance compliance; (9) current miles and preventative maintenance due mileage; and (10) mileage and breakdown reports. Mountain Mobility Operations submits quarterly the following: (1) safety meeting; (2) employee safety committee meeting; and (3) facility inspection reports. Mountain Mobility Operations submits annually the following: OSHA inspection; (2) hazard assessment; (3) workplace security assessment; (4) internal safety audit; and (5) DAMIS reports. Community Development Division staff maintain a compliance checklist and issue a monthly Certification of Review summarizing compliance and inspection reports and supporting documentation reviewed, which are retained on file.

### **Conclusion**

The SSP will be updated upon approval of revisions by the Board of Commissioners. The 2020 Annual Management Review Report, August 2020 Annual SSP Review Report, and revised SSP will be submitted to the NCDOT Integrated Mobility Division as required.





## **Mountain Mobility System Safety Plan August 2020 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 August 2019 through August 2020:

### **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 2020. 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 2020. No revisions were proposed to the following sections of the SSP: (1) **Introduction: General Info**; (2) **General Information**; (3) **Sections 2-6**; and (4) **Appendices A-H**.

Revisions were proposed to the following:

**Section 1 Vehicle Operator/Employee Selection:** Addition of “the ability to use electronic tablet device” to required vehicle operator skills.

**Create an Additional Appendix (Appendix J):** Incorporate Mountain Mobility's Contagious Pathogen Action Plan in the SSP as this guidance document was originally developed in March 2020 as a means of directing operations staff in the event of a contagious pathogen outbreak.



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

<b>Policy/Procedure Name</b>	<b>SSP#</b>	<b>Revision #</b>	<b>Date</b>	<b>Description</b>
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
<b>Policy/Procedure Name</b>	<b>SSP#</b>	<b>Revision #</b>	<b>Date</b>	<b>Description</b>
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.
<b>Policy/Procedure Name</b>	<b>SSP#</b>	<b>Revision #</b>	<b>Date</b>	<b>Description</b>
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
<b>Policy/Procedure Name</b>	<b>SSP#</b>	<b>Revision #</b>	<b>Date</b>	<b>Description</b>
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 vehicle interior/exterior during the operation of the lift.	Section 2			See Wheelchair Lift and Wheelchair Mobility Device Securement Procedures
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
<b>Policy/Procedure Name</b>	<b>SSP#</b>	<b>Revision #</b>	<b>Date</b>	<b>Description</b>
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			

Policy/Procedure Name	SSP	Revision #	Date	Description
Mountain Mobility SSP Document		6	October 2020	See 2020 Annual SSP Review Report for Detailed Summary
<p>Incorporate Mountain Mobility Contagious Pathogen Action Plan directly into the SSP for ease of use for the safety trainer, vehicle operators, and for the safety training program. This modification is nonsubstantive and incorporates existing materials into a new Appendix (Appendix J).</p>	App. J			

# APPENDIX J - CONTAGIOUS PATHOGEN ACTION PLAN

## Mountain Mobility Contagious Pathogen Action Plan

The Mountain Mobility Contagious Pathogen Action Plan (“Action Plan”) assists in managing and minimizing the impacts of a contagious pathogen outbreak in the public transportation service area. The Action Plan intends to guide next steps in extraordinary contagious pathogen situations; however, the bulk of effort required to maintain Mountain Mobility’s public transportation services relies on existing policies and standard operating procedures already in place.

The Mountain Mobility contracted service provider(s) will continue to:

1. Actively encourage sick employees to stay home.
2. Emphasize respiratory etiquette and hand hygiene by all employees.
3. Perform routine environmental cleaning by employees using disinfectant products.
4. Disseminate disinfectant gels for employee use, including employee reporting locations, revenue vehicle storage facilities, revenue vehicles, and operations facilities.

The Mountain Mobility contracted service provider(s) will expand precautions by:

1. Increasing frequency of routine environmental cleaning, including use of products targeted to kill contagious pathogens.
2. Providing education to vehicle operators and support staff on how to best protect themselves and others during a contagious pathogen event. The materials and education should strive to deliver accurate information and dispel rumor. The materials should come from a reliable source and be approved by Buncombe County Planning and Development, Public Health, and Communications.<sup>1</sup>
3. Coordinating with Buncombe County Planning and Development, Public Health, and Communications for the use of the Buncombe County website, social media, and other outlets regarding Mountain Mobility service impacts resulting from a contagious pathogen event.
4. Providing regular updates to vehicle operators and support staff regarding current conditions and changes. Regular communication between Buncombe County Planning and Development and the Mountain Mobility service provider(s) is essential and will be more frequent based on severity of the contagious pathogen event. Vehicle operators and customers can stay up to date on emerging issues at [buncombecounty.org](http://buncombecounty.org)
  - a. Sign up for Buncombe County’s Emergency Notification alerts by texting **BCALERT** to **888-777**.
  - b. Messages will be communicated to customers through RouteMatch as needed/warranted.
5. Posting on Mountain Mobility revenue vehicles, as determined necessary and appropriate, Buncombe County approved educational materials (see Item 2, above) to increase customer awareness and to dispel rumor.

The Mountain Mobility contracted service provider(s) are encouraged to:

1. Obtain a four (4) week back up supply of disinfectant gels for employee use.
2. Obtain a four (4) week back up supply of disinfectant products targeted to kill contagious pathogens (ex: EPA Registered Antimicrobial Products for use against Novel Coronavirus SARS-CoV-2, the cause of COVID-19).

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<sup>1</sup> Reliable sources of educational materials include: Buncombe County Public Health, the North Carolina Department of Health and Human Services, the US Department of Labor’s Occupational Safety and Health Administration, the Center for Disease Control and Prevention, and/or the World Health Organization.