



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

August 26, 2022

Mr. Steve Poftak
General Manager
Massachusetts Bay Transportation Authority
10 Park Plaza
Boston, MA 02116

Subject: Resubmission Special Directive 22-6 Corrective Action Plans

Dear Mr. Poftak,

Thank you and your team for resubmitting corrective action plans (CAPs) to address the following required actions from Federal Transit Administration (FTA) Special Directive 22-6 related to the Massachusetts Bay Transportation Authority's (MBTA) Operations Control Center (OCC):

- FTA-OCC-22-005: MBTA must adequately staff the OCC for current operational needs. MBTA must provide a plan to meet the operational needs of the system, consistent with MBTA's hours of service policy for rail transit motorpersons and meeting scheduled leave requirements.
- FTA-OCC-22-006: MBTA must identify and address major challenges in recruiting and training new rail transit dispatchers, the quality and performance of their training, and the certification of new candidates.

FTA Approval of MBTA's CAPs for Special Directive 22-6

The FTA has completed its review of MBTA's CAPs and resubmittals for the two (2) required actions in Special Directive 22-6 where additional action was required.

The FTA finds that these CAPs adequately address the findings and required actions identified in Special Directive 22-6, and therefore, FTA approves them for implementation.

Conclusion

We appreciate your efforts to enhance MBTA's safety performance, and we look forward to

working with you and your team as the MBTA addresses these findings and required actions. Please contact our SMI CAP Manager, Mr. Cyrell McLemore, by phone at (202) 253-7002 or by email at Elliott.Shepherd@dot.gov with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe P. DeLorenzo". The signature is fluid and cursive, with the first name "Joe" and last name "DeLorenzo" clearly distinguishable.

Joe DeLorenzo
Associate Administrator and
Chief Safety Officer
Office of Transit Safety and Oversight

Enclosure: Special Directive 22-6 Corrective Action Plan Evaluation Table

cc: Peter Butler, Regional Administrator, FTA Region 1
Jeffrey Gonneville, Deputy General Manager, MBTA
Ron Ester, Chief Safety Officer, MBTA
Dave Carney, Chief of Transit Services, MBTA
Andrea Gordon, Assistant General Manager, Rail Operations, MBTA
Elizabeth Cellucci, Director, Transportation Oversight Division, Massachusetts Department of Public Utilities



Corrective Action Plan (CAP) Evaluation Matrix Special Directive 22-6: Operations Control Center (OCC)

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
FTA-OCC-22-004	<p><u>Finding:</u> MBTA requires its OCC personnel to work in a fatigued state as a pattern and practice.</p> <p><u>Required Action:</u> MBTA must develop and enforce policies that require OCC personnel to work in a rested state. MBTA must modify its hours-of-service policy to require sufficient hours of rest, consistent with MBTA's hours of service policy for rail transit motorpersons.</p>	1. Update hours of service policy for OCC dispatchers: Document and issue SO for hours-of-service requirements for dispatchers.	6/28/22	<ul style="list-style-type: none"> <u>Note:</u> As part of verification activities, FTA will ensure documentation is available that also addresses changes in hours-of-service requirements for supervisors and managers. 	
		2. Define policy for OCC Supervisors on how to manage hours of service: Develop and issue SOP for OCC supervisors on how to manage hours-of-service limitation to ensure compliance with revised hours of service requirements, including how Supervisors are tracked if they dispatch.	9/1/22	<ul style="list-style-type: none"> <u>Note:</u> As part of verification activities, FTA will review how the MBTA is managing this policy in the interim prior to issuance of the policy/procedure. 	
		3. Create audit procedure: Create accurate management dashboards for OCC to monitor and ensure compliance with hours-of-service requirements for dispatchers.	11/1/22	No comment	
		4. Hire OCC analyst to support compliance: Hire OCC analyst dedicated to tracking and monitoring compliance with this and other OCC CAPs	1/15/23	No comment	
		5. Incorporate rule change into rulebook: Incorporate revised hours-of-service requirements into rulebook (already in update process)	4/1/23	No comment	



**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-6: Operations Control Center (OCC)**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
FTA-OCC-22-005	<p><u>Finding:</u> MBTA's OCC is significantly understaffed.</p> <p><u>Required Action:</u> MBTA must adequately staff the OCC for current operational needs. MBTA must provide a plan to meet the operational needs of the system, consistent with MBTA's hours of service policy for rail transit motorpersons and meeting scheduled leave requirements.</p>	<p>1. Define safe minimum levels of staffing and their implications: Develop safe minimum level of staffing that allows for train operations, and define and monitor implications for service and track access.</p>	6/19/22	<p>July 29, 2022 July 29, 2022 Action Required</p> <p>1. Submit to FTA an updated data analysis and rationale for establishing a safe minimum level of staffing NLT 5 August 2022. FTA will continue to follow-up with the MBTA on this analysis and may require further action on the staffing plan.</p> <p>Revised Action Item Approved</p>	<p>August 10, 2022 Response Submitted 8/5/22.</p>
		<p>2. Develop and implement updated OCC schedules: Develop revised OCC staffing plan based on availability of workforce, revised hours-of-service limitations, and short-term availability of additional dispatchers.</p>	6/19/22	<p>July 29, 2022 July 29, 2022 Action Required</p> <p>1. Provide any additions or updates to the OCC staffing plan that support the information provided to address the updated data analysis and rationale for establishing a safe minimum level of staffing.</p> <p>Revised Action Item Approved</p>	<p>August 10, 2022 Response Submitted 8/5/22.</p>
		<p>3. Increase workforce availability in short term with existing MBTA employees: Recall employees who recently held the position of dispatcher on short-term basis via agreement with Local 453.</p>	6/19/22	<p>July 29, 2022 July 29, 2022 Action Required</p> <p>1. Provide additional information regarding how the MBTA will potentially extend the agreement with Local 453 allowing recall of dispatchers beyond the 4-month period identified in the agreement.</p>	<p>August 10, 2022 Response</p> <p>1. See supporting document page 1. 2. See Medium Term Staffing Plan.</p>



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				2. Provide dispatcher staffing numbers for heavy rail and light rail under the short-term plan. Revised Action Item Approved	
		4. Develop a mechanism for utilizing former employees in the short term: Develop mechanism to utilize former employees to increase capacity either as support or to provide dispatching services.	7/22/22	July 29, 2022 Action Required 1. Submit mechanism or agreement with unions to support bringing back former employees to staff the OCC and any additional information regarding how many former employees may be interested in pursuing this opportunity. Revised Action Item Approved	August 10, 2022 Response See supporting document page 1.
		5. Medium term staffing plan: Develop data-driven staffing plan and rationale for all critical positions in the OCC, accounting for revised hours-of-service plans.	9/1/22	July 29, 2022 Action Required 1. Clarify that, as part of this action item, MBTA will submit to FTA the medium-term staffing plan. 2. Clarify if and how the medium-term plan relates to a longer term or full OCC staffing plan. This CAP does not include an action item devoted to a long-term plan for full OCC staffing. 3. Provide dispatcher and supervisor staffing numbers for heavy rail and light rail under the medium-term plan. 4. Either add the longer-term staffing plan to this CAP or clarify that the medium-term plan is the ultimate OCC staffing plan.	August 10, 2022 Response 1. The MBTA submitted the Medium Term staffing plan on 8/10/22. 2. As noted in the Medium Term Staffing Plan, “Medium Term” indicates the number of staff needed to fully staff the OCC using the existing labor model and space configuration. This may or may not change in the long-term based on what is learned from industry benchmarking and if the MBTA decides to change its OCC labor model.



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				Revised Action Item Approved	3. See Medium Term Staffing Plan. 4. See supporting document for FTA-OCC-22-006-07
		6. Workforce planning: Develop reasonable hiring plan and timeline (by department) to accomplish OCC staffing plan, including waterfall effects on other classifications as well as projected attrition.	10/15/22	July 29, 2022 Action Required 1. Clarify that, as part of this action item, MBTA will submit to FTA the hiring plan and timeline. 2. Clarify that, as part of this action, MBTA will develop a workforce planning document related to full staffing of the OCC (unless the medium-term staffing plan is the ultimate staffing plan). 3. Include milestone action items for the long-term workforce hiring plan as needed or include reference to FTA-OCC-22-006. Revised Action Item Approved	August 10, 2022 Response 1. See Medium Term Staffing Plan. 2. The MBTA will develop a full workforce hiring plan for the OCC and submit to FTA by proposed deadline of 10/15/22. 3. See supporting document for FTA-OCC-22-006-07.
		Performance Metrics	10/15/22	July 29, 2022 Action Required 1. Provide numerical value for each performance metric. Revised Action Item Approved	August 10, 2022 Response See supporting document page 5.
FTA-OCC-22-006	<u>Finding:</u> MBTA faces major challenges in recruiting and training new rail transit dispatchers. <u>Required Action:</u> MBTA must identify and address major challenges in recruiting and training new rail transit dispatchers, the quality and	1. Recruitment campaign for dispatchers: Plan and execute targeted campaign to recruit potential dispatcher candidates.	Ongoing	July 29, 2022 Action Required 1. Clarify that, as part of this action item, MBTA will submit to FTA the recruitment plan and timeline. 2. Revise to indicate that the MBTA will NOT stop or close recruiting but will continue on an ongoing basis.	August 10, 2022 Response 1. The MBTA will submit to the FTA a full recruitment plan and timeline by 10/15/22. 2. See revised Proposed Due Date column. 3. See supporting document page 8.



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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	performance of their training, and the certification of new candidates.			3. Provide additional detail and milestones regarding recruitment activities. Revised Action Item Approved	
		2.1 Increase immediate nonfinancial benefits of dispatcher role: Repost modified Heavy Rail Dispatcher job posting, which will include hiring directly into Permanent position (vs. Spare).	6/21/22	July 29, 2022 Action Required 1. Provide additional detail regarding the non-financial benefits. (Consider breaking this action item into two or more discrete items (direct hiring to permanent position and opening position to Light Rail Dispatchers). Revised Action Item Approved	August 10, 2022 Response See supporting document page 9 and new Action Item 2.2 below.
		2.2 Immediate expansion of applicant pool: Open Rapid Transit Dispatcher job to current Light Rail Dispatchers	6/21/22	Revised Action Item Approved	August 10, 2022 Response See supporting document page 9.
		3. Increase immediate financial benefits of dispatcher role: Negotiate temporary \$10,000 signing bonus for new Heavy Rail Dispatchers with the relevant union.	7/15/22	July 29, 2022 Action Required 4. Clarify that, as part of this action item, MBTA will submit to FTA documentation regarding the hiring bonus. 5. Confirm whether this signing bonus will be provided to existing dispatchers as a retention bonus, include supporting documentation. If MBTA does not intend to offer retention bonuses, confirm steps MBTA is taking to ensure retention of current Dispatchers.	August 10, 2022 Response 1. Submitted to FTA on 7/20/22. 2. 2. 3. See supporting document page 12.



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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				Revised Action Item Approved	
		4. Certification verification: Document and confirm process to ensure all new dispatchers have up-to-date certifications for their mode prior to the start of training.	8/1/22	No comments	
		5. Develop OCC training strategy: Develop strategic plan for specialized Training group to focus on OCC, including job descriptions and reporting structure.	12/1/22	July 29, 2022 Action Required 1. Clarify that, as part of this action item, MBTA will submit to FTA the OCC training strategic plan, including job descriptions and reporting structure.	August 10, 2022 Response Updated projected end date due to industry benchmarking taking place from 9/1/22 to 11/1/22. See FTA-OCC-22-6-006-09 for more information regarding justification and milestones.
		6. Develop and sustain audit procedure: Hire OCC analyst dedicated to tracking training, certifications and monitoring compliance with this and other CAPs.	1/15/23	No comments	
		7. Plan to improve long-term attractiveness of dispatcher role: Review options to restructure OCC work to increase appeal to potential candidates and identify most effective approach.	4/1/23	July 29, 2022 Action Required 1. Explain why this plan and options will take until April 2023 to complete. 2. Clarify that, as part of this action item, MBTA will submit this plan and options to FTA. 3. Include milestones to support ongoing evaluation of CAP implementation.	August 10, 2022 Response 1-3. See supporting document page 15.
				Revised Action Item Approved	



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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		8. Implement long-term attractiveness of dispatcher role: Plan and implement most effective strategies for improving appeal, accounting for resources necessary to support OCC dispatchers.	Depends on initiatives	July 29, 2022 Action Required 1. See previous item. Revised Action Item Approved	August 10, 2022 Response See response for the action item above.
		9. Hire OCC training team: Hire OCC trainers. Conduct industry benchmarking, develop training strategy, and hire OCC trainers.	7/1/23	July 29, 2022 Action Required 1. Explain rationale for waiting until March 2023 to begin hiring OCC trainers. 2. Clarify that, as part of this action item, MBTA will submit documentation regarding the hiring of OCC trainers to FTA, including their qualifications and capabilities. 3. Include milestones to support ongoing evaluation of CAP implementation. Revised Action Item Approved	August 10, 2022 Response 1. See supporting document page 16. 2. The MBTA will submit documentation regarding the hiring of OCC trainers to FTA, including their qualifications and capabilities by the proposed deadline of 7/1/23. 3. See supporting document page 16.
		10. Develop formal training program: Develop training manuals and formal training program for OCC dispatchers (all modes), including training the trainer.	7/1/23	July 29, 2022 Action Required 1. Explain timeline for developing formal training program, including manuals, and interim activities MBTA intends to implement. 2. Clarify that, as part of this action item, MBTA will submit the developed training manuals and formal training program to FTA. 3. Include milestones to support ongoing evaluation of CAP implementation.	August 10, 2022 Response 1. See supporting document page 17. 2. MBTA will submit the developed training manuals and formal training program to FTA by the proposed deadline of 7/1/23. 3. See supporting document page 17.



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				Revised Action Item Approved	
		11. Expand potential candidates for dispatcher based on other agencies: Review option and plan for recruiting dispatchers externally and/or from other MBTA classifications, based on best practices from other transit agencies.	7/1/24	July 29, 2022 Action Required 1. Explain rationale for waiting until January 2023 to begin considering outside recruitment. 2. Clarify that, as part of this action item, MBTA will submit the option and plan for recruiting dispatchers externally or from other MBTA classifications to FTA. 3. Include milestones to support ongoing evaluation of CAP implementation.	August 10, 2022 Response See supporting document page 18 for 1-3
		12. Infrastructure Assessment: Conduct a feasibility study of MBTA infrastructure to determine potential physical expansion possibilities within the current OCC 7 th floor. Assessment will include: number of consoles and layout, technical systems and capabilities to expand phone, radio, internal network and OCS system work stations.	Est. Start: 9/1/22 Est. End: 11/1/22	Revised Action Item Approved	
		13. Infrastructure changes: Implement infrastructure changes based on feasibility study and industry benchmarking .	TBD	Revised Action Item Approved	
		General		July 29, 2022 Action Required	August 10, 2022 Response



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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				1. Add action item for expanding consoles, radios, lay-out as mentioned in the budget/cost estimate. 2. Add action item to develop an audit process to ensure quality and performance of training. Revised Action Item Approved	1. See Action Items 12 and 13 above. 2. See FTA-OCC-22-6-006-10, milestone 10.05.
		Performance Metrics	7/1/24	July 29, 2022 Action Required 1. Provide numerical value for each performance metric. Revised Action Item Approved	See supporting document page 19.
FTA-OCC-22-007	<u>Finding:</u> MBTA allows dispatchers who are not current in their certifications to work in the OCC. <u>Required Action:</u> MBTA must verify that all dispatchers working within the OCC are current in their certifications prior to starting their shift.	1. Document requirements: Document and issue Special Order (SO) for certification requirements and intervals required for dispatchers (or those providing dispatching services).	7/29/22	No comments	
		2. Short-term recertification verification: Develop procedures to ensure all dispatcher (all modes) or those providing dispatching services have up-to-date certifications prior to any worked shift.	9/1/22	No comments	
		3. Include requirements in next rulebook update: Incorporate requirements for recertifications and expected intervals in current rulebook update.	4/1/23	No comments	



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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		4. Formal tracking and notification system: Develop digital centralized tracking system that allow supervisors to proactively oversee and manage process (will be done as part of FTA-LC-22-002 CAP).	7/1/23	<ul style="list-style-type: none"> <u>Note</u>: FTA will verify implementation at quarterly intervals (minimum). 	
		5. Specialized dispatcher certification: Develop Heavy & Light Rail dispatcher recertification program that is unique to job classification.	1/1/24	<ul style="list-style-type: none"> <u>Note</u>: FTA will verify implementation at quarterly intervals (minimum). 	