



U.S. Department  
of Transportation

**Federal Transit  
Administration**

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SENT VIA EMAIL**

October 7, 2022

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

Subject: Resubmittals Required for Corrective Action Plans in Response to Special Directive 22-11, Effectiveness of Safety Communications

Dear Mr. Poftak,

Thank you and your team for submitting the Massachusetts Bay Transportation Authority's (MBTA) Corrective Action Plans (CAPs) for the Federal Transit Administration's (FTA) Special Directive (SD) 22-11, Effectiveness of Safety Communication. These CAPs address FTA's three (3) findings and seven (7) required actions:

*Finding 1: MBTA has not established explicit and formal provisions to ensure safety information from safety committee results in a consistent outcome of documented, prioritized, and actionable safety information.*

- FTA-22-MBTA-CAT3-1.A: MBTA must develop and describe, in the organization's SMS documentation, instructions regarding the conduct, recording, communication and follow up of the outcome consensus decisions specific for each of the following meetings - taking into consideration the nature (strategic or tactical) of each meeting:
  - Operations and Safety Biweekly call (currently every other Friday)
  - Operations and Safety weekly meeting (currently on Wednesdays)
  - Executive Safety Committee (ESC)
  - Safety Management Review Committee (SMRC)
  - Safety Management Working Groups (SMWGs)
  - Data Analysis Group (DAG)
  - Local Safety Committee Meetings
  - Joint Labor/Management Safety Committee (required by Bipartisan Infrastructure Law)
  
- FTA-22-MBTA-CAT3-1.B: In support of the above, MBTA must develop and describe, in

the organization's Safety Management System (SMS) documentation, a formal mechanism and associated guidelines to ensure that the meetings are consistent in the identification and analyses of safety concerns and hazards; prioritization of safety risks; implementation of corrective actions; and safety risk mitigation effectiveness monitoring.

*Finding 2: MBTA has not documented explicit and formal provisions to ensure the participation of frontline employees in local safety committees as part of their job responsibilities in relation to the agency's SMS.*

- FTA-22-MBTA-CAT3-2.A: MBTA must develop explicit and formal guidelines for the expected role and contribution of frontline employees to the local safety committee meetings.
- FTA-22-MBTA-CAT3-2.B: MBTA must develop instructions for the conduct of the meetings, including explicit departmental accountabilities for meeting outcome information capture, communication and follow up.

*Finding 3: MBTA management has not effectively communicated clear direction to frontline employees on what to report and what not to report through the Safety Hotline.*

- FTA-22-MBTA-CAT3-3.A: MBTA must expedite the development of an effective ESRP as a fundamental source of safety information for hazard identification and safety performance monitoring.
- FTA-22-MBTA-CAT3-3.B: As part of the development of an effective ESRP, MBTA must provide explicit direction to frontline employees on what to report and what not to report through the ESRP (including the safety hotline).
- FTA-22-MBTA-CAT3-3.C: As part of the development of an effective ESRP, MBTA must provide refresher training to stakeholder personnel on the role of employee safety reporting within SMS and the crucial contribution managers and supervisors play in the development of an effective safety reporting context.

MBTA submitted its CAPs by the deadline established in SD 22-11 (September 20, 2022), with one CAP for each finding, including associated required actions.

### **FTA Rejection of MBTA's CAPs for Findings 1, 2 and 3; Resubmission Required**

FTA appreciates that MBTA proposes to conduct an extensive assessment and analysis to address the findings and required action specified in SD 22-11, allocating over \$4 million dollars in contractor services to review existing practices, complete gap analyses, and develop new charters, tools, and training. These CAPs lay out a thorough and thoughtful work plan for addressing MBTA's objectives.

However, the MBTA proposed timeline for full implementation extends into 2023 and does not address or include interim steps that plan for the management for the issues identified in SD 22-11. FTA finds that this additional information must be included in the CAPs to ensure mechanisms for

frontline and supervisory employees to access the MBTA's Safety Management System (SMS) and Safety Committee structure during CY 2023.

MBTA also is proposing an extensive program of contractor work to be managed and overseen by the Safety Department and the Quality, Compliance and Oversight Office (QCOO). FTA is concerned that these departments may not have the staff to adequately oversee this work. Therefore, FTA requires additional information from MBTA regarding the capacity of these departments to manage these contracts.

Finally, the CAPs propose contractor work products and activities that, once completed, must be effectively integrated into MBTA's organization and operations in order to resolve FTA's concerns. FTA requires additional details regarding how this transition will be accomplished, as described below and in the attached CAP evaluation matrix.

FTA requests that MBTA revise and resubmit certain CAPs to include the additional items as follows:

1. **Interim Plan for FTA-COM-22-001 and FTA-COM-22-002: By Friday, October 28, 2022**, FTA requests an interim plan for FTA-COM-22-001 and FTA-COM-22-002 that shows the actions that the MBTA will take in the interim (for CY 2023) to ensure that the Safety Meetings specified in the Agency Safety Plan (ASP) are conducted and that decisions and relevant safety information are recorded and followed up on, particularly for Local Safety Committees, as discussed in the SMI report.

CAPs FTA-COM-22-001 and FTA-COM-22-002 each contain an Action Item<sup>1</sup> that states "Revise the Transit Safety Plan (ASP) to reflect modifications to the safety meeting structure, procedures, and recordkeeping requirements," and shows an estimated end date of December 31, 2022, indicating this action will soon be underway. However, neither CAP specifies what modifications will be made to the "safety meeting structure, procedures and recordkeeping requirements" in the ASP for CY 2023, before the new process is developed and implemented.

FTA is concerned regarding a potential and significant reduction in opportunity for frontline employees to provide critical input on safety issues through the end of December 2023. Such a change would not address the intent of the FTA's finding, which is to ensure that MBTA employees, including frontline and supervisory personnel, have the opportunity to formally discuss safety issues and concerns as part of the MBTA's SMS and safety committee structure. This finding also ensures that MBTA's SMS has the structure in place and capability to identify, assess, and mitigate the safety risk associated with issues and concerns from frontline staff.

FTA requests this interim plan to understand how MBTA plans to modify this structure in its ASP and how these committees and related processes will be structured prior to the implementation of the new approach.

2. **Interim Plan for FTA-COM-22-003: By Friday, October 28, 2022**, FTA requests an interim

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<sup>1</sup> For FTA-COM-22-001, Action Item 15. For FTA-COM-22-002, Action Item 8.

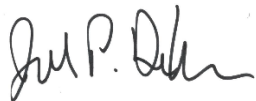
plan for FTA-COM-22-003 that explains how the MBTA will ensure that employees understand how to use the existing Employee Safety Reporting Program (Safety Hotline and other options), including what to report and what not to report, while the new approach is being developed and implemented. This interim plan must address items specified in FTA's attached evaluation table for this CAP.

3. **Resource Memorandum: By Friday, October 28, 2022**, for FTA-COM-22-001, FTA-COM-22-002, and FTA-COM-22-003, FTA requests a memorandum clarifying how MBTA's Safety Department and QCOO will oversee the work to be performed by the contractor(s) for these three CAPs, ensuring the adequacy of contractor work, coordination of multi-departmental review activities, and quality in meeting MBTA's objectives for the work. FTA remains concerned regarding the high vacancy rate in the Safety Department and FTA also recognizes that QCOO is a new office still being staffed. This information may be compiled in a single memo for the three CAPs (FTA-COM-22-001, FTA-COM-22-002, and FTA-COM-22-003), or separate memos may be issued for each CAP.
4. **Transition Plan for FTA-COM-22-001, FTA-COM-22-002 and FTA-COM-22-003: By Friday, October 28, 2022**, FTA requests a transition plan for FTA-COM-22-011, FTA-COM-22-002 and FTA-COM-22-033 to demonstrate how contractor work, once completed, will be integrated into MBTA's organization and operations to ensure long-term change. FTA prefers that separate transition plans are issued for FTA-COM-22-001, FTA-COM-22-002, and FTA-COM-22-003.

## 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 Coordinator, Erin Powell, by phone at (202) 366-2164 or by email at [Erin.Powell@dot.gov](mailto:Erin.Powell@dot.gov) with any questions.

Sincerely,



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

cc: Peter Butler, Regional Administrator, FTA Region 1  
Jeffrey Gonneville, Deputy General Manager, MBTA  
Ron Ester, Chief Safety Officer, MBTA  
Katie Choe, Chief of Quality, Compliance and Oversight  
Elizabeth Cellucci, Director, Transportation Oversight Division, Massachusetts Department of Public Utilities

**Corrective Action Plan (CAP) Evaluation Matrix  
Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
<p><b>FTA-COM-22-001</b></p>	<p><u>Finding:</u> MBTA has not established explicit and formal provisions to ensure safety information from safety committee results in a consistent outcome of documented, prioritized, and actionable safety information.</p> <p><u>Required Action:</u> <b>1.A:</b> MBTA must develop and describe, in the organization's SMS documentation, instructions regarding the conduct, recording, communication and follow up of the outcome consensus decisions specific for each of the following meetings – taking into consideration the nature (strategic or tactical) of each meeting:</p> <ul style="list-style-type: none"> <li>• Operations and Safety Biweekly call (currently every other Friday)</li> <li>• Operations and Safety weekly meeting (currently on Wednesdays)</li> <li>• Executive Safety Committee (ESC)</li> <li>• Safety Management Review Committee (SMRC)</li> <li>• Safety Management Working Groups (SMWGs)</li> </ul>	<p>1. Procure Consulting Services: Issue RFP or Task Order for consulting services to evaluate the safety meeting structure, develop instructions for the meetings, develop guidelines for the meeting content and outcomes, and how to incorporate the results into the SMS documentation.</p>	<p>11/20/22</p>	<p><b>Action Required</b></p> <p>MBTA proposed a timeline for the end of Calendar Year 2023 to fully address FTA’s finding and required actions. The proposed CAP does not provide any detail on actions MBTA will take in the interim (prior to completion of consultant’s work) to ensure that the Safety Meetings specified in the Agency Safety Plan (ASP) are conducted and that decisions and relevant safety information are recorded and followed up on, particularly for Local Safety Committees, as discussed in the SMI report.</p> <p>Since FTA found that these meetings were not occurring in compliance with the ASP, and that results were not documented and shared, FTA anticipates interim action to address this situation, which could include using contractor resources to support conduct of existing meetings or to support development of an interim plan prior to completion of the gap analysis and development and implementation of the new meeting structure by December 31, 2023.</p> <p>Action Item #15, which states “Revise the Transit Safety Plan to reflect modifications to the safety meeting structure, procedures, and recordkeeping requirements,” shows an estimated end date of December 31, 2022, indicating this action will soon be underway. Action Item 15 does not specify what modifications will be made to the “safety meeting structure, procedures and</p>	

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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	<ul style="list-style-type: none"> <li>• Data Analysis Group (DAG)</li> <li>• Local Safety Committee Meetings</li> <li>• Joint Labor/Management Safety Committee (required by Bipartisan Infrastructure Law)</li> </ul> <p><b>1.B:</b> In support of the above, MBTA must develop and describe, in the organization's SMS documentation, a formal mechanism and associated guidelines to ensure that the meetings are consistent in the identification and analyses of safety concerns and hazards; prioritization of safety risks; implementation of corrective actions; and safety risk mitigation effectiveness monitoring.</p>			<p>recordkeeping requirements” in the ASP for CY 2023, before the new process is developed and implemented.</p> <p>FTA is concerned regarding a potential and significant reduction in opportunity for frontline employees to provide critical input on safety issues through the end of December 2023. The intent of this finding is to ensure MBTA employees, including frontline and supervisory personnel, have the opportunity to discuss safety issues and concerns as a formal part of the MBTA’s SMS and safety committee structure. This finding also ensures, that, as a result of these discussions, MBTA’s SMS has the structure in place and capability to identify, assess and mitigate the safety risk associated with these issues and concerns.</p> <p>FTA also understands that the Safety Department (as of 9/23/22) has a <b>vacancy rate of 28 percent</b>, and currently may not have the resources to oversee either the conduct of the Safety Meetings or the contractor work required for this CAP. FTA remains extremely concerned regarding this situation. The Quality Compliance and Oversight Office (QCOO) also is new and still staffing up.</p> <p>To address these concerns, by Friday, October 28, FTA requires MBTA to resubmit its proposed CAP to include an interim plan that addresses how the agency will manage its Safety Committee structure and capabilities in CY 2023 (or until the new</p>	

**Corrective Action Plan (CAP) Evaluation Matrix  
Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				<p>approach is implemented) to ensure frontline employee participation as well as the identification and analysis of safety concerns discussed in these meetings. This interim plan must also explain how the interim approach will be documented in the Agency Safety Plan in effect for CY 2023.</p> <p>By Friday, October 28, MBTA also must submit a Resource Memorandum to demonstrate how the MBTA, including the Safety Department and QCOO, will manage and oversee work and contractor activities to complete this CAP.</p> <p>Finally, by Friday, October 28, MBTA must include a transition plan to demonstrate how contractor work, once completed, will be integrated into MBTA's organization and operations to ensure long-term change.</p>	
		2. Onboard Consultant: Onboard selected consultant.	2/20/23	<b>Action Item Approved</b>	
		3. Assess Existing Tools and Processes for Action Items: Compile and review all existing tools and processes used to document, track, and carry out action items from safety-related meetings.	3/20/23	<b>Action Item Approved</b>	
		4. Assess Existing Tools and Processes for Risk Assessment and Mitigation: Compile and review all	3/20/23	<b>Action Item Approved</b>	

**Corrective Action Plan (CAP) Evaluation Matrix  
Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		<p>existing tools and processes used to perform hazard identification, safety risk assessment, corrective action planning, and risk mitigation monitoring during staff and management safety meetings.</p>			
		<p>5. Tools and Processes Gap Analysis: Identify gaps in the existing tools and processes used to document, track, and carry out action items from the safety-related meetings and tools and processes used to perform hazard identification, safety risk assessment, corrective action planning, and risk mitigation monitoring during safety meetings. Analyze variations in use of existing tools and processes and reasons for variation.</p>	<p>4/20/23</p>	<p><b>Action Item Approved</b></p> <p><u>Note:</u> As part of verification for this Action Item, FTA likely will request a presentation on the results of this Tools and Process Gap Analysis.</p>	
		<p>6. Assess Existing Meeting Framework: Perform, with the assistance of a stakeholder group, a comprehensive review of the existing safety meeting structure, including meeting schedules, sequences, and attendees. Also assess the strategic and/or tactical</p>	<p>5/20/23</p>	<p><b>Action Item Approved</b></p> <p><u>Note:</u> As part of verification for this Action Item, FTA likely will review the stakeholder group to ensure it is representative of frontline, supervisory and management personnel.</p>	



**Corrective Action Plan (CAP) Evaluation Matrix  
Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		purpose of each meeting, and each meeting’s suitability for supporting safety program implementation given current agenda topics and thematic content.			
		7. Best Practices Review of Safety Meetings: Complete a best practice review of safety meeting structure and procedures.	5/20/23	<b>Action Item Approved</b>	
		8. Safety Meetings Gap Analysis and Updated Structure Proposal: Identify existing gaps in the meeting framework’s ability to support key SMS processes and demonstrated accountability of the Safety Department representative to document or report out the information discussed during the meetings while also defining requirement for employee safety concerns to be documented or acted upon by supervisors.	6/20/23	<b>Action Item Approved</b>  <u>Note:</u> As part of verification for this Action Item, FTA likely will request a presentation on the results of the Safety Meetings Gaps Analysis and Updated Structure Proposal.	
		9. Stakeholder Engagement: Convene stakeholder group from all affected areas and get concurrence on any proposed safety meeting structure changes. Modify	7/20/23	<b>Action Item Approved</b>	

**Corrective Action Plan (CAP) Evaluation Matrix  
Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		proposed structure if required based on areas of stakeholder feedback.			
		10. Establish Meeting Charters: Document and distribute to meeting stakeholders explicit meeting charters identifying the strategic and/or tactical nature of each meeting, goals and objectives for each management or staff working group, participants, and relationships with other safety meetings and processes.	8/20/23	<b>Action Item Approved</b>	
		11. Establish Unified Documentation Process: Establish uniform instructions for the conduct of meetings, including explicit departmental accountabilities for information capture and follow-up, as well as templates for meeting agenda development, meeting minutes, escalation and feedback procedures, and tracking of actionable items.	10/20/23	<b>Action Item Approved</b>	
		12. Establish Guidelines for Meetings: Establish a mechanism and associated	10/20/23	<b>Action Item Approved</b>	

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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		<p>guidelines to ensure that the meetings are consistent in the identification and analyses of safety concerns and hazards; prioritization of safety risks; implementation of corrective actions; and safety risk mitigation effectiveness monitoring. Guidelines should include escalation and feedback procedures.</p>			
		<p>13. Identify and Train Facilitators: Identify permanent facilitators to monitor and support the performance of each safety meeting, define facilitators' role, and train these individuals in implementing the meeting procedures</p>	<p>11/20/23</p>	<p><b>Action Item Approved</b></p> <p><u>Note:</u> As part of verification for this Action Item, FTA likely will require the list of permanent facilitators and observe training.</p>	
		<p>14. Implement Unified Documentation Process: Implement the system for documenting and tracking meeting action items with the support of facilitators and monitor implementation of this process to ensure all frontline and management meetings are properly documented and retained via a uniform and accessible</p>	<p>12/20/23</p>	<p><b>Action Item Approved</b></p> <p><u>Note:</u> As part of verification for this Action Item, FTA likely will observe Safety Committee meetings and review MBTA's tracking of meeting action items.</p>	

**Corrective Action Plan (CAP) Evaluation Matrix  
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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		document management system.			
		15. Revise and Distribute Transit Safety Plan: Revise the Transit Safety Plan to reflect modifications to the safety meeting structure, procedures, and recordkeeping requirements.	12/31/22	<b>Action Required</b> As part of its response for Action Item #1, by Friday, October 28, MBTA must resubmit its proposed CAP with an interim plan that addresses how the agency will manage the committee structure for its SMS until the new approach is implemented. FTA anticipates that this interim plan will be included or referenced in the revised Agency Safety Plan.	
		16. CAP Verification: Evaluate actionable items/deliverables before submission to FTA to confirm there is reasonable evidence that the findings and these required actions have been resolved, taking into account the scope and performance measures.	ongoing	<b>Action Item Approved</b>	
<b>FTA-COM-22-002</b>	<u>Finding:</u> MBTA has not documented explicit and formal provisions to ensure the participation of frontline employees in local safety committees as part of their job responsibilities in relation to the agency's SMS. <u>Required Action:</u> <b>2.A:</b> MBTA must develop explicit and formal guidelines	1. Procure Consulting Services: Develop and execute an RFP for a consultant to develop explicit and formal guidelines for the expected role and contribution of frontline employees to the local safety committee meetings, and instruction for the conduct of the meetings including explicit departmental accountabilities for meeting	11/20/22	<b>Action Required</b> MBTA proposed a timeline for the end of Calendar Year 2023 to fully address FTA's finding and required actions. As noted for CAP FTA-COM-22-001, the proposed CAP for FTA-COM-22-002 does not provide any detail on actions MBTA will take in the interim (prior to completion of consultant's work) to ensure that the participation of the frontline employees in Safety Meetings as specified in the Agency Safety Plan (ASP).	

**Corrective Action Plan (CAP) Evaluation Matrix  
Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	<p>for the expected role and contribution of frontline employees to the local safety committee meetings.</p> <p><b>2.B:</b> MBTA must develop instructions for the conduct of the meetings, including explicit departmental accountabilities for meeting outcome information capture, communication and follow up.</p>	<p>outcome capture, communication and follow-up. (In conjunction with Finding 1 CAP.)</p>		<p>As noted in FTA’s written correspondence on SD 22-11, accompanying this evaluation table, by Friday, October 28, FTA requires MBTA to resubmit its proposed CAP to include an interim plan that addresses how the agency will manage its Safety Committee structure and capabilities in CY 2023 (or until the new approach is implemented) to ensure frontline employee participation and how identified safety concerns will be documented and managed. This interim plan must also explain how the interim approach will be documented in the Agency Safety Plan in effect for CY 2023. This interim plan may be integrated into the interim plan developed for FTA-COM-22-001 or issued separately.</p> <p>By Friday, October 28, MBTA also must submit a Resource Memorandum to demonstrate how the MBTA, including the Safety Department and QCOO, will manage and oversee work and contractor activities to complete this CAP. This information may be compiled in a single memo for FTA-COM-22-001, FTA-COM-22-002, and FTA-COM-22-003, or separate memos may be issued.</p> <p>Finally, by Friday, October 28, MBTA must include a transition plan to demonstrate how contractor work, once completed, will be integrated into MBTA’s organization and operations to ensure long-term change. FTA prefers that separate transition plans are issued for FTA-COM-22-001, FTA-COM-22-002, and FTA-COM-22-003.</p>	

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Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		2. Onboard consultant: Onboard selected consultant	2/20/23	<b>Action Item Approved</b>	
		3. Establish Unified Meeting Process: Based on the assessment of existing tracking tools and the meeting framework visioning process, establish formal guidelines for the expected role and contribution of frontline employees in safety meetings and establish uniform instructions for the conduct of meetings, including explicit departmental accountabilities for information capture and follow-up.	6/20/23	<b>Action Item Approved</b>  <u>Note:</u> As part of verification for this Action Item, FTA likely will request a meeting to discuss the results of this analysis and to review the guidelines with MBTA.	
		4. Update Training Materials: Review and update existing training related to frontline worker meeting participation and expectations and assign updated training to frontline employees.	8/20/23	<b>Action Item Approved</b>  <u>Note:</u> As part of verification for this Action Item, FTA likely will observe training for frontline employees.	
		5. Implement Unified Documentation Process: Implement the new system for documenting and tracking meeting action items with the support of facilitators and monitor implementation of	7/20/23	<b>Action Item Approved</b>	

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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		this process to ensure all frontline and management meetings are properly documented and retained via a uniform and accessible document control system			
		6. Review Job Descriptions: Review job descriptions for frontline employees to ensure that safety meeting participation is explicitly identified as a component of employee duties.	10/20/23	<b>Action Item Approved</b>	
		7. Promote Local Safety Committee Participation: Work closely with Labor Relations and Unions to develop and distribute promotional materials related to the safety meeting process, including the benefits of participation and case studies highlighting impacts on the safety program.	10/20/23	<b>Action Item Approved</b>  <u>Note:</u> As part of verification for this Action Item, FTA likely will observe meetings to discuss promotion of participation in Local Safety Committees.	
		8. Revise Transit Safety Plan: MBTA will revise its Transit Safety Plan to reflect modifications to the safety meeting structure and recordkeeping requirements.	12/31/22	<b>Action Required</b>  As part of its response for Action Item #1, by Friday, October 28, MBTA must resubmit its proposed CAP with an interim plan for how the agency will manage its safety committee structure and ensure employee participation for CY 2023. FTA anticipates that this interim	

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Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		<p>9. CAP Verification: MBTA departments will evaluate actionable items/deliverables before submission to FTA to confirm there is reasonable evidence that the findings and this required action have been resolved, taking into account the scope and performance measures.</p>	ongoing	<p>plan will be included or referenced in the revised Agency Safety Plan.</p> <p><b>Action Item Approved</b></p>	
<p><b>FTA-COM-22-003</b></p>	<p><u>Finding:</u> MBTA management has not effectively communicated clear direction to frontline employees on what to report and what not to report through the Safety Hotline.</p> <p><u>Required Action:</u></p> <p><b>3.A:</b> MBTA must expedite the development of an effective ESRP as a fundamental source of safety information for hazard identification and safety performance monitoring.</p> <p><b>3.B:</b> As part of the development of an effective ESRP, MBTA must provide explicit direction to frontline employees on what to report</p>	<p>1. Procure Consulting Services: Issue an RFP or initiate a task order to evaluate the procedures and use of the existing ESRP and Maintenance request systems and evaluate and revise training.</p>	11/15/22	<p><b>Action Required</b></p> <p>MBTA proposed a timeline of almost one year to fully address FTA’s finding and required actions. The proposed CAP does not provide any detail on actions MBTA will take in the interim (prior to completion of consultant’s work) to ensure effective employee safety reporting to address FTA’s finding. Notably, Required Actions 3B and 3C can be acted upon immediately by MBTA Management, perhaps in coordination with MBTA’s Labor Union Management, based on the existing ESRP specified in the Agency Safety Plan.</p> <p>As noted in FTA’s written correspondence on SD 22-11, accompanying this evaluation table, by Friday, October 28, FTA requires MBTA to resubmit its proposed CAP to include an interim plan that addresses how the agency will respond to Required Actions 3B and 3C to ensure employees receive</p>	



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	<p>and what not to report through the ESRP (including the safety hotline).</p> <p><b>3.C:</b> As part of the development of an effective ESRP, MBTA must provide refresher training to stakeholder personnel on the role of employee safety reporting within SMS and the crucial contribution managers and supervisors play in the development of an effective safety reporting context.</p>			<p>explicit direction on what to report and not to report using the existing ESRP (Safety Hotline). This interim plan must also explain how the interim approach will be documented in the Agency Safety Plan in effect for CY 2023.</p> <p>By Friday, October 28, MBTA also must submit a Resource Memorandum to demonstrate how the MBTA, including the Safety Department and QCOO, will manage and oversee work and contractor activities to complete this CAP. This information may be compiled in a single memo for FTA-COM-22-001, FTA-COM-22-002, and FTA-COM-22-003, or separate memos may be issued.</p> <p>Finally, by Friday, October 28, MBTA must include a transition plan to demonstrate how contractor work, once completed, will be integrated into MBTA's organization and operations to ensure long-term change. As part of the transition plan, please specify how MBTA Management will coordinate with Labor Union Management and Members in the update of ESRP related documents. FTA prefers that separate transition plans are issued for FTA-COM-22-001, FTA-COM-22-002, and FTA-COM-22-003.</p>	
		2. Onboard Consultant: Onboard selected consultant	2/15/23	<b>Action Item Approved</b>	
		3. Review and Update ESRP Guidance Documents: Perform a comprehensive	3/22/23	<b>Action Required</b> See transition plan required above for Action Item 1: Please specify how MBTA	

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Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		<p>review of existing program documentation and identify processes, workflows, and tools which will be established to guarantee the success of the ESRP.</p>		<p>Management will coordinate with Labor Union Management and Members in the update of ESRP related documents.</p>	
		<p>4. Monitor ESRP / SRM Integration: Ensure that ESRP inputs are fully integrated into the Authority's proactive Safety Risk Management process, including through clear provisions for hazard analysis and risk assessment.</p>	<p>4/23/23</p>	<p><b>Action Item Approved</b> <u>Note:</u> As part of verification for this CAP item, FTA will review ESRP documentation related to ESRP use, management, inputs, and outputs, as well as elevation of safety concerns as specified in MBTA documents.</p>	
		<p>5. Support ESRP / SRM Integration: Establish the management review structure required to support adequate integration of the ESRP and SRM process, including promotion of the ESRP tools to employees, escalation of hazards, risk assessment, and consideration of ESRP inputs against larger background patterns and trends of hazards and risks sourced from other areas including workshops, JHAs, and oversight activities.</p>	<p>6/1/23</p>	<p><b>Action Item Approved</b></p>	
		<p>6. Review and Update ESRP Trainings: Update training</p>	<p>7/2/23</p>	<p><b>Action Item Approved</b></p>	

**Corrective Action Plan (CAP) Evaluation Matrix  
Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		modules related to employee safety reporting.			
		7. Assign Updated ESRP Trainings: Issue and assign / reassign trainings related to the ESRP to key frontline employee groups.	8/6/23	<b>Action Item Approved</b>	
		8. Assess and Document Service Request Process: Evaluate the Authority's existing process for management of housekeeping and maintenance requests; document workflows, resources, and department integration necessary to manage these requests; and address gaps and root causes for maintenance requests being submitted to the ESRP.	10/31/23	<b>Action Item Approved</b>	
		9. Promote ESRP Reporting Criteria: Develop and deliver safety promotion materials related to the ESRP, including proper reporting of maintenance and housekeeping issues via other channels.	12/15/23	<b>Action Item Approved</b>	
		10. Promote ESRP Successes and its Role in the Hazardous Management Process: Develop and deliver safety	12/15/23	<b>Action Item Approved</b>	

**Corrective Action Plan (CAP) Evaluation Matrix  
Special Directive 22-11: Safety Communication**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		<p>promotion materials related to the ESRP, including success stories related to employee hazard identification and the important role of the ESRP in MBTA’s proactive hazard management process.</p>			
		<p>11. CAP Verification: Evaluate actionable items/deliverables before submission to FTA to confirm there is reasonable evidence that the findings and this required action have been resolved, taking into account the scope and performance measures.</p>	<p>Ongoing</p>	<p><b>Action Item Approved</b></p>	