



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

October 21, 2022

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

Subject: Approval and Resubmittals Required for Corrective Action Plans in Response to Special Directive 22-12, Operating Conditions and Policies, Procedures, and Training

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) 22-12, Operating Conditions and Policies, Procedures, and Training. The MBTA submitted these CAPs on time as required in SD 22-12, addressing [FTA's seven \(7\) findings and 19 required actions](#).

Approval of CAPs for Findings 4, 5, 6 and 7

FTA approves MBTA's CAPs for Findings 4, 5, 6, and 7. Collectively, these CAPs focus on the evaluation and enhancement of operations and maintenance training; the development of tools and checklists to support maintenance; the strengthening of the MBTA's mentoring program for rail transit employees; and the elimination of radio dead spots. Based on FTA's analysis of MBTA's proposed CAPs for these findings, FTA finds:

- MBTA's approach to addressing Finding 4 in SD 22-12, which requires MBTA to conduct a training needs assessment for rail transit operations and maintenance departments, to include emergency response training, and to implement the results, while considering the use of technology and information management tools, adequately addresses FTA's required action.
- MBTA's approach to addressing Finding 5 in SD 22-12, which requires MBTA to review its existing maintenance rules and procedures; identify opportunities for tools and checklists to support employees in carrying out maintenance rules and procedures, including frontline employee participation; and develop, distribute, maintain, and update these materials,

adequately addresses FTA's required action.

- MBTA's approach to addressing Finding 6 in SD 22-12, which requires MBTA to evaluate and enhance its existing rail transit employee mentoring program and to consider opportunities to support the professional development of rail transit operations personnel, adequately addresses FTA's required action.
- MBTA's approach to addressing Finding 7 in SD 22-12, which requires MBTA to confirm radio dead spots with frontline motorpersons and maintenance workers and improve the performance of its radio system in these dead spots, adequately addresses FTA's required action.

FTA approves MBTA's CAPs for Findings 4, 5, 6, and 7 for implementation.

Resubmission Required of CAPs or Findings 1, 2 and 3

FTA requires resubmittal of MBTA's CAPs for Findings 1, 2 and 3. Collectively, these three findings require MBTA to ensure each MBTA department identifies, reviews and addresses non-compliance with key rules and procedures critical to the safety of activities performed by the department, and also reports results to the Safety Department and Executive Leadership; to develop and implement an approach to monitoring operations and maintenance activities to enable the analysis and understanding of situations of non-compliance; and to develop and implement an independent quality assurance and quality control function.

Based on FTA's analysis of MBTA's proposed CAPs for these findings, FTA finds extended milestones for implementation of action items that push CAP completion for these findings into the end of Calendar Year 2025 and the first quarter of Calendar Year 2026. **Some of the action items identified in the CAPs, and some of the timeframes, may create substantial risk of non-compliance or unsuccessful project delivery without the opportunity for FTA to review the MBTA's progress in shorter intervals. FTA has requested additional milestones and actions in the attached evaluation matrix.**

FTA also finds the proposed CAPs lack milestones that address how critical safety issues identified in FTA's SMI report will be managed in the interim. FTA cannot approve these CAPs until **MBTA provides additional detail regarding actions underway immediately to address safety risk identified in the FTA's SMI report.**

Further, because MBTA proposes the extensive use of contractors, FTA finds that **additional milestones and action items are needed to ensure integration of consultant work into MBTA's operations and maintenance.** Finally, FTA is concerned about the **sufficiency of resources to oversee and manage both contractor and MBTA agency-wide work for these CAPs.**

FTA also needs to understand how MBTA's personnel, including QCOO, the Safety Department, Steering Committees, Working Groups, Departmental and Executive Leadership and contractors, will **engage with FTA and the SMI team in Bi-Weekly Meetings and during verification activities.** The CAPs do not clearly indicate how this engagement will occur.

To address these concerns, FTA requires MBTA to resubmit its proposed CAPs for Findings 1, 2

and 3 to include additional Action Items that address how the agency will mitigate key safety concerns identified in FTA's SMI report in the interim while contractor or agency work proceeds. FTA has provided specific comments in the attached evaluation table to support development of these additional Action Items.

FTA requires MBTA to include additional Action Items as part of the resubmittal of CAPs for Findings 1, 2, and 3 that demonstrate how contractor work, once completed, will be integrated into MBTA's organization and operations to ensure long-term change.

MBTA also must submit a Resource Memorandum to demonstrate how the relevant MBTA departments, including the Safety Department and the Quality, Compliance and Oversight Office (QCOO), will resource, manage, and oversee work and contractor activities to complete CAPs for Findings 1, 2, and 3 – within the context of current accountabilities and responsibilities.

Finally, FTA requires MBTA to submit an Engagement Plan to clarify how MBTA personnel, committees and working groups, and contractors will engage with FTA through the performance of these CAPs.

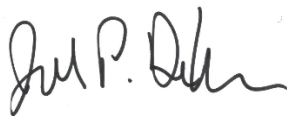
FTA requires that MBTA resubmit the proposed CAPs and provide the other required information by **Monday, November 14, 2022**.

Also, please be advised that for FTA's December on-site meetings (week of December 5, 2022), FTA will ask MBTA to provide a presentation regarding the requirements to be included in the RFPs identified in the CAPs for Findings 1, 2, and 3.

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 (771) 200-8016 or by email at 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
Erik Stoothoff, Acting Chief Operating Officer, MBTA

Ron Ester, Chief Safety Officer, MBTA

Katie Choe, Chief of Quality, Compliance and Oversight, MBTA

Elizabeth Cellucci, Director, Transportation Oversight Division, Massachusetts Department
of Public Utilities

Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
<p>FTA-22-MBTA-CAT4-1</p>	<p><u>Finding:</u> Documented operating and maintenance rules and procedures are not implemented as required.</p> <p><u>Required Actions:</u></p> <p><i>FTA-22-MBTA-CAT4-1.A</i> Each operating and maintenance department must establish a group to review department-wide information on levels of non-compliance with key rules and procedures critical to the safety of activities performed by the department.</p> <p><i>FTA-22-MBTA-CAT4-1.B</i> Each department must establish and act on a prioritized list of most frequently violated rules and procedures with the most significant potential safety consequences.</p> <p><i>FTA-22-MBTA-CAT4-1.C</i> Each department must develop and implement approaches, which could include audits, use of checklists and guides, campaigns, and training, to improve compliance.</p> <p><i>FTA-22-MBTA-CAT4-1.D</i></p>	<p>1. Establish a Steering Committee of internal stakeholders to review and guide implementation of the corrective action plan.</p>	<p>10/31/22</p>	<p>Action Required</p> <p>For this CAP, MBTA has proposed a timeline for the end of Calendar Year 2025 to address FTA’s finding and required actions and also will be using contractors and a Steering Committee to complete a significant portion of the work.</p> <p>FTA is concerned about this two-year timeframe and requires MBTA to revise this CAP to include interim Action Items the MBTA will take to address the serious safety concerns identified in the SMI report in the interim while contractor work and other activities are being performed over the next two years.</p> <p>FTA also needs to understand how MBTA’s personnel, including QCOO, the Safety Department, Steering Committees, Working Groups, Departmental and Executive Leadership and contractors, will engage with FTA and the SMI team in Bi-Weekly Meetings and during verification activities. The CAPs do not clearly indicate how this engagement will occur.</p> <p>Furthermore, as discussed in response to CAPs proposed for SD 22-11 and SD 22-9, FTA also</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	<p>Each department must report to the Safety Department monthly on its compliance with identified key rules and procedures critical to the safety of activities performed by the department.</p> <p><i>FTA-22-MBTA-CAT4-1.E</i></p> <p>The Safety Department must review and audit these reports and compile a monthly compliance report for MBTA’s executive leadership team.</p> <p><i>FTA-22-MBTA-CAT4-1.F</i></p> <p>Each department must continue to review safety data to assess effectiveness of actions and to improve compliance with safety rules and procedures.</p>			<p>requires inclusion of additional Action Items to clarify how proposed actions completed by the contractor or MBTA working groups will be integrated and absorbed into existing MBTA internal roles and responsibilities.</p> <p>Finally, in order to understand the MBTA’s approach to resourcing this CAP, FTA requires additional information on the MBTA personnel resources available to manage, monitor and oversee implementation and integration of this CAP into MBTA’s operations and maintenance. FTA is particularly interested in the resources available in the Quality, Compliance and Oversight Office (QCOO), the Safety Department, the Steering Committee, and the Rules Compliance Working Groups (RCWGs).</p> <p>To address these items FTA requires MBTA to resubmit its proposed CAP for FTA-22-MBTA-CAT4-1 to include additional Action Items that address how the agency will mitigate the safety concerns identified in FTA’s SMI report in the interim until such contracted projects are complete (or until the new approach is implemented). FTA</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				<p>has provided specific comments in the Action Items in this evaluation table for FTA-22-MBTA-CAT4-1 to support development of these additional Action Items.</p> <p>MBTA must also submit a Resource Memorandum to demonstrate how the relevant MBTA departments, including the Safety Department and QCOO, will resource, manage, and oversee work and contractor activities to complete this CAP – within the context of current accountabilities and responsibilities.</p> <p>MBTA must also update its CAP for FTA-22-MBTA-CAT4-1 to include additional Action Items that will demonstrate how contractor work, once completed, will be integrated into MBTA’s organization and operations to ensure long-term change.</p> <p>Finally, MBTA must submit an Engagement Plan to clarify how MBTA personnel, committees and working groups, and contractors will engage with FTA through the performance of these CAPs.</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		2. Conduct a strategic planning session for SD 22-12 Finding 1 CAP implementation with the RCWG identified in Actionable Item #1.	11/30/22	Action Item Approved <u>Note:</u> FTA will review agendas and meeting notes to assess implementation of these sessions.	
		3. Issue an RFP for consulting services to evaluate the MBTA's current rules, procedures and policies; identifying best practices/ industry standards for reducing violations/improving compliance; recommending revisions and updating MBTA manuals and documents while working concurrently with the working groups for each department	12/20/22	Action Item Approved <u>Note:</u> FTA will ask MBTA to provide a presentation regarding the requirements to be included in the RFP prior to its release.	
		4. E&M will establish a Rules Compliance Working Group (RCWG) comprised of employees who perform the work (Superintendents, Supervisors, Instructors) at all levels, MBTA construction logistics and MBTA Safety, for each department. Operations will establish a Rules Compliance Working Group (RCWG) comprised of employees who perform the work (Operator, Supervisors, Instructors) at all levels and	12/31/22	Action Item Approved <u>Note:</u> FTA will review agendas and meeting notes to assess implementation of these sessions.	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		MBTA Safety, for each operating line/department. Required action 1A			
		5. Develop process to begin reporting monthly rules violations to Safety.	Ongoing/continuous	Action Item Approved <u>Note:</u> FTA will review reports to Safety as part of its verification activities for this Action Item.	
		6. Onboard selected consultant.	2/28/23	Action Item Approved <u>Note:</u> FTA will review the executed contract for the selected consultant to verify the scope of work and qualifications of the selected contractor to assure their ability to provide these activities.	
		7. Each RCWG will compile a list of key rules and procedures critical to the safety of activities performed by their department. Consultant will support and facilitate; aid in identifying industry consensus on safety critical tasks for Operations and Maintenance. Coordinate this activity with the critical activities list for SD 22-9 and CAPs 2 and 5 for 22-12.	5/31/23	Action Required Due to the proposed seven (7) month period between Action Item #7 and Action Item #8, MBTA must revise this action item to identify the interim activities that will be performed to ensure that this CAP stays on track and successfully identifies key rules and procedures for each MBTA department. While industry consensus may be helpful, MBTA must ensure focus on MBTA operations and maintenance and	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				<p>ensure input from frontline, supervisory and technical personnel, as well as leadership.</p> <p>Finally, must explain why it will take 7 months to identify key operating and maintenance rules and procedures critical to the safety of activities performed by the MBTA department.</p>	
		<p>8. Review all recorded data (violations, safety incidents) from 2019-2022 to identify and categorize the most frequently violated rules/procedures. Consultant to analyze data to create list of most violated rules, procedures and policies Required action 1B</p>	<p>12/31/23</p>	<p>Action Required</p> <p>MBTA must modify this Action Item to ensure that a review of the recorded data is not limited to just violations and safety incidents but takes advantage of dashboards and management reporting tools in each department that may have safety impact (i.e., speed restrictions, cables in water, hours of service/overtime, to ensure instances where required maintenance activities may not be performed or performed completely).</p>	
		<p>9. Review Safety Rules Compliance Program (SRCP). Assess current tools to document compliance. Determine how to improve compliance, documentation</p>	<p>5/31/24</p>	<p>Action Required</p> <p>MBTA must update this Action Item to indicate if this activity is being performed by the Steering Committee, the RCWG or the consultant, and explain why this</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		and implement industry best practices.		activity is occurring so long after the issuance of the Special Directive. Also, MBTA must add additional Action Items to document what the MBTA will be doing in the interim for its SRCP.	
		10. Develop criteria/metric for acceptable level of compliance. Develop audits, checklists and guides, campaigns, and training to document compliance. Refer to SD 22-4 CAP 2, SD 22-5 CAP 3 for updates to SRCP for ROW Safety and Train movements.	12/31/24	Action Required MBTA must revise this Action Item and create additional milestones that are specific to the items called out in this Action Item. MBTA must also indicate how their delivery will be staggered between 5/31/24 and 12/31/24. <u>Note:</u> As part of verification for this Action Item, FTA will request to review the criteria established by MBTA.	
		11. Develop a dashboard on compliance with key rules, procedures & policies. Required action 1D Required action 1E	Ongoing/continuous	Action Item Approved	
		12. Safety will develop a process to report SR Compliance to Executive Leadership.	Ongoing/continuous	Action Required	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				MBTA must provide a more detailed schedule for this Action Item that includes milestone schedule and implementation schedule.	
		13. MBTA Safety, Operations training & VM Training and E&M Training to work with consultant who will develop SRCP training material and will ensure that all affected personnel are informed of the SRCP. Coordinate this effort with SD 22-12 CAP 4 implementation.	2/28/25	Action Required Given its six-month duration, MBTA must revise this Action Item to provide more detailed milestones and timelines for completion of this Action Item.	
		14. The MBTA will provide training for all personnel in appropriate MBTA departments in phases. Refer to SD 22-12 CAP 4 for details on updates to MBTA training for Operations and Maintenance.	8/31/25	Action Item Approved <u>Note:</u> FTA will observe this training.	
		15. Safety will distribute the materials developed to improve compliance (SRCP) in phases as training is accomplished. This distribution will include an acknowledgement of receipt. Required action 1C	9/31/25	Action Required MBTA must modify the Action Item to include the interim actions MBTA will take and the actions underway to improve compliance before the due date for this Action Item.	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		<p>16. Upon establishment of the revised SRCP, MBTA Safety will review monthly the violations and compliance dashboard and will establish a consistent method for auditing regularly to ensure program is effective.</p> <p>Required action 1F</p>	Ongoing/continuous	Action Item Approved	
		<p>17. 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>	12/31/25	Action Item Approved	
<p>FTA-22-12-MBTA-CAT4-2</p>	<p><u>Finding:</u> MBTA does not monitor operations, including the conditions of the operating environment, to identify the reasons for deviations between formal, established standards, rules and procedures, and actual operations and maintenance practices.</p> <p><u>Required Action:</u></p>	<p>1. Establish a Steering Committee of internal stakeholders to review and guide implementation of the corrective action plan.</p>	10/31/22	<p>Action Required</p> <p>For this CAP, MBTA has proposed the extensive use of contractors and a timeline for the first quarter of Calendar Year 2026 to fully address FTA’s finding and required actions.</p> <p>FTA is concerned regarding this approach and timeframe, and requires MBTA to revise this CAP to include additional action items that</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	<p>MBTA must develop, document, and communicate a mechanism to monitor operations, and provide training to stakeholder safety and operating personnel on this mechanism, to enable the analysis and understanding of situations of non-compliance.</p>			<p>identify the interim actions the MBTA will take to address the serious safety concerns identified in the SMI report while contractor work and other activities are being performed to address FTA-22-MBTA-CAT4-2. Furthermore, as discussed in response to CAPs proposed for SD 22-11 and SD 22-9, FTA also requires inclusion of additional Action Items to clarify how proposed actions completed by the contractor or MBTA working groups will be integrated and absorbed into existing MBTA internal roles and responsibilities.</p> <p>FTA requires MBTA to resubmit its proposed CAP to include additional Action Items that address how the agency will mitigate FTA’s identified concerns in the interim until such contracted projects are complete (or until the new approach is implemented). FTA has provided specific comments in the Action Items in this evaluation table to support development of these additional Action Items.</p> <p>MBTA must also submit a Resource Memorandum to demonstrate how the relevant MBTA departments, including the Safety Department</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				<p>and QCOO, will resource, manage, and oversee work and contractor activities to complete this CAP – within the context of current accountabilities and responsibilities.</p> <p>MBTA must include additional Action Items to demonstrate how contractor work, once completed, will be integrated into MBTA’s organization and operations to ensure long-term change.</p> <p>FTA will also requires an Engagement Plan to clarify how MBTA personnel, committees and working groups, and contractors will engage with FTA through the performance of these CAPs.</p>	
		<p>2. Conduct a strategic planning session for SD 22-12 Finding 2 CAP implementation with the WG identified in Actionable Item #1.</p>	<p>11/30/22</p>	<p>Action Item Approved</p> <p><u>Note:</u> FTA will review agendas and meeting notes to assess implementation of these sessions.</p>	
		<p>3. Develop and issue RFP to include assistance gathering data to evaluate deviations from the rules to inform MBTA decisions; assist in development of compliance</p>	<p>12/20/22</p>	<p>Action Item Approved</p> <p><u>Note:</u> FTA will ask MBTA to provide a presentation regarding the</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		process and tracking/reporting non-conformance; analyze results.		requirements to be included in the RFP prior to its release.	
		4. Onboard selected consultant	5/31/23	<p>Action Item Approved</p> <p><u>Note:</u> FTA will review the executed contract for the selected consultant to verify the scope of work and qualifications of the selected contractor to assure their ability to provide these activities.</p>	
		<p>5. Establish a Rules Review Working Group (RRWG) comprised of employees at all levels plus System-Wide Accessibility and MBTA Safety, including OSH, for each operating line/department.</p> <p>Note: Interdependent with work in SD 22-12 CAP 1 around SRCP</p>	5/31/24	<p>Action Required</p> <p>MBTA must explain why this milestone is projected to be 12 months after the consultant is on-boarded.</p> <p>MBTA must revise this Action Item to provide additional milestones and interim actions regarding the steps the MBTA will take to stand up these committees and the number of committees. For example, will they be staggered in creation during the 12 months?</p>	
		6. RRWGs, in concert with QCOO, consultant and systemwide departmental representatives, will review SCRCP data on deviations from formal/official procedures.	9/30/24	<p>Action Required</p> <p>MBTA must revise this action item to ensure that the review is not limited to SCRCP data but includes other relevant operations and</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				maintenance data, as well as observations of normal operations and maintenance conducted and documented by Supervisors and Superintendents.	
		7. RRWGs in concert with QCOO, consultant and systemwide departmental representatives, will analyze data to determine the root cause for deviation from formal/official rules and standards. Determine what/if needs to change – the rules, the actual practice, or other factors. Identify obstacles/dynamics that may be contributing to noncompliance.	12/31/24	Action Required Given that this milestone is two years away, MBTA must revise this action item to provide interim milestones indicating how the MBTA RRWGs will conduct these assessments, i.e., will the RRWP pilot an approach, or will implementation be staggered across RRWGs?	
		8. Develop reporting mechanism/dashboard using compliance data. Use dashboard to track compliance and identify trends in noncompliance.	Ongoing/ in perpetuity	Action Item Approved	
		9. Operations and RRWG will use root cause analysis to establish cadence and thresholds of noncompliance to trigger review of rules.	Ongoing/in perpetuity	Action Required MBTA must revise this action item to provide additional milestones. MBTA must explain the milestones and processes to ensure the RRWGs are implemented and how and when they will use “root cause analysis” to review rules.	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		10. Establish a process for rule review and change when trends/issue of noncompliance are identified. Capture revisions using DMS established in CAP 3.	3/31/25	Action Required MBTA must revise this action item to include interim milestones regarding the development of this process.	
		11. Identify key Safety and Operations stakeholders and train in process for rule review.	10/31/25	Action Item Approved	
		12. Using the improved SRCP (from CAP 1), MBTA Safety and Operations will review the violations and compliance dashboard monthly and regularly audit the SRCP to monitor its effectiveness.	3/1/26	Action Required MBTA must revise this action item to ensure that MBTA Safety and Operations review will not be limited to violations / compliance dashboard and SRCP data but will include other relevant operations and maintenance data, as well as observations of normal operations and maintenance conducted and documented by Supervisors and Superintendents.	
		13. 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, considering the scope and performance measures.	3/1/26	Action Item Approved	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
FTA-22-12-MBTA-CAT4-3	<u>Finding:</u> MBTA's QA/QC program is not sufficiently independent from the activities it oversees. <u>Required Action:</u> <i>FTA-22-MBTA-CAT4-3.A</i> MBTA must develop and administer a QA/QC program to independently oversee of ongoing QA/QC activities. <i>FTA-22-MBTA-CAT4-3.B</i> MBTA must ensure that the QA/QC functions are independent of the functions of the Safety department and report directly to the GM.	1. The MBTA will establish a Quality Management Working Group (QMWG) comprised of stakeholder groups involved in the oversight, support, and management of processes in need of auditing.	12/1/22	Action Required MBTA must re-submit this CAP with additional Action Items that demonstrate how MBTA is addressing the safety concerns identified in FTA-22-12-MBTA-CAT4-3 while work is being completed by the contractor and MBTA. In addition, MBTA must include an Engagement Plan to clarify how MBTA personnel, committees and working groups, and contractors will engage with FTA through the performance of these CAPs.	
	<i>FTA-22-MBTA-CAT4-3.C</i> MBTA must develop a formal QA/QC procedure that details the oversight of and accountability and roles and responsibilities for QA/QC programs provided by railcar manufacturers and MBTA consultants related to quality control of its railcars and subcomponents.	2. Conduct a strategic planning session for SD 22-12 Finding 3 CAP implementation with the QMWG identified in Actionable Item #1.	1/31/23	Action Item Approved <u>Note:</u> FTA will review agendas and meeting notes to assess implementation of these sessions.	
	<i>FTA-22-MBTA-CAT4-3.D</i> MBTA must ensure that the MBTA QA/QC independent	3. Identify consulting resources which will support <ul style="list-style-type: none"> • Current Status Assessment • Developing structure and governance for QC system • Best Practices Review for transit and adjacent 	2/28/23	Action Item Approved <u>Note:</u> FTA will ask MBTA to provide a presentation regarding the requirements to be included in the RFP prior to its release.	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	group is staffed with a sufficient SMEs in necessary disciplines to ensure a complete and thorough understanding of the responsibilities under the purview of railcar maintenance and engineering.	industries outside of transit <ul style="list-style-type: none"> • SOP and document development • Quality Management Dashboard • Document Management System design and specifications 			
		4. Onboard selected consultant	5/31/23	Action Item Approved	
		5. Perform benchmarking and internal assessment to determine the current state of QM audit program.	9/1/23	Action Required MBTA must revise this action item to include additional milestones and Action Items that explain how MBTA will address the concerns identified in FTA's SMI report between now and 9/1/23.	
		6. Establish the scope of quality audit activities by each department to be addressed by the CAP; Develop the Quality Management Plan which will establish key activities & processes, oversight & stakeholders, policies, and department vision. Determine safety critical processes to be audited.	12/31/23	Action Required MBTA must revise this action item to provide additional milestones and Action Items that clarify how this will be managed. Will the scoping of quality audit activities be staggered or will they be established in a single document or approach?	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		Required action 3.A Building a Quality Management Program		Also, MBTA must include any activities related to organization model and staffing plan.	
		<p>7.</p> <p>7a With QM department scope established, identify which short-term goals can be supported by existing staff. This would include which key processes and which type of audits (documentation, process observation, etc.).</p> <p>If gaps exist to cover short-term needs:</p> <ul style="list-style-type: none"> • Adjust staffing plan to include additional resources • Identify 3rd party resources to support specific audits 	2/1/24	<p>Action Required</p> <p>MBTA must revise this action item to include interim milestones regarding the identification of these goals and assessment of gaps for staffing.</p>	
		<p>7b Identify key roles needed to support creation and support of Document Management System (DMS); developing standards to govern naming, review cycle, review level triggers, document hierarchy, interdependency and criticality for all rules,</p>	3/1/24	<p>Action Required</p> <p>MBTA must revise this action item to include interim milestones regarding the identification of roles and the creation of the DMS.</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		SOPs & manuals that govern Operations and Maintenance.			
		8. Stakeholder departments to develop and sign off on their respective SOPs to enable documentation audits. Required action 3.C Processes/Procedures	8/1/24	Action Required MBTA must revise this action item to include interim milestones regarding this activity. In addition, MBTA must revise this action item to address whether SOPs be developed through pilot process or staggered or all together.	
		9. 9a Quality Management team will execute the auditing program of all safety critical maintenance activities and additional processes agreed upon by Capital Programs and Transportation.	2/28/25	Action Required MBTA must revise this action item to clarify accountability. FTA is concerned that MBTA is allowing Capital Programs and Transportation to dictate auditable safety critical elements. The Quality Management team must be independent and should consult with all stakeholders. The Quality Management team must maintain accountability for decisions related to selection, timing, and scope of auditing activities.	
		9b Create a central repository for all documents that govern operating conditions. Procure a DMS that will be a universally	2/28/25	Action Item Approved	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		accessible repository for all governing documents.			
		10. Develop Executive QM Dashboard (Monthly Report) and establish monthly update meeting with GM's office. Required action 3.B Independent Oversight	2/28/25	Action Item Approved	
		11. Identify resource needs for a fully staffed Quality Management Program and develop a five-year staffing and hiring plan. Required action 3.D Staffing and Expertise	2/28/25	Action Required 3.D requires that MBTA QA/QC is independent and staffed with SMEs in the necessary disciplines. MBTA must revise this action item to clarify how MBTA will ensure the independence of the QA/QC group.	
		12. 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, considering the scope and performance measures.	3/1/25	Action Item Approved	
FTA-22-12-MBTA-CAT4-4	<u>Finding:</u> Technical training for operations and maintenance departments is under-resourced and decentralized, without sufficient	1. MBTA will develop a TWG to assess training needs. This working group will include members from Transportation, Maintenance, Safety, Security & Emergency	11/1/22	Action Item Approved	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	<p>resources and direction, and relies significantly on on-the-job training (OJT) which is informal and lacks oversight. Emergency response training is poorly integrated into overall training program.</p> <p><u>Required Action:</u></p> <p><i>FTA-22-MBTA-CAT4-4.A</i> MBTA must conduct a training needs assessment for rail transit operations and maintenance departments, to include emergency response training. This assessment should identify training that needs to be updated, developed, and supported with additional resources.</p> <p><i>FTA-22-MBTA-CAT4-4.B</i> MBTA must implement the results of the training needs assessment.</p> <p><i>FTA-22-MBTA-CAT4-4.C</i> MBTA must consider opportunities and adopt technology and other resources to support training development and training management and record-keeping.</p>	Management, System-Wide Accessibility, HR, and IT.			
		2. Conduct a strategic planning session for SD 22-12 Finding 4 CAP implementation with the RCWG identified in Actionable Item #1.	11/30/22	Action Item Approved <u>Note:</u> FTA will review agendas and meeting notes to assess implementation of these sessions.	
		3. Migrate all current training documentation and tracking into the LMS (Learning Hub)	10/1/24	Action Item Approved <u>Note:</u> FTA will periodically review migration of training and documentation into the LMS.	
		4. Issue RFP for consulting services. This consulting engagement will be divided into 3 phases: (1) gap analysis, (2) content creation/revision, (3) Implementation of training programs.	1/15/23	Action Item Approved <u>Note:</u> FTA will ask MBTA to provide a presentation regarding the requirements to be included in the RFP prior to its release.	
		5. Onboard selected consultant	4/1/23	Action Item Approved <u>Note:</u> FTA will review the executed contract for the selected consultant to verify the scope of work and qualifications of the selected contractor to assure their ability to provide these activities.	
		6. MBTA will complete a third-party gap analysis and benchmarking of training in operations. This includes but is not limited to the following	6/30/23	Action Item Approved <u>Note:</u> FTA will ask MBTA to provide a presentation regarding the results of this assessment.	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		<p>items: available training content, in-person and OJT training programs, resources (human, technology, and physical space), organizational structure, etc.</p> <p>Required Action 4A</p>			
		<p>7. MBTA will review gap analysis and prioritize changes to current training programs. MBTA will establish a plan to address.</p>	7/31/23	Action Item Approved	
		<p>8. Develop a labor model and org structure to sustainably support operations training. This should include instructor resources, content development, LMS administration, etc. This will also include identifying space and technology needs to support ongoing training activities.</p> <p>Required action 4C</p>	4/30/24	<p>Action Item Approved</p> <p><u>Note 1:</u> The labor model and organization structure should apply to both operations and maintenance training.</p> <p><u>Note 2:</u> FTA will request periodic updates regarding the status of this activity.</p>	
		<p>9. Develop additional content needed to formalize training for all critical operations roles.</p> <p>Required Action 4B</p>	2/1/24	Action Item Approved	
		<p>10. Issue RFP for consulting services. This consulting engagement will be divided</p>	3/1/23	Action Item Approved	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		into 4 phases: (1) recommendation for required resources and organization, (2) LMS governance structure, (3) Learning path development and governance, (4) Steady-state training reviews and governance.		<u>Note:</u> FTA will ask MBTA to provide a presentation regarding the requirements to be included in the RFP prior to its release.	
		11. Onboard selected consultant	4/15/23	Action Item Approved	
		12. Review current org structure and propose a governance structure including (1) headcount and roles for centralized training, (2) structure for training governance and review, (3) development of learning paths by role	7/1/23	Action Item Approved <u>Note:</u> For the Operations Training component of this assessment, MBTA must ensure coordination with activities underway for SD 22-7 (FTA-LC-22-002, Action Item #3)	
		13. Develop training plan documentation for critical roles across operations and maintenance.	5/1/24	Action Item Approved	
		14. MBTA will develop a sustainable solution for reviewing and updating training plans and aligning on agency priorities for training	1/1/24	Action Item Approved	
		15. Develop metrics to measure success for each training division and create	5/1/24	Action Item Approved	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		dashboards to display those metrics.			
		16. MBTA will ensure front line staff have improved access to training curriculum by assessing potential digital solutions for each area of operations	11/1/24	Action Item Approved	
		17. 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.	11/1/24	Action Item Approved	
FTA-22-12-MBTA-CAT4-5	<p><u>Finding:</u> MBTA lacks formal resource manuals in key maintenance areas and does not currently provide employees with checklists or other tools to support training and implementation of maintenance rules and procedures.</p> <p><u>Required Actions:</u> <i>FTA-22-MBTA-CAT4-5.A</i></p> <p>In coordination with required actions already underway to address FTA's Special Directive</p>	1. Establish a working group of internal stakeholders to review and guide implementation of the corrective action plan aligned with SD 22-4 CAP 6.	11/30/22	Action Item Approved	
		2. Conduct a strategic planning session for SD 22-12 Finding 5 CAP implementation with the working group identified in Actionable Item #1.	12/15/22	Action Item Approved <u>Note:</u> FTA will review agendas and meeting notes to assess implementation of these sessions.	
		3. Issue RFP or Task Order for consulting services to support documenting or digitizing	2/28/23	Action Item Approved	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	<p>22-7, the MBTA must review its existing maintenance rules and procedures; identify opportunities for tools and checklists to support employees in carrying out maintenance rules and procedures; and develop, distribute, maintain, and update these materials.</p> <p><i>FTA-22-MBTA-CAT4-5.B</i></p> <p>MBTA must include frontline maintenance personnel in the development evaluation of these tools and checklists.</p>	<p>maintenance/repair instructions, identify opportunities for checklists and tools and assist with appropriate systems to aggregate and update digital resources.</p>		<p><u>Note:</u> FTA will ask MBTA to provide a presentation regarding the requirements to be included in the RFP prior to its release.</p>	
		<p>4. Onboard selected consultant</p>	<p>4/30/23</p>	<p>Action Item Approved</p> <p><u>Note:</u> FTA will review the executed contract for the selected consultant to verify the scope of work and qualifications of the selected contractor to assure their ability to provide these activities.</p>	
		<p>5. Catalog the preventive maintenance and inspection procedures performed by E&M departments.</p>	<p>12/31/22</p>	<p>Action Item Approved</p>	
		<p>6. Work with E&M and VM personnel and equipment OEMs to update/determine step by step instructions to be performed for each Safety and System Critical preventive maintenance task performed internally or by vendors and execute plan to transition to digital records.</p>	<p>10/31/23</p>	<p>Action Item Approved</p> <p><u>Note:</u> FTA will expect updates during each Bi-Weekly Meeting for SD 22-12 regarding development of these instructions until their completion.</p>	
		<p>7. Incorporate new/updated maintenance/repair procedures and instructions and verification tests into</p>	<p>12/31/23</p>	<p>Action Item Approved</p> <p><u>Note:</u> FTA will request period demonstrations of this</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		EAMS to better assist frontline personnel and improve record keeping.		incorporation as part of on-site activities in Calendar Year 2023.	
		8. Identify mobile EAMS platform functionality improvements to ensure PMI digitization adoption at all levels	1/31/24	Action Item Approved	
		9. Engage frontline staff to identify reference material, hardware configuration, and applications needed to improve work efficiency Required action 5.B	8/31/23	Action Item Approved <u>Note:</u> FTA expects to observe elements of this engagement during on-site activities.	
		10. Develop training for the various procedures and tasks. Training program should include detailed step by step instructions and verification tests for the procedures/tasks themselves, as well as how to complete these in EAMS using tablets. Training development will incorporate roles and responsibilities and training frequency. Training development will be aligned with requirements established in SD 22-12 CAP 4 .	10/1/24	Action Item Approved	
		11. The MBTA will continue to acquire and distribute tablets for maintenance personnel.	6/30/24	Action Item Approved	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		12. MBTA will implement the new training program to all applicable staff.	Ongoing	Action Item Approved	
		13. The MBTA will establish mobile access to the central repository of reference documentation to support work force knowledge of current requirements and facilitate periodic documentation review as established by SD 22-12 CAP 3 and referenced in step 9. Required action 5.A	6/30/24	Action Item Approved	
		14. The E&M department will determine a process for approving changes to the maintenance procedures, EAMS software and training program based on feedback from E&M personnel. Additionally, E&M will determine a process and frequency to review these programs in their entirety to ensure they remain effective and up to date as established in SD 22-12 CAP 2 . E&M will maintain performance metrics as a tool to measure success of this action plan and to guide maintenance and training program adjustments.	6/30/24	Action Item Approved	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		15. 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.	6/30/24	Action Item Approved	
FTA-22-12-MBTA-CAT4-6	<u>Finding:</u> Due to workforce turnover, MBTA’s new motorpersons and officials no longer have access to mentoring from experienced motorpersons and officials (inspectors, chief inspectors, and supervisors). <u>Required Actions:</u> MBTA must evaluate expanding its existing mentoring program from Bus Transit Operations to include new part-time and full-time rail transit operators or consider establishing a mentoring program specific to rail transit operations. In its evaluation, MBTA should consider opportunities and resources to support the professional development of rail transit operations personnel.	1. The MBTA will develop a cross-departmental MWG. This working group will include members from Transportation, the Training School, Safety, Labor Relations, and HR.	11/30/22	Action Item Approved.	
		2. Conduct a strategic planning session for SD 22-12 Finding 6 CAP implementation with the working group identified in Actionable Item #1.	12/31/22	Action Item Approved <u>Note:</u> FTA will review agendas and meeting notes to assess implementation of these sessions.	
		3. Issue RFP or Task Order for consulting services to support evaluating mentorship program	2/28/23	Action Item Approved <u>Note:</u> FTA will ask MBTA to provide a presentation regarding the requirements to be included in the RFP prior to its release.	
		4. Onboard selected consultant	4/30/23	Action Item Approved <u>Note:</u> FTA will review the executed contract for the selected consultant	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
				to verify the scope of work and qualifications of the selected contractor to assure their ability to provide these activities.	
		5. Gather materials from peer transit agencies to review and model rail transit professional development programs and identify key components and similarities.	7/1/23	Action Item Approved	
		6. The MBTA will review career pathways and on-the-job training for MBTA rail operations as well as different skill sets needed (both soft and technical). Match skills sets to program components identified in peer review. Identify gaps that require further development from MBTA.	9/1/23	Action Item Approved	
		7. Analyze current and budgeted headcount for rail transit positions in relation to career trajectories to establish overall need, program size, participation logistics and additional staffing needs.	11/1/23	Action Item Approved	
		8. Based on the tasks above, the MBTA will develop and present a proposal for mentorship of rail operations staff to MBTA Senior	12/20/23	Action Item Approved <u>Note:</u> Through CY 2023, FTA will confirm that MBTA Senior Leadership is directly engaged in	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		Leadership. This proposal will include a) a high-level overview of content, b) a draft implementation plan, c) definition of success, and d) any additional resources needed. (FTA SD 22-12, CAP 4, Item 9)		the development of the mentoring program. FTA expects that by the end of Calendar Year 2023, Senior Leadership would be aware of the proposed approach and ready to approve.	
		9. MBTA 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.	12/20/23	Action Item Approved	
FTA-22-12-MBTA-CAT4-7	<p><u>Finding:</u> Radio quality is deficient in several key locations and does not support adequate communications between OCC and field employees to ensure the safety of MBTA operations and maintenance.</p> <p><u>Required Actions:</u> FTA-22-MBTA-CAT4-7.A MBTA must confirm radio dead spots with frontline motorpersons and maintenance workers.</p>	<p>1. Radio Work Group will develop and compile a plan of action.</p> <p>2. Establish a regular meeting between SWR, the OCC and MCC</p> <p>3. Review the list of (18) Weak Spots reported, with the Radio Work Group discuss and assign personnel for site survey. Required Action 7.a</p>	<p>11/4/22</p> <p>11/4/22</p> <p>11/4/22</p>	<p>Action Item Approved</p> <p>Action Item Approved</p> <p><u>Note:</u> FTA will review agendas and meeting notes to assess implementation of these sessions.</p> <p>Action Item Approved</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
	<p><i>FTA-22-MBTA-CAT4-7.B</i> MBTA must improve the performance of its radio system in these dead spots.</p>	<p>4. All 18 Weak Spots to be surveyed by assigned staff and report needed equipment to complete repair.</p>	<p>11/4/22</p>	<p>Action Item Approved</p>	
		<p>5. Assigned Radio Staff will make the needed repairs after clearance of ROW.</p>	<p>11/4/22</p>	<p>Action Item Approved</p>	
		<p>6. Prepare an after-action report (AAR), Technicians are to complete the AAR, complete with a description of work, and completed testing results from Spectrum Analyzer and photos of repairs as required.</p>	<p>12/5/22</p>	<p>Action Item Approved <u>Note:</u> FTA will include follow-up verification for this AAR as part of FTA’s December on-site activities (week of December 5, 2022).</p>	
		<p>7. An AAR will establish a baseline record. These results will be compiled from the field by the Systemwide Radio Techs. Reports are to be forwarded to Safety, OCC Operations, and Sr. Staff. Required Action 7.b</p>	<p>3/30/23</p>	<p>Action Item Approved <u>Note:</u> FTA will include follow-up verification for this AAR as part of FTA’s on-site activities in April of 2023.</p>	
		<p>8. Compile all previous MBTA Radio SOP documentation and update procedures as warranted.</p>	<p>11/1/23</p>	<p>Action Item Approved</p>	
		<p>9. Radio Technicians will re-test and verify the noted weak spot areas on a Quarterly basis and Annually during the SWR Preventive Maintenance</p>	<p>10/30/24</p>	<p>Action Item Approved <u>Note:</u> FTA will request to review radio test reports.</p>	

**Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Training and Policies**

Identification Number	Finding and Required Action	Proposed CAP Items	Proposed Due Dates	FTA Comments	MBTA Response (if needed)
		<p>program (PM), scheduled for April-2023. An after-action report (AAR) will be completed and will be forwarded to Safety, OCC Operations and Sr. Staff.</p>			
		<p>10. 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>	<p>10/30/24</p>	<p>Action Item Approved</p>	