



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SENT VIA EMAIL**

September 26, 2023

Mr. Phillip Eng  
General Manager  
Massachusetts Bay Transportation Authority  
10 Park Plaza  
Boston, MA 02116

Subject: Approval – Corrective Action Plan Revision for Special Directive 22-12, Findings 1 and 2 (FTA-23-12-MBTA-CAT4-1)

Dear Mr. Eng:

Thank you and your team for submitting a revised corrective action plan (CAP) that addresses Findings 1 and 2 from Special Directive 22-12 (Operating Conditions and Policies, Procedures, and Training) issued by the Federal Transit Administration (FTA) on August 31, 2022. This revised CAP addresses seven required actions specified in SD 22-12.

The Massachusetts Bay Transportation Authority (MBTA) submitted the first version of this CAP revision on July 31, 2023, as requested by the FTA. After internal discussions and review with FTA, the MBTA decided to further revise the CAP to adjust the dates of the action items to occur in series rather than in parallel as originally submitted. MBTA submitted the updated revision on August 28, 2023.

**Approval of CAP Revision, FTA-23-12-MBTA-CAT4-1**

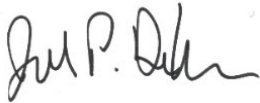
The goal of this CAP revision is to better focus MBTA resources on actions needed to improve implementation of safety rules by operating and maintenance departments and to enhance MBTA's capabilities to identify the reasons for deviations between formal, established standards, rules procedures, and actual operations and maintenance practices. The CAP revision specifies three distinct phases of activity: a 12-month compliance pilot program focused on rules surrounding Personal Protective Equipment (PPE); development of a data dashboard and supporting processes to monitor MBTA's overall compliance with safety rules; and revision and enhancement of MBTA's Safety Rules Compliance Program (SCRCP), including new forms, training, and digitization of program.

**Based on careful review of the revised CAP, and crosswalk to ensure that all required actions from Findings 1 and 2 in SD 22-12 are addressed, FTA approves FTA-23-12-MBTA-CAT4-1.**

With approval of this revised CAP, FTA will open new tracking for MBTA's responses to Findings 1 and 2 from SD 22-12 based on the action items specified in FTA-23-12-MBTA-CAT4-1 and will archive all previous submissions related to FTA-22-MBTA-CAT4-1.A through FTA-22-MBTA-CAT4-1.F and FTA-22-MBTA-CAT4-2.

We appreciate your efforts to enhance MBTA's safety performance, and we look forward to working with you as the MBTA continues to improve its safety rules compliance capabilities. If you have any question, please contact our Safety Management Inspection Coordinator Erin Powell at (771) 200-8016 or by email at [Erin.Powell@dot.gov](mailto:Erin.Powell@dot.gov).

Sincerely,



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

Enclosure: FTA-23-12-MBTA-CAT4-1 Corrective Action Plan Evaluation Matrix

cc: Ryan Coholan, Chief Operating Officer, MBTA  
Timothy Lesniak, Acting Chief Safety Officer, MBTA  
Katie Choe, Chief of Staff, MBTA  
Meredith Sandberg, Chief of Quality, Compliance, and Oversight,  
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MBTA  
Jamie Van Nostrand, Chair, Massachusetts Department of Public Utilities (DPU)  
Robert Hanson, Director, Rail Transportation Safety, DPU

**Corrective Action Plan (CAP) Evaluation Matrix**  
**Special Directive 22-12: Training and Policies – Revised CAP Submission for Findings 1 and 2 (FTA-23-12-MBTA-CAT4-1)**

Identification Number	Finding and Required Action	Proposed CAP Items	Estimated Start Date	Estimated End Date	FTA Comments	
FTA-23-12-MBTA-CAT4-1	<p><u>Finding 1:</u> Documented operating and maintenance rules and procedures are not implemented as required.</p> <p><u>Finding 2:</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 Actions:</u> <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. <i>FTA-22-MBTA-CAT4-1.B</i> Each department must establish and act on a</p>	<b>PPE Compliance Pilot</b>				
		1. <b>Set goal outcomes and measures for pilot:</b> Determine and align upon measurable desired outcomes from PPE pilot and broader rules review process and governance.	8/01/23	9/15/23	<b>Action Item Approved</b>  FTA notes that responsible parties for all action items are identified by Departments only (no specific names or titles). FTA will monitor the assignment of responsibility throughout CAP implementation and may request additional detail as part of CAP verification.	
		2. <b>Catalog current available data sources for PPE compliance:</b> List data sources (i.e., RCP 101, RCP 041, employee injuries, Safety observations, capital programs QA data, eBuilder daily reports, NCRs). Identify SMEs, identify data location and provide status. Gain access to data.	8/01/23	9/15/23	<b>Action Item Approved</b>  FTA will discuss how data has been identified and accessed during bi-weekly meetings.	
		3. <b>Review &amp; assess data sets:</b> Ingest data, evaluate what data is telling us, review for compatibility/format/records.	8/30/23	9/29/23	<b>Action Item Approved</b>	
		4a. <b>Mockup possible data visualizations and review with key stakeholders:</b> Based on data review and assessment, develop a wireframe for possible data visualization/dashboards to check with non-data expert	8/25/23	10/6/23	<b>Action Item Approved</b>  FTA will review wireframe as part of verification.	

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	<p>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></p> <p>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>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</p>	stakeholders that it is fit for purpose.				
		4b. <b>Perform Gap Analysis on data:</b> Determine if MBTA has all the data we need to identify trends in compliance; determine what data is missing/incomplete.	9/25/23	10/6/23	<b>Action Item Approved</b>	
		5. <b>Develop data to demonstrate PPE compliance:</b> Using standard data science practices, develop data flows, identify KPIs, build a concept dashboard/report, socialize with people; get feedback; refine report and the process; improve data; add data as more becomes available, incorporate analysis.	9/15/23	12/1/23	<b>Action Item Approved</b>	FTA will work with MBTA to confirm completion of these action items, including socialization of KPAs and data flows.
		5a. <b>Build dashboard/reporting on PPE compliance:</b> Building off the existing PPE compliance dashboard, incorporate additional data points to gain a wider view of PPE compliance. Include information about the number of people on the ROW on day and night orders.	9/18/23	10/20/23	<b>Action Item Approved</b>	FTA notes that the enhanced PPE compliance dashboard will be in place by October 20, 2023 -- FTA will monitor to confirm the changes made to the SCRPP PPE forms to address FTA's comments are included in the dashboard and used in the corresponding audits.
		5b. <b>Socialize the dashboard/reporting:</b> Present to SRCPSC (or appropriate organizational body), Exec Leadership and Chiefs of E&M,	10/23/23	11/17/23	<b>Action Item Approved</b>	

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	data to assess effectiveness of actions and to improve compliance with safety rules and procedures. <i>FTA-22-MBTA-CAT4-2</i> 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.	Capital, Construction Logistics, Operations – get feedback for improvements.				
		5c. <b>Improve dashboard:</b> Make changes, as needed, to improve DB. Identify any additional data needed.	11/20/23	12/01/23	<b>Action Item Approved</b>	
		6. <b>Establish feedback loop to Departments:</b> Establish process for informing depts about PPE compliance, present use of dashboards, request comments or ideas for areas of improvement.	10/23/23	11/17/23	<b>Action Item Approved</b>	
		7. <b>Assess effectiveness of pilot:</b> Continue publishing the dashboard/reporting monthly. Evaluate metrics for improvement with PPE compliance. Continue to improve data and dashboard.	12/01/23	8/16/24	<b>Action Item Approved</b>  FTA will request access to monthly reports generated from dashboard and metrics used for evaluation as part of CAP verification.	
		8. <b>Feedback into the overall compliance process:</b> Develop lessons learned from pilot. Any steps missing from process? What kind of resourcing and timelines are realistic to achieve desired outcomes.	12/01/23	1/31/24	<b>Action Item Approved</b>	
		<b>Mechanism to Monitor Operations Rules Compliance (Steps to Support Operationalization)</b>				
		9a. <b>Determine prioritized rules categories for establishing</b>	9/11/23	11/22/23	<b>Action Item Approved</b>	

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		<b>compliance monitoring for select key rules:</b> Establish and align with end users on a sequence of thematic compliance areas to cultivate data flows based on an agreed upon prioritization framework (e.g. high risk of non-compliance, hypothesis of frequent non-compliance, etc.)			
		9b. <b>Set goals and objectives:</b> Determine and align upon measurable desired outcomes for rules compliance: KPIs	9/11/23	12/29/23	<b>Action Item Approved</b>
		9c. <b>Set cadence for review of progress toward goals:</b> Determine level of compliance/improvements MBTA wants to achieve at a regular cadence (i.e., 1 year later, 2 years later)	9/11/23	12/29/23	<b>Action Item Approved</b>  FTA will review cadence and prioritization and expects iterative enhancements.
		10. <b>Catalog current available data sources for compliance:</b> List data sources, identify SMEs, identify data location and provide status. Gain access to data.	10/24/23	12/22/23	<b>Action Item Approved</b>
		11. <b>Review and assess data sets:</b> Ingest data, evaluate what data is telling us, review for compatibility/format/records.	11/06/23	1/05/24	<b>Action Item Approved</b>
		12. <b>Perform Gap Analysis on data:</b> Determine if MBTA has all the data we need to identify trends	1/08/24	2/01/24	<b>Action Item Approved</b>

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		in compliance; determine what data is missing/incomplete.			
		13. <b>Compile currently available data into dashboard and reports &amp; identify trends:</b> Update dashboard to show current view of thematic compliance within Operations at the MBTA	10/24/23	2/01/24	<b>Action Item Approved</b>  FTA will review dashboard, trend reports, and accessed data as part of verification.
		14. <b>Data transformation:</b> Using standard data science practices, develop data flows, identify KPIs, build concept dashboards/reports, socialize with people; get feedback; refine report and the process; improve data; add data as more becomes available, incorporate analysis.	2/01/24	1/31/25	<b>Action Item Approved</b>  FTA will review data flows, use of KPIs, reports, and socialization at set intervals throughout this period as part of verification.  FTA will focus on how management practices and on-the-ground procedures ensure the collection of quality of data to support the dashboard and ensure meaningful KPIs.
		14a <b>Cultivate data flows:</b> Using available data, simplify datasets and optimize most used queries.	2/01/24	4/05/24	<b>Action Item Approved</b>
		14b <b>Confirm report/dashboard KPIs:</b> Confirm what are the appropriate KPIs for each reporting/dashboard (i.e., If injuries go over XXX/week, flips to red; iterate)	2/01/24	3/01/24	<b>Action Item Approved</b>  FTA will review KPIs as part of verification.
		14c <b>Build initial dashboard prototype:</b> Identify size of the world (i.e., # of people on the	2/12/24	3/11/24	<b>Action Item Approved</b>

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		ROW), visualize the data; set cadence for updating. Mock-up of dashboards.			FTA will expect meeting or briefing on prototype as part of verification.
		14d <b>Present &amp; review dashboard with end users and frontline workers:</b> Socialize the dashboards – does it tell us what we need to know about compliance? How can it be improved? Are there elements that are not being captured correctly?	3/11/24	4/12/24	<b>Action Item Approved</b>  FTA will observe employee engagement activities as part of CAP verification.
		14e <b>Produce &amp; distribute reporting to end users and frontline workers:</b> Socialize the reporting – is it usable for Departments to improve compliance?	3/11/24	4/12/24	<b>Action Item Approved</b>  FTA will observe employee engagement activities as part of CAP verification.
		14f. <b>Provide feedback on dashboard/reporting:</b> Review dashboard/reporting for usefulness; sanity check; how can it be improved?	4/12/24	4/26/24	<b>Action Item Approved</b>
		14g <b>Socialize lessons learned from PPE compliance pilot; assess mechanism for improvement:</b> Use any lessons learned from PPE compliance pilot to inform the dashboards and reporting for other thematic compliance areas (e.g., Operator behavior, ROW safety, etc.	1/15/24	5/09/24	<b>Action Item Approved</b>  FTA notes that PPE Pilot is largely owned by QCO and Ops Analytics. Lessons learned may not be as applicable for other Departments.



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		14h <b>Improve dashboard:</b> Use feedback from 14e to improve; continue assessment through the length of the pilot; feedback loop to the front-line workers as compliance improves or declines.	4/12/24	1/03/25	<b>Action Item Approved</b>
		14i. <b>Improve reporting:</b> Use feedback from 14f to improve; continue assessment through the length of the pilot; feedback loop to the front-line workers as compliance improves or declines.	4/12/24	1/03/25	<b>Action Item Approved</b>
		14j. <b>Continue to develop data flows, add to reporting:</b> As data flows mature/become available, add to dashboard/reporting.	4/12/24	1/03/25	<b>Action Item Approved</b>  FTA will conduct iterative verification regarding this CAP action item.
		15. <b>Provide updated current reporting to SCRP steering committee:</b> Establish cadence for updates to compliance dashboard. Submit updated compliance report to SRCPSC on monthly basis.	2/05/24	3/07/25	<b>Action Item Approved</b>
		16. <b>Assess meeting structure, cadence, and purpose:</b> Assess existing meeting structure for SRCP, Safety, event investigation and any meetings that lead to root cause determination or Rules/policy/procedure revision. Determine how they will work	10/24/23	1/24/24	<b>Action Item Approved</b>

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		with the SRCP and working group meetings.			
		17. <b>Mapping the existing rules governance:</b> Assess how rules, policies, procedures are currently revised; Rules – via SO; policies – Administration’s Policy WG; procedures – each dept owns/updates their SOPs	10/24/23	1/24/24	<b>Action Item Approved</b>
		18. <b>Formalize process to inform Departments when trends are identified, both positive and negative:</b> SRCPSC to inform operating departments if trends are identified. Establish process for report/email from SRCP committee to Chief of Dept w/trends. Plan on monthly feedback report for both positive (no trends identified, all RCPs completed etc... or negative (trend of non-compliance identified, recommend actions to be undertaken etc...).	10/24/23	6/07/24	<b>Action Item Approved</b>  FTA will assess how SCRP Steering Committee informs operating and maintenance departments if trends have been identified regarding non-compliance and how the SCRP Steering Committee ensures the individual department's role in overseeing implementation of key safety rules, addressing non-compliance.
		19. <b>Report to Executive Leadership:</b> Establish method to report to executives (i.e., revise/add compliance to SDAR); report when Areas do not complete the required # of RCP audits; report positive and negative trends.	10/24/23	6/07/24	<b>Action Item Approved</b>  FTA will review reports as part of CAP verification.

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		20. <b>Establish method for determining root cause for non-compliance:</b> Establish process for determining/investigating root cause for non-compliance of non-major safety events; incorporate root causes identified by incident/event investigation.	12/08/23	2/07/24	<b>Action Item Approved</b>  FTA notes that MBTA's Safety Event Investigation Manual (Revision 3.2, October 2021) includes section 9.1 (Human Factors Analysis and Classification System (HFACS)) and Section 9.2 (Root Cause Analysis).
		21. <b>Analyze data monthly:</b> On a monthly basis, review notable safety events, assess contributing factors and create matrix to enable analysis to identify commonalities, to link to root causes. Continue throughout the pilot on a monthly cadence. Submit monthly.	2/7/24	2/07/25	<b>Action Item Approved</b>  FTA will review results of analysis as part of CAP verification.
		22. <b>Assess workforce to support root cause analysis investigations:</b> Perform staffing analysis to identify # of employees needed whose roles and responsibilities include investigation for minor events/identified trends in non-compliance; consider a group in alignment with Safety for SMS & event investigation. Coordinate with work underway with SD 22-9 and 22-10.	2/07/24	5/09/24	<b>Action Item Approved</b>  FTA notes that MBTA's Safety Event Investigation Manual (Revision 3.2, October 2021) includes section 9.1 (Human Factors Analysis and Classification System (HFACS)) and Section 9.2 (Root Cause Analysis) and that MBTA Safety has developed training on implementing these procedures, which may be useful.
		23. <b>Establish process for referral to Working Group responsible for rules assessment:</b> Establish	12/8/23	3/08/24	<b>Action Item Approved</b>

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		process for SRCPSC to refer issues to Rules working group. Four WGs were established March 2023 and continue meeting regularly.			
		24. <b>Revise charter for RAWG:</b> Update charter to reflect purposed of RAWG. Include process for referral to RRWG when RAWG recommends any revisions, including a feedback loop to the RAWG and front-line workers from the RRWG.	10/24/23	12/08/23	<b>Action Item Approved</b>  FTA will confirm representation of operations and maintenance departments addressed in SD 22-12 in the RAWG.
		25. <b>Update the rosters:</b> Revise four RAWG rosters to reflect shift to front line workers.	10/24/23	12/08/23	<b>Action Item Approved</b>
		26. <b>Hold RAWG workshops:</b> Establish cadence/series of workshops for 4 RAWGs; workshops to review top 3-5 most frequently violated rules, delve into root cause.	10/09/23	12/08/23	<b>Action Item Approved</b>  FTA may observe workshops as part of CAP verification.
		27. <b>Establish cadence of future meetings:</b> Use results of workshop to determine appropriate cadence for RAWGs.	10/24/23	12/08/23	<b>Action Item Approved</b>
		28. <b>Establish process to refer rules changes to Rules Review Working Group (RRWG):</b> Develop process to refer rules that require revision to RRWG, including a	12/08/23	3/08/24	<b>Action Item Approved</b>

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		feedback loop to RAWG that recommended the revision.			
		29. <b>Establish administrative support for RAWG and RRWG:</b> Identify staff/position to support RAWG & RRWG. Perform staffing analysis to determine if additional staff should be hired. Coordinate with work under SD 22-9 and SD 22-10.	2/07/24	5/09/24	<b>Action Item Approved</b>
		30. <b>Revise charter for RRWG:</b> Update charter to reflect any change in purpose of RRWG.	11/07/23	12/08/23	<b>Action Item Approved</b>
		31. <b>Create a recommended governance hierarchy for rules, policies and procedures:</b> Establish who is signatory(s) what is hierarchy; connect to a role not a person; establish ‘if I want to change something, who reviews, who approves.’	1/24/24	6/07/24	<b>Action Item Approved</b>
		<b>Safety Rules Compliance Program (SRCP) Review/Update</b>			
		32. <b>Review SRCP:</b> Review MBTA’s SRCP with consultant support.	9/01/23	2/23/24	<b>Action Item Approved</b>  Note: FTA has repeatedly expressed concern regarding the effectiveness of the SRCP as a mechanism for overseeing rules compliance. While FTA appreciates MBTA’s focus on revamping and digitizing this program, and evaluating current SRCP governance, FTA also expects to see a strong focus on

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					ensuring its quality, through the administration of effective rules compliance checks.
		32a <b>Evaluate compliance best practices:</b> Transit & other (i.e. aviation, manufacturing) industry best practices for rules compliance.	9/01/23	11/10/23	<b>Action Item Approved</b>
		32b <b>Review SCRP manual and documents:</b> Review SRCP manual, RCP forms, cadence of audits	9/01/23	12/08/23	<b>Action Item Approved</b>  FTA will review revised materials as part of CAP verification.
		32c <b>Evaluate current SCRP governance:</b> Map who has the authority to ensure RCP requirements are met; who is accountable when areas do not comply with required cadence. Who reports and monitors on cadence. Evaluate composition of SRCP committee.	11/13/23	2/23/24	<b>Action Item Approved</b>  FTA likely will request briefing on activities and results for this action item.
		33. <b>Gap assessment:</b> Determine what is missing from our program and what is not aligned with a best practice.	2/26/24	3/08/24	<b>Action Item Approved</b>  FTA will actively verify MBTA’s conduct of the gap assessment, ensuring its thoroughness.
		34. <b>Evaluate creating digital forms:</b> Quantify what it would take to convert all RCP forms from paper to digital (automated/knock) and what digital equipment would be	10/02/23	11/10/23	<b>Action Item Approved</b>

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		needed by folks who perform audits. Assess potential benefits <i>(i.e. data in real time, increase # of audits performed)</i>			
		35. <b>Pilot of digitized forms:</b> Select a HR line to pilot digital RCPs. Give appropriate employees digital device with the application; choose which (if not all) RCPs will be performed digitally. Run pilot for 120 days, evaluate with feedback from employees and revise as needed.	11/10/23	3/28/24	<b>Action Item Approved</b>
		36. <b>Recommend changes to SRCP:</b> Recommend revisions to components of SRCP programs, potentially including duties and composition of SRCP committee; RCP forms and procedures; methods of administering audits; cadence of audits; scheduling of audits; appropriate governance	3/28/24	5/24/24	<b>Action Item Approved</b>  In addition to reviewing all of the materials, FTA will expect a briefing on the proposed changes as part of CAP verification.
		37. <b>Feedback loop for recommended changes to SRCP:</b> Socialize proposed changes with impacted departments; gather feedback from employees performing audits, as well as those reviewing outputs and identifying trends	5/27/24	7/26/24	<b>Action Item Approved</b>
		38. <b>Assess administrative support personnel for SRCP:</b> Labor model for personnel required to support	5/27/24	7/26/24	<b>Action Item Approved</b>

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		SRCP across the authority; hire as needed.			FTA will look to assess coordination with workforce assessment activities underway in SD 22-9.
		39. <b>Revise SRCP:</b> Revise SRCP manual, audit forms and processes as needed.	7/27/24	10/25/24	<b>Action Item Approved</b>
		40. <b>Develop training materials for revised SRCP materials:</b> Develop LMS module; practical training elements as needed. Coordinate with efforts under SD 22-9.	10/27/24	12/10/24	<b>Action Item Approved</b>
		41. <b>Training of personnel:</b> Train impacted employees, in phases. Coordinate with training with ongoing work under 22-12 CAP 4.	12/10/24	3/28/25	<b>Action Item Approved</b>
		42. <b>CAP verification:</b> Perform verification activities.	3/27/24	8/25/25	<b>Action Item Approved</b>