



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

November 7, 2024

Ms. Leslie S. Richards
General Manager/Chief Executive Officer
Southeastern Pennsylvania Transportation Authority
1234 Market Street, 10th Floor
Philadelphia, PA 19107

Subject: Action Plan and Implementation Schedule for Required Action FTA-24-1-001-1

Dear Ms. Richards,

Thank you and your team at the Southeastern Pennsylvania Transportation Authority (SEPTA) for submitting an action plan and implementation schedule addressing Required Action FTA-24-1-001-1 from Special Directive 24-1, "Required Actions to Protect Transit Workers at SEPTA." This Special Directive was issued as part of the Federal Transit Administration's (FTA) Safety Management Inspection (SMI) of SEPTA and the Pennsylvania Department of Transportation (PennDOT). SEPTA submitted the documents, as required, on October 3, 2024.

Required action FTA-24-1-001-1 requires SEPTA to develop an action plan to safeguard the welfare of transit workers on the SEPTA system from assault on rail and bus transit modes.

Approval of Action Plan and Implementation Schedule for Required Action FTA-24-1-001-1

FTA has reviewed the Transit Worker Welfare Protection Action Plan and Implementation Schedule and supporting documents and approves SEPTA's action plan and implementation schedule for FTA-24-1-001-1.

FTA finds that SEPTA's submission demonstrates a comprehensive approach to addressing transit worker safety through physical infrastructure improvements, enhanced security measures, expanded employee training, public education, and improved data collection. The implementation schedule outlines clear timelines and responsible parties for each action item.

Conclusion

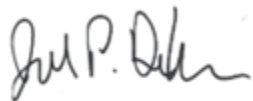
SEPTA should proceed with implementing the approved plan according to the provided schedule. FTA will monitor SEPTA's progress through regular updates and ongoing verification activities.

The attached Evaluation Matrix includes information on some of the verification activities FTA anticipates conducting as you implement your plan. These activities will allow FTA to comprehensively assess SEPTA's implementation of individual action items, ensuring they meet the commitments outlined in the action plan and implementation schedule. FTA may conduct additional verification activities as needed.

Pursuant to required action FTA-24-1-001-2, beginning 30 calendar days after the date of this letter, SEPTA must provide monthly progress reports on its implementation of the approved plan for FTA-24-1-001-1 until FTA closes required action FTA-24-1-001-1 or until otherwise notified by FTA.

We greatly appreciate your commitment to the safety of the SEPTA system and its transit workers and passengers. Should you have any questions, please contact Francis Alomia, Special Directive Coordinator, at (470) 859-1677 or Francis.Alomia@dot.gov.

Sincerely,



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

Attachment: FTA-24-1-001-1 Action Plan and Implementation Schedule Evaluation Matrix

cc: Ms. Sarah Powell, Deputy Chief Transformation Officer – Safety Culture
Mr. Ronald Keele, Chief Safety Officer, SEPTA
Mr. Charles Lawson, Chief of Police, SEPTA
Mr. David Hunter, Deputy Chief Safety Officer – Safety Management Systems, SEPTA
Mr. Erik Johanson, Senior Director of Budgets & Transformation, SEPTA
Ms. April Dorcak, Director of Regulatory Compliance, SEPTA
Ms. Julie Bender, Director of QA/QC & Interagency Coordination, SEPTA
Mr. Gino Benedetti, General Counsel, SEPTA
Ms. Meredith Biggica, Deputy Secretary for Multimodal Transportation, PennDOT
Ms. Elizabeth Bonini, State Safety Oversight Division Chief, PennDOT
Ms. Terry Garcia Crews, Regional Administrator, FTA Region 3
Mr. Tony Tarone, Deputy Regional Administrator, FTA Region 3
Mr. David Burns, General Engineer, FTA Region 3

**FTA-24-1-001-1 Action Plan and Implementation Schedule Evaluation Matrix
Special Directive 24-1: Required Actions to Protect Workers at SEPTA**

Action Plan and Implementation Schedule Evaluation Matrix: Special Directive 24-1: Required Actions to Protect Workers at SEPTA					
Finding 1: SEPTA Must Expand Activities to Protect Transit Workers from Assault					
Required Action FTA-24-1-001-1: Within 90 days of issuance of this report, SEPTA must develop an action plan that includes actions to be taken, required resources, dedicated funding sources, milestones to implement, and oversight activities to safeguard the welfare of transit workers on the SEPTA system from assault on rail transit and bus modes. SEPTA must submit the action plan to FTA for review, approval, and implementation monitoring.					
Action Item Tracking No.	SEPTA Action Item	SEPTA Owner	SEPTA Deliverable	SEPTA Due Date	FTA Response
Area #1: Redesign of Operator Cabs					
FTA-24-1-001-1-01	Assessment of trolley fleet cab enclosures	Vehicle Engineering	Assessment report submitted to SEPTA's leadership	3/31/2025	<p>Action Items Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review assessment report for trolley fleet cab enclosures. • Review cab redesign-related VMIS work orders, Engineering Change Notices, and Automotive Engineering Bulletins to verify proper documentation and approval processes. • Inspect retrofitted buses to verify the proper installation of window sash locks, emergency egress windows, and operator protective barriers. • Review bus procurement documents to verify specifications for enhanced operator protection features, including full enclosures where applicable. • Inspect design and procurement documents and procurement schedules to determine how these requirements are being addressed in trolley cabs. • Compare implementation progress against the timeline provided in this plan. • Interview bus and trolley operators on the effectiveness and usability of the new cab
FTA-24-1-001-1-02	Installation of Full Enclosure Prototype (1 Bus)	Vehicle Engineering	[Vehicle Management Information System (VMIS)] work order verification	6/30/2025	
FTA-24-1-001-1-03	Installation of Full Enclosures (7 Additional Buses)	Vehicle Engineering	VMIS work order verification	6/2024-3/2026	
FTA-24-1-001-1-04	Full implementation of Window Sash Locks on bus fleet	Vehicle Engineering	VMIS work order verification (Retrofit) and Asset creation in VMIS (New Bus Delivery)	3/31/2026	
FTA-24-1-001-1-05	Full implementation of Emergency Egress Windows on bus fleet	Vehicle Engineering	VMIS work order verification (Retrofit) and Asset creation in VMIS (New Bus Delivery)	3/31/2026	
FTA-24-1-001-1-06	Installation of Full Enclosure (Remaining [Bus] Fleet)	Vehicle Engineering	VMIS work order verification (Retrofit) and Asset creation in VMIS (New Bus Delivery)	3/2026-3/2029 ¹	
FTA-24-1-001-1-07	Initial delivery of new Trolley Streetcars	Vehicle Engineering	Asset creation in VMIS (New Vehicle Delivery)	7/2027 ² -11/2031	

¹ Assuming successful mini fleet testing and evaluation completion.

² Pilot vehicle.

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					designs. <ul style="list-style-type: none"> Review the results of the pilot installations, including operator feedback.
Area #2: Management of Emergency Alarms					
FTA-24-1-001-1-08	Expanded Protocols for Emergency Alarms (e.g., <i>Silent Bus Alarms</i>)	Transit Police	Standard Operating Procedure	12/31/2024	<p>Action Items Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Examine updated Standard Operating Procedures (SOPs) for emergency alarm response, ensuring they align with the action plan and incorporate best practices for rapid response. Interview SEPTA Control Center Managers (CCMs) and Transit Police Dispatchers and observe a simulated emergency alarm scenario to assess their familiarity with the new protocols and their ability to implement them effectively. Review documentation of coordination efforts with local law enforcement, including training materials developed for police on silent bus alarm notifications and response procedures. Examine emergency alarm activations records, response times, and outcomes over a set period (e.g., 3-6 months). Observe operation of the "live look-in" capability, verifying its functionality and effectiveness in real-time monitoring of emergency situations.
FTA-24-1-001-1-09	Develop Training for Local Law Enforcement on Silent Bus Alarm Notifications	Transit Police	New Training Materials	3/31/2025	
FTA-24-1-001-1-10	Finalize "Live Look-in" Protocols [remote access to bus cameras to monitor and assess situations in progress]	Transit Police	Standard Operating Procedure	5/31/2025	

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Area #3: Managing Security for End-of-Line Locations and Enhanced Bus Patrol					
FTA-24-1-001-1-11	Development of Priority Routes/Locations for Collaboration with External Partners	Transit Police	Documented Communication between SEPTA Transit Police and Philadelphia Police Department	1/31/2025	<p>Action Items Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Participate in ride-alongs with the Surface Transportation Unit (STU) to observe patrol operations, interactions with transit workers, and response to incidents at end-of-line locations and on bus routes. • Examine data analytics tools and methodologies used by the STU to identify problem routes and security hotspots. Verify that this data is being used to inform deployment strategies. • Conduct unannounced visits to end-of-line locations to observe security presence, procedures in place, and overall safety conditions for workers. • Review documentation of SEPTA's collaboration with local law enforcement agencies, particularly the Philadelphia Police Department. • Verify implementation of joint patrols and spot checks on board surface transportation vehicles. • Observe operation of the Virtual Patrol program, assessing how real-time CCTV monitoring is utilized to enhance security and guide resource deployment.
FTA-24-1-001-1-12	Develop Standard Operating Procedures for Transit Police Response related to Operator Safety and Security	Transit Police	Standard Operating Procedure	5/31/2025	

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					<ul style="list-style-type: none"> Review records of incidents detected and responded to through the Virtual Patrol program.
Area #4: Expansion of SCOPE Program					
FTA-24-1-001-1-13	Creation of two new SCOPE Field Supervisor Positions	Transit Police	Organization Chart	3/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Confirm two new SCOPE field positions are hired. Interview newly hired SCOPE field supervisors about their roles and responsibilities. Observe newly hired SCOPE field supervisors performing their work. Review SCOPE program data to assess impact on reducing homelessness on the SEPTA system.
Area #5: Enhance Training for SEPTA Workers					
FTA-24-1-001-1-14	Enhanced Bus Operator Refresher Training Course Including the Transit Police Training Material	Training Department	Finalized Rise Articulate Program Guide	12/31/2024	<p>Action Items Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Conduct unannounced visits to training sessions, including de-escalation and trauma-informed care courses, to directly observe content delivery, instructor effectiveness, and worker engagement.
FTA-24-1-001-1-15	Explore new Technologies to Provide Realistic Scenario Training	Training Department	Assessment of potential options (including Training dept decisions)	3/31/2025	

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					<ul style="list-style-type: none"> • Examine full curriculum and materials for all enhanced training programs, including the Red Kite Project workshops, to ensure they align with the action plan and incorporate best practices in transit worker safety and customer service. • Review completion records to verify that targeted workers receive the enhanced training as scheduled, including checking the progress of the Annual Bus Operator Refresher Training course enhancements. • Analyze post-training surveys and feedback from workers who have completed the enhanced training programs to assess their perceived value and effectiveness. • Review implementation and outcomes of the Team Valor program, including interviewing peer mediators and examining case records to assess its effectiveness in resolving conflicts. • Evaluate effectiveness of the on-site counseling program by reviewing usage data, interviewing counselors, and soliciting voluntary feedback from workers who have utilized the service. • Observe and assess implementation of new training technologies, such as the artificial intelligence/virtual reality soft skills training. Review any pilot program

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					results and plans for full implementation.
Area #6: Public Education and Outreach					
FTA-24-1-001-16	Operator Assault Public Awareness Campaign	Communications	<ul style="list-style-type: none"> • Public Education Campaign – Operator Assaults • Operator Assault Campaign Signage • Operator Assault Campaign Distribution List • Operator Assault Campaign Social Media Post • Operator Assault Campaign Webpage 	6/2024	Action Items Approved To verify implementation, FTA will, at a minimum: <ul style="list-style-type: none"> • Conduct a comprehensive inspection of SEPTA vehicles, stations, and facilities to verify the presence and proper placement of campaign materials related to operator assaults, student fare card usage, and general safety messaging. • Review social media analytics, website traffic data, and other digital metrics provided by SEPTA to assess the reach and engagement of SEPTA's online public education efforts, including the operator assault campaign and student fare card campaign. • Examine results of any public surveys conducted by SEPTA to gauge awareness and impact of their public education campaigns. If no such surveys exist, recommend implementing them and review the methodology. • Assess implementation and impact of the SEPTA Spotlight series with the local ABC television channel, including reviewing aired segments and analyzing
FTA-24-1-001-17	Student Fare Card Campaign	Communications	<ul style="list-style-type: none"> • No Cap Tap Ad • Student Fare Card Media Assets Distribution List • Student Fare Card Social Media Post • Student Fare Card Social Media Post 2 • Student Fare Card Webpage 	8/2024-10/2024	
FTA-24-1-001-18	Public Education Campaign	Communications	<ul style="list-style-type: none"> • Code of Conduct Webpage • Public Education Bus Shelters Public Education Bus Wrap • Public Education Implementation Schedule 	12/2024-11/2025	

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			<ul style="list-style-type: none"> Public Education Social Media Post 		<p>any resulting public feedback or increased awareness.</p> <ul style="list-style-type: none"> Review documentation of SEPTA's collaboration with local school districts, particularly regarding the distribution of Student Fare Cards and associated educational materials.
FTA-24-1-001-1-19	SEPTA Spotlight Series with ABC local	Communications	SEPTA Spotlight Series	Underway and Ongoing	<ul style="list-style-type: none"> Evaluate progress of the planned year-long, multi-media campaign (scheduled for 12/2024-11/2025) that reinforces SEPTA's commitment to transit worker safety. Review records of any community events, forums, or other direct outreach efforts conducted by SEPTA to educate the public about transit safety and respect for transit workers. This could include interviewing staff involved in these outreach efforts.
Area #7: Data Collection & Reporting					
FTA-24-1-001-1-20	Distribution of (New) Operator Assault Report, internally and externally, to FTA-24-1-003-2	Operations Administration and Finance	Distributed Report (Included in deliverable for Required Action FTA-24-1-003-2)	10/2024 (ongoing)	<p>Action Items Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Examine reports for comprehensiveness, consistency, key metrics inclusion, and trend analysis. Perform on-site audit of data collection accuracy, staff training, incident categorization, and protocol compliance. Review integration of assault data with

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					<p>other relevant datasets and its use in decision-making.</p> <ul style="list-style-type: none"> • Confirm distribution of reports to internal and external stakeholders, including FTA.