



U.S. Department  
of Transportation

**Federal Transit  
Administration**

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SENT VIA EMAIL**

March 19, 2025

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

**Subject: Response to Closeout Request for FTA-22-MBTA-CAT2-1 (SMS Implementation)**

Dear Mr. Eng:

On December 17, 2024, the Massachusetts Bay Transportation Authority (MBTA) submitted a Corrective Action Plan (CAP) closeout request for FTA-22-MBTA-CAT2-1 (Safety Management System Implementation). MBTA developed this CAP as part of its response to findings and required actions issued in category 2 of Special Directive (SD) 22-10: Prioritization of Safety Management Information. The Federal Transit Administration (FTA) initiated this special directive and the associated requirements in August 2022 to address the findings of a Safety Management Inspection (SMI).

**Closeout Approval for FTA-22-MBTA-CAT2-1 (SMS Implementation)**

MBTA submitted the first version of this CAP, FTA-22-MBTA-CAT2-1, on October 15, 2022. After several months, MBTA and FTA determined that MBTA should resubmit this CAP (and all other CAPs for Special Directive 22-10) to ensure they were logically structured and sequenced and provided sufficient detail. MBTA submitted a CAP rewrite request to restructure the CAPs accordingly, and FTA approved MBTA's request on May 19, 2023. On September 11, 2023, MBTA submitted the revised CAP, FTA-22-MBTA-CAT2-1, and FTA approved the CAP on October 12, 2023.

During the CAP rewrite, MBTA indicated to FTA that it planned to utilize the first five action items from its original CAP as part of the rewritten CAP. These five action items had been accepted by FTA under the original CAP, and FTA agreed to review MBTA's previous submissions as part of the new CAP.

This CAP includes 19 action items to address the following SD 22-10 findings and required actions:

- **Finding 1:** MBTA has not ensured that the necessary structures are in place to support effective

implementation and operation of its SMS.

- **Required Action 1.A:** MBTA must conduct a critical and comprehensive review of its entire SMS planning, implementation, and operational processes and activities to address the gaps discussed in this finding.
- **Required Action 1.B:** MBTA must update its SMS Implementation Plan to reflect the results of this review, including defined actions, timeframes, responsibilities, and expected outcomes.

Between October 30, 2022, and September 6, 2024, MBTA undertook the following CAP action items (and submitted documentation regarding their completion):

- Established a CAP advisory group
- Conducted a strategic planning session
- Procured consulting services
- Onboarded a selected consultant
- Reviewed SMS documents
- Established an SMS steering committee
- Identified an SMS lead
- Developed CAP status monitoring and reporting
- Prepared for a refocused gap analysis
- Performed a refocused SMS gap analysis
- Apportioned actions from outcomes of the SMS analysis
- Revised SMS Project planning for safety event investigations and ESRP
- Revised SMS project planning for other processes
- Updated SMS implementation and project plans
- Issued a memo to operating managers
- Updated SMS trainings
- Reissued SMS trainings
- Performed CAP verification
- Developed a PMP and integrated schedule

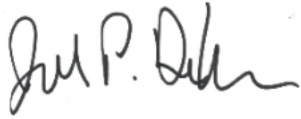
FTA carefully evaluated the submitted documentation and reviewed submissions with MBTA during biweekly meetings on SD 22-10 between October 2022 and February 2025.

Based on review of these submissions, FTA finds that these completed action items adequately satisfy the requirements of FTA-22-MBTA-CAT2-1, and this CAP may now be closed.

## Conclusion

This CAP closure represents a tremendous amount of work, and FTA greatly appreciates your efforts. Please contact our SMI Coordinator, Christian Hernandez, by phone at (213) 552-3494 or by email at [Christian.hernandez@dot.gov](mailto:Christian.hernandez@dot.gov), with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe P. DeLorenzo".

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

cc: Peter Butler, Regional Administrator, FTA Region 1  
Ryan Coholan, Chief Operating Officer, MBTA  
Tim Lesniak, Chief Safety Officer, MBTA  
Meredith Sandberg, Chief of Quality, Compliance, and Oversight, MBTA  
Pat Lavin, Chief Safety Officer, Massachusetts Department of Transportation  
Jamie Van Nostrand, Chair, Massachusetts Department of Public Utilities (DPU)  
Robert Hanson, Rail Safety Director, DPU