



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

April 2, 2025

Mr. Scott Sauer
Interim General Manager/Chief Executive Officer
Southeastern Pennsylvania Transportation Authority
1234 Market Street, 10th Floor.
Philadelphia, PA 19107

Subject: Closeout for Required Action FTA-24-3-007 (Multimodal Certification)

Dear Mr. Sauer,

On December 2, 2024, the Southeastern Pennsylvania Transportation Authority (SEPTA) submitted an analysis of the impact of multimodal certification at SEPTA's Victory District. Required action FTA-24-3-007—which is associated with Finding 6 of Special Directive (SD) 24-3: “Required Actions to Address Findings from the Federal Transit Administration (FTA) Safety Management Inspection [(SMI)] Conducted at the SEPTA Related to Bus and Rail Safety Issues Contributing to Safety Events”—required this submission.

Closeout for FTA-24-3-007 (Multimodal Certification)

To address this required action, on December 2, 2024, SEPTA submitted an analysis of bus and rail operator resources at Victory District and the impact of multimodal certification on training, resources, hours of service, safety events, and worker confidence in their ability to perform their job duties safely. As documented in the submission, SEPTA states that, after changes it implemented since the SMI, its Victory District staffing levels are sufficient and that its analysis of safety events did not indicate that multimodal certification impacted safety.

In operator surveys documented in the submission, Victory District operators report an overall high level of confidence in their ability to perform their job duties safely. However, surveys documented in the submission indicated that:

- 49-percent of surveyed operators believe they should receive additional training before operating a rail mode after a three-month or longer period since their last rail operations.

- 89-percent of surveyed operators feel more training is necessary to confidently operate different modes.

SEPTA's request to close this required action SEPTA cites the conclusion reached in its analysis that multimodal certification does not impact safety, but also acknowledges that current training resources are insufficient to meet the District's training needs. SEPTA states that it will increase training resources to the District under its proposed plan to address FTA-24-3-003, which relates to the overall adequacy of training resources, submitted on February 3, 2025.

FTA agrees that additional resources devoted to training will ensure operators receive training on the schedule SEPTA has established, address the existing backlog of operators who need multimodal certification, and address the results of SEPTA's submitted analysis. FTA also agrees that SEPTA can reasonably address the need for additional training resources under FTA-24-3-003. Through FTA-24-3-003, FTA will continue to monitor resources devoted to Victory District operator training.

Although FTA is not requiring SEPTA to end multimodal certifications at Victory District or to reduce the amount of time between trainings for multimodal operators, FTA strongly encourages SEPTA to reconsider the length of time between trainings for multimodal operators. This is consistent with recommendations identified by the operators responsible for multimodal operations in SEPTA's own surveys.

FTA carefully evaluated the submitted documentation and reviewed submissions with SEPTA during biweekly meetings on SD 24-3 between August 2024 and February 2025.

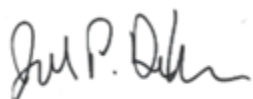
FTA finds that the submissions satisfy the requirements of required action FTA-24-3-007 and this required action may now be closed.

FTA will continue to monitor SEPTA's activities to address training resource needs through FTA-24-3-003 and, prior to closing Special Directive 24-3, FTA may conduct a final verification related to this required action.

Conclusion

This required action closure represents a tremendous amount of work and FTA greatly appreciates your efforts. Please contact Syed Ahmed, Special Directive Coordinator, by phone at (202) 603-6765 or by email at Syed.Ahmed@dot.gov with any questions.

Sincerely,



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

cc: Sarah Powell, Deputy Chief Transformation Officer – Safety Culture, SEPTA
Brad Okoniewski, Chief Safety Officer, SEPTA
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