



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

May 20, 2025

Ms. Meredith Biggica
Deputy Secretary for Multimodal Transportation
Pennsylvania Department of Transportation
Keystone Building
400 North St., Fifth Floor
Harrisburg, PA 17120

Subject: Response to Closure Request for FTA-24-5-011-2 (Oversight of Sufficiency of SEPTA REE&M Training Program)

Dear Ms. Biggica,

On March 12, 2025, the Pennsylvania Department of Transportation (PennDOT) submitted a request to close required action FTA-24-5-011-2, which is associated with Finding 11 of Special Directive 24-5: “Required Actions to Strengthen Safety Oversight of the Southeastern Pennsylvania Transportation Authority’s [(SEPTA)] Rail Transit System.”

Required action FTA-24-5-011-2 states that: “PennDOT must review and assess the sufficiency of [the Rail Equipment Engineering & Maintenance Department’s (REE&M)] training and require corrective action as needed. PennDOT must submit the assessment (and corrective actions if applicable) to FTA for review, approval, and implementation monitoring.”

Response to Closure Request

While we appreciate PennDOT’s efforts in reviewing REE&M training, we are unable to close this required action based on PennDOT’s submissions at this time. FTA identified gaps in the documentation intended to demonstrate a comprehensive review and assessment of the sufficiency of REE&M training. Specifically, while PennDOT did interview senior leadership and review training materials, PennDOT’s submission ultimately did not demonstrate an assessment of the sufficiency of the training. In light of this, FTA cannot approve PennDOT’s closure request and instead requires resubmission as described below.

Actions Required to Address FTA-24-5-011-2 (Oversight of Sufficiency of SEPTA REE&M Training Program)

To fully address Required Action FTA-24-5-011-2, PennDOT must demonstrate that it conducted a substantive assessment of the sufficiency of SEPTA's REE&M training program. This means going beyond a basic review of training materials with limited supporting documentation and interviews with senior leadership. In addition to those actions, PennDOT should focus on training delivery, assessment, and effectiveness. If PennDOT has already performed an in-depth assessment, it must provide supporting evidence. If not, PennDOT must conduct a comprehensive evaluation and update its submission to reflect the findings. Examples of appropriate activities to assess the sufficiency of the training program are provided below.

- **Interviews with REE&M frontline/field workers who have received REE&M training or other mechanism to identify workers' assessment of the sufficiency of training.** Provide evidence that PennDOT interviewed frontline/field workers who have received REE&M training to solicit feedback and identify areas for improvement.
- **Observation of training sessions or other mechanism to assess the delivery of training content.** Provide evidence that PennDOT observed training sessions to assess training delivery and student engagement.
- **Review of instructor workloads or other mechanism to demonstrate that there are sufficient instructor resources to support the training program.** Provide evidence that PennDOT reviewed instructor workloads to assess whether technical and vehicle maintenance instructors can meet the requirements of classroom training, field observations, and other instructional demands.
- **Review of work orders for corrective maintenance activities to identify weaknesses in training or other mechanism to demonstrate that training is effective in preventing errors that could be corrected by training.** Provide evidence that PennDOT reviewed corrective maintenance documentation to identify potential weaknesses in the training program.
- **Observation of field reviews for technical competence or other mechanism to demonstrate that the training program is sufficient to ensure workers' technical competence.** Provide evidence that PennDOT observed field reviews conducted to ensure workers' technical competence to identify potential weaknesses in the training program and to validate that field reviews appropriately identify potential weaknesses in training program.

Conclusion

If PennDOT has already conducted activities beyond those documented in its original assessment to assess the sufficiency of REE&M training, PennDOT must submit evidence of those activities and a detailed explanation of how those activities were adjudicated in the submitted assessment.

If PennDOT has not conducted activities beyond those already documented, PennDOT must:

- Conduct additional activities designed to assess the sufficiency of the training program.
- Submit evidence of conducting these activities.

May 20, 2025

Page 3

- Submit an updated assessment (and corrective actions if applicable) that reflects PennDOT's findings from these activities.

PennDOT must submit this information within 60 business days of the date of this letter, at which time FTA will continue monitoring implementation.

If you have any questions, please contact Special Directive Coordinator Syed Ahmed at syed.ahmed@dot.gov.

We appreciate your continued cooperation and commitment to safety oversight.

Sincerely,



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

cc: Ms. Elizabeth Bonini, Director, State Safety Oversight Office, PennDOT
Mr. J.M. McLaughlin, State Safety Oversight Regional Manager, PennDOT
Ms. Terry Garcia Crews, Regional Administrator, FTA Region 3
Mr. Tony Tarone, Deputy Regional Administrator, FTA Region 3
Mr. Jonathan Wohlhagen, General Engineer, FTA Region 3