



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

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SENT VIA EMAIL**

May 29, 2025

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

**Subject: Approval – Joint Action Plan for Special Directive 24-3, Finding 4 (FTA-24-3-004) and Finding 5, Required Action 2 (FTA-24-3-005-2)**

Dear Mr. Sauer:

Thank you and your team at the Southeastern Pennsylvania Transportation Authority (SEPTA) for submitting a joint action plan and implementation schedule to address Required Actions FTA-24-3-004 and FTA-24-3-005-2 from Special Directive 24-3: “Required Actions to Address Bus and Rail Transit Safety Issues Contributing to Safety Events at the Southeastern Pennsylvania Transportation Authority.” The Federal Transit Administration (FTA) issued this Special Directive as a result of a Safety Management Inspection (SMI) of SEPTA and the Pennsylvania Department of Transportation (PennDOT). This resubmission, received February 3, 2025, addresses FTA’s comments on SEPTA’s initial, November 1, 2024, submission.

Required Action FTA-24-3-004, which addresses Finding 4 from Special Directive 24-3,<sup>1</sup> directs SEPTA to “develop an action plan and implementation schedule to ensure that each bus and trolley operator regularly receives a performance evaluation focused on their ability to safely provide services.” Required Action FTA-24-3-005-2, which is one of two required actions addressing Finding 5 from the same Special Directive,<sup>2</sup> requires SEPTA to develop an action plan and implementation schedule to improve learning for all operators, including a new-hire safety performance mentoring and coaching program designed to reinforce safety expectations and support early operator development through positive engagement. Both required actions direct SEPTA to submit an action plan and implementation schedule for FTA review, approval, and implementation monitoring.

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<sup>1</sup> Finding 4 from Special Directive 24-3 found that “SEPTA Does Not Conduct Regular Performance Evaluations for Transit Operators”

<sup>2</sup> Finding 5 from Special Directive 24-3 found that “SEPTA Does Not Provide Sufficient Support to Help New Operators Manage SEPTA’s Operating Environment and Perform Duties Safely”

## **Approval of Joint Action Plan and Implementation Schedule for FTA-24-3-004 and FTA-24-3-005-2**

SEPTA's joint action plan outlines several performance management enhancements, including:

- Routine safety-focused performance evaluations for operators
- A structured peer mentoring program supported by formal training and documentation
- Increased ride-along and coaching by the Training Department
- Expansion of the mentorship program across all transit modes

The implementation schedule outlines action items SEPTA will perform and provide documentation for from March 2025 through December 2025. Consistent with the timeline for the Supervisory Workforce Assessment that will be performed as part of SEPTA's work to address Required Action FTA-24-3-002 (Supervisor-to-Transit Operator Ratio) from the same Special Directive, SEPTA's work for this Required Action may include additional activities conducted into calendar year 2026, as determined by the results of the assessment.

FTA has reviewed the joint action plan, supporting documentation, and implementation schedule. FTA held multiple meetings with SEPTA to review proposed action items for this joint action plan and those for Required Action FTA-24-3-002, which includes an assessment that will be used in this joint action plan. FTA appreciates SEPTA shortening some of their deadlines. While FTA understands and accepts SEPTA's rationale for the proposed updated timeline, namely, that an assessment of the scale and scope SEPTA intends to conduct necessitates a long timeline, we remain concerned about the length of time required to achieve significant improvement in the oversight and coaching of new transit operators. Accordingly, FTA can only conditionally approve the submitted joint plan for FTA-24-3-004 and FTA-24-3-005-2. In addition to the steps outlined in SEPTA's submission, FTA also requires SEPTA to provide a list of current mitigations that have already been implemented to address the potential safety risks associated with these required actions. FTA may request periodic updates to this list during the implementation period, and based on the results of onsite verification activities, may direct SEPTA to take further action if warranted.

## **Conclusion**

SEPTA should proceed with implementing the approved plan according to the provided schedule. Strict adherence to the timeline and deliverables is required. FTA will maintain rigorous oversight of SEPTA's progress through:

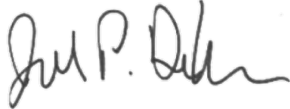
- Regular progress updates from SEPTA on biweekly meetings
- Comprehensive verification activities
- Active engagement to identify opportunities for expedited implementation.

The attached Evaluation Matrix incorporates FTA's requirement for interim mitigations into the overall action plan and provides information on some of the verification activities FTA anticipates conducting as SEPTA implements the 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.

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 Special Directive Coordinator Syed Ahmed at [syed.ahmed@dot.gov](mailto:syed.ahmed@dot.gov).

Sincerely,



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

Attachment: FTA-24-3-004 and FTA-24-3-005-2 Joint Action Plan and Implementation Schedule Evaluation Matrix

cc: Ms. Sarah Powell, Deputy Chief Transformation Officer – Safety Culture  
Mr. Brad Okoniewski, Chief Safety Officer, 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. Jonathan Wohlhagen, General Engineer, FTA Region 3