



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

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

June 3, 2025

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

Subject: Approval – Action Plan and Implementation Schedule for Special Directive 24-3, Finding 2 (FTA-24-3-002)

Dear Mr. Sauer:

The Federal Transit Administration (FTA) issued Special Directive (SD) 24-3 to the Southeastern Pennsylvania Transportation Authority (SEPTA) to require it to address findings documented in a Safety Management Inspection (SMI) report of SEPTA and the Pennsylvania Department of Transportation (PennDOT). SD 24-3 includes Required Action FTA-24-3-002, which directs SEPTA to assess the supervisor-to-transit-operator ratios across its fixed-route bus, trolley, and heavy rail operations and develop an action plan ensuring adequate oversight of transit operators performing safety-sensitive functions. Required Action FTA-24-3-002 also requires SEPTA to submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.

FTA received SEPTA's initial assessment of its supervisor-to-transit-operator ratios on October 3, 2024. FTA received the first version of the associated action plan for Required Action FTA-24-3-002 on November 22, 2024. Based on FTA feedback regarding the extended timeline SEPTA proposed in its first version, SEPTA provided an updated version on February 3, 2025, that reduced the timeline by around three months. While FTA would prefer an even shorter timeline, FTA appreciates that SEPTA's process includes a comprehensive assessment that encompasses three required actions under SD 24-3, including FTA-24-3-002. As described more fully below, FTA conditionally approves the submitted action plan for Required Action FTA-24-3-002 as long as SEPTA provides a list of the current mitigations in place to manage the safety risk associated with under-supervised transit operators.

Approval of Action Plan and Implementation Schedule for FTA-24-3-002

SEPTA's action plan includes a commitment to conduct a Supervisory Workforce Assessment and develop a Corrective Action Plan (CAP) to address the results of the assessment. This assessment will be designed to evaluate supervisory staffing, responsibilities, and programs across all transit modes. The assessment will also examine workload distribution, regulatory compliance, and industry best practices to generate recommendations that strengthen operator

oversight. Based on this assessment, SEPTA will develop and submit a CAP to FTA for review, approval, and implementation monitoring. The CAP will be designed to address the results of the assessment within 18 months following FTA approval.

FTA has reviewed the action plan, supporting documentation, and implementation schedule. After multiple meetings with SEPTA to review proposed action items and the timeline for implementation, FTA conditionally approves the submitted plan for Required Action FTA-24-3-002.

It is important to note that while FTA understands and accepts SEPTA's rationale for the proposed schedule (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 before implementation of significant supervisory improvements. Accordingly, as part of its approval, FTA requires SEPTA to provide a list of current mitigations in place to manage the safety risk associated with under-supervised transit operators within two months of the date of this letter. This requirement is included in the attached Evaluation Matrix as Action Item 1. As SEPTA executes its approved action plan for Required Action FTA-24-3-002, FTA may request periodic updates, and based on the results of onsite verification activities, may direct SEPTA to take further action if warranted while the assessment is being completed and the CAP developed for FTA approval.

Conclusion

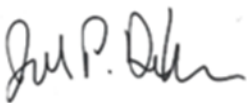
SEPTA should proceed with implementing the conditionally approved action plan in accordance with the provided timeline. Strict adherence to the established schedule and deliverables is required. FTA will continue to provide close oversight of SEPTA's progress through:

- Regular progress updates during biweekly meetings
- Comprehensive verification activities
- Ongoing collaboration to identify opportunities to expedite implementation

The attached Evaluation Matrix incorporates FTA's request for interim mitigations into the overall action plan and outlines preliminary verification activities FTA anticipates conducting. These activities will help ensure that SEPTA's progress aligns with the commitments in the approved plan. FTA may supplement these verification activities as necessary.

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.

Sincerely,



Joe DeLorenzo

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

Attachment: FTA-24-3-002 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