

FTA-24-6-002-2 Corrective Action Plan Evaluation Matrix
Special Directive 24-6: Required Actions to Address Safety Risk to Rail Transit Roadway Workers

Corrective Action Plan (CAP) Evaluation Matrix: Special Directive (SD) 24 6 to the Metropolitan Transportation Authority (MTA) New York City Transit (NYCT) to Address Safety Risk to Rail Transit Roadway Workers				
Finding 1: NYCT Must Take Additional Action to Ensure Compliance with and Sufficiency of NYCT's RWP Program Required Action FTA-24-6-002-2: Within 100 days of issuance of this Directive, NYCT must develop a CAP to address the results of weekly internal monitoring activities required in FTA-24-6-002-1 and submit to FTA for review, approval, and implementation monitoring. Within 30 days of FTA's approval of the CAP, NYCT must begin monthly reporting on its progress to address the CAP to FTA.				
FTA Action Item Tracking No.	NYCT Action Item	NYCT Deliverables	NYCT Due Date	FTA Response
FTA-24-6-002-2-01	Issue Positive Compliance Bulletin ¹ based on the results of NYCT's six-week safety audit blitz conducted in calendar year 2024.	<ul style="list-style-type: none"> Positive Compliance Bulletin 24-65, issued 10/11/2024² Maintenance of Way (MOW) Supervisory Daily Checklist as distributed in Department of Subway (DOS) Bulletin 24-33 	10/11/2024 (submitted and under FTA verification)	Action Item Approved and Under Verification To verify implementation, FTA may, at a minimum: <ul style="list-style-type: none"> Review NYCT trending and compliance tracking specific to requirements issued under Bulletin 24-65.
FTA-24-6-002-2-02	Conduct safety audits on an increased frequency to assess compliance with NYCT's Roadway Worker Protection (RWP) program.	Verbal reports during scheduled SD 24-6 meetings and monthly written reports on not less than... <ul style="list-style-type: none"> Eight Joint Track Safety Audits per week Six Department of Subway (DOS) Safety Management Audits per week Eight Quality Assurance Vital Track Inspection (QAVTI) Audits per week Six Maintenance Supervisory Field Audits per week Two Staten Island Railway Management Safety Audits per week 	Ongoing; verbal reports given during scheduled SD 24-6 meetings Ongoing; written reports submitted no later than the 30 th of the following month <i>NYCT must continue conducting audits and submitting reports no less frequently than</i>	Action Item Approved and Under FTA Verification To verify implementation, FTA may, at a minimum: <ul style="list-style-type: none"> Review schedule of audits to ensure audits are performed based on a representative sample of hours and days during which RWP-related activities occur. Conduct onsite observations of auditing activities to confirm performance, rigor, and efficacy.

¹ NYCT describes a Positive Compliance Bulletin as a bulletin that details responsibilities of all affected workers and reinforces individual accountability for compliance via their confirmation that they received and understand it.

² Bulletin 24-65, among other right-of-way safety requirements, requires completing the Maintenance of Way Supervisory Daily Checklist as required by DOS Bulletin 24-33.

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		<ul style="list-style-type: none"> One Safety Efficiency Testing Team Audit block³ per week One Facility Manager safety audit per manager per month Any MOW "No Meetings Day" safety audits specific to or including RWP-related activities Any DOS Efficiency Team or Maintenance Supervisor safety audits specific to or including RWP-related activities Any DOS Safety representative observations conducted at the request of divisional management specific to or including RWP-related activities 	<i>stated in the submitted CAP and this matrix until notified otherwise by FTA</i>	
FTA-24-6-002-2-03	<p>Assess safety impact of increased safety audit frequency (Action Item 2 above) to determine whether audits should continue to be conducted at the same cadence.</p> <p>Note: NYCT must continue conducting audits no less frequently than stated in the</p>	Safety audit frequency assessment	1/31/2026	<p>Action Item Approved</p> <p>To verify implementation, FTA may, at a minimum:</p> <ul style="list-style-type: none"> Review safety risk assessment conducted to assess safety impact of more frequent safety audits, including the projected impact of: <ul style="list-style-type: none"> Continuing safety audits at the frequency in Action Item 2 above. Decreasing the frequency of

³ Multiple audit sessions occur during one audit block.

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	submitted CAP and in this matrix until notified otherwise by FTA.			<p>safety audits.</p> <ul style="list-style-type: none"> ○ Increasing the frequency of safety audits. • Review data used to support the assessment. • Interview NYCT and contractor support personnel on the inputs and results of the assessment. • Interview supervisors, frontline workers, or other relevant workers on the frequency of safety auditing.
FTA-24-6-002-2-04	<p>Assess safety impact of Safety Hazards and Risk Prevention (SHARP) program, including:</p> <ul style="list-style-type: none"> • Safety stand-downs • One-on-one sessions • Maintenance supervisor safety briefing classes • Manager safety auditing classes • Follow-up audits (audits conducted to ensure noncompliance) 	SHARP program assessment	1/31/2026	<p>Action Item Approved</p> <p>To verify implementation, FTA may, at a minimum:</p> <ul style="list-style-type: none"> • Review assessment conducted to assess safety impact the SHARP program. • Review data used to support the assessment. • Interview NYCT and contractor support personnel on the inputs and results of the assessment. • Interview supervisors, frontline workers, or other relevant workers

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	identified in previous auditing activities has been corrected) <ul style="list-style-type: none"> Presentations to induction classes 			on the SHARP program.
FTA-24-6-002-2-05	DOS and Office of System Safety (OSS) will continue to meet to review DOS and OSS RWP observation results as part of continuously monitoring the program for compliance and effectiveness and make adjustments based on identified trends.	Meeting notes or minutes from scheduled monthly DOS/OSS meetings	Ongoing; monthly notes or minutes submitted by no later than the 30 th of each month for the previous month's meeting	Action Item Approved To verify implementation, FTA may, at a minimum: <ul style="list-style-type: none"> Request verbal updates on the outcomes of monthly NYCT DOS/OSS monthly meetings held to discuss and respond to the results of auditing activities. Attend scheduled monthly DOS/OSS meetings as an observer. Compare provided data with actions taken as a result of the data to improve safety. Interview DOS Safety personnel on improvements to safety data trending and analysis of RWP program for potential improvements.
FTA-24-6-002-2-06		Documentation of any actions taken as a result of these meetings, including, but not limited to: <ul style="list-style-type: none"> Updates to safety audit process or practices Corrective action to address deficiencies, such as anonymized disciplinary actions, retraining, safety bulletins, or work orders 	Ongoing; documentation submitted within 15 business days of promulgation	