



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

October 1, 2025

Mr. Phillip Eng
General Manager
Massachusetts Bay Transportation Authority
10 Park Plaza
Boston, MA 02116

Subject: Response to Closeout Request for FTA-23-MBTA-CAT2-2R (Prioritizing Safety Risk)

Dear Mr. Eng:

On June 11, 2025, the Massachusetts Bay Transportation Authority (MBTA) submitted a Corrective Action Plan (CAP) closeout request for FTA-23-MBTA-CAT2-2R (Prioritizing Safety Risk). MBTA developed this CAP as part of its response to Required Actions 2.1–2.4 and 3.A–3.D from Special Directive (SD) 22-10. The Federal Transit Administration (FTA) issued SD 22-10 in August 2022 as a result of the Safety Management Inspection (SMI). As described more fully below, FTA finds that MBTA has addressed the aforementioned required actions, and this CAP is now closed.

Closeout Approval for FTA-23-MBTA-CAT2-2R (Prioritizing Safety Risk)

MBTA submitted the first version of this CAP, originally two separate CAPs on October 14, 2022. On October 28, 2022, MBTA and FTA determined that MBTA would resubmit both of these CAPs (and all other CAPs for SD 22-10) to ensure they were logically structured and sequenced and provided sufficient detail. MBTA resubmitted the SD 22-10 CAPs on November 18, 2022. FTA approved these initial CAPs on January 13, 2023. On May 12, 2023, MBTA submitted a CAP relief and rewrite request to restructure CAPs to consolidate tasks. FTA approved MBTA's request on May 19, 2023. On September 11, 2023, MBTA submitted the revised, combined CAP, FTA-23-MBTA-CAT2-2R, and FTA approved the CAP on October 13, 2023.

The final CAP includes 27 action items to address the following SD 22-10 findings and required actions:

- **Finding 2:** MBTA executive leadership does not receive prioritized and actionable information related to safety risks or shortcomings in safety risk mitigations
- **Finding 3:** MBTA Executive Management does not consistently ensure its decisions related to

safety risks are based on safety data analysis or documented facts.

- **Required Action 2.1:** Work with safety and operating department leads (including maintenance and engineering departments) to define explicit criteria for prioritizing safety risks.
- **Required Action 2.2:** Include explicit safety risk acceptance criteria into its Agency Safety Plan and/or reference documents.
- **Required Action 2.3:** Work with MBTA's Safety Department and operating department leads (including maintenance and engineering departments) to define how safety information must be presented to MBTA leadership in a prioritized and actionable manner.
- **Required Action 2.4:** Require, and provide means for, operating department leads (including maintenance and engineering departments) to elevate proposed safety risk mitigations, including their status, that require MBTA leadership approval for resourcing. This must include safety risk mitigations deemed ineffective or inappropriate and that require executive level decision regarding the redirection of, or additional, resourcing.
- **Required Action 3.A:** MBTA must map its safety data flows and supporting processes.
- **Required Action 3.B:** MBTA must establish explicit accountabilities and responsibilities for safety data flows as a component of safety information management (collection, analysis, communication, storage, and retrieval of safety data).
- **Required Action 3.C:** MBTA must provide formal training in safety information management to relevant personnel.
- **Required Action 3.D:** MBTA must demonstrate that its executive management uses and promotes the usage of safety data analysis and/or documented facts in decision-making related to safety risk.

Between October 30, 2022, and June 11, 2025, MBTA undertook the following CAP action items (and submitted documentation regarding their completion):

- Established a CAP advisory group
- Conducted a strategic planning session
- Procured consulting services
- Onboarded a selected consultant
- Performed a data inventory
- Mapped data flows and processes
- Assessed SMS database gaps
- Planned pilot projects
- Evaluated and reconfigured data flows
- Established data flow training materials
- Trained responsible parties for data flows
- Initiated a workshop and established safety risk tiers for pilot projects
- Initiated safety risk tiers development
- Workshopped safety risk tiers
- Established safety risk tiers

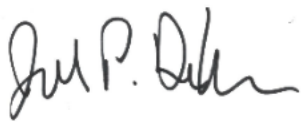
- Incorporated risk tiers into risk software
- Initiated, workshopped, and established elevation risk criteria for pilot projects
- Initiated safety information elevation criteria
- Workshopped safety information elevation criteria
- Established safety information elevation criteria
- Incorporated risk tiers and evaluation criteria for pilot projects
- Incorporated elevation criteria into risk software
- Initiated automated reporting
- Completed automated reporting
- Provided management training on risk elevation and software use
- Tracked data analysis
- Performed CAP verification

FTA carefully evaluated the submitted documentation and reviewed submissions with MBTA during biweekly meetings on SD 22-10 between October 2022 and September 2025.

Based on review of these submissions, FTA finds that these completed action items adequately satisfy the requirements of FTA-22-MBTA-CAT2-2, FTA-22-MBTA-CAT2-3.A, FTA-22-MBTA-CAT2-3.B, FTA-MBTA-CAT2-3.C and FTA-MBTA-CAT2-3.D and this CAP is now closed.

Please contact our SMI Coordinator, Christian Hernandez at Christian.hernandez@dot.gov, with any questions.

Sincerely,



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

cc: Peter Butler, Regional Administrator, FTA Region 1
Ryan Coholan, Chief Operating Officer, MBTA
Tim Lesniak, Chief Safety Officer, MBTA
Meredith Sandberg, Chief of Quality, Compliance, and Oversight, MBTA
Pat Lavin, Chief Safety Officer, Massachusetts Department of Transportation
Jamie Van Nostrand, Chair, Massachusetts Department of Public Utilities (DPU)
Robert Hanson, Rail Safety Director, DPU