



**Massachusetts Bay
Transportation Authority**

Safety Panel Report Update

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Overview

- Classification Scheme
- Tracking and Scheduling
- Implementation Status



Classification Scheme

- **Green** – Completed & Monitoring
 - All fully-verified one-time recommendations or recommendations permanently integrated into SMS processes
- **Yellow** – In Progress
 - Implementation in process; awaiting status update from business unit, escalation to next-tier safety committee for further action, or review and verification of closure submittal
- **Red** – On Hold
 - Implementation paused due to external factors



Tracking and Scheduling

- Tracking

- Safety staff maintain and archive tracking tools, meeting presentation materials, and verification documentation
- Safety maintains responsibility for completing and verifying status changes (e.g., **In Progress** > **Complete**)

- Timing and Scheduling

- Data Analysis Groups (DAGs), Safety Management Working Groups (SMWGs), and Safety Management Review Committee (SMRC) meet monthly; Executive Safety Council (ESC) convenes on a quarterly basis
- Each committee reviews all assigned recommendations each meeting
- Deadlines associated with recommendation tasks and subtasks are reviewed and updated monthly



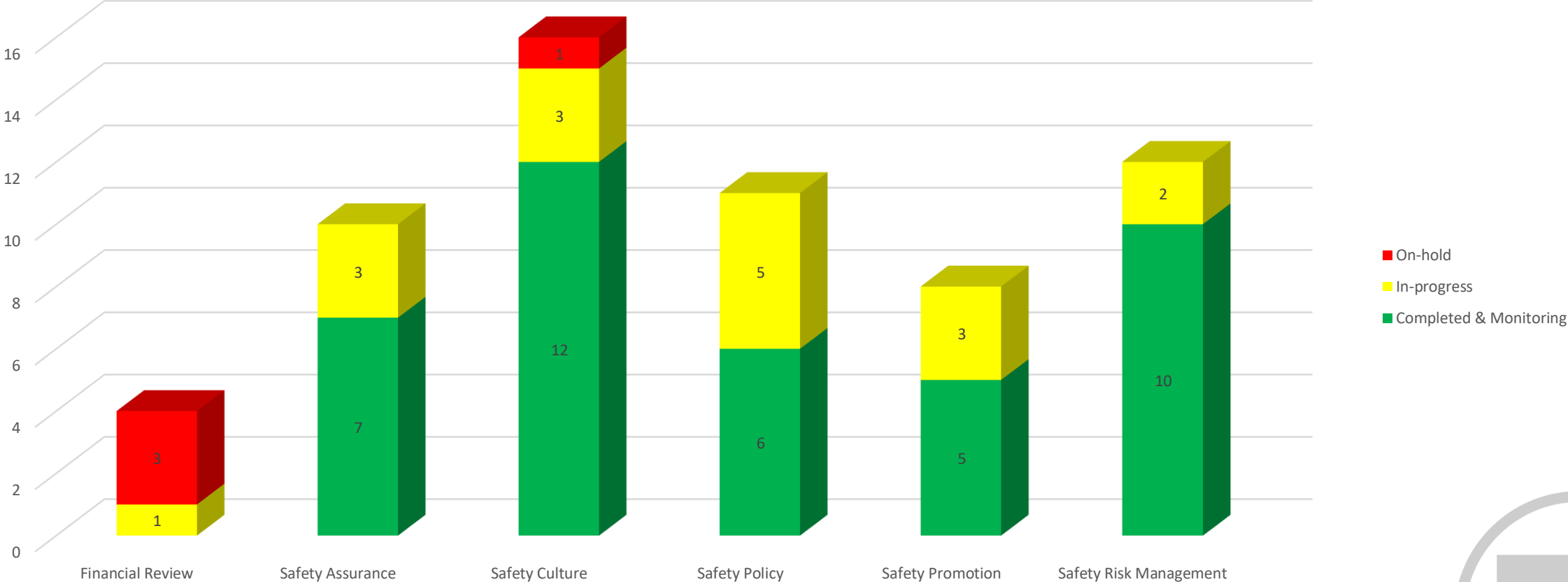
Recommendation Implementation Status

SRP Recommendations Implementation Status



Implementation Status by Category

SRP Implementation Status by Recommendation Category



Appendix: Recommendation Implementation Status Tables



Safety Policy

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Policy	1	<p>MBTA management does not have defined safety objectives, safety performance targets and safety performance indicators. This circumstance has made executive leadership and the FMCB “blind” to organizational risk.</p> <p>Effective PMI programs, as well as QA/QC activities, are the agency’s primary defenses against operational incidents. Intense concentration on these activities should be one of the central focuses of an accident investigation. More importantly, simply performing required PMIs and having effective QA/QC programs will dramatically reduce operational incidents.</p>	1a	<p>MBTA management must establish safety objectives, safety performance targets and safety performance indicators. These metrics should include both operations and safety performance targets, i.e. derailments, collision, efficiency testing, training, employee and customer injury data as well as compliance rates with PMIs activities for each department and other key performance data as determined by senior management.</p>	Completed & Monitoring
Safety Policy	1	<p>MBTA management does not have defined safety objectives, safety performance targets and safety performance indicators. This circumstance has made executive leadership and the FMCB “blind” to organizational risk.</p> <p>Effective PMI programs, as well as QA/QC activities, are the agency’s primary defenses against operational incidents. Intense concentration on these activities should be one of the central focuses of an accident investigation. More importantly, simply performing required PMIs and having effective QA/QC programs will dramatically reduce operational incidents.</p>	1b	<p>The establishment of PMI safety performance targets and safety performance indicators must ensure that these activities:</p> <ul style="list-style-type: none"> • are aligned with industry best practices, • are occurring at the required frequency • are monitored to ensure they have not been inappropriately suspended or discontinued, • are monitored to ensure required mid-life or other critical system overhauls are conducted, • have sufficient human capital to be carried out, • are properly funded. 	Completed & Monitoring



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Safety Policy	1	<p>MBTA management does not have defined safety objectives, safety performance targets and safety performance indicators. This circumstance has made executive leadership and the FMCB “blind” to organizational risk.</p> <p>Effective PMI programs, as well as QA/QC activities, are the agency’s primary defenses against operational incidents. Intense concentration on these activities should be one of the central focuses of an accident investigation. More importantly, simply performing required PMIs and having effective QA/QC programs will dramatically reduce operational incidents.</p>	1c	Once the above metrics are established, the safety objectives, performance targets and indicators must be formally communicated by MBTA management throughout the agency (as appropriate), reviewed and periodically updated, and used to inform the allocation of resources.	In-progress
Safety Policy	1	<p>MBTA management does not have defined safety objectives, safety performance targets and safety performance indicators. This circumstance has made executive leadership and the FMCB “blind” to organizational risk.</p> <p>Effective PMI programs, as well as QA/QC activities, are the agency’s primary defenses against operational incidents. Intense concentration on these activities should be one of the central focuses of an accident investigation. More importantly, simply performing required PMIs and having effective QA/QC programs will dramatically reduce operational incidents.</p>	1d	MBTA must establish effective organization-wide QA/QC programs.	In-progress



Safety Policy

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Policy	2	A select portion of PMIs activities were intentionally suspended on the transit side of the agency.	2	MBTA management must identify and correct all areas where deferred maintenance is occurring.	In-progress
Safety Policy	3	There is little or no data to support what PMIs are required, or what has been accomplished.	3	MBTA management must ensure that sufficient resources are directed toward expediting the implementation of data collection systems, to include, but not be limited to all MOW departments, training and medical departments.	Completed & Monitoring
Safety Policy	4	Keolis is performing well. The Panel attributes this higher level of performance to the structure provided by FRA regulations.	4	MBTA should evaluate adopting FRA standards on the transit side of the operation, where appropriate, to provide guidance the workforce and ensure accepted industry minimum standards are followed.	In-progress
Safety Policy	5	Individuals on the FMCB, individuals in MBTA executive leadership roles and many senior leaders do not have “hands-on” transit operations and safety experience, which are the core functions of the organization.	5a	MBTA must provide direct mentoring and coaching to individuals in executive leadership roles to make them more effective.	In-progress



Safety Policy

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Safety Policy	5	Individuals on the FMCB, individuals in MBTA executive leadership roles and many senior leaders do not have “hands-on” transit operations and safety experience, which are the core functions of the organization.	5b	MBTA must build a leadership team that contains seasoned transit professionals with operations and safety expertise and experience.	Completed & Monitoring
Safety Policy	5	Individuals on the FMCB, individuals in MBTA executive leadership roles and many senior leaders do not have “hands-on” transit operations and safety experience, which are the core functions of the organization.	5c	The FMCB should evaluate adding individuals with operations and safety skillsets to their ranks to provide a more holistic approach to overseeing the MBTA.	Completed & Monitoring
Safety Policy	6	The leadership on the mass transit side of the house, appears to be extremely distracted by preparing for FMCB meetings, which are mandated to occur 36 times a year. This dynamic is clearly affecting the operational and safety performance of the organization.	6	MBTA and FMCB leaders should take measures to reduce the required frequency of Board meetings, i.e. petition the MA. legislature for relief. If this is not feasible, identify other methods of making the meetings less burdensome on senior MBTA staff.	Completed & Monitoring



Safety Risk Management

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Risk Management	1	The CAPs being produced by MBTA transit management are not achieving the level of safety improvement needed at the organization.	1	The agency should formally adopt the recommendations made in this report and track them to closure.	Completed & Monitoring
Safety Risk Management	2	The rapid closure of CAP action items does not provide sufficient time for staff to monitor that these activities are being repetitively performed. In addition, the CAPs are not being sufficiently audited and analyzed to evaluate whether they are effective. CAPs that are not achieving the intended outcomes are not being sent back through the Safety Risk Management process to be re-evaluated and revised.	2a	The Safety department should evaluate recently "closed" CAPs to determine if they were prematurely closed without a sufficient level of verification and auditing.	Completed & Monitoring
Safety Risk Management	2	The rapid closure of CAP action items does not provide sufficient time for staff to monitor that these activities are being repetitively performed. In addition, the CAPs are not being sufficiently audited and analyzed to evaluate whether they are effective. CAPs that are not achieving the intended outcomes are not being sent back through the Safety Risk Management process to be re-evaluated and revised.	2b	Once the analysis described above is completed, determine if any CAPs need to be reopened, revised and reissued.	Completed & Monitoring



Safety Risk Management

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Risk Management	2	<p>The rapid closure of CAP action items does not provide sufficient time for staff to monitor that these activities are being repetitively performed. In addition, the CAPs are not being sufficiently audited and analyzed to evaluate whether they are effective.</p> <p>CAPs that are not achieving the intended outcomes are not being sent back through the Safety Risk Management process to be re-evaluated and revised.</p>	2c	<p>MBTA should evaluate and revise their current CAP procedures to ensure that it:</p> <ul style="list-style-type: none"> • requires data analysis over a sufficient period of time to verify implementation and that required actions are occurring on an ongoing basis • perform data analysis to determine if additional actions are required • audits the results of the mitigation to confirm that the desired results are being achieved • re-evaluate mitigations, if positive results are not achieved • defines the global strategy for addressing the specific risk at the agency • ensures that CAPs are not closed until all elements are satisfied. 	Completed & Monitoring
Safety Risk Management	3	<p>MBTA is insular and does not optimally take advantage of benchmarking opportunities.</p>	3a	<p>MBTA should benchmark their existing practices to include, but be limited to, rule compliance testing programs, employee safety reporting systems, accident investigations, PMIs, QA/QC activities and ROW/RWP training. This can be achieved via peer-to-peer discussions, comparison to FRA regulations and APTA peer reviews as some examples.</p>	Completed & Monitoring



Safety Risk Management

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Risk Management	3	MBTA is insular and does not optimally take advantage of benchmarking opportunities.	3b	MBTA must adopt and implement best practices identified via benchmarking activities.	Completed & Monitoring
Safety Risk Management	4	Contractors performing safety sensitive functions, such as operating work equipment rail vehicles, are not part of Transit's Fatigue Risk Management Program. Keolis lacks an OSA screening program.	4a	MBTA should evaluate requiring contractors, who perform safety sensitive functions such as operating work equipment, to comply with the T's FRMP standards.	In-progress
Safety Risk Management	4	Contractors performing safety sensitive functions, such as operating work equipment rail vehicles, are not part of Transit's Fatigue Risk Management Program. Keolis lacks an OSA screening program.	4b	MBTA must ensure that the OSA screening program and other appropriate measures to combat fatigue on the commuter rail operation are implemented.	Completed & Monitoring
Safety Risk Management	5	Many recent incidents had vehicle and track related defects as causal factors in these events. Therefore, the Panel requested third-party SMEs perform an assessment. There may be other key legacy assets that should be independently evaluated to determine their functionality such as Fire/Life/Safety, Ventilation and Drainage assets.	5a	MBTA management must evaluate and implement as appropriate, the findings of the third-party consultants assessing the Track and Vehicle maintenance areas, with immediate emphasis on QA/QC functions.	Completed & Monitoring



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Safety Risk Management	5	<p>Many recent incidents had vehicle and track related defects as causal factors in these events. Therefore, the Panel requested third-party SMEs perform an assessment.</p> <p>There may be other key legacy assets that should be independently evaluated to determine their functionality such as Fire/Life/Safety, Ventilation and Drainage assets.</p>	5b	MBTA shall ensure that the appropriate level of resources are made available to correct the defects identified by the external SMEs in a timely manner.	In-progress
Safety Risk Management	5	<p>Many recent incidents had vehicle and track related defects as causal factors in these events. Therefore, the Panel requested third-party SMEs perform an assessment.</p> <p>There may be other key legacy assets that should be independently evaluated to determine their functionality such as Fire/Life/Safety, Ventilation and Drainage assets.</p>	5c	MBTA must evaluate if other key legacy asset system need third-party SME inspections, such as Fire/Life/Safety, Ventilation and Drainage assets.	Completed & Monitoring
Safety Risk Management	6	The SRP believes that there is reluctance on the part of vehicle maintenance personnel to continue putting the needed level of resources into maintaining the older fleet of cars, as they are scheduled to be retired in the near future.	6	MBTA must continue to maintain rail cars to agency standards as long as the vehicles are used in passenger service.	Completed & Monitoring



Safety Assurance

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Assurance	1	MBTA operations and safety management do not have a sufficient presence in the field; therefore, they are not adequately monitoring regular operations.	1	MBTA executive management should establish methods to increase opportunities for leadership to spend more time in the field, i.e. "No meetings days", joint management & union audits, performance reviews with managerial engagements with frontline employees as a metric, mandate weekly field time for all managers and supervisors.	Completed & Monitoring
Safety Assurance	2	The current culture of blame and retaliation at the MBTA's transit operation is impeding the T's ability to achieve a greater level of risk management.	2a	MBTA management should evaluate adopting a third party employee safety reporting system, i.e. C3RS or the BTS system.	Completed & Monitoring
Safety Assurance	2	The current culture of blame and retaliation at the MBTA's transit operation is impeding the T's ability to achieve a greater level of risk management.	2b	MBTA management must actively encourage employees to report safety concerns and promote existing and future employee safety reporting systems.	Completed & Monitoring
Safety Assurance	2	The current culture of blame and retaliation at the MBTA's transit operation is impeding the T's ability to achieve a greater level of risk management.	2c	MBTA management must implement mechanisms to provide feedback to employees on actions that have been taking in response to reported safety concerns.	Completed & Monitoring



Safety Assurance

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Assurance	3	The Safety department cannot lead an independent, comprehensive accident investigation due to a lack of Subject Matter Experts. This inadequacy is even more pronounced for events centered around Mechanical & Engineering issues.	3	The Safety department is pursuing resources to address the SME finding. The Safety department must provide executive leadership with periodic updates on this activity (headcount and ZBB issues will be discussed in the Financial recommendation section).	Completed & Monitoring
Safety Assurance	4	Design modifications have occurred without regimented safety certification being conducted. This circumstance is due to the operating departments not involving the Safety department in day-to-day activities.	4	MBTA management must ensure that all management is aware of safety certification requirements. This can be achieved via SMS training, operational bulletins, and "Lessons Learned" bulletins, as some examples.	Completed & Monitoring
Safety Assurance	5	There does not appear to clear lines of supervision for motor-persons. It is not evident that "ride checks" that gauge the caliber of employee's performance is being conducted on motor-persons. This action is especially critical for new motor-persons. Motor-person training should be evaluated to ensure employees fully understand the requirements of their job as well as the consequences of their actions.	5a	MBTA management must establish clear lines of reporting for motor-persons and their immediate supervisors.	Completed & Monitoring



Safety Assurance

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Assurance	5	<p>There does not appear to clear lines of supervision for motor-persons.</p> <p>It is not evident that “ride checks” that gauge the caliber of employee’s performance is being conducted on motor-persons. This action is especially critical for new motor-persons.</p> <p>Motor-person training should be evaluated to ensure employees fully understand the requirements of their job as well as the consequences of their actions.</p>	5b	<p>MBTA management must establish a defined frequency for motor-person read checks and give feedback to employees.</p>	In-progress
Safety Assurance	5	<p>There does not appear to clear lines of supervision for motor-persons.</p> <p>It is not evident that “ride checks” that gauge the caliber of employee’s performance is being conducted on motor-persons. This action is especially critical for new motor-persons.</p> <p>Motor-person training should be evaluated to ensure employees fully understand the requirements of their job as well as the consequences of their actions.</p>	5c	<p>MBTA manage must establish and monitor safety performance and safety performance indicators for this activity.</p>	In-progress



Safety Assurance

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Safety Assurance	5	<p>There does not appear to clear lines of supervision for motor-persons.</p> <p>It is not evident that “ride checks” that gauge the caliber of employee’s performance is being conducted on motor-persons. This action is especially critical for new motor-persons.</p> <p>Motor-person training should be evaluated to ensure employees fully understand the requirements of their job as well as the consequences of their actions.</p>	5d	<p>MBTA management must evaluate the current Motor-person training to ensure employees are adequately trained on their duties and understand the consequences of their actions, such as over-speeding as one example.</p>	In-progress



Safety Promotion

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Promotion	1	The MBTA transit training function is decentralized which creates internal oversight issues regarding assessing the consistency and caliber of the training that is being delivered.	1	MBTA must evaluate centralizing training to ensure consistency and caliber of training being delivered.	In-progress
Safety Promotion	2	The volume of students attending RWP training created time management challenges for the instructor, which resulted in key training areas being glossed over or were not covered at all.	2	Training management must establish and enforce manageable maximum class sizes (issues regarding headcounts and ZBB will be covered in the Financial recommendations below).	Completed & Monitoring
Safety Promotion	3	The instructor wrote the answers to the five questions regarding the bus safety curriculum on the chalkboard for the class to use on the final exam. This act improved the student's odds of passing the course and receiving a ROW certification card. The speed in which critical material was covered raises concerns that novices to the transit industry may not have absorbed enough working knowledge to recognize a ROW procedural error or that they will have the confidence to invoke a Good Faith Challenge.	3	MBTA Training management should routinely audit training classes to be aware of and identify these types of deviations in training protocols and develop CAPs to address.	In-progress



Safety Promotion

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Promotion	4	Training manuals are printed in Black and White; however, the different colored flags in the curriculum are not labeled by color.	4	MBTA must either resume printing color training manuals or update the current manuals to provide color coded labeling where applicable.	Completed & Monitoring
Safety Promotion	5	There does not appear to be clearly defined PPE standards that are understood across the organization.	5a	MBTA needs to define their minimum standards for ROW PPE, communicate the standards to the workforce and enforce them.	Completed & Monitoring
Safety Promotion	5	There does not appear to be clearly defined PPE standards that are understood across the organization.	5b	MBTA needs to perform a critical assessment of employee safety needs beyond ROW PPE, i.e. harnesses for fall protection, PPE for Hot Work, as some examples.	In-progress
Safety Promotion	6	While the MBTA is making progress in implementing SMS, there is clearly a need for further improvement in the many areas described throughout this report.	6a	MBTA must conduct an organization-wide SMS gap analysis to determine the agency's current SMS maturity level.	Completed & Monitoring
Safety Promotion	6	While the MBTA is making progress in implementing SMS, there is clearly a need for further improvement in the many areas described throughout this report.	6b	The SMS gap analysis of the Safety department should receive priority as they are instrumental in the implementation of the agency's SMS program.	Completed & Monitoring



Financial Review

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Financial Review	1	The FMCB strategic plan is overly focused on delivering the Capital budget. While the plan mentions that “asset management and life-cycle maintenance are the keys to ensuring that the MBTA’s asset never again fall into disrepair”, there are no metrics measuring the performance of preventative maintenance.	1	FMCB must require MBTA leadership to provide and publicly report on KPIs associated with PMIs and the performance of required maintenance of legacy system assets to keep them fully functional.	In-progress
Financial Review	2	Deep budget reductions have resulted in the lack of resources in critical areas, which may be affecting the safe delivery of services. The reductions appear to have occurred as a totally top down approach without a critical or clear assessment of functions or needs.	2a	MBTA must perform a ZBB analysis of each department to identify the appropriate level of resources needed to ensure the safe delivery of service and support core business functions.	On-hold



Financial Review

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Financial Review	2	Deep budget reductions have resulted in the lack of resources in critical areas, which may be affecting the safe delivery of services. The reductions appear to have occurred as a totally top down approach without a critical or clear assessment of functions or needs.	2b	MBTA must avoid a top down approach to conducting the ZBB and have an inclusive dialogue with those directly impacted by these decisions.	On-hold
Financial Review	3	A key priority of the FMCB has been acceleration of capital delivery. This is a major initiative that has a significant impact upon the operating budget. There is widespread concern about the resource focus on capital delivery is occurring at the expense of the operating needs.	3	MBTA must re-examine the financial process to provide efficiencies and flexibility to address the needs of daily operations and the capital spending.	On-hold



Safety Culture

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Culture	1	The agency has not performed well in terms of leading for safety or in utilizing its internal talent to set a firm foundation to guide the organization's path for safety. There is a lack of clarity and alignment around safety leadership.	1a	MBTA must be intentional about the culture they want to establish and start by defining the organization's vision, mission, values, strategies and associated behaviors.	Completed & Monitoring
Safety Culture	1	The agency has not performed well in terms of leading for safety or in utilizing its internal talent to set a firm foundation to guide the organization's path for safety. There is a lack of clarity and alignment around safety leadership.	1b	MBTA must update managerial job descriptions to include performance criteria to create ownership and accountability for driving a culture of safety.	In-progress
Safety Culture	1	The agency has not performed well in terms of leading for safety or in utilizing its internal talent to set a firm foundation to guide the organization's path for safety. There is a lack of clarity and alignment around safety leadership.	1c	MBTA must create a feedback loop for discussing performance around safety.	Completed & Monitoring
Safety Culture	1	The agency has not performed well in terms of leading for safety or in utilizing its internal talent to set a firm foundation to guide the organization's path for safety. There is a lack of clarity and alignment around safety leadership.	1d	MBTA must define leadership safety involvement and expectations.	Completed & Monitoring



Safety Culture

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Culture	1	The agency has not performed well in terms of leading for safety or in utilizing its internal talent to set a firm foundation to guide the organization's path for safety. There is a lack of clarity and alignment around safety leadership.	1e	MBTA must hold monthly Executive Safety meetings at the executive level and cascade information down through the organization.	Completed & Monitoring
Safety Culture	2	The absence of trust and respect, insufficient communications, an increased silo mentality resulting in poor teamwork, coupled with inadequately trained leaders are at the core of the T's poor safety performance and low morale. Managers and supervisors need to improve basic leadership skills. Leaders do not spend enough time in the field engaging with frontline personnel. And when they do, they exhibit poor listening and feedback skills.	2a	MBTA must utilize its affiliation with Roxbury Community College to train managers to its fullest.	In-progress
Safety Culture	2	The absence of trust and respect, insufficient communications, an increased silo mentality resulting in poor teamwork, coupled with inadequately trained leaders are at the core of the T's poor safety performance and low morale. Managers and supervisors need to improve basic leadership skills. Leaders do not spend enough time in the field engaging with frontline personnel. And when they do, they exhibit poor listening and feedback skills.	2b	Establish feedback mechanisms that help leaders learn effective communication skills. Provide one on one and/or team coaching to guide leaders.	In-progress



Safety Culture

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Culture	3	From senior management to the frontline—the agency has created a silo mentality and does not seek or share information to achieve its goals.	3	MBTA needs to create cross-functional teams with specific goals to achieve strategic plans and breakdown siloes.	Completed & Monitoring
Safety Culture	4	There is not an adequate onboarding process from both the organizational and departmental level.	4a	MBTA must benchmark its onboarding process against other transit agencies.	Completed & Monitoring
Safety Culture	4	There is not an adequate onboarding process from both the organizational and departmental level.	4b	MBTA must create an onboarding program for both operating and support functions. The onboarding process should include safety information that will guide new hire understanding of safety as a value by clarifying its importance in every aspect of MBTA business.	Completed & Monitoring
Safety Culture	4	There is not an adequate onboarding process from both the organizational and departmental level.	4c	Organize and encourage site visits in the first 100 days to help new hires gain a better understanding of how the T works together to achieve its mission.	On-hold



Safety Culture

Recommendation Category	Finding Number	SRP Finding	Recommendation Number	SRP Recommendation	Status
Safety Culture	5	The MBTA lacks formal organization charts.	5	MBTA needs to build and continuously update organization charts to help employees learn who, what and how the organization achieves its daily mission.	Completed & Monitoring
Safety Culture	6	The agency lacks a multi- vehicle approach to communicating with employees.	6a	MBTA must look at and implement a diverse strategies to communicate with its employees to build “esprit de corps”.	Completed & Monitoring
Safety Culture	6	The agency lacks a multi- vehicle approach to communicating with employees.	6b	MBTA should create events that make employees feel appreciated and valued.	Completed & Monitoring
Safety Culture	7	There is no incentive to become a manager since an employee can earn substantially more than his/her supervisor by working overtime.	7	MBTA must conduct an equity analysis to attract and retain quality management and non-operations personnel, such as Safety Officers.	Completed & Monitoring
Safety Culture	8	The MBTA is at a critical junction in its history. The Chairman, FMCB and the GM have all acknowledged that the culture of the T must change to meet the needs of its riding public and the employees who move the system. Establishing a culture of safety is not an option, rather, it has become a necessity.	8	MBTA should evaluate inviting the SRP back after a period of time has elapsed to gauge the progress of implementing these recommendations.	Completed & Monitoring

