



Massachusetts Bay Transportation Authority

FTA SMI Special Directives Update: Early June Directives & Final SMI Report

MBTA Chief Safety Officer Ronald Ester

MBTA Quality, Compliance, and Oversight Chief Katie Choe

September 29, 2022



FTA Early Special Directives Update

Four Special Directives issued June 15, 2022

MBTA Chief Safety Officer Ronald Ester



June 15 (Early) Special Directives

Track Maintenance- 22-04

- Nine (9) Corrective Action Plans were developed and submitted to the FTA for review, July 15, 2022.
- On **August 10**, FTA completed their review, approving all nine (9) Corrective Action Plans.

Vehicle Securement of Disabled Trains- 22-05

- Three (3) Corrective Action Plans were developed and submitted to the FTA for review, June 30, 2022.
- On August 3, FTA completed their review of the CAPs and requested additional edits to incorporate additional actions.
- MBTA revised the three (3) Corrective Actions Plans and resubmitted to the FTA. The resubmitted CAPs were approved on **August 26th**

Operations Control Center- 22-06

- Seven (7) Correction Action Plans were developed and submitted to the FTA for review, July 5, 2022
- On August 5, MBTA submitted a revised Staffing Analysis. August 10, supporting information on CAP milestones was submitted. The CAPs were approved on **August 26th**

Lapsed Certifications- 22-07

- Three (3) Corrective Action Plans were submitted to the FTA for review, July 20, 2022.
- On **August 8**, FTA completed their review, approving both CAPs.



FTA SMI On-Site Verification Dates



FEDERAL TRANSIT ADMINISTRATION

- ✓ Confirmed September 19 – 23
- Pending October 17 – 21 (Validate Track Work)
- Pending November 14 – 18
- Pending December 5 – 9



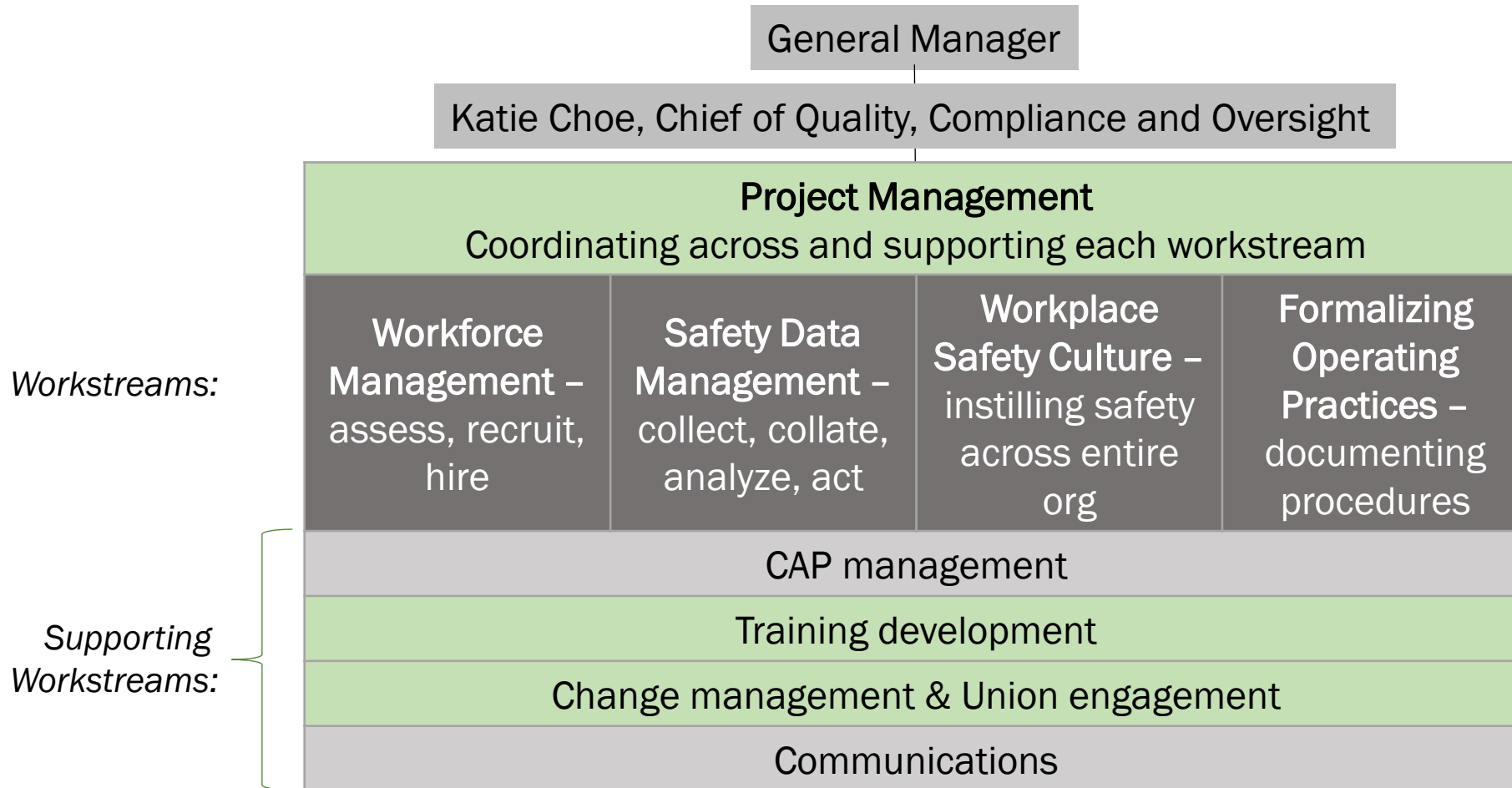
FTA Final SMI Report: Organizational & Directives Updates

Four Special Directives issued, August 31, 2022.

MBTA Quality, Compliance, and Oversight Chief Katie Choe



New Office of Quality, Compliance & Oversight

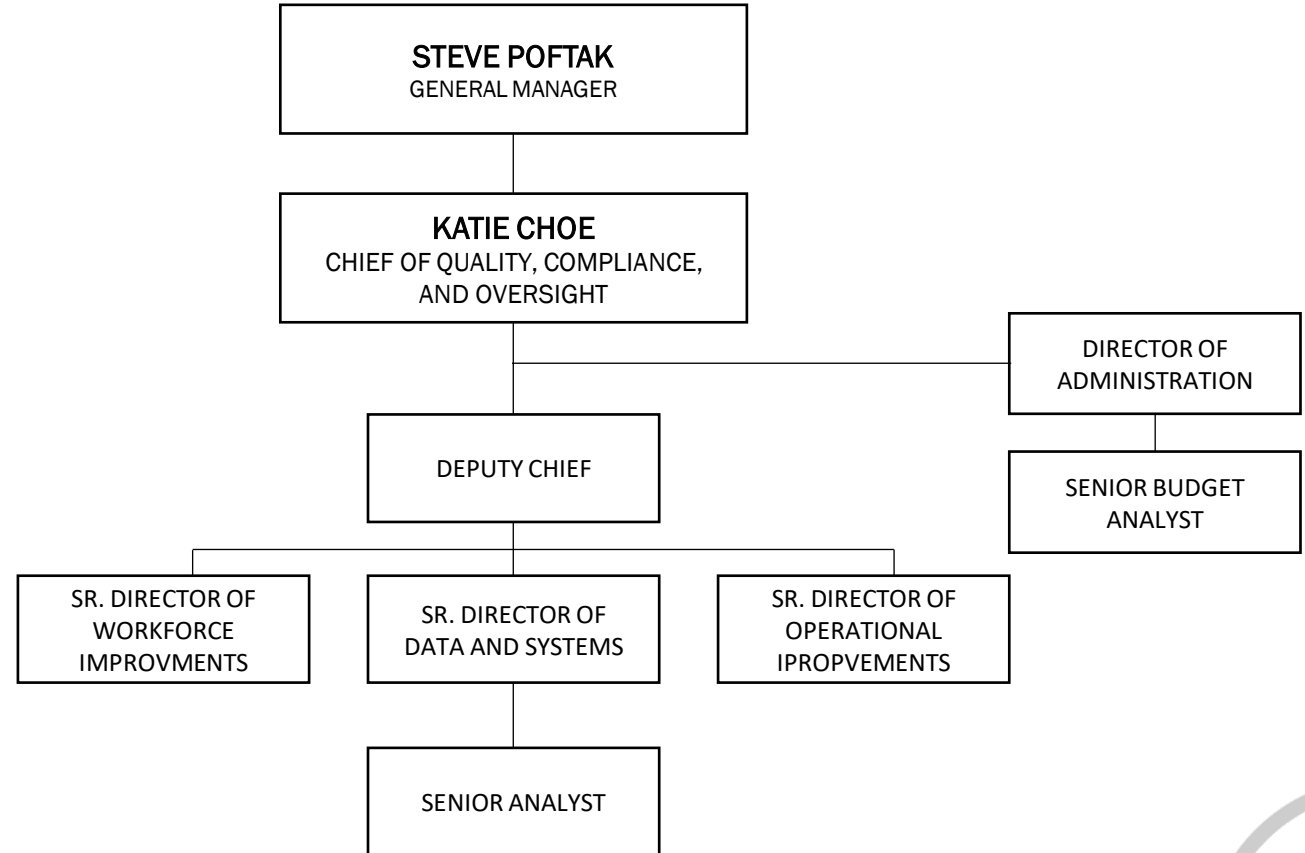


This office will be receiving resources – including additional staff, funding, and consultant support...



Standing Up the Office of Quality, Compliance and Oversight

- Budget for the office has been established, enabling hiring and procurements.
- Staffing RFP for Project Management Office (PMO) published on 9/15. Proposals due 10/6.
- Internal positions are going through review and approval process.
- Interim staff in place.



FTA SMI Summary of Findings

August 31, 2022

4 SPECIAL DIRECTIVES — **20** FINDINGS — **53** ACTIONS — **4** CAPs DEADLINES



FTA SMI 08.31.22 – Summary of Findings

#22-9: Managing the impact of operations, maintenance & capital projects requirements on the existing workforce.

4 findings requiring additional assessment and resource prioritization for operations and maintenance activities.

CAPs due in 30 days (by Sep 30)

#22-10: Prioritization of Safety Management Information.

6 findings requiring enhanced and expedited implementation of the Agency's SMS, including the development of procedures, safety management training, safety risk assessment, and safety assurance activities.

CAPs due in 45 days (by Oct 15)

#22-11: Effectiveness of Safety Communication.

3 findings requiring improvements in the MBTA's management of its safety committee process, employee safety reporting program, and safety promotion activities.

CAPs due in 20 days (Sep 20)

SUBMITTED

#22-12: Operating conditions and policies, procedures, and training.

7 findings requiring additional monitoring of rail transit operations, new Quality Assurance/Quality Control capabilities, and new training and procedures.

CAPs due in 35 days (by Oct 5)



Special Directive 22-11: Effectiveness of Safety Communication

Three Corrective Action Plans Submitted to FTA on September 20, 2022

Submitted On-Time for 9/20 Deadline

- **Finding 1:** MBTA has not established explicit and formal provisions to ensure safety information from safety committee results in a consistent outcome of documented, prioritized, and actionable safety information.
 - **Corrective Action Plan Summary:** MBTA will review of the existing safety meeting structure and develop the procedures to ensure that the meetings are consistent in the identification and analyses of safety concerns and hazards; prioritization of safety risks; implementation of corrective actions; and safety risk mitigation effectiveness monitoring.
- **Finding 2:** MBTA has not documented explicit and formal provisions to ensure the participation of frontline employees in local safety committees as part of their job responsibilities in relation to the agency's SMS.
 - **Corrective Action Plan Summary:** MBTA will define the expected role and contribution of frontline employees to the committee meetings, develop guidelines for participation, and ensure explicit department accountabilities for meeting outcome, information capture, communication, and follow-up.
- **Finding 3:** MBTA management has not effectively communicated clear direction to frontline employees on what to report and what not to report through the Safety Hotline.
 - **Corrective Action Plan Summary:** MBTA will evaluate existing Safety Hotline effectiveness, and evaluate and revise the training to ensure frontline employees are knowledgeable about its appropriate use. Non-safety reports to the ESRP will be reviewed for root cause and recommendations for alternative reporting programs will be made.



Special Directive 22-9: Managing the Impact of Operations, Maintenance, and Capital Project Requirements on the Existing Workforce

Four Corrective Action Plans Due to FTA on September 30, 2022

Submission Schedule On-Time

- **Finding 1:** MBTA's staffing levels are not commensurate with the demand for human resources required to carry out current rail transit operations and maintenance in addition to expanding capital program activities.
 - **Corrective Action Plan Summary:** MBTA will conduct a Workforce Assessment that determines necessary staffing levels to provide safe, reliable, and best-in-class service.
- **Finding 2:** MBTA has not demonstrated the organizational capacity to recruit and hire personnel to meet authorized staffing levels.
 - **Corrective Action Plan Summary:** Taking the results off the workforce assessment, MBTA will develop a five-year recruitment, retention, and hiring plan.
- **Finding 3:** Additional resources are needed to support MBTA's safety engineering and safety certification process for capital projects.
 - **Corrective Action Plan Summary:** MBTA will review and revise its safety engineering and certification processes. Resources to support the revised processes will be identified and incorporated into the workforce assessment and hiring plan.
- **Finding 4:** MBTA requires additional oversight of contractor work sites.
 - **Corrective Action Plan Summary:** MBTA will evaluate and define the role of Safety, Operations, and Capital on contractor oversight, define clear responsibilities for inspection and resident engineering, and incorporate the results into the workforce assessment and hiring plan.



Questions?



Appendix – Details of Final SMI Findings



FTA SMI 08.31.22 – Summary of Findings

#22-9: Managing the impact of operations, maintenance & capital projects requirements on the existing workforce.

- **Finding 1:** MBTA's staffing levels are not commensurate with the demand for human resources required to carry out current rail transit operations and maintenance in addition to expanding capital program activities.
- **Finding 2:** MBTA has not demonstrated the organizational capacity to recruit and hire personnel to meet authorized staffing levels.
- **Finding 3:** Additional resources are needed to support MBTA's safety engineering and safety certification process for capital projects.
- **Finding 4:** MBTA requires additional oversight of contractor work sites.

#22-10: Prioritization of Safety Management Information.

- **Finding 1:** MBTA has not ensured that the necessary structures are in place to support effective implementation and operation of its SMS
- **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.
- **Finding 4:** MBTA's safety investigations and safety assurance activities do not consistently collect and analyze information on precursor factors.
- **Finding 5:** MBTA's safety risk assessment guidance as part of its Safety Risk Management is ambiguous and has led to confusion among stakeholders regarding their responsibilities and authorities, which has created delays in carrying out safety risk assessments activities.
- **Finding 6:** MBTA safety information management tools (hazard log, safety risk mitigation log, etc.) do not fully support prioritization of resources to address safety risk and safety performance monitoring.



FTA SMI 08.31.22 – Summary of Findings

22-11: Effectiveness of Safety Communication.

- **Finding 1:** MBTA has not established explicit and formal provisions to ensure safety information from safety committee results in a consistent outcome of documented, prioritized, and actionable safety information.
- **Finding 2:** MBTA has not documented explicit and formal provisions to ensure the participation of frontline employees in local safety committees as part of their job responsibilities in relation to the agency's SMS.
- **Finding 3:** MBTA management has not effectively communicated clear direction to frontline employees on what to report and what not to report through the Safety Hotline.

#22-12: Operating conditions and policies, procedures, and training.

- **Finding 1:** Documented operating and maintenance rules and procedures are not implemented as required.
- **Finding 2:** MBTA does not monitor operations, including the conditions of the operating environment, to identify the reasons for deviations between formal, established standards, rules and procedures, and actual operations and maintenance practices.
- **Finding 3:** MBTA's QA/QC program is not sufficiently independent from the activities it oversees.
- **Finding 4:** Technical training for operations and maintenance departments is under-resourced and decentralized, without sufficient resources and direction, and relies significantly on on-the-job-training (OJT) which is informal and lacks oversight. Emergency response training is poorly integrated into overall training program.
- **Finding 5:** MBTA lacks formal resource manuals in key maintenance areas and does not currently provide employees with checklists or other tools to support training and implementation of maintenance rules and procedures.
- **Finding 6:** Due to workforce turnover, MBTA's new motorpersons and officials no longer have access to mentoring from experienced motorpersons and officials (inspectors, chief inspectors, and supervisors).
- **Finding 7:** Radio quality is deficient in several key locations and does not support adequate communications between OCC and field employees to ensure the safety of MBTA operations and maintenance.