

FTA Final SMI Report: Directives Updates

Four Special Directives issued, August 31, 2022.

MBTA Quality, Compliance, and Oversight Chief Katie Choe



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 O&M activities.

**CAPs due in 30 days
(by Sep 30)**

SUBMITTED

Revisions due 1/3

#22-10: Prioritization of Safety Management Information.

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

**CAPs due in 45 days
(by Oct 15)**

SUBMITTED

Revisions due 1/3

#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.

ALL CAPS APPROVED

#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)**

SUBMITTED

Revisions due 1/3

Corrective Action Plan Status

SMI Finding	Corrective Action Plan	Status
22-9 Finding 1	Workforce Assessment	Resubmission required
22-9 Finding 2	Hiring Plan	Resubmission required
22-9 Finding 3	Safety Certification	Resubmission required
22-9 Finding 4	Contractor Oversight	Approved
22-10 Finding 1	SMS Implementation	Resubmission required
22-10 Finding 2	Safety Information	Resubmission required
22-10 Finding 3	Data Prioritization	Resubmission required
22-10 Finding 4	Precursor Factors	Resubmission required
22-10 Finding 5	Risk Assessment	Resubmission required
22-10 Finding 6	Risk & Performance Monitoring	Resubmission required

SMI Finding	Corrective Action Plan	Status
22-11 Finding 1	Safety Committee Meetings	Approved
22-11 Finding 2	Frontline Participation	Approved
22-11 Finding 3	ESRP/Safety Hotline	Approved
22-12 Finding 1	Rules Compliance	Resubmission required
22-12 Finding 2	Operating Conditions	Resubmission required
22-12 Finding 3	QA/QC	Resubmission required
22-12 Finding 4	Training	Approved
22-12 Finding 5	Manuals	Approved
22-12 Finding 6	Mentoring	Approved
22-12 Finding 7	Radio System	Approved



FTA Feedback

- General
 - Update Governing Committee Naming Conventions
 - Provide a Project Management Plan for the Quality, Compliance & Oversight Office
 - Provide access to the integrated master schedule
- Quality Management (SD 22-12 Finding 3)
 - Clarify whether the Quality Management Plan includes Quality Assurance Procedures
 - Clarify whether calling out the Quality Management internal audit program for Vehicle Engineering was redundant to the Quality Management Plan
 - Clarify whether the Quality Management internal audit program will cover all maintenance activities or only those deemed safety-critical as well as the role of the Safety Department in auditing the Quality Department
 - Clarify the procedural development and configuration process for the new Document Management System as well as the controls for document revisions



Upcoming Deadlines

Special Directive	Finding	Actionable Item	Deadline
22-12	Finding 7	Verification – Testing the Weak Spots	December 5 
22-12	Finding 1	Create Department-Specific Rules Compliance Working Groups	December 15 
22-9	Finding 3	Procure Consulting Services	December 19
22-12	Findings 1, 2	Procure Consulting Services	December 20
22-10	ALL	Procure Consulting Services	December 22
22-9	Finding 4	Procure Consulting Services	December 31
22-10	Finding 6	Revise and Distribute Safety Plan	December 31
22-11	Findings 1, 2	Revise and distribute transit safety plan	December 31
22-12	Finding 3	Establish monthly GM briefing	December 31
22-12	Finding 3	Finalize Quality Management Plan	December 31
22-12	Finding 5	Update the E&M PM&I Framework	December 31



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.