



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA 22-11-MBTA-
CAT3.01

BACKGROUND

Overview: FTA issues Special Directive 22-11 to require the Massachusetts Bay Transportation Authority (MBTA) to address findings documented in FTA's Safety Management Inspection (SMI) report released on August 31, 2022. Conducted between April 14 and June 30, 2022, FTA's SMI reviewed the MBTA rail transit system management, operations, and maintenance programs. This Special Directive identifies three findings requiring action that the MBTA must take to improve MBTA's management of its safety committee process, employee safety reporting program, and safety promotion activities.

PURPOSE

This Corrective Action Plan has been developed to address **Special Directive No. 22-11, Category 3: Effectiveness of Safety Communication**

FTA Finding

Effectiveness of Safety Communication

1. 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.

FTA Required Action

- 1.A: MBTA must develop and describe, in the organization's SMS documentation, instructions regarding the conduct, recording, communication and follow up of the outcome consensus decisions specific for each of the following meetings - taking into consideration the nature (strategic or tactical) of each meeting:
 - Operations and Safety Biweekly call (currently every other Friday)
 - Operations and Safety weekly meeting (currently on Wednesdays)
 - Executive Safety Committee (ESC)
 - Safety Management Review Committee (SMRC)
 - Safety Management Working Groups (SMWGs)
 - Data Analysis Group (DAG)
 - Local Safety Committee Meetings
 - Joint Labor/Management Safety Committee (required by Bipartisan Infrastructure Law)
- 1.B: In support of the above, MBTA must develop and describe, in the organization's SMS documentation, a formal mechanism and associated guidelines 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.

ANALYSIS AND RECOMMENDATIONS

Analysis

- MBTA has identified existing documentation and process flows for tracking and monitoring of actionable items from the above-listed meetings, including consensus decisions made by each group.
- MBTA has established provisions for identification and analysis of hazards, prioritization of safety risks, implementation of corrective actions, and safety risk mitigation monitoring, but these processes have not been consistently implemented at all meeting levels or integrated across meeting levels.



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Recommendations

- MBTA will review the agency's existing framework for conducting and documenting safety-related meetings, including the underlying strategic or tactical nature of each meeting, and implement a standardized methodology for consensus decision-making, documentation, tracking, and follow-up.
- MBTA will review the agency's existing framework for conducting and documenting safety-related meetings, establish consistent requirements for identification and analyses of safety concerns and hazards, prioritization of safety risks, implementation of corrective actions, and safety risk mitigation effectiveness monitoring, and implement tools to support these activities.

ACTION PLAN

Description: MBTA will onboard a consulting firm to assist with a comprehensive review of the existing safety meeting structure and develop explicit and formal provisions to ensure safety information and communication from safety committees results in a consistent outcome of documented, prioritized, and actionable safety information. MBTA will utilize the consultant to develop the mechanism and guidelines 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. The mechanism and guidelines will be incorporated into the SMS documentation.

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
1.A	Procure Consulting Services	Issue RFP or Task Order for consulting services to evaluate the safety meeting structure, develop instructions for the meetings, develop guidelines for the meeting content and outcomes, and how to incorporate the results into the SMS documentation.	QCOO: Katie Choe Safety: Mike Catsos	9/21/22	11/20/22
1.B	Implement Interim Action Plans	Carry out interim action steps outlined in 22-11 CAP resubmittal memorandum.	QCOO: Katie Choe Safety: Mike Catsos	10/28/22	12/31/22
2	Onboard Consultant	Onboard selected consultant.	QCOO: Katie Choe	11/21/22	2/20/23
3	Assess Existing Tools and Processes for Action Items	Compile and review all existing tools and processes used to document, track, and carry out action items from safety-related meetings.	QCOO: Katie Choe Safety: Mike Catsos	2/21/23	3/20/23
4	Assess Existing Tools and Processes for Risk Assessment and Mitigation	Compile and review all existing tools and processes used to perform hazard identification, safety risk assessment, corrective action planning, and risk mitigation monitoring during staff and management safety meetings.	QCOO: Katie Choe Safety: Mike Catsos	2/21/23	3/20/23
5	Tools and Processes Gap Analysis	Identify gaps in the existing tools and processes used to document, track, and carry out action items from the safety-related meetings and tools and processes used to perform hazard identification, safety risk assessment, corrective action planning, and risk mitigation monitoring during safety meetings. Analyze variations in use of	QCOO: Katie Choe Safety: Mike Catsos	QCOO: Katie Choe Safety: Mike Catsos	4/20/23

¹ In the event of personnel or departmental changes, responsibilities for actionable items shall transfer to the new leadership.

² Est Start – Estimated Start Date

³ Est End Estimated Completion Date



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		existing tools and processes and reasons for variation.			
6	Assess Existing Meeting Framework	Perform, with the assistance of a stakeholder group, a comprehensive review of the existing safety meeting structure, including meeting schedules, sequences, and attendees. Also assess the strategic and/or tactical purpose of each meeting, and each meeting's suitability for supporting safety program implementation given current agenda topics and thematic content.	QCOO: Katie Choe Safety: Mike Catsos	4/21/23	5/20/23
7	Best Practices Review of Safety Meetings	Complete a best practice review of safety meeting structure and procedures.	QCOO: Katie Choe Safety: Mike Catsos	4/21/23	5/20/23
8	Safety Meetings Gap Analysis and Updated Structure Proposal	Identify existing gaps in the meeting framework's ability to support key SMS processes and demonstrated accountability of the Safety Department representative to document or report out the information discussed during the meetings while also defining requirement for employee safety concerns to be documented or acted upon by supervisors.	QCOO: Katie Choe Safety: Mike Catsos Operations: Erik Stoothoff	5/21/23	6/20/23
9	Stakeholder Engagement	Convene stakeholder group from all affected areas including frontline employees and get concurrence on any proposed safety meeting structure changes. Modify proposed structure if required based on areas of stakeholder feedback.	Safety: Ron Ester Labor Relations: Ahmad Barnes	6/21/23	7/20/23
10	Establish Meeting Charters	Document and distribute to meeting stakeholders explicit meeting charters identifying the strategic and/or tactical nature of each meeting, goals and objectives for each management or staff working group, participants, and relationships with other safety meetings and processes.	QCOO: Katie Choe Safety: Ron Ester Operations: Erik Stoothoff	7/21/23	8/20/23
11	Establish Unified Documentation Process	Establish uniform instructions for the conduct of meetings, including explicit departmental accountabilities for information capture and follow-up, as well as templates for meeting agenda development, meeting minutes, escalation and feedback procedures, and tracking of actionable items.	QCOO: Katie Choe Safety: Mike Catsos	8/21/23	10/20/23
12	Establish Guidelines for Meetings	Establish a mechanism and associated guidelines 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. Guidelines should include escalation and feedback procedures. Required Action 1E	QCOO: Katie Choe Safety: Mike Catsos	8/21/23	10/20/23
13	Identify and Train Facilitators	Identify permanent facilitators to monitor and support the performance of each safety meeting, define facilitators' role, and train these individuals in implementing the meeting procedures.	Operations: Erik Stoothoff Safety: Mike Catsos	10/21/23	11/20/23


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14	Implement Unified Documentation Process	Implement the system for documenting and tracking meeting action items with the support of facilitators and monitor implementation of this process to ensure all frontline and management meetings are properly documented and retained via a uniform and accessible document management system. Required Action 1A	Operations: Erik Stoothoff Safety: Mike Catsos	11/21/23	12/20/23
15.A	Revise and Distribute Transit Safety Plan	Revise the Transit Safety Plan to reflect near term expectations for safety meeting structure, procedures, and recordkeeping requirements in accordance with 22-11 CAP resubmittal memorandum.	Safety: Ron Ester	10/1/22	12/31/22
15.B	Revise and Distribute Transit Safety Plan	Revise the Transit Safety Plan to reflect long term modifications to the safety meeting structure, procedures, and recordkeeping requirements.	Safety: Ron Ester	6/1/23	9/1/23
16	CAP Verification	Evaluate actionable items/deliverables before submission to FTA to confirm there is reasonable evidence that the findings and these required actions have been resolved, taking into account the scope and performance measures.	QCOO: Katie Choe Safety: Ron Ester	ongoing	



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COMPLETION DOCUMENTATION

Performance Metrics

- Standard templates for meeting agendas, minutes, and action items covering all safety committees
- Meeting agenda will incorporate a roster of attendees with a specific section highlighting attendance of frontline employees
- Track employee safety concerns and actions taken to resolve
- Meeting charters developed for all safety committees
- Transit Safety Plan updated
- Hazard reports, safety risk assessments, corrective action plans, and safety risk monitoring results generated from safety meetings

Verification

- Verification for ensuring completion of the required activities will include:
 - Confirm adherence to required standards for meeting charters and templates
 - Confirmation that hazard reports, safety risk assessments, corrective action plans, and safety risk monitoring results are generated from safety meetings and reviewed by management
 - Confirm frontline employees are having their concerns tracked and addressed

BUDGET/COST ESTIMATE

Overview: Some costs may vary for this CAP depending on department- or enterprise-wide implementation of new tracking tools, if agreed to be the most appropriate solution by Safety and Executive Leadership in consultation with MBTA's consultant.

Segment Code	Cost Estimate (\$)
Consultant Engagement	1,200,000
Documentation System	20,000
10 FTE for facilitation & documentation	1,000,000
Document Control Manager (Safety Department)	100,000
Total	2,320,000



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CORRECTIVE ACTION PLAN COMMITMENT

Responsible Parties

Department⁴	Name	E-mail	Signature
Safety	Michael Catsos <i>Deputy Director of Safety Assurance</i>	[REDACTED]	DocuSigned by: 17975C038873466...
Operations	Erik Stoothoff <i>Acting Chief Operating Officer</i>	[REDACTED]	DocuSigned by: 420D862BD86D47B...
Labor Relations	Ahmad Barnes <i>Sr Director of Labor Relations</i>	[REDACTED]	DocuSigned by: 06923AF9EBBE462...
Human Resources	Tom Waye <i>Chief Human Resources Officer</i>	[REDACTED]	DocuSigned by: 3F02AECAC6884B1...
Finance	Mary Ann O'Hara <i>Chief Financial Officer</i>	[REDACTED]	DocuSigned by: AAB14BE2F99B419...
Customer Experience	Danny Levy <i>Chief Customer Experience Officer</i>	[REDACTED]	DocuSigned by: 0604519228034CF...
Information Technology	John Glennon <i>Chief Information Officer</i>	[REDACTED]	DocuSigned by: C8238EF50D624B0...
Procurement	Jeff Cook <i>Chief Procurement & Contract Administration Officer</i>	[REDACTED]	

⁴ Offices designated as supporting roles provide subject matter expertise to responsible parties during action development and are not directly responsible for delivery of actionable items listed above.



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Executive Leadership of Responsible Parties

DocuSigned by: <i>Jeffrey D. Gonneville</i> 2BF466B94125C441 Jeffrey D. Gonneville MBTA Deputy General Manager	12/29/2022
	Date

DocuSigned by: <i>David Panagore</i> 1816C9A5EC502457 David Panagore MBTA Chief Administrative Officer	December 21, 2022
	Date

DocuSigned by: <i>Katie J. Choe</i> 93244C3E24 Katie J. Choe MBTA Chief of Quality, Compliance & Oversight	December 22, 2022
	Date

DocuSigned by: <i>Ronald Ester</i> 30C25B09E237430 Ronald Ester MBTA Chief Safety Officer	12/30/2022
	Date

DocuSigned by: <i>Steve Poffak</i> 88BCD9C4481D4D5... Steve Poffak MBTA General Manager	December 19, 2022
	Date