



## The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA 22-11-MBTA-  
CAT3-2

### 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**

- 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.

#### *FTA Required Action*

- 2.A: MBTA must develop explicit and formal guidelines for the expected role and contribution of frontline employees to the local safety committee meetings.
- 2.B: MBTA must develop instructions for the conduct of the meetings, including explicit departmental accountabilities for meeting outcome information capture, communication and follow up.

### ANALYSIS AND RECOMMENDATIONS

#### *Analysis*

- MBTA has established guidance for employee participants in local safety committee meetings, but must expand and further promote this guidance, review the existing meeting structure to establish consistency in expectations, and clarify job responsibilities.

#### *Recommendations*

- MBTA will review and modify job responsibilities and guidelines related to local safety committee participation and will monitor the local safety committee meeting structure to ensure consistent implementation.

### ACTION PLAN

**Description:** MBTA will define the expected role and contribution of frontline employees to the local safety committee meetings, develop explicit and formal guidelines for those roles, and develop instructions for the conduct of safety meetings including frontline employees that include explicit department accountabilities for meeting outcome information capture, communication, and follow-up.



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### PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party <sup>1</sup>	Est Start <sup>2</sup>	Est End <sup>3</sup>
1.A	Procure Consulting Services	Develop and execute an RFP for a consultant to develop explicit and formal guidelines for the expected role and contribution of frontline employees to the local safety committee meetings, and instruction for the conduct of the meetings including explicit departmental accountabilities for meeting outcome capture, communication and follow-up. (In conjunction with Finding 1 CAP.)	QCOO: Katie Choe Safety: Michael 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	Establish Unified Meeting Process	Based on the assessment of existing tracking tools and the meeting framework visioning process, establish formal guidelines for the expected role and contribution of frontline employees in safety meetings and establish uniform instructions for the conduct of meetings, including explicit departmental accountabilities for information capture and follow-up. <b>Required Action 2.A</b>	QCOO: Katie Choe Safety: Michael Catsos	5/21/23	6/20/23
4	Update Training Materials	Review and update existing training related to frontline worker meeting participation and expectations and assign updated training to frontline employees. <b>Required Action 2B</b>	QCOO: Katie Choe Operations: Jeff Gonville HR: Tom Waye Labor Relations: Ahmad Barnes	6/21/23	8/20/23
5	Implement Unified Documentation Process	Implement the new 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 control system.	Operations: Erik Stoothoff Safety: Ron Ester QCOO: Katie Choe	6/21/23	7/20/23
6	Review Job Descriptions	Review job descriptions for frontline employees to ensure that safety meeting participation is explicitly identified as a component of employee duties.	HR: Tom Waye Operations: Jeff Gonville	7/21/23	10/20/23
7	Promote Local Safety Committee Participation	Work closely with Labor Relations and Unions to develop and distribute promotional materials related to the safety meeting process, including the benefits of participation and case studies highlighting impacts on the safety program.	CX: Danny Levy Safety: Michael Catsos Labor Relations: Ahmad Barnes	8/21/23	10/20/23
8.A	Revise Transit Safety Plan	Revise the Transit Safety Plan to reflect near term expectations for safety meeting	Safety: Michael Catsos	10/1/22	12/31/22

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

<sup>2</sup> Est Start – Estimated Start Date

<sup>3</sup> Est End Estimated Completion Date


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**PLAN STRUCTURE**

#	Actionable Items	Description	Responsible Party <sup>1</sup>	Est Start <sup>2</sup>	Est End <sup>3</sup>
		structure, procedures, and recordkeeping requirements in accordance with 22-11 CAP resubmittal memorandum.			
<b>8.B</b>	Revise Transit Safety Plan	Revise the Transit Safety Plan to reflect long term modifications to the safety meeting structure, procedures, and recordkeeping requirements.	Safety: Michael Catsos	6/1/23	9/1/23
<b>9</b>	CAP Verification	MBTA departments will evaluate actionable items/deliverables before submission to FTA to confirm there is reasonable evidence that the findings and this required action 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

- Guidelines for role and contribution of frontline employees in safety meetings
- Standard templates for meeting agendas, minutes, and action items
- Transit Safety Plan updated
- Frontline employee participation in safety committee meetings tracking against predetermined participation expectations
- Volume and quality of safety reports collected and documented via local safety committee meetings
- Completion of local safety committee trainings by frontline operations and maintenance employees, and validation of the effectiveness of this training

#### Verification

- Verification for ensuring completion of the required activities will include:
  - Verification of completed guidelines and instructions for meeting attendance and conduct
  - Verification of management review of meeting rosters/attendance sheets
  - Verification of local safety committee trainings for frontline operations and maintenance employees
  - Verification of updated Transit Safety Plan

### BUDGET/COST ESTIMATE

**Overview:** Costs for this item include consulting services to support a comprehensive inventory and review of the existing safety meeting structure, develop explicit and formal guidelines for the expected role and contribution of frontline employees to safety committee meetings, and development of new training materials.

Segment Code	Cost Estimate (\$)
Consulting services for inventory and best practices	100,000
Development of new training materials	100,000
Implementation Support	150,000
Frontline Employee Participation	240,000
<b>Total</b>	<b>590,000</b>



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**CORRECTIVE ACTION PLAN COMMITMENT**

*Responsible Parties*

<b>Department<sup>4</sup></b>	<b>Name</b>	<b>E-mail</b>	<b>Signature</b>
Safety	Michael Catsos <i>Deputy Director of Safety Assurance</i>	[REDACTED]	DocuSigned by: [Signature]
Operations	Erik Stoothoff <i>Acting Chief Operating Officer</i>	[REDACTED]	DocuSigned by: 47975C03951F466... [Signature: Erik Stoothoff]
Labor Relations	Ahmad Barnes <i>Sr Director of Labor Relations</i>	[REDACTED]	DocuSigned by: 420D662BD86D47B... [Signature: Ahmad Barnes]
Human Resources	Tom Waye <i>Chief Human Resources Officer</i>	[REDACTED]	DocuSigned by: C905D70689224D6... [Signature: Tom Waye]
Finance	Mary Ann O'Hara <i>Chief Financial Officer</i>	[REDACTED]	DocuSigned by: D6923AF9EBBE462... [Signature: Mary Ann O'Hara]
Customer Experience	Danny Levy <i>Chief Customer Experience Officer</i>	[REDACTED]	DocuSigned by: 3F02AEEAC6884B1... [Signature: Danny Levy]
Information Technology	John Glennon <i>Chief Information Officer</i>	[REDACTED]	DocuSigned by: AAB14BE2F99B419... [Signature: John Glennon]
Procurement	Jeff Cook <i>Chief Procurement &amp; Contract Administration Officer</i>	[REDACTED]	DocuSigned by: 8501548235C34CF... [Signature: Jeff Cook]

<sup>4</sup> 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:

*Jeffrey D. Gonneville*

12/29/2022

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**Jeffrey D. Gonneville**

*MBTA Deputy General Manager*

Date

DocuSigned by:

*David Panagore*

December 21, 2022

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**David Panagore**

*MBTA Chief Administrative Officer*

Date

DocuSigned by:

*Katie J. Choe*

December 22, 2022

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**Katie J. Choe**

*MBTA Chief of Quality, Compliance & Oversight*

Date

DocuSigned by:

*Ronald Ester*

12/30/2022

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**Ronald Ester**

*MBTA Chief Safety Officer*

Date

DocuSigned by:

*Steve Poflak*

December 19, 2022

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**Steve Poflak**

*MBTA General Manager*

Date