



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA-22-11-MBTA-
CAT3-3

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 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.

FTA Required Action

- 3.A: MBTA must expedite the development of an effective ESRP as a fundamental source of safety information for hazard identification and safety performance monitoring.
- 3.B: As part of the development of an effective ESRP, MBTA must provide explicit direction to frontline employees on what to report and what not to report through the ESRP (including the safety hotline).
- 3.C: As part of the development of an effective ESRP, MBTA must provide refresher training to stakeholder personnel on the role of employee safety reporting within SMS and the crucial contribution managers and supervisors play in the development of an effective safety reporting context.

ANALYSIS AND RECOMMENDATIONS

Analysis

- MBTA's ESRP has been successful in identifying certain hazards patterns and trends. However, certain housekeeping and maintenance reports are periodically misdirected to the ESRP or directed to the ESRP when reports to maintenance departments go unaddressed. The program can be expanded using new and existing tools to collect inputs from a wider range of employees and enhanced to include monitoring of the success of the program in generating prioritized risk information.

Recommendations

- MBTA will review and update documents guiding the ESRP process and perform ongoing monitoring of ESRP inputs and outputs to verify program success.



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ACTION PLAN

Description: MBTA will evaluate existing program documentation and revise as necessary to support an effective ESRP to ensure it is a fundamental source of safety information for hazard identification and safety performance monitoring. MBTA, with the support of a contractor, will evaluate and revise the training, and use a suitable delivery method, to ensure frontline employees are knowledgeable regarding appropriate submissions to the ESRP. An evaluation of mis-applied reports to the ESRP, such as housekeeping and maintenance issues, will be performed with recommendations to improve those reporting avenues. Finally, refresher training addressing the role of employee safety reporting within SMS and the role managers and supervisors play in the development of an effective safety reporting system will be revised and delivered to stakeholder personnel.

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
1.A	Procure Consulting Services	Issue an RFP or initiate a task order to evaluate the procedures and use of the existing ESRP and Maintenance request systems and evaluate and revise training.	QCOO: Katie Choe	10/1/22	11/15/22
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	11/16/22	2/15/23
3.A	Review and Update ESRP Guidance Documents	Perform a comprehensive review of existing program documentation and identify processes, workflows, and tools which will be established to guarantee the success of the ESRP.	QCOO: Katie Choe Safety: Michael Catsos	2/16/23	3/22/23
3.B	Joint Management-Labor Safety Committee Review of ESRP Materials	Present proposed updates to ESRP processes, workflows, and tools to joint management-labor safety committee; incorporate updates in response to feedback as needed.	Safety: Ronald Ester	3/15/23	4/7/23
4	Monitor ESRP / SRM Integration	Ensure that ESRP inputs are fully integrated into the Authority's proactive Safety Risk Management process, including through clear provisions for hazard analysis and risk assessment.	Safety: Michael Catsos	3/23/23	4/23/23
5	Support ESRP / SRM Integration	Establish the management review structure required to support adequate integration of the ESRP and SRM process, including promotion of the ESRP tools to employees, escalation of hazards, risk assessment, and consideration of ESRP inputs against larger background patterns and trends of hazards and risks sourced from other areas including workshops, JHAs, and oversight activities. Required Action 3.A	QCOO: Katie Choe Safety: Ronald Ester	4/24/23	6/1/23
6	Review and Update ESRP Trainings	Update training modules related to employee safety reporting,	QCOO: Katie Choe Safety: Michael Catsos	6/2/23	7/2/23

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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7	Assign Updated ESRP Trainings	Issue and assign / reassign trainings related to the ESRP to key frontline employee groups.	Safety: Ronald Ester HR: Tom Wayne Operations: Jeff Gonville	7/5/23	8/6/23
8	Assess and Document Service Request Process	Evaluate the Authority's existing process for management of housekeeping and maintenance requests; document workflows, resources, and department integration necessary to manage these requests; and address gaps and root causes for maintenance requests being submitted to the ESRP.	QCOO: Katie Choe E&M: Joe Cheever OCE: Joe Pavao Safety: Michael Catsos	8/7/23	10/31/23
9	Promote ESRP Reporting Criteria	Develop and deliver safety promotion materials related to the ESRP, including proper reporting of maintenance and housekeeping issues via other channels. Required Action 3 B	QCOO: Katie Choe Safety: Michael Catsos CX: Danny Levy	11/1/23	12/15/23
10	Promote ESRP Successes and its Role in the Hazardous Management Process	Develop and deliver safety promotion materials related to the ESRP, including success stories related to employee hazard identification and the important role of the ESRP in MBTA's proactive hazard management process. Required Action 3 C	QCOO: Katie Choe Safety: Michael Catsos CX: Danny Levy	11/1/23	12/15/23
11	CAP Verification	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

- Increased volume and quality of safety hazards and risks identified via the ESRP tracked within CIVIX database
- Revised ESRP guidance documents
- Completion rates for trainings related to the ESRP
- Updated ESRP and service request documentation
- Reduction in maintenance and housekeeping issues directed to the ESRP
- Distribution of ESRP promotional materials
- Completion rates for trainings related to the ESRP
- Employee survey results indicating understanding of ESRP resources and willingness to report hazards

Verification

- Verification of successful implementation will include:
 - Confirmation of revisions to ESRP guiding documents
 - Standup of supporting workflows and meeting processes
 - Review and assessment of ESRP inputs and outputs
 - Release and completion of updated ESRP trainings
 - Review and categorization of safety reports in relation to housekeeping and maintenance issues

BUDGET/COST ESTIMATE

Overview: Costs for this item include analyst and management support for monitoring of ESRP program inputs and outputs, vendor support for training material updates, vendor task and meeting support for Safety / E&M / Operations process and document development, and SMS database implementation.

Segment Code	Cost Estimate (\$)
Civix ESRP module build-out and implementation	90,000
Contractor updates to training materials	150,000
Consultant support and development of ESRP / Maintenance Service Request process docs	500,000
Training Support	100,000
Promotional material	200,000
Total	1,040,000



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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]	<i>[Signature]</i> DocuSigned by: 47975C03951F486...
Operations	Erik Stoothoff <i>Acting Chief Operating Officer</i>	[Redacted]	<i>[Signature]</i> DocuSigned by: 47975C03951F486...
Human Resources	Tom Waye <i>Chief Human Resources Officer</i>	[Redacted]	<i>[Signature]</i> DocuSigned by: 420D662BD86D47B...
Finance	Mary Ann O'Hara <i>Chief Financial Officer</i>	[Redacted]	<i>[Signature]</i> DocuSigned by: 06923AF9EBBE462...
Customer Experience	Danny Levy <i>Chief Customer Experience Officer</i>	[Redacted]	<i>[Signature]</i> DocuSigned by: 3F02AECAC6884B1...
Information Technology	John Glennon <i>Chief Information Officer</i>	[Redacted]	<i>[Signature]</i> DocuSigned by: AAB148E2F99B418...
Procurement	Jeff Cook <i>Chief Procurement & Contract Administration Officer</i>	[Redacted]	<i>[Signature]</i> DocuSigned by: 061818320384CF...
Engineering & Maintenance	Joe Cheever <i>Chief of E&M Infrastructure</i>	[Redacted]	<i>[Signature]</i> DocuSigned by: 08251960824B0...
Office of the Chief Engineer	Joe Pavao <i>Acting Chief Engineer</i>	[Redacted]	<i>[Signature]</i> DocuSigned by: 07932C8189384F7...

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> 2BF46BB712FC441	12/29/2022
Jeffrey D. Gonneville MBTA Deputy General Manager	Date

DocuSigned by: <i>David Panagore</i> 181665AFC522457	December 21, 2022
David Panagore MBTA Chief Administrative Officer	Date

DocuSigned by: <i>Katie J. Choe</i> 300898740D64E6	December 22, 2022
Katie J. Choe MBTA Chief of Quality, Compliance & Oversight	Date

DocuSigned by: <i>Ronald Ester</i> 30C098740E337430	12/30/2022
Ronald Ester MBTA Chief Safety Officer	Date

DocuSigned by: <i>Steve Poffak</i> 49C098740E337430	December 19, 2022
Steve Poffak MBTA General Manager	Date