



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA-22-12-MBTA-
CAT4-4

BACKGROUND

Overview: FTA issues Special Directive 22-12 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 seven (7) findings requiring action that the MBTA must take to improve MBTA's management of its operating and maintenance policies, monitoring of rail transit operations, Quality Assurance/Quality Control capabilities, and training and procedures.

PURPOSE

This Corrective Action Plan has been developed to address **Special Directive No. 22-12, Category 4: Operating Conditions and Policies, Procedures, and Training**

FTA Finding

Operating Conditions and Policies, Procedures, and Training

- 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.

FTA Required Action

- 4.A: MBTA must conduct a training needs assessment for rail transit operations and maintenance departments, to include emergency response training. This assessment should identify training that needs to be updated, developed, and supported with additional resources.
- 4.B: MBTA must implement the results of the training needs assessment.
- 4.C: MBTA must consider opportunities and adopt technology and other resources to support training development and training management and record-keeping.

ANALYSIS AND RECOMMENDATIONS

Analysis

MBTA currently provides training to its employees through several different internal and external providers. Internally, MBTA training is made up of the Transportation Training School (Heavy/Light Rail and Bus), Vehicle Maintenance Training (Heavy/Light Rail and Bus Vehicle Maintenance), and Engineering and Maintenance Training (Track, Power, Signals, Facilities Maintenance). Each training department employs instructors who deliver formal in-person training. Additionally, many operations and maintenance roles have a significant on-the-job (OJT) training component. Other departments throughout the MBTA also produce trainings for employees including Safety, Human Resources, Security and Emergency Management, System-Wide Accessibility, IT, etc. The MBTA does not currently have a clear agency-wide training strategy and many of the groups listed above do not have sufficient resources focused specifically on training development and execution.

The MBTA has selected Cornerstone as its system of record for training and is in the process of migrating all training data to that system, however, currently data is stored in a variety of IT systems and, in some cases, paper records.

Recommendations

MBTA will establish an advisory group to assess Operations and Maintenance training programs. This group will focus on establishing and documenting training plans for front line and supervisory roles across all operating divisions including Rail Transportation, OCC, Vehicle Maintenance, and Engineering and Maintenance.



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA-22-12-MBTA-
CAT4-4

- Accelerate migration all training documentation and tracking to the MBTA Learning Management System (LMS)
- Complete a training needs assessment across all operating divisions
- Develop and document training paths for each front-line and supervisory role within each operations division.
- Integrate training provided by all divisions into training plans by role (Safety, Security and Emergency Management, IT, HR, etc.)
- Develop additional content and curricula needed to formalize on-the-job training
- Note: this CAP will build off the work underway in FTA-LC-22-003.

ACTION PLAN

Description: Continue to accelerate the migration of current training documentation and tracking to the LMS. Conduct a training needs assessment for all operating divisions. Review recommendations and prioritize actions to close gaps identified in the assessment. Develop necessary content and implement additional training as needed. Create agreed upon training KPIs and develop dashboards to measure progress. Develop plan to integrate and standardize training governance across all MBTA departments. This plan will be divided into two main scopes:

- Operations Training: Gap analysis, content creation, and implementation of technical training modules for operating departments
- Centralized Training Governance: Establish centralized training organization and governance structure, create LMS governance, training plans, and steady-state training review and governance structure.

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
1	Develop an advisory group	MBTA will develop an advisory group to assess training needs. This group will include members from Transportation, Maintenance, Safety, Security & Emergency Management, System-Wide Accessibility, and HR.	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	10/1/22	11/1/22
2	Strategic Planning Session	Conduct a strategic planning session for SD 22-12 Finding 4 CAP implementation with the advisory group identified in Actionable Item #1.	QCOO: Katie Choe GM: Lynsey Heffernan	11/1/22	11/30/22
3	LMS Migration	Migrate all current training documentation and tracking into the LMS (Learning Hub)	HR: Tom Waye	Ongoing	10/1/24

PART A – OPERATIONS TRAINING

4	Procure consulting services for Operations Training	Issue RFP for consulting services. This consulting engagement will be divided into 3 phases: (1) gap analysis, (2) content creation/revision, (3) Implementation of training programs.	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	10/1/22	1/15/23
5	Onboard consultant	Onboard selected consultant	QCOO: Katie Choe	1/15/23	4/1/23
6	Gap Analysis and Benchmarking for Operations Training	MBTA will complete a third-party gap analysis and benchmarking of training in operations. This includes but is not limited to the following items: available training content, in-	QCOO: Katie Choe Operations: Dave Carney	2/1/23	6/30/23

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



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA-22-12-MBTA-
CAT4-4

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
	(FTA-LC-22-003 Action 3)	person and OJT training programs, resources (human, technology, and physical space), organizational structure, etc. Required Action 4A	E&M: Megan Chann		
7	Establish a schedule for implementation of the proposed opportunities for Operations Training (FTA-LC-22-003 Action 3)	MBTA will review gap analysis and prioritize changes to current training programs. MBTA will establish a plan to address.	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	7/1/23	7/31/23
8	Resource Assessment and hiring plan incorporation (22-09 Finding 1 Action X)	Develop a labor model and org structure to sustainably support operations training. This should include instructor resources, content development, LMS administration, etc. This will also include identifying space and technology needs to support ongoing training activities. Required action 4C	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	8/1/23	4/30/24
9	Develop and formalize content for Operations Training (FTA-LC-22-003 Action 3)	Develop additional content needed to formalize training for all critical operations roles. Required Action 4B	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	8/1/23	2/1/24

PART B – CENTRALIZED TRAINING

10	Procure consulting services for centralized training governance structure	Issue RFP for consulting services. This consulting engagement will be divided into 4 phases: (1) recommendation for required resources and organization, (2) LMS governance structure, (3) Learning path development and governance, (4) Steady-state training reviews and governance.	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	1/1/23	3/1/23
11	Onboard consultant	Onboard selected consultant	QCOO: Katie Choe	3/1/23	4/15/23
12	Develop a plan for centralized training governance	Review current org structure and propose a governance structure including (1) headcount and roles for centralized training, (2) structure for training governance and review, (3) development of learning paths by role	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	4/1/23	7/1/23
13	Training Plan Development	Develop training plan documentation for critical roles across operations and maintenance.	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	6/1/23	5/1/24
14	Develop and document process for updating training plans	MBTA will develop a sustainable solution for reviewing and updating training plans and aligning on agency priorities for training	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann	7/1/23	1/1/24
15	KPI Metrics (FTA-LC-22-003 Action 5)	Develop metrics to measure success for each training division and create dashboards to display those metrics.	QCOO: Katie Choe Operations: Dave Carney	6/1/23	5/1/24



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA-22-12-MBTA-
CAT4-4

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
			E&M: Megan Chann		
16	Develop digital solution to provide access to training materials to front-line employees (FTA-LC-22-003 Action 6, FTA-22-12-MBTA-CAT4-5)	MBTA will ensure front line staff have improved access to training curriculum by assessing potential digital solutions for each area of operations	QCOO: Katie Choe Operations: Dave Carney E&M: Megan Chann IT: John Glennon CX: Danny Levy	8/1/24	11/1/24
17	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	

COMPLETION DOCUMENTATION

Performance Metrics

- Training materials are updated and complete
- All training data is held in the LMS

Verification

- Training to conduct bi-annual review of training materials to ensure the update/version control process is being followed and materials are up to date.
- Training to conduct monthly review of training status with senior managers to ensure monitoring process is being followed and address any issues.

BUDGET/COST ESTIMATE

Overview: The action plan will require hiring consultants to perform a needs assessment, develop and formalize training, and assist with accelerating the LMS implementation across operations. There will also be costs associated with printing training materials, updating technology, and providing appropriate employee spaces for training to be conducted.

Segment Code	Cost Estimate
Printing	\$300,000
Consultants	\$2,000,000
Headcount and Budget (Includes 60.6% Fringe)	\$1,500,000
30% Contingency	\$1,140,000
Total	\$4,940,000



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA-22-12-MBTA-CAT4-4

CORRECTIVE ACTION PLAN COMMITMENT

Responsible Parties

Department⁴	Name	email	Signature
Operations	Erik Stoothoff	[REDACTED]	<small>DocuSigned by:</small> Erik Stoothoff
Operations	Dave Carney	[REDACTED]	<small>DocuSigned by:</small> 420D662BD86D47B...
E&M	Megan Chann	[REDACTED]	<small>DocuSigned by:</small> 318D008138054D0...
Information Technology	John Glennon	[REDACTED]	<small>DocuSigned by:</small> 9F25964BA07643A...
Customer Experience	Danny Levy	[REDACTED]	<small>DocuSigned by:</small> 850151B235C34CF...
Human Resources	Thomas Wayne	[REDACTED]	<small>DocuSigned by:</small> AAB14B2F99B419...
Finance	Mary Anne O'Hara	[REDACTED]	<small>DocuSigned by:</small> 06923AF95BBE462...
Labor Relations	Ahmad Barnes	[REDACTED]	<small>DocuSigned by:</small> 3F02AECA8884B1...
Procurement	Jeffrey Cook	[REDACTED]	<small>DocuSigned by:</small> C995D70689224D6...
General Manager's Office	Lynsey Heffernan	[REDACTED]	<small>DocuSigned by:</small> 68022497BCF94B6...

Executive Leadership of Responsible Parties

DocuSigned by:
Jeffrey D. Gonneville
3BE486B7125C441...
Jeffrey D. Gonneville
MBTA Deputy General Manager

12/29/2022

Date

DocuSigned by:
David Panagore
1816C5AFC522457...
David Panagore
MBTA Chief Administrative Officer

December 21, 2022

Date

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.



The Massachusetts Bay Transportation Authority

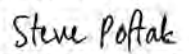
Corrective Action Plan (CAP)

FTA-22-12-MBTA-CAT4-4

Executive Leadership of Responsible Parties

DocuSigned by:  <small>3000398240D64E6...</small>	December 22, 2022
Katie Choe <i>MBTA Chief of Quality, Compliance, and Oversight</i>	Date

DocuSigned by:  <small>30C25B08E237430...</small>	12/30/2022
Ronald Ester <i>MBTA Chief Safety Officer</i>	Date

DocuSigned by:  <small>888CDDC4491D4D5...</small>	December 19, 2022
Steve Poftak <i>MBTA General Manager</i>	Date