



The Massachusetts Bay Transportation Authority

FTA-TRA-22-004

Corrective Action Plan (CAP)

BACKGROUND

Overview: The FTA issued Special Directive 22-4 that required the Massachusetts Bay Transportation Authority (MBTA) to address ongoing safety concerns at MBTA and interim findings uncovered during FTA's Safety Management Inspection (SMI) that was initiated in April 2022.

This Special Directive mandated that MBTA take nine required actions in three distinct categories related to maintenance of way (MOW). These required actions are to address deficiencies in personal protective equipment (PPE) and right of way (ROW) safety; to correct defective track conditions; and to address management practices that negatively impact track repair.

PURPOSE

This Corrective Action Plan has been developed to address **Special Directive 22-4 Category 3: Management Practices** and its Required Action **FTA-TRA-22-004**.

FTA Finding

Management Practices

- MBTA does not provide adequate time to complete necessary MOW maintenance activities.

FTA Required Action

- **FTA-TRA-22-004:** MBTA must document its MOW maintenance needs and develop and implement a schedule to ensure adequate track access to meet maintenance requirements.

ANALYSIS AND RECOMMENDATIONS

Analysis

- The MBTA does not have adequate time to complete necessary MOW maintenance activities
- The MBTA has a documented backlog of corrective maintenance needs
- The MBTA has a growing list of speed restricted track areas
- Under other Corrective Action Plans as a part of Special Directive FTA-TRA-22, the MBTA is developing plans for enhancing the maintenance and capital renewal programs which will require additional track access time

Recommendations

- The MBTA will develop a strategic process for increasing the working time on the Right of Way (ROW) that more effectively balances the work time between maintenance priorities, capital renewal activities, and capital project work. The plan is a four-tiered approach:
 - **Immediate:** Triage, what capacity we have now and how we can address our maintenance needs (now through end of summer)
 - **Short-term:** Expanded work access through diversion procedures for maintenance activities (late summer through mid-fall, end of year, HR dependent)
 - **Mid-term:** OCC fully staffed for current needs, expanded maintenance windows with Early Access diversions, and piloting expanded work windows on non-revenue hours (Employee in Charge concept) (Possibly all of CY 2023)
 - **End state:** Overall increased capacity to perform maintenance activity
- The MBTA will leverage the work of other CAPs addressing the comments of Special Directive FTA-TRA-22.



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ACTION PLAN

- The MBTA will create a Safety Management Working Group (SMWG) to review and document metrics for ROW access availability and working time when on the ROW. This SMWG is expected to include the following departments: E&M (Track, Signals, Power, Facilities), OCE, OCC, Capital Programs, Rail Transportation, Night Operations, Construction Logistics, Bus Transportation, Safety, Environmental, Automated Fare Collection, Labor Relations, HR, Budget, Customer Experience, Real Estate, as well as others.
- The MBTA will evaluate previous initiatives designed to increase track access time as well as policies, procedures, and practices in place for ROW access including the September 8, 2017 "MBTA: Safety Case for Improving Access" (Full report, v02) (Access Report).
- The MBTA will redesign the ROW access process to safely increase working time during non-revenue hours (approximately, 1:00 AM to 5:00 AM) to as close to 4 hours as possible.
- The MBTA will redesign the ROW Access process to incorporate a more predictable schedule for service diversions that can be utilized by all departments as a planning tool for performing work on the ROW.
- The MBTA will explore other options to increase time necessary to complete the required MOW maintenance activities.

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
1	Develop a ROW Access SMWG	Develop a Safety Management Working Group (SMWG) for ROW Access Improvements to evaluate options and opportunities to perform more maintenance and construction work on the ROW, both during non-revenue hours and during service diversions.	OCE: Hadley	7/15/22	7/31/22
2	Review other options to increase ROW access	Explore other options to increase ROW access time. These may include, bussing last train(s), reduced service, increased weekend diversion and extended full diversions.	SMWG: Hadley	7/15/22	9/1/23
3	Establish a schedule for the work of the CAP	Implement a preliminary schedule that addresses all aspects of the anticipated changes to the ROW Access process, procedures, policies, and resource needs, as well as interim solutions to increase working time on the ROW to support the work of other CAPs associated with the findings of Special Directive FTA-TRA-22.	SMWG: Hadley	7/31/22	9/1/22
4	Review the Access Report and any previous internal analysis to increase ROW time	Review the "MBTA: Safety Case for Improving Access" report (Access Report) and any previously internal analysis on that report to determine if there are any viable opportunities the MBTA can capitalize on and implement to increase ROW access.	SMWG: Hadley	7/31/22	10/1/22
5	Develop ROW Access Trial Plan	Develop enhancements to ROW access process and procedures suitable for pilot trial.	SMWG: Hadley	10/2/22	4/1/23

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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#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
6	Execute Trials and Iterations (1-3 phases)	Execute phase 1 trial and then iterate with phase 2 & 3 incorporating any lessons learned from phase 1.	SMWG: Hadley	4/2/23	9/1/23
7	Adopt ROW Access modifications	Formally accept changes to the ROW access procedures by SMWG, present to SMRC for ratification.	SMWG: Hadley	9/2/23	2/1/24
8	Establish a schedule for implementations of the proposed opportunities and options.	Implement a schedule that addresses measures to ensure adequate track access to meet maintenance requirements.	SMWG: Hadley	9/1/23	11/1/23
9	Develop SOPs	Based on the determination of opportunities and options considered by the committee, the MBTA will develop Standard Operating Procedures (SOP) for implementing the enhanced ROW Access process.	SMWG: Hadley	9/2/23	12/31/23
10	Train staff on enhanced ROW Access process and procedures	As part of the SOP, the MBTA will develop a training program and train all staff on the enhanced ROW Access procedures. This material will be distributed, and formal training will be mandatory for all affected personnel prior to enactment.	Training: Cameron	1/1/24	6/30/24
11	Identify and Procure safety equipment	The MBTA will identify the type and quantity of safety equipment required to support the enhanced ROW Access procedures. Ensure that appropriate budgets are built to accommodate the changes.	SMWG: Hadley	4/1/23	1/1/24
12	Define staffing needs	The MBTA will identify the type and quantity of staff required to support the enhanced ROW Access procedures. Ensure that appropriate budgets are built to accommodate the changes.	SMWG: Hadley	4/1/23	1/1/24
13	CAP Verification	MBTA departments will evaluate actionable items/deliverables before submission to FTA to confirm there is evidence that the findings and this required action have been resolved, taking into account the scope and performance measures.	OCE: Hadley	ongoing	

COMPLETION DOCUMENTATION

Performance Metrics

- The work of this CAP will fundamentally change the night and diversion operations of the MBTA. A schedule will be developed to plan and track the work of this CAP. The MBTA will track actual time going forward to perform maintenance activities on the ROW against current schedules to measure progress.

Verification



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Overview: MBTA will track and prioritize maintenance activities requiring ROW Access time and use this tracking mechanism to assess access requirements.

BUDGET/COST ESTIMATE

Overview:

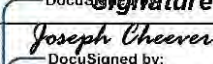
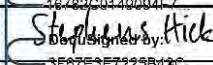
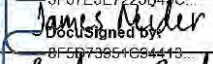
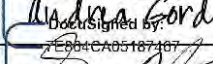

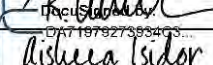
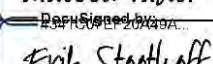
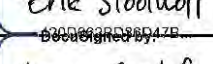

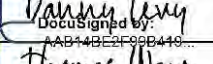
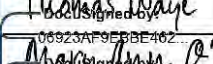
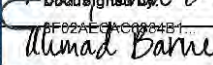
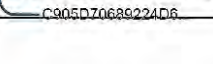
- Retain NetworkRail (original author of Access Report) to assist in potential rollout of opportunities in report.
- Additional personnel, material and equipment to support this effort.

The budget values below are estimates that will require further refinement as the work associated with this CAP is developed and implemented. Estimates include 30% contingency.

Segment Code	Cost Estimate
Network Rail Consulting Task	\$650,000
Materials	\$650,000
Staff	\$1,300,000
Total	\$2,600,000

CORRECTIVE ACTION PLAN COMMITMENT

Responsible Parties

Department ⁴	Name	email	Signature
E&M	Joseph Cheever	[REDACTED]	 DocuSigned by: 36782C9449094F7...
Vehicle Maintenance	Stephens Hicks	[REDACTED]	 DocuSigned by: 3F67E3E7229547C...
Capital Programs	James Neider	[REDACTED]	 DocuSigned by: 8F5073954C94419...
Rail Transportation	Andrea Gordon	[REDACTED]	 DocuSigned by: 7E964CA05187467...
Bus Transportation	Karen Burns	[REDACTED]	 DocuSigned by: A694773390K7450...
Commuter Rail	Ryan Coholan	[REDACTED]	 DocuSigned by: D47197927393493...
OCC & Training	Aisheea Isidor	[REDACTED]	 DocuSigned by: 2AFK509F20793A...
Office of Chief Engineer	Erik Stoothoff	[REDACTED]	 DocuSigned by: 63006938D98947B...
System Wide Accessibility	Laura Brelsford	[REDACTED]	 DocuSigned by: FE526985F09543A...
Customer Experience	Danny Levy	[REDACTED]	 DocuSigned by: AAB148E2F99B440...
Human Resources	Thomas Waye	[REDACTED]	 DocuSigned by: 06923AF9EBBE462...
Budget	Mary Anne O'Hara	[REDACTED]	 DocuSigned by: BF02AECAC099481...
Labor Relations	Ahmad Barnes	[REDACTED]	 DocuSigned by: C905D70689224D6...

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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CORRECTIVE ACTION PLAN COMMITMENT
Responsible Parties

Department⁴	Name	email	Signature
Automated Fare Collection	Vikram Dogra	[REDACTED]	DocuSigned by: Adam Veneziano on behalf of Vikram D. B3B5B879319647B...
Environmental	Janis Kearney	[REDACTED]	DocuSigned by: Janis Kearney E0273AC98C4245C...
Procurement	Jeffrey Cook	[REDACTED]	DocuSigned by: Ray Wise on behalf of Jeffrey Cook BE7997594DED4B2...
Safety	Ronald Ester	[REDACTED]	

Executive Leadership of Responsible Parties

DocuSigned by: Jeffrey D. Gonneville 3BE466B7125C441...	7/15/2022
Jeffrey D. Gonneville MBTA Deputy General Manager	Date
DocuSigned by: David Panagore 1816C5AEC522457...	7/15/2022
David Panagore MBTA Chief Administrative Officer	Date
DocuSigned by: Ronald Ester 30C25B06E237430...	7/15/2022
Ronald Ester MBTA Chief Safety Officer	Date
DocuSigned by: Steve Poftak 8BBCDDC4491D4D5...	7/15/2022
Steve Poftak MBTA General Manager	Date



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