



## The Massachusetts Bay Transportation Authority

### Corrective Action Plan (CAP)

FTA-VSC-22-003

## BACKGROUND

**Overview:** The FTA issued Special Directive 22-5 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 three (3) required actions in three distinct categories related to movement of equipment within yard limits with known or suspected defective brakes or propulsion equipment.

## PURPOSE

This Corrective Action Plan has been developed to address **Special Directive 22-5 Category 1: Vehicle Securement Policies, Procedures and Compliance** and its Required Action **FTA-Special Directive FTA-VSC-22-003**

### *FTA Finding*

- MBTA does not verify that personnel consistently use policies and procedures for movement of trains that do not have working brakes and working propulsion equipment.

### *FTA Required Action*

- **FTA-VSC-22-003:** MBTA must create and implement a compliance program to ensure personnel consistently and accurately use policies and procedures for yard movements of rail vehicles with known or suspected defective brakes or propulsion equipment. Personnel is inclusive of all employees, contractors, oversight, or other individuals who access the rail system and facilities.

## ANALYSIS AND RECOMMENDATIONS

### *Analysis*

- The MBTA created a Safety Management Working Group (SMWG) which includes Vehicle Maintenance, Transportation, Operations Control Center, Training and Safety departments. The SMWG conducted a deep dive analysis on the root cause of why personnel failed to properly prepare trains with defective brakes or propulsion systems to move in yards and maintenance facilities.

### *Recommendations*

- Develop a robust audit process to ensure compliance with initial certification efforts as well as on-going recertification program
- Include as part of a larger existing auditing process, the Safety Rules Compliance Program (SRCP)
- Update the current car house movement SRCP for Heavy & Light Rail Transportation
- Develop new SRCP for yard moves involving vehicles with known or suspected defects such as brake or propulsion issues
- Develop a Vehicle Maintenance audit for movement into/out of the car house including Blue Flag/Blue Signal audit criteria when they are implemented.



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### ACTION PLAN

Description: The MBTA will develop and implement a special order for yard movements of rail vehicles with known or suspected defective brakes or propulsion. The MBTA will develop a special order for the Heavy Rail and Light Rail. We will train all affected personnel which includes Training Staff, Operations Control Center staff, Yard Masters, Yard Motor Persons, Vehicle Maintenance Forepersons and Supervisors.

### PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party <sup>1</sup>	Est Start <sup>2</sup>	Est End <sup>3</sup>
1	<b>Update Procedures:</b> Develop Heavy Rail Special Order which provides clear direction on procedure to move equipment within yard limits and into/out of the car houses and provides clear direction for moving equipment with brake or propulsion issues	Will provide clear direction on procedure to move equipment within yard limits, into/out of the car houses and provide clear direction for moving equipment with brake or propulsion issues	Transportation Dept (Andrea Gordon)	6/22/22	8/1/22
1a	<b>Update Procedures:</b> Develop and implement into procedures, training, and compliance the checklists for coupling/uncoupling and vehicle safety inspection	Incorporate a checklist for coupling/uncoupling and vehicle safety inspection, as required in FTA's immediate action letter into procedures, training and compliance requirements associated with actions for these CAP's.	Transportation Dept (Andrea Gordon) Vehicle Maintenance (Stephens Hicks) Transportation Training & OCC (Aisheea Isidor)		Issued on 8/8/22 Training & compliance 10/15/22
1b	<b>Update Procedures:</b> Develop and implement into procedures, training, and compliance the checklists for car house circle checks	Include circle checks as required in FTA's immediate action letter into procedures, training and compliance requirements associated with actions for these CAP's.	Transportation Dept (Andrea Gordon) Vehicle Maintenance (Stephens Hicks) Transportation Training & OCC (Aisheea Isidor)		Issue on 9/2/22 Training & compliance 11/15/22
1c	<b>Update Procedures:</b> Develop and implement into procedures, training, and compliance the checklists for pre-trip inspections	Incorporate a checklists for pre-trip inspections, as required in FTA's immediate action letter into procedures, training and compliance requirements associated with actions for these CAP's.	Transportation Dept (Andrea Gordon) Vehicle Maintenance (Stephens Hicks) Transportation Training & OCC (Aisheea Isidor)		Issued on 8/8/22 Training & compliance 10/15/22
2	<b>Update Procedures:</b> Develop Light Rail Special Order which provides clear direction on procedure to move equipment within yard limits and into/out of the car and provides clear direction for moving	Will provide clear direction on procedure to move equipment within yard limits into/out of the car houses and provides clear direction for moving equipment with brake or propulsion issues	Transportation Dept (Andrea Gordon)	7/22/22	9/1/22

<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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	equipment with brake or propulsion issues				
<b>2a</b>	<b>Update Procedures:</b> Develop and implement into procedures, training, and compliance the checklists for coupling/uncoupling and vehicle safety inspection	Incorporate a checklist for coupling/uncoupling and vehicle safety inspection, as required in FTA's immediate action letter into procedures, training and compliance requirements associated with actions for these CAP's.	Transportation Dept (Andrea Gordon) Vehicle Maintenance (Stephens Hicks) Transportation Training & OCC (Aisheea Isidor)		Issued 8/8/22 Training & compliance 10/15/22
<b>2b</b>	<b>Update Procedures:</b> Develop and implement into procedures, training, and compliance the checklists for car house circle checks	Include circle checks as required in FTA's immediate action letter into procedures, training and compliance requirements associated with actions for these CAP's.	Transportation Dept (Andrea Gordon) Vehicle Maintenance (Stephens Hicks) Transportation Training & OCC (Aisheea Isidor)		Issue on 9/2/22 Training & compliance 11/15/22
<b>2c</b>	<b>Update Procedures:</b> Develop and implement into procedures, training, and compliance the checklists for pre-trip inspections	Incorporate a checklists for pre-trip inspections, as required in FTA's immediate action letter into procedures, training and compliance requirements associated with actions for these CAP's.	Transportation Dept (Andrea Gordon) Vehicle Maintenance (Stephens Hicks) Transportation Training & OCC (Aisheea Isidor)		Issued 8/8/22 Training & compliance 10/15/22
<b>3</b>	Rewrite existing SRCP audit	Rewrite existing SRCP audit for movement of equipment into/out of the car house, have SRCP committee accept changes and implement the new procedure when training is complete, and the Special Order is released for the location	Transportation Dept (Andrea Gordon)	7/5/2022	10/14/2022
<b>4</b>	Write new SRCP audit for movement of equipment within the yard limits	Write new SRCP audit for movement of equipment within the yard limits, have committee accept changes and implement the new procedure when training is complete, and the Special Order is released for the location	Transportation Dept (Andrea Gordon)	7/5/2022	10/14/2022
<b>5</b>	Vehicle Maintenance will develop an SRCP to audit equipment movement	Vehicle Maintenance will develop an SRCP to audit movement into/out of the car house	Vehicle Maintenance (Stephens Hicks)	7/5/2022	10/14/2022

### COMPLETION DOCUMENTATION

#### Performance Metrics

##### Expected Implementation:

- Train Red Line, Cabot, Codman, and Caddigan yard staff and forepersons on Heavy Rail Special Order for all vehicle yard moves and moving heavy rail vehicles into/out of car houses issued. New Special Orders will be implemented upon completion of training at each location. 11/18/2022
- Train Orange Line, Wellington yard staff and forepersons on Heavy Rail Special Order for all vehicle yard moves and moving heavy rail vehicles into/out of car. New Special Orders will be implemented upon completion of training at each location. 1/6/2023



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- Train Blue Line, Orient Heights yard staff and forepersons trained on Heavy Rail Special Order for all vehicle yard moves and moving heavy rail vehicles into/out of car. New Special Orders will be implemented upon completion of training at each location. 1/27/2023
- Train Green Line, Riverside, Reservoir, Lake Street, Mattapan, and Inner Beltway yard staff and forepersons on Light Rail Special Order for all vehicle yard moves and moving heavy rail vehicles into/out of car. New Special Orders will be implemented upon completion of training at each location. 2/24/2023
- Complete Pin Hitch documents for all rail fleets. 12/15/22

### Verification

#### Overview:

- Rewrite existing SRCP audit for movement of equipment into/out of the car house; have committee accept changes and implement the new procedure when training is complete, and the Special Order is released for the location
- Write new SRCP audit for movement of equipment within the yard limits; have committee accept changes and implement the new procedure when training is complete, and the Special Order is released for the location
- Vehicle Maintenance will develop an SRCP to audit movement into/out of the car house and audit personnel are following the Blue Flag/Blue Signal procedures when they are implemented.

### BUDGET/COST ESTIMATE

#### Overview:

No expected cost, regular part of doing business

Segment Code	Cost Estimate
<b>Total</b>	



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*Corrective Action Plan (CAP)*

**CORRECTIVE ACTION PLAN COMMITMENT**

**Responsible Parties**

Department <sup>4</sup>	Name	Contact Email	Signature
Vehicle Maintenance	Stephens Hicks	[REDACTED]	<small>DocuSigned by:</small> Stephens Hicks <small>3-10-2019 10:58:40</small>
Rail Transportation	Andrea Gordon	[REDACTED]	<small>DocuSigned by:</small> Andrea Gordon <small>2/28/2022 10:15:27</small>

**Executive Leadership of Responsibilities Parties**

DocuSigned by:  
Jeffrey D. Gonneville  
3/23/2022 10:08:11 8/12/2022

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**Jeffrey D. Gonneville**  
MBTA Deputy General Manager Date

DocuSigned by:  
Howaida Kamel  
3/23/2022 10:08:11 8/12/2022

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**Howaida Kamel**  
MBTA Chief of Staff – CAO's Office  
**On behalf of David Panagore**  
MBTA Chief Administration Officer Date

DocuSigned by:  
Matthew DeDonato  
3/23/2022 10:08:11 8/12/2022

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**Matthew DeDonato**  
MBTA Deputy Director of Safety Oversight and Planning  
**On behalf of Ronald Ester**  
MBTA Chief Safety Officer Date

DocuSigned by:  
Jonathan Lenicheck  
3/23/2022 10:08:11 8/12/2022

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**Jonathan Lenicheck**  
MBTA Chief of Staff – GM's Office  
**On behalf of Steve Poftak**  
MBTA General Manager Date

<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.