



## The Massachusetts Bay Transportation Authority

*Corrective Action Plan (CAP)*

FTA-OCC-22-004

### BACKGROUND

**Overview:** The FTA issued Special Directive 22-6 that requires the Massachusetts Bay Transportation Authority (MBTA) to address ongoing safety concerns at MBTA and interim findings from the FTA's Safety Management Inspection (SMI) that was initiated in April 2022.

This Special Directive mandated that MBTA take seven actions to ensure its Operations Control Center (OCC) personnel are adequately trained and certified to perform their job functions, are provided the opportunity for proper rest between shifts, and are not required to fulfill multiple roles within one shift.

### PURPOSE

This Corrective Action Plan has been developed to address **Special Directive 22-6 Category 2: Corrective Plans and Procedures to Ensuring that Operations Control Center Staff Are Recertified and Rested, Finding 4, Required Action FTA-OCC-22-004.**

#### *FTA Finding*

- MBTA requires its OCC personnel to work in a fatigued state as a pattern and practice.

#### *FTA Required Action*

- MBTA must develop and enforce policies that require OCC personnel to work in a rested state. MBTA must modify its hours-of-service policy to require sufficient hours of rest, consistent with MBTA's hours of service policy for rail transit motorpersons.

### ANALYSIS AND RECOMMENDATIONS

#### *Analysis*

- The MBTA Operations Control Center must be staffed with employees who are rested to ensure safe and reliable operations.

#### *Recommendations*

- The MBTA will modify its hours-of-service policy to ensure sufficient hours of rest, consistent with rail transit motorpersons. The MBTA will also develop processes to ensure hours-of-service policies are properly enforced and audited.



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### ACTION PLAN

Description: The OCC will work with MBTA's Training, Lean Strategy (OPSS), OPMI, ITD, HR, and Finance Departments to implement sustainable and auditable process to ensure all dispatchers meet MBTA's hours of service requirements prior to starting any shift. This will consist of:

- Documenting new changes to hours-of-service requirements in a Special Order (SO) and Rulebook
- Creating and issuing Standard Operating Procedure (SOP) to manage hours-of-service requirements
- Creating and implementing audits supported by appropriate documentation to ensure compliance

### PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party <sup>1</sup>	Est Start <sup>2</sup>	Est End <sup>3</sup>
1	Update hours of service policy for OCC dispatchers	Document and issue SO for hours-of-service requirements for dispatchers	OCC (Aisheea Isidor, AGM of OCC & Training)	6/14/22	6/28/22
2	Define policy for OCC Supervisors on how to manage hours of service	Develop and issue SOP for OCC supervisors on how to manage hours-of-service limitation to ensure compliance with revised hours of service requirements, including how Supervisors are tracked if they dispatch	OCC (Kim Dwarika, Division Chief of OCC)	6/20/22	9/1/22
3	Create audit procedure	Create accurate management dashboards for OCC to monitor and ensure compliance with hours-of-service requirements for dispatchers	OPSS (Alessandra Bouchard, Deputy Dir. of Lean Analytics) / ITD (David Metraux, Dep. CIO) / OPMI (David Burns, Dir. of Data Strategy & Matthew MacNab, Mgr. Of Data Visualization)	6/1/22	11/1/22
4	Hire OCC analyst to support compliance	Hire OCC analyst dedicated to tracking and monitoring compliance with this and other OCC CAPs	HR (Gil Alzate, Dir. Of Staffing)	8/1/22	1/15/23
5	Incorporate rule change into rulebook	Incorporate revised hours-of-service requirements into rulebook ( <i>already in update process</i> )	Training (Billy Cameron, Division Chief of Training)	6/15/22	4/1/23

### COMPLETION DOCUMENTATION

#### Performance Metrics

Expected Completion: 4/1/23

- 100% dispatchers worked less than 24 hours of overtime in a week (unless AGM has approved)
- 100% of dispatchers had 10 hours or more between current and previous shift

<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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**Verification**

The verification strategy for ensuring completion of the required work will be through establishing the existence of the following:

- New SO that documents modified hours of service requirements where hours of rest are consistent with MBTA's hours of service policy for rail transit motorpersons.
- Dashboards for accurate and timely monitoring of dispatchers' hours of service
- New SOP and process for OCC operations on how to manage hours of service limitation to ensure compliance with revised hours of service requirements, including how Supervisors are tracked if they dispatch

**BUDGET/COST ESTIMATE**
**Overview:**

Most of items can and will be accomplished with existing resources. However, sustaining the ability to monitor and ensure compliance will require a FTE to support the development, maintenance, and usage of dashboards.

<b>Segment Code</b>	<b>Cost Estimate</b>
OCC Analyst ( <i>also listed in FTA-OCC-22-006</i> )	\$90,000 plus fringe (\$54,540)
25% contingency	\$36,135
<b>Total</b>	<b>\$180,675</b>



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## Corrective Action Plan (CAP)

### CORRECTIVE ACTION PLAN COMMITMENT

#### Responsible Parties

Department	Name	Contact Email	Signature
Transportation Training & OCC	Aishea Isidor AGM of OCC & Training	[REDACTED]	DocuSigned by: Aishea Isidor 3341027EE-0245A...
Operations Planning, Scheduling & Strategy	Kat Benesh Chief of Ops. Strategy, Policy & Oversight	[REDACTED]	DocuSigned by: Katherine Benesh 3D3A7A91P-9E7B3...
ITD	John Glennon CIO	[REDACTED]	DocuSigned by: [REDACTED] 325115281C97CF...
Human Resources	Tom Waye CHRO	[REDACTED]	DocuSigned by: Tom Waye 3E723A70E85E45E2...
Office of Performance Management & Innovation	Rachel Bain Asst. Secretary for Performance Management	[REDACTED]	DocuSigned by: Rachel Bain 3AD7D0E25544501...
Finance	Mary Ann O'Hara CFO	[REDACTED]	DocuSigned by: Mary Ann O'Hara 313A2A2C4C3034801...

#### Executive Leadership of Responsibilities Parties

DocuSigned by: Jeffrey D. Gonneville 32B785971240791...	7/5/2022
<b>Jeffrey D. Gonneville</b> MBTA Deputy General Manager	Date
DocuSigned by: David Panagore 370E53A7C5192497...	7/5/2022
<b>David Panagore</b> MBTA Chief Administration Officer	Date
DocuSigned by: Ronald Ester 30C2E5D36C33743D...	7/5/2022
<b>Ronald Ester</b> MBTA Chief Safety Officer	Date
DocuSigned by: Steve Poftak 3285C020C8F6167D5...	7/5/2022
<b>Steve Poftak</b> MBTA General Manager	Date