



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA-LC-22-002

BACKGROUND

Overview: The FTA issued Special Directive 22-7 as part of its Safety Management Inspection (SMI) initiated in April 2022. The Directive requires the Massachusetts Bay Transportation Authority (MBTA) to address interim findings identified during the SMI.

This Special Directive mandated that MBTA take three actions to ensure that:

- Staff operating revenue service trains and supervising train movements and revenue service trains are certified;
- Personnel with lapsed certifications are not placed on duty to perform or supervise train operations and only trained and certified personnel are scheduled to operate or supervise the movement of railcars; and
- Training materials are created, reviewed, and/or updated to include training and certification manuals for each line, to include manuals for operators and supervisors; rulebooks are updated for all train lines, and version control is enforced; there is a compilation of temporary and permanent orders; and training materials are available electronically to ensure that employees who have enrolled for training have completed the training.

PURPOSE

This Corrective Action Plan has been developed to address **Special Directive 22-7 Category 2: Corrective Plans and Procedures to Ensuring that Operations Staff Are Recertified** and its Required Action **FTA-LC-22-002**.

FTA Finding

- MBTA does not ensure it meets its operational training and recertification requirements for personnel responsible for the movement of railcars.

FTA Required Action

- **FTA-LC-22-002:** MBTA must ensure that personnel with lapsed certifications are not placed on duty to perform or supervise train operations. MBTA must develop and implement procedures to ensure that only trained and certified personnel are scheduled to operate or supervise the movement of railcars.

ANALYSIS AND RECOMMENDATIONS

Analysis

- The MBTA created a Recertification Working Group (RWG) that includes leadership from the Operations Control Center, Training, Transportation, and Information Technology Departments to review Special Directive 22-7.
- The RWG reviewed recertification tracking documentation and engaged stakeholders to complete a current-state analysis.

Recommendations

- The RWG developed actionable items to ensure that only trained and certified personnel operate or supervise train operations including:
 - Developing and disseminating clear and consistent written rules, including roles and responsibilities, regarding maintaining rail recertifications for rail operations personnel.
 - This will be accomplished through a Special Order in the near term, and in the revised Operations Rulebook, re-issued next in 2023.
 - Ensuring that rail operations personnel and their supervisors have a clear means of accessing and reviewing certification expiration dates.



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- Issuing cards to certified rail operations personnel that state certification expiration dates.
- Creating a central repository for rail operations supervisors to access recertification tracking data and to monitor the expiration dates of personnel under their responsibility.

ACTION PLAN

Description: Ensure rules and roles and responsibilities for rail recertifications are documented and communicated. Establish formal tracking and notification system to allow supervisors to proactively oversee and manage compliance to ensure that personnel with lapsed certifications are not placed on duty to perform or supervise train operations. MBTA must develop and implement procedures to ensure that only trained and certified personnel are scheduled to operate or supervise the movement of railcars.

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
1	Launch centralized repository	Provide senior leadership and supervisors access to centralized database that includes last recertification training and expiration dates to identify personnel who need to be enrolled in an upcoming recertification class	Lean Team (Dan Zeigarnik, Director, Lean Strategy) / ITD (John Glennon, CIO)	06/13/22	06/17/22
2	Define rail recertification rules and issue special order outlining rules	Issue Special Order that includes recertification timelines and roles and responsibilities of personnel in ensuring that recertifications remain up to date	Training (Aisheea Isidor, AGM OCC & Ops Training) / Transportation (Andrea Gordon, AGM Rail Ops)	06/15/22	09/01/22
3	Develop labor model to adequately staff Training School	Develop model to determine training staffing needs to recertify personnel at appropriate cadence	Lean Team (Dan Zeigarnik, Director, Lean Strategy) / Training (Aisheea Isidor, AGM OCC & Ops Training)	06/15/22	09/15/22
4	Develop hiring plans to support staffing needs identified through labor models	Identify target and schedule to hire Training personnel necessary to complete rail recertifications (based on labor model)	Human Resources (TomWaye, CHRO)	09/15/22	12/31/22
5	Execute hiring plans	Fill positions for Training personnel (based on hiring plans)	Human Resources (TomWaye, CHRO)	01/01/23	12/31/23
6	Issue recertification cards to rail operations personnel	Print and distribute initial recertification cards with certification expiration date; develop and document process for reissuing cards after subsequent recertifications	Training (Aisheea Isidor, AGM OCC & Ops Training) / Lean Team (Dan Zeigarnik, Director, Lean Strategy) / Transportation (Andrea Gordon, AGM Rail Ops)	06/22/22	01/01/23

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	Include rail recertification rules in next Operations Rulebook update	Include rail recertification rules and personnel roles and responsibilities in ensuring that recertifications remain up to date	Training (Aisheea Isidor, AGM OCC & Ops Training)	06/15/22	04/01/23
8	Formal tracking and notification system	Develop digital centralized tracking system that allows supervisors to proactively oversee and manage process (<i>referenced also in CAP for FTA-OCC-22-007</i>)	Lean Team (Dan Zeigarnik, Director, Lean Strategy) / ITD (John Glennon, CIO) / MassDOT Learning (Tom Waye, CHRO)	06/22/22	07/01/23
9	Develop an audit process for rail recert compliance	Create and document process for adherence to rail recertification rules	Training (Aisheea Isidor, AGM OCC & Ops Training) (Andrea Gordon, AGM Rail Ops)	07/01/23	11/01/23

COMPLETION DOCUMENTATION

Performance Metrics

Expected Completion:

- 100% of relevant rail staff are recertified
- Tracking budgeted-to-filled instructor positions (based upon revised hiring plan)

Verification

Overview:

- Existence and utilization of audit process for Recert Cards

BUDGET/COST ESTIMATE

Overview:

- Training recommends hiring additional instructors to meet Training needs.
- Costs for recertification cards include using a print shop for the initial batches of cards and FARGO printers to print in-house in the future.

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

Segment Code	Cost Estimate
Instructors (15-25 new positions; \$98,987 + 60.6% fringe each)	\$2,384,597 - \$3,974,328
Training analyst (\$90,000 + 60.6% fringe)	\$144,540
FARGO printers	\$20,000
Print shop (recert cards)	\$1,000
30% contingency	\$765,041-\$1,241,960
Total	\$3,315,178 - \$5,381,828



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CORRECTIVE ACTION PLAN COMMITMENT

Responsible Parties

Department ⁴	Name	Contact Email	Signature
Transportation Training & OCC	Aisheea Isidor MBTA AGM of OCC & Training	[REDACTED]	DocuSigned by: Aisheea Isidor [REDACTED]
Operations Planning, Scheduling & Strategy	Wes Edwards MBTA AGM of Service Delivery (OPSS)	[REDACTED]	DocuSigned by: Wes Edwards [REDACTED]
ITD	John Glennon MBTA CIO	[REDACTED]	DocuSigned by: [REDACTED] [REDACTED]
MassDOT Learning	Tom Waye MBTA CHRO	[REDACTED]	DocuSigned by: Tom Waye [REDACTED]
Human Resources	Tom Waye MBTA CHRO	[REDACTED]	DocuSigned by: Tom Waye [REDACTED]
Transit Services	Dave Carney MBTA Chief of Transit Services	[REDACTED]	DocuSigned by: David Carney [REDACTED]
Finance	Mary Ann O'Hara MBTA CFO	[REDACTED]	DocuSigned by: Mary Ann O'Hara [REDACTED]

Executive Leadership of Responsibilities Parties

DocuSigned by: Jeffrey D. Gonneville [REDACTED]	7/20/2022
Jeffrey D. Gonneville MBTA Deputy General Manager	Date
DocuSigned by: David Panagore [REDACTED]	7/20/2022
David Panagore MBTA Chief Administration Officer	Date
DocuSigned by: Ronald Ester [REDACTED]	7/20/2022
Ronald Ester MBTA Chief Safety Officer	Date
DocuSigned by: Steve Poftak [REDACTED]	7/20/2022
Steve Poftak MBTA General Manager	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.