



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA-LC-22-003

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; and 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-22-003**.

FTA Finding

- MBTA does not effectively train and certify personnel responsible for the movement of railcars.

FTA Required Action

FTA-LC-22-003:

- MBTA must create, review, and/or update its training materials to include:
 - Training and certification manuals for each line, to include manuals for operators and supervisors
 - Updated rulebooks for all train lines, enforce version control
 - A compilation of temporary and permanent orders
- MBTA must make training materials available electronically and ensure that employees who have enrolled for training have completed the training.

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 assessed the current approach to managing rail training and certification materials, rulebooks, and temporary and permanent orders and identified gaps and areas of improvement.

Recommendations

- Develop training materials and make them available electronically.
- Update rulebook and develop and document process for enforcing version control.
- Develop compilation of temporary and permanent orders and document process.
- Develop and document process to ensure employees who enroll for training have completed the training.



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ACTION PLAN

Description: Develop training materials and ensure they are available electronically. Finalize rulebook updates. Maintain compilation of temporary and permanent orders. Develop and document process to ensure employees who enroll for training have completed the training.

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
1	Develop and implement compilation of all relevant temporary and permanent orders and document process to be maintained	Develop compilation and clear process with roles and responsibilities to be maintained.	Training (Aisheea Isidor, AGM OCC & Ops Training) / Customer Experience (Danny Levy, Chief Customer Experience Officer)	08/01/22	11/01/22
2	Review, Update, and Publish Operations Rulebook	Include up-to-date rules for training and recertification for each line and rail transit job classification.	Training (Aisheea Isidor, AGM OCC & Ops Training)	06/15/22	04/01/23
3	Create formal training and certification manuals	Identify information that needs to be updated in or added to existing manuals or included in new manuals for light rail, heavy rail, ROW, OCC; create separate manuals for instructors and students	Training (Aisheea Isidor, AGM OCC & Ops Training) / Procurement (Jeff Cook, Chief Procurement & Contracts Admin. Officer)	08/01/22	07/01/24
4	Develop and document process for updating training manuals	Develop and document process for future updates and version control.	Training (Aisheea Isidor, AGM OCC & Ops Training)	08/01/22	07/01/24
5	Develop and document process to ensure employees who enroll for training have completed the training	Provide responsible parties with clear insight into training status and steps that should be taken if training has not been completed.	MassDOT Learning (Tom Waye, CHRO) / ITD (John Glennon, CIO)	08/01/22	07/01/24
6	Develop digital solution to provide access to rail training materials and document process for maintaining	Develop digital solution and clear process with roles and responsibilities for maintaining.	Customer Experience (Danny Levy, Chief Customer Experience Officer) / ITD (John Glennon, CIO)	07/01/24	10/01/24

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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COMPLETION DOCUMENTATION

Performance Metrics

Expected Completion:

- Training materials are updated and complete.

Verification


Overview:

- Training/Customer Experience to conduct quarterly review of compilation of special and temporary orders and training materials to ensure process is being followed and compilation is up to date.
- 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: Training recommends hiring consultants to develop manuals. There will also be a cost associated with printing rulebooks. 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
Rulebooks printing	\$50,000
Consultants	\$1,000,000
30% contingency	\$315,000
Total	\$1,365,000

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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: <i>Aisheea Isidor</i> 4341C07EF20A49A
Operations Planning, Scheduling & Strategy	Wes Edwards MBTA AGM of Service Delivery (OPSS)	[REDACTED]	DocuSigned by: <i>Wes Edwards</i> 82096AC5DCCCE471
ITD	John Glennon MBTA CIO	[REDACTED]	DocuSigned by: <i>John Glennon</i> 856151B235C34CF
MassDOT Learning	Tom Waye MBTA CHRO	[REDACTED]	DocuSigned by: <i>Tom Waye</i> 26923AF9E8E462
Procurement	Jeff Cook MBTA Chief Procurement & Contracts Administration Officer	[REDACTED]	DocuSigned by: <i>Jeff Cook</i> C8238EF50D624B0
Customer Experience	Danny Levy Chief Customer Experience Officer	[REDACTED]	DocuSigned by: <i>Danny Levy</i> A4B74BF2C998413
Finance	Mary Ann O'Hara MBTA CFO	[REDACTED]	DocuSigned by: <i>Mary Ann O'Hara</i> 3F92AE0A06864D1

Executive Leadership of Responsibilities Parties

DocuSigned by: <i>Jeffrey D. Gonneville</i> 35E48D7175C441	7/20/2022
Jeffrey D. Gonneville MBTA Deputy General Manager	Date
DocuSigned by: <i>David Panagore</i> 1816C5AFC522457	7/20/2022
David Panagore MBTA Chief Administration Officer	Date
DocuSigned by: <i>Ronald Ester</i> 3982C995C0C0446	7/20/2022
Ronald Ester MBTA Chief Safety Officer	Date
DocuSigned by: <i>Steve Poftak</i> 88BCDDC4491D4D5	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.