



The Massachusetts Bay Transportation Authority

FTA-22-9-MBTA-CAT1-3

Corrective Action Plan (CAP)

BACKGROUND

Overview: FTA issued Special Directive 22-9 to require the Massachusetts Bay Transportation Authority (MBTA) to address findings documented in FTA's Safety Management Inspection (SMI) report released on August 31, 2022. Conducted between April 14 and June 30, 2022, FTA's SMI reviewed the MBTA rail transit system management, operations, and maintenance programs. This Special Directive identifies four findings requiring action that the MBTA must take to address FTA's findings. The findings and required actions outlined in this Special Directive will assist the MBTA in focusing its attention on balancing demands from operations and capital projects with workforce capacity and capability to inform resource prioritization.

PURPOSE

This Corrective Action Plan has been developed to address **Special Directive No. 22-9, Category 1: Managing the Impact of Operations, Maintenance, and Capital Project Requirements on the Existing Workforce**

FTA Finding

Managing the Impact of Operations, Maintenance, and Capital Project Requirements on the Existing Workforce

- Finding 3: Additional resources are needed to support MBTA's safety engineering and safety certification process for capital projects.

FTA Required Action

- MBTA must modify safety engineering and certification requirements for its capital projects and vehicle procurements and ensure they are addressed through additional E&M and Safety Department staffing, contractor resources, or a combination of approaches. This may be done as part of the workforce analysis in Finding 1, or as part of a separate initiative.

ANALYSIS AND RECOMMENDATIONS`

Analysis

- MBTA's written Safety Certification procedures are not sufficient and not implemented consistently by both Capital Programs and Vehicle Engineering and should be updated.
- MBTA Safety does not currently have sufficient resources to support the project volume for Capital Programs and Vehicle Engineering.
- Engineering and Maintenance does not currently have sufficient resources to support both Operations and Maintenance and Capital Programs

Recommendations

- MBTA will update the MBTA's Safety and Security Certification Program to ensure it is clear, consistent, and in line with current industry standards and best practices.
- MBTA will perform workforce assessment for Safety's Safety Engineering Team and Engineering and Maintenance Team.
- MBTA will ensure that MBTA Safety has adequate resources to support both Capital Programs and Vehicle Engineering projects.

ACTION PLAN



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Description: MBTA will update the present Safety Certification Program (SAFE1.09.00) to incorporate industry standards and best practices, clarify roles and responsibilities, and ensure that resources are available in MBTA Safety and Engineering & Maintenance to support Capital Programs and Vehicle Engineering safety certification activities and programs.

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
1	Develop an advisory group	Establish an advisory group comprised of stakeholder groups that will inform, guide, and approve the work of this corrective action plan	QCOO: Katie Choe Safety: Steven Culp	10/1/2022	10/31/2022
1.A	Short Term Staffing	Assess near term staffing needs and supplement through contracted staff, as needed	Safety: Steven Culp	10/31/2022	3/3/2023
2	Strategic Planning Session	Conduct a strategic planning session for SD 22-9 Finding 3 CAP implementation with the advisory group identified in Actionable Item #1.	QCOO: Katie Choe GM: Lynsey Heffernan	11/1/2022	11/30/2022
3	Procure Consulting Services	Develop and issue an RFP for consulting services to conduct a best practices review of safety engineering and certification activities, support the revision of the safety engineering and certification policy, develop and support training on the policy, and monitor the implementation of the policy.	QCOO: Katie Choe Safety: Steven Culp OCE: Joseph Pavao Operations: Erik Stoothoff	11/15/2022	12/19/2022
4	Onboard Consultant	Onboard selected consultant	QCOO: Katie Choe	12/20/2022	3/3/2023
5	Best Practices Review	Conduct a best practices review that looks at safety engineering and certification practices inside and outside of the transit industry.	QCOO: Katie Choe Safety: Steven Culp	3/6/2023	6/7/2023
6	Assess existing policy	Assess the existing Safety and Security Certification Policy and identify inconsistencies, needed changes and improvements to ensure that it is a process that can be utilized to verify a) safety-related requirements are incorporated into a project, b) the project is operationally ready for revenue service, and c) the project is safe and secure for passengers, employees, public safety agencies, and the general public.	QCOO: Katie Choe Safety: Steven Culp Capital: Maysoon Tawfik Operations: Joseph Cheever	6/8/2023	8/7/2023

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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PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
7	Update policy	Update the Safety and Security Certification Program to an agency-wide policy that will be used as the standard for all MBTA Capital Projects and Vehicle/System Procurements. It will address the issues identified in Actionable Item #6, as well as incorporate industry best practices.	QCOO: Katie Choe Safety: Ron Ester Operations: Jeff Gonneville Capital: James Neider OCE: Joseph Pavao	8/8/2023	10/6/2023
8	Workforce Assessment	Incorporate updated Safety Engineering and Certification Policy and procedures into the Workforce Assessment developed under SD 22-9 Finding #1 corrective action plan.	QCOO: Katie Choe	10/9/2023	12/8/2023
9	Develop Training Materials	Develop training materials to ensure that all affected personnel are informed of the Safety and Security Certification Program requirements.	QCOO: Katie Choe Safety: Steven Culp	10/9/2023	12/31/2023
10	Recruitment and Hiring Plan	Incorporate updated Safety Engineering and Certification Policy and procedures into the Five-Year Recruitment and Hiring Plan developed under SD 22-9 Finding #2 corrective action Plan.	QCOO: Katie Choe HR: Tom Waye	12/1/2023	1/31/2024
11	Training of affected personnel	Training for all personnel involved in the Safety and Security Certification process.	QCOO: Katie Choe Safety: Steven Culp HR: Tom Waye	1/1/2024	6/30/2024
12	CAP Verification	MBTA departments will evaluate actionable items/deliverables before submission to FTA to confirm there is reasonable evidence that the findings and this required action have been resolved, taking into account the scope and performance measures.	QCOO: Katie Choe Safety: Ron Ester	ongoing	

COMPLETION DOCUMENTATION

Performance Metrics

- Completion of revision of MBTA's Safety and Security Certification Program.
- Develop and roll out and training of affected personnel on revised program
- Completion of needs assessment for MBTA Safety and Engineering and Maintenance staffs to support Safety and Security Certifications

Verification

- The completed delivery of the updated Safety and Security Certification Program and associated training.
- Completed Workforce Assessment accounting for new Safety and Security Certification Program
- Completed recruitment and hiring plan for new Safety and Security Certification Program.



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BUDGET/COST ESTIMATE

Overview: Procurement of consultants to assist in the update of the Safety and Security Certification Program, as well as the development of training materials for employees to meet the new standards. The budget values below are estimates that will require further refinement and analysis as the work associated with this CAP is developed and implemented.

<i>Segment Code</i>	<i>Cost Estimate</i>
Professional services to assist in the drafting a new Safety and Security Certification Program that is to be utilized by MBTA	\$1,000,000
Cost of additional resources to be hired to augment MBTA Capital, Safety, and Engineering & Maintenance staffs (assumes 12 FTE, annual cost)	\$2,000,000
30% Contingency	\$900,000
Total	\$3,900,000



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CORRECTIVE ACTION PLAN COMMITMENT

Responsible Parties

Department ⁴	Name	email	Signature
Operations	Erik Stoothoff <i>Acting Chief Operating Officer</i>	[REDACTED]	DocuSigned by: <i>Erik Stoothoff</i> 420D862BD88D47B...
General Manager	Lynsey Heffernan <i>AGM of Policy & Transit Planning</i>	[REDACTED]	DocuSigned by: <i>Lynsey Heffernan</i> 68022497BCF94B6...
Human Resources	Thomas Waye <i>Chief Human Resources Officer</i>	[REDACTED]	DocuSigned by: <i>Tom Waye</i> 05923AF9E8BE462...
Finance	Mary Ann O'Hara <i>Chief Financial Officer</i>	[REDACTED]	DocuSigned by: <i>Mary Ann O'Hara</i> 3F02AECAC6884B1...
Safety	Steven Culp <i>Chief of Safety Engineering and Construction</i>	[REDACTED]	DocuSigned by: <i>Steven Culp</i> ECCC956A8A6F4C0...
Capital	Maysoon Tawfik <i>Chief of Strategy & Capital Innovation</i>	[REDACTED]	DocuSigned by: <i>Maysoon Tawfik</i> 6E7913BEE5714D1...
Operations	Joseph Cheever <i>Chief of Engineering & Maintenance Infrastructure</i>	[REDACTED]	DocuSigned by: <i>Joseph L. Cheever</i> 16782C0149094F7...
Office of Chief Engineer	Joseph Pavao <i>Chief Engineering Officer</i>	[REDACTED]	DocuSigned by: <i>Joseph Pavao</i> 796880741D5F447...

Executive Leadership of Responsible Parties

DocuSigned by:
Jeffrey D. Gonneville
3BE466B7125C441...

Jeffrey D. Gonneville
MBTA Deputy General Manager

12/29/2022

Date

DocuSigned by:
David Panagore
1816C5AFC522457

David Panagore
MBTA Chief Administrative Officer

December 21, 2022

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.



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Executive Leadership of Responsible Parties

<p>DocuSigned by: <i>James Neider</i> <small>8E5D23851C9A113</small> James Neider MBTA Chief of Capital Programs</p>	<p>December 17, 2022</p> <hr/> <p>Date</p>
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<p>DocuSigned by: <i>Katie J. Choe</i> <small>3000898240D64E6</small> Katie Choe MBTA Chief of Quality, Compliance, and Oversight</p>	<p>December 22, 2022</p> <hr/> <p>Date</p>
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<p>DocuSigned by: <i>Ronald Ester</i> <small>20C25B06E237430</small> Ronald Ester MBTA Chief Safety Officer</p>	<p>12/30/2022</p> <hr/> <p>Date</p>
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<p>DocuSigned by: <i>Steve Poftak</i> <small>8BB0D0C4491D4D5</small> Steve Poftak MBTA General Manager</p>	<p>December 19, 2022</p> <hr/> <p>Date</p>
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