



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

March 19, 2025

Mr. Phillip Eng
General Manager
Massachusetts Bay Transportation Authority
10 Park Plaza
Boston, MA 02116

Subject: Response to Closeout Request for FTA-22-MBTA-CAT2-5 (Safety Risk Assessment Guidance)

Dear Mr. Eng:

On October 16, 2024, the Massachusetts Bay Transportation Authority (MBTA) submitted a Corrective Action Plan (CAP) closeout request for FTA-22-MBTA-CAT2-5 (which relates to deficiencies identified in MBTA's Safety Risk Assessment Guidance). MBTA developed this CAP as part of its response to findings issued in category 2 finding 5 of Special Directive (SD) 22-10: Prioritization of Safety Management Information. The Federal Transit Administration (FTA) issued this Special Directive based on its findings of an April 2022 Safety Management Inspection (SMI).

Closeout Approval for FTA-22-MBTA-CAT2-5 (Safety Risk Assessment Guidance)

MBTA submitted the first version of this CAP, FTA-22-MBTA-CAT2-5, on January 13, 2023. After thoroughly reviewing the draft CAP, FTA informed MBTA that it must resubmit the CAP to ensure it is logically structured and sequenced and sufficiently detailed, as the original CAP was lacking in these areas. On September 11, 2023, MBTA submitted the revised CAP, FTA-22-MBTA-CAT2-5, and FTA approved the CAP on October 12, 2023.

This CAP includes 13 action items to address the following findings and required action from SD 22-10:

- **Finding 5:** MBTA's safety risk assessment guidance as part of its Safety Risk Management is ambiguous and has led to confusion among stakeholders regarding their responsibilities and authorities, which has created delays in carrying out safety risk assessments activities.
- **Required Action 5.A:** MBTA must develop and document criteria for conducting safety risk assessments consistent with the basic principles of safety management and the tenets of SMS as conveyed in FTA's SMS guidance materials.

- **Required Action 5.B:** MBTA must develop explicit direction for the ownership of safety risk assessments among the Safety Department and the operating departments. Documentation must include providing explicit roles, responsibilities, and thresholds of authority of each department involved.
- **Required Action 5.C:** MBTA must include in the above criteria directives to ensure that operating departments including subject matter expertise, own safety risk assessments, while safety officials provide support for safety risk assessments and reports on results to Executive Leadership for safety resource allocation priorities.
- **Required Action 5.D:** MBTA must expand its policy of establishing a predefined schedule of safety risk assessment workshops and develop criteria attuned with the nature of hazard identification (i.e., as they are identified), to expedite safety risk assessments to support prioritization for resource allocation.

Between October 30, 2022, and October 16, 2024, MBTA undertook the following actions (and submitted documentation regarding their completion):

- Established a CAP advisory group
- Conducted a strategic planning session
- Procured consulting services
- Onboarded a selected consultant
- Defined criteria for safety risk assessments
- Developed a risk assessment schedule
- Updated criteria for safety risk assessments
- Defined roles and responsibilities
- Workshopped safety risk assessment criteria
- Convened a stakeholder engagement group to identify gaps in training
- Scheduled and delivered Safety Risk Management trainings
- Revised the Transit Safety Plan
- Performed CAP verification

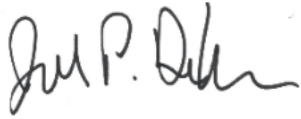
FTA carefully evaluated the submitted documentation and reviewed submissions with MBTA during biweekly meetings on SD 22-10 between October 2022 and January 2025.

Based on review of these submissions, FTA finds that these completed action items adequately satisfy the requirements of FTA-22-MBTA-CAT2-5 and this CAP may now be closed.

Conclusion

This CAP closure represents a tremendous amount of work and FTA greatly appreciates your efforts. Please contact our SMI Coordinator, Christian Hernandez, by phone at (213) 552-3494 or by email at Christian.hernandez@dot.gov with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe P. DeLorenzo".

Joe DeLorenzo
Associate Administrator and
Chief Safety Officer
Office of Transit Safety and Oversight

cc: Peter Butler, Regional Administrator, FTA Region 1
Ryan Coholan, Chief Operating Officer, MBTA
Tim Lesniak, Chief Safety Officer, MBTA
Meredith Sandberg, Chief of Quality, Compliance, and Oversight, MBTA
Pat Lavin, Chief Safety Officer, Massachusetts Department of Transportation
Jamie Van Nostrand, Chair, Massachusetts Department of Public Utilities (DPU)
Robert Hanson, Rail Safety Director, DPU