



U.S. Department
of Transportation
**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

May 5, 2023

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

Subject: Approval – Supplemental Corrective Action Plan for Incorporating Exterior Vehicle Inspection in Special Directive 22-5, Vehicle Securement of Disabled Trains

Dear Mr. Eng:

Thank you and your team for providing an updated supplemental Corrective Action Plan (CAP) to address comments from the Federal Transit Administration (FTA) regarding the proposed approach previously submitted by the Massachusetts Bay Transportation Authority (MBTA) to include exterior vehicle inspection (EVI) as part of the response to [Special Directive 22-5, Vehicle Securement of Disabled Trains](#). FTA received the updated CAP submission as requested on April 28, 2023.

Approval of Supplemental CAP, FTA-VSC-23-001

The goal of this supplemental CAP is to address previously identified FTA concerns and ensure a robust visual inspection of trains prior to their placement in passenger service. Based on the clarifications and additional information provided to the supplemental CAP, **FTA approves FTA-VSC-23-001**.

With approval of this supplemental CAP, FTA also transfers FTA-VSC-22-001, Action Item 13, Hiring Plan, to supplemental CAP FTA-VSC-23-001, as Action Item 1.13. This change further supports FTA's ability to work cooperatively with the MBTA to accept completed SD 22-5 action items for the safe movement of heavy rail transit vehicles in car houses and rail yards, exclusive of the new requirements for EVIs.

As of the date of this letter (May 5, 2023), FTA-VSC-23-001 supersedes the following action items – from previously FTA-approved SD 22-5 CAPs – that focus on the development and implementation of procedures, training, and compliance for pre-trip inspections for heavy rail vehicles:

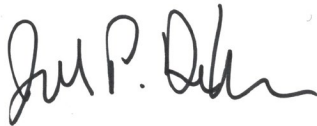
- FTA-VSC-22-001, Action Item 9c (pre-trip inspection procedures);

- FTA-VSC-22-002, Action Item 1c (pre-trip inspection training); and
- FTA-VSC-22-003, Action Item 1c (pre-trip inspection auditing/compliance).

These action items resulted in the development of materials directing the conduct of pre-trip inspections from inside the heavy rail transit vehicle and did not include a visual inspection of the exterior of the vehicle prior to its placement in passenger service. These action items will be removed from all FTA tracking databases and replaced by the corresponding FTA-VSC-23-001 actions items, which focus on development and implementation of new EVI procedures for all heavy rail transit vehicles.

We appreciate your efforts to enhance MBTA's safety performance, and we look forward to working with you as the MBTA continues to improve rail transit vehicle safety and securement. If you have any question, please contact our Safety Management Inspection Coordinator Erin Powell at (771) 200-8016 or by email at Erin.Powell@dot.gov.

Sincerely,



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

Enclosure: Special Directive 22-5 Corrective Action Plan Evaluation Matrix

cc:

Peter Butler, Regional Administrator, FTA Region 1
Jeffrey Gonneville, Deputy General Manager, MBTA
Erik Stoothoff, Acting Chief Operating Officer, MBTA
Ron Ester, Chief Safety Officer, MBTA
Katie Choe, Chief of Quality, Compliance and Oversight
Steve Hicks, Chief Mechanical Officer, MBTA
Pat Richmond, Chief Transportation Officer, MBTA
Robert Hanson, Director, Rail Transportation Safety, DPU



Corrective Action Plan (CAP) Evaluation Matrix for FTA-VSC-23-001
Special Directive 22-5: Vehicle Securement of Disabled Trains – Supplemental Corrective Action Plan for Pre-Trip Inspection

#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
1	Industry Benchmarking	Assess peer transit agencies to review current practices and determine best practices with similar constraints.	QCO: N. Vance Operations: P. Richmond	12/1/2022	6/1/2023	Action Item Approved
1a	Data Gathering & Analysis	Gather data on defects, percentage of vehicles being inspected, incidents related to vehicle defects, etc.	Ops Analytics: D. Zeigarnik QCO: N. Vance	3/24/2023	3/29/2024	Action Item Approved
1.13 ¹	Staffing/Personnel: Hire all relevant positions	Execute hiring plan to fill all currently vacant positions as well as the additional positions needed to support new procedures	Admin: D. Panagore Operations: D. Carney	9/1/2022	12/30/2023	Action Item Approved
Wellington Yard Pilot						
2a	Identify exterior inspection location	Identify primary exterior inspection location that is safe or will be made safe and suitable with modification(s).	QCO: N. Vance Operations: P. Richmond	2/14/2023	3/20/2023	Action Item Approved
2b	Define elements of inspection	Identify critical train components, including the exterior and undercarriage, that must be visually inspected for all Orange Line Vehicles	QCO: N. Vance Operations: P. Richmond	12/18/2022	1/12/2023	Action Item Approved
2c	Establish pass / fail criteria for each component	For each external train component that needs to be visually inspected, clearly define pass / fail criteria.	QCO: N. Vance Operations: P. Richmond	3/16/2023	4/21/2023	Action Item Approved
2d	Create checklist & procure equipment and materials	Develop comprehensive list of task-specific equipment, documentation and tools required for yard Motorpersons to perform external visual inspections.	QCO: N. Vance Operations: P. Richmond	3/16/2023	4/21/2023	Action Item Approved
2e	Develop inspection procedure	Identify how a Yard Motorperson conducts an external vehicle inspection and identify if any support personnel are required	QCO: N. Vance Operations: P. Richmond	3/16/2023	4/21/2023	Action Item Approved
3a	Wellington Safety Hazard Analysis	Complete safety hazard analysis	Safety: R. Ester, A. Williams	4/21/2023	5/5/2023	Action Item Approved

¹ Action Item transferred from FTA-VSC-22-001, Action Item 13 to be monitored and managed as part of supplemental CAP FTA-VSC-23-001.



**Corrective Action Plan (CAP) Evaluation Matrix for FTA-VSC-23-001
Special Directive 22-5: Vehicle Securement of Disabled Trains – Supplemental Corrective Action Plan for Pre-Trip Inspection**

#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
3b	Orange Line SRM Workshop	Perform safety risk management assessment of Wellington and pre-trip inspection procedures for potential mitigation of hazards and approval of process.	QCO: N. Vance Safety: R. Ester, A. Williams Operations: P. Richmond	5/5/2023	5/19/2023	Action Item Approved
4	Union Engagement	Engage union leadership to discuss change in procedures and address potential concerns.	QCO: N. Vance Operations: D. Carney Labor Relations: A. Barnes	3/22/2023	5/5/2023	Action Item Approved
5a	Update Orange Line Procedures	Develop Orange Line Special Order on location specific procedure to perform exterior vehicle inspections at Wellington. Procedure will include checklist of visually observable elements and systems to assess potential defects.	QCO: N. Vance Operations: I. Payne	5/19/2023	6/2/2023	Action Item Approved
5b	Update OCC Procedures	Develop Operations Control Center Special Order which provides clear direction on procedures to allow safe operations to perform pre-trip inspections at Wellington.	QCO: N. Vance Operations: K. Dwarika	5/19/2023	6/2/2023	Action Item Approved
6a	Develop chain of custody system	Develop a chain of custody system to ensure that documentation and status of train defects transfers when takeover of vehicle operations occurs	QCO: N. Vance Operations: P. Richmond	2/23/2023	5/1/2023	Action Item Approved
6b	Develop compliance & audit procedures	Develop compliance & audit procedures to ensure that all required inspections are performed and that handoffs are conducted properly	QCO: N. Vance Operations: P. Richmond	2/23/2023	5/1/2023	Action Item Approved
7	Develop Orange Line Training Program	Work with Vehicle Maintenance, E&M, and heavy rail Training Schools to develop content and strategy (overtime, schedule, delivery method) to train yard motorpersons, yardmasters dispatchers, instructors, Heavy Rail supervisors and VM forepersons. Provide supporting visual guides/illustrations as needed.	QCO: N. Vance Training: F. Hunter	6/2/2023	6/30/2023	Action Item Approved



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8	Staffing Model	Assess current staffing levels at Wellington, as well as impacts to road Motorperson and revenue vehicle schedules	QCO: N. Vance Operations: P. Richmond	4/21/2023	6/1/2023	Action Item Approved
9a	Employee Engagement	Engage yard motorpersons, motorpersons and instructors to discuss change in procedures.	QCO: N. Vance Operations: P. Richmond	5/19/2023	6/9/2023	Action Item Approved
9b	Employee Engagement	Feedback loop from employees; revise procedure; staffing	QCO: N. Vance Operations: P. Richmond	6/9/2023	6/30/2023	Action Item Approved
10a	Wellington Yard Assessment	Engineering & Maintenance performs site assessment at Wellington to determine what infrastructure improvements would benefit exterior vehicle inspections	QCO: N. Vance E&M: J. Cheever	3/20/2023	4/14/2023	Action Item Approved
10b	Capital project improvement assessment	OCE to assess need for design and construction projects for exterior vehicle check locations	OCE: J. Pavao	4/1/2023	7/1/2023	Action Item Approved
10c	Wellington Location Improvements	Engineering & Maintenance prepares Wellington area for safe and efficient pre-trip inspections. If modifications occur, Safety Department reevaluation of the hazards and mitigations is required on the proposed improvements within 2 weeks of the modifications.	QCO: N. Vance E&M: J. Cheever Safety: R. Ester, A. Williams	4/3/2023	6/2/2023	Action Item Approved
11	Train Orange Line Employees	Train yard motorpersons, yardmasters dispatchers, instructors, Heavy Rail supervisors and VM forepersons on how to perform safe and efficient external vehicle inspections	QCO: N. Vance Training: F. Hunter	6/30/2023	8/11/2023	Action Item Approved
12a	Launch external visual inspection pilot	Issue Special Order for Orange Line External Vehicle Inspections and begin pilot program.	QCO: N. Vance Operations: P. Richmond	8/11/2023	10/11/2023	Action Item Approved
12b	Pilot evaluation	Review Pilot performance for effectiveness	QCO: N. Vance Operations: P. Richmond	8/11/2023	10/11/2023	Action Item Approved
12c	Finalize Training Materials	Update training materials, if needed, to reflect findings of the pilot program.	QCO: N. Vance Operations: P. Richmond	10/11/2023	10/25/2023	Action Item Approved



**Corrective Action Plan (CAP) Evaluation Matrix for FTA-VSC-23-001
Special Directive 22-5: Vehicle Securement of Disabled Trains – Supplemental Corrective Action Plan for Pre-Trip Inspection**

#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
12d	Finalize Wellington Procedures	Update procedures and training materials based on pilot evaluation for standard operations. During this interim period between pilot procedure and final procedure, the EVIs will continue using the pilot procedure. Once the procedures have been updated, Safety Department to sign off before finalizing.	QCO: N. Vance Operations: P. Richmond Safety: R. Ester, A. Williams	10/11/2023	10/25/2023	Action Item Approved
12e	Launch finalized external vehicle inspection procedure	Implement any changes to the pilot procedure that were identified in 12b.	QCO: N. Vance Operations: P. Richmond	10/26/2023	Ongoing	Action Item Approved
13	Implement Back-up location	Identify back-up location at Wellington, ensure it is safe to perform visual external inspections. Perform SRM workshop and update procedures, if needed. Once the backup-location is identified, evaluate which action items (1a through 12e) are applicable and need to be updated/implemented to reflect the backup location.	QCO: N. Vance Operations: P. Richmond	4/1/2023	10/25/2023	Action Item Approved
Orient Heights Yard Pilot						
14a	Identify external inspection location	Identify primary exterior inspection location that is safe or will be made safe and suitable with modification(s).	QCO: N. Vance Operations: P. Richmond	3/24/2023	4/14/2023	Action Item Approved
14b	Define elements of inspection	Identify critical train components, including exterior and undercarriage, that must be visually inspected	QCO: N. Vance Operations: P. Richmond	3/31/2023	4/28/2023	Action Item Approved
14c	Establish pass / fail criteria for each component	For each external train component that needs to be visually inspected, clearly define pass / fail criteria.	QCO: N. Vance Operations: P. Richmond	4/14/2023	5/12/2023	Action Item Approved
14d	Create checklist & procure tools	Develop comprehensive list of task-specific equipment, documentation and tools required for yard Motorpersons to perform external visual inspections. Provide	QCO: N. Vance Operations: P. Richmond	4/14/2023	5/12/2023	Action Item Approved



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#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
		verification (documentation) that task specific-equipment, documentation and tools developed for the yard motorperson are fully compliant with all ROW policies, procedures, and terminology, to include PPE and tools.				
14e	Develop inspection procedure	Identify how a Yard Motorperson conducts a visual external inspection and identify if any support personnel are required	QCO: N. Vance Operations: P. Richmond	4/14/2023	5/12/2023	Action Item Approved
15a	Blue Line Safety Hazard Analysis	Complete safety hazard analysis	Safety: R. Ester, A. Williams	5/12/2023	6/2/2023	Action Item Approved
15b	Blue Line SRM Workshop	Perform safety risk management assessment of Orient Heights and pre-trip inspection procedures for potential mitigation of hazards and approval of process.	QCO: N. Vance Safety: R. Ester, A. Williams Operations: P. Richmond	6/2/2023	6/16/2023	Action Item Approved
16	Union Engagement	Engage union leadership to discuss change in procedures and address potential concerns.	QCO: N. Vance Operations: D. Carney Labor Relations: A. Barnes	3/22/2023	5/26/2023	Action Item Approved
17a	Update Blue Line Procedures	Develop Blue Line Special Order on location specific procedure to perform pre-trip inspections at Orient Heights. Procedure will include checklist of visually observable elements and systems to assess potential defects.	QCO: N. Vance Operations: P. Richmond	6/16/2023	6/30/2023	Action Item Approved
17b	Update OCC Procedures	Develop Operations Control Center Special Order which provides clear direction on procedures to allow safe operations in order to perform pre-trip inspections at Orient Heights.	QCO: N. Vance Operations: K. Dwarika	6/16/2023	6/30/2023	Action Item Approved
18a	Develop chain of custody system	Develop a chain of custody system to ensure that documentation and status of train defects transfers when takeover of vehicle operations occurs	QCO: N. Vance Operations: P. Richmond	6/23/2023	6/30/2023	Action Item Approved



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#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
18b	Develop compliance & audit procedures	Develop compliance & audit procedures to ensure that all required inspections are performed and handoffs are conducted properly	QCO: N. Vance Operations: P. Richmond	6/23/2023	6/30/2023	Action Item Approved
19	Develop Blue Line Training Program	Work with Vehicle Maintenance, E&M, and heavy rail Training Schools to develop content and strategy (overtime, schedule, delivery method) to train yard motorpersons, yardmasters dispatchers, instructors, Heavy Rail supervisors and VM forepersons. Provide supporting visual guides/illustrations as needed.	QCO: N. Vance Training: F. Hunter	6/30/2023	7/21/2023	Action Item Approved
20	Staffing Model	Assess current staffing levels at Orient Heights, as well as impacts to road Motorperson and revenue vehicle schedules	QCO: N. Vance Operations: P. Richmond	5/12/2023	6/16/2023	Action Item Approved
21a	Employee Engagement	Engage yard motorpersons, motorpersons and instructors to discuss change in procedures.	QCO: N. Vance Operations: P. Richmond	6/30/2023	7/14/2023	Action Item Approved
21b	Employee Engagement	Feedback loop from employees; revise procedure; staffing	QCO: N. Vance Operations: P. Richmond	7/14/2023	7/28/2023	Action Item Approved
22a	Orient Heights Yard Assessment	Engineering & Maintenance performs site assessment at Orient Heights to determine what infrastructure improvements would benefit exterior vehicle inspections	QCO: N. Vance E&M: J. Cheever	4/14/2023	4/28/2023	Action Item Approved
22b	Capital project improvement assessment	OCE to assess need for design and construction projects for exterior vehicle check locations	OCE: J. Pavao	4/1/2023	7/1/2023	Action Item Approved
22c	Orient Heights Location Improvements	Engineering & Maintenance prepares Orient Heights area for safe and efficient pre-trip inspections. If modifications occur, Safety Department reevaluation of the hazards and mitigations is required on the	QCO: N. Vance E&M: Joe Cheever Safety: R. Ester, A. Williams	5/12/2023	6/30/2023	Action Item Approved



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Special Directive 22-5: Vehicle Securement of Disabled Trains – Supplemental Corrective Action Plan for Pre-Trip Inspection

#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
		proposed improvements within 2 weeks of the modifications.				
23	Train Blue Line Employees	Train yard motorpersons, yardmasters dispatchers, instructors, Heavy Rail supervisors and VM forepersons on how to perform safe and efficient external vehicle inspections	QCO: N. Vance Training: F. Hunter	7/28/2023	9/1/2023	Action Item Approved
24a	Launch external visual inspection pilot	Issue Special Order for Blue Line External Vehicle Inspections and begin pilot program.	QCO: N. Vance Operations: P. Richmond	9/1/2023	11/1/2023	Action Item Approved
24b	Pilot evaluation	Review Pilot performance for effectiveness	QCO: N. Vance Operations: P. Richmond	9/1/2023	11/1/2023	Action Item Approved
24c	Finalize Training Materials	Update training materials, if needed, to reflect findings of the pilot program.	QCO: N. Vance Operations: P. Richmond	11/1/2023	11/15/2023	Action Item Approved
24d	Finalize Orient Heights Procedures	Update procedures and training materials based on pilot evaluation for standard operations. During this interim period between pilot procedure and final procedure, the EVIs will continue using the pilot procedure. Once the procedures have been updated, Safety Department to sign off before finalizing.	QCO: N. Vance Operations: P. Richmond Safety: R. Ester, A. Williams	11/1/2023	11/15/2023	Action Item Approved
24e	Launch finalized external vehicle inspection procedure	Implement any changes to the pilot procedure that were identified in 24b.	QCO: N. Vance Operations: P. Richmond	11/16/2023	Ongoing	Action Item Approved
25	Implement Back-up location	Identify back-up location at Orient Heights, ensure it is safe to perform visual external inspections. Perform SRM workshop and update procedures, if needed. Once the backup-location is identified, evaluate which action items (14a through 24e) are applicable and need to be updated/implemented to reflect the backup location.	QCO: N. Vance Operations: P. Richmond	4/1/2023	11/15/2023	Action Item Approved



Corrective Action Plan (CAP) Evaluation Matrix for FTA-VSC-23-001

Special Directive 22-5: Vehicle Securement of Disabled Trains – Supplemental Corrective Action Plan for Pre-Trip Inspection

#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
Red Line Yard Pilot						
26a	Identify external inspection location	Identify primary exterior inspection location that is safe or will be made safe and suitable with modification(s).	QCO: N. Vance Operations: P. Richmond	3/24/2023	4/28/2023	Action Item Approved
26b	Define elements of inspection	Identify critical train components, including exterior and undercarriage, that must be visually inspected	QCO: N. Vance Operations: P. Richmond	4/28/2023	5/26/2023	Action Item Approved
26c	Establish pass / fail criteria for each component	For each external train component that needs to be visually inspected, clearly define pass / fail criteria and provide supporting visual guides/illustrations as needed.	QCO: N. Vance Operations: P. Richmond	5/12/2023	6/9/2023	Action Item Approved
26d	Create checklist & procure tools	Develop comprehensive list of task-specific equipment, documentation and tools required for yard Motorpersons to perform external visual inspections. Provide verification (documentation) that task specific-equipment, documentation and tools developed for the yard motorperson are fully compliant with all ROW policies, procedures, and terminology, to include PPE and tools.	QCO: N. Vance Operations: P. Richmond	5/12/2023	6/9/2023	Action Item Approved
26e	Develop inspection procedure	Identify how a Yard Motorperson conducts a visual external inspection and identify if any support personnel are required	QCO: N. Vance Operations: P. Richmond	5/12/2023	6/9/2023	Action Item Approved
27a	Red Line Safety Hazard Analysis	Complete safety hazard analysis	Safety: R. Ester, A. Williams	6/9/2023	6/30/2023	Action Item Approved
27b	Red Line SRM Workshop	Perform safety risk management assessment of Red Line and pre-trip inspection procedures for potential mitigation of hazards and approval of process.	QCO: N. Vance Safety: R. Ester, A. Williams Operations: P. Richmond	6/30/2023	7/14/2023	Action Item Approved
28	Union Engagement	Engage union leadership to discuss change in procedures and address potential concerns.	QCO: N. Vance Operations: D. Carney	3/22/2023	7/14/2023	Action Item Approved



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Special Directive 22-5: Vehicle Securement of Disabled Trains – Supplemental Corrective Action Plan for Pre-Trip Inspection

#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
			Labor Relations: A. Barnes			
29a	Update Red Line Procedures	Develop Red Line Special Order on location specific procedure to perform pre-trip inspections. Procedure will include checklist of visually observable elements and systems to assess potential defects.	QCO: N. Vance Operations: S. Daley	7/14/2023	8/4/2023	Action Item Approved
29b	Update OCC Procedures	Develop Operations Control Center Special Order which provides clear direction on procedures to allow safe operations in order to perform pre-trip inspections on Red Line.	QCO: N. Vance Operations: K. Dwarika	7/14/2023	8/4/2023	Action Item Approved
30a	Develop chain of custody system	Develop a chain of custody system to ensure that documentation and status of train defects transfers when takeover of vehicle operations occurs	QCO: N. Vance Operations: P. Richmond	7/21/2023	8/4/2023	Action Item Approved
30b	Develop compliance & audit procedures	Develop compliance & audit procedures to ensure that all required inspections are performed and handoffs are conducted properly	QCO: N. Vance Operations: P. Richmond	7/21/2023	8/4/2023	Action Item Approved
31	Develop Red Line Training Program	Work with Vehicle Maintenance, E&M, and heavy rail Training Schools to develop content to train yard motorpersons, yardmasters dispatchers, instructors, Heavy Rail supervisors and VM forepersons. Provide supporting visual guides / illustrations as needed.	QCO: N. Vance Training: F. Hunter	8/4/2023	8/25/2023	Action Item Approved
32	Staffing Model	Assess current staffing levels on Red Line, as well as impacts to road Motorperson and revenue vehicle schedules	QCO: N. Vance Operations: P. Richmond	6/23/2023	7/28/2023	Action Item Approved
33a	Employee Engagement	Engage yard motorpersons, motorpersons and instructors to discuss change in procedures.	QCO: N. Vance Operations: P. Richmond	8/4/2023	8/18/2023	Action Item Approved



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#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
33b	Employee Engagement	Feedback loop from employees; revise procedure; staffing	QCO: N. Vance Operations: P. Richmond	8/11/2023	8/25/2023	Action Item Approved
34a	Red Line Yard Assessment	Engineering & Maintenance performs site assessment at Red Line location to determine what infrastructure improvements would benefit exterior vehicle inspections	QCO: N. Vance E&M: J. Cheever	4/28/2023	5/26/2023	Action Item Approved
34b	Capital project improvement assessment	OCE to assess need for design and construction projects for exterior vehicle check locations	OCE: J. Pavao	4/1/2023	7/1/2023	Action Item Approved
34c	Red Line Location Improvements	Engineering & Maintenance prepares Orient Heights area for safe and efficient pre-trip inspections. If modifications occur, Safety Department reevaluation of the hazards and mitigations is required on the proposed improvements within 2 weeks of the modifications.	QCO: N. Vance E&M: Joe Cheever Safety: R. Ester, A. Williams	6/9/2023	7/28/2023	Action Item Approved
35	Train Red Line Employees	Train yard motorpersons, yardmasters dispatchers, instructors, Heavy Rail supervisors and VM forepersons on how to perform safe and efficient external vehicle inspections	QCO: N. Vance Training: F. Hunter	9/1/2023	10/6/2023	Action Item Approved
36a	Launch external visual inspection pilot	Issue Special Order for Red Line External Vehicle Inspections and begin pilot program.	QCO: N. Vance Operations: P. Richmond	10/6/2023	12/6/2023	Action Item Approved
36b	Pilot evaluation	Review Pilot performance for effectiveness	QCO: N. Vance Operations: P. Richmond	10/6/2023	12/6/2023	Action Item Approved
36c	Finalize Training Materials	Update training materials, if needed, to reflect findings of the pilot program.	QCO: N. Vance Operations: P. Richmond	12/6/2023	12/29/2023	Action Item Approved
36d	Finalize Red Line Procedures	Update procedures and training materials based on pilot evaluation for standard operations. During this interim period between pilot procedure and final procedure, the EVIs will continue using the pilot procedure. Once the procedures have	QCO: N. Vance Operations: P. Richmond Safety: R. Ester, A. Williams	12/6/2023	12/29/2023	Action Item Approved



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#	Actionable Item	Description	Responsible Party	Estimated Start Date	Estimated End Date	FTA Approval Status
		been updated, Safety Department to sign off before finalizing.				
36e	Launch finalized external vehicle inspection procedure	Implement any changes to the pilot procedure that were identified in 36b.	QCO: N. Vance Operations: P. Richmond	12/30/2023	Ongoing	Action Item Approved
37	Implement Back-up location	Identify back-up location on Red Line, ensure it is safe to perform visual external inspections. Perform SRM workshop and update procedures, if needed. Once the backup-location is identified, evaluate which action items (26a through 36e) are applicable and need to be updated/implemented to reflect the backup location.	QCO: N. Vance Operations: P. Richmond	5/1/2023	12/29/2023	Action Item Approved
38	Evaluate Pilot	After the completion of all 3 pilots, the MBTA will evaluate their effectiveness and develop a plan for making exterior vehicle inspections permanent for all 3 Heavy Rail Lines	QCO: N. Vance Operations: P. Richmond	12/29/2023	3/29/2024	Action Item Approved
39	Update Training for certifications and recertifications	Determine what elements of recertification need to be revised to incorporate exterior vehicle inspections	QCO: N. Vance Training: F. Hunter	12/29/2023	2/23/2024	Action Item Approved
40	Update Design Standards	Review design standards and directives to revise and reissue to accommodate exterior vehicle inspections for Heavy Rail locations	QCO: N. Vance OCE: J. Pavao	6/30/2023	3/29/2024	Action Item Approved