

**FTA Response to MBTA's 9-29-2023 Relief Request for SD 22-5, SD 22-6, SD 22-7, SD 22-9, SD 22-11, SD 22-12, CAP 23-12 and IAL
Corrective Action Plan (CAP) Evaluation Matrix**

Finding and Required Action	Proposed CAP Items	Due Dates	FTA Comments
Special Directive (SD) 22-5, CAP FTA-VSC-23-001			
<p><u>Finding:</u> MBTA does not verify that personnel consistently use policies and procedures for movement of trains that do not have working brakes and working propulsion equipment. On February 14, 2023, the FTA provided additional direction after review of Operations Special Order #22-155, Procedure for Heavy Rail Vehicle Pre-Trip Inspections, dated August 5, 2022. The required action was to amend the procedure to include adequate checklist(s) and training for staff to perform static exterior vehicle checks during pre-trip inspections and to clarify the process of how the MBTA performs multiple vehicle inspections.</p> <p><u>Required Action:</u> MBTA must create and implement a compliance program to ensure personnel consistently and accurately use policies and procedures for yard movements of rail vehicles with known or suspected defective brakes or propulsion equipment. Personnel is inclusive of all employees, contractors, oversight, or other individuals who access the rail system and facilities. FTA's review requires additional information and considerations to address the requirements identified in Finding 3 of FTA's Special Directive 22-5, per FTA statements on 2/14/23, the MBTA must revise procedures for exterior inspections, including pre-trip inspections and circle</p>	12c. Finalize Training Materials	Original: 10/25/23 Proposed: 11/10/23	Approved.
	12d. Finalize Wellington Procedures	Original: 10/25/23 Proposed: 11/10/23 Extended: 11/17/23	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time to accommodate the Safety Department's (Safety's) involvement in development and/or sign off on materials.
	12e. Launch finalized external vehicle inspection procedure	Original: 10/26/23 Proposed: 11/13/23 Extended: 11/20/23	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time to ensure sufficient time between Safety sign-off and implementation for training to occur. FTA recommends that MBTA review the schedule to allow updating of procedures, sign-off by Safety, and training to occur.
	24c. Finalize Training Materials	Original: 11/15/23 Proposed: 12/1/23	Approved.
	24d. Finalize Orient Heights Procedures	Original: 11/15/23 Proposed: 12/1/23 Extended: 12/8/23	Approved. See comment on CAP Item 12d above.
	24e. Launch finalized external vehicle inspection procedure	Original: 11/16/23 Proposed: 12/4/23 Extended: 12/11/23	Approved. See comment on CAP Item 12d above.
	36c. Finalize Training Materials	Original: 12/29/23 Proposed: 1/19/24	Approved.
	36d. Finalize Red Line Procedures:	Original: 12/29/23 Proposed: 1/19/24 Extended: 1/26/24	Approved. See comment on CAP Item 12d above.

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checks and include those revisions in the rulebook.	36e. Launch finalized external vehicle inspection procedure	Original: 12/30/23 Proposed: 1/21/24 Extended: 1/28/24	Approved. See comment on CAP Item 12e above.
SD 22-6, CAP FTA-OCC-22-007			
<p><u>Finding:</u> MBTA allows dispatchers who are not current in their certifications to work in the OCC.</p> <p><u>Required Action:</u> MBTA must verify that all dispatchers working within the OCC are current in their certifications prior to starting their shift.</p>	5. Specialized dispatcher certification	Original: 1/1/24 Proposed: 3/1/24	Approved.
SD 22-7, CAP FTA-LC-22-002			
<p><u>Finding:</u> MBTA does not ensure it meets its operational training and recertification requirements for personnel responsible for the movement of railcars.</p> <p><u>Required Action:</u> 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.</p>	9. Develop an audit process for rail recert compliance	Original: 11/1/23 Proposed: 4/30/24	<p>Conditionally Approved. As a condition of approval:</p> <ol style="list-style-type: none"> 1. Until such time as the final audit process is in use, MBTA must develop and implement a temporary process that verifies all personnel responsible for movement of rail cars are certified. 2. Additionally, MBTA must report to the FTA on results of the temporary process and the final audit process no less than monthly effective November 2023.
SD 22-7, CAP FTA-LC-22-003			
<p><u>Finding:</u> MBTA does not effectively train and certify personnel responsible for the movement of railcars.</p>	3. Create formal training and certification manuals	Original: 7/1/24 Proposed: 11/1/24	Not approved. This is a safety sensitive issue and the MBTA must make this a priority. The due date is currently 9 months away.

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<p><u>Required Action:</u> MBTA must create, review, and/or update its training materials to include:</p> <ul style="list-style-type: none"> • 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 <p>MBTA must make training materials available electronically and ensure that employees who have enrolled for training have completed the training.</p>			
SD 22-9, CAP FTA-22-9-MBTA-CAT1-1			
<p><u>Finding:</u> MBTA’s staffing levels are not commensurate with the demand for human resources required to carry out current rail transit operations and maintenance in addition to executing capital program activities.</p> <p><u>Required Action:</u> MBTA must conduct and submit to FTA a workforce analysis and associated workforce planning to include:</p> <p>1. Required activities that must be performed for rail transit operations, maintenance, and capital projects delivery: A description of present and projected day-to-day requirements for rail transit operations, preventive and corrective maintenance, and capital project delivery through the next five fiscal years.</p>	<p>9. Finalize safety risk assessment</p>	<p>Original: 8/31/23 Proposed: 5/10/24</p>	<p>Conditionally approved. As a condition of approval, MBTA must:</p> <ol style="list-style-type: none"> 1. Re-submit a near-final draft of its Safety Risk Assessment (SRA) to FTA no later than (NLT) 2/9/24. Final draft of the SRA must reflect a complete SRA with very minor edits, if any. The Workforce Assessment (WFA) and the SRA have interdependencies and must be designed for sustainable and repeated use (as tools that can be refined repeatedly to meet MBTA’s current needs). MBTA must provide complete and final versions (not in-progress). 2. Review and incorporate, or otherwise respond to, FTA's provided comments before the next draft submission. 3. Provide status updates during the biweekly meetings. This provides an opportunity to address any questions or concerns MBTA may have regarding the draft as well as the opportunity for FTA to provide guidance. Workforce management and organizational development leadership supporting or consulting on SRA development must attend these meetings. No deliverables are required to be submitted in advance.

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<p>2. Required resources to perform mission-critical activities: A description of the assignment of the necessary human resources to support present and projected day-to-day requirements for rail transit operations, preventive and corrective maintenance, and capital project delivery through the next five fiscal years per the description above.</p> <p>3. Current staffing capabilities for mission-critical activities: The results of an assessment of MBTA’s ability to safely operate, maintain, and complete capital project delivery for its rail transit system at current service levels of workforce.</p> <p>4. Safety case for mission-critical activities that can be performed within current and projected resources over the next five fiscal years: The identification of safety risk associated with current staffing shortages and how they are or will be mitigated and any needed changes or reductions in activities.</p>			<p>4. Operations, Maintenance, Safety and Risk Management must review and approve the SRA to ensure it meets industry standards prior to submission to FTA. MBTA must submit documentation of this review and approval to FTA.</p>
	<p>10. Final MBTA internal review and sign-off of workforce assessment</p>	<p>Original: 9/28/23 Proposed: 5/10/24</p>	<p>Conditionally approved. As a condition of approval, MBTA must:</p> <ol style="list-style-type: none"> 1. Re-submit a near final WFA draft to FTA NLT 2/9/24. Final draft requires a complete WFA that only needs minor edits, if any. The WFA and the SRA have interdependencies and must be designed for sustainable and repeated use (as tools that can be refined repeatedly to meet MBTA’s current needs). MBTA must submit complete and final versions (not in-progress). 2. Review and incorporate, or otherwise respond to, FTA's provided comments before the next draft submission. 3. Provide status updates during the biweekly meetings. This provides an opportunity to address any questions or concerns MBTA may have regarding the draft as well as the opportunity for FTA to provide guidance. Workforce management and organizational development leadership supporting or consulting on WFA development must attend these meetings. No deliverables are required to be submitted in advance. 4. All affected functional areas (director level or above) and the General Manager must review and approve the WFA to ensure it meets MBTA’s needs and priorities. This approval must occur prior to submission to FTA. MBTA must submit documentation of this review and approval to FTA.
	<p>10A. Present WFA to MBTA Board</p>	<p>Original: 12/31/23 Proposed: 6/21/24</p>	<p>Approved. FTA recommends, but does not require, that MBTA consider the MBTA Board process timeline in the event there are comments or issues with the final version of the WFA.</p>

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SD 22-9, CAP FTA-22-9-MBTA-CAT1-2			
<p><u>Finding:</u> MBTA has not demonstrated the organizational capacity to recruit and hire personnel to meet authorized staffing levels.</p> <p><u>Required Action:</u> MBTA must develop and implement a recruitment and hiring plan to address findings from its workforce analysis and associated workforce planning for at least a five-year period, including how it will expand its capabilities for recruiting and hiring personnel to fill operations, maintenance, and capital project delivery positions.</p>	<p>8. Prepare and review first draft of five-year hiring plan</p>	<p>Original: 12/1/23 Proposed: 7/12/24</p>	<p>Conditionally approved. As a condition of approval, MBTA must:</p> <ol style="list-style-type: none"> 1. Develop a Recruiting and Hiring Plan. Adding headcount and achieving hiring goals is not part of this action item. The objective of the Recruiting and Hiring Plan is to assess MBTA's strengths, weaknesses, opportunities, and risks (SWOT) in recruiting, hiring, on-boarding, and retention. Achieving MBTA’s hiring goals will be the result of a successful Recruiting and Hiring Plan, which will inform and drive MBTA’s prioritization and effective budgeting for achieving its hiring goals. The Recruiting and Hiring Plan must be an actionable document that can be evaluated regularly to assess hiring and recruiting effectiveness. 2. Submit a Final Draft of the Recruiting and Hiring Plan to FTA NLT 5/10/24. Final draft of the Recruiting and Hiring Plan must be complete/near final and only require minor edits, if any. The SRA and WFA must both be routed to MBTA leadership at the same time for review and approval and must inform the Recruiting and Hiring Plan so it can be fine-tuned for successful implementation. FTA’s Required Action under CAP 2 specifies that the Recruiting and Hiring Plan will be developed to address the findings from the WFA. The Recruiting and Hiring Plan has interdependencies with the WFA and the SRA and must be designed for sustainable and repeated use (as a tool that can be refined repeatedly to meet MBTA’s current needs). MBTA must submit a complete and final version (not in-progress). 3. Engage peer RTAs to incorporate new strategies and best practices. This will allow MBTA the opportunity to secure, review, and discuss their Recruiting and Hiring Plans with like organizations and identify opportunities to strengthen the development of their Recruiting and Hiring Plan now and in years to come. 4. All affected functional areas (director level or above) and the General Manager must review and approve the Recruiting and Hiring Plan to ensure that the Recruiting and Hiring Plan meets

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			<p>MBTA needs and priorities. This approval must occur prior to submission to FTA. MBTA must submit documentation of this review and approval to FTA.</p> <p>5. Provide status updates during the biweekly meetings. This provides an opportunity to address any questions or concerns MBTA may have regarding the Final Recruiting and Hiring Plan Draft as well as the opportunity for FTA to provide guidance. Workforce management and organizational development leadership supporting or consulting on the development of the Recruiting and Hiring Plan must attend these meetings. No deliverables are required to be submitted in advance.</p>
	9. Finalize 5-year hiring plan	Original: 1/15/24 Proposed: 8/30/24	Approved.
SD 22-9, CAP FTA-22-9-MBTA-CAT1-3			
<p><u>Finding:</u> Additional resources are needed to support MBTA’s safety engineering and safety certification process for capital projects.</p> <p><u>Required Action:</u> 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.</p>	7. Update Policy	Original: 10/6/23 Proposed: 11/6/23	Approved.
	8. Workforce Assessment	Original: 12/8/23 Proposed: 1/12/24 Extended: 2/10/24	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time to align its work with the revised first draft of the WFA due 2/10/24.
	9. Develop Training Materials	Original: 12/31/23 Proposed: 1/31/24 Extended: 2/29/24	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time to align with Action Item 8 above.
	10. Recruitment and Hiring Plan	Original: 1/31/24 Proposed: 2/29/24	Approved.

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Finding and Required Action	Proposed CAP Items	Due Dates	FTA Comments
SD 22-9, CAP FTA-22-9-MBTA-CAT1-4			
<p><u>Finding:</u> MBTA requires additional oversight of contractor work sites.</p> <p><u>Required Action:</u> FTA recommends that MBTA review the inspection and resident engineering resources needed to ensure compliance with MBTA safety rules related to the Right of Way to ensure the safety of personnel while in active work zones through additional staffing, contractor resources, or a combination of approaches.</p>	9. Gap Analysis of Current MBTA Staff and Contractors	Original: 11/10/23 Proposed: 1/19/24	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time to align with the first draft submittal of the WFA and SRA.
SD 22-11, CAP FTA-22-11-MBTA-CAT3-3			
<p><u>Finding:</u> MBTA management has not effectively communicated clear direction to frontline employees on what to report and what not to report through the Safety Hotline.</p> <p><u>Required Action:</u> 3.A: MBTA must expedite the development of an effective ESRP as a fundamental source of safety information for hazard identification and safety performance monitoring.</p> <p>3.B: As part of the development of an effective ESRP, MBTA must provide explicit direction to frontline employees on what to report and what not to report through the ESRP (including the safety hotline).</p> <p>3.C: As part of the development of an effective ESRP, MBTA must provide refresher training to stakeholder personnel on the role of employee safety reporting within SMS and the crucial contribution</p>	8. Assess and Document Service Request Process	Original: 10/31/23 Proposed: 12/1/23	Approved.
	9. Promote ESRP Reporting Criteria	Original: 12/15/23 Proposed: 1/17/24	Approved.
	10. Promote ESRP Successes and its Role in the Hazard Management Process	Original: 12/15/23 Proposed: 1/17/24	Approved.

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managers and supervisors play in the development of an effective safety reporting context.			
SD 22-11, CAP FTA-22-11-MBTA-CAT3-2			
<p><u>Finding:</u> MBTA has not documented explicit and formal provisions to ensure the participation of frontline employees in local safety committees as part of their job responsibilities in relation to the agency’s SMS.</p> <p><u>Required Action:</u> 2.A: MBTA must develop explicit and formal guidelines for the expected role and contribution of frontline employees to the local safety committee meetings.</p> <p>2.B: MBTA must develop instructions for the conduct of the meetings, including explicit departmental accountabilities for meeting outcome information capture, communication and follow up.</p>	6. Review Job Descriptions	Original: 10/20/23 Proposed: 11/10/23	Approved.
	7. Promote Local Safety Committee Participation	Original: 10/20/23 Proposed: 11/17/23	Approved.
SD 22-11, CAP FTA-22-11-MBTA-CAT3-1			
<p><u>Finding:</u> MBTA has not established explicit and formal provisions to ensure safety information from safety committee results in a consistent outcome of documented, prioritized, and actionable safety information.</p> <p><u>Required Action:</u> 1.A: MBTA must develop and describe, in the organization's SMS</p>	11. Establish Unified Documentation Process	Original: 10/20/23 Proposed: 11/17/23	Approved.
	12. Establish Guidelines for Meetings	Original: 10/20/23 Proposed: 11/17/23	Approved.
	13. Identify and Train Facilitators	Original: 11/20/23 Proposed: 12/20/23	Approved.

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<p>documentation, instructions regarding the conduct, recording, communication and follow up of the outcome consensus decisions specific for each of the following meetings - taking into consideration the nature (strategic or tactical) of each meeting:</p> <ul style="list-style-type: none"> • Operations and Safety Biweekly call (currently every other Friday) • Operations and Safety weekly meeting (currently on Wednesdays) • Executive Safety Committee (ESC) • Safety Management Review Committee (SMRC) • Safety Management Working Groups (SMWGs) • Data Analysis Group (DAG) • Local Safety Committee Meetings • Joint Labor/Management Safety Committee (required by Bipartisan Infrastructure Law) <p>1.B: In support of the above, MBTA must develop and describe, in the organization's SMS documentation, a formal mechanism and associated guidelines to ensure that the meetings are consistent in the identification and analyses of safety concerns and hazards; prioritization of safety risks; implementation of corrective actions; and safety risk mitigation effectiveness monitoring.</p>	<p>14. Implement Unified Documentation Process</p>	<p>Original: 12/20/23 Proposed: 1/19/24</p>	<p>Approved.</p>

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Finding and Required Action	Proposed CAP Items	Due Dates	FTA Comments
SD 22-12, CAP FTA-22-12-MBTA-CAT4-4			
<p><u>Finding:</u> Technical training for operations and maintenance departments is under-resourced and decentralized, without sufficient resources and direction, and relies significantly on on-the-job-training (OJT) which is informal and lacks oversight. Emergency response training is poorly integrated into overall training program.</p> <p><u>Required Action:</u> 4.A: MBTA must conduct a training needs assessment for rail transit operations and maintenance departments, to include emergency response training. This assessment should identify training that needs to be updated, developed, and supported with additional resources.</p> <p>4.B: MBTA must implement the results of the training needs assessment.</p> <p>4.C: MBTA must consider opportunities and adopt technology and other resources to support training development and training management and record-keeping.</p>	7. Establish a schedule for implementation of the proposed opportunities for Operations Training	Original: 10/1/23 Proposed: 1/12/24 Extended: 2/10/24	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time to align with the DRAFT due date of the WFA and SRA, 2/10/24.
	8. Resource Assessment and hiring plan incorporation	Original: 1/3/24 Proposed: 4/30/24 Extended: 5/10/24	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time with the FINAL due date of the WFA and the SRA, 5/10/24.
	9. Develop and formalize content for Operations Training	Original: 2/1/24 Proposed: 5/17/24	Approved.
	12. Develop a plan for centralized training governance	Original: 7/1/23 Proposed: 11/15/23 Extended: 12/29/23	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time for additional development of the plan.
	13. Training Plan Development	Original: 5/1/24 Proposed: 7/1/24	Approved.
	14. Develop and document process for updating training plans	Original: 1/1/24 Proposed: 7/1/24	Approved.
	15. KPI Metrics	Original: 5/1/24 Proposed: 7/1/24	Approved.
SD 22-12, CAP FTA-22-12-MBTA-CAT4-5			
<p><u>Finding:</u> MBTA lacks formal resource manuals in key maintenance areas and does not currently provide employees with checklists or other tools to support training</p>	6. Document maintenance/repair	Original: 10/31/23 Proposed: 11/21/23 Extended: 1/19/24	Approved. FTA is extending the proposed due date. FTA recommends that MBTA use the additional time to allow adequate development and incorporation time based on recent influx of changes on the ROW, Yards and Carhouses.

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<p>and implementation of maintenance rules and procedures.</p> <p><u>Required Action</u>: 5.A: In coordination with required actions already underway to address FTA’s Special Directive 22-7, the MBTA must review its existing maintenance rules and procedures; identify opportunities for tools and checklists to support employees in carrying out maintenance rules and procedures; and develop, distribute, maintain, and update these materials.</p> <p>5.B: MBTA must include frontline maintenance personnel in the development evaluation of these tools and checklists.</p>	instructions and verification tests		
	7. Update EAMS PMI procedures	Original: 12/31/23 Proposed: 1/19/24	Approved.
	8. Improve mobile EAMS functionality	Original: 1/31/24 Proposed: 2/21/24	Approved.
	12. Implement training	Original: 7/1/24 Proposed: 8/1/24	Approved.
	14. Establish process for maintenance and training program adjustments and wholesale review	Original: 6/30/24 Proposed: 7/31/24	Approved.
SD 23-12, CAP FTA-23-12-MBTA-CAT4-1			
<p><u>Finding 1</u>: Documented operating and maintenance rules and procedures are not implemented as required.</p> <p><u>Finding 2</u>: MBTA does not monitor operations, including the conditions of the operating environment, to identify the reasons for deviations between formal, established standards, rules and procedures, and actual operations and maintenance practices.</p> <p><u>Required Action 1</u>: 1.A: Each operating and maintenance department must establish a group to review department-wide</p>	3. Review & assess data sets	Original: 9/29/23 Proposed: 11/3/23	Approved.
	4a. Mockup possible data visualizations and review with key stakeholders	Original: 10/6/23 Proposed: 11/16/23	Approved.
	4b. Perform Gap Analysis on data	Original: 10/6/23 Proposed: 11/16/23	Approved.
	5. Develop data to demonstrate PPE compliance	Original: 12/1/23 Proposed: 2/9/24	Approved.

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<p>information on levels of non-compliance with key rules and procedures critical to the safety of activities performed by the department.</p> <p>1.B: Each department must establish and act on a prioritized list of most frequently violated rules and procedures with the most significant potential safety consequences.</p> <p>1.C: Each department must develop and implement approaches, which could include audits, use of checklists and guides, campaigns, and training, to improve compliance.</p> <p>1.D: Each department must report to the Safety Department monthly on its compliance with identified key rules and procedures critical to the safety of activities performed by the department.</p> <p>1.E: The Safety Department must review and audit these reports and compile a monthly compliance report for MBTA’s executive leadership team.</p> <p>1.F: Each department must continue to review safety data to assess effectiveness of actions and to improve compliance with safety rules and procedures.</p> <p><u>Required Action 2:</u> MBTA must develop, document, and communicate a mechanism to monitor operations, and provide training to stakeholder safety and operating personnel on this mechanism, to enable the analysis and understanding of situations of non-compliance.</p>	5a. Build dashboard/reporting on PPE compliance	Original: 10/20/23 Proposed: 12/15/23	Approved.
	5b. Socialize the dashboard/reporting	Original: 11/17/23 Proposed: 1/19/24	Approved.
	5c. Improve Dashboard	Original: 12/1/23 Proposed: 2/9/24	Approved.
	6. Establish feedback loop to Depts.	Original: 11/17/23 Proposed: 1/19/24	Approved.
	8. Feedback into the overall compliance process	Original: 1/31/24 Proposed: 2/15/24	Approved.
	9a. Determine prioritized rules categories for establishing compliance monitoring for select key rules	Original: 11/22/23 Proposed: 12/21/23	Approved.
	9b. Set goals and objectives	Original: 12/29/23 Proposed: 1/26/24	Approved.
	9c. Set cadence for review of progress toward goals	Original: 12/29/23 Proposed: 1/26/24	Approved.
	17. Mapping the existing rules governance	Original: 1/24/24 Proposed: 3/1/24	Approved.
	32. Review Safety Rules Compliance Program (SRCP)	Original: 2/23/24 Proposed: 3/22/24	Approved.

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	32a. Evaluate compliance best practices	Original: 11/10/23 Proposed: 1/23/24	Approved.
	32b. Review SRCP manual & documents	Original: 12/8/23 Proposed: 1/5/24	Approved.
	32c. Evaluate current SRCP governance	Original: 2/23/24 Proposed: 3/22/24	Approved.
	34. Evaluate creating digital forms	Original: 11/10/23 Proposed: 12/1/23	Approved.
	35. Pilot digitized forms	Original: 3/28/24 Proposed: 4/12/24	Approved.
April 18, 2023 IAL IAL-230418-WP-1-230605 Work Plan			
<u>Requirement:</u> Complete the development of a ROW rules compliance and safety work plan that sets forth corrective actions MBTA will take to improve compliance with ROW safety procedures and ensure motorperson awareness regarding the presence of workers on the ROW, based on review of near miss events, and the above required activities.	1.a.4. Onboard consultant	Original: 9/25/23 Proposed: 11/3/23	Approved.
	1.a.5. Industry Benchmarking	Original: 11/1/23 Proposed: 12/21/23	Conditionally approved. As a condition of approval, MBTA must provide a schedule for the industry benchmarking, to include which agencies are included in the benchmarking, when the engagements are scheduled for, and the format of the engagement. This must not be performed remotely and or solely by Contractors. Key stakeholders from the MBTA must be engaged.
	1.a.6. Select consultant recommendations	Original: 12/17/23 Proposed: 2/2/24	Approved.