

UNITED STATES DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

[Special Directive No. 24-3, Notice No. 1]

Special Directive Under 49 U.S.C. § 5329 and 49 CFR Part 670

Required Actions to Address Bus and Rail Transit Safety Issues Contributing to Safety Events at the Southeastern Pennsylvania Transportation Authority

AGENCY: Federal Transit Administration (FTA), U.S. Department of Transportation (DOT).

SUMMARY: FTA issues Special Directive 24-3 to direct the Southeastern Pennsylvania Transportation Authority (SEPTA) to address findings documented in FTA's Safety Management Inspection (SMI) report released on July 5, 2024. FTA conducted this SMI between August 10, 2023, and January 31, 2024, to assess an escalating pattern of safety incidents and concerns on SEPTA's rail transit and fixed-route bus transit system and to provide a roadmap to building a robust safety culture within the agency.

This Special Directive identifies 10 findings requiring actions that SEPTA must take to address bus and rail transit safety issues contributing to safety events.

FOR FURTHER INFORMATION CONTACT: For program matters, Mr. Joseph DeLorenzo, Associate Administrator for Transit Safety and Oversight and Chief Safety Officer, telephone (202)-366-1783 or joseph.delorenzo@dot.gov; for legal matters, Ms. Emily Jessup, Attorney Advisor, FTA, telephone 202-366-8907 or emily.jessup@dot.gov.

SUPPLEMENTARY INFORMATION:

SEPTA is a regional public transportation authority created by the Commonwealth of Pennsylvania that operates rail transit, fixed-route bus, commuter rail, and electric trolleybus and oversees paratransit services for nearly four million people in the City of Philadelphia and the four surrounding counties. SEPTA is the sixth largest public transit system in the United States by ridership, and the largest in Pennsylvania.

FTA's SMI reviewed the operations and maintenance of SEPTA's heavy and trolley rail transit system, including the Market Frankford Line (MFL) subway-elevated, the Broad Street Line (BSL) subway, the Norristown High Speed Line (NHSL), and SEPTA's six subway-surface trolley and two suburban trolley lines. The SMI also reviewed the operations and maintenance of SEPTA's 126-route bus system but did not address SEPTA's commuter rail system, contracted paratransit service, or trackless trolleybus transit mode.

The SMI assessed the identified causes and contributing factors for recent safety events, the effectiveness of SEPTA's safety training programs, the level and quality of supervision provided for safety-critical activities, and the safety impacts of an increasing number of assaults on workers for SEPTA's transit workers and passengers.

FTA published the SMI report on July 5, 2024. In the report, FTA issued a total of 16 findings and 24 required actions addressed to SEPTA in three categories:

1. Category 1 – Transit Worker Safety
2. Category 2 – Capacity of SEPTA’s System Safety Division and Control Center to Ensure Safe Operations
3. Category 3 – Bus and Rail Transit Safety Issues Contributing to Safety Events

This Special Directive addresses Category 3 and is based on FTA’s determination that critical elements of SEPTA’s bus and rail operations require more attention to ensure a rested and engaged workforce, adherence to safety rules and procedures, and sufficient training and qualification for SEPTA workers.

Finding 1. High Fatigue Environment for Rail and Bus Transit Workers

SEPTA faces a persistent shortage of transit workers, with its workforce 8-12% below budgeted levels in most districts and divisions.¹ This shortage prompts reliance on overtime and mandatory work assignments, called drafting, resulting in a fatigued workforce, especially among those in safety-sensitive roles such as vehicle operators, supervisors, control center staff, and maintenance personnel. The absence of reserve or relief personnel compounds the problem, as holidays, vacation, sick, and leave time are also covered with overtime, exacerbating the impacts of the staffing shortfall to 15-25% on some days in certain districts and divisions.

SEPTA's current Hours of Service (HOS) standards for rail and bus transit operations allow safety-sensitive personnel to work up to 16 hours with only eight hours off between shifts and no limits on consecutive workdays. These standards do not align with recommendations from the National Transportation Safety Board (NTSB) and the American Public Transportation Association (APTA), which suggest a minimum of ten hours between shifts and limits on consecutive workdays. A review of work schedules and interviews with frontline workers, supervisors, and managers reveals an exhausted workforce. Although SEPTA's 2023 HOS procedure is an improvement from the 2022 Agency Safety Plan (ASP), it still falls significantly short of industry recommendations.

To mitigate this situation, SEPTA has implemented measures such as cutting weekday bus service by 10% from 2019 to spring 2023 and reducing the number of trains on the Market-Frankford Line from 16 to 8-12 to balance vehicle availability and staffing limitations. SEPTA also implements a sophisticated work scheduling system that enforces HOS rules for bus and rail transit operators, and for other safety-sensitive workers, ensuring no one works over 16 hours per shift and receives at least eight hours off between shifts. This system offers SEPTA considerable control in how it schedules workers and manages overtime assignments.

However, despite these measures, FTA interviews with operations leadership and frontline workers indicate that SEPTA may still be overextending its resources and potentially compromising safety. FTA also finds that SEPTA does not implement industry-leading hours of service and fatigue management practices.

¹ Based on information provided at the time of the SMI.

Additionally, since SEPTA provides 24-hour bus service and maintenance, scheduling operators, supervisors, and maintenance workers does not always support human circadian sleep cycles or ensure predictable work and rest cycles. New operators are often left with overnight and/or swing (late) shifts, which are typically more challenging to operate from a safety perspective. These types of shifts also introduce a higher risk of operator fatigue and have limited supervisors available to support operators. Interviews with bus management indicated that reducing the number of late night shifts could potentially decrease the risk associated with fatigue issues.

As a result of its analysis, FTA concluded that SEPTA needs to review its policies and practices for managing the work hours and fatigue of safety-sensitive workers and make improvements in work scheduling. The Authority also must undertake a thorough analysis of bus and rail operator schedules to analyze the use and management of late and overnight shifts and their impacts on operators and operational safety to determine actions for improvement. SEPTA also should consider how its existing tools systems can support improvements in work scheduling that provide rail and bus operators and maintenance workers with predictable work and rest cycles that consider human circadian rhythms, as well as sleep and rest needs.

Finding 2. Ratio of Supervisors to Operators Creates Challenges in Overseeing Safety-Sensitive Activities in Passenger Service

SEPTA's operation supervisors oversee the safety of operators' day-to-day performance, ensuring they follow schedules, routes, safety rules, and Authority procedures. Supervisors conduct field observations and safety checks, respond to incidents and accidents, and resolve service issues, such as disabled vehicles or malfunctioning equipment. They review performance data, address customer complaints, and assist with operators' professional development.

With an approximate 15 to 25 percent supervisory shortage, depending on district and mode, SEPTA supervisors must prioritize responding to the most serious problems in service, may even have to operate in service, and may or may not have time for other duties. Supervisors also must spend time on secondary tasks, such as posting service notices, issuing citations to vehicles blocking the bus-only lanes, and working with the City Parking Authority to remove vehicles illegally blocking the bus-only lanes. These activities, while crucial for system service, take time away from working with new operators.

According to interviews at all levels of the organization, supervisor visibility in the field to manage the line, conduct bus operator onboard performance evaluations, work one-on-one with operators, and help deter security incidents by providing a uniformed presence and second SEPTA official on a vehicle or at a transit center, has been significantly limited by staffing challenges over the last few years. The impact of supervisor shortages is amplified during off-peak periods when there are fewer total staff across the transit system and when more new operators are providing service.

Without adequate supervisor staffing, the Authority struggles to maintain line-of-sight into frontline activities across sprawling service territories. This sparse coverage hamstrings SEPTA's ability to get ahead of safety risks before they materialize into incidents. Overburdened

supervisors cannot spearhead robust hazard identification, risk mitigation, operator coaching, rules compliance audits, performance evaluation, and other core safety management processes.

FTA finds that SEPTA must examine the adequacy of its ratio of supervisors to operators. Without sufficient levels of supervision, new operators with safety skill deficits and veteran operators with fading skills may not be proactively identified and coached before accidents occur. Enhanced levels of supervision also facilitate monitoring and coverage across operating shifts to catch safety potential issues unfolding in real-time. Supervisors also provide crucial command presence during major disruptions to guide emergency response. Rectifying current deficiencies is paramount for executing transit service delivery safely, reliably, and responsibly.

Finding 3. Training Program Does Not Ensure the Readiness of New Operators for Transit Service

Interviews and data reviews show that SEPTA does not have sufficient resources to complete core instructor duties, which include training new bus operator recruits, providing refresher training, recertification training, and remedial training, as well as provide regular trainee “on-vehicle” performance evaluations. The Bus and Rail Operations Training Group has 63 total instructors to provide initial and refresher training and performance evaluations for approximately 2,500 bus and rail operators. The Group has requested 40 additional hires to meet training demands. At the time of the SMI, 12 new positions had been approved.

Interviews revealed that, due to tight training scheduling, new operators may be released to revenue service before attaining full proficiency. While trainees receive their scheduled class time, there is no more time available if additional training is needed to help make them ready for service. Interviewees reported that some new operators are not confident in their ability to safely handle vehicles safely when leaving training. Interviews indicate that that with more time and resources to devote to these classes, SEPTA may be able to help some of these new operator trainees qualify for service and ensure the readiness of all passing operators for service. Additional obstacles for the Bus Training Department include a lack of locations to run training classes and the need to work with Operations to have buses available for trainees to use.

Additionally, the lack of instructors hampers opportunities for skills reinforcement, remedial education, and refresher courses to maintain operator qualifications over time. Evaluations to gauge training efficacy and pinpoint knowledge gaps are also minimized. This inability to support operators throughout their career amplifies safety risks.

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FTA finds that improvements to SEPTA's training program would address the deficiencies identified by the SMI.

Finding 4. SEPTA Does Not Conduct Regular Performance Evaluations for Transit Operators

SEPTA does not provide each operator with a formal performance evaluation each year to assess their skills and capabilities to safely operate a transit vehicle in service and to evaluate their knowledge of SEPTA's safety rules. SEPTA data shows that 34 percent of the major bus collisions the Authority experienced in 2023 involved operators with three or fewer years of experience. Of these collisions, 53 percent involved operators with less than one year of experience. Similarly, SEPTA data shows that 53 percent of major trolley collisions involved operators with three or fewer years of experience and 50 percent of those collisions involved operators with less than one year of experience.

After completing bus operator initial training, SEPTA bus and trolley operators must complete the CDL certification renewal every three years and complete annual refresher training. However, FTA's SMI team learned that SEPTA does not provide each operator with a formal performance evaluation each year to assess their skills and capabilities to safely operate a transit vehicle in service and to evaluate their knowledge of SEPTA's safety rules. Although SEPTA's annual trolley operator recertification program includes an evaluation of skills, FTA determined that SEPTA's trolley operations has no standardized practice for operator performance evaluations conducted yearly to assess their capabilities to safely operate a transit vehicle in service and to evaluate their execution of SEPTA's safety rules.

FTA finds that without recurring onboard evaluations of individual operators paired with coaching and skills development, deficiencies in following safety protocols, adherence to safety rules and quality standards, and overall safe operating skills may not be promptly identified and corrected. Regular performance evaluations for transit operators across all modes will improve operator safety and the safety of passenger service.

Finding 5. SEPTA Does Not Provide Sufficient Support to Help New Operators Manage SEPTA's Operating Environment and Perform Duties Safely

Interviews conducted during the SMI revealed that new operators at SEPTA, who lack seniority, often receive assigned shifts for late nights, overnights, and weekends. Trainees receive 16-23 days of on-road training, depending on the size of the district, all training occurs between noon and 10pm. Training exclusively during this time fails to prepare new operator trainees for overnight and weekend routes they will be operating. While significantly less service is provided on late nights and weekends, in 2023, 22 percent of SEPTA's 2023 major bus collisions occurred during evening and overnight off-peak weekday service, and 24 percent of major bus collisions occurred on weekends. This data also shows that in 2023, 41 percent of SEPTA's major bus collisions occurred during shifts where new bus operators likely were working.

Trainees receive 16-23 days of on-road training, depending on the size of the district, all training occurs between noon and 10pm. Training exclusively during this time fails to prepare new operator trainees for overnight and weekend routes they will be operating. Driving an unfamiliar route in the dark, often where there is insufficient lighting, makes it challenging to distinguish

street names and where to turn without proper experience navigating the distinct challenges across all shifts, new operators struggle to safely traverse their assigned service times.

Compounding this training gap is an absence of formal mentoring post-instruction to enable the refinement of skills critical for safe operations, ask questions and uphold safety standards. Interviewees indicated that SEPTA does not adequately invest in their skill development for safe operations or adherence to safety rules. With no functional mentoring program to facilitate regular contact and performance discussions after trainees enter service, deficiencies in adhering to defensive driving techniques, passenger sensitivity policies or other safe operating practices go undetected.

FTA finds that new operators must receive robust training catered to the routes they will service across all shifts paired with readily available coaching support from seasoned personnel. This coupling addresses inherent safety knowledge gaps that arise with limited exposure during onboarding.

Finding 6. Lack of Coordination and Prioritization on Intersection and Grade Crossing Safety and Detour Management

SEPTA trolleys and buses must navigate routes and roads that often present challenges for vehicles and traffic patterns. SEPTA's operating environment includes many poor visibility locations, unprotected pedestrian walkways, tight turn radii, inadequate warnings and traffic control devices at intersections and grade crossings, and narrow, parking-lined streets. Reviews of safety data, investigation reports and the results of interviews draw clear connections between unsafe road conditions and SEPTA's safety performance.

To support improvements in road traffic safety for trolley service, SEPTA's 2022 Agency Safety Plan explains that SEPTA "utilizes a programmed approach to implement grade crossing warning device improvements. These improvements are intended to standardize the rail-highway at grade warning systems and bring them into compliance with the Manual of Uniform Traffic Control Devices (MUTCD) and performed jointly between SEPTA and PennDOT."² Many SEPTA rail crossings and intersections have not yet been upgraded to incorporate recommended safety devices per the MUTCD.

Interviews and review of incidents and reports also demonstrate that SEPTA's bus system also faces several key challenges in providing safe and reliable service when the State, Philadelphia and regional partners plan detours and construction projects without proper coordination. Uncoordinated projects that route transit service without proper coordination led to haphazard changes that degrade reliability, rider access, public safety, and operator working conditions. FTA finds that SEPTA must work to ensure its Commonwealth and regional partners improve coordination on infrastructure and transportation planning processes.

² SEPTA 2022 ASP (current version for SEPTA's rail transit system), Under Chapter 10.5.1, Rail Transit -- subsection 10.5.1.1 Grade Crossings, Page 94 (of 270).

Finding 7. SEPTA Does Not Address Safety Impacts of Multimodal Certifications

SEPTA new-hire bus operators are assigned to a district³ before they complete training. SEPTA's Victory district provides both bus and trolley service. Existing operating agreements require new hires to receive training to operate buses and trolleys in this district. While this dual training and certification arrangement provides some operational flexibility for the Victory district, this requirement diverts operator and training resources away from where they could be more productively used to support safety training for dedicated bus or trolley operators. As a result of this requirement, SEPTA spends its limited time and resources training transit workers to operate trolleys who will only ever operate buses, or who, if drafted to operate trolley service, are uncomfortable doing so.

As of December 2023, SEPTA's Victory facility had a shortfall of over 40 operators in a division that requires about 360 operators. The requirement for dual certifications places additional strain on resources at Victory District, requiring bus operators to take time to recertify for trolley operation, and has resulted in rail operators reaching their hours-of-service limits when operating bus routes and/or needing extra training and recertification in bus operations.

FTA finds that a review of this dual training and certification requirement may alleviate resource constraints at the Victory District.

Finding 8. SEPTA Has Not Formalized Policies for the Safe Movement and Securement of Transit Vehicles in Rail Transit Maintenance Facilities

SEPTA requires workers to secure vehicles per Rail Division Rule 35, which states, "When leaving the control stand or operating cab, storing or otherwise leaving a train, vehicle or equipment unattended, the equipment must be adequately secured in accordance with the applicable procedures to ensure against undesired movement." The rule does not define "adequately secured" nor does it provide "applicable procedures." In addition, while the rulebook states on the cover that it applies to maintenance personnel, its focus is on operators.

Each SEPTA maintenance facility has distinct vehicle securement and movement practices displayed on facility bulletin boards that address the unique vehicles, infrastructure, and movement circumstance at each location. Document reviews and interviews identified the absence of formalized procedures for several other practices with safety implications: yard and shop movements; vehicle cannibalization; and blue flag/signal/cone.

Over the past three years SEPTA has experienced six runaway events, including an incident on July 27, 2023, which is under investigation by the NTSB, where a SEPTA trolley derailed at the intersection of Island Avenue and Woodland Avenue in Philadelphia, Pennsylvania, and struck a sport utility vehicle and the Blue Bell Inn. On the day of the accident, the trolley involved in the accident was undergoing maintenance at SEPTA's Elmwood maintenance facility. As part of this process, maintenance personnel rendered the trolley's air brakes inoperable to allow for the

³ SEPTA's City Transit Division is broken down into seven districts (Allegheny, Callowhill, Comly, Elmwood, Frankford, Midvale, and Southern) and Contract Operations. SEPTA's Suburban Transit Division contains two additional districts (Frontier and Victory) and Contract Operations.

manual repositioning of the trolley within the facility. Shortly before the accident, a shift foreman instructed a maintenance technician to reposition the trolley for temporary storage. However, apparently there was no indication (such as a tag or note) that the trolley's air brakes had been rendered inoperable and when the maintenance technician operated the trolley under its own power toward Island Avenue, he was unable to stop the trolley which led to the derailment.

Although SEPTA took several actions following this recent event, including developing a procedure for the movement of light rail vehicles in rail transit maintenance facilities, FTA finds that a procedure for the safe movement of heavy rail vehicles in rail transit maintenance facilities still needs to be developed and procedures need to be formalized.

Finding 9. Quality of SEPTA's Pre-Trip Inspection Process Is Inconsistently Monitored

SEPTA bus operators must perform pre-trip inspections of vehicles before beginning revenue service and during shift changes on route (Rule BDR-150) while pre-trip inspections for MFL/BSL are conducted in the yard-by-yard operations personnel who bring trains to platforms to be picked up by operators. Interviews and field observations at numerous locations revealed inconsistencies and a lack of clarity surrounding pre-trip inspection protocols, including the allotted time, and required procedures for conducting them. Further, during interviews, SEPTA's Bus Operations leadership and district management confirmed that while supervisors sometimes oversee pre-trip inspections in the yard, they do not have a formalized or scheduled compliance program to ensure workers perform quality and thorough pre-trip inspections.

At present, the approach focuses on correcting operators' mistakes as identified through random observations rather than allowing transit workers to demonstrate proficiency gained via training. To confirm proper application of training, SEPTA should evaluate pre-trip inspections on clearly defined metrics, documenting areas needing improvement and those indicating success. This would further hold workers accountable to carrying out thorough, efficient pre-trip inspections.

FTA finds that the lack of compliance monitoring for pre-trip inspections increases the likelihood of buses entering or continuing revenue service with defects that could result in a safety event. SEPTA must clarify pre-trip inspection standards for bus, trolley, and rail equipment. Formalizing a universal pre-trip inspection routine with standardized methods and durations and formal efficiency testing would promote consistency and quality in the performance of these critical inspections.

Finding 10. SEPTA Faces Numerous Challenges with the Performance of Its Radio System

Records reviews and interviews conducted during the SMI identified several safety events where poor radio quality contributed to the event and highlighted challenges with radio communication, including inconsistent coverage, bandwidth issues, and radio dead spots, that affect the safety of SEPTA's operations and ability to respond to emergency conditions. Although SEPTA representatives indicated that a capital program is underway to upgrade the radio system, they did not provide FTA with details regarding the dedicated funding or scope and timeframe of this project.

FTA finds that because numerous safety-critical functions, from workers calling onto the right-of-way, to safe management of detours and events in service, to safe communication during emergencies, depend on a functioning radio system, SEPTA must develop and action plan to address radio performance.

DIRECTIVE AND REQUIRED ACTIONS:

In accordance with 49 U.S.C. § 5329 and 49 CFR part 670, FTA directs SEPTA to take the following actions:

Category 3 – Bus and Rail Transit Safety Issues Contributing to Safety Events

Findings		Tracking #	Required Actions
Finding 1	High Fatigue Environment for Rail and Bus Transit Workers	FTA-24-3-001	Within 90 days of issuance of this report, SEPTA must develop an action plan and implementation schedule to conduct a comprehensive review of SEPTA's policies and practices for managing the work hours and fatigue of rail and bus operators and maintenance workers. This review must examine SEPTA's current hours of service requirements, overtime regulations, labor agreements, policies on secondary employment, as well as medical review and clearance policies and fatigue management strategies. It should also assess current SEPTA practices related to scheduling work hours and overtime for these workers. SEPTA must submit the review to FTA for review and approval. Within 30 days of FTA approval of the review, SEPTA must modify its work scheduling system to ensure it provides rail and bus operators and maintenance workers with predictable work and rest cycles that consider human circadian rhythms, as well as sleep and rest needs. The SEPTA must submit the action plan, implementation schedule and revised work scheduling protocols/system to FTA for review, approval, and implementation monitoring.
Finding 2	Ratio of Supervisors to Operators Creates Challenges in Overseeing Safety-Sensitive Functions in Passenger Service	FTA-24-3-002	Within 90 days of issuance of this report, SEPTA must assess the current ratio of supervisors to transit operators in its fixed-route bus, trolley, and heavy rail operations and submit the assessment to FTA for review and approval. Within 30 days of FTA approval of the assessment, SEPTA must develop an action plan to ensure adequate oversight for those transit operators performing safety-sensitive functions. SEPTA must submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.

Category 3 – Bus and Rail Transit Safety Issues Contributing to Safety Events

Findings		Tracking #	Required Actions
Finding 3	Training Program Does Not Ensure the Readiness of New Operators for Transit Service	FTA-24-3-003	Within 120 days of issuance of this report, SEPTA must conduct an analysis of the adequacy of training resources and submit to FTA for review and approval. Within 30 days of FTA approval of the analysis, SEPTA must develop an action plan and an implementation schedule to address deficiencies noted by FTA. The analysis must review resources available to ensure new operators are not released into revenue service before they are ready, that they are equipped to manage the service environment, completion of all required retraining for every operator who needs it, and completion of regularly scheduled performance evaluations for each operator. SEPTA must submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.
Finding 4	SEPTA Does Not Conduct Regular Performance Evaluations for Transit Operators	FTA-24-3-004	Within 120 days of issuance of this report, SEPTA must develop an action plan and implementation schedule to ensure that each bus and trolley operator regularly receives a performance evaluation focused on their ability to safely provide service. SEPTA must submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.
Finding 5	SEPTA Does Not Provide Sufficient Support to Help New Operators Manage SEPTA’s Operating Environment and Perform Duties Safely	FTA-24-3-005-1	Within 90 days of issuance of this report, SEPTA must provide an action plan and implementation schedule to provide training during all three shifts for new bus, trolley, and rail transit operators to work to ensure new workers’ familiarity of the unique safety environment present during each of the shifts. This training must provide the opportunity for new operators to drive and be evaluated under nighttime conditions and in locations where they may be operating

Category 3 – Bus and Rail Transit Safety Issues Contributing to Safety Events

Findings		Tracking #	Required Actions
			passenger service during their initial runs and routes. SEPTA must submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.
		FTA-24-3-005-2	<p>Within 120 days of issuance of this report, SEPTA must develop an action plan and implementation schedule for a bus operator new hire safety performance mentoring and coaching program to improve learning for all operators and focus on positive contact with new operators after onboarding. SEPTA must consider the following when developing this plan:</p> <ol style="list-style-type: none"> 1. Observations from instructors and/or operations leadership and supervision in coordination with SEPTA’s peer mentoring program to validate the training the transit worker has received and to support their comfort in their new role. 2. Expansion of the peer mentoring program to include input from Local 234 regarding the assigned peer mentors, and to provide an opportunity for the operator to meet with the peer mentor bi-weekly to cover a safety scenario or safety method and receive helpful coaching. <p>SEPTA must submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.</p>
Finding 6	Lack of Coordination and Prioritization on Intersection and	FTA-24-3-006-1	Within 45 days of issuance of this report, SEPTA must submit to FTA for review and approval a list of bus

Category 3 – Bus and Rail Transit Safety Issues Contributing to Safety Events

Findings		Tracking #	Required Actions
	Grade Crossing Safety and Detour Management		intersections and rail crossings that have had multiple accidents or incidents during the period 2018 through 2023 or have been determined to be at high risk for accidents. This list must include photographs and a summary of accident history for each location.
		FTA-24-3-006-2	Within 90 days of approval of the list developed in response to Required Action FTA-24-3-006-1 (Finding 6, Required Action 7 of the SMI), SEPTA must develop an action plan and schedule to review the list of identified bus intersections and rail crossings for potential traffic safety improvements to be coordinated with PennDOT and local jurisdictions. To the extent feasible, these reviews should take place in coordination with the appropriate PennDOT district office and the local jurisdictions. SEPTA must submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.
		FTA-24-3-006-3	Within 150 days after issuance of this report, SEPTA must prepare an action plan and schedule to conduct an analysis of how current service design puts operators in difficult or unsafe situations (e.g., narrow roads with on-street parking, tight turns that cause the bus to roll over curb frequently, transfer center that requires the operator to put the bus in reverse without a spotter, lack of appropriate facilities or adequate lighting at end-of-line points). The analysis must identify potential improvements in service design to be implemented directly by SEPTA or coordinated with PennDOT and local jurisdictions as appropriate. SEPTA must submit the action plan and schedule to FTA for review and

Category 3 – Bus and Rail Transit Safety Issues Contributing to Safety Events

Findings		Tracking #	Required Actions
			approval. SEPTA must submit the analysis for FTA review and acceptance. FTA will monitor implementation of the action plan and schedule, and subsequent analysis and improvements.
		FTA-24-3-006-4	Within 75 days after issuance of this report, SEPTA must develop an action plan and schedule to coordinate with city officials to develop a city construction detours management plan to reduce the impacts of construction detours on transit service. SEPTA must submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.
Finding 7	SEPTA Does Not Address Safety Impacts of Multimodal Certifications	FTA-24-3-007	Within 150 days of issuance of this report, SEPTA conduct an analysis of the bus and rail operator resources at the Victory District and determine impacts of multimodal certification for training, resources (vacancies), hours of service, safety incidents, and worker confidence in their ability to perform their job safely. SEPTA must submit the analysis to FTA for review and approval. Within 30 days of FTA approval of the analysis, SEPTA must develop an action plan to address the results of the analysis and submit the action plan and implementation schedule to FTA for review, approval, and implementation monitoring.
Finding 8	SEPTA Has Not Formalized Policies for the Safe Movement and Securement of Transit Vehicles in Rail Transit Maintenance Facilities	FTA-24-3-008	Within 120 days of issuance of this report, SEPTA must complete development of the Rail Equipment Engineering and Maintenance Department’s Standard Operating Procedures (SOP)/procedures for heavy rail and trolley vehicle securement and movement within and around rail transit maintenance facilities and ensure all transit workers

Category 3 – Bus and Rail Transit Safety Issues Contributing to Safety Events

Findings		Tracking #	Required Actions
			responsible for such vehicle movement are trained on and issued the appropriate SOPs/procedures. SEPTA must submit the revised procedure(s), training documentation, and evidence of training completion and SOP/procedure issuance to FTA for review, approval, and implementation monitoring.
Finding 9	Quality of SEPTA’s Pre-trip Inspection Process Is Inconsistently Monitored	FTA-24-3-009	Within 90 days of issuance of this report, SEPTA must develop an action plan and schedule to enhance training and supervision regarding the conduct of pre-trip inspections, including a validation tool to measure pre-trip efficiency with transit workers. SEPTA must submit the action plan and implementation schedule for FTA review, approval, and implementation monitoring, and the validation tool for FTA review, acceptance, and implementation monitoring.
Finding 10	SEPTA Faces Numerous Challenges with the Performance of Its Radio System	FTA-24-3-010	Within 120 days of issuance of this report, SEPTA must develop an action plan and schedule for radio enhancements to improve and monitor radio performance. This plan must include all intended capital projects to replace, repair, or upgrade radio system components. SEPTA must submit this plan and implementation schedule to FTA for review, approval, and implementation monitoring.

In accordance with the timeframes specified above, SEPTA must submit the required plans to FTA that demonstrate the specific actions SEPTA will take to address the required actions specified in this Special Directive and propose a milestone schedule for completing each activity; identify the responsible parties for each action and their contact information; and the verification strategy for ensuring the completion of required work.

FTA will review and approve (with revisions as necessary) SEPTA's plan(s) and will monitor SEPTA's progress in resolving each finding and required action. FTA will conduct scheduled meetings with SEPTA to review its progress until such time as FTA determines that these meetings are no longer needed or may be conducted with less frequency.

PETITIONS FOR RELIEF OR RECONSIDERATION

As set forth in 49 CFR § 670.27(d), SEPTA has 30 calendar days from the date of this Special Directive to petition for reconsideration with the FTA Acting Administrator. The petition must be in writing and signed by the SEPTA Accountable Executive or equivalent entity and must include a brief explanation of why SEPTA believes the Special Directive should not apply to it or why compliance with the Special Directive is not possible, is not practicable, is unreasonable, or is not in the public interest. In addition, the petition may include relevant information regarding the factual basis upon which the Special Directive was issued, information in response to any alleged violation or in mitigation thereof, recommend alternative means of compliance for consideration, and any other information deemed appropriate. Unless explicitly stayed or modified by the Acting Administrator, this Special Directive will remain in effect and must be observed pending review of a petition for reconsideration.

Within 90 days of receipt of the petition, the Acting Administrator will provide a written response. In reviewing the petition, the Acting Administrator shall grant relief only where SEPTA has clearly articulated an alternative action that will provide, in the Acting Administrator's judgment, a level of safety equivalent to that provided by compliance with this Special Directive. In reviewing any petition for reconsideration, the Acting Administrator shall grant petitions only where SEPTA has clearly articulated legal or material facts not in evidence at the time of this Special Directive.

ENFORCEMENT

FTA may take enforcement action for any violation of this Special Directive or the terms of any written plan adopted pursuant to this Special Directive in accordance with FTA's authorities under 49 U.S.C. § 5329, including but not limited to (1) directing SEPTA to use Federal financial assistance to correct safety deficiencies; (2) withholding up to 25 percent of financial assistance to SEPTA under 49 U.S.C. § 5307; and (3) issuing restrictions or prohibitions as necessary and appropriate to address unsafe conditions or practices that present a substantial risk of death or personal injury.

Issued on: July 5, 2024



Matthew J. Welbes
Executive Director
Federal Transit Administration
U.S. Department of Transportation