



U.S. Department  
of Transportation

**Federal Transit  
Administration**

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SENT VIA EMAIL**

August 22, 2024

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

**Subject: Response to Closeout Request for FTA-22-MBTA-CAT1-1 (Development of the Workforce Assessment)**

Dear Mr. Eng:

On August 9, 2024, the Massachusetts Bay Transportation Authority (MBTA) submitted a Corrective Action Plan (CAP) closeout request for FTA-22-MBTA-CAT1-1 (Managing the Impact of Operations, Maintenance, and Capital Project Requirements on the Existing Workforce). MBTA developed this CAP as part of its response to findings issued in Special Directive (SD) 22-9: Managing the Impact of Operations, Maintenance, and Capital Project Requirements on the Existing Workforce from the Safety Management Inspection (SMI) initiated by the Federal Transit Administration (FTA) in April 2022.

**Closeout Approval for FTA-22-MBTA-CAT1-1 (Development of the Workforce Assessment)**

MBTA's CAP for FTA-22-MBTA-CAT1-1 includes 12 action items, approved by FTA on October 21, 2022, to address the following SD 22-9 finding and required action:

- **Finding 1:** 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.
- **Required Action:** MBTA must conduct and submit to FTA a workforce analysis and associated workforce planning to include:
  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.
  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.

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.
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.

To implement this CAP, between October 1, 2022, and August 9, 2024, MBTA undertook the following CAP action items (and submitted documentation regarding their completion):

- Developed an advisory group to lead consultant engagement for the workforce assessment;
- Procured consulting services;
- Conducted a strategic planning session for CAP implementation with the advisory group;
- Onboarded a selected consultant;
- Established required activities and defined key terms;
- Prepared and reviewed the first draft of the workforce assessment;
- Established resource needs for mission-critical activities and current staffing capabilities for mission-critical activities;
- Prepared and reviewed the first draft of the safety risk assessment;
- Finalized the safety risk assessment;
- Conducted a final MBTA internal review and sign-off of the workforce assessment; and
- Presented the workforce assessment to the MBTA Board.

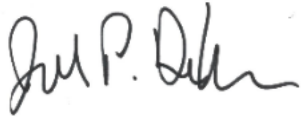
FTA carefully evaluated the submitted documentation and reviewed submissions with MBTA during biweekly meetings on SD 22-9 between October 2022 and August 2024.

**Based on review of these submissions, FTA finds that these completed action items adequately satisfy the requirements of FTA-22-MBTA-CAT1-1 and this CAP may now be closed.**

## **Conclusion**

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

Sincerely,

A handwritten signature in black ink, appearing to read "Joe P. DeLorenzo". The signature is fluid and cursive, with the first name "Joe" and last name "DeLorenzo" clearly distinguishable.

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

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