



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

November 22, 2024

Ms. Leslie S. Richards
General Manager/Chief Executive Officer
Southeastern Pennsylvania Transportation Authority
1234 Market Street, 10th Floor
Philadelphia, PA 19107

Subject: Action Plan and Implementation Schedule for Required Action FTA-24-3-009

Dear Ms. Richards,

Thank you and your team at the Southeastern Pennsylvania Transportation Authority (SEPTA) for submitting an action plan and implementation schedule addressing Required Action FTA-24-3-009 from Special Directive 24-3, "Required Actions to Address Bus and Rail Transit Safety Issues Contributing to Safety Events at SEPTA." The Federal Transit Administration's (FTA) issued this Special Directive as part of a Safety Management Inspection (SMI) of SEPTA and the Pennsylvania Department of Transportation (PennDOT). SEPTA submitted the documents, as required, on October 3, 2024.

Required action FTA-24-3-009 requires SEPTA to “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.”

Approval of Action Plan and Implementation Schedule for Required Action FTA-24-3-009

FTA has reviewed the action plan, implementation schedule, and supporting documents and approves SEPTA’s action plan and implementation schedule for FTA-24-3-009.

FTA finds that SEPTA’s submission demonstrates a comprehensive approach to improve pre-trip inspection training, supervision, validation, and compliance monitoring. The implementation schedule outlines clear timelines and responsible parties for each action item.

November 22, 2024

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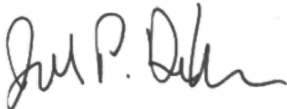
Conclusion

SEPTA should proceed with implementing the approved plan according to the provided schedule. FTA will monitor SEPTA's progress through regular updates and ongoing verification activities.

The attached Evaluation Matrix includes information on some of the verification activities FTA anticipates conducting as you implement your plan. These activities will allow FTA to comprehensively assess SEPTA's implementation of individual action items, ensuring they meet the commitments outlined in the action plan and implementation schedule. FTA may conduct additional verification activities as needed.

We greatly appreciate your commitment to the safety of the SEPTA system and its transit workers and passengers. Should you have any questions, please contact Francis Alomia, Special Directive Coordinator, at (470) 859-1677 or Francis.Alomia@dot.gov.

Sincerely,



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

Attachment: FTA-24-3-009 Action Plan and Implementation Schedule Evaluation Matrix

cc: Ms. Sarah Powell, Deputy Chief Transformation Officer – Safety Culture, SEPTA
Mr. Brad Okoniewski, Chief Safety Officer, SEPTA
Mr. David Hunter, Deputy Chief Safety Officer – Safety Management Systems, SEPTA
Mr. Erik Johanson, Senior Director of Budgets & Transformation, SEPTA
Ms. April Dorcak, Director of Regulatory Compliance, SEPTA
Ms. Julie Bender, Director of QA/QC & Interagency Coordination, SEPTA
Mr. Gino Benedetti, General Counsel, SEPTA
Ms. Meredith Biggica, Deputy Secretary for Multimodal Transportation, PennDOT
Ms. Elizabeth Bonini, State Safety Oversight Division Chief, PennDOT
Ms. Terry Garcia Crews, Regional Administrator, FTA Region 3
Mr. Tony Tarone, Deputy Regional Administrator, FTA Region 3
Mr. David Burns, General Engineer, FTA Region 3

**FTA-24-3-009 Action Plan and Implementation Schedule Evaluation Matrix
Special Directive 24-3: Required Actions to Address Bus and Rail Transit Safety Issues
Contributing to Safety Events at SEPTA**

Action Plan and Implementation Schedule Evaluation Matrix: Special Directive 24-3: Required Actions to Address Safety Issues at SEPTA					
<p>Finding 9: Quality of SEPTA's Pre-trip Inspection Process Is Inconsistently Monitored. Required Action 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.</p>					
Action Item Tracking No.	SEPTA Action Item	SEPTA Owner	SEPTA Deliverable	SEPTA Due Date	FTA Response
Area #1: Supervision & Validation					
FTA-24-3-009-01	Bus Operations: Validation and Supervision changes, as outlined in the action plan	Bus Operations	SOP Outlining New Process	1/31/2025	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review SOP outlining new process. • Review sample completed pre-trip inspection forms.
FTA-24-3-009-02	Rail Operations: Validation and Supervision changes, as outlined in the action plan	Rail Operations	SOP Outlining New Process	1/31/2025	<ul style="list-style-type: none"> • Conduct unannounced pre-trip inspection observations. • Interview operators, Transportation Managers (Supervisors), Vehicle Readiness Coordinators, and maintenance managers about pre-trip inspections. • Review incident reports to identify causal factors related to pre-trip inspections.
FTA-24-3-009-03	Data Collection & Digitization [(DCD)] Study (12-month study), beginning January 2025	Information Technology	DCD Study Report	1/31/2026	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum, review study results (or interim results) and the data collected.</p>
Area #2: Compliance Monitoring					
FTA-24-3-009-04	District Management and Location Safety Committee (LSC) Quarterly Compliance checks expanded to include City Trolley,	Bus Operations and Metro Rail	Inbound/Outbound CDL Vehicle Inspection Form for each location	12/31/2024	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review audit schedule and results. • Review completed CDL vehicle inspection forms. • Observe quarterly compliance checks.

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	[Norristown High Speed Line (NHSL) and Media-Sharon Hill Line (MSHL)]				<ul style="list-style-type: none"> Interview District Management and LSC members about quarterly compliance checks.
FTA-24-3-009-05	Rail Rule Compliance Manual Review + Update (re: pre-trip compliance check by Transportation Managers) – following annual review process	Metro Rail	(updated) Rail Compliance Manual	3/31/2025	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Review Rules Compliance Manual annual review results. Interview operators, Supervisors, and District Management about compliance checks. Confirm training is provided on the updated Rule Compliance Manual and its associated processes. Confirm process for future manual updates.
FTA-24-3-009-06	System Safety Quarterly (Random) Audit of pre-trip inspections	System Safety Division	System Safety Pre-Trip Inspection Audits (Spreadsheet)	4/30/2025	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Confirm the System Safety Division's target frequency or quota for quarterly pre-trip inspection audits, by mode. Review procedure for conducting quarterly audits, by mode. Review System Safety Division pre-trip inspection audit results (e.g., pre-trip inspection audits spreadsheet). Review sample non-compliance notifications provided to District Management.

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					<ul style="list-style-type: none"> • Interview System Safety Division personnel, District Management, and operators about quarterly pre-trip inspection audits.
Area #3: Training Enhancements					
FTA-24-3-009-07	Training Resources Assessment	System Safety Division	Training Assessment deliverable conducted by Slalom Consulting (and cross-walked with FTA-24-3-009)	11/30/2025	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review training resources workload assessment including: <ul style="list-style-type: none"> ○ Current staffing analysis. ○ Workload projections. ○ Gap analysis. ○ Recommendations with implementation timeline. • Interview System Safety Division, Training Department, and Human Resources personnel and contracted support about the workload assessment.
FTA-24-3-009-08	Annual Recertification Course	Training Department, Human Resources	Updated Recertification Curriculum for all modes	3/31/2025	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review updated recertification curriculum, by mode. • Confirm how the annual recertification course is delivered to ensure all staff who need the training can access it. • Confirm requirements for successful completion

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					of recertification training. <ul style="list-style-type: none"> • Interview System Safety Division, Training Department, and Human Resources personnel about the updated recertification curriculum and training timeline, including initial and annual recertification. • Monitor status of operator pre-trip inspection training (e.g., what percentage of operators have completed the enhanced recertification course).
FTA-24-3-009-09	New Training Videos	Training Department, Human Resources	New Training Videos	4/30/2025	Action Item Accepted To verify implementation, FTA will, at a minimum: <ul style="list-style-type: none"> • Review new training videos, by mode. • Review how the videos and the context within the video are used. • Confirm how the training videos are accessed and how completion of videos is confirmed. • Interview System Safety Division, Training Department, and Human Resources personnel about training video development and rollout.