



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

November 22, 2024

Ms. Meredith Biggica
Deputy Secretary for Multimodal Transportation
Pennsylvania Department of Transportation
Keystone Building
400 North St., Fifth Floor
Harrisburg, PA 17120

Subject: Approval of Action Plan and Implementation Schedule for Required Action FTA-24-4-002

Dear Ms. Biggica,

Thank you and your team at the Pennsylvania Department of Transportation (PennDOT) for submitting an action plan and implementation schedule addressing Required Action FTA-24-2-002 from Special Directive 24-4, "Required Actions to Ensure Sufficient Resources and Capabilities." The Federal Transit Administration (FTA) issued this Special Directive as part of a Safety Management Inspection (SMI) of the Southeastern Pennsylvania Transportation Authority (SEPTA) and PennDOT. PennDOT submitted the documents, as required, on October 25, 2024.

Required action FTA-24-4-002 requires PennDOT to develop and submit an action plan to oversee SEPTA's actions to expedite the closing of open corrective action plans (CAPs).

Approval of Action Plan and Implementation Schedule for Required Action FTA-24-2-002

FTA has reviewed the action plan, implementation schedule, and supporting documents and approves PennDOT's action plan and schedule for FTA-24-2-002.

FTA finds that the action plan demonstrates a comprehensive approach to addressing past challenges in CAP management, including insufficient safety verification data and extended timelines, through improved oversight mechanisms and accountability measures. The implementation schedule outlines clear timelines and responsible parties for each action item.

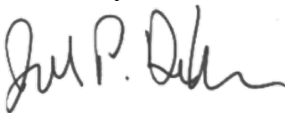
Conclusion

PennDOT should proceed with implementing the approved plan according to the provided schedule. FTA will monitor PennDOT'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 PennDOT'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 strong safety oversight for SEPTA's rail transit 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-24-4-002 Action Plan and Implementation Schedule Evaluation Matrix

cc: Ms. Elizabeth Bonini, State Safety Oversight Division Chief, PennDOT
Mr. J.M. McLaughlin, State Safety Oversight Regional Manager, 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-24-4-002 Action Plan and Implementation Schedule Evaluation Matrix
Special Directive 24-4: Required Actions to Ensure Sufficient Resources and Capabilities**

Action Plan and Implementation Schedule Evaluation Matrix: Special Directive 24 4: Required Actions to Ensure Sufficient Resources and Capabilities

Finding 2: PennDOT is Tracking Many Open SEPTA Corrective Action Plans (CAPs) from SSO Audits, Accidents/incidents, Hazards, SEPTA Internal Audits, and Other Sources with Extended Timelines Past Initial Due Dates

Required Action FTA-24-4-002: Within 60 days of issuance of this Special Directive, PennDOT must submit a prioritized CAP list and action plan for overseeing SEPTA actions to expedite the closing of open CAPs. At a minimum, the CAP action plan must include an updated CAP matrix with schedules and responsible parties and detailed explanations for any CAPs that will not be addressed within 12 months of the original due date. This prioritized CAP list and action plan must be submitted to FTA for review, approval, and implementation monitoring.

Action Item Tracking No.	PennDOT Action Item	PennDOT Owner	PennDOT Deliverable	PennDOT Due Date	FTA Response
FTA-24-4-002-01	PennDOT will require SEPTA to document a formalized internal CAP closure verification process.	J.M. McLaughlin	SEPTA CAP closure verification procedure	10/18/2024 (submitted)	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review submitted documentation to confirm: <ul style="list-style-type: none"> ○ Clearly defined roles and responsibilities. ○ Step-by-step verification procedures. ○ Documentation requirements for evidence. ○ Quality control measures. • Review sample CAP closure requests to verify adherence to new process. • Review rejection rates of CAP closure requests post-implementation. • Review new procedure training records.
FTA-24-4-002-02	PennDOT will monitor SEPTA CAP performance data to show improvement or maintained improvement.	J.M. McLaughlin	<p>Monthly performance report with SEPTA's CAP data, to include:</p> <ul style="list-style-type: none"> • # of Open Overdue CAPs • # of CAP closure requests with the SSOA • # CAP closure requests rejected due to lack of internal CAP closure verification • # of CAPs with original SSOA approval date of October 1, 2024 or later that will not be addressed within 12 months of the original due date. • # of Total Open CAPs • # of Total Closed CAPs 	On the 15 th of each month through December 2025, unless FTA requests additional reports	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Verify reports contain all required metrics, including: <ul style="list-style-type: none"> ○ Number of open overdue CAPs. ○ Number of CAP closure requests. ○ Number of rejected closure requests. ○ Number of CAPs exceeding 12-month timeline. ○ Total open/closed CAP counts. • Audit sample of reported metrics against source documentation.
FTA-24-4-002-03	PennDOT will establish targets for	J.M. McLaughlin	PennDOT will demonstrate progress towards its monthly	Updates provided in	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p>

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Finding 2: PennDOT is Tracking Many Open SEPTA Corrective Action Plans (CAPs) from SSO Audits, Accidents/incidents, Hazards, SEPTA Internal Audits, and Other Sources with Extended Timelines Past Initial Due Dates

Required Action FTA-24-4-002: Within 60 days of issuance of this Special Directive, PennDOT must submit a prioritized CAP list and action plan for overseeing SEPTA actions to expedite the closing of open CAPs. At a minimum, the CAP action plan must include an updated CAP matrix with schedules and responsible parties and detailed explanations for any CAPs that will not be addressed within 12 months of the original due date. This prioritized CAP list and action plan must be submitted to FTA for review, approval, and implementation monitoring.

Action Item Tracking No.	PennDOT Action Item	PennDOT Owner	PennDOT Deliverable	PennDOT Due Date	FTA Response
	monthly CAP closeouts		<p>CAP closure goals in the monthly performance report described in FTA-24-4-002-02.</p> <p>PennDOT's established targets for the number of CAPs closed are as follows:</p> <ul style="list-style-type: none"> • September to November 2024: 55 CAPs closed • December 2024 to February 2025: 34 CAPs closed • March to May 2025: 10 CAPs closed • June to August 2025 10 CAPs closed • September to November 2025: 3 CAPs closed • December 2025: 2 CAPs closed 	monthly report on the 15 th of each month through December 2025, unless FTA request additional reports	<ul style="list-style-type: none"> • Monitor PennDOT's progress against established closure targets, including comparing actual closures against periodic targets and reviewing justification for any variances. • Compare sample reported metrics to source documentation.
FTA-24-4-002-04	PennDOT will revise data fields in Vector Solutions to ensure both the original target completion date and extended target completion dates are tracked separately	E. Bonini	A screen shot of data field changes in Vector Solutions, PennDOT's database, showing the ability to track both the original target completion date and extended target completion dates.	9/30/2024 (submitted)	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review submitted screenshot evidence of system modifications. • Assess system capability to track original and extended completion dates and maintain history of changes. • Sample CAP records for proper date tracking.
FTA-24-4-002-05	PennDOT will	E. Bonini	Updated Program Standard	12/31/2024	Action Item Accepted

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Special Directive 24-4: Required Actions to Ensure Sufficient Resources and Capabilities**

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Finding 2: PennDOT is Tracking Many Open SEPTA Corrective Action Plans (CAPs) from SSO Audits, Accidents/incidents, Hazards, SEPTA Internal Audits, and Other Sources with Extended Timelines Past Initial Due Dates

Required Action FTA-24-4-002: Within 60 days of issuance of this Special Directive, PennDOT must submit a prioritized CAP list and action plan for overseeing SEPTA actions to expedite the closing of open CAPs. At a minimum, the CAP action plan must include an updated CAP matrix with schedules and responsible parties and detailed explanations for any CAPs that will not be addressed within 12 months of the original due date. This prioritized CAP list and action plan must be submitted to FTA for review, approval, and implementation monitoring.

Action Item Tracking No.	PennDOT Action Item	PennDOT Owner	PennDOT Deliverable	PennDOT Due Date	FTA Response
	develop revisions to the 2024 Program Standard in accordance with Pennsylvania State Safety Oversight Legislation regarding RTA leadership approvals for CAP target completion dates and CAP extension requests		section addressing leadership approvals for CAP target completion dates and CAP extension requests		<p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review submitted Program Standard revisions for: <ul style="list-style-type: none"> ○ RTA leadership approval requirements. ○ CAP extension request procedures. ○ Timeline requirements. • Review alignment with Pennsylvania State Safety Oversight Legislation. • Review documentation to confirm implementation of leadership approval process. • Review evidence of RTA leadership involvement in CAP process. • Monitor CAP extension requests for compliance with new procedures.
FTA-24-4-002-06	PennDOT will provide the SEPTA CAP matrix with schedules and responsible parties and detailed explanations for any CAPs that will not be addressed within 12 months of the original due date	E. Bonini	SEPTA CAP Matrix	SEPTA CAP Matrix provided monthly on the 15 th of each month through December 2025, unless FTA request additional reports	<p>Action Item Accepted</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review monthly matrix updates, including: <ul style="list-style-type: none"> ○ Current schedules. ○ Responsible parties. ○ Detailed explanations for extended timelines. • Review prioritization methodology implementation for risk-based prioritization and age-based sorting within risk categories. • Review sample of CAPs for accurate reporting. • Monitor trends in timeline extensions and completion rates. • Assess effectiveness of changes through trend analysis of: <ul style="list-style-type: none"> ○ CAP closure rates.

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Required Action FTA-24-4-002: Within 60 days of issuance of this Special Directive, PennDOT must submit a prioritized CAP list and action plan for overseeing SEPTA actions to expedite the closing of open CAPs. At a minimum, the CAP action plan must include an updated CAP matrix with schedules and responsible parties and detailed explanations for any CAPs that will not be addressed within 12 months of the original due date. This prioritized CAP list and action plan must be submitted to FTA for review, approval, and implementation monitoring.

Action Item Tracking No.	PennDOT Action Item	PennDOT Owner	PennDOT Deliverable	PennDOT Due Date	FTA Response
					<ul style="list-style-type: none"> ○ Extension request frequency. ○ Quality of closure documentation. ○ Timeline adherence.