



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

November 18, 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-24-1-004

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-24-1-004 from Special Directive 24-1: "Required Actions to Protect Transit Workers at SEPTA." The Federal Transit Administration (FTA) issued this Special Directive as part of a Safety Management Inspection (SMI) of SEPTA and the Pennsylvania Department of Transportation (PennDOT). SEPTA submitted documentation, as required, on October 18, 2024.

Required action FTA-24-1-004 directs SEPTA to develop an action plan and implementation schedule to ensure and continuously evaluate the capabilities of Qualified Protection Employees (QPEs) in setting up protections to provide transit worker safety in accordance with SEPTA's on-track safety program.

Separately, on October 31, 2024, FTA published the Rail Transit Roadway Worker Protection (RWP) final rule (49 CFR part 671). This final rule sets minimum standards for RWP program elements, including an RWP manual and track access guide; requirements for on-track safety and supervision, job safety briefings, good faith safety challenges, and reporting unsafe acts and conditions and near-misses; development and implementation of risk-based redundant protections for workers; and establishment of RWP training and qualification and RWP compliance monitoring activities.

Approval of Action Plan and Implementation Schedule for Required Action FTA-24-1-004.

FTA has reviewed SEPTA's action plan, implementation schedule, and supporting submissions and approves SEPTA's action plan and implementation schedule for FTA-24-1-004.

FTA finds that SEPTA's submission demonstrates a comprehensive approach to addressing roadway worker safety through improvements to its QPE program. The implementation schedule outlines clear timelines and responsible parties for each action item.

Please note that FTA's approval of SEPTA's action plan and implementation schedule addressing Required Action FTA-24-1-004 from Special Directive 24-1 does not constitute FTA approval of any procedure, practice, or requirement that may conflict with the RWP final rule's (49 CFR Part 671) requirements, which also apply to the content of the action plan.

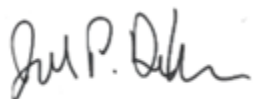
Conclusion

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-24-1-004 Action Plan and Implementation Schedule Evaluation Matrix

cc: Ms. Sarah Powell, Deputy Chief Transformation Officer – Safety Culture
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-24-1-004 Action Plan and Implementation Schedule Evaluation Matrix
Special Directive 24-1: Required Actions to Protect Workers at SEPTA**

Action Plan and Implementation Schedule Evaluation Matrix: Special Directive 24-1: Required Actions to Protect Workers at SEPTA					
<p>Finding 4: Qualified Protection Employees Need Additional Training and Routine Evaluation to Ensure Their Capabilities to Set Up Worker Protection Required Action FTA-24-1-004: Within 60 days of issuance of this report, SEPTA must conduct an analysis of training, qualification, and routine evaluations provided to Qualified Protection Employees and develop an action plan and implementation schedule to ensure and continuously evaluate the capabilities of Qualified Protection Employees in setting up protections to provide transit worker safety in accordance with SEPTA’s on-track safety program. SEPTA must submit the analysis, action plan and implementation schedule to FTA for review, approval, and implementation monitoring.</p>					
Action Item Tracking No.	SEPTA Action Item	SEPTA Owner	SEPTA Deliverable	SEPTA Due Date	FTA Response
FTA-24-1-004-01	Add role play for proper radio procedures	Training Department	<ul style="list-style-type: none"> • QPE Book of Rules Certification Presentation • 2-Day QPE Recertification Presentation 	10/1/2023 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review QPE Book of Rules Certification Training Presentation – Role Play with Radio and Form W (8/2024) and 2-Day QPE Recertification Presentation – Role Play with Radio and Form (8/2024). • Observe QPE 10-day training and 2-day recertification role plays with radio and Form W. • Review Form Ws completed by QPEs for work protection. • Review any safety or near-miss incidents involving QPE performance and Form Ws.
FTA-24-1-004-02	Add role play for Job Briefings in Certification and Recertification	Training Department	<ul style="list-style-type: none"> • QPE Book of Rules Certification Presentation • 2-Day QPE Recertification Presentation 	8/12/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review QPE Book of Rules Certification Training Presentation – Job Briefing Role Play Activity (8/2024) and 2-Day QPE Recertification Presentation – Job Briefing Role Play Activity (8/2024). • Observe QPE 10-day training and 2-day recertification role plays for job safety briefings. • Observe QPEs performing job safety briefing at work sites. • Review any safety or near-miss incidents involving QPE performance and job safety briefings.

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Action Item Tracking No.	SEPTA Action Item	SEPTA Owner	SEPTA Deliverable	SEPTA Due Date	FTA Response
FTA-24-1-004-03	Expand the QPE yearly recertification class from a one-day to a two-day training	Training Department	2-Day QPE Recertification Presentation	8/28/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Review 2-Day QPE Recertification Presentation (8/2024). Observe 2-Day QPE Recertification Training.
FTA-24-1-004-04	Update Training PowerPoint presentations 2024	Training Department	<ul style="list-style-type: none"> QPE Book of Rules Certification Presentation 2-Day QPE Recertification Presentation 	8/28/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Review QPE Book of Rules Certification Presentation (8/2024) and 2-Day QPE Recertification Presentation (8/2024). Observe 10-Day QPE Certification and 2-Day QPE Recertification Training.
FTA-24-1-004-05	Update Training Lesson Plans	Training Department	<ul style="list-style-type: none"> 10-Day QPE Certification Course Lesson Plan 2-Day QPE Recertification Course Lesson Plan 	8/9/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Review updated training lesson plans for 10-Day QPE Certification and 2-Day QPE Recertification Training. Observe 10-Day QPE Certification and 2-Day QPE Recertification Training.
FTA-24-1-004-06	Update Training Quizzes and Exams	Training Department	LMS Exams and Quizzes	8/9/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Review updated training quizzes and exams. Review results and participant performance on quizzes and exams. Observe 10-Day QPE Certification and 2-Day QPE Recertification Training.

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FTA-24-1-004-07	Add role play for taking out Form Ws in Certification and Recertification	Training Department	<ul style="list-style-type: none"> • QPE Book of Rules Certification Presentation • 2-Day QPE Recertification 	10/1/2023 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review QPE Book of Rules Certification Training Presentation – Role Play with Radio and Form W (8/2024) and 2-Day QPE Recertification Presentation – Role Play with Radio and Form (8/2024). • Observe QPE 10-Day Training and 2-Day Recertification Training Role Plays with Radio and Form W. • Review Form Ws completed by QPEs for work protection. • Review any safety or near-miss incidents involving QPE performance and Form Ws.
FTA-24-1-004-08	Update work zone scenarios (in Class)	Training Department	QPE Certification Course Work Zone Practice Exercises– Instructor’s Packet	8/9/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review QPE Certification Course Work Zone Practice Exercises – Instructor’s Packet (8/2024). • Observe QPE 10-Day Training and 2-Day Recertification Training for Work Zone Scenarios. • Observe QPE work zone setup and management for conformance with requirements and scenarios.
FTA-24-1-004-09	Develop a flagging exercise in the field	Training Department	<ul style="list-style-type: none"> • 10-Day QPE Certification Course Lesson Plan • 2-Day QPE Recertification Course Lesson Plan 	8/9/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review Course Lesson Plan: QPE Rail Operating Rules and Physical Characteristics (7/30/2024) and Course Lesson Plan: QPE 2-Day

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					Recertification Course (7/2024). <ul style="list-style-type: none"> Observe QPE 10-Day Training and 2-Day Recertification Training for Flagging Exercise. Observe QPE flagging activity on the roadway.
FTA-24-1-004-10	Demonstrate how to give a Job Briefing properly (Student Participation)	Training Department	<ul style="list-style-type: none"> QPE Book of Rules Certification Presentation 2-Day QPE Recertification Presentation 	8/12/2024 (submitted)	<p>Action Item Approved</p> To verify implementation, FTA will, at a minimum: <ul style="list-style-type: none"> Review QPE Book of Rules Certification Training Presentation – Job Briefing Demonstration (8/2024) and 2-Day QPE Recertification Presentation – Job Briefing Demonstration (8/2024). Observe QPE 10-day training and 2-day recertification Job Safety Briefing Demonstrations. Observe QPEs performing job safety briefings at work sites. Review any safety or near-miss incidents involving QPE performance and job safety briefings.
FTA-24-1-004-11	Demonstrate how to properly set up Work Zones (Student Participation)	Training Department	<ul style="list-style-type: none"> 10-Day QPE Certification Course Lesson Plan 2-Day QPE Recertification Course Lesson Plan 	8/9/2024 (submitted)	<p>Action Item Approved</p> To verify implementation, FTA will, at a minimum: <ul style="list-style-type: none"> Review Course Lesson Plan: QPE Rail Operating Rules and Physical Characteristics (7/30/24) and Course Lesson Plan: QPE 2-Day Recertification Course (7/2024). Observe QPE 10-Day Training and 2-Day Recertification Training for Work Zone Set Up. Observe QPE activity on the roadway for proper

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					work zone set up.
FTA-24-1-004-12	Demonstrate how to receive a Form W (Student Participation)	Training Department	<ul style="list-style-type: none"> • 10-Day QPE Certification Course Lesson Plan • 2-Day QPE Recertification Course Lesson Plan 	8/9/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review Course Lesson Plan: QPE Rail Operating Rules and Physical Characteristics (7/30/2024) and Course Lesson Plan: QPE 2-Day Recertification Course (7/2024), • Observe QPE 10-Day Training and 2-Day Recertification Training for Student Participation on How to Receive a Form W. • Observe QPE activity on the roadway for Form Ws.
FTA-24-1-004-13	Develop an exercise demonstrating Train Approach Warning (TAW) with an Advance Watch Person	Training Department	<ul style="list-style-type: none"> • 10-Day QPE Certification Course Lesson Plan • 2-Day QPE Recertification Course Lesson Plan 	8/9/2024 (submitted)	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review Course Lesson Plan: QPE Rail Operating Rules and Physical Characteristics (7/30/2024) and Course Lesson Plan: QPE 2-Day Recertification Course (7/2024). • Observe QPE 10-Day Training and 2-Day Recertification Training Demonstrating TAW with an Advance Watch Person. • Observe QPE activity on the roadway implementing TAW with an Advance Watch Person.
FTA-24-1-004-14	Evaluate the feasibility of having the Suburban Division instructors	Training Department	Assessment report	3/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review written assessment report analyzing:

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	perform its 10-day QPE Certification training in its entirety at the Suburban Training Facility				<ul style="list-style-type: none"> ○ Current and proposed training locations and facilities. ○ Logistical considerations and constraints. ○ Cost-benefit analysis. ○ Impact on training effectiveness and efficiency. ● Verify that assessment included input from key stakeholders (training staff, operations, safety, etc.).
FTA-24-1-004-15	Include the instructor's name/ID number in LMS exam system	Human Resources	LMS exam system details	3/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> ● Observe LMS exam system to verify instructor fields are present. ● Review sample exam records to confirm instructor information is being captured. ● Review system documentation showing configuration changes.
FTA-24-1-004-16	Evaluate exam questions with an abnormally high failure rate	Human Resources	Evaluation of QPE exam questions	3/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> ● Review statistical analysis of QPE exam question performance data. ● Verify documented review of identified problem questions. ● Review recommendations for question revisions/improvements. ● Review implementation plan for exam updates.
FTA-24-1-004-17	Place the Hotspot information lists online	Maintenance of Way	Evidence of online posting	3/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p>

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Action Item Tracking No.	SEPTA Action Item	SEPTA Owner	SEPTA Deliverable	SEPTA Due Date	FTA Response
					<ul style="list-style-type: none"> • Assess online access to Hotspot lists. • Review process for updating online Hotspot information. • Review version control and change tracking mechanisms. • Sample worker access from various locations/devices.
FTA-24-1-004-18	Require the QPE to remain onsite at one location per recommendation	Maintenance of Way	New updated rules and procedures	3/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review updated rules and procedures documentation. • Sample field observations of QPE work zone practices. • Review job briefing documentation reflecting this requirement. • Review any supervisory and accountability measures to ensure QPEs remain onsite.
FTA-24-1-004-19	Clearly express the use of the Worker's Portable Warning Signal (OTS- 242, RDR-242) (OTS-508-speed distance table) in the On-Track book of rules and the QPE training presentation materials	Training Department	Updated PowerPoint presentation with additional information included	5/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review revised PowerPoint materials. • Review updated rules documentation. • Sample QPE training sessions focused on the Worker’s Portable Warning Signal. • Observations of deployment of Worker’s Portable Warning Signal in the field.

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Action Item Tracking No.	SEPTA Action Item	SEPTA Owner	SEPTA Deliverable	SEPTA Due Date	FTA Response
FTA-24-1-004-20	Evaluate the Individual Train Detection (ITD) rule and re-evaluate the conditions for use up to and including discontinuation	System Safety	Evaluation report	6/30/2025	<p>Action Item Approved</p> <p>FTA expects SEPTAs evaluation will include ensuring SEPTA's compliance with the new Rail Transit Roadway Worker Protection final (RWP) rule (49 CFR part 671).</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review evaluation report including: <ul style="list-style-type: none"> ○ Safety risk assessment and mitigation. ○ Industry benchmarking. ○ Historical incident analysis. ○ Alternatives analysis. • Review engagement with labor organizations on potential changes. • Discuss use of ITD with workers who have performed work using ITD. • Review use of ITD with SEPTA senior leadership. <p>Please note that this does not constitute FTA approval of any procedure, practice, or requirement that may conflict with the RWP final rule’s requirements.</p>
FTA-24-1-004-21	Amend the current rule (OTS-505) used to establish protection to place the approach warning sign first, followed by the Resume sign, and lastly, the Stop sign, to	Training Department	New updated rules and procedures	6/30/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> • Review revised rule documentation • Review updated training materials. • Conduct field observations of work zone setup practices. • Review communication/implementation plan for rule change.

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	enhance employee safety				<ul style="list-style-type: none"> Review rules compliance activities to support implementation of amended rule.
FTA-24-1-004-22	Evaluate and develop an implementation plan to ensure all trainees actively demonstrate all eight levels of protection that can be utilized by a QPE during practical exercises	Training Department	Training Department Evaluation and Implementation Plan	7/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Review Training Department evaluation and implementation plan. Verify updates to training curriculum and materials. Direct observation of QPE training practical exercises. Review documentation of trainee demonstration requirements.
FTA-24-1-004-23	Evaluate the number of attempts a participant may attempt to achieve a passing grade	Training Department/ Operations	Evaluation of QPE Training Attempts	10/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Review written evaluation including: <ul style="list-style-type: none"> Analysis of historical exam attempt data. Consideration of challenges with multiple trainings and attempts. Recommendations with justification. Review updated policies if changes implemented.
FTA-24-1-004-24	Implement a formal documented process to evaluate the performance and ability of QPE Instructors.	Training Department	Documented performance evaluation process	10/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> Review formal evaluation process documentation including: <ul style="list-style-type: none"> Evaluation criteria. Frequency requirements. Documentation methods.

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					<ul style="list-style-type: none"> ○ Follow-up procedures. ● Sample completed instructor evaluations. ● Review evaluator training/qualification requirements. ● Observe process for evaluating the performance and ability of QPE instructors.
FTA-24-1-004-25	Conduct workforce assessment for Training Department needs to fulfill required actions (training program and evaluation process).	Training Department	Workforce assessment for Training Dept re: QPE required actions	10/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> ● Review comprehensive assessment report including: <ul style="list-style-type: none"> ○ Current staffing analysis. ○ Workload projections. ○ Gap analysis. ○ Recommendations with implementation timeline.
FTA-24-1-004-26	Establish a formal program to provide periodic follow-up evaluations, including proficiency testing, of the QPE's capabilities to establish the proper worker protections	System Safety	New audit checklists and procedures	10/31/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> ● Review new evaluation procedures and checklists. ● Sample completed QPE field evaluations. ● Review evaluation tracking system/database. ● Conduct field observation of evaluation process.
FTA-24-1-004-27	Evaluate the recruiting/hiring process for QPE-qualified Instructors to make the position more attractive	Training Department	Evaluation Report	11/30/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> ● Review evaluation report analyzing: <ul style="list-style-type: none"> ○ Current recruitment challenges. ○ Compensation analysis.

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Special Directive 24-1: Required Actions to Protect Workers at SEPTA**

Action Plan and Implementation Schedule Evaluation Matrix: Special Directive 24-1: Required Actions to Protect Workers at SEPTA					
<p>Finding 4: Qualified Protection Employees Need Additional Training and Routine Evaluation to Ensure Their Capabilities to Set Up Worker Protection Required Action FTA-24-1-004: Within 60 days of issuance of this report, SEPTA must conduct an analysis of training, qualification, and routine evaluations provided to Qualified Protection Employees and develop an action plan and implementation schedule to ensure and continuously evaluate the capabilities of Qualified Protection Employees in setting up protections to provide transit worker safety in accordance with SEPTA’s on-track safety program. SEPTA must submit the analysis, action plan and implementation schedule to FTA for review, approval, and implementation monitoring.</p>					
Action Item Tracking No.	SEPTA Action Item	SEPTA Owner	SEPTA Deliverable	SEPTA Due Date	FTA Response
	to viable candidates				<ul style="list-style-type: none"> ○ Qualification requirements. ○ Recommended improvements. ● Review implementation plan for approved changes.
FTA-24-1-004-28	Evaluate the feasibility of developing a dedicated QPE department	Maintenance of Way	Evaluation Report	11/30/3025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> ● Review comprehensive feasibility study including: <ul style="list-style-type: none"> ○ Organizational structure analysis. ○ Cost-benefit analysis. ○ Implementation requirements. ○ Risk assessment. ● Review stakeholder engagement documentation.
FTA-24-1-004-29	Collaborate with the SEPTA training group and System Safety Division on the development and implementation of an audit certification class and a unified evaluation document to be utilized by all groups performing audits/compliance checks	Training Department and System Safety	New evaluation documents	11/30/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> ● Review new evaluation documents and procedures. ● Review audit certification training curriculum. ● Sample completed unified evaluations. ● Verify certification tracking system.
FTA-24-1-004-30	Evaluate the utility and feasibility of a “middle-ground” QPE course	Training Department and System Safety	Evaluation Report	11/30/2025	<p>Action Item Approved</p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> ● Review evaluation report analyzing: <ul style="list-style-type: none"> ○ Training needs assessment.

**FTA-24-1-004 Action Plan and Implementation Schedule Evaluation Matrix
Special Directive 24-1: Required Actions to Protect Workers at SEPTA**

Action Plan and Implementation Schedule Evaluation Matrix: Special Directive 24-1: Required Actions to Protect Workers at SEPTA					
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Action Item Tracking No.	SEPTA Action Item	SEPTA Owner	SEPTA Deliverable	SEPTA Due Date	FTA Response
					<ul style="list-style-type: none"> ○ Resource requirements. ○ Cost analysis. ○ Implementation considerations. ● Review stakeholder input documentation. ● Review proposed curriculum if recommended.