

Corrective Action Plan (CAP) Evaluation Matrix Special Directive 22-4: FTA-TRA-25-004 CAP Rewrite (2/04/25)

Finding & Require Action

Finding 4: Management Practices

MBTA does not provide adequate time to complete necessary MOW maintenance activities.

Required Action:

MBTA must document its MOW maintenance needs and develop and implement a schedule to ensure adequate track access to meet maintenance requirements.

Revised MBTA Action Plan:

- The MBTA [will] develop definitions and break down its maintenance into preventative maintenance and inspection, corrective maintenance, emergency maintenance, and renewals. The MBTA will articulate a plan to quantify the access needed for each type of work and measure success against KPIs for each type of work.
 - **Preventative Maintenance:** The MBTA will define preventative maintenance and inspection schedules and approximate access time needed to perform. The MBTA will measure compliance with PM&I schedules as applicable.
 - **Corrective Maintenance:** The MBTA will analyze current EAMS defect data to understand volume of corrective maintenance and access time needed to perform. The MBTA will develop a methodology for tracking corrective maintenance backlog.
 - **Emergency Maintenance:** The MBTA will improve its access planning processes including definitions, timelines, and approvals for emergency access requests. The MBTA will track the volume of emergency maintenance requests and work to reduce.
 - **Renewals:** The MBTA will develop master plans by asset class which will articulate the state of good repair of assets within the asset class and necessary funding and access to deliver its renewal strategy. For MOW, the MBTA will also develop and [sic] interim solution ahead of master plan completion to facilitate CY25 access planning.
- The MBTA will leverage the work of other CAPs addressing the comments of Special Directive FTA-TRA-22.

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Evaluation Matrix

CAP Items/Action Items and Description	Proposed Start Dates	Proposed Due Dates	FTA Comments
Preventative Maintenance and Inspection			
1. Define current safety and system critical PM&Is requiring ROW access Provide list of all track, power, and signal safety and system critical PM&I schedules currently performed requiring ROW access.	12/02/2024	03/03/2025	FTA accepts this action item.
2. Calculate approximate ROW access time needed for PM&I Define types of access and timeframes needed to perform PM&I activities.	02/03/2025	05/01/2025	FTA accepts this action item.
3. Develop PMI digitization schedule Incorporate schedule for digitization of safety and system critical PM&Is and training for recording digital PM&I tasks into the Framework and Training developed under SD 22-12 Finding #5 corrective action plan.	12/02/2024	05/01.2025	FTA accepts this action item.
4. Develop Reporting Develop PM&I compliance reporting for digital safety and system critical PM&I schedules.	02/03/2025	07/01/2025	FTA accepts this action item.

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CAP Items/Action Items and Description	Proposed Start Dates	Proposed Due Dates	FTA Comments
<p>5. Identify additional preventive maintenance and inspection programs Provide a summary of all track, power, and signal additional PM&I programs in development, access required, and timelines for implementation including documentation and training requirements.</p>	03/03/2025	09/01/2025	FTA accepts this action item.
Corrective Maintenance			
<p>6. Quantify volume of corrective maintenance Quantify corrective maintenance needs based on defect data in the asset management system.</p>	01/02/2025	10/01/2025	FTA accepts this action item.
<p>7. Quantify access needed for corrective maintenance Develop an estimate of the access hours needed to complete corrective maintenance work. Review and revise estimates with input from maintenance staff.</p>	01/02/2025	02/02/2026	FTA accepts this action item.
<p>8. Develop KPI corrective maintenance backlog Develop KPIs to manage corrective maintenance backlog for assets requiring ROW access.</p>	07/01/2025	07/01/2026	FTA accepts this action item.

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Emergency Maintenance			
9. Revise policy for scheduling ROW work to include new emergency escalation process Complete revision of policy and SOP for scheduling work on the ROW and develop escalation process for approval of emergency access requests. Update training curriculum to reflect changes.	12/02/2024	06/02/2025	FTA accepts this action item.
10. Quantify emergency maintenance Develop a method to quantify instances of emergency maintenance access.	03/03/2025	06/02/2025	FTA accepts this action item.
11. Develop KPI for emergency maintenance Develop KPI to track trends in emergency maintenance.	06/02/2025	12/22/2025	FTA accepts this action item.
Renewals			
12. Develop Power SGR Strategy Complete planning for power asset classes to summarize current investment, additional investment need, and timeline to achieve SGR	12/02/2024	03/31/2025	FTA accepts this action item.
13. Develop Signals SGR Strategy Complete planning for signals asset classes to summarize current investment, additional investment need, and timeline to achieve SGR	02/03/2025	12/22/2025	FTA accepts this action item.

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14. Develop Track SGR Strategy Complete planning for track asset classes to summarize current investment, additional investment need, and timeline to achieve SGR	12/02/2024	12/22/2025	FTA accepts this action item.
15. Published CIP Provide published CIP showing alignments of funded projects with SGR strategies	12/02/2024	06/30/2025	FTA accepts this action item.
16. Deliver a diversion access planning strategy Develop a document that articulates the timelines, inputs, and prioritization process for ROW Diversion Planning at the MBTA.	12/02/2024	05/30/2025	FTA accepts this action item.
17. Develop a track access planning tool Formalize long-term process for establishing ROW access windows for track, power, signal renewal work.	12/02/2024	12/21/2026	FTA accepts this action item.
Renewals (MOW – Interim Plan)			
18. Quantify annual programmed maintenance Use asset attribute information and expected useful life data to develop an annual renewal need.	08/01/2024	02/03/2025	FTA accepts this action item.
19. Assign production rates Develop assumed production rates for each task and each access type.	09/02/2024	02/03/2025	FTA accepts this action item.

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<p>20. Develop the track maintenance access needs for CY25 Develop a proposal for a CY25 track access that will provide access needed to complete required maintenance work.</p>	08/01/2024	03/28/2025	FTA accepts this action item.
Track Access Reporting			
<p>21. Define track access data sources Establish process to gather source data and measure track access hours and productivity.</p>	08/01/2024	04/01/2025	FTA accepts this action item.
<p>22. Develop additional fields for reporting Update required data sources and forms to allow access to be better categorized and monitored for KPIs. Update documentation and training as required for form changes.</p>	01/02/2025	09/02/2025	FTA accepts this action item.
<p>23. Develop track access reporting Develop standardized reporting to monitor track access executed against baseline requirements.</p>	01/31/2025	12/22/2025	FTA accepts this action item.