

**FTA-24-3-001 Action Plan and Implementation Schedule Evaluation Matrix  
Special Directive 24-3: High Fatigue Environment for Rail and Bus Transit Workers**

**Action Plan and Implementation Schedule Evaluation Matrix: Special Directive 24 3: High Fatigue Environment for Rail and Bus Transit Workers**

**Finding 1:** High Fatigue Environment for Rail and Bus Transit Workers.

**Required Action FTA-24-3-001:** Within 90 days of issuance of this report, SEPTA must develop an action plan and implementation schedule to conduct a comprehensive review of SEPTA’s policies and practices for managing the work hours and fatigue of rail and bus operators and maintenance workers. This review must examine SEPTA’s current hours of service requirements, overtime regulations, labor agreements, policies on secondary employment as well as a medical review and clearance policies and fatigue management strategies. It should also assess current SEPTA practices related to scheduling work hours and overtime for these workers. SEPTA must submit the review to FTA for review and approval. Within 30 days of FTA approval of the review, SEPTA must modify its work scheduling system to ensure it provides rail and bus operators and maintenance workers with predictable work and rest cycles that consider human circadian rhythms, as well as sleep and rest needs. SEPTA must submit the action plan, implementation schedule and revised work scheduling protocols/system to FTA for review, approval, and implementation monitoring.

<b>Action Item Tracking No.</b>	<b>SEPTA Action Item</b>	<b>SEPTA Owner</b>	<b>SEPTA Deliverable</b>	<b>SEPTA Due Date</b>	<b>FTA Response</b>
FTA-24-3-001-1	Prepare a scope of work and procure a consultant to conduct a comprehensive review of SEPTA’s policies and practices for managing the work hours and fatigue of rail and bus operators and maintenance workers.	System Safety	Scope of Work and Consultant Procurement Documentation	03/31/2025	<p><b>Action Item Approved</b></p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> <li>• Verify scope of work includes comprehensive analysis requirements for all aspects of fatigue management (hours of service (HOS), scheduling, medical policies, etc.).</li> <li>• Review consultant qualifications to confirm expertise in transit operations, fatigue management, and labor relations.</li> <li>• Confirm contract includes clear deliverables, timelines, and reporting requirements aligned with subsequent action items.</li> </ul>
FTA-24-3-001-2	Comprehensive Review Phase 1: Complete a review of SEPTA policy, procedure, contracts, and current practices pertinent to fatigue risk management.	System Safety	Phase 1 Report	05/31/2025	<p><b>Action Item Approved</b></p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> <li>• Verify comprehensive review of current HOS program implementation, including compliance monitoring and exception handling.</li> <li>• Confirm analysis of all relevant collective bargaining agreements and work rules affecting fatigue management.</li> </ul>

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					<ul style="list-style-type: none"> <li>Review assessment of current medical qualification standards and monitoring programs.</li> <li>Verify evaluation of secondary employment policies and enforcement procedures.</li> <li>Review final report and observations.</li> </ul>
FTA-24-3-001-3	Comprehensive Review Phase 2: Complete a review of all applicable industry standards and guidelines and local, state, and federal regulations.	System Safety	Phase 2 Report	07/31/2025	<p><b>Action Item Approved</b></p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> <li>Verify review encompasses all applicable federal, state, and local regulations.</li> <li>Confirm analysis includes industry standards and recommended practices from the American Public Transportation Association and other relevant organizations.</li> <li>Review gap analysis between current SEPTA practices and regulatory requirements.</li> <li>Review final report and observations.</li> </ul>
FTA-24-3-001-4	Comprehensive Review Phase 3: Complete a review of industry best	System Safety	Phase 3 Report	11/30/2025	<p><b>Action Item Approved</b></p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> <li>Verify selection of appropriate peer agencies for comparison.</li> </ul>

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	practices, including peer review.				<ul style="list-style-type: none"> <li>Review documentation of peer agency practices and implementation approaches.</li> <li>Confirm analysis of best practices' applicability to SEPTA operations.</li> <li>Review final report and observations.</li> </ul>
FTA-24-3-001-5	Comprehensive Review Phase 4: Provide recommendations for implementation of fatigue risk management program.	System Safety	Phase 4 Report	03/31/2026	<p><b>Action Item Approved</b></p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> <li>Verify recommendations address all identified gaps and compliance issues.</li> <li>Review implementation requirements including resources, training, and change management.</li> <li>Confirm recommendations include clear performance metrics and monitoring procedures.</li> <li>Review cost analysis and budget implications.</li> </ul>
FTA-24-3-001-6	Develop an action plan and implementation schedule to apply any relevant findings of the Review to mitigate risks related to worker fatigue,	System Safety	Corrective Action Plan and Implementation Schedule	05/31/2026	<p><b>Action Item Approved</b></p> <p>To verify implementation, FTA will, at a minimum:</p> <ul style="list-style-type: none"> <li>Verify plan includes specific actions, responsibilities, and timelines.</li> </ul>

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	including implementations that may be made immediately and/or without bargaining.				<ul style="list-style-type: none"> <li>• Review separation of immediate implementation items from those requiring labor negotiations.</li> <li>• Confirm inclusion of monitoring procedures and progress metrics.</li> <li>• Review resource allocation and budget requirements.</li> </ul>