Corrective Action Plan (CAP) Evaluation Matrix
Special Directive 22-12: Operating Conditions and Policies, Procedures, and Training

Findings & Required Actions

Finding:

Finding 1: Documented operating and maintenance rules and procedures are not implemented as required.

Finding 2: MBTA does not monitor operations, including the conditions of the operating environment, to identify the reasons for deviations between formal, established standards, rules and procedures, and actual operations and maintenance practices.

Required Action:

CAP 1:

1.A: Each operating and maintenance department must establish a group to review department-wide information on levels of non-compliance with key rules and procedures critical to the safety of activities performed by the department.

1.B: Each department must establish and act on a prioritized list of most frequently violated rules and procedures with the most significant potential safety consequences.

1.C: Each department must develop and implement approaches, which could include audits, use of checklists and guides, campaigns, and training, to improve compliance.

1.D: Each department must report to the Safety Department monthly on its compliance with identified key rules and procedures critical to the safety of activities performed by the department.

1.E: The Safety Department must review and audit these reports and compile a monthly compliance report for MBTA's executive leadership team.

1.F: Each department must continue to review safety data to assess effectiveness of actions and to improve compliance with safety rules and procedures.

CAP 2:

MBTA must develop, document, and communicate a mechanism to monitor operations, and provide training to stakeholder safety and operating personnel on this mechanism, to enable the analysis and understanding of situations of non-compliance.

Action Plan

Accomplished under original CAPs 1 & 2:

- MBTA developed and mapped a process to monitor the conditions of its operating environment which will keep operating Departments, the Safety Department and senior leadership informed and aware of the status of compliance, as well as any trends on non-compliance.
- MBTA developed a tool that will aid in evaluation of any rules, procedures and policies for Operations and Maintenance activities for safety critical activities.
- MBTA created working groups of all levels of employees, to assist in assessing and reviewing the most frequently violated rules.
- MBTA compiled a list of key rules and identified those most frequently violated, based on progressive discipline.
- Implemented a personal protection equipment (PPE) compliance pilot to establish and test the process/mechanism

Next steps under this CAP include:

- Replacing the Safety Rules Compliance Program (SRCP) with OTIP (Operational Testing and Inspection Program), a program MBTA will develop informed by Federal Railroad Administration (FRA) 49 CFR part 217, Railroad Operating Rules. Although rail transit systems are not required to comply with Part 217, the regulation describes a program of operational tests and inspections that can be leveraged by rail transit to address this required action. OTIP will seek to improve operational safety by providing the MBTA with processes to prevent non-compliance with operating rules, procedures, and policies. The program will seek to achieve this by proactively monitoring, tracking, and evaluating employee compliance with those requirements through a variety of measures including (but not limited to) audits, inspections, and observations. OTIP development will leverage work performed under action items from earlier versions of this CAP, such as internal assessments, industry benchmarking, and RCP (Rules Compliance Program) pilots; SME knowledge; and Part 217.
- Establishing new roles and responsibilities for all program participants.
- Revising and re-launching RCPs as Tests and Observations (T&Os), as needed.
- Assessing the needs for further OTIP rollouts within Operations after the light rail and heavy rail programs are launched and evaluated.

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Evaluation Matrix

CAP Number	Proposed CAP Items *Actionable Items*	Proposed Start Date	Proposed Due Date *(Est End)*	FTA Comments
FTA-25-12-MBTA-CAT4-1	**OTIP for Light Rail**			
	1. Develop New OTIP Manual Leverage industry best practices and internal assessment to write a new Operational Testing and Inspection Program (OTIP) to replace the Safety Rules Compliance Program (SRCP) for rail service delivery. The OTIP Program will be based on Part 217. This manual will outline the overarching program governance and principles. *Addresses FTA Required Action 1.A, 1.B, 1.C, 1.E, 1.F, and 2.0*	6/4/24	1/21/25	**Action Item Approved**
	2. Finalize OTIP Audits Review and update existing SRCP documents/audit procedure forms into OTIP procedure forms. Design & develop digital audits and associated audit procedure documents for individual audits. *Addresses FTA Required Action 1.C*	5/12/24	1/21/25	**Action Item Approved**
	3. Develop OTIP Dashboard Ensure OTIP digital audit data can be visualized to allow senior management to identify OTIP trends and escalate findings through reporting. *Addresses FTA Required Action 1.D, 1.F*	12/18/24	2/13/25	**Action Item Approved**
	4. Develop OTIP Operating Procedures Create Operating Procedures to guide OTIP participants and owners through the program execution and processes.	11/6/24	2/19/25	**Action Item Approved**

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CAP Number	Proposed CAP Items *Actionable Items*	Proposed Start Date	Proposed Due Date *(Est End)*	FTA Comments
	Addresses FTA Required Action 1.C, 1.D, 1.E, 1.F			
	5. OTIP Stakeholder Engagement Conduct stakeholder engagement to ensure alignment with OTIP. Ensure relevant personnel and departments understand their roles and responsibilities in the program	12/9/24	2/25/25	**Action Item Approved**
	6. Develop OTIP Training Develop training materials to qualify personnel to conduct audits. Training will be developed in accordance with MBTA Operations Training Instructional Program Design (See 22-7 CAP 3, Action Item 4).	2/26/25	3/27/25	**Action Item Approved**
	7. Train relevant staff Develop and execute training plan to ensure relevant staff are qualified to perform OTIP audits (Tests and Observations (T&Os)) under the new program.	3/31/25	4/24/25	**Action Item Approved**
	8. Launch OTIP program for Light Rail Communicate OTIP Launch and Objectives to relevant frontline staff and other stakeholders. *Addresses FTA Required Action 1.F*	5/1/25	5/28/25	**Action Item Approved**
	9. Review and adjust Integrate findings and feedback and update program as needed.	5/6/25	6/19/25	**Action Item Approved**
	OTIP for Heavy Rail – Blue Line			
	10. Conduct internal assessment of current testing, observations, and auditing processes	1/10/25	2/13/25	**Action Item Approved**

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CAP Number	Proposed CAP Items *Actionable Items*	Proposed Start Date	Proposed Due Date *(Est End)*	FTA Comments
	Document internal auditing processes related to Blue Line. Assess programs to be integrated into new OTIP Program. *Addresses FTA Required Action 1.C*			
	11. Update OTIP Manual Integrate Blue Line Heavy Rail into OTIP Manual previously created for Light Rail. *Addresses FTA Required Action 1.A, 1.B, 1.C, 1.E, 1.F, and 2.0*	3/7/25	4/9/25	**Action Item Approved**
	12. Finalize OTIP Audits Review and update existing Blue Line SRCP documents/audit procedure forms into OTIP procedure forms; design & develop digital audits and associated audit procedure documents for individual audits to be part of the Blue Line OTIP Program. *Addresses FTA Required Action 1.D, 1.F*	3/13/25	5/8/25	**Action Item Approved**
	13. Update OTIP Dashboard Update audits data to integrate heavy rail OTIP data. Senior management should be able to identify OTIP trends and escalate findings based on dashboard/reporting.	4/14/25	5/23/25	**Action Item Approved**
	14. Develop OTIP Operating Procedures Create Operating Procedures to guide OTIP participants and owners through the program execution and processes. *Addresses FTA Required Action 1.C, 1.D, 1.E, 1.F*	5/12/25	6/18/25	**Action Item Approved**
	15. OTIP Stakeholder Engagement Conduct stakeholder engagement to ensure alignment with OTIP. Ensure relevant personnel and departments understand their roles and responsibilities in the program.	12/9/24	6/2/25	**Action Item Approved**

CAP Number	Proposed CAP Items *Actionable Items*	Proposed Start Date	Proposed Due Date *(Est End)*	FTA Comments
	16. Develop/Update OTIP Training Create or update training materials to qualify personnel to conduct audits.	6/3/25	7/10/25	**Action Item Approved**
	17. Train relevant staff Develop and execute training plan to ensure relevant staff are qualified to perform OTIP audits (T&Os) on Blue Line.	7/7/25	8/7/25	**Action Item Approved**
	18. Launch OTIP program for Heavy Rail Communicate OTIP Launch and Objectives to relevant frontline staff and other stakeholders. *Addresses FTA Required Action 1.F*	7/23/25	8/13/25	**Action Item Approved**
Assess needs and rollout plans for other Operating Disciplines				
	19. Gather and Assess OTIP Feedback Collect initial OTIP feedback from relevant stakeholders. Evaluate and summarize findings from light rail and Blue Line OTIP. Ensure data is collected both qualitatively and quantitatively (using developed metrics).	8/1/25	8/19/25	**Action Item Approved**
	20. Assess workforce to support OTIP Labor model for personnel required to support OTIP across the authority; hire as needed. Assess workforce to support OTIP in its operational stage and determine the number of employees needed to successfully run the program long-term.	1/2/25	8/29/25	**Action Item Approved**
	21. Conduct Rules Assessment for Remaining Operations and Maintenance Depts.	6/9/25	8/21/25	**Action Item Approved**

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CAP Number	Proposed CAP Items *Actionable Items*	Proposed Start Date	Proposed Due Date *(Est End)*	FTA Comments
	Conduct SRM assessment of rules for sections of the rulebook related to Operating and Maintenance departments to establish a list of prioritized rules for monitoring. *Addresses FTA Required Action 1.B*			
	22. Develop Plan for OTIP Programs for other Operations Departments Develop plan to assess other Operations Departments needs for OTIP Program. Develop plan and roadmap based on findings to build OTIP to other HR Lines and operations and maintenance departments, as needed.	8/1/25	8/29/25	**Action Item Approved** FTA accepts this action item with the understanding that the plan developed by MBTA in Action Item 22 will be the roadmap to implementation of OTIP across <u>all</u> operational and maintenance departments, as stated in FTA Special Directive 22-12, Required Action 1.A (FTA-22-MBTA-CAT4-1.A).