



The Massachusetts Bay Transportation Authority

Corrective Action Plan (CAP)

FTA 23-10-MBTA-
CAT2-5

BACKGROUND

Overview: FTA issues Special Directive 22-10 to require the Massachusetts Bay Transportation Authority (MBTA) to address findings documented in FTA's Safety Management Inspection (SMI) report released on August 31, 2022. Conducted between April 14 and June 30, 2022, FTA's SMI reviewed the MBTA rail transit system management, operations, and maintenance programs. This Special Directive identifies six findings requiring action that the MBTA must take to enhance and expedite implementation of the agency's SMS, including the development of procedures, safety management training, safety risk assessment, and safety assurance activities to build the organization's capability to identify safety concerns and to prioritize action to mitigate safety risk.

PURPOSE

This Corrective Action Plan has been developed to address **Category 2 – Prioritization of safety management information**

FTA Finding

Prioritization of safety management information

- Finding 5: MBTA's safety risk assessment guidance as part of its Safety Risk Management is ambiguous and has led to confusion among stakeholders regarding their responsibilities and authorities, which has created delays in carrying out safety risk assessments activities.

FTA Required Action

- 5.A MBTA must develop and document criteria for conducting safety risk assessments consistent with the basic principles of safety management and the tenets of SMS as conveyed in FTA's SMS guidance materials.
- 5.B MBTA must develop explicit direction for the ownership of safety risk assessments among the Safety Department and the operating departments. Documentation must include providing explicit roles, responsibilities, and thresholds of authority of each department involved.
- 5.C MBTA must include in the above criteria directives to ensure that operating departments including subject matter expertise, own safety risk assessments, while safety officials provide support for safety risk assessments and reports on results to Executive Leadership for safety resource allocation priorities.
- 5.D MBTA must expand its policy of establishing a predefined schedule of safety risk assessment workshops and develop criteria attuned with the nature of hazard identification (i.e., as they are identified), to expedite safety risk assessments to support prioritization for resource allocation.

ANALYSIS AND RECOMMENDATIONS

Analysis

- MBTA has identified existing documentation and processes for conducting safety risk assessments, including the Safety Risk Management Standard Operating Procedure, which are based on the tenets of SMS. Training modules for the preparation for and facilitation of SRM workshops have been developed and completed, but confusion exists related to safety risk assessments, including responsibilities for conducting such assessments.
- MBTA has established criteria for determining safety risk priorities, but they have not been consistently applied, and some immediate safety risks have not been consistently subject to safety risk assessment workshops.

Recommendations

- MBTA will assess the agency's existing framework for prioritizing safety risks and conducting safety risk assessments and will expand the safety risk assessment criteria to include newly identified risks requiring an immediate formalized, documented safety risk assessment.



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- MBTA will review its existing framework for safety risk assessments to include roles, responsibilities, and thresholds of authority by department,
- MBTA will assess its safety risk assessment guidance to clarify roles, responsibilities, and thresholds of authority as well as ensure participants understand the process.

ACTION PLAN

Description: MBTA has onboarded a consulting firm to assist with implementation of SD 22-10 actionable items. Through an iterative, incremental process, MBTA will immediately increase the level of risk assessment activity while progressively refining roles, responsibilities, and risk assessment criteria in consultation with stakeholder departments.

PLAN STRUCTURE

#	Actionable Items	Description	Responsible Party ¹	Est Start ²	Est End ³
1	Establish CAP Advisory Group	Establish an advisory group of internal stakeholders to review and guide implementation of the corrective action plan.	QCOO: Katie Choe Safety: Ronald Ester	10/17/22	10/30/22 [A]
2	Strategic Planning Session	Conduct a strategic planning session for SD 22-10 Finding 5 CAP implementation with the advisory group identified in Actionable Item #1.	QCOO: Katie Choe Safety: Ronald Ester GM: Lynsey Heffernan	11/1/22	11/1/22 [A]
3	Procure Consulting Services	Issue RFP or Task Order for consulting services to evaluate the safety risk assessment process and incorporate changes into the Transit Safety Plan.	QCOO: Katie Choe Safety: Michael Catsos	11/16/22	12/22/22 [A]
4	Onboard Consultant	Onboard selected consultant.	QCOO: Katie Choe	12/23/22	2/17/23 [A]
5	Define Criteria for Safety Risk Assessments	Develop criteria for conducting safety risk assessments utilizing FTA's SMS guidance materials, to ensure the safety risk assessment process is applied to all hazards where mitigations or corrective actions are required. Document updated criteria in revised Safety Assessment Decision Tool.	QCOO: Katie Choe Safety: Mike Catsos	2/21/23	4/18/23 [A]
6	Develop Risk Assessment Schedule	Develop and implement a defined schedule for risk assessment activities allowing for both expedited need-based assessments and planned assessments to create a comprehensive body of risk information incorporating critical functions and processes. Distribute the schedule to impacted stakeholders. Required Action 5D: Risk Assessment Schedule	Safety	9/15/23	10/18/23

¹ In the event of personnel or departmental changes, responsibilities for actionable items shall transfer to the new leadership.

² Est Start – Estimated Start Date

³ Est End Estimated Completion Date



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7	Update Criteria for Safety Risk Assessments	Update safety risk assessment criteria for consistency with basic principles of safety management, tenets of FTA's SMS guidance materials and its comments on AI 5. Include sections on hazard identification and analysis, safety risk evaluation, and safety risk mitigation. Include criteria for elevation of safety management communications to executive leadership.	Safety: SMS Lead	10/19/23	12/1/23
8	Define Roles and Responsibilities	Specify safety risk assessment (SRA) roles, responsibilities, and thresholds of authority by department. Document these roles, responsibilities, and thresholds within the SRA criteria.	Safety: SMS Lead Operations	12/4/23	1/12/24
9	Workshop Criteria for Safety Risk Assessments	Workshop SRA criteria with impacted department stakeholders and senior leadership. Incorporate updates identified during the workshop(s), if any. Document formal endorsement of the SRA criteria by senior leadership. Required Action 5A: Risk Assessment Criteria Required Action 5B: Risk Assessment Roles Required Action 5C: Risk Assessment Subject Matter Expertise and Resource Allocation	Safety: SMS Lead Operations GM Office	1/16/24	2/28/24
10	Engage Stakeholders to Identify Gaps in Training	Convene a stakeholder engagement group from all affected areas to understand gaps in training materials and training methods.	Safety: SMS Lead Operations	2/29/24	3/27/24
11	Schedule and Deliver SRM Trainings	Provide direct training and guidance on safety risk assessment process based on results of the stakeholder engagements.	Safety: SMS Lead	3/28/24	5/15/24
12	Revise Transit Safety Plan	Incorporate into the Transit Safety Plan annual update modifications to the safety risk prioritization and safety risk assessment process.	Safety: SMS Lead	5/16/24	9/1/24
13	CAP Verification	Evaluate actionable items/deliverables before submission to FTA to confirm there is reasonable evidence that the findings and this required action have been resolved, considering the scope and performance measures.	QCOO Safety	7/1/24	10/15/24

COMPLETION DOCUMENTATION

Performance Metrics

- Revised safety risk prioritization process
- Revised safety risk assessment process, including expansion of the safety risk assessment criteria



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- Assigned roles, responsibilities, and thresholds of authority for safety risk assessments
- New training for safety risk assessment facilitators and workshop participants and track percentage of completion.

Verification

- Completed revisions to the Safety Risk Management Standard Operating Procedure
- Revised Transit Safety Plan

BUDGET/COST ESTIMATE

Overview: Costs for this corrective action plan include consulting services to support a comprehensive review of the safety risk management assessment process and incorporate changes into the Transit Safety Plan, revision of training materials, and implementation of new training for involved personnel.

Segment Code	Cost Estimate (\$)
Consultant engagement	400,000
Development of new and revised virtual training materials	100,000
30% Contingency	150,000
Total	650,000

CORRECTIVE ACTION PLAN COMMITMENT

Responsible Parties

Department ⁴	Name	E-mail	Signature
Safety	Michael Catsos <i>Director of SMS and Safety Oversight</i>	[REDACTED]	DocuSigned by: Michael Catsos F8538833750D44B...
Operations	Erik Stoothoff <i>Acting Chief Operating Officer</i>	[REDACTED]	DocuSigned by: Erik Stoothoff 420D662BD86D47B...
Workforce	Ahmad Barnes <i>Chief Workforce Officer</i>	[REDACTED]	DocuSigned by: Ahmad Barnes C905D70689224D6...
Finance	Mary Ann O'Hara <i>Chief Financial Officer</i>	[REDACTED]	DocuSigned by: Mary Ann O'Hara 3F02AECAC6884B1...
Information Technology	John Glennon <i>Chief Information Officer</i>	[REDACTED]	DocuSigned by: John R. Glennon 830151928334CF...
Procurement	Jeff Cook <i>Chief Procurement & Contract Administration Officer</i>	[REDACTED]	DocuSigned by: Jeff Cook C8238FF50D624B0...
General Manager's Office	Lynsey Heffernan <i>Assistant General Manager for Policy & Transit Planning</i>	[REDACTED]	DocuSigned by: Lynsey Heffernan 68022497BCF94B6...

⁴ Offices designated as supporting roles provide subject matter expertise to responsible parties during action development and are not directly responsible for delivery of actionable items listed above.



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Executive Leadership of Responsible Parties

<p>DocuSigned by: <i>Jeffrey D. Gonneville</i></p> <p>Jeffrey D. Gonneville MBTA Deputy General Manager</p>	<p>9/11/2023</p> <p>Date</p>
<p>DocuSigned by: <i>David Panagore</i></p> <p>David Panagore MBTA Chief Administrative Officer</p>	<p>9/8/2023</p> <p>Date</p>
<p>DocuSigned by: <i>Meredith Sandberg</i></p> <p>Meredith Sandberg MBTA Acting Chief of Quality, Compliance & Oversight</p>	<p>9/8/2023</p> <p>Date</p>
<p>DocuSigned by: <i>Dennis Lytton</i> ON BEHALF OF</p> <p>Ronald Ester MBTA Chief Safety Officer</p>	<p>9/8/2023</p> <p>Date</p>
<p>DocuSigned by: <i>Phillip Eng</i></p> <p>Phillip Eng MBTA General Manager & CEO</p>	<p>9/11/2023</p> <p>Date</p>