



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

November 15, 2024

Mr. Phillip Eng
General Manager
Massachusetts Bay Transportation Authority
10 Park Plaza
Boston, MA 02116

Subject: Response to Closeout Request for FTA-22-MBTA-CAT1-3 (Modification and Resourcing of MBTA's Safety Engineering and Safety Certification Processes)

Dear Mr. Eng:

On October 31, 2024, the Massachusetts Bay Transportation Authority (MBTA) submitted a Corrective Action Plan (CAP) closeout request for **FTA-22-MBTA-CAT1-3 (Modification and Resourcing of MBTA's Safety Engineering and Safety Certification Processes)**. The MBTA developed this CAP as part of its response to interim findings issued in Special Directive (SD) 22-9: Managing the Impact of Operations, Maintenance, and Capital Project Requirements on the Existing Workforce from the Safety Management Inspection (SMI) initiated by the Federal Transit Administration (FTA) in April 2022.

MBTA's CAP for **FTA-22-MBTA-CAT1-3** includes 12 action items, approved by FTA on October 21, 2022, to address the following SD 22-9 finding and required action:

- **Finding 3:** Additional resources are needed to support MBTA's safety engineering and safety certification process for capital projects.
- **Required Action:** MBTA must modify safety engineering and certification requirements for its capital projects and vehicle procurements and ensure they are addressed through additional Engineering and Maintenance (E&M) and Safety Department staffing, contractor resources, or a combination of approaches. This may be done as part of the workforce analysis in Finding 1, or as part of a separate initiative.

To implement this CAP, between October 1, 2022, and October 31, 2024, MBTA undertook the following CAP action items and submitted documentation regarding their completion:

- Developed an advisory group;
- Assessed short term staffing needs;
- Conducted a strategic planning session for CAP implementation with the advisory group;

- Procured consulting services;
- Onboarded the selected consultant;
- Conducted a best practices review;
- Assessed existing Safety and Security Certification Policy;
- Updated the Safety and Security Certification Program to an agency-wide policy;
- Incorporated the updated policy into the Workforce Assessment;
- Developed training materials;
- Incorporated the updated policy into the Recruitment and Hiring Plan; and
- Trained affected personnel.

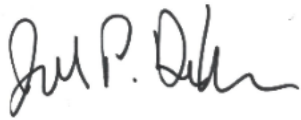
FTA carefully evaluated the submitted documentation and reviewed submissions with MBTA during biweekly meetings on SD 22-9 between October 2022 and October 2024. FTA verified incorporation of the Safety and Security Certification Program into the final Workforce Assessment in June 2024. In September 2024, MBTA delivered the final Recruitment and Hiring Plan to FTA, and FTA was able to verify that the Safety and Security Certification Program was also appropriately incorporated into the Recruitment and Hiring Plan.

Based on review of these submissions and the results of verification activities, FTA finds that these completed action items satisfy the requirements of CAP FTA-22-MBTA-CAT1-3 and this CAP may now be closed.

Conclusion

This CAP closure represents a tremendous amount of work, and FTA greatly appreciates your efforts. Please contact our SMI Coordinator, Christian Hernandez, by phone at (213) 552-3494 or by email at Christian.Hernandez@dot.gov with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe P. DeLorenzo".

Joe DeLorenzo
Associate Administrator and
Chief Safety Officer
Office of Transit Safety and Oversight

cc: Peter Butler, Regional Administrator, FTA Region 1
Ryan Coholan, Chief Operating Officer, MBTA
Tim Lesniak, Chief Safety Officer, MBTA
Meredith Sandberg, Chief of Quality, Compliance, and Oversight, MBTA
Pat Lavin, Chief Safety Officer, Massachusetts Department of Transportation
Jamie Van Nostrand, Chair, Massachusetts Department of Public Utilities (DPU)
Robert Hanson, Rail Safety Director, DPU