

**FTA-23-12-MBTA-CAT4-3**  
**Corrective Action Plan (CAP) Rewrite Evaluation Matrix**

In addition to the comments below, FTA requests that the next version of proposed CAP rewrite include the following:

- Line item continuing the monthly briefing to the General Manager currently executed under FTA-22-12-MBTA-CAT4-3 Action Item 2.
- Line item including the Project Management Plan, previously tracked under FTA-22-12-MBTA-CAT4-1.

Proposed CAP Items	Proposed Start Dates	Proposed End Dates	FTA Comments	MBTA Response (if needed)
Quality Management Program				
1. Assess Organizational Structure: Determine the appropriate governance structure for Quality Management to ensure QM is independent.	11/27/23	12/8/23	<b>Conditionally Approved.</b> As a condition of approval, MBTA must provide evidence of execution of the independent governance structure.	
2. Procure QM consulting services: Identify consulting resources to assist in program development including quality processes and documentation, long-term planning, and creation of promotional and training materials.	11/27/23	2/16/24	<b>Conditionally Approved.</b> As a condition of approval, MBTA must provide documentation of procurement and the start of work by no later than (NLT) 2/16/24.	
3. Quality Management System Manual (QMSM) – Update #1: Update the QMSM to: Incorporate FTA feedback on original submission under SD22-12 CAP#3 AI 5. Update organization details to reflect new independent structure. Include QM vision.	2/16/24	3/22/24	<b>Action Item Approved.</b>	
4. Create Promotional Materials: Develop promotional materials to familiarize MBTA employees with	2/16/24	4/5/24	<b>Action Item Approved.</b>	

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the Quality Management initiative and new QMSM.				
5. Create QM Training Materials: Create a brief training on basic Quality Management principles.	2/16/24	4/5/24	<b>Action Item Approved.</b>	
6. Message the QMSM: Distribute the promotional materials and QMSM to employees.	4/8/24	4/19/24	<b>Action Item Approved.</b>	
7. Train MBTA staff: Train impacted personnel on basic Quality Management principles.	4/8/24	4/1/25	<b>Not approved.</b> MBTA's submission does not support the timeline, which requires just short of one year to complete training.	
8. QMSM – Update #2: Update the QMSM with a focus on the audit process, including NCRs, corrective actions, and pre- and post-audit activities	4/22/24	11/1/24	<b>Action Item Approved.</b>	
9. Auditing program: Formalize and execute auditing program for Vehicle Engineering and Vehicle Maintenance of heavy and light rail cars.	4/22/24	1/10/25	<b>Action Item Approved.</b>	
10. Staffing plan: Develop a plan to hire or engage auditors, SMEs, and other necessary personnel to support program growth and develop staffing and hiring plan, align with Workforce Assessment (SD 22-9 Finding #1).	11/4/24	6/27/25	<b>Not approved.</b> Per FTA's response to MBTA's 9/29/23 relief request, the final activity for the Workforce Assessment (FTA-22-9-MBTA-CAT-1-1 Action Item 10) is due 5/10/24. The final five-year hiring plan is due 8/30/24 (FTA-22-9-MBTA-CAT1-2 Action Item 9).  Proposed Action Item 10, which proposes alignment with the Workforce Assessment,	

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			begins six months after the final Workforce Assessment is complete and two months after the hiring plan has been completed.	
11. Develop training on auditing process: Create a training demonstrating the audit process including the key players, steps, and required follow up.	10/7/24	12/13/24	<b>Action Item Approved.</b>	
12. Train MBTA employees on the auditing process: Train impacted personnel on auditing process.	12/16/24	12/9/25	<b>Not approved.</b> See Action Item 7.	
13. QMSM – Update #3 Capture final development updates in the QMSM.	11/4/24	2/28/25	<b>Action Item Approved.</b>	
14. Launch QM Oversight Committee: Launch annual oversight steering committee to review the health of Quality at the MBTA.	1/4/24	1/10/25	<b>Clarification required.</b> MBTA must explain the rationale for the timeline (just over one year).	
15. CAP verification: MBTA departments will 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.	Ongoing		<b>Action Item Approved.</b>	

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QA/QC Procedures for Vehicle Engineering				
16. Inventory and identify critical VE processes: Inventory existing quality framework including critical processes and procedures and identify critical processes requiring formal documentation.	12/4/23	3/1/24	<b>Action Item Approved.</b>	
17. Develop and update VE processes and SOPs: Document critical processes identified as requiring formal documentation and review existing policies and procedures for accuracy.	3/1/24	8/30/24	<b>Clarification required.</b> Is the anticipated output of this Action Item (output by 8/30/24) fully updated existing policies and procedures identified in the second part of the Action Item description?	
18. Create Vehicle Engineering QMP: Using the SOPs and processes, develop a Quality Management Plan for Vehicle Engineering detailing MBTA's oversight of railcar manufacturers and their suppliers.	6/21/24	9/20/24	<b>Action Item Approved.</b>	
19. Develop VE QMP training: Develop a training designed to familiarize VE staff with the new QMP.	8/19/24	12/20/24	<b>Clarification required.</b> MBTA must explain the rationale for the length of time required to develop familiarization training (four months).	
20. Train VE staff: Train impacted Vehicle Engineering staff on the new QMP.	1/6/25	12/19/25	<b>Not approved.</b> See Action Item 7.	

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21. Distribute VE QMP: Provide VE employees with the new VE QMP.	12/23/24	1/24/25	<b>Clarification required.</b> MBTA must explain the rationale for the length of time required to distribute the QMP.	
22. Review existing VE contracts and 3rd party QMPs: Review quality plans of railcar manufacturers and/or MBTA consultants related to quality control of railcars or subcomponents against new QMP. As applicable, mitigate discrepancies through engineering review and the waiver process, contract changes to incorporate MBTA quality requirements, or other approved methods.	1/6/25	6/27/25	<b>Not approved.</b> MBTA must explain the proposed output of this activity.  MBTA must also propose a new timeline for this activity. Based on the performance to date on VE procurement activities and based on the delivery timeline for major vehicle procurements, it is unacceptable to delay actions to mitigate quality control concerns nineteen months into the future.	
<b>QA/QC Procedures for Vehicle Maintenance</b>				
23. Inventory and identify VM critical processes: Inventory existing quality framework including critical processes and procedures and identify critical processes requiring formal documentation.	12/4/23	3/1/24	<b>Action Item Approved.</b>	
24. Develop and update VM processes and SOPs: Document critical processes identified as requiring formal documentation and review existing policies and procedures for accuracy.	3/1/24	8/30/24	<b>Clarification required.</b> See Action Item 17.	
25. Create Vehicle Maintenance QMP:	6/21/24	9/20/24	<b>Action Item Approved.</b>	

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Using the SOPs and processes, develop a Quality Management Plan for Vehicle Maintenance detailing MBTA's oversight of railcar manufacturers and their suppliers.				
26. Develop VM QMP training: Develop a training designed to familiarize VM staff with the new QMP.	8/19/24	12/20/24	<b>Clarification required.</b> See Action Item 19.	
27. Train VM staff: Train impacted Vehicle Maintenance staff on the new QMP.	1/6/25	12/19/25	<b>Not approved.</b> See Action Item 7.	
28. Distribute VM QMP: Provide VM employees with the new VM QMP.	12/23/24	1/24/25	<b>Clarification required.</b> See Action Item 21.	
29. Review existing VM contracts and 3 <sup>rd</sup> party QMPs: Review quality plans of railcar manufacturers and/or MBTA consultants related to quality control of railcars or subcomponents against new QMP. As applicable, mitigate discrepancies through engineering review and the waiver process, contract changes to incorporate MBTA quality requirements, or other approved methods.	1/6/25	6/27/25	<b>Not approved.</b> See Action Item 22.	

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Document Management to Support QM				
30. Inventory and identify Quality Records and Workflows: Identify Quality Records within the MBTA, and document “Current State” for existing processes and workflows.	12/4/23	8/16/24	<b>Clarification required.</b> MBTA must explain the rationale for the length of time for this Action Item.	
31. Develop QM DM Processes and SOPs: Develop plan for QM “Future-State” document control, processes, and workflows including SOPs, workflows, and document control plans.	8/16/24	12/16/24	<b>Clarification required.</b> MBTA must clarify whether the output of this activity is a plan, including plans to create SOPs, etc., or whether the output is a documented plan, documented SOPs, etc.  MBTA must also specify when the plan will be executed (i.e., when MBTA will execute its “Future State” plan).	
32. Select Document Management System (DMS): Identify and select DMS to address QM by supporting document control, records management, regulatory compliance, and QM audit requirements.	2/1/24	8/30/24	<b>Clarification required.</b> MBTA must explain the rationale for the length of time for this Action Item.  MBTA must also specify when the DMS will be in use.	
33. Develop QM DM Training Plan: Develop comprehensive plans for DMS differentiated instruction and training (synchronous and asynchronous) for MBTA QM staff using /working with the DMS.	3/35	9/26/25	<b>Clarification required.</b> MBTA must explain the rationale for the length of time for this Action Item.  MBTA must also explain why this Action Item begins three months after the end of Action Item 31.  Finally, MBTA must provide a completion date for the provision of training to existing personnel.	