

C. W. Moorman
Co-Chief Executive Officer



November 9, 2017

The Honorable Robert L. Sumwalt
Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

RE: DCA-16-FR-007

Dear Chairman Sumwalt:

In light of the upcoming meeting on November 14, 2017, of the National Transportation Safety Board to review the report of findings and recommendations pertaining to the investigation into the Chester, Pennsylvania, collision and derailment of Amtrak Train 89, I'd like to provide additional information supplementing our June 7, 2017, update relative to actions Amtrak has undertaken since the incident. We respectfully request that the NTSB consider this submission prior to issuing its final report and that this submission become part of the official public record. We invite any questions following your review of this submission.

As previously reported in February 2017, Amtrak created the Safety, Compliance and Training organization. This organization unifies the staff supporting the vital functions of System Safety, Operational Rules Compliance, Certification, and Technical Training Development and Delivery into a single department reporting to the Vice President of Safety, Compliance and Training. Since its creation, this organization has undertaken a number of efforts to improve our safety programs, organizational culture and training.

The Safety, Compliance and Training organization significantly increases the available number of subject matter experts and supports the corporation in order to improve its safety culture by providing a uniform and comprehensive framework of safety policies, safety assurance and risk management methods. With regard to safety promotion, Amtrak has established consistency in its safety messaging and has completed a series of three-day workshops with management employees to clarify expectations regarding safety. The workshops, entitled "Safety Starts With Me" articulate a consistent vision for safety throughout all levels of management. Qualitative and quantitative safety goals and objectives are defined in the sessions and managers are trained about foundational safety concepts such as risk identification and mitigation. Emphasis is placed on proactive risk management practices and effective communications concerning safety. Through this training, Amtrak reinforces that safety is not simply a priority, but is a core value shared among **all** employees. For example, managers are instructed to promote a safety culture; to commit to a continuous improvement of that safety culture including promoting safe behaviors and removing hazards and barriers to safety; to promptly and accurately report employee injuries and illnesses, and to report unsafe conditions or on duty injuries and illnesses without the fear of retaliation.



A complementary course for all agreement employees is currently under development with an anticipated delivery date in the first quarter of 2018. Amtrak is also developing additional modules to build on the initial series of workshops, each focusing on core safety principles.

Amtrak has reorganized its Safety group in recognition that strong leadership and a systems approach to the management of safety is required to address organizational and cultural factors which may have been involved in recent incidents. The new Amtrak Safety organization forms a triad of standard-bearing functions within Amtrak. The three departments work seamlessly to address safety concerns from multiple angles in an integrated manner. In building this organization, Amtrak recruited top talent in the respective areas of system safety, instructional system design and adult education. To date, the department has led a number of improvement initiatives as discussed below.

The System Safety Department, led by a Senior Director of System Safety, conducted a gap assessment focused on the safety organization which was in place at the time of the incident and the needs of the corporation regarding subject matter expertise in system safety management principles. This assessment resulted in a realignment of the department including the acquisition of credentialed safety professionals with experience and competency in the design, development and implementation of Safety Management Systems (SMS) in High Performance Organizations (HPO). Supported by Amtrak's executive leadership team, System Safety has been tasked with drafting an SMS. In pursuit of this effort, the System Safety organization has developed and issued a new safety policy which embraces safety as a core value of the company. The policy clarifies expectations regarding safety of operations and underpins the safety programs that Amtrak is building to support the SMS. Working in collaboration with all levels of the organization, Amtrak has realigned our safety programs in accordance with our safety policy. Safety programs which were once considered "optional" dependent on union participation, have been replaced by mandatory safety programs with an emphasis on foundational safety concepts including employee engagement and structured risk management methods. With the support of executive leadership, the System Safety Department has initiated a number of data collection and analysis efforts. These efforts are aided by the Compliance and Certification Department within the Safety Compliance and Training organization.

The Compliance and Certification Department, led by a Senior Director of Compliance and Certification, is comprised of the operating practices and rules department as well as an independent compliance assessment group tasked with providing oversight of the efficiency testing program. This department provides centralized resources regarding operating practices and rules interpretations. Since the creation of the department, the compliance and certification organization has performed an evaluation of the Amtrak efficiency testing program (TESTS) and made substantive modifications to the program which focus on safety critical rules and procedures. The Compliance and Certification group performs quality assurance activities to supplement existing field oversight of the program within operations. Amtrak has begun a structured program of Operational Testing Validation (OTV) audits to independently validate the observations of front-line supervision. The Compliance and Certification Department frequently partners with System Safety and the Technical Training Departments to conduct and analyze the OTV audit program. As a result of the OTV audits, Amtrak has identified necessary improvements to numerous operating practices as well as to training programs to increase comprehension and employee competency.



This group provides field validation metrics regarding the efficacy of training programs and the application of safety critical operating practices.

The Technical Training and Development Department, led by a Senior Director of Training, has built an instructional system design team tasked with review and redesign of all safety critical technical training. Amtrak has transitioned technical training development and delivery out of the human resources department into the newly aligned technical training group within the Safety Compliance and Training organization. This allows for increased synergy between the team developing the training programs and the groups tasked with evaluating the programs. The instructional system design team partners closely with subject matter experts within the Safety, Compliance and Training organization as well as front line management to design and develop training programs which meet the needs of both employees and Amtrak's learning objectives. The delivery of the training is conducted by subject matter experts with significant experience in the topical area, as well as instructional methods. This revised organizational structure removes barriers to collaboration between departments and offers increased resources to target the design and delivery to the needs of the operation.

Lastly, Amtrak recognizes that a cornerstone of an effective safety program is an environment in which employees are encouraged to report any unsafe condition uninhibited by fear of retaliation. There are mature C3RS programs in place at Amtrak with seven (7) mechanical labor organizations and five (5) transportation organizations. Amtrak is currently evaluating the Confidential Close Call Reporting (C3RS) programs in place to identify opportunities for expansion throughout the corporation.

As we move forward, we continue to assess and reassess our safety initiatives in an ongoing effort to continuously improve our safety culture and the effectiveness of our safety programs. We hope that this information is helpful to you as you prepare your report and look forward to attending the meeting on November 14, 2017.

We thank the NTSB for its assistance, cooperation and guidance during the investigative process.

Sincerely,

A large black rectangular redaction box covering the signature of Charles W. Moorman.

Charles W. Moorman
Co-Chief Executive Officer