

UNITED STATES DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

[Special Directive No. 26-1, Notice No. 1]

Special Directive Under 49 U.S.C. § 5329 and 49 CFR Part 670 to the Illinois Department of Transportation Regarding Required Actions to Strengthen State Safety Oversight of the Chicago Transit Authority Rail Transit System

AGENCY: Federal Transit Administration (FTA), U.S. Department of Transportation (DOT).

SUMMARY: FTA issues Special Directive (SD) 26-1 to require the Illinois Department of Transportation (IDOT) to take immediate action to address critical, persistent, and systemic deficiencies in its State Safety Oversight (SSO) program for the Chicago Transit Authority (CTA) rail transit system. FTA has determined that IDOT's SSO program does not provide effective, independent oversight of CTA's rail transit system as required under 49 CFR Part 674.

Based on FTA's recent audit of IDOT's SSO program, together with evidence uncovered through ongoing oversight activities under SD 23-1 and SD 25-3, FTA finds that IDOT has not exercised its authority, resources, or responsibilities at a level commensurate with CTA's size, complexity, or safety risk profile. Additionally—and as described below—IDOT has neither made adequate progress on the required actions in existing SDs nor appropriately addressed the recent audit findings and required actions. These deficiencies have allowed critical safety concerns to persist without effective mitigation. FTA has determined that the issuance of this SD is necessary because the public interest requires the mitigation of safety risk through immediate compliance. This SD applies solely to IDOT's SSO responsibilities for CTA and does not apply to IDOT's joint oversight activities with the Missouri Department of Transportation (MoDOT) for the Bi-State Development Agency (MetroLink) rail system.

In order to accelerate reforms of IDOT's oversight of CTA, this SD:

- Incorporates the eight findings from FTA's October 2025 SSO audit of IDOT as immediately enforceable findings under this directive;
- Establishes specific required actions and expedited completion timeframes for IDOT to correct these deficiencies; and
- Issues three additional findings and corresponding required actions where FTA has determined that further direction and enforcement are necessary to address ongoing safety risk at CTA.

In total¹, FTA directs IDOT to complete 11 required actions under this SD. The required actions in this SD are designed to quickly address longstanding deficiencies with IDOT's oversight of CTA that have not been sufficiently rectified. FTA is also initiating a Safety Management Inspection (SMI) to determine the root causes of IDOT's oversight deficiencies and the best way to address them.

FOR FURTHER INFORMATION, CONTACT: For program matters, Mr. Joseph

¹ FTA has the authority to enforce required actions in audit reports and need not issue Special Directives in all instances to take enforcement actions.

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SUPPLEMENTARY INFORMATION:

Background

FTA administers a national public transportation safety program to advance safe and reliable transit service throughout the United States. Among other things, FTA conducts safety investigations, assesses transit agency safety management practices, monitors SSO programs, conducts oversight of roadway worker protection programs, and issues Special Directives when, among other things, it identifies unsafe conditions or practices that present a substantial risk of death or personal injury.

IDOT is the State Safety Oversight Agency (SSOA) designated by the State of Illinois as responsible for overseeing rail transit safety in Illinois. IDOT's SSOA was certified in August 2018 in accordance with 49 U.S.C. § 5329 and 49 CFR Part 674. IDOT receives FTA grant funds to carry out its SSO program in accordance with Federal regulations. IDOT's SSO program oversees CTA's rail transit system and, through a separate joint arrangement with MoDOT, participates in oversight of the Illinois operations of the MetroLink rail system.

CTA operates one of the largest combined heavy rail and bus transit systems in the United States, providing more than a million passenger trips each weekday across the City of Chicago and 35 surrounding suburbs, supported by a workforce of more than 11,000 employees. CTA is governed by the Chicago Transit Board with four members appointed by the Chicago Mayor and three by the Illinois Governor.

CTA's rail transit system is the third-busiest rapid transit system in the country, with over 135 million total rides in calendar year (CY) 2025 and an average weekday ridership of approximately 450,000 passenger trips. The system consists of eight rail lines operating through 146 stations across 224.1 miles of track, with a fleet of approximately 1,500 railcars. CTA operates around-the-clock service on major lines.

IDOT SSO Program Deficiencies

FTA conducted a routine triennial SSO audit of IDOT from April 22–30, 2025, evaluating IDOT's SSO program for CYs 2022–2024. After significant engagement with IDOT, FTA issued its final report on October 7, 2025. The audit identified eight findings of noncompliance. These findings reflected systemic weaknesses in IDOT's use of investigative authority, field oversight, safety event investigation oversight, corrective action plan (CAP) management, and oversight of CTA's Agency Safety Plan (ASP), including Safety Risk Management and Safety Assurance processes.

FTA determined that IDOT has not consistently exercised its investigative authority to conduct the on-site safety reviews, inspections, or field verification necessary to independently assess CTA's compliance with its ASP or validate the effectiveness of CAPs and safety mitigations in practice, instead relying primarily on document reviews and meetings. FTA also found that IDOT has not effectively overseen CTA's safety event notification, investigation, and corrective

action processes, including failure to ensure timely notification of reportable events, to independently evaluate the quality and sufficiency of investigations, or to rigorously verify corrective action implementation and effectiveness, resulting in repeated extensions of CAPs without adequate justification. Finally, FTA found that IDOT did not consistently ensure that CTA fully implemented the requirements of 49 CFR part 673 or effectively oversee the use of safety data, hazard logs, and performance information to drive risk-based decision-making, undermining the Federally required safety programs intended to promote safety across the rail transit system.

FTA's subsequent review of IDOT's proposed corrective actions in response to the SSO audit found that IDOT's response was insufficient to address FTA's concerns. Across multiple findings, IDOT's proposed actions focused largely on future planning documents, schedules, and administrative tracking activities, without establishing enforceable inspection programs, timely verification mechanisms, or independent validation of corrective action effectiveness. For example, IDOT deferred resolution of ASP and Safety Risk Management deficiencies into late 2026 and did not establish processes to independently challenge repeated CAP extensions. These proposed actions failed to address the root causes identified in the audit and did not provide reasonable assurance of timely or effective oversight implementation.

Through ongoing monitoring conducted under SD 23-1, issued in 2023 to direct improvements in IDOT's staffing and technical capacity, FTA further confirmed that SSO program deficiencies have continued beyond the audit period and 45-day adjudication period. IDOT has not consistently reported to the scene of safety events, including a recent event involving a CTA worker, and continues to submit CAP logs, safety event investigation logs, and hazard logs that reflect the same weaknesses identified in the SSO audit—namely, delayed investigations, extended CAP due dates without demonstrated effectiveness, and limited independent verification.

Based on these deficiencies and commensurate with the safety risk inherent in the findings and required actions of the SSO audit, FTA is issuing this SD to adopt the eight SSO audit findings as enforceable requirements and to impose three additional required actions necessary to address ongoing safety risk at CTA and ensure effective implementation of IDOT's SSO responsibilities.

Findings Adopted from FTA's 2025 SSO Audit Report

This directive adopts and enforces eight findings from FTA's SSO audit.

Finding 1: IDOT did not use their investigative authority to conduct on-site safety reviews, inspections, and field activities to ensure SSO program implementation

FTA's SSO audit found that IDOT has not exercised its investigative authority to conduct the regular, independent on-site safety reviews, inspections, or field verification activities necessary to ensure effective implementation of its SSO program for CTA.

FTA's SSO audit determined that IDOT relies predominantly on document reviews, meetings, and adoption of CTA-generated materials to carry out its oversight responsibilities, rather than conducting independent, on-site inspections of CTA infrastructure, operations, maintenance

activities, or safety-critical work practices. Although IDOT's Program Standard maintains it has authority to enter and inspect CTA property, the audit found no evidence that IDOT used this authority to conduct field inspections tied to safety event causation, hazard verification, or systemic safety risk evaluation. IDOT could not provide any evidence supporting their use of investigative and enforcement authority to conduct inspections of track, vehicles, or infrastructure.

During interviews, IDOT acknowledged that it did not conduct on-site inspection activities during CY 2025 and delayed inspections for extended periods due to seasonal conditions. Additionally, in subsequent interviews since the audit, IDOT has indicated that it only conducted two inspections. The absence of routine, structured field inspections prevents IDOT from independently validating CTA's compliance with its ASP, identifying unsafe conditions before safety events occur, or assessing whether corrective actions are implemented or effective.

IDOT's December 12, 2025 proposal to address this finding in the SSO audit included producing a master inspection schedule by April 2026 and providing three example inspection reports by July 2026. This proposed action fails to demonstrate how IDOT will institutionalize field inspections as part of its SSO program, and the timeline and limited example reports delay evidence of actual oversight activity until well over a year after the audit.

Critically, the proposal does not include or reference a documented inspection program that defines how inspections are initiated, prioritized, executed, documented, and followed through to corrective action. The absence of such a program leaves unresolved the core deficiency identified in the audit – namely, that IDOT has not institutionalized inspection activities as a routine, independent oversight function, but instead relies on ad hoc participation, document receipt, or CTA-led processes.

This SD expedites the timeline for IDOT's master inspection schedule, independent of Risk Based Inspections required by SD 22-31, and expedites the timeline for minimum expectations of inspection activity; requires the development of a documented inspection program to ensure institutionalization of inspection activities as a routine, independent oversight function; and requires IDOT to provide ongoing reporting demonstrating execution its inspection program.

Finding 2: IDOT did not disburse obligated Federal grants in accordance with FTA rules, guidance, and grant agreements

FTA's SSO audit found that IDOT did not disburse obligated Federal SSO grant funds, resulting in underutilization of available resources necessary to conduct effective safety oversight.

Between fiscal years 2017 and 2025, FTA apportioned approximately \$28.4 million to IDOT for SSO activities; however, IDOT had disbursed only about 28 percent of these funds at the time of the audit, leaving more than \$21 million unobligated and unused. This prolonged under-expenditure occurred while IDOT simultaneously cited staffing and resource constraints as limiting its ability to perform substantive oversight activities.

The audit found that IDOT did not apply fringe rates consistently, resulting in inaccurate representations of grant drawdown and masking the true extent of unused Federal assistance. Although IDOT later provided a plan to improve spend-down rates, the audit concluded that insufficient grant execution directly contributed to limited field activity, reduced technical engagement, and over-reliance on CTA-produced materials.

IDOT's December 12, 2025 proposal to address this finding from FTA's SSO audit included updating its baseline spend down plan and two quarterly budget reports. While the proposed updated spend down plan addresses accounting mechanics, it does not explain how IDOT will ensure timely execution and oversight of expenditures going forward, and reliance on quarterly reports extending into late CY 2026 delays confirmation that grant management deficiencies have been meaningfully corrected. Further, the proposal does not address how IDOT will use the backlog of SSO funds available to the program.

This SD requires IDOT to submit a grant utilization plan that ensures timely execution and oversight of expenditures and addresses how IDOT will use the backlog of funds available to the program. Monthly budget execution reports will provide confirmation that grant management deficiencies are being meaningfully corrected.

Finding 3: IDOT did not annually review, revise, and distribute the Program Standard

FTA's SSO audit determined that IDOT did not annually review, revise, adopt, and distribute its SSO Program Standard as required by its own procedures and 49 CFR § 674.27

The audit established that the governing Program Standard in effect during the on-site review was dated October 2023, despite IDOT producing multiple draft revisions in 2024 and early 2025 that were never finalized or formally issued to CTA. This failure created uncertainty regarding applicable oversight requirements and weakened IDOT's ability to enforce compliance.

FTA determined that maintaining draft Program Standards for extended periods—without formal adoption—undermines regulatory clarity and allows critical oversight processes to remain incomplete or inconsistently applied. This deficiency is particularly concerning given ongoing concerns regarding CTA's Safety Management System implementation, safety event investigations, and CAP management.

IDOT's December 12, 2025 proposal to address this finding from the SSO audit included updating its process for ensuring the Program Standard is reviewed, revised, and distributed on an annual basis by August 2026, documentation of its coordination with CTA by October 2026, and providing an executed Program Standard update by January 2027. This proposal emphasizes document updates and transmittal milestones but fails to demonstrate how IDOT will revise the Program Standard. The extended timeline proposed by IDOT allows continued reliance on the outdated Program Standard for an extended length of time.

This SD requires IDOT to update its process for ensuring the Program Standard is reviewed, updated, and distributed within 60 days. It also requires IDOT to clarify that its periodic review

process does not replace its obligation to conduct an annual review process. The required action also requires IDOT to complete and distribute the finalized, current-year Program Standard, including updates to address all requirements within this Special Directive, within 90 days.

Finding 4: IDOT did not ensure CTA included and implemented all PTASP Part 673 requirements

FTA's SSO audit found that IDOT did not ensure that CTA's 2024 ASP (Revision 8) fully incorporated and implemented all applicable PTASP requirements of 49 CFR Part 673.

FTA's audit found that the 2024 ASP that IDOT approved did not clearly document required Safety Assurance processes, including monitoring of internal safety reporting programs. Additionally, CTA's ASP did not fully address statutory updates related to de-escalation training and risk reduction programs required under 49 U.S.C. § 5329(d) and Part 673. FTA's audit observed that CTA's Safety Department was not informed of all hazards and risks due to gaps in information sharing within the organization. FTA's audit also found issues regarding CTA's implementation of its Safety Risk Management process.

In response to FTA's audit, IDOT identified several proposed corrective actions to remedy the PTASP-related deficiencies. FTA finds that the proposed corrective actions are insufficient. The proposed corrective actions address specific requirements in CTA's ASP that were missing, which IDOT was responsible for identifying and addressing as part of the annual ASP review and approval process (49 CFR § 673.13(a)). However, the proposed corrective actions fail to address the overarching procedural deficiencies that led IDOT to miss key PTASP requirements in its annual review of the ASP.

Among the proposed corrective actions, IDOT proposed developing a "Technical Report" to address the PTASP-related findings, in which IDOT would review CTA's existing Safety Risk Management and Safety Assurance processes. However, FTA has concerns that given IDOT's lack of a sufficient ASP review and approval process, conducting such a review would not adequately identify areas that are non-compliant with the PTASP regulation.

Further, FTA issued SD 25-3 to CTA on December 8, 2025, which in part noted FTA's concern that CTA would not complete the required annual review and update of the 2025 ASP. It is the responsibility of IDOT to ensure that CTA is making adequate progress toward completing the annual ASP review and update process, per 49 CFR Part 673 and IDOT's own program standard. CTA did not receive Board of Directors approval of the 2025 ASPs until January 2026. This demonstrates a lack of oversight on the part of IDOT, and deficiencies in IDOT's ASP review and approval process.

Given CTA's scale and safety risk profile, acceptance of an incomplete or weakly implemented ASP constitutes a significant oversight failure. Therefore, this SD requires IDOT to revise its ASP review and approval process so that it properly identifies deficiencies and areas of non-compliance, and to amend its procedures for escalating enforcement when ASP submissions or the implementation of ASP elements are incomplete or non-compliant. This SD also requires IDOT to participate in FTA's ongoing audit of CTA's ASP, which was initiated by FTA in SD

25-3. Once IDOT has a compliant and effective ASP review and approval process, FTA is directing IDOT to use that process to review CTA's most recent 2025 ASP update, and to complete other related tasks that IDOT identified in its proposed corrective actions (see "Directive and Required Actions" for Finding 4).

Finding 5: IDOT did not ensure CTA notified the SSOA and FTA of all reportable accidents within two hours

FTA's SSO audit determined that IDOT did not ensure that CTA consistently notified the SSOA and FTA of all reportable safety events within the required two-hour timeframe. The audit documented multiple instances of late notifications, demonstrating a pattern rather than isolated lapses. IDOT did not identify, trend, or enforce corrective action to address these deficiencies. FTA finds that timely notification is foundational to effective oversight, enabling rapid assessment, investigation, and risk mitigation. IDOT's failure to enforce notification requirements limited its situational awareness and delayed safety response.

IDOT's December 12, 2025 proposal to address this finding from FTA's SSO audit addresses CTA's notification procedures but relies primarily on plan revisions and post-hoc log reviews rather than real-time verification or enforcement mechanisms.

This SD requires IDOT to move beyond passive receipt of notifications and actively enforce compliance through monitoring, trending, and corrective action on an expedited timeframe

Finding 6: IDOT did not ensure CTA implemented their accident investigation program as required by the Program Standard

FTA's SSO audit confirmed that IDOT did not ensure that CTA implemented safety event investigation processes in accordance with the Program Standard and Part 674 requirements.

Although CTA conducted investigations that IDOT formally adopted, the audit found no evidence that IDOT independently assessed causal analysis, verified contributing factors, or conducted supplemental field investigation activities. IDOT also did not document inspections of infrastructure, equipment, or work practices related to safety event causes.

FTA determined that accepting investigations without independent verification reduces oversight to an administrative function and fails to provide assurance that systemic risks are identified and mitigated. This is incompatible with IDOT's role as the SSOA for one of the nation's largest rail transit systems.

IDOT's December 12, 2025 proposal to address this finding from FTA's SSO audit focuses on reconciling documentation rather than assessing the quality, independence, or timeliness of investigations, and the proposed timeline postpones evidence of effective implementation until September 2026.

This SD requires IDOT to strengthen its investigative oversight posture, including establishing standards for reviewing CTA safety event information and providing evidence of direct oversight

activity, on an expedited timeframe commensurate with the fundamental nature of this oversight responsibility.

Finding 7: IDOT did not ensure CTA designed and implemented a process to track and manage CAPs to closure

FTA's SSO audit determined that IDOT did not ensure that CTA designed and implemented an effective process to track, manage, and close CAPs. The audit found that CAP tracking focused on administrative status updates rather than verification of implementation or effectiveness. IDOT did not consistently conduct field verification or require objective evidence demonstrating that corrective actions mitigated identified risks. FTA finds that weak CAP management allows safety deficiencies to persist unresolved and undermines accountability.

IDOT's December 12, 2025 proposal to address this finding from FTA's SSO audit includes revised procedures and documentation, culminating in the release of an updated Program Standard by January 2027. However, the proposal does not sufficiently address IDOT's role in independently challenging repeated CAP extensions.

This SD requires IDOT to implement a structured, verification-based CAP oversight process with defined milestones and enforcement consequences on an expedited timeline.

Finding 8: IDOT's electronically submitted annual report to FTA did not include all requirements

FTA's SSO audit found that IDOT's annual SSO reports submitted to FTA did not include all required elements.

The audit identified omissions and inconsistencies in annual reports, limiting FTA's ability to assess oversight effectiveness and emerging safety risks. Incomplete reporting further reflects broader deficiencies in data integration, oversight transparency, and performance monitoring.

IDOT's December 12, 2025 proposal to address this finding from FTA's SSO audit states that IDOT will provide a revised Program Standard to FTA as part of the 2025 annual report due in March 2026. This proposal does not address the overall accuracy and completeness of IDOT's annual reports.

This SD requires IDOT to establish documented procedures and to submit a crosswalk matrix with its upcoming 2025 annual report that demonstrates how IDOT met applicable Federal requirements.

Additional Findings Issued Under SD 26-1

In addition to issuing the eight SSO audit findings, this SD also issues the following additional three findings to ensure resolution of persistent issues with IDOT's SSO program that limit its effectiveness in overseeing CTA's safety performance.

Finding 9: IDOT does not independently verify the sufficiency of CTA safety event investigations to identify repeat events or ensure integration of investigation findings into CTA's Safety Risk Management process

In addition to Finding 6, which is focused on IDOT's failure to ensure process compliance, field verification, factual accuracy, and safety event-specific corrective actions, FTA also finds that IDOT has not established or implemented a sufficiently rigorous, independent process to oversee the quality, analytical sufficiency, and outcomes of CTA safety event investigations, limiting IDOT's ability to ensure that investigations identify systemic safety risks and result in effective corrective action to prevent recurrence and address repeat findings.

Although the SSO audit identified deficiencies related to IDOT's oversight of CTA safety event investigations, FTA's broader review of IDOT's oversight activities—including materials reviewed under Special Directive 23-1 and information developed through ongoing Federal oversight—identifies pervasive weaknesses in IDOT's approach to safety event investigation oversight.

IDOT's involvement in CTA safety event investigations has focused primarily on confirming that investigations were completed and submitted, rather than evaluating whether investigations were technically sound, complete, and analytically sufficient. IDOT documentation generally reflects acceptance of CTA's conclusions without evidence of independent assessment of causal analysis, contributing factors, or the adequacy of proposed corrective actions.

In addition, IDOT has not demonstrated a consistent process for identifying when additional investigative steps—such as field inspections, supplemental analysis, or expanded causal review—are warranted based on the severity or recurrence of safety events. This limits IDOT's ability to identify systemic issues that may not be evident from CTA's internal investigations alone.

FTA finds that this approach reduces IDOT's oversight role to an administrative function and does not provide reasonable assurance that safety event investigations are being used as an effective tool for hazard identification and risk reduction. Given CTA's size, operational complexity, and history of serious safety events, FTA determines that enhanced, directive oversight of safety event investigations is necessary and cannot be deferred to future programmatic improvements.

Finding 10: IDOT does not ensure CAPs are closed by approved due dates, allowing safety risk to remain unmitigated

In addition to Finding 7, which focuses on IDOT's oversight of CTA's CAP management process, FTA also finds that IDOT's CAP management practices do not provide adequate controls to ensure timely mitigation of known safety risks, resulting in corrective actions remaining open for extended periods without effective escalation, verification, or enforcement. While the SSO audit identified deficiencies in IDOT's CAP tracking and closure processes, FTA's review of IDOT's broader CAP management practices demonstrates that these weaknesses extend beyond the specific audit findings and represent a systemic oversight failure.

FTA observed that CAPs associated with CTA safety issues frequently remain open for prolonged periods, with due dates repeatedly extended without documented, risk-based justification. IDOT's CAP records emphasize status tracking and narrative updates but provide limited evidence that IDOT independently verifies whether corrective actions have been fully implemented or whether they have been effective in mitigating the underlying safety risk.

Further, IDOT has not demonstrated the use of escalation mechanisms when CAPs stall, remain overdue, or address high-risk conditions. FTA did not find evidence that IDOT has imposed consequences, required alternative corrective strategies, or otherwise exercised enforcement authority when CAP implementation did not progress as planned.

FTA finds that these CAP management practices undermine the purpose of corrective actions as tools for driving timely and sustained safety improvement. Instead, CAPs function largely as administrative records rather than enforcement instruments. Given the persistence of open CAPs and the continued presence of safety risk at CTA, FTA determines that additional, prescriptive requirements for CAP governance, prioritization, escalation, and effectiveness verification are necessary and must be imposed through this SD.

Finding 11: IDOT does not ensure that CTA's monthly hazard log reflects CTA's operating environment and experience

FTA finds that IDOT has not ensured that CTA's Safety Risk Management process and hazard log function as an effective, closed-loop system to identify, assess, prioritize, and mitigate safety risks, limiting assurance that CTA's Safety Risk Management process is fully implemented in practice.

FTA's review of CTA hazard logs, safety risk assessments, and related oversight materials identified long-standing hazards that remained open for extended periods, incomplete or missing safety risk assessments, and weak linkage between identified hazards, mitigations, and corrective action plans. These conditions were documented across multiple oversight activities and are not limited to a single audit cycle.

FTA further determined that IDOT's oversight of CTA's Safety Risk Management activities has not been sufficiently independent or probing to identify and correct these deficiencies. IDOT's reviews have focused primarily on confirming the existence of hazard logs rather than evaluating whether hazards are being actively managed, risk-ranked, and mitigated.

IDOT did not consistently document challenges to CTA where hazards remained unmitigated, risk assessments were incomplete, or mitigations were delayed. As a result, FTA lacks reasonable assurance that CTA's Safety Risk Management process is operating as a dynamic risk-management function rather than a static or compliance-driven recordkeeping exercise. Weaknesses in hazard identification and mitigation represent ongoing, unaddressed safety risk. FTA therefore issues this finding to require IDOT to take immediate, directive action to strengthen its oversight of CTA's hazard management and risk assessment processes.

DIRECTIVE AND REQUIRED ACTIONS:

In accordance with 49 U.S.C. § 5329 and 49 CFR part 670, FTA directs IDOT to take the following actions:

Findings		Tracking #	Required Actions
Finding 1	IDOT did not use their investigative authority to conduct on-site safety reviews, inspections, and field activities to ensure SSO program implementation	FTA-26-1-001	<p>IDOT must use their investigative authority, including conducting inspections, for SSO program implementation.</p> <p>April 17, 2026: IDOT must provide FTA with an annual Master Schedule of SSO inspections, independent of Risk Based Inspections required by SD 22-31. The Master Schedule will identify the positions responsible for inspections, frequency of inspections (e.g., weekly, monthly), and types of inspection activities (e.g., inspections of track, vehicles, facilities, and infrastructure; evaluations of personnel rules compliance; and on-site and virtual participation in CTA meetings, training sessions, and internal reviews). IDOT must notify FTA within 7 business days of any changes to this Master Schedule.</p> <p>May 1, 2026: IDOT must submit an outline of a documented inspection program that includes:</p> <ul style="list-style-type: none">● Criteria for conducting independent on-site inspections, safety event causation, and safety concern verification.● Minimum inspection frequencies.● Procedures for documenting inspection findings, deficiencies, and follow-up actions.● Process for tracking and verifying corrective action implementation through field verification. <p>May 19, 2026: IDOT must conduct and document at least eight (8) independent on-site inspections covering diverse operational areas (e.g., track infrastructure, vehicle maintenance, roadway worker protection, traction power, emergency preparedness,</p>

Findings		Tracking #	Required Actions
			<p>station facilities, control center operations, and safety-critical work practices).</p> <p>June 2, 2026: IDOT must begin submitting inspection summary reports demonstrating compliance with minimum inspection frequencies to FTA every month until notified by FTA that they are no longer required. These reports must include findings, corrective actions required, and follow-up verification activities.</p> <p>June 17, 2026: IDOT must submit a documented inspection program that includes:</p> <ul style="list-style-type: none"> ● Criteria for conducting independent on-site inspections, safety event causation, and safety concern verification. ● Minimum inspection frequencies by inspection activity. ● Procedures for documenting inspection findings, deficiencies, and follow-up actions. ● Process for tracking and verifying corrective action implementation through field verification.
Finding 2	IDOT did not disburse obligated Federal grants <u>in accordance with FTA rules, guidance, and grant agreements</u>	FTA-26-1-002	<p>IDOT must develop a spending plan for FTA review that includes a proposed schedule for current Federal funding. The plan must consider:</p> <ul style="list-style-type: none"> ● Hiring or contracting qualified oversight staff with rail transit safety expertise. ● Independent inspections, investigations, and field verification activities. ● Technical consulting support for specialized oversight (e.g., traction power, rolling stock, signal systems). ● Training and professional development for SSO staff. ● Safety data analytics and performance monitoring tools. <p>The plan must include:</p>

Findings		Tracking #	Required Actions
			<ul style="list-style-type: none"> ● Projected expenditures for the remainder of FY 2026 and FY 2027. ● Specific positions, contracts, or services to be funded. ● Timeline for expenditure execution. ● Demonstration that funds will support active oversight, not merely administrative functions. <p>July 17, 2026: IDOT must begin submitting monthly budget execution reports that document actual disbursements and the safety oversight activities funded. IDOT must continue submitting these monthly reports until notified by FTA that they are no longer required.</p>
Finding 3	IDOT did not annually review, revise, and distribute the Program Standard	FTA-26-1-003	<p>IDOT must implement the process outlined in their Program Standard for annual review, revision, and distribution of the Program Standard.</p> <p>May 19, 2026: IDOT must update its recurring annual process for Program Standard review, update, and distribution, including responsible parties, timeline, CTA consultation requirements, FTA notification protocols, and enforcement mechanisms. This update must clarify that IDOT’s periodic review process does not replace its obligation to perform an annual Program Standard review, update, and distribution process.</p> <p>June 17, 2026: IDOT must complete and distribute to CTA the finalized, current-year Program Standard (Revision 8 or higher) that incorporates:</p> <ul style="list-style-type: none"> ● Process for managing annual Program Standard updates. ● All inspection, investigation, and CAP oversight requirements established under this Special Directive. ● Enforcement authorities and escalation protocols established under this Special Directive.

Findings		Tracking #	Required Actions
			<p>July 17, 2026: IDOT must submit documentation of CTA's receipt and acknowledgment of the updated Program Standard.</p>
Finding 4	IDOT did not ensure CTA included and implemented all PTASP Part 673 requirements	FTA-26-1-004	<p>IDOT must submit and implement a process that ensures the CTA PTASP includes all Part 673 requirements, and hazards are identified, tracked, and assessed through the Safety Risk Management process.</p> <p>April 17, 2026:</p> <ul style="list-style-type: none"> • IDOT must submit to FTA a process for ASP reviews that ensures ASPs meet all applicable PTASP requirements in 49 CFR Part 673. • IDOT must submit procedures for escalating enforcement when ASP submissions or the implementation of ASP elements, including Safety Risk Management processes, are incomplete or non-compliant. • IDOT must participate in FTA's focused ASP audit of CTA. This may include participating in relevant meetings, identifying potential findings pertaining to CTA's Safety Risk Management and Safety Assurance processes, and supporting compliance monitoring, as directed by FTA. <p>August 18, 2026: IDOT must complete and document a substantive review and approval of CTA's 2025 ASP using the process developed above, as required by 49 CFR 673.13(a). IDOT must submit to FTA:</p> <ul style="list-style-type: none"> • Findings from its ASP review; • Any corrective actions required of CTA; • IDOT's plan to verify implementation and effectiveness of the ASP. <p>September 17, 2026: To ensure CTA is complying with requirements to carry out Safety Risk Management processes, IDOT must begin submitting to FTA monthly</p>

Findings		Tracking #	Required Actions
			<p>documentation demonstrating implementation of the enhanced oversight actions identified in IDOT's Notification of Enhanced Oversight letter to CTA dated February 14, 2025, including:</p> <ul style="list-style-type: none"> • Evidence of continued implementation of Triennial Audit CAP 202406-TA-05 addressing inconsistent application of Safety Risk Management and hazard tracking across CTA departments. • Monthly Performance Metrics reports submitted by CTA and reviewed by IDOT as part of the Risk-Based Inspection Program. Documentation demonstrating that IDOT has scheduled at least one engagement session with each of the following CTA user groups: Rail Operations, Rail Station Management, Rail Maintenance, and Infrastructure. <p>IDOT must continue submitting these monthly reports until notified by FTA that they are no longer required.</p>
Finding 5	IDOT did not ensure CTA notified the SSOA and FTA of all reportable accidents within two hours.	FTA-26-1-005	<p>IDOT must ensure CTA provides notification of all reportable accidents within two hours.</p> <p>April 17, 2026: IDOT must submit an outline for enforcement procedures for CTA's compliance with two-hour notification requirements.</p> <p>May 19, 2026: IDOT must implement enforcement procedures for CTA's compliance with two-hour notification requirements including:</p> <ul style="list-style-type: none"> • Real-time tracking and monitoring protocols for all reportable safety events. • Escalation criteria and enforcement actions for late notifications (including potential inspection triggers, increased oversight, or formal enforcement letters). • Documentation requirements for notification compliance.

Findings		Tracking #	Required Actions
			<ul style="list-style-type: none"> Process for trending and analyzing notification performance. <p>May 19, 2026: IDOT must begin providing monthly notification compliance reports to FTA. The reports must document all reportable accidents, notification times, any late notifications and enforcement actions taken, and trends and corrective measures implemented. IDOT must continue submitting these monthly reports until notified by FTA that they are no longer required.</p>
Finding 6	IDOT did not ensure CTA implemented their accident investigation program as required by the Program Standard.	FTA-26-1-006	<p>IDOT must ensure CTA maintains accurate investigation tracking logs in accordance with the Program Standard.</p> <p>April 17, 2026: IDOT must begin submitting all draft and adopted investigation reports to FTA, including documentation of the independent verification activities conducted by IDOT, evidence of enforcement actions taken where CTA's accident investigations were found to be factually incomplete, inaccurate, or lacking adequate corrective measures, documentation of any instances where IDOT challenged CTA's safety event investigation findings or required supplemental investigation work. These materials must be provided to FTA no later than 15 business days after receipt from CTA or from IDOT finalization.</p> <p>May 19, 2026: IDOT must submit a documented safety event investigation oversight process that establishes:</p> <ul style="list-style-type: none"> Criteria for determining when IDOT will conduct independent field inspections of CTA-led investigation activities. Standards for reviewing CTA's accident investigation reports, including evaluation of: <ul style="list-style-type: none"> Accuracy of factual findings. Completeness of timeline and event sequence documentation.

Findings	Tracking #	Required Actions
		<ul style="list-style-type: none"> ○ Identification of immediate causes and equipment/infrastructure failures. ○ Adequacy of proposed corrective actions to address accident-specific deficiencies. ○ Procedures for conducting independent field verification activities at accident sites, including: <ul style="list-style-type: none"> ▪ Physical inspection of damaged equipment, track, infrastructure, or facilities. ▪ Documentation of site conditions. ▪ Collection of independent measurements, photographs, or physical evidence. ▪ Interviews with involved personnel. ○ Requirements for challenging or rejecting accident investigation reports that lack sufficient documentation, omit critical factual information, or propose inadequate corrective actions. ○ Process for requiring CTA to conduct supplemental investigation activities when initial reports are insufficient. ○ Process for reviewing and reconciling event notification and investigation report dates, times, and descriptions with the IDOT event investigation report review checklist. <p>July 17, 2026: Separate and apart from the independent on-site inspections required under Finding 1, IDOT must conduct and document independent field-based oversight of five (5) recent CTA safety event investigations, demonstrating:</p> <ul style="list-style-type: none"> ● On-site inspection of safety event location, equipment, or infrastructure (for at least 3 of the 5 events). ● Independent verification of factual findings reported by CTA. ● Assessment of whether CTA's investigation accurately documented the event sequence and immediate causal factors.

Findings		Tracking #	Required Actions
			<ul style="list-style-type: none"> ● Evaluation of whether CTA's proposed corrective actions adequately address the specific equipment failure, infrastructure deficiency, or procedural gap that caused the accident. ● Documentation of any discrepancies between IDOT's independent findings and CTA's investigation report. ● Any additional requirements imposed on CTA to supplement or correct investigation findings. <p>July 17, 2026: IDOT must begin to provide monthly updated investigation tracking logs demonstrating implementation of event reconciliation process. IDOT must continue submitting these monthly logs until notified by FTA that they are no longer required.</p>
Finding 7	IDOT did not ensure CTA designed and implemented a process to track and manage CAPs to closure.	FTA-26-1-007	<p>IDOT must ensure CTA develops and implements a process to track and manage CAPs to closure in a timely manner including a formal means to revise CAP due dates.</p> <p>April 17, 2026: IDOT must begin providing a monthly CAPs matrix and report to FTA documenting its management and the status of all CTA CAPs until FTA notifies IDOT that these reports are no longer necessary.</p> <p>May 19, 2026: IDOT must establish and implement enhanced CAP management procedures including:</p> <ul style="list-style-type: none"> ● Formal extension approval requirements with written risk-based justification. ● Escalation protocols for CAPs open beyond original due dates or receiving multiple extensions. ● Field-based effectiveness verification before CAP closure (not reliance on CTA documentation alone). ● Enforcement actions for overdue high-risk CAPs (increased inspection frequency, on-site verification, formal enforcement letters, etc.).

Findings		Tracking #	Required Actions
			<ul style="list-style-type: none"> Periodic executive-level review of all open high-risk CAPs.
Finding 8	IDOT's electronically submitted annual report to FTA did not include all requirements.	FTA-26-1-008	<p>IDOT must ensure that the annual reports with all the of the required elements are electronically submitted to FTA by the March 16 deadline.</p> <p>April 17, 2026 (Within 30 days): IDOT must establish documented procedures to ensure complete and timely annual reporting, including data collection and compilation processes, quality review protocols, submission timeline and responsible parties, and FTA notification and coordination procedures.</p> <p>By March 16, 2026: IDOT must submit its calendar year 2025 annual report to FTA, including all required elements under 49 CFR § 674.39 with a crosswalk matrix documenting where each requirement is addressed in IDOT's submission.</p>
Finding 9	IDOT does not independently verify the sufficiency of CTA safety event investigations to identify repeat events or ensure integration of investigation findings into CTA's Safety Risk Management process.	FTA-26-1-009	<p>IDOT must establish a process to evaluate the quality, analytical sufficiency, and outcomes of CTA safety event investigations to identify repeat findings and ensure safety concerns are addressed through CTA's safety risk management process as appropriate.</p> <p>May 1, 2026: IDOT must submit an outline for a safety event investigation oversight process.</p> <p>May 19, 2026: IDOT must submit a documented safety event investigation oversight process that establishes:</p> <ul style="list-style-type: none"> Criteria for evaluating the analytical quality and depth of CTA safety event investigations, including: <ul style="list-style-type: none"> Root cause analysis methodology (e.g., use of systematic tools like 5-Whys, fault trees, fishbone diagrams).

Findings		Tracking #	Required Actions
			<ul style="list-style-type: none"> ○ Identification of contributing organizational factors (e.g., training, procedures, supervision, safety culture, resource allocation). ○ Assessment of whether investigations distinguish between isolated incidents and symptoms of systemic problems. ○ Evaluation of how investigations link to CTA's hazard log and Safety Risk Management process. ● Requirements for IDOT to identify patterns, trends, and recurring themes across multiple safety events, including: <ul style="list-style-type: none"> ○ Similar event types occurring in different locations or departments. ○ Common contributing factors across seemingly unrelated events. ○ Recurring equipment failures, procedural violations, or human factors issues. ● Standards for determining when individual investigations reveal systemic risks requiring programmatic corrective action beyond event-specific fixes. ● Procedures for challenging CTA investigations that: <ul style="list-style-type: none"> ○ Stop at immediate causes without identifying underlying organizational factors. ○ Propose corrective actions that address symptoms rather than root causes. ○ Fail to identify similar hazards or vulnerabilities elsewhere in the system. ○ Do not result in updates to CTA's hazard log or risk assessments. ● Process for requiring CTA to conduct supplemental systemic analysis when investigations identify recurring or widespread safety issues. ● Requirements for ensuring investigations function as organizational learning mechanisms that drive continuous safety improvement.

Findings		Tracking #	Required Actions
			<p>July 17, 2026: IDOT must begin submitting to FTA a quarterly analytical review of CTA safety event investigations for the previous three months, demonstrating:</p> <ul style="list-style-type: none"> • Independent evaluation of root cause analysis quality and depth. • Assessment of whether investigations identified systemic issues, organizational factors, or isolated incidents. • Analysis of whether corrective actions address underlying causes or merely treat symptoms. • Review of linkage between investigation findings and CTA's hazard identification, risk assessment, and mitigation processes. • Identification of patterns or common themes. • Documentation instances where IDOT identified systemic risks that CTA's individual investigations failed to recognize. • Evidence of how investigation findings informed IDOT's ongoing oversight priorities, inspection focus areas, or required programmatic changes at CTA. • Documentation of actions IDOT is requiring CTA to take. <p>IDOT must continue submitting these quarterly reports until notified by FTA that they are no longer required.</p>
Finding 10	IDOT does not ensure CAPs are closed by approved due dates, allowing safety risk to remain unmitigated.	FTA-26-1-010	<p>IDOT must establish and implement a process to monitor, prioritize, and bring CTA CAPs to closure by formally approved due dates.</p> <p>April 17, 2026: IDOT must submit a comprehensive risk-based CAP close-out plan that categorizes all open CAPs by risk level (high/medium/low), prioritizes high-risk CAPs for closure, establishes specific closure targets and timelines, identifies verification activities required for each high-risk CAP,</p>

Findings		Tracking #	Required Actions
			<p>and documents enforcement actions planned for long-overdue CAPs.</p> <p>August 18, 2026: IDOT must demonstrate verified closure of at least ten (10) high-risk or significantly overdue CAPs, with documentation showing field verification conducted, effectiveness validation performed, and risk mitigation achieved (not just scheduled completion). Implementation results from this process should be documented as part of the monthly report required in Finding 7.</p>
Finding 11	IDOT does not ensure that CTA's monthly hazard log reflects CTA's operating environment and experience.	FTA-26-1-011	<p>IDOT must develop a process to manage its review and monitoring of CTA's monthly hazard log, ensuring hazards are identified and assessed.</p> <p>April 17, 2026: IDOT must submit an outline of a hazard log oversight process.</p> <p>June 1, 2026: IDOT must submit a hazard log oversight process that:</p> <ul style="list-style-type: none"> ● Requires monthly IDOT review of CTA's complete hazard log; ● Establishes criteria for evaluating whether hazards are appropriately identified, categorized, and prioritized; ● Ensures safety risk assessments are performed for all identified hazards, including those from safety event investigation, inspections, employee reporting, and audits and reviews, within required timeframes; ● Verifies clear linkage between hazards, risk assessments, mitigations, and corrective action plans; ● Includes procedures for challenging incomplete, inadequate, or stalled hazard management; and ● Requires IDOT verification that CTA's SRM process functions as dynamic risk management, not static recordkeeping.

Findings	Tracking #	Required Actions
		<p>June 17, 2026: IDOT must conduct and document a comprehensive review of CTA's hazard log covering the trailing 12-month period, including assessment of all open hazards and their status, evaluation of risk assessment completeness and quality, review of mitigation effectiveness for closed hazards, identification of long-standing hazards without adequate mitigation, and analysis of hazard trends and systemic risk patterns.</p> <p>June 17, 2026: IDOT must begin submitting monthly reports documenting its findings from its ongoing hazard log review, corrective actions required of CTA to address hazard management deficiencies, IDOT's plan for ongoing monthly hazard log oversight, and evidence any formal challenges issued to CTA regarding incomplete risk assessments, inadequate mitigations, or stalled hazard resolution. IDOT must continue submitting these monthly reports until notified by FTA that they are no longer required.</p>

FTA will receive submissions for review and accept and monitor IDOT’s progress in resolving each finding and required action. FTA will conduct scheduled meetings with IDOT to review its progress until such time as FTA determines that these meetings are no longer needed or may be conducted with less frequency. FTA also may conduct onsite inspections and assessments to confirm implementation of required actions.

IDOT must submit biweekly (every two weeks) progress reports to FTA beginning 14 days after receipt of this Special Directive. Progress reports must document the status of all required actions, milestones achieved, challenges encountered and planned next steps.

FTA may verify compliance through document review, interviews with IDOT and CTA personnel, and onsite observation of oversight activities.

SUBMISSIONS: Upload submissions into the Special Directive Management Tool (SDMT): <https://ftawebprod.fta.dot.gov/SDMT/Directive/26-1>

PETITIONS FOR RECONSIDERATION:

As set forth in 49 CFR § 670.27(d), IDOT has 30 calendar days from the date of this Special Directive to petition for reconsideration with the FTA Administrator. The petition must be in writing, signed by IDOT's Accountable Executive, and must include a brief explanation of why IDOT believes the Special Directive should not apply or why compliance is not possible, not practicable, unreasonable, or not in the public interest. The petition may include relevant information regarding the factual basis upon which the Directive was issued; information in response to any alleged violation or in mitigation thereof; recommended alternative means of compliance for consideration; and any other information IDOT deems appropriate.

Unless explicitly stayed or modified by the Administrator, this Special Directive remains in effect pending review of any petition.

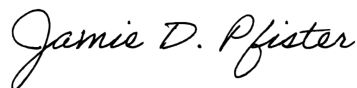
Within 90 days of receipt of a petition, the Administrator will provide a written response. Relief may be granted only where IDOT clearly articulates alternative actions that will provide, in the Administrator's judgment, a level of safety equivalent to compliance with this Special Directive, or where IDOT identifies legal or material facts not in evidence at the time the Special Directive was issued.

ENFORCEMENT:

FTA may take enforcement action for any violation of this Special Directive or of the terms of any written plan adopted pursuant to this Special Directive, in accordance with FTA's authorities under 49 U.S.C. § 5329. Enforcement actions include, but are not limited to, requiring IDOT to conduct more frequent oversight of CTA and requiring IDOT to use Federal financial assistance to correct safety deficiencies.

FTA reserves the right to take additional enforcement action as necessary to ensure the safety of CTA's rail transit system and the effectiveness of IDOT's SSO program.

Issued on: 3/17/2026



Jamie D. Pfister
Acting Executive Director
Federal Transit Administration
U.S. Department of Transportation