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Rule Compliance

Abstract: This *Standard* outlines the basic elements of a rule compliance program needed to verify adherence to operating rules.

Keywords: compliance checks, efficiency checks, rule audits, rules compliance

Summary: This *Recommended Practice* provides minimum rule compliance requirements for rail transit systems (RTSs) to ensure that their approved operating rules are implemented and followed according to the standard stated within the rule's guidelines.

Scope and purpose: This standard applies to rail transit systems that operate light and heavy rail systems. It does not apply to commuter railroads that operate on the general railroad system regulated by the Federal Railroad Administration (FRA). Operating rules are created to promote safe, efficient, timely and customer-oriented transit operations. Adherence to these operating rules is necessary to achieve these objectives.

This Recommended Practice represents a common viewpoint of those parties concerned with its provisions, namely, transit operating/planning agencies, manufacturers, consultants, engineers and general interest groups. The application of any standards, practices or guidelines contained herein is voluntary. In some cases, federal and/or state regulations govern portions of a transit system's operations. In those cases, the government regulations take precedence over this standard. APTA recognizes that for certain applications, the standards or practices, as implemented by individual transit agencies, may be either more or less restrictive than those given in this document.

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1. General requirements

All rail transit systems shall have a written expression of their policies and practices. These policies and practices are conveyed in various general and specialized rulebooks, operating bulletins, special orders, standard operating procedures and/or other similar documents. The benefit of rules comes from their implementation and use, which can only be ensured through periodic review and follow-up. Each RTS shall develop a formal process of observations to evaluate and verify that rules are followed.

Each RTS shall define the rule compliance requirements to verify and evaluate that its rules are followed. While each RTS shall develop its own auditing requirements, the following elements shall be included (location in this *Recommended Practice* is provided in parentheses):

- Evaluation process (2.1)
- Positions or functions to be evaluated (2.1)
- Organizational responsibility (2.2)
- Evaluation cycle/definition of the frequency of compliance checks (2.3)
- Method of verification (2.4)
- Record-keeping (2.5)
- Corrective action (2.6)
- Metrics (Annex A)
- Validation/analysis of program effectiveness (2.7)

2. Compliance program definition

2.1 Evaluation process

The RTS shall define which job classifications and job functions will be evaluated.

The RTS shall define a method to identify the rules and procedures evaluated as a part of its rule compliance program. Jobs and functions to be considered should include, but not be limited to, those engaged in railway work and those providing protection to railway workers. At a minimum, the program shall include rules the RTS has identified as being safety critical or associated with accidents and incidents on the property and in the industry.

The RTS shall establish a method to set goals for the number and type of compliance checks performed. The RTS shall establish a method to evaluate the conduct of compliance checks to determine if these goals are being accomplished.

The RTS shall establish a process to evaluate the effectiveness of RTS administration of rule compliance program requirements.

The RTS shall determine whether compliance check results will be included with any other employee performance evaluation documentation.

2.2 Organizational responsibility

The RTS shall define which part(s) of the organization shall administer the rule compliance process. This includes monitoring the compliance program to verify that it is being followed according to established policies and standards.

The RTS shall define the minimum level of qualification required to perform the function of an evaluator.

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2.3 Evaluation cycle

The RTS shall determine the evaluation frequency. The RTS shall consider the size and complexity of its operation in establishing the evaluation cycles.

2.4 Method of verification

In determining the method of rules compliance verification, the RTS shall consider characteristics such as various times of the day, days of the week, geographic locations, system features and/or other appropriate practices/conditions. Compliance checks shall be observations of operational personnel performing their jobs/duties. These observations may be performed announced or unannounced.

Compliance checks shall be performed in a methodical, objective manner. The means of collecting data (i.e., forms, electronic or other) shall be standardized, along with specific instructions for conducting the compliance checks. Observers shall be trained in the methods of collection and proper documentation of the observations.

The RTS shall establish a process for evaluating discrepancies between compliance check findings and operational and safety incident data, including both internal and external reviews and audits.

The RTS shall establish a procedure of periodic review of rules compliance check activities. The review should include, at a minimum:

- The number of checks performed;
- Type of checks conducted;
- Time of checks;
- Locations of checks;
- Employees checked;
- People conducting the checks; and
- Results of the checks.

The RTS shall have a methodology for analyzing the results of its periodic review.

In addition to verification noted above, the RTS shall establish and implement a process for an independent (other than the entity designated to conduct compliance checks) review of the compliance check program.

Informative Annex A gives examples that RTSs can use or adapt to help develop their rule compliance programs.

2.5 Record-keeping

The RTS shall maintain records of compliance observations, data analysis and corrective actions.

2.6 Corrective action

Corrective actions may be necessary to address problems identified with the compliance check program and/or the results of individual compliance checks. The RTS shall determine acceptable levels of compliance and have defined corrective actions or guidelines to address noncompliance. Corrective actions should be administered in a timely manner, commensurate with the severity of the noncompliance.

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2.7 Validation/analysis of program effectiveness

The RTS shall develop and administer a process for evaluating the implementation of corrective actions and their effectiveness.

3. Alternate practices

Individual rail transit systems may modify the practices in this standard to accommodate their specific equipment and mode of operation. APTA recognizes that some rail transit systems may have unique operating environments that make strict compliance with every provision of this standard impossible. As a result, certain rail transit systems may need to implement the standards and practices herein in ways that are more or less restrictive than this document prescribes. An RTS may develop alternate practices to the APTA standards so long as the alternates are based on a safe operating history and are described in the system's safety program plan (or another document that is referenced in the system safety program plan).

Documentation of alternate practices shall do the following:

- Identify the specific APTA rail transit safety standard requirements that cannot be met.
- State why each of these requirements cannot be met.
- Describe the alternate methods used.
- Describe and substantiate how the alternate methods do not compromise safety but provide a level of safety equivalent to the practices in the APTA safety standard (operating histories or hazard analysis findings may be used to substantiate this claim).

It must be noted that rail transit is not directly comparable to railroads. Rail transit systems differ greatly in the types of service, vehicles and technology employed, with some systems operating fully automated trains on exclusive rights-of-way and others operating on streets mixed with traffic. Rail transit demands a unique approach to solving its problems, and the APTA Rail Transit Standards Program was enacted to accomplish this complex task.

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Annex A: Examples of metrics to support the methods of verification

This annex contains informative examples of rule compliance checks. It includes information on when compliance checks should be performed and by whom, and the types of rule topics that are easily observable and should be monitored. The examples given provide guidance to rail transit systems to develop their rule compliance verification programs. These examples can be used or adapted at the discretion of the RTS.

Rule compliance monitoring for employees reporting for work

Employees shall be checked daily prior to starting their shifts by either supervisory or administrative personnel. Employees reporting for work shall be reviewed to ensure they are:

- In prescribed uniform;
- Properly equipped (manifest, rule book, flashlight, radio, etc.), and;
- Fit for duty.

Rule compliance checks conducted while employees are in performance of their duties

Employees shall be checked for rule compliance during the performance of their jobs. Supervisors should perform compliance checks routinely while making their field visits. In addition, other trained observers (e.g., the RTS's quality assurance organizational element, system safety or consultants) can supplement compliance checks by periodically checking performance. Compliance checks may be performed based upon other operational deficiencies regardless of the source (complaints, claims, etc.).

Train operating employee rule compliance checks should include, as applicable:

- Schedule adherence;
- Door operation;
- Prescribed announcements;
- Prescribed uniform;
- Work equipment;
- Communications protocol;
- Cab condition;
- Operation (smooth operations, signal compliance, speed compliance);
- Yard operation;
- Non-routine operation such as troubleshooting or recovery procedures;
- Customer interaction;
- General operating standards; and
- Pre-departure inspections.

Automated methods of monitoring rule compliance

Some RTSs have automated means of monitoring rule compliance. The following elements should be monitored to the extent the RTS's capabilities permit:

- On-time terminal dispatches;
- Authorized train operation;
- Proper train operations;
- Proper vehicle speed;
- Signal conformance; and
- Use of operating/safety devices.

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Definitions

compliance check: Observations of individual performance by a trained observer.

rail transit system (RTS): The organization that operates rail transit service and related activities. Also known as the transit system, transit agency, operating agency, operating authority, transit authority and other similar terms.

Abbreviations and acronyms

APTA	American Public Transportation Association
FRA	Federal Railroad Administration
RTS	rail transit system

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