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Infrastructure and Systems Security
Working Group

System Prohibition and Denial of Service for Crime and Misconduct

Abstract: This recommended practice provides information, considerations and recommendations to help public transportation agencies explore, resource and implement policies and procedures to suspend or deny service to individuals for criminal activity and misconduct.

Keywords: code of conduct, criminal conduct, exclusion, misconduct, prohibition, security, suspension, transit dependent riders

Summary: This recommended practice provides considerations and recommendations for transit agencies on prohibiting individuals from transit systems due to crime and misconduct.



Foreword

The American Public Transportation Association is a standards development organization in North America. The process of developing standards is managed by the APTA Standards Program's Standards Development Oversight Council (SDOC). These activities are carried out through several standards policy and planning committees that have been established to address specific transportation modes, safety and security requirements, interoperability, and other topics.

APTA used a consensus-based process to develop this document and its continued maintenance, which is detailed in the [manual for the APTA Standards Program](#). This document was drafted in accordance with the approval criteria and editorial policy as described. Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

This document was prepared by the Infrastructure and Systems Security Working Group as directed by the Security and Emergency Management Standards Policy and Planning Committee.

This document 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 recommended practices or guidelines contained herein is voluntary. APTA standards are mandatory to the extent incorporated by an applicable statute or regulation. In some cases, federal and/or state regulations govern portions of a transit agency's operations. In cases where there is a conflict or contradiction between an applicable law or regulation and this document, consult with a legal adviser to determine which document takes precedence.

This is a new document.



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Introduction

This introduction is not part of APTA SS-ISS-RP-011-26, "System Prohibition and Denial of Service for Crime and Misconduct."

APTA recommends the use of this document by:

- individuals or organizations that operate public transit systems;
- individuals or organizations that contract with others for the operation of public transit systems; and
- individuals or organizations that influence how public transit systems are operated (including but not limited to consultants, designers and contractors).

Scope and purpose

The primary goal of this document is to provide considerations and applications to help transit agencies explore, resource and implement policies and procedures to suspend or deny service to individuals for criminal activity and misconduct.

System Prohibition and Denial of Service for Crime and Misconduct

1. Overview

Misconduct, violence and other criminal incidents on public transit can compromise the security and safety of passengers, transit employees and the community and have adverse impacts on ridership and operations. Transit systems generally reserve the right to limit, suspend or deny individuals access to services for behavior deemed to be illegal or otherwise prohibited. By implementing policies to deny service to individuals who demonstrate criminal misconduct or other prohibited behavior on transit systems, transit agencies can strengthen system and individual safety and security.

Ultimately, there is no one-size-fits-all approach for individual prohibition or denial practices within transit systems. Considerations that may influence a transit agency's implementation of a system prohibition program and specific practices may include the following:

- an agency's and/or jurisdiction's level of tolerance for misbehavior and risk
- an agency's existing code of conduct
- federal, state and local laws and regulations, especially across jurisdictions and modes served (e.g., rail, maritime)
- local political environment and dynamics

Each transit agency should conduct and document a security risk assessment of its system and use the output as a guide to determining considerations for a prohibition policy. The assessment should be holistic and consider the total transit and local threat environment. See APTA SS-SIS-S-017-21, "Security Risk Assessment Methodology for Public Transit," for additional information about methodologies to determine security risk in public transportation systems.

1.1 Definitions

Criminal misconduct includes but is not limited to acts of physical and sexual violence and abuse, threats against transit operators or patrons, thefts and robberies, and illegal drug offenses. Criminal misconduct can also be defined by felonies or misdemeanors committed within transit grounds or aboard transit systems. Policies should address fare-paying riders and customers as well as those entering transit systems to commit offenses or use the service in ways not intended (e.g., in violation of an agency code of conduct).

When enacting policies and procedures to deny or suspend individuals from service, transit agencies should specify that their prohibition policy addresses individuals committing offenses that directly impact the safety and security of the transit system in cases when other preemptive measures to minimize their impact have been rendered ineffective. Transit agencies should specify that prohibition or prohibition policies do not target or adversely impact any particular group of individuals.

The following definitions apply within this document.

- **Code of conduct:** A set of rules established by a transit agency to ensure safe and secure use of transit services and facilities for transit customers, employees, and the public.
- **Prohibit/prohibition, suspend/suspension, exclude/exclusion, ban and deny/denial:** A transit agency activity or policy that effectively prohibits individuals from using or entering the transit system permanently or for specified periods of time and/or durations.
- **Ejection/expulsion:** The immediate removal of an individual from a transportation facility.
- **Transit-dependent person:** A person who has no independent source of transportation and relies solely on public transit for trips of necessity, including but not limited to travel to and from medical or legal appointments; school or training classes; places of employment; or places to obtain food, clothing and necessary household items.

2. Stakeholder identification and outreach

When developing and implementing a service prohibition or denial program, transit agencies should work with internal and external stakeholders who may have responsibilities and/or perspectives on program development and enforcement. Transit systems implementing suspension or denial programs should consider the “full circle” of transit user behavior to identify stakeholders. The full-circle approach answers questions that include the following:

- What are the needs of the transit user?
- Who can provide for or meet the needs of the transit user if the transit agency cannot?
- Can the transit user’s behavior be modified or supported by a community partner?
- How will (or should) others be aware of the transit agency’s experiences with this behavior?
- Who is responsible for addressing unauthorized behavior?

The full-circle approach addresses the role of the transit user in the service prohibition program to identify other stakeholders who may play a role in addressing, resolving or responding to prohibited behavior and service suspension enforcement.

2.1 Internal stakeholders

Transit agencies should assign a suspension project manager or coordinator to supervise and manage the program. Program staff should identify key internal stakeholders to assist with program planning, implementation and evaluation. Internal stakeholders should include transit agency staff from all relevant departments, which may include security, legal, policy, safety, operations and paratransit.

2.2 External stakeholders

Transit agencies should consider who the suspension policy may impact and conduct proactive outreach with affected populations and organizations prior to implementing the policy. As transit-dependent riders may be most significantly impacted by service suspensions, transit agencies should engage with organizations that serve their region’s transit-dependent riders. Such organizations may include school districts, paratransit, health/medical organizations, social services, religious groups, large employers and immigrant support organizations. Transit agencies should engage other transportation organizations to advance alternatives to public transit for suspended users.

Transit agencies should engage legal, judicial and enforcement partners with responsibilities to apply, adjudicate and enforce laws and regulations related to individuals’ behavior and suspension. Close coordination with judicial and law enforcement partners should ensure the development of lawful and fair exclusion programs. Collaboration with legal partners may also help identify opportunities to improve

enforcement (e.g., assigned prosecutors and hearing officers). Similarly, transit agencies should collaborate with public and community organizations (e.g., citizen advisory committees and community groups, especially those working with people with mental health and cognitive challenges or experiencing homelessness) to solicit feedback, consider oversight and encourage community buy-in.

Additionally, transit agencies should work with other transit agencies and transportation partners to develop procedures and agreements to share information about banned individuals, unless standards such as Health Insurance Portability and Accountability Act (HIPAA) restrictions prohibit sharing. As applicable, transit agencies may engage regulators to seek reciprocal prohibitions for excluded individuals for certain violent offenses (e.g., operator assaults) and consider other legal avenues (e.g., gain access to DMV information) to create a strong program, in accordance with federal, state, local and agency privacy regulations; law enforcement “need to know”; and due process regulations and norms.

3. Preliminary activities

Before instituting a service prohibition or suspension for criminal misconduct, transit authorities should review all existing policies and practices currently in place and ensure that suspension and prohibition policies work within the existing security frameworks.

Before enacting exclusion policies, transit agencies should consider the following:

- The objective of exclusion policies is to enhance the safety and security of transit systems by modifying and correcting inappropriate behavior. To be effective, operator, supervisor and security personnel discretion and judgment is essential, which means transit personnel should have strong training and a clear understanding of the purpose of the exclusion policy. Along with training on the exclusion policy, agencies should also provide employees with conflict resolution and de-escalation training to help defuse potentially dangerous interactions. See APTA SS-SEM-RP-020-25, “Transit De-Escalation Policy and Training,” for additional information on de-escalation training considerations.
- Transit agencies should carefully consider the enforcement of exclusion policies to avoid creating or worsening existing problems such as operator assaults.
- Transit agencies should publicize exclusion policies and related standards (e.g., codes of conduct) broadly before starting to implement suspension and exclusion policies. Transit agencies should also communicate the reasons for and benefits associated with exclusion policies. Transit agencies should use various communication channels, including social media, local news, public meetings, and publications offered in multiple languages, to inform the public of the policy and its enforcement.
- Transit agencies should assess and consider using existing surveillance technology, communication systems and emerging technologies such as video analytics to support enforcement.

3.1 Agency responsibilities

Agencies should consider and clearly define the types of offenses covered under the exclusion policy (e.g., drug sales, assaults, threats). Once a person has been arrested or cited for one of the listed offenses, transit agencies should have no discretion in issuing a prohibition order. Transit agencies should collaborate with internal and external partners to develop appropriate policies to target criminal misconduct. In particular, transit agencies should consult and collaborate with transit police and/or local law enforcement agencies and community organizations.

Transit agencies should ensure that no specific group of riders or individuals is unfairly targeted for suspension or prohibition. They should leverage an oversight committee of community stakeholders with experience in the areas of mental health, homelessness, public safety and cultural awareness to monitor the

number of exclusions and work with transit authorities to provide recommendations on training for transit personnel.

3.2 Legal and enforcement considerations

Transit agencies should ensure that exclusion policies are lawful and comply with relevant federal, state, local and/or tribal regulations and requirements. Transit agencies should consider the following:

- Understand all legal implications of criminal rider and individual misconduct currently in place within the transit agency service area. This is especially important for intermodal systems and systems that cross multiple jurisdictions.
- Ensure that suspension notices inform riders and others that failing to comply with the terms of the suspension may lead to increased consequences, including potential criminal charges.
- Incorporate an appeals process that provides due process (e.g., adequate notice, a meaningful hearing).
- Understand and validate how the transit agency will work with transit police and/or local law enforcement to enforce its exclusion policies. Transit agencies should consider competing law enforcement priorities, resource constraints and jurisdictional differences. They should partner with law enforcement to establish shared expectations for confronting excluded individuals and dealing with misconduct. Close coordination and collaboration with law enforcement can help to create successful programs.
- Consider adopting a progressive penalty system for non-violent code of conduct violations. A first offense may warrant a written warning, particularly for nonviolent incidents that do not involve injury or property damage. A second offense could result in being assigned customer and/or rider training prior to being allowed to ride public transit or enter transit system spaces. A third offense could result in a temporary ban lasting a few hours. Subsequent offenses may lead to progressively longer bans—ranging from hours to days—culminating in a permanent ban for repeated violations.

4. Policy and procedural considerations

Transit agencies should address a number of policy and procedural considerations when implementing prohibition and denial-of-service programs. Considerations include notification requirements, staff roles and responsibilities, operator procedures, law enforcement coordination, violator notification methods, exclusion criteria, and the appeals process. Programmatic considerations promote fair, effective and legally sound enforcement of transit system rules and codes of conduct.

4.1 Codes of conduct

Passenger codes of conduct help transit agencies establish guidelines to facilitate safe and secure transit for transit employees, passengers and the community. Transit agencies should have a comprehensive passenger code of conduct that defines expectations for passenger behavior and potential penalties for violations, tailoring their code of conduct to align with their environment; community; transit system policies; and applicable federal, state and local laws and regulations.

See APTA's "Code of Conduct Resources" web page for example codes of conduct from North American transit agencies.

4.2 Public notification

Transit agencies should proactively notify customers that adherence to the agency's code of conduct is a condition of use for transit services and that violations of agency policies, including criminal activity and serious misconduct, may result in suspension or denial of service. Notifications and communications should

be simple, understandable and accessible in multiple languages, as appropriate to the agency's customer and community demographics.

Public notification methods may include signage, website notices, social media posts, customer service messaging and public announcements. In the system itself, transit agencies should provide clearly displayed, strategically located and visible signage that outlines the system's code of conduct and policies. Signage locations may include stations and stops, platforms, revenue vehicles, and other public and frequently visited sites. Transit agencies should consider using features such as QR codes to provide individuals convenient access to further details on their personal devices.

4.3 Employee roles and responsibilities

Transit agencies should ensure that all employees understand transit agency policies regarding customer conduct and the procedures for addressing violations. Employees should be aware of their roles and responsibilities, specifically distinguishing between the responsibility to inform versus enforce:

- **Inform:** Operators and frontline employees are responsible for informing customers of transit rules and violations, recording incidents when necessary, and notifying supervisory or security personnel.
- **Enforce:** Enforcement actions, including removal or exclusion from the system, should be the responsibility of designated security and/or law enforcement personnel, not operators or frontline staff.

Transit employees (e.g., train/bus operators, janitorial staff, station attendants) should not attempt to physically enforce any ordinances, laws or agency policies. A transit employee may inform individuals of rule violations and/or report the incident to security or law enforcement personnel, dispatch, or operations control. Prompt reporting facilitates prompt deployment of security or law enforcement personnel. See APTA SS-SEM-RP-020-25, "Transit De-Escalation Policy and Training," for additional information on de-escalation policies and recommendations.

Upon operator request or similar notification, the Operations Control Center (OCC), Security Operations Center (SOC), Dispatch Center, or equivalent component should coordinate with transit police or local law enforcement to deploy security or law enforcement personnel to enforce agency policies. Law enforcement's role is to support the safe operation of the transit system while balancing broader public safety obligations within the jurisdiction.

Transit agencies should provide operators, frontline staff, security and law enforcement personnel, and other relevant staff training during initial onboarding and annual refresher courses on roles and responsibilities regarding observing, documenting and reporting misconduct and violations. Furthermore, security and law enforcement personnel should receive training on documenting and enforcing agency policies and procedures regarding violations and system suspension.

4.4 Exclusion procedures

Transit agencies should document policies and procedures related to enforcing system suspensions. Exclusion considerations include the following:

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- **Transit employee and law enforcement coordination:** Transit agencies should implement coordinated enforcement procedures for exclusion or banning orders. This includes sharing identifying information (e.g., names, photographs) with internal staff, transit security and local law enforcement. Transit agencies can share information on banned individuals via briefings during regular meetings, flyers on physical boards, and internal webpages. Agencies equipped with an onboard monitoring system can use video footage to assist in identifying excluded individuals. When such individuals are detected, operators/drivers should alert dispatch, which will initiate the appropriate response, either through agency leadership or direct police contact.
- **Violator notification:** Transit agencies may provide violators with verbal warnings or commands to cease inappropriate behavior. Security or law enforcement personnel may issue formal notifications in person, during law enforcement custody, or by certified or registered mail. Written notices should include details of the violation; the code or policy violated; incident date, time and location; and length of the exclusion.
- **Exclusion criteria:** Transit agencies should develop clear criteria for exclusion, including thresholds for the number or severity of offenses. Lengths of exclusion may vary based on the type and frequency of offenses, up to and including lifetime bans for serious violations involving violence or repeated criminal behavior.
- **Appeals process:** Transit agencies should provide individuals subject to exclusion a fair and accessible appeals process. The appeals process should provide a meaningful opportunity to contest the exclusion, in compliance with due process standards. Transit agencies should consider accessibility during the appeals process and offer opportunities to appeal in person, by mail and remotely. Transit agencies should consider modifications to exclusion orders for “trips of necessity” for individuals who rely on transit for necessary travel, including access to healthcare, legal services, education, employment, and basic needs such as food and clothing.
- **Protection of Information:** Transit agencies should ensure that all programmatic documentation, including the collection and sharing of personal information about excluded individuals, comply with requirements and regulations associated with safeguarding information. For instance, some agencies may reside in jurisdictions that limit information sharing on juveniles. National information protection programs to review and incorporate include Protected Health Information (PHI) and other Personally Identifiable Information (PII).

4.5 Program evaluation

Transit agencies should require analysis and reporting on suspensions to facilitate program evaluation and updates. They should collect and assess relevant programmatic data, information and observations via firsthand observations, hearings and judicial proceedings, and other avenues to identify trends and changes to sustain and improve the program. They should assess their programs to ensure that there are no disparate impacts on vulnerable or minority populations and adjust policies accordingly. Transit agencies should also regularly seek feedback, regulatory updates and best practices from employees, relevant local partners and industry peers.

5. Alternatives to system prohibition and other considerations

Some agencies may choose to avoid or be unable to implement system suspension and denial-of-service programs due to limitations in local or state regulations or because of an agency’s own policies. Alternative programs may include the following:

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- **Close coordination with local or state law enforcement and court systems:** Transit agencies may partner with local or state law enforcement and court systems to identify avenues to deal with repeat violators of local and/or state laws. When violators are arrested or receive citations for violating local or state laws, transit agencies should coordinate with the court system and law enforcement to ensure that these courts properly adjudicate violations. Transit agencies should seek to leverage, where appropriate, court systems' ability to ban violators from public transportation via "stay away" orders or probation conditions. Transit agencies could also request diversion or probation, as necessary.
- **Noncriminal interventions:** Transit agencies should partner with local social service agencies or probation officers to attempt to find alternative solutions to address behavior that cannot be resolved by arrest or citations. Similarly, transit agencies should pursue family member interventions, especially for juveniles, to correct misbehavior and address violations. Attempting to contact the guardians of juveniles who have been issued prohibition orders to offer additional support and resources to these families may prevent future involvement in activities that could lead them into the criminal justice system. See APTA SS-ISS-RP-008-24, "Use of Unmanned Aircraft Systems in Support of Transit Security and Emergency Management," for information about New York City's approach to leverage families to discourage "train surfing."
- **Progressive approach to violations:** Agencies may pursue a progressive approach to violations that proceeds from verbal and written warnings to civil citations to criminal enforcement. For civil citations, transit agencies may incorporate alternatives to paying fines. Programs can also incorporate progressive prohibition timelines that advance from short-term suspensions to lifetime bans.
- **Non-public transport options:** Some jurisdictions may provide publicly funded alternatives to public transit to move transit-dependent individuals who have been banned from public transit.

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Related APTA standards

APTA SS-SIS-S-017-21, “Security Risk Assessment Methodology for Public Transit”

APTA SS-SEM-RP-020-25, “Transit De-Escalation Policy and Training”

APTA SS-ISS-RP-009-25, “Use of Unmanned Aircraft Systems in Support of Transit Security and Emergency Management”

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Abbreviations and acronyms

DMV	Department of Motor Vehicles
HIPAA	Health Insurance Portability and Accountability Act
OCC	Operations Control Center
PHI	Protected Health Information
PII	Personally Identifiable Information
SDOC	Standards Development Oversight Council
SOC	Security Operations Center

Document history

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