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Rail Transit Operating Practices Working Group

Rule-Compliance Program Requirements

Abstract: This standard outlines the basic elements of a rule-compliance program needed to verify adherence to rail transit operating rules. Its principles are applicable in other aspects of rail transit management, such as maintenance, operations control/dispatch and supervision.

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

Summary: This standard provides minimum rule-compliance requirements for rail transit systems to ensure that their approved operating rules are implemented and followed according to the standard stated within the rule.



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 Rail Transit Operating Practices Working Group as directed by the APTA Rail Transit Standards Policy 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. 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 system'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 document supersedes APTA RT-OP-S-011-10, Rev. 2, which has been revised. Below is a summary of changes from the previous document version:

- Document formatted to a new APTA standard style.
- Made minor changes to spelling, capitalization and grammar.
- Sections have been renumbered and moved.
- Foreword, including "Scope and purpose," added to document.
- Scope and purpose: Added the following language: "In order to ensure that the objectives of the rules and procedures are met, rail transit systems must develop and implement formal programs to measure employee compliance and respond appropriately to the results."
- Updated working group membership list.
- Global changes made to replace the words "should" and "may" to "shall."
- Section 2: The word "definition" in the title changed to "framework."
- Section 2.1: Added the following language: "At a minimum, the rail transit system shall develop a rule-compliance program that evaluates the performance of operations personnel, including train operators, controllers, supervisors and others in the chain of command as determined by the rail transit system. Jobs and functions to be considered shall include but not be limited to other workers engaged in safety-sensitive tasks, as deemed by the rail transit system. The rail transit system shall require supervisors, managers and other designated personnel to perform evaluations for the rule-compliance check process per the system's program requirements. The rail transit system shall also identify what responsibilities for rule compliance reside within the Safety Department. The rail transit system shall define a method to identify the rules evaluated as part of its rule-compliance program. At a minimum, the program shall include rules that the rail transit system has identified as being safety-critical or associated with accidents and incidents on the property and in the industry."



- Section 2.3: Section title changed from “Evaluation cycle” to “Frequency of compliance checks conducted.”
- Section 2.5, “Recordkeeping,” changed to Section 2.8, “Data management.”
- New Section 2.5, “Evaluation of data and trend analysis.”
- Sections 3 and 3.1 replaced with a new Section 2.9, “Validation/analysis of rule-compliance program effectiveness.”
- Section 3.2 changed to Section 3, “Rule-compliance checklists.”



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Introduction

This introduction is not part of APTA RT-OP-S-011-10, “Rule-Compliance Program Requirements.”

APTA recommends the use of this document by:

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

Scope and purpose

This standard applies to rail transit systems that operate streetcars and 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. 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. In order to ensure that the objectives of the rules and procedures are met, rail transit systems must develop and implement formal programs to measure employee compliance and respond appropriately to the results.

Note on 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. A rail transit system may develop alternates to APTA standards so long as the alternates are based on a safe operating history and are described and documented in the system’s safety program plan (or another document that is referenced in the system safety program plan).

Documentation of alternate practices shall:

- 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; and
- describe and substantiate how the alternate methods do not compromise safety and 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 with 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.

Rule-Compliance Program Requirements

1. General requirements

The rail transit system shall develop a formal program that promotes the comprehension of rail transit system rules, as well as to measure and enforce employee adherence to established system rules, also including but not limited to procedures, operating bulletins, special orders and similar documents. For the purposes of this standard, the term “rules” shall encompass the elements listed above. A comprehensive rule-compliance program provides rail transit system management with data that can help understand safety and meet safety assurance goals of the safety management system.

The implementation and use of rules are benefitted by periodic review and follow-up. Each rail transit system shall develop a formal process of observations to evaluate and verify that rules are followed.

The rail transit system shall enact a rule-compliance program in order to meet, at a minimum, the following objectives:

- Reduce accidents/incidents caused by human error.
- Improve and maintain employees’ attention to their duties.
- Determine the degree of proficiency in rules comprehension.
- Identify areas of improvement for employee rule adherence.
- Increase communication and instruction with employees for proper rule compliance.
- Perform rule-compliance testing in a manner that is unobtrusive and not a distraction to employees while performing their duties and responsibilities.
- Improve efficiency of operations.
- Identify trends in levels of compliance across a discipline.
- Identify near-misses that could be addressed through individual or system-wide corrective action.

In the formal policy, program and/or procedures, the rail transit system shall define the rule-compliance requirements to verify and evaluate that its rules are followed. The rule-compliance program shall include the following elements:

- Program content (Section 2.1)
- Organizational responsibility (Section 2.2)
- Frequency of compliance checks conducted (Section 2.3)
- Method of verification (Section 2.4)
- Evaluation of data and trend analysis (Section 2.5)
- Corrective action (Section 2.6)
- Impacts of changes to rules (Section 2.7)
- Data management (Section 2.8)
- Validation/analysis of rule-compliance program effectiveness (Section 2.9)

In developing a rule compliance program in accordance with the provisions of this standard, the rail transit system shall scale its rule compliance program and structure the program to fit the needs and abilities of the transit system.

2. Compliance program framework

2.1 Program content

The rail transit system shall define which job classifications and job functions will be evaluated.

At a minimum, the rail transit system shall develop a rule-compliance program that evaluates the performance of operations personnel, including train operators, controllers, supervisors and others in the chain of command as determined by the rail transit system. Jobs and functions to be considered shall include but not be limited to other workers engaged in safety-sensitive tasks, as deemed by the rail transit system.

The rail transit system shall require supervisors, managers and other designated personnel to perform evaluations for the rule-compliance check process per the system's program requirements. The rail transit system shall also identify what responsibilities for rule compliance reside within the Safety Department.

The rail transit system shall define a method to identify the rules evaluated as part of its rule-compliance program. At a minimum, the program shall include rules that the rail transit system has identified as being safety-critical or associated with accidents and incidents on the property and in the industry.

The rail transit system shall establish a process to evaluate the effectiveness of rail transit system administration of rule-compliance program requirements.

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

2.2 Organizational responsibility

The rail transit system shall define which part(s) of the organization shall administer the rule-compliance process or programs administered by different departments.

The rail transit system shall coordinate rail operations rule-compliance check activities conducted among departments. The rail transit system shall define the minimum level of qualification required to perform the function of an evaluator.

The rail transit system shall identify how those responsible for leading the auditing will manage the data and the results thereof.

The rail transit system shall identify how compliance programs administered by different departments—for example Transportation Department and Safety Department—coordinate their efforts and the results of audits performed.

2.3 Frequency of compliance checks conducted

The rail transit system shall establish a method to set departmental goals for the number and type of compliance checks performed.

The rail transit system shall establish minimum requirements for the number of rule-compliance checks that shall be performed on or by different employee types.

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The rail transit system shall establish a method to evaluate the conduct of compliance checks to determine if these goals are being accomplished.

2.4 Method of verification

In determining the method of rule-compliance verification, the rail transit system shall consider characteristics such as different shifts, 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 personnel performing their duties. These observations may be performed announced or unannounced.

Compliance checks shall be performed in a methodical, objective manner. The means of collecting data (e.g., paper or electronic forms) shall be standardized, along with specific instructions for conducting the compliance checks.

Observers shall be trained in the rule-compliance program and its methods of collection and proper documentation of the observations.

The rail transit system shall determine the minimum training and qualifications requirements for individuals performing rule-compliance observations. The rail transit system shall determine requirements for initial, periodic refresher or other means of training as it relates to the administration of rule-compliance check program requirements.

The rail transit system 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 rail transit system shall establish a procedure of periodic review of rule-compliance check activities. The review should include, at a minimum:

- number of checks performed;
- type of checks conducted;
- time of day of checks;
- locations of checks;
- employees checked;
- people conducting the checks; and
- results of the checks.

The rail transit system shall have a methodology for analyzing the results.

In addition to the verification noted above, the rail transit system shall establish and implement a process for an internal or external independent (other than the entity designated to conduct compliance checks) review of the compliance-check program.

2.5 Evaluation of data and trend analysis

The rail transit system shall compile and evaluate the results of the rule-compliance program using trend analysis, hazard analysis, industry practices and any other evaluation methods and tools as determined by the rail transit system.

The rail transit system shall consider the format of data being gathered so that it can be useful for developing and performing trend analysis.

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The rail transit system shall periodically review its rule compliance outcomes to evaluate the overall effectiveness of the rule compliance program versus operating performance outcomes. This includes considering the results related to employee adherence to existing rules, as well as analysis of the sufficiency of the existing rules and procedures.

2.6 Corrective action

The rail transit system shall develop a process for addressing and tracking noncompliance with rules and the associated corrective action(s).

The rail transit system shall establish quantifiable metrics for assessing compliance and the associated corrective actions to address instances of noncompliance. Corrective actions shall be administered in a timely manner, commensurate with the severity of the noncompliance.

2.7 Impacts of changes to rules

When rules change, the rail transit system shall identify how changes will be addressed by the rules compliance program and if new or updated rules will be audited differently or incorporated into existing rules compliance programs.

The rail transit system shall ensure that all affected stakeholders are involved in conducting evaluations of rule changes and their effects on the rule compliance program.

2.8 Data management

The rail transit system shall maintain records of compliance observations, data and trend analysis, and corrective actions.

The rail transit system shall develop a consistent structure for data management and evaluation of records. Examples of methods may include any of the following:

- electronic databases with trend analysis charts
- spreadsheets
- paper files
- summary reports

2.9 Validation/analysis of rule-compliance program effectiveness

The rail transit system shall develop and administer a process for periodically evaluating the effectiveness of the rule-compliance program, to include but not be limited to assessment of trend analysis data and the implementation of corrective actions and their effectiveness.

The rail transit system shall establish a frequency at which it conducts reviews of the rule-compliance program effectiveness.

3. Rule-compliance checklists

The rail transit system shall develop position-specific checklists of activities as part of a rule-compliance program for operators, controllers and supervisors.

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Position-specific checklists shall include but are not limited to the following categories and as appropriate for each position:

- rules
- train operations
- signals
- communications
- documentation
- customer relations
- roadway worker protection
- pass-down/turnover
- compliance checks
- incident management

The rail transit system shall develop rule-compliance checklists for other personnel as deemed appropriate.

4. Communication of program effectiveness

The rail transit system shall ensure that employees are informed of why the rule compliance program is in place and how the results are used to safely manage service and that it is not intended as a punitive program. The rail transit system should have processes in place to communicate the effectiveness of the program.

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Definitions

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

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

Abbreviations and acronyms

FRA Federal Railroad Administration

Document history

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