



# Fitness for Duty (FFD) Program Requirements

**Abstract:** This document provides standards for the development and administration of a fitness for duty program for rail transit system for individuals operating rail vehicles and other on-track equipment.

**Keywords:** fitness for duty, pre-employment physicals

**Summary:** Rail transit system operating employees are responsible for the safe movement of trains and the ability to safely complete related job tasks. Critical to the safe movement of the train and to working in the demanding conditions of operating a train or working around the train is employee fitness for duty. Rail Transit Systems establish fitness for duty requirements for operating employees to ensure that employees who are hired are capable of operating vehicles, as well as evacuating trains, working in the rail environment around trains, and conducting other activities that may require certain physical characteristics or abilities. Fitness for duty also encompasses a program of assurance that an operating employee is capable on any given day to competently and safely carry out the duties of the job with no physical conditions that would otherwise affect his/her ability to complete the work as required.

**Scope and purpose:** This standard applies to RTSs that operate light rail, heavy rail or rail subway systems. The standard does not apply to commuter railroads that operate on the general railroad system regulated by the Federal Railroad Administration. The standard provides minimum requirements for fitness for duty requirements for operating employees of rail vehicles or on-track equipment to ensure the employee is ready for duty. The standard includes requirements for pre-hiring qualifications; RTS responsibilities for administering fitness for duty; program requirements; and program management. This standard does not include Reporting for Work or Hours of Service (HOS) requirements. These are addressed in the Standard for Operating Personnel Report to Work (RT-OP-S-014-04) and the Standard for Train Operator Hours of Service Requirements (RT-OP-S-015-09).

The purpose of this Standard is to establish baseline requirements for a fitness for duty program so that rail transit systems may formalize measures to hire rail vehicle and on-track equipment operators who are able to perform physical job duties and to continually monitor employees to help ensure they are fit for duty.

This *Rail Standard* 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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The APTA Operating Practices Work Group recognizes that Fitness for Duty is both a complicated and important subject for rail transit. This Standard will not be considered in effect until two years from the date of its approval. This schedule is set so that each RTS may make changes to rules and policies in accordance with labor agreement requirements. Some RTSs may comply sooner than others, but it is expected that each RTS will take the necessary steps to develop an implementation plan for this Standard within two years of this Standard's approval.



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## Introduction

*This introduction is not part of RTS-S-OP-018-12 “Fitness for Duty”*

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

## Note on alternate practices

Individual rail transit systems (RTSs) may modify the practices in this standard to accommodate their specific equipment and mode of operation. APTA recognizes that some RTSs may have unique operating environments that make strict compliance with every provision of this standard impractical. As a result, certain RTSs may need to implement alternatives to these standards and practices. An RTS may develop alternates to the APTA standards as long as the alternates are based on a safe operating history and are described and documented in the RTS’s System Safety Program Plan (SSPP) or another document that is referenced in the SSPP).

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 to railroads (e.g. Amtrak, commuter, freight rail, etc). 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.

# Fitness for Duty Program (FFD) Requirements

## 1. Creation of FFD Program

The RTS shall develop a formal FFD program that applies to all operators, or any other person identified by the RTS in the FFD program. The RTS shall require all individuals who may operate a train during their time on duty to comply with FFD program requirements. The RTS shall develop an FFD program that incorporates the information contained in this Standard. This shall include, at a minimum:

- Physical and Medical Qualifications;
- Pre-Selection as Operator Requirements;
- On-the-Job Requirements;
- Return-to-Duty Requirements.

### 1.1 Qualifications – Physical

The RTS shall identify physical requirements related to safe train operation. The RTS shall develop a list of minimum requirements related to the rail vehicle operator position, or any other positions for which the FFD Program applies.

### 1.2 Qualifications – Medical

The RTS shall identify medical qualifications related to safe train operation. The RTS shall develop a list of minimum requirements related to the rail vehicle operator, or any other positions for which FFD Program applies.

## 2. Pre-Selection Requirements

The RTS shall establish a program that identifies baseline FFD requirements for all potential operators.

The RTS shall address requirements for candidates moving into a position involving the movement of trains. This shall include but not be limited to the following:

- Ability to safely access and operate a train or other on-track equipment;
- Ability to board and alight train and walk in all types of trackways;
- Ability to implement a train evacuation.

Each RTS has its own unique physical characteristics. The RTS shall determine those unique physical characteristics which result in unique physical ability requirements, and the RTS shall include these requirements in its FFD Program.

Examples of other desirable qualities that the RTS may wish to consider are contained in Annex A of this Standard.

### 2.1 Pre-Selection Qualifications – Physical

The RTS shall develop an FFD Program requiring compliance with physical requirements as a prerequisite for an employee being hired or transferred into a position covered by the RTS FFD Program.

## 2.2 Pre-Selection Qualifications – Medical

The RTS shall develop an FFD Program requiring compliance with medical requirements as a prerequisite for an employee being hired or transferred into a position covered by the RTS FFD Program.

## 2.3 Pre-Selection Assessment

The RTS shall establish a method of assessing a potential new hire's compliance with RTS FFD Program requirements.

## 3. On-the-Job Requirements

The RTS shall establish an FFD Program that contains the baseline on-duty FFD requirements for all operators.

### 3.1 Routine FFD Medical Examinations

The RTS's FFD Program shall require that all operators undergo regular medical examinations to ensure that their general physical health makes them fit for duty. The RTS shall establish standards for initial medical certifications and recertifications.

### 3.2 Regular FFD Checks

The RTS shall establish a Program that describes the process for ensuring that operators are assessed for fitness for duty prior to and/or during their shift on a regular basis.

The RTS's FFD Program shall describe if requirements apply to individual employees (e.g. each employee shall be checked daily) or if requirements apply to a sample of employees (e.g. 10% are checked monthly).

### 3.3 Employees Responsibilities for Reporting Unsafe Conditions

The RTS's FFD Program shall describe requirements for all employees to report observations and/or incidents and take appropriate action, in order to prevent an operator from taking control of a train, or performing other duties that could endanger the employee, the passengers or the public at large.

### 3.4 Employee Self-Reporting Requirements

The RTS FFD Program shall describe the protocol operators must follow in self reporting FFD compliance. The policy shall include the following:

- Process for self-reporting medication use that may affect ability to perform work (related to Drug & Alcohol Policies)
- Process for self-reporting fatigue or other issues that may distract an employee
- Guidance related to follow-up actions and RTS monitoring of employees who self-report issues

### 3.5 Triggering Events that Require Additional FFD Assessments

The RTS shall develop a policy that states which types of events may cause the RTS to conduct additional or modified FFD checks. Such a policy may apply to an individual employee as a result of a specific incident or pattern of events. Such a policy may apply to all employees based on findings that result from a specific incident or pattern of events.

## **4. Program Administrative Requirements**

### **4.1 Identification of FFD-Applicable Positions**

The RTS shall list all employee classifications subject to the FFD Program.

### **4.2 Designation of FFD Administration and Oversight**

The RTS shall designate supervisory personnel as responsible for administering the FFD Program and shall designate managers as responsible for overseeing the program in accordance with RTS requirements.

### **4.3 Supervisor and Management Responsibilities**

The RTS shall describe the training and qualification requirements for supervisory personnel or others charged with administering FFD Program requirements.

The RTS shall describe the responsibilities assigned to supervisory personnel or other employees for assessing an operator's compliance with the RTS's FFD Program requirements.

### **4.4 Reverification of FFD**

The RTS shall establish a frequency, not to exceed every five years, for verifying that operators meet the baseline FFD requirements.

### **4.5 Reinstatement of Duties / Return to Work**

The RTS shall establish threshold requirements for testing and certifying operator fitness for duty for employees returning to work or to a specific duty after an extended absence. The RTS shall define the time frame that requires new testing/certification and shall define specific testing and/or certification requirements.

### **4.6 Follow-Up Actions**

The RTS shall establish follow-up actions for non-compliance with the FFD Program.

### **4.7 Documentation**

The RTS shall determine what documentation is required for on-the-job FFD checks.

## **5. Training and Awareness**

The RTS shall incorporate FFD Program requirements into training programs for operators.

The RTS shall develop training and or awareness materials to familiarize operators with the subject of fitness for duty and with RTS FFD Program requirements.

The RTS shall require operators to complete training and/or awareness programs. The RTS shall establish testing and/or certification requirements and shall retain records of this information for each employee.

## **6. Program Management and Update**

The RTS shall establish a methodology to assess and modify the FFD Program.

## 7. Definitions

For the purposes of this standard, the following terms and definitions apply. The job titles listed below are used in this standard for informational purposes only. It is up to the individual RTS to determine and utilize titles as it finds appropriate.

**operator:** The onboard employee who controls the movement of a train or other on-track equipment.

**pre-selection:** Process for testing suitable candidates for a specific operator position.

**rail transit system (RTS):** An organization that operates passenger train service and its supporting activities.

**train** – A rail service vehicle such as any motorcar, locomotive, or other self-propelled rail vehicle, with or without cars coupled.

## 8. Abbreviations and acronyms

APTA	American Public Transportation Association
FFD	fitness for duty
RTS	rail transit system
SOP	standard operating procedure

## 9. Summary of changes

No change as this is a new document.

## 10. Document history

Document Version	Working Group Vote	Public Comment/ Technical Oversight	CEO Approval	Policy & Planning Approval	Publish Date
First published	Sept 2012	4Q 2012	4Q 2012	4Q 2012	January 2013



## 11. Annex A – Additional Operator Job Qualifications to Consider for FFD Program

All RTSs have a variety of different unique operating conditions that may have specific requirements. The RTS may include these in the job description or other documentation outlining specific job requirements. The following is a list of additional operator job qualifications to be considered by the RTS. The following list is not intended to be a comprehensive list, and it is not intended to be a list that applies to all RTSs. The following list is presented in alphabetical order.

- Adding coupler adapters
- Boarding mobility aided customers
- Communications requirements
- Cranking/pumping pantograph
- Hearing requirements
- Lifting panels, covers, seats, etc.
- Manual application/release of brakes
- Manually uncoupling
- Standing for extended periods of time
- Stepping over third rail
- Stowing the coupler
- Subway emergency evacuation
- Throwing a switch
- Using a bridge plate
- Using emergency equipment, such as ladder or fire extinguisher
- Utilizing the third rail jumper
- Vision requirements
- Working in inclement weather