



APTA STANDARDS DEVELOPMENT PROGRAM

STANDARD

American Public Transportation Association

1300 I Street, NW, Suite 1200 East, Washington, DC, 20005

APTA RT-OP-S-018-12 Rev 1

First Published December 2012

First Revision January 4, 2019

Operating Practices Working Group

Fitness for Duty (FFD) Program Requirements

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

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 FFD. Rail Transit Systems establish FFD requirements for operating employees to ensure that employees 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. FFD 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 their ability to complete the work as required.

Scope and purpose: This standard applies to RTAs that operate light rail, heavy rail, streetcars 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 FFD requirements for operating employees of rail vehicles or OTE to ensure the employee is ready and fit for duty. The standard includes requirements for pre-hiring qualifications; RTA responsibilities for administering FFD; program requirements; and program management. This standard does not include Reporting for Work or Hours of Service requirements. These are addressed in the Standard for *Operating Personnel Report to Work* (APTA RT-OP-S-014-04), the Standard for *Train Operator Hours of Service Requirements* (APTA RT-OP-S-015-09), and *Fatigue Management Program Requirements* (APTA RT-OP-S-023-17).

This Standard establishes a baseline requirements for a FFD program so that rail transit systems may formalize measures to hire rail vehicle and OTE operators who are able to perform physical job duties and to continually monitor employees to help ensure they are fit for duty.

This rail transit system 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 recommended 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, unless referenced in federal regulations.

© 2019 The North American Transportation Services Association (NATSA) and its parent organization APTA. No part of this publication may be reproduced in any form, in an electronic retrieval system or otherwise, without prior written permission of NATSA.

The APTA Operating Practices Work Group recognizes that FFD 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 RTA may make changes to rules and policies in accordance with labor agreement requirements. Some RTAs may comply sooner than others, but it is expected that each RTA will take the necessary steps to develop an implementation plan for this Standard within two years of this Standard's approval.

Table of Contents

Participants	iv
Introduction	v
Note on alternate practices	v
1. Creation of FFD Program	1
1.1 Requirements – Physical	1
1.2 Requirements – Medical.....	1
2. Pre-Selection Requirements	1
2.1 Pre-Selection Qualifications – Physical.....	2
2.2 Pre-Selection Qualifications – Medical	2
2.3 Pre-Selection Assessment.....	2
3. Assessment of Trainees’ FFD During Training	2
4. On-the-Job Requirements	2
4.1 Routine FFD Medical Examinations	2
4.2 Regular FFD Checks	2
4.3 Employees Responsibilities for Reporting Events That May Have Been Caused by FFD Condition	3
4.4 Employee Self-Reporting Requirements	3
4.5 Triggering Events that Require Additional FFD Assessments	3
5. Program Administrative Requirements	3
5.1 Identification of FFD-Applicable Positions.....	3
5.2 Designation of FFD Administration and Oversight.....	3
5.3 Supervisor and Management Responsibilities	3
5.4 Reverification of FFD.....	3
5.5 Reinstatement of Duties / Return to Work.....	3
5.6 Follow-Up Actions	4
5.7 Documentation.....	4
6. Training and Awareness	4
7. Program Management and Update	4
Related APTA standards	5
Definitions	5
Abbreviations and acronyms	5
Summary of changes	5
Document history	6
Annex A – Additional Operator Physical Qualifications to Consider for FFD Program	7



Participants

The American Public Transportation Association greatly appreciates the contributions of the **Roy Aguilera, Susan Duffy, Martin Gulley, Joyce Rose, and Henry Woods**, who provided the primary effort in the revision of this document.

At the time this standard was completed, the working group included the following members:

Amanda Nightingale, *Chair*
Brian Riley, *1st Vice Chair*
Gary Howard, *2nd Vice Chair & Secretary*

Tony Abdallah, *MTA New York City Transit*
Ray Abraham, *Valley Metro0*
Roy Aguilera, *Bay Area Rapid Transit*
Michael Alexander, *LA Metro*
Michael Avery, *King County Metro*
Mark Benedict, *Metro Transit*
Patrick Brouard, *Atkins Global*
Michael Coplen, *Federal Transit Administration*
Victor Demmons, *MARTA*
Paul Denison, *Sound Transit*
Brian Dwyer, *STV Inc.*
Lucas Ewing, *Utah Transit Authority*
Anthony Fazio, *SEPTA*
Donald Filippi, *North County Transit District*
Kim Fjeldsted, *Utah Transit Authority*
Zandra Ford, *Baltimore MTA*
Paul Fraser, *BART*
Martin Gulley, *Bi-State Development Agency*
Deltrin Harris, *WMATA*
Melvyn Henry, *SFMTA*
Gary Hinton, *Maryland Transit Administration*
Gary Howard, *METRO (Harris County)*
Jhaun Jasper, *Chicago Transit Authority*
Keith Jones, *DC Streetcar*
Manael Kennerly Sr., *WMATA*
Linda Lee, *Atlanta Streetcar*
Cynthia Lewis, *Baltimore MTA*
Stephen Lino, *LA Metro*

Jason Lurz, *Ansaldo Honolulu*
William McClellan, *Alternative Concepts Inc.*
Pamela McCombe, *WSP*
Nicole McGann, *Metra*
Cynthia McMonagle, *Port Authority Allegheny County*
Mari Olsen, *Sound Transit*
Norman Michaud, *MBTA*
Dedric Parham, *MARTA*
James Price, *Hampton Roads Transit*
Gregory Robinson, *Miami-Dade DTPW*
Joyce Rose, *WSP*
Gerry Ruggiero, *Jacobs Engineering*
Kevin Rogers, *Niagara Frontier Transit Metro*
Harold Samms III, *JTA*
Duane Sayers, *SMART*
Ernesto Scarpitti, *Delta Railroad*
Gary Schafer, *RTD Denver*
Benjamin Simms IV, *Hampton Roads Transit*
Andrew Skabowski, *MTA of Harris County*
Allen Smith III, *HNTB*
James Smith, *Bi-State Development Agency*
William Steinmetz, *Consultant*
Russell Stone, *Dallas Area Rapid Transit*
Joseph Tassiello, *NJ Transit*
Debra Thacker, *Valley Metro*
Lisa Woodruff, *LACMTA*
Gregory Woods, *Bombardier*
Henry Woods, *MARTA*

Project team

Charles Joseph, *American Public Transportation Association*

Project consultants

Christopher Wallgren and Samuel Korach, *Transportation Resource Associates Inc.*

Introduction

This introduction is not part of APTA RTA-OP-S-018-12 Rev 1 *Fitness for Duty Program Requirements*.

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 that rail transit is not directly comparable to railroads (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.

APTA recommends the use of this standard 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).

Note on alternate practices

Individual rail transit systems (RTAs) may modify the practices in this standard to accommodate their specific equipment and mode of operation. APTA recognizes that some RTAs may have unique operating environments that make strict compliance with every provision of this standard impractical. As a result, certain RTAs may need to implement alternatives to these standards and practices. An RTA 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 RTA'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).

Fitness for Duty (FFD) Program Requirements

1. Creation of FFD Program

The RTA shall develop a FFD program that applies to any employee that operates or has the potential to operate a train in revenue service. This includes train operators at all RTAs, and it may include operations supervisors and/or train controllers.

The RTA shall consider if other safety-sensitive positions, such as on-track equipment personnel and wayside workers, shall be incorporated into this FFD program or a separate program. In this standard, the term “covered employee(s)” is used to refer to any employee identified by the RTA in its FFD Program.

The RTA shall develop an FFD program that incorporates employee compliance requirements and the information contained in this Standard. This shall include, at a minimum:

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

The RTA shall consider Federal Motor Carriers Safety Administration (FMCSA) Regulation 49 CFR 391 which provides a framework for FFD program requirements. The RTA shall consider evaluating the requirements of the CDL and DOT Card in developing the minimum physical and medical requirements.

1.1 Requirements – Physical

The RTA shall identify minimum physical requirements related to the job responsibilities of the covered employees. See Appendix A for examples of physical requirements.

1.2 Requirements – Medical

The RTA shall identify minimum medical requirements related to the job responsibilities of the covered employee.

2. Pre-Selection Requirements

The RTA shall establish a process that identifies potential covered employees that meet the baseline FFD requirements.

The RTA shall address requirements for candidates moving into a covered employee position. This may include, but not be limited to the following examples:

- Ability to perform activities associated with train operation
- Ability to board and alight train in all types of trackways and all-weather conditions;
- Ability to walk in all types of trackways and all-weather conditions;
- Ability to see, distinguish and interpret signals both car-borne and wayside signals;
- Ability to operate wayside equipment, such as switches, emergency exits, etc.
- Ability to perform the activities associated with implementing a train evacuation.

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

In establishing pre-selection requirements, the RTA shall evaluate and consider implementing established standards that tie medical terminology to the physical and medical requirements of the job, such as is done in other physically demanding positions.

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

2.1 Pre-Selection Qualifications – Physical

The RTA 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 RTA FFD Program.

The RTA shall develop an FFD Program requiring compliance with the essential functions of the position as a prerequisite for an employee being hired or transferred into a position covered by the RTA FFD Program.

2.2 Pre-Selection Qualifications – Medical

The RTA 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 RTA FFD Program.

2.3 Pre-Selection Assessment

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

3. Assessment of Trainees' FFD During Training

The RTA shall identify a process in its FFD program for the ongoing assessment of employee compliance with minimum physical and medical requirements.

4. On-the-Job Requirements

The RTA shall establish an FFD Program that contains the baseline on-duty FFD requirements for all covered employees.

4.1 Routine FFD Medical Examinations

At a minimum, the RTA's FFD Program shall require that all covered employees undergo regular medical examinations to ensure that their general physical health makes them fit for duty. The RTA shall establish standards for initial medical certification and recertification.

4.2 Regular FFD Checks

The RTA shall establish a Program that describes the process for ensuring that covered employees are assessed for FFD prior to and/or during their shift on a regular basis.

The RTA'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).

4.3 Employees Responsibilities for Reporting Events That May Have Been Caused by FFD Condition

The RTA'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.

4.4 Employee Self-Reporting Requirements

The RTA 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 RTA monitoring of employees who self-report issues

4.5 Triggering Events that Require Additional FFD Assessments

The RTA shall develop a policy that states which types of events may cause the RTA 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.

5. Program Administrative Requirements

5.1 Identification of FFD-Applicable Positions

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

5.2 Designation of FFD Administration and Oversight

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

5.3 Supervisor and Management Responsibilities

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

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

5.4 Reverification of FFD

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

5.5 Reinstatement of Duties / Return to Work

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

5.6 Follow-Up Actions

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

5.7 Documentation

The RTA shall determine what documentation is required for the FFD Program.

6. Training and Awareness

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

The RTA shall develop training and or awareness materials to familiarize operators with the subject of FFD and with RTA FFD Program requirements.

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

7. Program Management and Update

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

Related APTA standards

APTA RT-OP-S-013-03 Rev 1 *Standard for Train Operating Employees Reporting to Work*
APTA RT-OP-S-015-09 *Standard for Train Operator Hours of Service Requirements*
APTA RT-OP-S-019-014 *Rail Transit Operations Supervisor Program Requirements*
APTA RT-OP-S-023-17 *Fatigue Management Program Requirements*

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 RTA to determine and utilize titles as it finds appropriate.

Train operator: The onboard employee who controls the movement of a train

on-track equipment: A rail mounted vehicle or equipment, including hi-rail vehicles and equipment that is not used for revenue service but is used to inspect, maintain, and repair the rail system.

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

rail transit system (RTA): 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.

Abbreviations and acronyms

APTA	American Public Transportation Association
FFD	fitness for duty
FMCSA	Federal Motor Carriers Safety Association
NATSA	North American Transit Services Association
OTE	on-track equipment
RTA	rail transit agency
SSPP	system safety program plan

Summary of changes

- Section 1: Two new paragraphs added.
- Section 2: Three new bullets added to the list of abilities required of employees.
- Section 3: This is a new section titled *Assessment of Trainees' FFD During Training*.
- Sections 4-7: Renumbered due to addition of a new section 3.

Document history

Document Version	Working Group Vote	Public Comment/ Technical Oversight	Rail Transit CEO Approval	Rail Transit Standards Policy & Planning Approval	Publish Date
First published	September 2012	4Q 2012	4Q 2012	4Q 2012	January 2013
First Revision	June 29, 2018	September 1, 2018	October 8, 2018	November 21, 2018	January 4, 2019

Annex A – Additional Operator Physical Qualifications to Consider for FFD Program

All RTAs have a variety of different unique operating conditions that may have specific requirements. The RTA 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 RTA. The following list is not intended to be a comprehensive list, and it is not intended to be a list that applies to all RTAs. 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