

Rail Transit Roadway Worker Protection Program Checklist

The Federal Transit Administration (FTA) is providing this Roadway Worker Protection (RWP) program checklist to assist Rail Transit Agencies (RTAs) with developing their RWP manuals in accordance with [49 CFR part 671](#). State Safety Oversight Agencies (SSOAs) that must review and approve the RWP programs may also choose to use this checklist.

☒	Checklist Item	Page Number	Comments
☐	Use of this checklist is voluntary.	Indicate page where content found in manual.	Add comments to note how requirements are addressed, indicate missing requirements, or suggest possible additional elements/best practices.
 The yellow rows in the table include additional information an agency may consider when developing that section of the RWP program.			

This guidance document is not legally binding in its own right, and the Federal Transit Administration will not rely upon it as a separate basis for affirmative enforcement actions or other administrative penalty. Conformity with this document (as distinct from existing statutes and regulations) is voluntary only, and nonconformity will not affect rights and obligations under existing statutes and regulations.

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RWP Manual Contents

Part 671 clarifies that the RWP manual is the single authoritative document that houses all roadway worker protection information and procedures, including all on-track safety protection and on-track safety measures designed to prevent roadway workers from being struck by rail transit vehicles or other on-track equipment.

Maintaining one comprehensive manual ensures consistency, accountability, and more effective annual reviews while facilitating oversight by both SSOAs and FTA. An RTA can, however, reference existing rulebooks or incorporate them into its RWP manual.

The RWP manual must document processes and procedures for all transit workers accessing the track, including roadway workers, other transit workers, and safety oversight personnel. Key required contents include RWP training and qualification requirements by labor category, procedures for track access and redundant protections, and incorporation of a track access guide identifying high-risk locations. FTA allows flexibility in distribution format (electronic or physical) but requires that all transit workers who access the roadway receive the manual and have easy access to up-to-date versions.

The manual must be reviewed at least every two years and updated as needed when system changes occur, with all updates requiring SSOA approval.

The RWP manual includes:

☒	Checklist Item	Page Number	Comments
☐	§ 671.13(b) The terminology, abbreviations, and acronyms used to describe the RWP program activities and requirements.		
	 <i>The terminology, abbreviations, and acronyms included in the RWP manual may be differentiated by mode or combined into one section of the RWP manual.</i>		

☒	Checklist Item	Page Number	Comments
☐	§ 671.13(c)(1) The following RWP program elements as outlined in the RWP Program Elements section of this checklist: • Roadway worker in charge requirements • Job safety briefing policies • Lone worker authorization and communication • Good faith safety challenge • Risk-based redundant protection requirements • RWP training and qualification program • RWP compliance monitoring program		
☐	§ 671.13(c)(2) A definition of RTA responsibilities as outlined in the RTA General Responsibilities and RTA Responsibilities for Establishing On-Track Safety Requirements sections of this checklist.		
☐	§ 671.13(c)(2) A definition of transit worker responsibilities as outlined in the Transit Worker Responsibilities section of this checklist.		
☐	§ 671.13(c)(3) Documentation of the training, qualification, and supervision required for transit workers to access the track zone, by labor category or type of work performed as outlined in the RWP Training and Qualification Program section of this checklist.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.13(c)(4) The processes and procedures for all transit workers who may access the track zone in the performance of their work.		
	 <i>These procedures could include an operator entering the roadway to troubleshoot a train, or a customer service representative accessing the right-of-way to retrieve a personal item.</i>		
☐	§ 671.13(c)(4) Procedures for SSOA personnel to access the roadway that conform with the SSOA's risk-based inspection program.		
☐	§ 671.13(d) A track access guide to support on-track safety, as outlined in the Track Access Guide section of this checklist (this can be incorporated by reference).		
☐	§§ 671.13(e–g) A process for reviewing, approving, and distributing the RWP manual, as outlined in Manual Review, Updates, and Distribution section of this checklist.		
	 <i>The agency may distribute the manual electronically or physically, as long as workers have easy access to the current version. Workers are not required to carry the manual with them.</i>		

RWP Program Elements

Roadway Worker in Charge Requirements

The roadway worker in charge is responsible for providing on-track safety for all members of the roadway work group and must focus on maintaining on-track safety without performing other unrelated job functions. Part 671 intentionally limits roadway worker in charge activities to ensure the position is focused on maintaining on-track safety for all members of the roadway work group.

The roadway worker in charge is not allowed to perform work that is part of the scope of the work crew that goes beyond maintaining on-track safety.

For scenarios involving multiple work groups within common working limits, there may be a single roadway worker in charge for the entire working limit, but each work group must be accompanied by an employee qualified to the level of a roadway worker in charge who maintains direct communication with the roadway worker in charge.

On-Track Safety and Supervision

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	§ 671.31(a) The RTA designates one roadway worker in charge for each roadway work group whose duties require fouling a track.		
☐	§ 671.31(a)(1) The roadway worker in charge is qualified under the RTA's training and qualification program.		
☐	§ 671.31(a)(2) The RTA designates the roadway worker in charge either generally or specifically for a particular work situation.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.31(a)(3) The roadway worker in charge is responsible for the on-track safety of all members of the roadway work group.		
☐	§ 671.31(a)(4) The roadway worker in charge serves only the function of maintaining on-track safety for all members of the roadway work group and performs no other unrelated job function while designated for duty.		
	 <i>Examples of activities that fall under the function of maintaining on-track safety include flagging, work-zone setup, and administrative tasks.</i>		
☐	§ 671.31(a)(5) For multiple roadway work groups within common working limits, if the RTA designates a single roadway worker in charge of the entire working limit, each work group is accompanied by an employee qualified to the level of a roadway worker in charge who shall be responsible for direct communication with the roadway worker in charge.		

Communication

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	§§ 671.31(b) and 671.33(a) The RTA ensures that the roadway worker in charge provides a job safety briefing to all roadway workers before any member of a roadway work group fouls a track, every time a roadway worker fouls the track.		
	 <i>For street-running systems, job safety briefings can address the fact that transit workers may be fouling the track continually throughout the course of a working shift, and the job safety briefings may be provided accordingly.</i>		
☐	§ 671.31(b)(1) Work in the track zone may not continue until the roadway worker in charge provides a job safety briefing to all members of the roadway work group: • Before any on-track safety procedures change during the work period, • Whenever on-track safety conditions change, • Or immediately following an observed violation of on-track safety procedures.		
	 <i>After a violation of on-track safety, a full recitation of the original safety briefing is not required; the briefing only needs to address the violation to ensure all are aware of the correct procedures.</i>		
☐	§ 671.31(b)(2) In the event of an emergency, the roadway worker in charge warns each roadway worker to immediately leave the roadway and not return until on-track safety is reestablished, and a job safety briefing is completed.		

Job Safety Briefing Policies

RTAs must conduct job safety briefings before any worker fouls the track. The roadway worker in charge must brief workers on elements including work scope, safety procedures, communication roles, and designated places of safety that can accommodate all workers present. When multiple work groups operate in adjacent areas, their respective leaders must coordinate briefings. Workers must provide written acknowledgment of understanding the briefing, which the worker in charge must verify in writing. Additional briefings are required if work scope changes, safety conditions shift, or safety violations occur.

In-person job safety briefings are the most effective way to ensure clear communication of key information to keep workers safe. However, the RTA has the discretion to determine when remote job safety briefings may be necessary and to establish practices that suit their track environment and roadway work practices so long as they comply with this requirement.

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
§ 671.33(b) Job safety briefings include the following, at a minimum and as appropriate:			
☐	§ 671.33(b)(1) A discussion of the nature of the work to be performed and the characteristics of the work, including work plans for multiple roadway worker groups within a single work area.		
☐	§ 671.33(b)(2) Working limits.		
☐	§ 671.33(b)(3) The hazards involved in performing the work. (For RTAs with electrified systems, this discussion must include the status of power and hazards explicitly related to the electrified system.)		

☒	Checklist Item	Page Number	Comments
	<i>Industry best practices for job safety briefings include:</i>  • <i>Site-specific hazards and day-to-day conditions, including current weather and environmental conditions, related to the work to be performed and</i> • <i>The protections to eliminate or protect against those hazards.</i>		
☐	§ 671.33(b)(4) Information on how the agency will provide on-track safety for each track that will be fouled.		
☐	§ 671.33(b)(4) The identity and location of key personnel, such as a watchperson and the roadway worker in charge.		
☐	§ 671.33(b)(4) Information on what will be done in the event of an on-track emergency.		
☐	§ 671.33(b)(5) Instructions for each on-track safety procedure to be followed, including appropriate flags and proper flag placement.		
☐	§ 671.33(b)(6) The roles and responsibilities for communication among all transit workers involved in the work.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.33(b)(7) Safety information about any adjacent track, defined as track next to or adjoining the track zone where on-track safety has been established.		
☐	§ 671.33(b)(7) The identification of roadway maintenance machines or on-track equipment that will foul adjacent tracks.		
☐	§ 671.33(b)(8) Information on the accessibility of the roadway worker in charge, including emergency contact information and alternative procedures in the event the roadway worker in charge is no longer accessible to members of the roadway work group.		
☐	§ 671.33(b)(9) Required personal protective equipment.		
☐	§ 671.33(b)(10) Designated place(s) of safety of a sufficient size to accommodate all roadway workers within the work area.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.33(b)(11) The means for determining ample time.		<i>This calculation will vary based on an RTA's unique operating characteristics and the highest or maximum speed permitted on the system, wherever and however it may be specified.</i>  <i>Fifteen seconds is the baseline required time for workers to be clear of the track zone or in a place of safety. RTAs may wish to prescribe additional or more stringent time requirements consistent with the regulation.</i>
☐	§§ 671.33(c)(1–3) A job safety briefing is complete only after: • The roadway worker in charge confirms that each roadway worker understands the on-track safety procedures and instructions; • Each roadway worker acknowledges in writing the briefing and the requirement to use the required personal protective equipment; and • The roadway worker in charge confirms in writing that they have received a written acknowledgment of the briefing from each worker.		 <i>Written acknowledgement may be in the form of a formal signature or another method of written affirmation that best suits an RTA's purposes, including having the written acknowledgement be a secondary document (for example, an attendance roster or a job briefing acknowledgement form with each roadway worker's signature) as long as it complies with Part 671 recordkeeping requirements.</i>

☑	Checklist Item	Page Number	Comments
☐	§ 671.33(d) A follow-up job safety briefing is conducted after the initial job safety briefing if: • There is any change in the scope of work or roadway work group, • On-track safety conditions change, or a violation of on-track safety is observed.		
	 <i>Changes in on-track safety protections and weather conditions may present new hazards and, therefore, require a follow-up briefing. Consider the following suggestions from Safety Advisory 14-1:</i> • Track allocation changes • Change in train frequency or occupancy • Change of work equipment or equipment failure • Addition or reduction of work staff • Change of roadway worker in charge • Change in work scope • Weather changes <i>It will be up to each RTA to determine, clearly communicate, and respond to violations of on-track safety. In general, FTA recommends that RTAs consider any deviations from the procedures set forth in the RWP manual or the job safety briefings to be violations of on-track safety.</i>		

Lone Worker Authorization and Communication

Lone workers are a subclassification of roadway workers. A train operator who momentarily must leave their vehicle to remove debris is a transit worker, not a roadway worker or a lone worker, because a train operator's duties do not involve inspection, construction, maintenance, repairs, or providing on-track safety.

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	§ 671.35(a) The RTA authorizes lone workers to perform limited duties that require fouling a track.		
☐	§ 671.35(a)(1) The lone worker must be qualified as a roadway worker in charge and lone worker under the RTA's training and qualification program.		
	 <i>Being qualified as a roadway worker in charge does not mean the lone worker is acting as a roadway worker in charge because there is no roadway work group to oversee. This qualification is necessary to ensure a lone worker has the requisite expertise and possesses a comprehensive understanding of on-track safety procedures and responsibilities, equivalent to that of a roadway worker in charge, to foul the track alone.</i>		
☐	§ 671.35(a)(2) The lone worker is only allowed to perform routine inspections or minor tasks and may move from one location to another. The lone worker cannot use power tools and can only access locations defined for lone workers in the track access guide.		
	 <i>Specific tasks that qualify as minor tasks will depend on the situation and the RTA's RWP program but may include activities such as measurements, taking pictures, observing train movements, establishing on-track safety, and emergency response.</i>		
☐	§ 671.35(a)(3) The lone worker cannot use individual rail transit vehicle detection as the only form of on-track safety.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.35(b) Before fouling the track, each lone worker must communicate with a supervisor or another designated employee to receive an on-track safety job briefing as described in this manual, which includes a discussion of their planned work activities and the procedures they intend to use to establish on-track safety.		
	 <i>Job safety briefings can be proportional to the task's complexity and duration; a job safety briefing for momentary track fouling may be different from one for longer work. Additionally, job safety briefings for lone workers may be provided from the Control Center over the radio as long as communication is directly with the lone worker and meets the job safety briefing requirements of Part 671.</i>		
☐	§ 671.35(b) The lone worker must acknowledge and document the job safety briefing in writing.		
	 <i>This may be logistically challenging in some cases, so RTAs can determine how they will document the written acknowledgement, such as with forms, notebooks, logs, or other tools. The acknowledgment's purpose is to ensure that the worker has thoroughly considered all safety aspects of their task before accessing the track.</i>		

Good Faith Safety Challenge

The right to refusal is integral to the good faith safety challenge to prioritize worker safety, promptly resolve hazards, and emphasize the preeminence of safety in a rail transit environment. RTAs can address safely stopping work within their good faith safety challenge procedures. An RTA's size, staffing, and system type may impact how it approaches the good faith safety challenge process.

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	§ 671.37(a) Procedures that provide every roadway worker the right to challenge and refuse in good faith any assignment they believe is unsafe or would violate the RTA's RWP program.		
	 <i>FTA recommends that RTAs encourage all workers, including lone workers, to assess their work environment before and during their tasks to empower transit workers to initiate a good faith safety challenge when necessary, including when work conditions change due to various factors that may not be reflected in either the track access guide or the initial job safety briefing.</i>		
☐	§ 671.37(b) These procedures include methods or processes to achieve prompt and equitable resolution of any challenges and refusals.		
☐	§ 671.37(c) These procedures require that: • The roadway worker describes the on-track safety concern, and • The roadway work group remains clear of the roadway or track zone until the challenge and refusal are resolved.		

Risk-Based Redundant Protection Requirements

Safety Risk Assessments

RTAs will determine the protections that best fit their needs by assessing safety risk and establishing mitigations in the form of redundant protections for each category of work performed by transit workers on the rail transit system.

The regulation does not require a separate safety risk assessment document so long as the risk assessment identifies the specific safety risk mitigations or strategies necessary to address RWP risks and otherwise complies with Part 671 requirements. RTAs may use existing RWP programs and safety risk assessments as long as they meet all the requirements of Part 671.

The joint labor-management Safety Committee, as part of its statutory responsibilities, may identify RWP-related safety deficiencies and recommend risk-based mitigations to address RWP hazards identified in the agency's safety risk assessment.

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	<u>§ 671.39(b) and (b)(1)</u> The RTA assesses the risk associated with transit workers accessing the roadway and establishes redundant protections for each category of work performed by roadway workers, including lone workers, using the Safety Risk Management (SRM) process established in its Agency Safety Plan (ASP), which is consistent with the SSOA's program standard.		
	 <i>Tasks demanding more attention from roadway workers, including the use of tools and equipment, may require RTAs to implement greater levels of protection based on the results of the safety risk assessment.</i>		

☒	Checklist Item	Page Number	Comments
☐	§ 671.39(b)(2) Whether the safety risk assessment is supplemented by engineering assessments, inputs from the Safety Assurance process established in the ASP, the results of safety event investigations, and other SRM strategies or approaches.		
☐	§ 671.39(b)(3) The RTA reviews and updates the safety risk assessment at least every two years to include current conditions and lessons learned from safety events, actions taken to address reports of unsafe acts and conditions and near-misses, and results from monitoring the effectiveness of the redundant protections.		
	 <i>Safety information can change greatly in a two-year span. As an industry best practice, RTAs may reassess this information more frequently to ensure they are not relying on outdated information.</i>		

Work Categories Requiring Redundant Protection

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	§ 671.39(a), § 671.39(a)(2), and § 671.39(c) The RTA provides redundant protections: - For roadway workers performing different categories of work on the roadway and within track zones, and - To ensure on-track safety for multiple roadway work groups within a common work area. These categories include:		

☒	Checklist Item	Page Number	Comments
	 <i>Applicable labor categories and types of work performed can be defined in several ways and will vary by agency due to the diverse operating characteristics of RTAs.</i>		
☐	§ 671.39(c)(1) Roadway workers moving from one track zone location to another;		
☐	§ 671.39(c)(2) Roadway workers performing minor tasks;		
☐	§ 671.39(c)(3) Roadway workers conducting visual inspections;		
☐	§ 671.39(c)(4) Roadway workers using hand tools, machines, or equipment in conducting testing of track system components or non-visual inspections;		
☐	§ 671.39(c)(5) Roadway workers using hand tools, machines, or equipment in performing maintenance, construction, or repairs; and/or		
☐	§ 671.39(c)(6) Lone workers accessing the roadway or track zone or performing visual inspections or minor tasks.		
☐	Other work categories the RTA has, if any.		

Types of Redundant Protections

Redundant protections may be procedural or physical. ([§§ 671.39\(d\)\(1\)](#), [\(d\)\(1\)\(i\)](#), and [\(d\)\(1\)\(ii\)](#))

- Procedural protections alert rail transit vehicle operators to the presence of roadway workers and use radio communications, personnel, signage, or other means to direct rail transit vehicle movement.
- Physical protections physically control the movement of rail transit vehicles into or through a work zone.

RTAs must use a safety risk assessment to identify protections that are proportional to the RTA's determined risk, **which will not be the same across agencies**. However, there must always be at least two protections. Beyond that, the number of protections will depend on the work environment and the results of the RTA's safety risk assessment.

The redundant protections listed below serve only as common examples and are a non-exhaustive list not meant to be limiting. FTA recommends that RTAs design programs with effective redundant protections that work for their operations and environments.

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	Redundant protections included in the manual. Per § 671.39(d), redundant protections may include the following: • Approaches consistent with the FRA rules governing redundant protections; § 671.39(d)(2)(i) • Rail transit vehicle approach warning. § 671.39(d)(2)(ii) • Foul time. § 671.39(d)(2)(iii) • Exclusive track occupancy, defined as a method of establishing working limits, as part of on-track safety, in which movement authority of rail transit vehicles and other equipment is withheld by the control center or restricted by flag persons and		[List each redundant protection.]

☒	Checklist Item	Page Number	Comments
	provided by a roadway worker in charge. § 671.39(d)(2)(iv) - Warning signs, flags, or lights. § 671.39(d)(2)(v) - Flag persons. § 671.39(d)(2)(vi) - Lock outs from the rail transit vehicle control systems or lining and locking track switches or otherwise physically preventing entry and movement of rail transit vehicles § 671.39(d)(2)(vii) - Secondary warning devices and alert systems. § 671.39(d)(2)(viii) - Shunt devices and portable trip stops to reduce the likelihood of rail transit vehicles from entering work zone with workers. § 671.39(d)(2)(ix) - Restricting work to times when propulsion power is down with verification that track is out of service, and when barriers are placed that physically prevent rail transit vehicles, including on-track equipment, from entering the work zone. § 671.39(d)(2)(x) - Use of walkways in tunnels and on elevated structures to reduce roadway worker time in the track zone. § 671.39(d)(2)(xi) - Speed restrictions. § 671.39(d)(2)(xii) - For lone workers, at a minimum, foul time or an equivalent protection is approved by the SSOA. § 671.39(d)(3) - Any alternate redundant protections identified and required by the SSOA		

☒	Checklist Item	Page Number	Comments
	based on the RTA's unique operating characteristics and capabilities § 671.39(b)(4)		
	 <i>If and when an SSOA requires an RTA to implement alternate redundant protections, FTA recommends that both agencies work together to identify appropriate solutions.</i>		

RWP Training and Qualification Program

RWP Training Program Requirements and Elements

Each RTA must adopt an RWP training program, which, at a minimum, must address the requirements of [§ 671.41](#).

RTAs can adapt training to their operating environments and the nuances of their specific operations while meeting the minimum RWP requirements.

The RWP manual specifies that the RWP training program:

☒	Checklist Item	Page Number	Comments
☐	§ 671.41(a)(1) Addresses all transit workers responsible for on-track safety by position, including: • Roadway workers, • Operations control center personnel, • Rail transit vehicle operators, • Operators of on-track equipment and roadway maintenance machines, and • Any others with a role in providing on-track safety or fouling a track for the performance of work.		

☒	Checklist Item	Page Number	Comments
☐	<u>§ 671.41(a)(2)</u> Must be completed by the relevant positions before an RTA may assign a transit worker: • To perform the duties of a roadway worker, • To oversee or supervise access to the track zone from the operations control center, or • To operate vehicles, on-track equipment, and roadway maintenance machines on the rail transit system.		
☐	<u>§ 671.41(a)(3)</u> Addresses RWP hazard recognition and mitigation and lessons learned through: • The results of compliance testing, • Near-miss reports and reports of unsafe acts or conditions, and • Feedback received on the training program.		
☐	<u>§ 671.41(a)(4)</u> Includes initial and refresher training, by position, and refresher training occurs at least every two years.		
☐	<u>§ 671.41(a)(5)</u> Is reviewed and updated by the RTA, with assistance from roadway workers, at least once every two years to reflect lessons learned in implementing the RWP program and information provided by the SSOA and FTA.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.41(b) Includes interactive training with the opportunity to ask the trainer questions and raise and discuss RWP issues.		
☐	§ 671.41(b)(1) Includes experience in a representative field setting for all initial training.		
	 <i>An agency could use simulations or controlled environments to approximate field conditions.</i>		
☐	§ 671.41(b)(2) Includes demonstrations and assessments for both initial and refresher training to ensure transit workers performing or responsible for on-track safety and RWP functions have the ability to comply with RWP instructions.		

RWP Training Program Contents

The RWP training program must address the following minimum contents if applicable to the RTA ([§ 671.41\(c\)](#)). If certain elements are not applicable to an agency's operations, they may omit those specific items after documenting the rationale in their training program.

The RWP manual specifies that the RWP training program contents include:

☒	Checklist Item	Page Number	Comments
☐	§ 671.41(c)(1) How to interpret and use the RTA's RWP manual.		
☐	§ 671.41(c)(2) How to challenge and refuse assignments in good faith.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.41(c)(3) How to report unsafe acts, unsafe conditions, and near-misses after they occur and the mandatory duty to make such reports.		
	 <i>Common methods for reporting and tracking safety concerns include safety hotlines, hardcopy paper reports, or other channels. For more options, see the Employee Safety Reporting Program: Methods and Implementation document here: https://www.transit.dot.gov/regulations-and-programs/safety/public-transportation-agency-safety-program/employee-safety-0.</i>		
☐	§ 671.41(c)(4) How to recognize the track zone and understand the space around tracks within which on-track safety is required.		
☐	§ 671.41(c)(4) How to use the track access guide.		
☐	§ 671.41(c)(5) The functions and responsibilities of all transit workers involved in on-track safety, by position.		
☐	§ 671.41(c)(6) How to properly comply with on-track safety instructions given by transit workers performing or responsible for on-track safety functions.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.41(c)(7) The signals and directions given by watchpersons and the proper procedures upon receiving a rail transit vehicle approach warning from a watchperson.		
☐	§ 671.41(c)(8) The hazards associated with working on or near rail transit tracks (<i>include traction power, if applicable</i>).		
☐	§ 671.41(c)(9) The rules and procedures for redundant protections identified by the RTA and how they are applied to RWP.		
☐	§ 671.41(c)(10) The requirements for safely crossing rail transit tracks in yards and on the mainline.		

Specialized Training and Qualification

The RWP training program must include additional training for watchpersons, flag persons, lone workers, roadway workers in charge, and other transit workers with responsibilities for establishing, supervising, and monitoring on-track safety. ([§ 671.41\(d\)](#))

The RWP manual specifies that the RWP training program:

☒	Checklist Item	Page Number	Comments
☐	§ 671.41(d)(1) Covers the content and application of the additional RWP program requirements carried out by watchpersons, flag persons, lone workers, roadway workers in charge, and other transit workers responsible for establishing, supervising, and monitoring on-track safety.		
	 <i>This rule allows the use of on-the-job training or shadowing as part of a comprehensive RWP training program, provided it meets the requirements outlined in the regulation.</i>		
☐	§ 671.41(d)(1) Addresses the relevant physical characteristics of the RTA's system where on-track safety may be established.		
	 <i>An industry best practice is for RTAs to tailor their training programs to address the nuances of their specific operations while meeting the minimum requirements set forth in the regulation.</i>		
☐	§ 671.41(d)(2) Includes demonstrations and assessments to confirm transit workers' ability to perform their additional responsibilities.		



☒	Checklist Item	Page Number	Comments
☐	§ 671.41(d)(3) Includes refresher training on additional on-track safety responsibilities, by position, at least every two years.		

Training Personnel Competency and Qualification

RTAs may reference FRA's "designated instructor" definition when developing their own criteria for selecting RWP trainers, as long as the selected trainer also meets the following RWP qualification and experience requirements.

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	§ 671.41(e) The RTA ensures that the trainers providing RWP training are qualified and have active RWP certification at the RTA to provide effective RWP training. To ensure trainer qualifications, the RTA considers:		
☐	§ 671.41(e)(1) Their experience and knowledge of effective training techniques in the chosen learning environment.		
☐	§ 671.41(e)(2) Their experience with the RTA's RWP program.		
☐	§ 671.41(e)(3) Their knowledge of the RTA's RWP rules, operations, operating environment, and applicable operating rules.		
☐	§ 671.41(e)(4) Their knowledge of the training requirements specified in the RTA's RWP training program.		

RWP Compliance Monitoring Program

The RWP manual must include a program for monitoring compliance with the requirements specified in the RTA's RWP program. ([§ 671.43\(a\)](#))

Part 671 specifies that:

☒	Checklist Item	Page Number	Comments
☐	§ 671.43(b) The RWP compliance monitoring program must include inspections, observations, and audits consistent with: • The safety performance monitoring and measurement processes described in the Safety Assurance component of the RTA's ASP, and • The SSOA's program standard.		
	 <i>RTAs already have an established a process to assess safety performance per § 673.27(d). They may use similar practices to audit their RWP program, including how the audit is performed and the selection of the auditor performing the audit.</i> <i>RTAs may use inspections, observations, and audits individually or together in their monitoring programs.</i>		
☐	§ 671.43(b)(1) The RTA must develop quarterly reports for the SSOA that document the RTA's compliance with and sufficiency of its RWP program.		
	 <i>RTAs may consider including the following: RWP safety events; compliance monitoring results and findings; monthly performance measures and targets; related CAPs; program or manual updates; good faith safety challenges issued; and RWP initial and refresher training conducted.</i>		

☒	Checklist Item	Page Number	Comments
☐	§ 671.43(b)(2) The RTA must present an annual briefing to the Accountable Executive and the Board of Directors, or equivalent entity, about the RWP program's performance and any identified deficiencies requiring corrective action.		
	 <i>RTAs may opt to provide more frequent briefings for Boards of Directors or equivalent entities to ensure that they are continually informed about the high levels of safety risk that workers are exposed to, the effectiveness of the practices in place to protect them, and any concerning trends that may require mitigation and/or dedicated resources to make safety improvements.</i>		

Responsibilities

RTA General Responsibilities

The RWP manual specifies that the RTA has established procedures for the following:

☒	Checklist Item	Page Number	Comments
☐	§ 671.21(a)(1) Providing ample time and determining the appropriate sight distance based on maximum authorized track speeds.		
☐	§ 671.21(a)(2) Ensuring that individual rail transit vehicle detection is never used as the only form of protection in the track zone.		
☐	§§ 671.21(a)(3) and (a)(4) Providing job safety briefings to all transit workers: - Who must enter a track zone to perform work, and - Whenever a rule violation is observed.		
	 <i>RTAs may establish practices for remote job safety briefings, depending on the circumstances of their track environment and roadway work practices. The manual may specify when and how virtual job safety briefings are allowed.</i>		
☐	§ 671.21(a)(5) Providing transit workers with the right to challenge and refuse in good faith any assignment based on on-track safety concerns. Resolving such challenges and refusals promptly and equitably.		

☒	Checklist Item	Page Number	Comments
	 Many RTAs already implement a process for resolving good faith safety challenges. The final rule does not require RTAs to revise their existing procedure and process, as long as they meet the minimums specified in the rule.		
☐	§ 671.21(a)(6) Requiring the reporting of unsafe acts, unsafe conditions, and near-misses on the roadway per the RTA's Transit Worker Safety Reporting Program described in its ASP.		
	 Established under part 673, the Transit Worker Safety Reporting Program applies to all workers and includes transit worker safety reports related to work performed on the roadway. Part 671 emphasizes the importance of the safety reporting program in capturing safety-critical information related to RWP.		
☐	§ 671.21(a)(7) Ensuring all transit workers who must enter a track zone to perform work understand, are qualified in, and comply with the RWP program.		
☐	§ 671.21(a)(8) Providing an escort for individuals that must enter a track zone and who are not RWP certified and do not fall into the categories of roadway worker, transit worker, or emergency personnel.		

RTA Responsibilities for Establishing On-Track Safety Requirements

The RWP manual specifies that the RTA has established requirements for on-track safety that include:

☒	Checklist Item	Page Number	Comments
☐	§ 671.21(b)(1) The equipment, by labor category, that transit workers must use to access the roadway or a track zone, including personal protective equipment such as high-reflection vests, safety shoes, and hard hats.		
	 <i>Labor categories and types of work performed can be defined in several ways and will vary by agency due to the diverse operating characteristics of each RTA.</i> <i>Agencies may consider religious articles that transit workers might wear when developing personal protective equipment policies.</i>		
☐	§ 671.21(b)(2) The credentials, by labor category, for transit workers to enter the roadway or track zone and how to display them so they are visible.		
	 <i>Displaying credentials clarifies workers' roles and ensures they are following the appropriate protocols for those roles. RTAs may determine the content and the form of the credentials.</i>		
☐	§ 671.21(b)(3) Protections for emergency response personnel who must access the roadway or the track zone.		

☒	Checklist Item	Page Number	Comments
☐	§ 671.21(b)(4) Protections for multiple roadway work groups within a common work area in a track zone.		

Transit Worker Responsibilities

The RWP manual specifies the following transit worker responsibilities:

☒	Checklist Item	Page Number	Comments
☐	§ 671.23(a) Each transit worker must follow the requirements of the RTA's RWP program by position and labor category.		
☐	§ 671.23(b) Transit workers may only foul the track after: • They receive appropriate permissions and • Redundant protections have been established as specified in the RWP manual.		
☐	§ 671.23(c) Before accessing the roadway or track zone, transit workers must acknowledge in writing that they understand the protections providing on-track safety measures for their specific task.		
	 <i>RTAs have flexibility to determine the method of written acknowledgement, which could include forms, notebooks, or logs, or signing the bottom of a job safety briefing.</i>		

☒	Checklist Item	Page Number	Comments
☐	§ 671.23(d) Transit workers may refuse to foul the track if they make a good faith determination that they believe an assignment is unsafe or would violate the RTA's RWP program.		
	 <i>Frontline workers, who are often in the best position to recognize and understand the potential risks of an assignment, have the authority to raise their safety concerns. Industry best practice is for all workers, including lone workers to assess their work environment before and during their tasks and be able to initiate a good faith safety challenge when they deem it necessary.</i>		
☐	§ 671.23(e) Transit workers must report unsafe acts and conditions and near-misses related to the RWP program as defined in the RTA's Transit Worker Safety Reporting Program.		

Track Access Guide

The rule requires the RWP manual to include or incorporate by reference a track access guide to support on-track safety. ([§ 671.13\(d\)](#)). A track access guide is a document that describes the physical characteristics of the RTA's track system, including track areas with close or no clearance, curves with blind spots or restricted sight lines, areas with loud noise, and potential environmental conditions that require additional consideration in establishing on-track safety. ([§ 671.5](#))

The track access guide is meant to inform workers of areas of heightened risk and better allow for RTAs and workers to control for potential hazards. RTAs may opt to include additional environmental hazards in their track access guides, as needed.

The track access guide is based on a physical survey of the track geometry and condition of the transit system and includes, at a minimum ([§ 671.13\(d\)](#)):

☒	Checklist Item	Page Number	Comments
☐	§ 671.13(d)(1) Locations with limited, close, or no clearance, including locations (such as alcoves, recessed spaces, or other designated places or areas of refuge or safety) with size or access limitations.		
☐	§ 671.13(d)(2) Locations subject to increased rail vehicle or on-track equipment braking requirements or reduced rail transit vehicle operator visibility due to precipitation or other weather conditions.		
 <i>Weather conditions are variable, and the final rule requires the track access guide to document locations of high risk that certain weather conditions may cause. For example, an RTA may be aware of track switches that frequently become covered by snow, which would affect the ability of a transit worker to see the switches, or of areas that are regularly covered by fog.</i>			

☒	Checklist Item	Page Number	Comments
☐	<u>§ 671.13(d)(3)</u> Curves with no or limited visibility.		
☐	<u>§ 671.13(d)(4)</u> Locations with limited or no visibility due to obstructions or topography.		
☐	<u>§ 671.13(d)(5)</u> All portals with restricted views.		
☐	<u>§ 671.13(d)(6)</u> Locations with heavy outside noise or other environmental conditions that impact on-track safety.		
☐	<u>§ 671.13(d)(7)</u> Any other locations with access considerations.		

Manual Review, Updates, and Distribution

FTA recommends that RTAs document their review process and findings, which may conclude that no changes are needed. This documentation ensures RTA compliance with the requirement, provides a record that the review was carried out as mandated, and notes that review findings indicated no changes were required.

The RWP manual specifies:

☒	Checklist Item	Page Number	Comments
☐	§ 671.13(e) The process for reviewing and updating the RWP manual, not less than every two years after initial approval, to reflect current conditions and lessons learned in implementing the RWP program and information provided by the SSOA and FTA.		
	 <i>Lessons learned may include: Results of RWP compliance monitoring, lessons learned from safety events and near misses, and results of the agency's monitoring of redundant protection effectiveness.</i>		
	 <i>Information provided by an oversight authority (e.g., the SSOA and FTA) may include: Relevant State and Federal regulatory updates, information related to investigations or audit findings, industry best practices, and suggestions for improvement.</i>		
☐	§ 671.13(f) The process for updating the RWP manual and track access guide as necessary and as soon as practicable upon any change to the system that conflicts with any element of either document.		
☐	§ 671.13(g) The RWP manual is distributed to all transit workers who access the roadway and is redistributed after each revision.		

	Checklist Item	Page Number	Comments
	 <i>RTAs are not required to distribute a physical copy of the manual to all transit workers who access the roadway. RTAs may select the distribution format, which could include electronic dissemination, as long as workers have access to up-to-date versions.</i>		