Part 671

Rail Transit Roadway Worker Protection: Street-Running and Small Systems

10/1/2025

U.S. Department of Transportation
Federal Transit Administration

Purpose and Agenda

Purpose: Discuss 49 Code of Federal Regulations (CFR) part 671, the Rail Transit Roadway Worker Protection (RWP) rule, and how it may apply to operators of street-running and small rail transit systems

Webinar Agenda:

- Overview
- RWP rule timeline
- Street-running rail RWP examples

Important Notes

This 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.

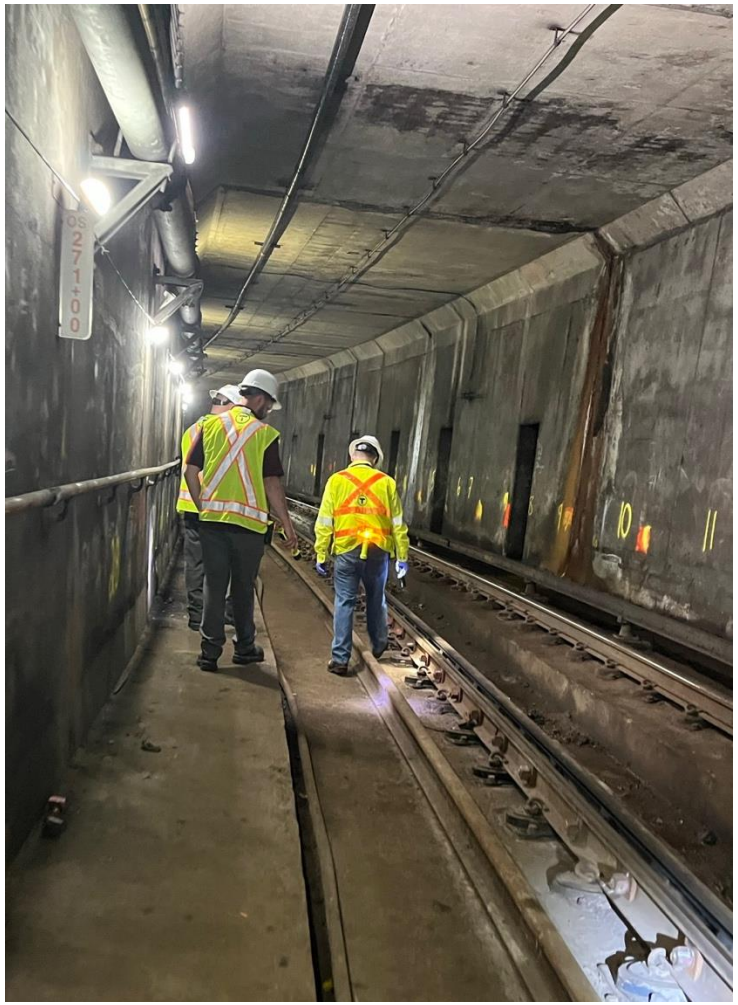
Throughout the presentation, specific regulatory requirements will include a citation to the RWP final rule.

All additional information, including the examples, are intended to serve as technical assistance. Examples are intended to demonstrate how transit agencies may adopt the RWP requirements to unique operating environments.

What Is Part 671?

Part 671 establishes minimum safety standards for rail transit RWP to:

- Ensure the safe operation of public transportation systems
- Prevent safety events, fatalities, and injuries to transit workers who access the roadway in performance of work



49 CFR part 671.3

To Whom Does Part 671 Apply?

Part 671 applies to...

Rail transit agencies (RTAs) that receive Federal financial assistance authorized under 49 U.S.C. chapter 53

State Safety Oversight agencies (SSOAs) that oversee the safety of rail fixed guideway public transportation systems

Transit workers who access any rail fixed guideway public transportation system in the performance of work

Part 671 does not apply to:

Rail systems subject to the safety oversight of the Federal Railroad Administration (FRA)

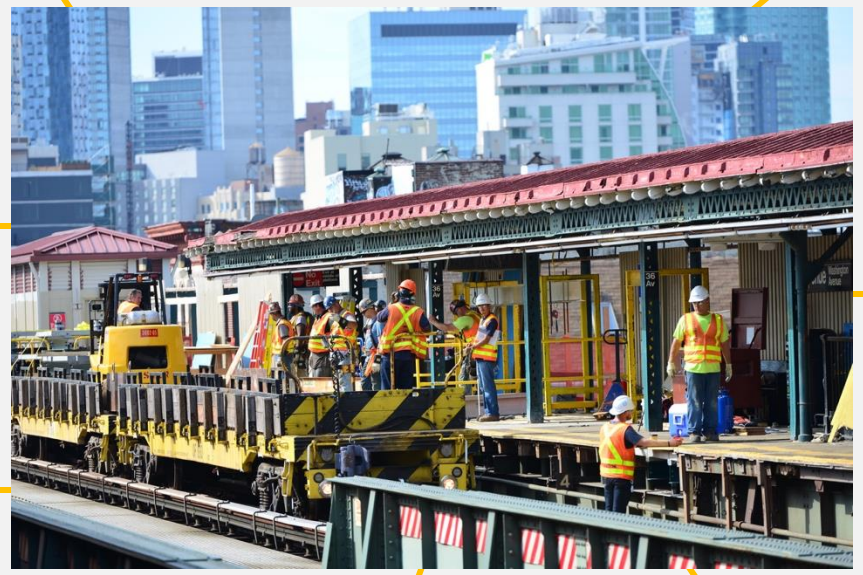
49 CFR part 671.1

RWP Key Requirements

Develop and implement an RWP program, and receive SSOA approval
49 CFR part 671.11(a) & 671.25(a)

Must document RWP programs in a dedicated manual, which includes or incorporates a Track Access Guide
49 CFR part 671.13(d)

Job Safety Briefings
49 CFR part 671.33



Establishment of RWP training and qualification and RWP compliance monitoring activities
49 CFR part 671.41 & 671.43

Prohibition of individual rail transit vehicle detection; implementation of risk-based redundant protections for workers
49 CFR part 671.21(a)(2) & 671.39

On-track safety and supervision requirements
49 CFR part 671.21(b) & 671.35(a)

Good-faith safety challenges and reporting unsafe acts and conditions and near-misses
49 CFR part 671.37 & 671.23(e)

Key Notes on Flexibility

1. RWP plans should reflect the size and complexity of the rail transit system
2. Agencies can build on or update existing RWP programs
3. There are many acceptable approaches to meeting regulatory requirements
4. SSOAs and RTAs can coordinate to identify creative solutions

Part 671 Compliance Timeline

10/31/23	12/2/2024	12/2/2025	After SSOA approves RWP program
Part 671 published	Part 671 effective – Starts clock on SSOA-approved RWP program development	Deadline for RTAs to establish an SSOA-approved RWP program	**As necessary:** • RTAs update the RWP manual and track access guide after any change that conflicts with these materials **Quarterly:** • RTAs report to their SSOA on compliance with and sufficiency of RWP program **Annually:** • RTAs brief Accountable Executive and Board of Directors, or equivalent entity, on RWP program performance • SSOAs audit RTA compliance with RWP program **Within two years of initial approval and every two years thereafter:** • RTAs review and update RWP manual, submit to SSOA for review and approval

Street-Running Rail: Operating Considerations

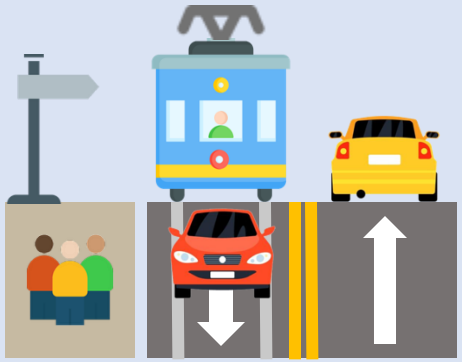
Streetcar Environment

- Mixed-use environment
- Each system has its own unique attributes and potential hazards
- Maintenance and inspection exposes workers to additional hazards

Street-Running Rail and RWP

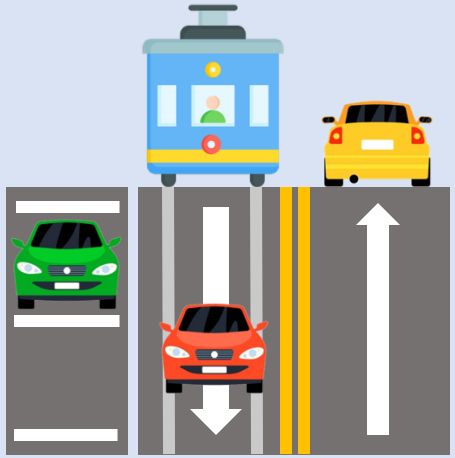
In the following slides, we will examine how a street-running agency may approach RWP requirements.

The requirements and their accompanying examples are organized under three different scenarios in three different environments:



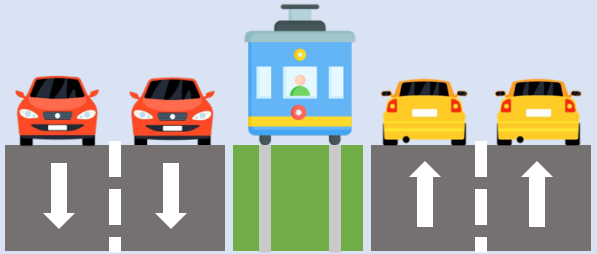
Catenary Maintenance

- RWP Manual
- Roadway Worker in Charge (RWIC)
- Job Safety Briefing
- RWP Training and Qualification Program



Debris/Drain Clearing

- Track Access Guide
- Redundant Protections
- Good Faith Safety Challenge
- RWP Compliance Monitoring Program



Vegetation Maintenance

- Lone Worker
- Lone Worker Redundant Protections
- Safety Risk Assessment

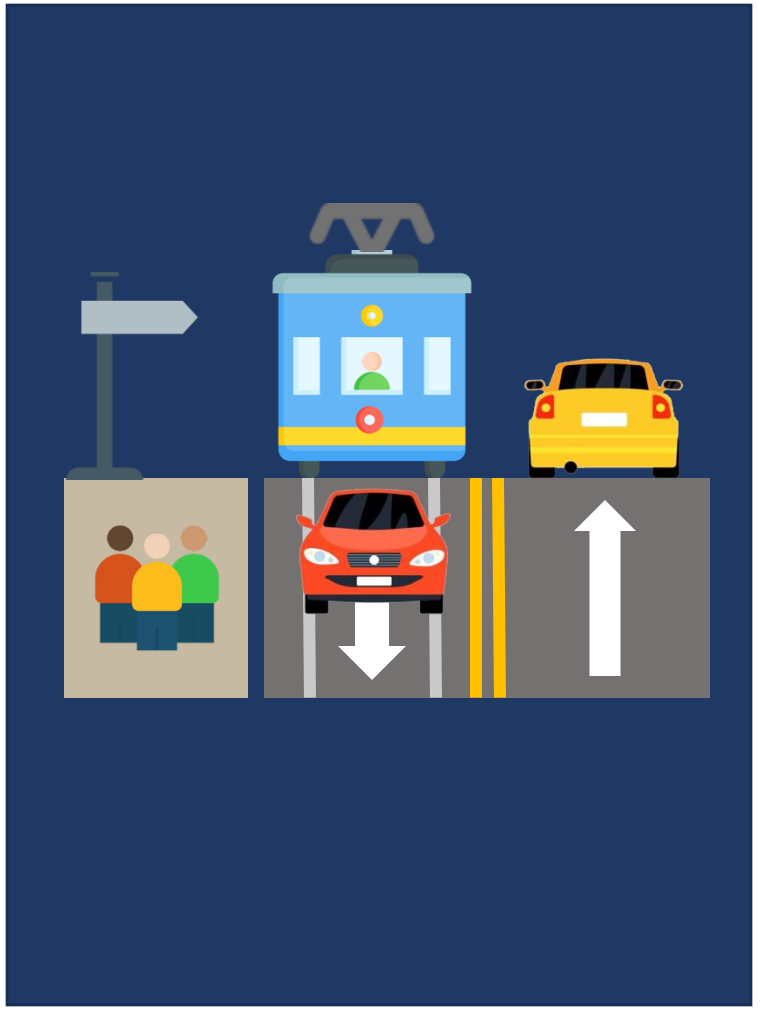
Street-Running Rail RWP Examples

Scenario 1: Overhead Catenary System (OCS) Preventive Maintenance and Inspection

A streetcar runs with traffic on one side of the track and public spaces and sidewalk on the other.

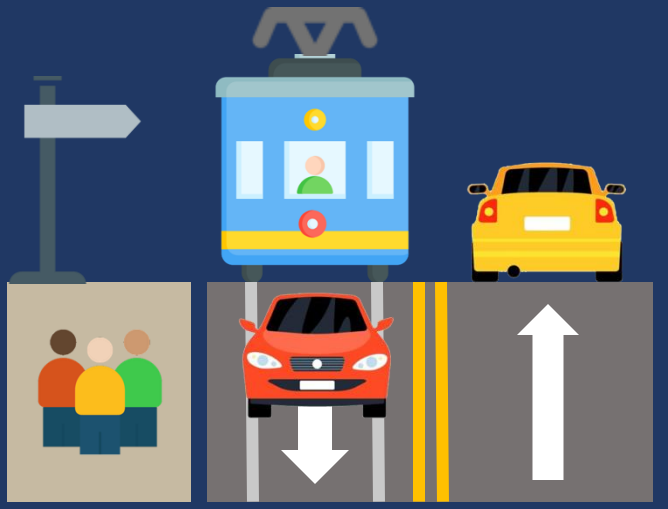
The **OCS** runs above the street, intersections, and sidewalk, and, in some portions, is anchored to a building face.

It requires frequent inspection and planned, corrective, and emergency maintenance.



How Part 671 May Apply to Scenario 1

- RWP Manual
- Roadway Worker in Charge
- Job Safety Briefing
- RWP Training and Qualification Program



This is not an exhaustive list of applicable requirements for Scenario 1. Agencies should refer to Part 671 for all requirements.

Requirements for an RWP Manual (§ 671.13)

Each RTA must establish and maintain a **separate, dedicated manual** documenting its RWP program.

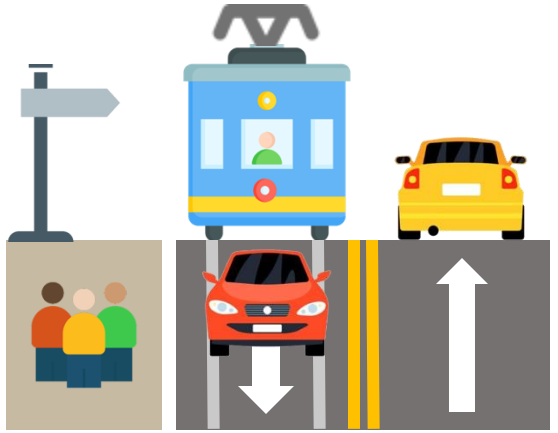
The RWP manual must:

- Include terminology, abbreviations, and acronyms.
- Include or incorporate by reference a track access guide.
- Document:
  - All required RWP Program elements.
  - Definitions of RTA and transit worker responsibilities.
  - Training, qualification, and supervision required for transit workers to access the track zone, by labor category or type of work performed.
  - Processes and procedures for all transit workers who may access the track zone in performance of work.

RWP Manual for OCS Example

The RTA in Scenario 1 needs workers to perform preventive maintenance and inspection of the OCS. The RWP manual may include information on when the RTA should:

- Coordinate with local traffic enforcement and develop a traffic plan. Service will be suspended and the track taken out of service.
- De-energize, lock out, and tag out catenary power.
- Assign a RWIC and conduct a **job safety briefing,** identifying potential hazards prior to the commencement of work.
- Check for required personal protection equipment (PPE) and valid ROW credentials with up-to-date qualifications.



Employees are not required under this rule to carry the RWP manual on their person. The rule only requires the RTA to distribute the RWP manual to all transit workers who access the roadway.

Note: This example is intended to serve as technical assistance and demonstrate how transit agencies may choose to adopt the RWP requirements in unique operating environments. Agency conformity with the specific RWP policies outlined in the example is voluntary only. RTAs should coordinate with SSOAs to identify effective RWP policies in their own operational context.

Requirements for a Roadway Worker in Charge (§ 671.31)

The RTA must designate one RWIC for each roadway work group whose duties require fouling a track

- Responsible for:
  - The on-track safety of all members of the roadway work group and must serve only that function.
  - Performing job safety briefings.
- Must be qualified under RTA's training and qualification program.
- May be designated generally or specifically for a particular work situation.
- RTAs may designate a single RWIC for multiple roadway work groups within common working limits.
  - Each work group within the common working limits must be accompanied by a worker qualified to the level of an RWIC who is responsible for direct communication with the RWIC.

Roadway Worker in Charge for OCS Example

As part of their safety responsibilities, the RTA may require the RWIC to:

- Work on administrative tasks and work zone setup
- Address unique characteristics of working near vehicle traffic during job safety briefing and re-briefings.
- Serve as a flagger to provide additional worker protection.

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Requirements for Job Safety Briefing Policies (§ 671.33)

The RTA must ensure the RWIC provides any roadway worker who must foul a track with a job safety briefing prior to fouling the track every time the roadway worker fouls the track.

- The RWIC must:
  - Confirm that each roadway worker understands the on-track safety procedures and instructions and obtains written acknowledgement.
  - Confirm in writing the receipt of each roadway worker's acknowledgement.
  - Conduct a follow-up safety briefing if there is any change in the scope of work or roadway group, on-track safety conditions change, or a violation of on-track safety is observed.

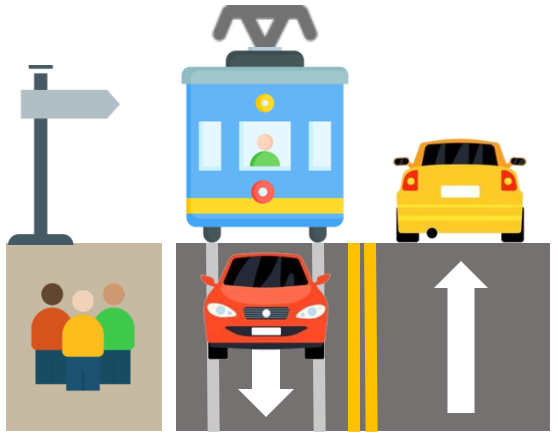
Job Safety Briefing for OCS Example

The RWIC may include following points as part of their briefing:

- Communicating the status of power to the OCS
- What traffic patterns are around the system and any changes made for worker protection.
- Where to go to access a place of safety away from the tracks.

The RWIC must provide a follow-up job safety briefing should the work conditions change (§ 671.33(d)). Here, the RWIC could do so:

- Before increased traffic during rush hour.
- When additional roadway workers are added to the crew.
- If there is a change in weather.



For street-running systems, FTA notes that job safety briefings can address the fact that transit workers may be fouling the track continually throughout the course of a working shift.

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Requirements for RWP training and qualification program (§ 671.41)

Each RTA must adopt an RWP training program.

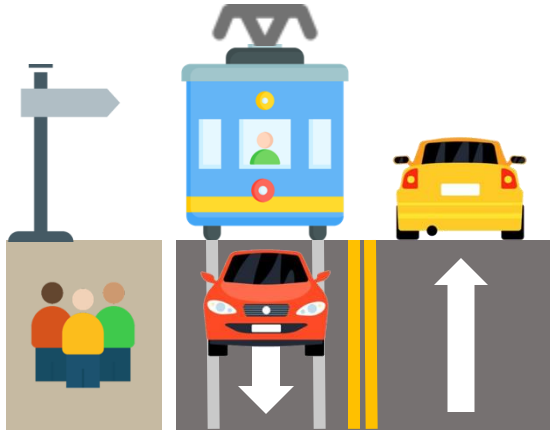
- The training program must address:
  - All transit workers responsible for on-track safety by position.
  - RWP hazard recognition and mitigation and lessons learned.
  - The required elements and minimum contents for training listed in the regulation.
- A transit worker must complete the training program for the relevant position before the RTA may assign that worker to perform the duties of that position.
- The training program must include:
  - Interactive initial and refresher training (no less than every two years), by position.
  - Specialized training and qualification for transit workers with additional responsibilities for on-track safety.
- Each RTA must:
  - Ensure the competency and qualification of training personnel.
  - Review and update the RWP training program no less than every two years.

RWP Training and Qualification for OCS Example

Exposed energized power lines (arcing), wire tension, and anchoring infrastructure are all unique potential hazards associated with OCS inspection and maintenance.

The RTA training could include information on:

- The hazards associated with working on or near rail transit tracks, including traction power.
- Recognition of the track zone and understanding of the space around tracks where on-track safety is required.
- Specialized training for the equipment operator and the transit worker inspecting the catenary.
- Specialized training for vehicle traffic management in non-exclusive ROW.



Each labor category or worker classification may have distinct requirements based on the nature of the work they perform, which might require distinct training or supervision.

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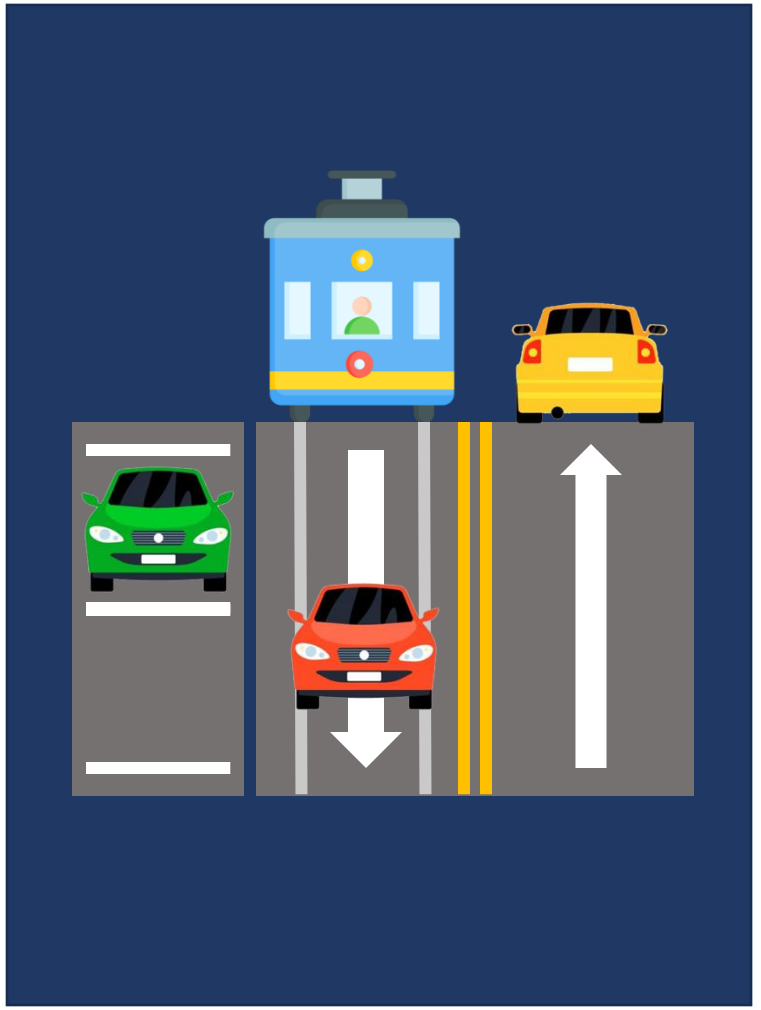
Scenario 2: Debris/Drain Cleaning

A streetcar travels down a narrow street of significant grade, shared with vehicular traffic, with curb parking on the right.

Transit workers are scheduled to clear drains between the embedded rail due to substantial rainfall and debris buildup.

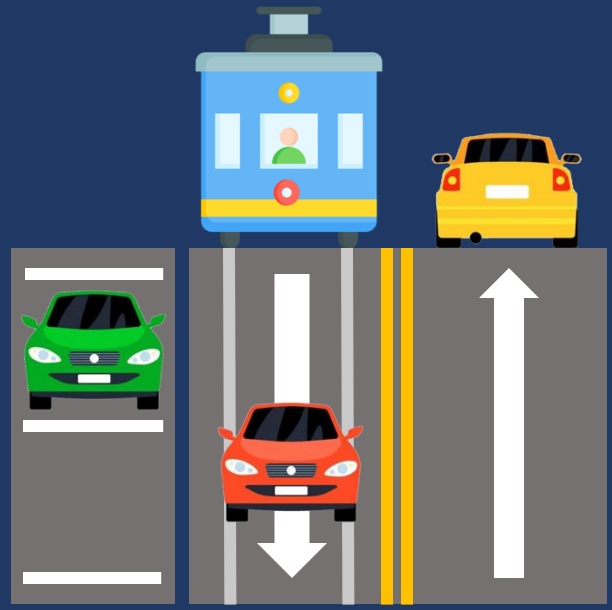
Safe space along the track section is limited. Work had previously been done on weekends with much less traffic. This location was not previously identified in the track access guide. There is no traffic plan associated with this task.

The roadway workers assigned to the task have multiple concerns about their safety and the level of protection.



How Part 671 May Apply to Scenario 2

- Track Access Guide
- Redundant Protections
- Good Faith Safety Challenge
- RWP Compliance Monitoring Program



This is not an exhaustive list of applicable requirements for Scenario 2. Agencies should refer to Part 671 for all requirements.

Requirements for a Track Access Guide (§ 671.13(d))

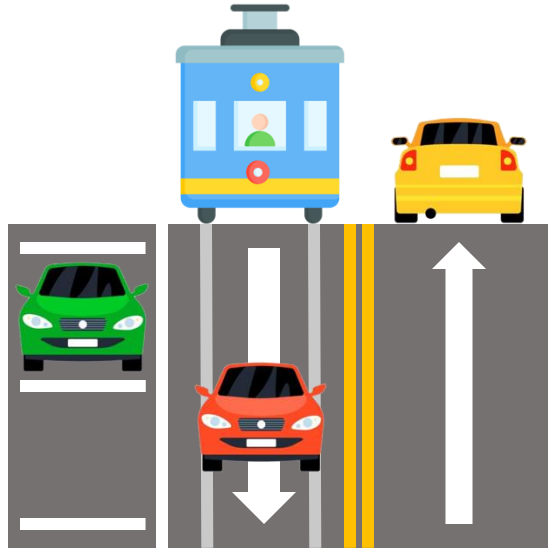
The RWP manual must include or incorporate by reference a track access guide to support on-track safety. The track access guide must be based on a physical survey of the track geometry and condition of the transit system and include minimum requirements specified in § 671.13(d).

Track Access Guide for Cleaning Example

It is essential that workers be aware of their environment and potential hazards and take the necessary steps to eliminate and reduce risk.

The track access guide may:

- Specify the place of safety for this track zone.
- List specific information that accounts for the obstructions that occur, like parked vehicles, which may impact the ability of workers to access a place of safety.
- Indicate that the location typically has heavy outside noise from traffic or other environmental conditions that impact on-track safety.
- Give specifications on elevation, hills, tilts, and grades.



RTAs may design their track access guides to address the requirement's components to a degree of detail that is appropriate based on their respective systems.

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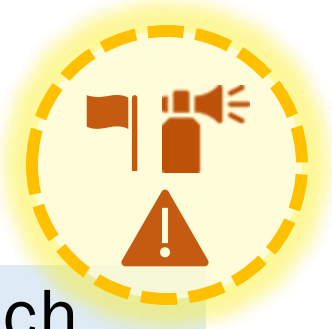
Requirements for Risk-Based Redundant Protections (§ 671.39)



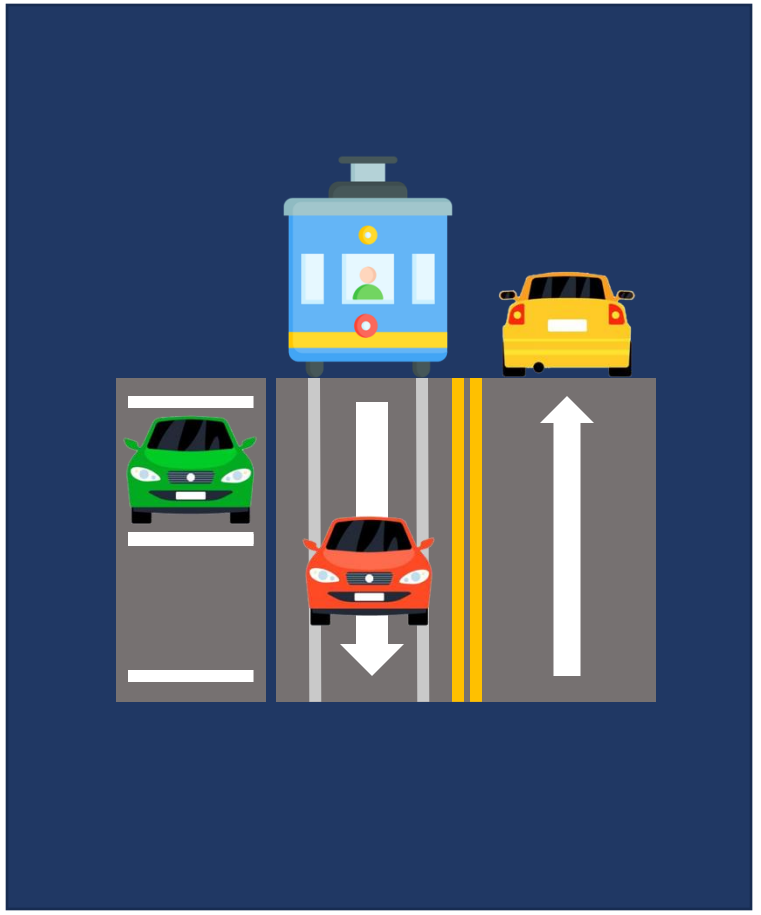
Each RTA must identify and provide redundant protections for each category of work roadway workers perform on the roadway or track.

- RTAs must establish redundant protections to ensure on-track safety for multiple roadway work groups within a common work area.
- RTAs must conduct a safety risk assessment to establish redundant protections.
- The SSOA may also identify and require an RTA to implement alternate redundant protections based on the RTA's unique operating characteristics and capabilities.
- Redundant protections may be procedural or physical.

Redundant Protections for Cleaning Example

Using the RTA's safety risk assessment process, the RTA identified risk-based redundant protections for this work area.

- The RTA may work with the city to detour traffic, temporarily suspend parking, and limit pedestrian traffic in the area.
- An RTA may require the debris-clearing team to:
  - Use flaggers.
  - Conduct work during a specific time when no streetcars are in operation and no other maintenance is being conducted.



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Requirements for Good Faith Safety Challenges (§ 671.37)

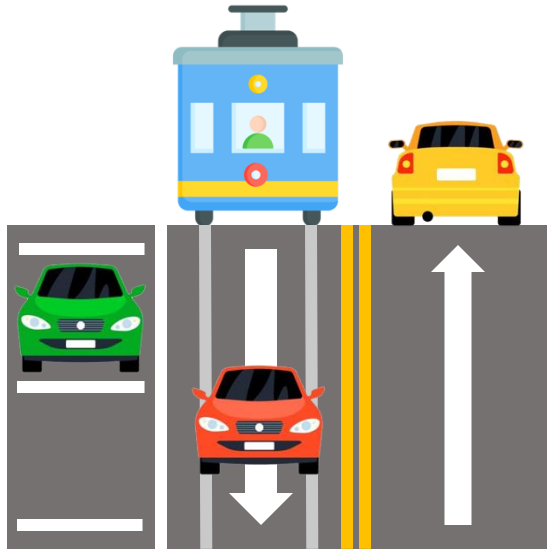
Each RTA must document procedures that provide every roadway worker the right to challenge and refuse in good faith any assignment they believe is unsafe or would violate the RTA's RWP program.

- This must include:
  - Methods or processes to achieve prompt and equitable resolution of any challenges and refusals made.
  - A requirement that the roadway worker provide a description of the safety concern regarding on-track safety.
  - The requirement that the roadway work group remain clear of the roadway or track zone until the challenge and refusal is resolved.

Good Faith Safety Challenge for Cleaning Example

The RTA encourages all workers to assess their work environment before and during their tasks. If conditions change significantly, transit workers are empowered to initiate a good faith safety challenge when they deem it necessary.

- The RWIC keeps each member of the work group clear of the roadway and track zone until the challenge is resolved.
- The RWIC may use the RWP manual at the worksite as a reference to address good faith safety challenges.



In their good faith safety challenge procedures, RTAs are expected to address safely stopping work.

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Requirements for RWP Compliance Monitoring Program (§ 671.43)

Each RTA must adopt a program for monitoring its compliance with the requirements specified in its RWP program.

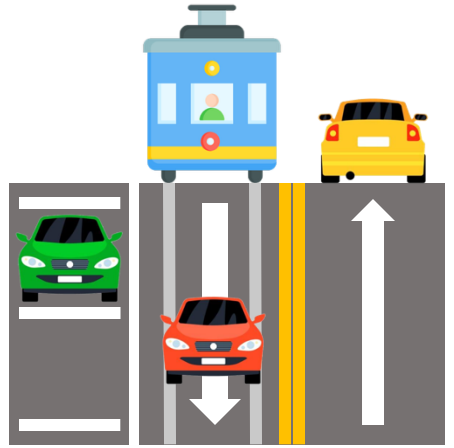
- The compliance-monitoring program must include inspections, observations, and audits.
  - This should be consistent with the safety performance monitoring and measurement requirements in the RTA's Agency Safety Plan (ASP) and the SSOA's program standard.
- The RTA must provide:
  - Quarterly reports to the SSOA documenting the RTA's compliance with and the sufficiency of the RWP program.
  - An annual briefing to the Accountable Executive and Board of Directors, or equivalent entity, regarding the performance of the RWP program and any identified deficiencies requiring corrective action.

RWP Compliance Monitoring Program for Cleaning Example

The RTA's compliance monitoring program MUST include inspections, observations, and audits, consistent with safety performance monitoring and measurement requirements in the RTA's ASP.

In this case, the RTA might use these tools for:

- **Observing** the job safety briefing to ensure it meets the requirements and that individual worker acknowledgement is occurring.
- **Inspecting** the work zone to ensure redundant protections have been established as specified in the RWP manual.



The requirement for compliance monitoring is consistent with and works in concert with Safety Assurance principles for safety performance monitoring and measurement required by the PTASP regulation.

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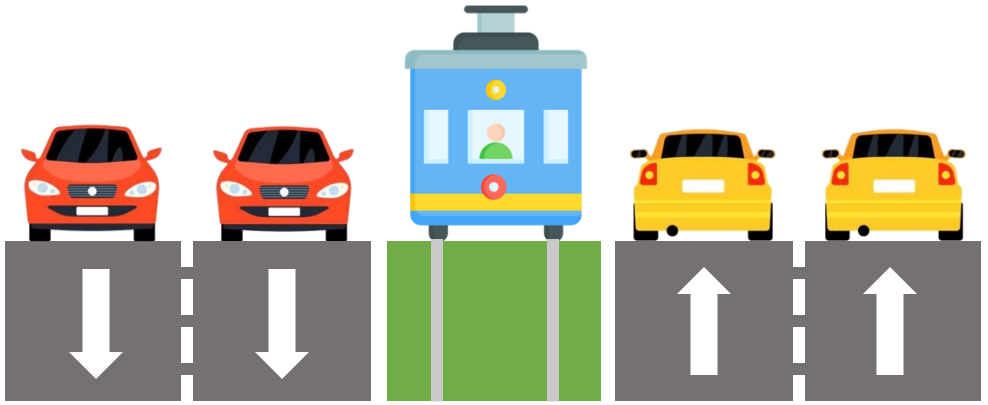
Scenario 3: Vegetation Maintenance by a Lone Worker

A streetcar operates down a wide grass median with constant vehicular traffic on each side.

Pedestrians often cross the track as the nearest corner crosswalk is a considerable distance away.

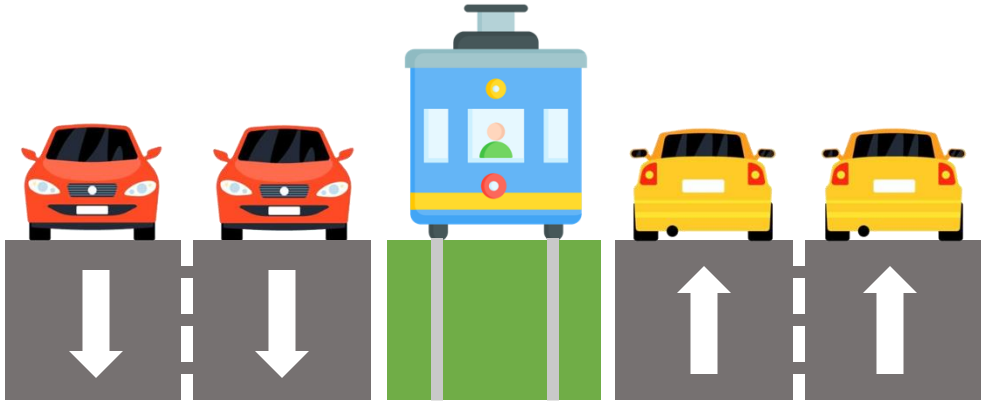
The area occasionally requires grass cutting and vegetation maintenance.

A lone worker is assigned ahead of the landscaping crew to clear debris such as limbs and trash.



How Part 671 May Apply to Scenario 3

	Lone Worker
	Lone Worker Redundant Protections
	Safety Risk Assessment



This is not an exhaustive list of applicable requirements for Scenario 3. Agencies should refer to Part 671 for all requirements.

Requirements for Lone Workers (§ 671.35)

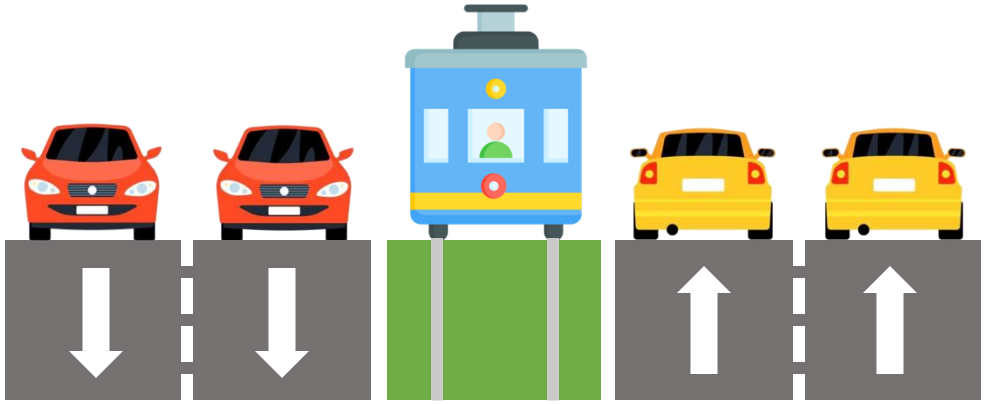
The RTA may authorize lone workers to perform limited duties that require fouling a track.

Lone workers

- Must be qualified as a roadway worker in charge and a lone worker under the RTA's training and qualification program.
- May perform routine inspections or minor tasks and move from one location to another but may not use power tools.
- May only access locations defined in the RTA's track access guide as appropriate for lone workers.
- May not use individual rail transit vehicle detection as the only form of on-track safety.
- Must communicate prior to fouling the track with a supervisor or another designated employee to receive an on-track safety briefing.
- Must acknowledge and document the safety briefing in writing.

Lone Worker Vegetation Maintenance Example

- An RTA's Track Access Guide could establish this work location as appropriate for a lone worker.
- The RTA could dispatch a qualified lone worker to perform tasks such as:
  - Routine inspections of the track and any surface drainage systems.
  - Clearing large debris ahead of a mowing crew.
  - May use non-power tools to perform work.



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Requirement for Lone Worker Redundant Protections (§ 671.39(d)(3))

Redundant protections for lone workers must include, at a minimum, foul time or an equivalent protection approved by the SSOA.

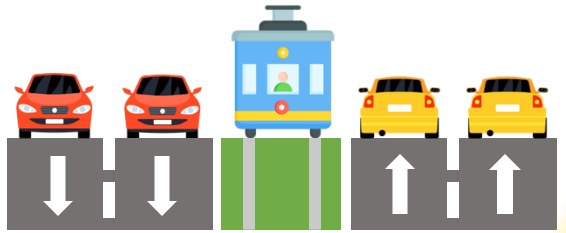
Equivalent protection means alternative designs, materials, or methods that the RTA can demonstrate to the SSOA will provide equal or greater safety for roadway workers than the means specified in this part. (§ 671.5)

There must always be at least two protections, and beyond that, the number of protections will depend on the work environment and the results of the RTA's safety risk assessment.

Lone Worker Redundant Protections Vegetation Maintenance Example

To complete grounds clean up, the RTA could require foul time or receive approval for equivalent protections that the SSOA may consider appropriate, such as:

- Traffic cones and flags on the track to remind operators of work on the track in front of them.
- Requiring operators to signal their presence by horn before they enter the work zone.
- Restricting streetcar speed to 5 mph in the work area.



The lone worker may not use individual rail transit vehicle detection, where the lone worker is solely responsible for seeing approaching trains and clearing the track before the trains arrive, as the only form of on-track safety.
(§ 671.35(a)(3))

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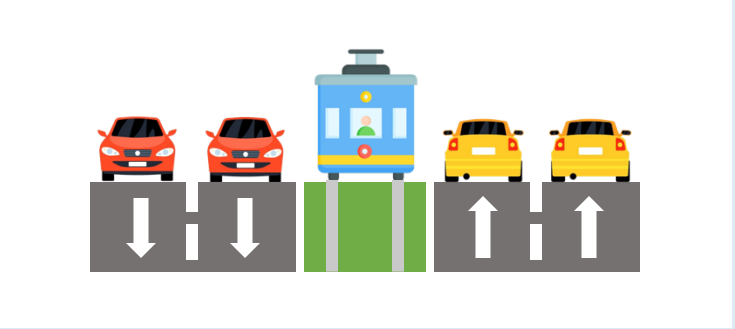
Requirements for Safety Risk Assessment (§ 671.39(b))

Each RTA must assess the risk associated with transit workers accessing the roadway using the methods and processes established under 49 CFR § 673.25(c) (safety risk assessment).

- The RTA must use its safety risk assessment methods and processes **to establish redundant protections** for each category of work performed by roadway workers, **including lone workers.**
- The safety risk assessment must be consistent with the RTA's ASP and the SSOA's program standard.
- The safety risk assessment may be supplemented by engineering assessments, inputs from the safety assurance process (§ 673.27), the results of safety event investigations, and other safety risk management strategies or approaches.
- The RTA must review and update the safety risk assessment at least every two years to include current conditions and lessons learned.

Safety Risk Assessment Vegetation Maintenance Example

- An RTA could employ its safety risk assessment process to assess the identified hazards for this category of work for lone workers.
  - It may identify hazards through:
    - Transit worker safety reports
    - Near-miss reports
    - Event investigations
    - Information from workers who had conducted this type of work in the past.



- The RTA could use these assessments, input from the Safety Committee and subject matter experts to establish redundant and equivalent protections for this category of work and include them in its RWP manual.
- The RTA could work proactively with the SSOA for approval of redundant and equivalent protections.

Note: This example is intended to serve as technical assistance and demonstrate how transit agencies may choose to adopt the RWP requirements in unique operating environments. Agency conformity with the specific RWP policies outlined in the example is voluntary only. RTAs should coordinate with SSOAs to identify effective RWP policies in their own operational context.

Question and Answer

Questions welcome via the chat

If we do not have the opportunity to respond to your question today, we will process remaining applicable questions after the webinar.

You can also email FTASystemSafety@dot.gov with further questions.

See FTA's RWP web page for more information and Frequently Asked Questions

- RWP Program Checklist
- Rail Transit RWP Final Rule Overview Webinar

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U.S. Department of Transportation
Federal Transit Administration