

FINAL

BSD Roadway Worker Protection Manual

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Signatures

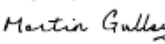
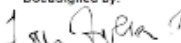
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General Manager of Safety, Bi-State Development

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I. PURPOSE AND SCOPE

This MetroLink Roadway Worker Protection (RWP) Manual explains the rules, procedures, and safety practices for anyone working in or near the MetroLink Operating Right-of-Way (OROW).

It follows federal requirements in 49 CFR Part 671 (FTA's Roadway Worker Protection Rule) and Metro Transit procedures:

- SOP 103.04 – Right of Way Worker Protection
- SOP 101.17 – Work Performed on the MetroLink Right of Way

SOP 101.7 (Work Performed on the MetroLink Right-of-Way) and SOP 103.7 (Right-of-Way Protection) are incorporated by reference and will be reviewed concurrently with this manual to ensure alignment with 49 CFR Part 671 and Metro Transit's RWP Program.

Metro Transit's Commitments

- Prevent unauthorized access to the OROW
- Require certified flaggers or protective systems for all active right-of-way work
- Ensure all personnel are trained, qualified, and compliant with oversight rules

Who This Manual Applies To

- Metro Transit employees
- Contractors and subcontractors
- Emergency responders
- State Safety Oversight Agency staff
- Anyone working within 20 feet of the track centerline

Access Requirements

No one may enter the right-of-way unless:

1. Certified: Completed MetroLink RWP Training (SOP 101.17).
2. Permit Approved: Has a valid ROW Work Permit for planned work.
3. Department/Contractor Responsibility: Weekly permits submitted for scheduled work.

Exceptions: OCC may allow Metro employees to enter without a permit for unplanned/emergency work.

Flagging: A qualified Flag Person or Lookout must be present unless OCC authorizes otherwise. (See Section 9 for Lone Worker rules.)

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Manual Updates

The RWP Manual is reviewed:

- At least every 2 years
- After major changes
- When directed by the FTA or State Safety Oversight Agency
- The RWP Manual and Track Access Guide shall be updated as soon as practicable following any change in infrastructure, procedures, or system operations that could affect worker safety or conflict with these documents.

Distribution

This manual is:

- Given to all Metro Transit staff, supervisors, contractors, and flaggers
- Shared in Tier 1, 2, and 3 training
- Available electronically in BSD's policy and procedure system

II. SYSTEM OVERVIEW

MetroLink is the light rail system serving the Greater St. Louis region, operated by Metro Transit. The network includes 38 stations across Missouri and Illinois, with two lines—the Red Line and Blue Line, sharing a central trunk through the urban core before branching to serve outlying communities. MetroLink's fleet of 75 light rail vehicles (LRVs) provides daily service linking downtown St. Louis, the Central West End medical district, university campuses, business centers, entertainment venues, and both St. Louis Lambert International and MidAmerica St. Louis airports.

The system is powered by an overhead catenary system (OCS) delivering 860 volts DC through an overhead wire network. The OCS is supported by traction power substations, balance weight assemblies, and midpoint anchors that maintain proper wire tension across all weather and operating conditions. Maintenance of the OCS and substations is handled by the Maintenance of Way department, with system status and power operations coordinated through the Operations Control Center.

MetroLink operates primarily in exclusive right-of-way, supported by the Operations Control Center, Maintenance of Way, Vehicle Maintenance, Safety, Structures, Rail Systems and Public Safety divisions to ensure safe, reliable, and accessible service for the region.

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III. TERMINOLOGY AND SYSTEM DEFINITIONS

ALL DEFINITIONS, ACRONYMS, AND ABBREVIATIONS IN THIS MANUAL FOLLOW ALPHABETIZED ORDER TO MEET 49 CFR PART 671.5 CONVENTIONS.

Accountable Executive

The individual with ultimate responsibility for carrying out the Public Transportation Agency Safety Plan and Transit Asset Management Plan, and for allocating the resources required to maintain both.

Ample Time

The minimum time required for a roadway worker to reach a place of safety before a rail transit vehicle arrives. MetroLink uses a minimum of 15 seconds.

Equivalent Entity

An entity with authority equivalent to a Board of Directors that reviews and approves the Public Transportation Agency Safety Plan.

Equivalent Protection

Alternative designs, materials, or methods demonstrated by the RTA to provide equal or greater safety than those specified in regulation.

Exclusive Track Occupancy (ETO)

A method of on-track safety in which OCC withholds movement authority of all trains and roadway maintenance machines within a designated working limit.

Foul Time

A method of establishing working limits in which OCC confirms no rail transit vehicles or machines will enter a specific track segment until the designated roadway worker reports clear.

Fouled Track

Any location within 8 feet 6 inches of the track centerline. Entry requires active protection.

Flag Person (Flagger)

A qualified worker responsible for controlling train movement and protecting the work zone through communication and advance warning.

Job Safety Briefing (JSB)

A mandatory, documented briefing conducted by the RWIC before any work begins. It identifies hazards, protections, communication plans, emergency procedures, and limits of authority.

Learning Management System (LMS)

Metro's digital platform used to deliver and manage RWP training and qualifications.

Lone Worker

An individual roadway worker who is not part of a work group and is not afforded protection by another roadway worker.

Lookout

A Tier 2-qualified worker whose sole responsibility is to detect approaching trains and warn roadway workers.

Maximum Authorized Speed

The highest speed permitted for rail transit vehicle movement under operating rules and control systems and used to calculate ample time.

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Minor Tasks

Tasks performed without tools, where the worker can visually and audibly assess surroundings at least every five seconds and maintain ample time at all times.

Multiple Work Groups

Two or more roadway worker groups operating within the same or overlapping portions of the OROW.

Near-miss

A narrowly avoided safety event.

No Clearance Zone

A location where physical clearance is less than 8 feet 6 inches from the nearest track centerline.

On-track Safety

The protections, methods, and procedures used to ensure roadway workers are not struck or placed at risk by the movement of rail transit vehicles or on-track equipment.

Operating Clearance

The official authorization from OCC required before track work or access may begin.

Operating Right-of-Way (OROW)

The area within 20 feet of the track centerline. Entry triggers RWP requirements.

Pre-Arranged Place of Safety

A designated safe location outside the fouled area where workers must relocate when a train approaches.

Qualified Person

A worker certified under MetroLink's RWP training program and authorized to perform work within the OROW.

Rail Fixed Guideway Public Transportation System

A public transportation system using rail and not subject to FRA jurisdiction.

Rail Transit Agency (RTA)

An entity operating a rail fixed guideway public transportation system.

Rail Transit Vehicle

Any rolling stock used on a rail fixed guideway public transportation system, including passenger and maintenance vehicles.

Redundant Protection

One or more protections beyond individual train detection used to ensure on-track safety.

Roadway Maintenance Machine

A machine used on or near rail transit track for maintenance, inspection, construction, repair, or related work.

Roadway Work Group

Two or more roadway workers organized to perform a common task.

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Roadway Worker

A transit worker whose duties include inspection, construction, maintenance, repair, or provision of on-track safety.

Roadway Worker Protection (RWP)

The RTA's full program, rules, procedures, and protections designed to maintain on-track safety for roadway workers.

Roadway Worker in Charge (RWIC)

A Tier 2-certified worker responsible for establishing protections, conducting JSBs, coordinating with OCC, and ensuring compliance.

RWP Manual

The full set of the RTA's on-track safety rules and procedures for preventing roadway workers from being struck by rail transit vehicles or equipment.

Safety Event

An unexpected outcome resulting in injury, death, property damage, or environmental harm.

Secondary Warning Device

A physical or electronic device that provides additional warning of approaching trains.

Sight Distance

The visible length of track ahead at which a worker can reliably detect an approaching train and reach a place of safety.

State Safety Oversight Agency (SSOA)

A state agency that performs oversight functions as required by 49 CFR Part 674.

Track Access Guide

A document describing the physical characteristics of the track system relevant to establishing on-track safety.

Track Zone

An area where a person or equipment could be struck by the widest equipment that may occupy the track.

Transit Worker

Any employee, contractor, or volunteer working on behalf of the RTA or SSOA.

Transit Worker Safety Reporting Program

The program required by §673.23(b) for reporting unsafe conditions, near-misses, and safety concerns.

Watchperson

MetroLink's equivalent term for "Lookout."

Work Zone

The immediate area within the track zone where work activities occur.

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IV. ROLES AND RESPONSIBILITIES

All individuals performing work within or adjacent to the MetroLink Operating Right-of-Way (OROW) carry defined responsibilities to ensure compliance with federal regulations and Metro Transit policies. These responsibilities are established under 49 CFR Part 671 and Metro Transit's SOP 103.04 – Right of Way Worker Protection, SOP 101.17 – Work Performed on the MetroLink Right of Way, and this RWP Manual.

Metro Transit Responsibilities

Metro Transit is responsible for maintaining a compliant Roadway Worker Protection Program. This includes:

- Implementing program requirements in alignment with 49 CFR Part 671.
- Requiring that all OROW work is protected by a Flag Person or Lookout, unless an exemption is approved.
- Ensuring all workers are trained, certified, and carry valid credentials.
- Issuing and validating Operating Clearances and Track Access Permits.
- Enforcing the immediate removal of non-compliant personnel from the OROW.
- Reviewing and updating SOPs, training programs, and this manual to reflect current requirements.
- Conducting a formal RWP review and update at least once every two years.

Transit Worker Responsibilities

All personnel accessing the OROW must:

- Comply with the requirements of this RWP Manual and associated SOPs.
- Participate in and sign Job Safety Briefings before track access.
- Remain alert to hazards and emergency procedures at all times.
- Report unsafe conditions or procedural violations to the RWIC or Metro Safety.
- Carry valid RWP certification and present it upon request.
- Follow all Flagger instructions and respect designated work zone boundaries.

Roadway Worker in Charge (RWIC)

Every work group must have a designated RWIC. The RWIC must:

- Hold a Tier 2 certification, documented in writing for the assignment.
- Establish all protective measures, including flagging, lookout, and physical barriers.
- Conduct and document Job Safety Briefings.
- Verify worker credentials, PPE, and task understanding before work begins.
- Remain solely focused on safety responsibilities, including flagging, and not perform other tasks.
- Immediately notify the OCC of changes in work conditions, hazards, or emergencies.

Flag Person Responsibilities

Flag Persons provide active protection for work zones and must:

- Be Tier 2-certified and have received On the Job Training (OJT).
- Wear a red hard hat, safety vest, and carry a complete flagging kit (red and yellow flags, air horn, and MetroLink radio).
- Establish a protected work zone before crews or equipment enter the OROW.
- Maintain continuous observation of train movement and never leave post without relief.
- Use audible and visual signals to stop work and warn crews of approaching trains.
- Control the safe entry and exit of workers and equipment from the ROW.
- Perform no other duties while flagging (although they may also serve as RWIC when properly designated).

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Lookout Responsibilities

Lookouts may be used for short-duration access by Metro personnel only. Lookouts must:

- Be Tier 2-certified.
- Maintain constant visual and audible vigilance with clear sightlines in both directions.
- Provide timely warnings so workers can safely clear the track.
- Not be used in high-risk conditions such as:
 - Use of loud equipment that limits hearing.
 - Obstructed visibility, including tunnels or sharp curves.

Supervisors and Field Management

Supervisors overseeing track or ROW work must:

- Verify the presence and certification of the designated RWIC and Flag Person/Lookout.
- Conduct spot checks for PPE, flagging equipment, and compliance with permit conditions.
- Ensure all workers and contractors under their oversight are RWP-trained at the appropriate tier.
- Report observed deviations from this RWP Manual or relevant SOPs to Metro Safety and the OCC.

V. ON-TRACK SAFETY PROCEDURES

This section establishes the minimum safety protocols required before and during any activity conducted within the MetroLink Operating Right-of-Way (OROW). All procedures described below are mandatory and enforceable under SOP 101.17, SOP 103.04, and the federal Roadway Worker Protection (RWP) rule.

Entering and Fouling the Track

Fouling the track is defined as any position or placement of a person, tool, or equipment within 8 feet 6 inches of the track centerline. The following rules apply:

- No worker may foul a track without:
 - Permission from the Operations Control Center (OCC).
 - Completion of a documented Job Safety Briefing.
 - The presence of a Flag Person or Lookout (Tier 2-certified).*
- Unauthorized or unqualified personnel are strictly prohibited from fouling a track.
- Workers must maintain situational awareness at all times, looking in both directions before crossing or approaching track.

*****Exceptions may apply to Metro employees under Lone Worker Procedures*****

Safety Protocols within the OROW (20-Foot Zone)

Any work within 20 feet of a track centerline is considered within the OROW. The following apply:

- A Flag Person is required unless OCC grants a special exemption for minor tasks.
- Workers must remain inside clearly defined work zones or behind barricades when not actively engaged in work.
- Physical or passive barriers (such as fencing) do not replace the requirement for active protection (flagging or lookout coverage).

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In compliance with 49 CFR §671.33, Metro requires layered protections for all on-track and OROW activities. Protections include:

- Note: Metro does NOT utilize shunts or trip stops on the OROW for worker protection.**

Work may not begin until the RWIC conducts a formal Job Safety Briefing. The briefing must cover:

- All personnel must sign the Job Safety Briefing form and may not begin work until they fully understand the safety plan.

OCC must issue a formal Operating Clearance before work begins. The clearance will specify:

- RWICs and workers must carry a copy of the clearance while in the field. Unauthorized deviations from the clearance will result in immediate removal from the alignment.

Per SOP 103.04, the use of electronic devices (including cell phones, earbuds, and tablets) is strictly prohibited within the OROW unless required for authorized work (e.g., MetroLink-issued radios). Use of non-approved devices while fouling the track constitutes a violation of Metro policy and will result in removal from the work zone.

Additional requirements apply when working near specialized hazards:

- All specialized hazard conditions must be addressed during the Job Safety Briefing.

MetroLink requires the placement of “speed boards” when work crews are present within the OROW. The RWIC or Flagger must ensure that the yellow speed board is visible to provide a minimum clearance time of 15 seconds for workers to safely clear the track. When visibility of the yellow speed board is obstructed by track curvature, the RWIC or Flagger shall use the ProTran Personal Alert Device to verify and maintain the required minimum clearance time.

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VI. ENTERING THE RIGHT-OF-WAY

Access to the Operating Right-of-Way (OROW) is strictly regulated under federal Roadway Worker Protection (RWP) rules and Metro Transit's SOP 101.17 – Work Performed on the MetroLink Right of Way. Entry requires prior authorization, proper training certification, and the implementation of protective measures.

Authority and Access Control

The Operations Control Center (OCC) holds exclusive authority over all access to the OROW.

All personnel must have:

- A valid Tier-level RWP certification.
- An authorized Daily Operating Clearance (held by the Flagger or RWIC in active work zones).
- Identification that matches the certification records.

Entry without clearance or PPE is prohibited and constitutes a safety violation.

Right-of-Way Work Permit and Daily Clearance

- A Right-of-Way Work Permit is required for all planned work and must be submitted and approved in advance.
- Daily access must be revalidated with a Daily Operating Clearance issued by OCC. This clearance includes:
 - Location, mileposts, and hours of work.
 - Track(s) affected.
 - Required protective measures (flagging, lookout, speed restrictions).

Clearances must be available at the worksite and reviewed as part of the Job Safety Briefing.

Entry Procedure

Upon arrival at the worksite, all personnel must:

- Check in with the RWIC and/or designated Flagger.
- Review the Job Safety Briefing and sign the attendance form.
- Wait for confirmation from the Flag Person before entering the alignment.

No individual may enter the OROW independently or prior to the establishment of flagging protection.

Escorting Requirements for Non-Certified Personnel

- Individuals without active Tier 1 RWP training may only enter the OROW if escorted by a Metro employee who is Tier 2 certified.
- Escorting is limited to observation or inspection purposes only; no work activities may be performed.
- Escorts must maintain constant visual contact with the individual and may not be assigned to any other duties while serving as escort.

Short-Duration Entry by Metro Personnel

Under SOP 103.04 – Right of Way Worker Protection, Metro employees may be authorized for short-duration entry without a Flagger only when:

- The activity is inspection-only.
- The entry occurs under controlled conditions.
- A Tier 2-certified Lookout is present, and OCC has been notified.

This exception is reviewed on a case-by-case basis and may not be used as a routine practice.

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Emergency Access Protocols

In the event of an emergency, such as urgent repairs or immediate safety hazards, access may be granted without a formal ROW Work Permit. In such cases:

- OCC must authorize access verbally and document the approval.
- The individual entering must be Tier 2 certified.
- Continuous communication with OCC must be maintained.
- ***Emergency responders who enter the Operating Right-of-Way must have completed Tier 1 Roadway Worker Protection training. When emergency responders are present in the ROW, the OCC will stop all rail traffic on the affected track and hold movement for the duration of their presence. Because train movement is fully suspended, the RWIC is not required to provide a Job Safety Briefing. Emergency responders must remain under the direction of the RWIC or OCC-designated representative until cleared from the ROW.***

Violations and Enforcement

Any person found entering the OROW in violation of this section may be subject to:

- Immediate removal from the right-of-way.
- Referral to Metro Safety for review.
- Mandatory retraining or re-certification.
- Disciplinary action, including disqualification from future OROW access.

Coordination of Multiple Work Groups

In situations where work areas overlap or are in close proximity, the RWICs/Flaggers shall coordinate to establish a single, unified work zone. Each permitted group shall designate and maintain its own Roadway Worker in Charge (RWIC) or Flagger, who will be responsible for providing train movement warnings to their assigned personnel.

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VII. TRACK ACCESS GUIDE

The MetroLink Operating Right-of-Way (OROW) contains a variety of structural, environmental, and operational hazards that directly affect worker protection. This section identifies locations and conditions that require enhanced planning, safety procedures, and redundant protections in accordance with SOP 103.04 – Right of Way Worker Protection and BSD's Public Transportation Agency Safety Plan.

System Geometry and Physical Features

MetroLink's alignment presents unique features that require additional precautions:

- Curves and Obstructed Sight Lines-Reduced visibility of approaching trains. Enhanced flagging and lookout protection are required.

All curves, portals, topographically restricted areas, and locations where sightlines may be blocked or reduced must be reviewed in person by the RWIC before work begins. This includes any point where visibility is affected by curvature, structures, vegetation, retaining walls, grade changes, or environmental conditions such as weather or lighting. The schematic is not all-inclusive and does not capture every visibility restriction. If the RWIC has any concern about visibility, sight distance, or overall safety, the RWIC must notify the OCC immediately and no work may begin until clearance is provided.

- Elevated Structures and Bridges-Narrow walkways and minimal refuge areas require fall protection and the identification of pre-arranged places of safety.
- Tunnels-Limited lighting, poor radio transmission, and constrained evacuation routes. Job Safety Briefings must identify egress points and fallback locations.
- Pocket Tracks and Crossovers-Frequently used for layovers and turnbacks. Tracks may be energized or reactivated with minimal notice from OCC. Workers must confirm track status daily.

There are no locations on the MetroLink alignment that require increased braking distance beyond normal operating rules. MetroLink has reviewed the system and confirmed that braking performance does not affect the ability to maintain redundant protections or ample time.

No Clearance Zones

Certain areas along the alignment have restricted clearance:

- No Clearance Zones are marked in the field and documented. Entry into these areas requires pre-authorization from OCC and implementation of site-specific mitigations.

Weather and Environmental Hazards

Environmental conditions can create additional risks within the OROW:

- Ballast Instability – Rain, ice, and loose rock can cause slips, trips, and falls. Workers must verify footing before movement.

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- Heat Distortion – High summer temperatures can expand rails and create mirage effects that impair visibility.
- Overhead Catenary System (OCS) – Energized at 860 VDC. Hazards exist near poles, substations, and wire crossings.
 - Never lean ladders or tools against OCS infrastructure.
 - Assume all wires are energized at all times.

Restricted Work Zones and Signal Limitations

- High-Noise Environments – Areas such as interlockings or active construction sites can mask audible train cues. Additional lookout personnel or visual signaling is required.
- Signal Blind Spots – Locations where train operators have limited sightlines due to curves, slopes, or obstructions. These areas must be documented and reviewed with OCC and Metro Safety before access.

Emergency Access Points and Refuge Planning

Each worksite must include:

- Pre-Arranged Places of Safety – Clearly identified and communicated during the Job Safety Briefing, accessible at all times.
- Emergency Egress Points – Identified in advance, particularly in tunnels, bridges, or fenced alignments.

Workers must remain within a safe distance of these locations, which must remain unobstructed for the duration of the work activity.

Mapping and Access Planning

MetroLink Safety and Engineering maintain a master set of Track Access Hazard Maps. These maps are reviewed:

- During pre-bid meetings.
- At construction kickoff briefings.
- As part of the RWIC's Job Hazard Analysis (JHA).

All workers are responsible for familiarizing themselves with these maps and treating the identified areas as dynamic risk zones requiring heightened awareness and procedural discipline.

The Track Access Guide is based on a physical survey of MetroLink's alignment, documenting track geometry, curvature, clearance limits, noise zones, and areas of restricted visibility. BSD Engineering shall update this survey at least biennially, maintaining diagrams that identify hazards such as limited refuge areas, constrained walkways, or high-noise environments. These diagrams are incorporated into training and Job Safety Briefings for all roadway workers.

VIII: FLAGGING PROTECTION

Flagging protection is a required safety measure for all activities conducted within the MetroLink Operating Right-of-Way. This section outlines the qualifications, responsibilities, and procedures for flagging in compliance with SOP 103.04 – Right of Way Worker Protection and the FTA Roadway Worker Protection Rule (49 CFR Part 671).

Flagger Policy Integration

Flagging is required for all contracted work within the OROW. In certain cases, a Metro Lookout may be assigned at the discretion of the OCC, based on the approved work permit and discussions during the weekly track allocation process.

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When Flagging is Required

Flagging protection is mandatory for all activities within the OROW, including but not limited to:

- Construction or repair operations.
- Fence installation or removal.
- Surveying or layout work.
- Material delivery, staging, or offloading.
- Use of ladders, lifts, or other equipment near the track.
- Any activity that may cause a person, tool, or object to foul the track.

Note: Passive barriers such as orange fencing do not remove the requirement for flagging protection.

Exceptions (Strictly Limited)

The only exceptions to flagging, as defined in SOP 103.04, are:

- Short-duration visual inspections performed by Metro personnel.
- Emergency work specifically authorized by OCC.
- Contractor access when escorted by a Tier 2-certified Metro Lookout with prior OCC approval.
- Activities conducted more than 20 feet from the track centerline, confirmed by field measurement and documented in a signed Job Hazard Analysis (JHA).

All exceptions must be pre-approved, communicated to OCC, and documented in the MetroLink Incident Management System (MLIMS).

Flagger Qualifications and Certification

Flag Persons must:

- Hold Tier 2 certification under MetroLink's RWP training program.
- Successfully complete hands-on field assessments and demonstrate knowledge of flagging principles.
- Wear the following at all times while on duty:
 - Red hard hat (exclusive to flaggers).
 - ANSI Class 2 safety vest.
 - Approved safety glasses.
 - Safety-toed boots.

Flagger Equipment Requirements

Each Flag Person must carry and actively use:

- Yellow and red signal flags (day use).
- LED wands or flashlights (night or low-light conditions).
- An audible warning device (air horn or whistle).
- A MetroLink portable radio, pre-tested and functioning.
- A printed or digital copy of the Daily Operating Clearance.
- A ProTran Personal Alert Device.

Failure to carry or use required tools constitutes a flagging violation.

Duties and Conduct

Flag Persons are required to:

- Arrive on-site before the crew to establish the protected work zone.
- Perform no other duties while assigned to flagging.

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- Maintain constant visual and audible awareness of train and crew movement.
- Use standardized hand signals, flags, and audible devices to communicate with trains.
- Verbally alert workers and issue an all-clear after train passage.
- Notify OCC immediately if:
 - A worker fouls the track without authorization.
 - A train approaches at a speed above restrictions.
 - Work zone protection is compromised.

Work Zone Coordination

Flaggers are responsible for the controlled entry and exit of all crew members and equipment within the work zone. No person or object may cross or occupy the opposing track without OCC authorization through the Flagger.

Violations and Enforcement

Flagging duties are subject to oversight and enforcement. A Flagger may be removed or required to retrain if they are found:

- Leaving their assigned post.
- Failing to carry or use required equipment.
- Becoming inattentive or engaging in other tasks during flagging.
- Allowing unverified or unauthorized entry into the work zone.

All violations will be reviewed by Metro Safety and may result in retraining, re-certification, suspension, or disqualification from flagging duties.

IX: JOB SAFETY BRIEFINGS

A Job Safety Briefing is a mandatory, documented safety meeting that must be conducted before any worker fouls the track or enters the Operating Right-of-Way. The JSB ensures that all participants understand the scope of work, site hazards, protective measures, communication protocols, and emergency procedures. MetroLink enforces the JSB process in accordance with SOP 103.04-Right of Way Worker Protection, the FTA Roadway Worker Protection Rule (49 CFR Part 671), the BSD Contractor Safety Action Plan, and the Daily Safety Job Briefing form SOP 103.04 E.

When Job Safety Briefings Are Required

A JSB must be conducted:

- Prior to the start of any work within the OROW.
- Before fouling the track, regardless of crew size or task.
- Whenever site conditions, track conditions, or crew membership changes.
- Prior to lone worker entry

No work may begin until all participants have been briefed and signed the JSB form.

Briefing Conduct and Leadership

- The Roadway Worker in Charge (RWIC) is responsible for leading the JSB.
- All participants must be physically present for the briefing.

Remote or verbal briefings are prohibited unless a Metro employee is entering under lone worker policy.

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Required Content of Job Safety Briefings

Each JSB must, at a minimum, address:

- Scope of Work – Tasks, location, track numbers, timelines, tools, and equipment.
- Track Status – Tracks under restriction, limits of work zone, and “clear to” locations.
- Operating Clearance – Review of Daily Operating Clearance issued by OCC, including mileposts, speed restrictions, and work limits
- Protection Methods – Flagging coverage, lookouts, barricades, or track outages.
- Communication Protocols – OCC contact methods, radio channels, and flagger signals.
- Pre-Arranged Places of Safety – Locations designated for train passage.
- Environmental and Job Hazards – Weather, ballast conditions, lighting, noise, and OCS proximity.
- Emergency Response – Evacuation routes, egress points, and roles during emergencies.
- PPE and Equipment Check – Verification that all employees have required safety gear
- Certification Check – Verification of current RWP credentials for all attendees.

If track cars are used, the JSB must also verify that a pre-trip inspection was performed.

When multiple roadway work groups are present within the same work area, the Job Safety Briefing must outline the full coordination plan, including the identification of each group’s WIC-qualified representative, the communication flow between those representatives and the RWIC, and the unified protection method covering all groups. All overlapping permits must also be reviewed during the weekly permitting and track allocation meeting, where representatives from each work group discuss overlapping work limits, coordination needs, potential conflicts, and any changes required to maintain on-track safety. Any issues identified during this review must be incorporated into the Job Safety Briefing before work begins.

Worker Acknowledgment

- All workers must sign the JSB form before entering the OROW.
- By signing, each worker affirms that they:
 - Understand the protections in place.
 - Understand their role and assigned tasks.
 - Know where to go in the event of an emergency.
- Workers who refuse or fail to sign may not enter the work zone.

Follow-Up Briefings

Follow-up JSBs are required:

- When a new worker joins the crew.
- When track conditions change (e.g., from single to double tracking).
- When OCC issues instructions that alter the work plan.

Each follow-up briefing must be documented and appended to the original JSB form.

A follow-up Job Safety Briefing is mandatory immediately following any observed violation of on-track safety procedures before work may resume.

Documentation and Recordkeeping

- Completed JSB forms must be retained by the RWIC or a designated safety representative.
- Records must be kept for a minimum of three (3) years.
- Records must be made available for inspection and audit upon request.

RWIC Inaccessibility Protocol

If the designated RWIC becomes unavailable, incapacitated, or loses communication with the OCC, all work must stop immediately. The OCC shall designate a qualified replacement RWIC before work resumes.

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X: LONE WORKER POLICY

Lone worker activities are subject to strict control due to the elevated risk posed by the absence of on-site backup. Metro Transit allows lone work within the Operating Right-of-Way only under limited, pre-authorized conditions as outlined in SOP 103.04 and in compliance with 49 CFR §671.31.

Definition of a Lone Worker

A Lone Worker is a Metro Transit employee who performs work independently in or near the OROW without direct, on-site supervision or the presence of a work crew. (Contractors are prohibited from lone worker work)

Authorization Requirements

Lone workers must hold a current Tier 2 certification and be fully qualified as a Roadway Worker in Charge (RWIC). Authorization for lone work must be obtained through the OCC, documented as foul time or equivalent protection, and verified by a Metro Supervisor or Controller on duty. The lone worker must maintain continuous radio communication with the OCC and confirm active protection before fouling a track.

Permitted Activities

Lone workers may only perform low-risk, short-duration tasks, such as:

- Visual inspections of infrastructure or signage
- Checking equipment condition (e.g., substations, gates, cabinets)
- Documenting graffiti, trash, or stormwater conditions
- The following activities are prohibited during lone work:
 - Use of loud equipment or power tools
 - Climbing ladders or operating lifts

Communication Protocols

Before entering the OROW, the lone worker must:

- Notify OCC of exact location, intended task, and estimated duration
- Confirm two-way radio functionality
- Verify location of nearest Pre-Arranged Place of Safety
- Receive verbal authorization from OCC to begin work

During work:

- Maintain radio contact and respond to OCC check-ins
- Notify OCC immediately of:
 - Completed work and clearance from ROW
 - Any change in task, location, or timeline

Failure to maintain contact with OCC will result in restriction cancellation and alignment removal.

Required Safety Protocols

All standard PPE must be worn

Worker must remain in well-lit, visible areas whenever possible

Worker must not cross multiple track alignments without special authorization

Worker must be aware of emergency egress points and evacuation protocol

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Emergency and Self-Evacuation

If an emergency occurs while working alone, worker must contact OCC immediately using their Metro radio. If injured or unable to communicate, OCC will dispatch Rail Operations, Public Safety, or EMS to the last reported location.

Worker should move to the nearest Place of Safety if possible.

Oversight and Revocation

Metro Safety reserves the right to suspend or revoke lone worker privileges for:

- Noncompliance with MetroLink SOPs or this section
- Communication failures
- Near-miss incidents or hazardous conditions
- Lack of training or expired certification

XI: TRAINING AND CERTIFICATION

MetroLink Roadway Worker Protection (RWP) training is structured in three tiers, with each level granting progressively greater responsibilities within the Operating Right-of-Way (OROW). Training requirements are governed by SOP 101.17 – Work Performed on the MetroLink Right-of-Way, SOP 103.04 – Flag Person Duties, the FTA Roadway Worker Protection Rule (49 CFR Part 671), and Metro Transit safety policy. It also applies to all roadway workers, watchpersons/lookouts, flag persons, OCC personnel overseeing track access, rail transit vehicle operators, roadway maintenance equipment operators, and any personnel responsible for establishing or supervising on-track safety.

Tiered Certification Structure

Tier 1 – Basic Track Access Certification

- Required for: Metro employees, contractors, and visitors entering the OROW under escort.
- Topics Covered:
 - OROW definition, hazards, and safe behavior standards.
 - OCC authority and clearance protocols.
 - PPE requirements.
 - Emergency procedures and self-evacuation.
 - Awareness of flagging procedures and Job Safety Briefings.
- On-the-Job Training (OJT):
 - Tier 1 candidates must complete a supervised OJT component to demonstrate practical readiness.
 - OJT verifies correct PPE use, alignment behavior, and emergency self-evacuation.
 - Certification is not valid until both classroom instruction and OJT are successfully completed.

Tier 2 – Advanced Certification (Flaggers, RWICs, Lookouts)

- Required for: Flag Persons, Lookouts, RWICs, Hi-Rail operators, and LRV operators.
- Topics Covered:
 - Full flagging protocols as defined in SOP 103.04
 - Redundant protections and track fouling rules.
 - Signal flags, Protran devices, radios, and audible warning equipment.
 - Job Safety Briefing leadership and documentation.
 - Hazard recognition, OCC coordination, and emergency communication.
 - Instruction on the Track Access Guide, including interpretation of diagrams, clearance markings, visibility constraints, and environmental hazard indicators.
- Use Case: Protection of crews, establishment of safe work zones, and escort of unqualified personnel.

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- On-the-Job Training (OJT):
 - A Flagger OJT component is mandatory for Tier 2 certification.
 - Candidates must set up a full flagging restriction, use all required flagging equipment, and demonstrate communication with OCC under live field conditions.
 - A worker is not certified as a Flagger until OJT is completed and documented.

Tier 3 – Track Vehicle Operator Certification

- Required for: Hi-Rail operators, LRV operators, and Metro personnel acting as Pilots.
- Topics Covered:
 - Train movement control, shunting, and signal protocols.
 - Radio coordination with OCC.
 - Speed restrictions, clearance rules, and zone entry validation.
 - Safe movement, storage, and positioning of on-track vehicles in work zones.
- Use Case: Hi-Rail inspections, maintenance vehicle operations, and project-specific access.

All RWP training courses include interactive instruction, allowing trainees to ask questions, engage in discussions, and apply field scenarios in a representative setting. Training incorporates demonstrations and practical assessments to verify understanding and proficiency in on-track safety principles.

All RWP training levels, including Tier 1, will train all roadway workers on how to make a Good Faith Safety Challenge, including the right to refuse unsafe work and the process for escalating a concern. Tier 1 will also include instruction on how to report unsafe acts, unsafe conditions, and near misses, and will emphasize that reporting these events is mandatory for all roadway workers. These requirements apply regardless of job title or labor category

Initial and Refresher Training

- Annual recertification is required per SOP 101.17SOP 101.17 signed 2020
- Refresher training is also required if:
 - An RWP violation occurs.
 - New hazards or procedures are introduced.
 - Directed by Metro Safety or OCC following a near-miss event.

Trainer Qualifications

All RWP Trainers must:

- Hold a Tier 2 or Tier 3 certification.
- Be approved by the MetroLink Safety Department.
- Conduct both classroom instruction and practical field evaluations.

Trainers are accountable for certifying only those who demonstrate full procedural compliance and situational awareness.

Competency and Validation

Certification is not complete until a worker has:

- Achieved a minimum score of 90% on a written or LMS-based exam.
- Completed a field evaluation signed by a certified trainer or supervisor.
- Successfully performed required OJT activities for Tier 1 (general access) and Tier 2 (flagging duties).

Flaggers and RWICs must carry valid certification and produce it upon request to OCC, Rail Dispatchers, Rail Transit Service Managers, or Safety.

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Certification Tracking and Retention

- All certifications are logged in MetroLink's Learning Management System (LMS).
- OJT completion and validation must also be documented in LMS.
- Records are retained for three (3) years and are subject to audit by the SSOA or FTA.

Training Materials and Documentation

BSD Safety maintains all RWP training materials, including course slides, lesson plans, field evaluation checklists, and written examinations. These materials are reviewed biennially to ensure alignment with the RWP Manual and Track Access Guide and are available to the SSOA upon request.

XII: EQUIPMENT AND IDENTIFICATION

All personnel entering the MetroLink Operating Right-of-Way must be properly identified and equipped with agency-approved PPE and role-specific tools. These requirements support visibility, hazard protection, and emergency readiness and are strictly enforced under SOP 103.04 and MetroLink RWP protocols.

Required Personal Protective Equipment (PPE)

All individuals entering or working within the OROW must wear the following PPE:

- ANSI Class 2 Safety Vest
- Hard hat
- Safety-toed and ankle supported footwear

Personnel may be removed from the right-of-way if not wearing required PPE.

Credentialing and Visibility Standards

All roadway workers must carry their MetroLink-issued RWP credential, which includes name, Certification Tier (1, 2, or 3), and expiration date

The credential must be:

- Worn or accessible on the person at all times in the ROW
- Presented upon request by Metro Rail Transit Service Managers, Metro Safety, or supervisors
- Personnel without valid certification or expired credentials will be denied access.

Restrictions on Unauthorized Tools and Clothing

To protect the worker and system infrastructure:

- No aluminum ladders are allowed near the Overhead Catenary System (OCS)
- Loose clothing, jewelry, or headphones are prohibited
- No worker may enter the OROW wearing unauthorized PPE or using personal safety gear that does not meet MetroLink specifications
- Supervisors must conduct daily visual checks to ensure all gear is compliant before work begins.

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XIII: RISK-BASED REDUNDANT PROTECTIONS

In accordance with 49 CFR §671.33, Metro Transit requires the implementation of risk-based redundant protections to safeguard all individuals working within the Operating Right-of-Way. These protections go beyond visual awareness or passive systems and involve layered safety controls selected based on the type of work, location, and operational hazards involved.

Overview of Redundant Protection Policy

Metro Transit prohibits the use of single-method protection (e.g., visual detection alone) for any work within the OROW. Instead, all track-related activities must be supported by at least two forms of active safety protection, such as:

- Certified Flagging Protection
- OCC-issued Operating Clearance
- Designated Lookout Personnel
- Speed restrictions coordinated with OCC
- Use of physical barriers, lighting, or audible alerts
- Job Safety Briefing with hazard-specific mitigation

These layers are applied based on a risk classification process described below.

Program Review

BSD Safety maintains the Risk Assessment as a living document. Updates are made following safety audits, field observations, or operational changes. Revisions are reviewed with the OCC, Maintenance of Way, Public Safety, and the SSOA to confirm that identified mitigations remain effective and that redundant protections reflect current conditions.

Use of Physical and Procedural Protections

Metro Transit uses both physical and procedural redundant protections based on the nature of work being performed. Physical protections may include barriers, speed boards, advanced warning devices, ProTran units, and de-energized traction power with OCC verification. These protections can also involve blocking or disabling train routing in the OCC system, locking and lining switches to prevent unintended movements, placing barriers or derails where applicable, removing switch control from normal service, and applying visible barricades or signage that prevent rail vehicles or roadway maintenance machines from entering the work zone. Physical protections are required when maintenance, construction, or track outages call for complete control over rail movement within the defined work limits.

Procedural protections include radio communications, flagging, signage, speed restrictions, and OCC-issued exclusive track occupancy. Work may only proceed when the required redundant protections are in place. For activities requiring traction power to be de-energized, the OCC must confirm power is down and ground straps are applied before work begins

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CATEGORY 1 – Roadway Workers Moving Between Track Zone Locations

Hazard	Potential Consequence	Pre-Mitigation Rating	Mitigations / Redundant Protections	Post-Mitigation Rating	Risk Acceptance
Movement of work crews over long distances greater than one-half mile	Train-to-worker contact while walking along the alignment	2D	Moving crews must include a qualified flag person, the flag person must possess a full flag kit radio and ProTran device, the Operating Clearance must be issued as a moving crew restriction, the Controller polls all trains before authorizing entry, the Controller announces milepost and track limits, trains acknowledge the restriction prior to crew entry	3E	Acceptable
Crew movement without continuous authorization	Struck-by due to loss of train coordination	2D	The flagger must contact OCC every one-half mile for authorization to proceed, movement may only continue once OCC grants permission, the Controller must broadcast the crew location on Channels 1 and 2 each time the crew advances, movement instructions are repeated every one-half mile until cleared	3E	Acceptable
Miscommunication of crew location	Train routing into occupied segment	2C	The Controller tracks crew location milepost-to-milepost, the Controller repeats location updates for all trains, trains remain under the moving crew restriction until the crew clears the alignment, any adjustments to speed board placement require Controller approval	3D	Acceptable with Review

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CATEGORY 2 – Minor Tasks / Visual Inspections

Hazard	Potential Consequence	Pre-Mitigation Rating	Mitigations / Redundant Protections	Post-Mitigation Rating	Risk Acceptance
Minor tasks that involve tools	Train-to-worker contact due to reduced situational awareness	2C	Any minor task involving tools requires a full restriction, an RWIC is required to establish working limits, trains operate under restricted speed or exclusive occupancy based on the task, continuous communication with OCC is	3E	Acceptable
Visual inspections performed without tools	Worker unable to detect trains due to distraction or poor visibility	2D	Visual inspections are permitted only for BSD employees, the inspection must not limit the worker's ability to continuously see or hear approaching trains, trains may pass under restricted speed, the worker maintains full situational awareness	3E	Acceptable
Rapid visual checks	Near-miss or delayed clearance	3C	Visual inspections must be performed without tools, workers maintain an unobstructed ability to monitor train movements, communication with OCC or the responsible supervisor is maintained	4E	Acceptable

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CATEGORY 3 – Non-Visual Inspections and Tasks Requiring Test Equipment

Hazard	Potential Consequence	Pre-Mitigation Rating	Mitigations / Redundant Protections	Post-Mitigation Rating	Risk Acceptance
Use of test equipment reduces awareness of trains	Struck-by due to divided attention	2D	Any task requiring test equipment or measurement devices requires a full restriction with an RWIC, trains operate under restricted speed or exclusive occupancy depending on the activity, supplemental flaggers may be positioned to support sightline coverage, continuous OCC communication is maintained	3E	Acceptable
Electrical hazards near energized OCS	Shock or arc injury	2C	Traction Power verifies energized or de-energized status before work begins, lockout or tagout is applied when required, any equipment or task within 10 feet of energized OCS requires a power-down before work proceeds, TP applies de-energized signage, the RWIC confirms safe status prior to authorizing work	3D	Acceptable with Review
Worker attention diverted by instruments	Delayed clearance or missed warning	2D	RWIC ensures a safe clearance path is maintained during the inspection, trains pass under restricted speed unless exclusive occupancy is required, workers maintain radio communication with the RWIC or OCC for the duration of the task	3E	Acceptable

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CATEGORY 4 – Maintenance, Construction, or Repair Work With Tools or Machinery

Hazard	Potential Consequence	Pre-Mitigation Rating	Mitigations / Redundant Protections	Post-Mitigation Rating	Risk Acceptance
Use of tools or equipment reduces ability to detect trains	Struck-by due to impaired awareness	2C	Work requires a full restriction with an RWIC, trains operate under restricted speed or exclusive occupancy depending on the activity, RWIC maintains position for maximum visibility, communication with OCC is continuous	3E	Acceptable
Equipment fouling or potentially fouling the track	Side-swipe or train-to-equipment collision	2D	The RWIC and flagger monitor equipment position continuously, if equipment fouls or is about to foul the track the RWIC or flagger must immediately notify OCC and stop trains in the field before contact occurs, OCC confirms the hold before work continues, adjacent-track hazards are addressed in the JSB	3E	Acceptable
Work near energized OCS involving equipment	Electrical contact or arc hazard	2C	OCS must be powered down when equipment may come within 10 feet of energized wire, Traction Power verifies de-energization and applies signage, RWIC confirms the electrical safety status before any work begins	3D	Acceptable with Review

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CATEGORY 5 – Lone Worker (Visual / Minor Tasks Only)

Hazard	Potential Consequence	Pre-Mitigation Rating	Mitigations / Redundant Protections	Post-Mitigation Rating	Risk Acceptance
Lone worker has no immediate assistance	Increased exposure to hazards	2D	Worker must be RWIC-qualified, a written JSB with the supervisor is required, 15-minute radio check-ins are maintained, an alert device must be used, trains pass under restricted speed unless exclusive occupancy is required	3E	Acceptable
Lone reliance on sight and hearing	Delayed clearance	2C	Restricted speed applied as needed, TAG reviewed to pre-identify safe areas, escape routes and places of safety are established in the JSB	3E	Acceptable

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CATEGORY 6 – Obstructions / No Clearance Zones

Hazard	Potential Consequence	Pre-Mitigation Rating	Mitigations / Redundant Protections	Post-Mitigation Rating	Risk Acceptance
Obstructions limiting ability to clear the track	Struck-by due to delayed evacuation	2D	RWIC evaluates visibility and geometry onsite, trains pass under restricted speed where required, TAG used to identify known restricted areas, work in No Clearance Zones requires removal of track from service or temporary restrictions for both tracks, OCC may authorize short-duration entry under emergency conditions by stopping trains and maintaining restricted speed	3E	Acceptable
No physical refuge due to track geometry	Worker unable to clear trains	1B	Exclusive occupancy or removal of track from service is required for No Clearance work, trains cannot resume normal operation until OCC confirms workers are clear, trains passing personnel must remain under restricted speed	2E	Acceptable with Review

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CATEGORY 7 – Full Track Outages (Scheduled or Unscheduled)

Hazard	Potential Consequence	Pre-Mitigation Rating	Mitigations / Redundant Protections	Post-Mitigation Rating	Risk Acceptance
Inadvertent routing of trains into an out-of-service track	Collision with workers or equipment	1D	OCC activates SCADA blocking to prevent routing, switches are locked and lined to prevent unintended movements, barriers or derails are placed if applicable, visible out-of-service signage is installed, traction power is de-energized when required and verified by the OCC, exclusive occupancy is established, and the RWIC verifies all outage limits in the field before entry	3E	Acceptable with Review
Worker assumes track is protected when it is not	Near-miss or struck-by	2C	RWIC and OCC confirm and document outage limits before any worker enters the track zone, switches are locked and lined when applicable, protections are reviewed during the Job Safety Briefing, continuous OCC communication is required throughout the work period, daily operating clearances are issued and reviewed by all personnel, and visible protection indicators are verified in the field by the RWIC	3D	Acceptable

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Enforcement and Compliance Monitoring

Failure to establish required redundant protections will result in:

- Immediate suspension of work
- Review by Metro Safety and possible retraining of RWIC or Flagger
- Documentation as a non-compliance finding in field audit reports

SSOA or FTA field observations may request verification of redundant protections at any time.

XIV: GOOD FAITH SAFETY CHALLENGE

Metro Transit encourages and protects the right of any employee or contractor to raise a Good Faith Safety Challenge if they believe a work activity poses a danger to themselves or others. This policy is an essential element of Metro's safety culture and is federally protected under 49 CFR §671.35.

Worker Right to Challenge

Any Metro Transit roadway worker may refuse to proceed with a work activity or enter the Operating Right-of-Way (OROW) if they have a reasonable and genuine belief that:

- Required protections (e.g., flagging, clearance, PPE) are not in place
- Job briefing was incomplete or omitted
- Safety hazards were overlooked or have changed
- Communication with OCC is not functioning
- Any part of the job plan violates MetroLink's SOPs or this RWP Manual

This refusal must be raised immediately to the RWIC or Flag Person and shall not result in discipline or reprisal.

Challenge Resolution Process

When a Good Faith Safety Challenge is raised:

- Pause Work Immediately
- All work must cease until the issue is resolved or the concern is escalated.
- Notify the RWIC or Supervisor
- The RWIC will attempt to address the concern on-site using SOPs and Operating Clearance for reference.
- Escalate to OCC or Metro Safety. If the issue cannot be resolved on-site, OCC must be contacted to involve Metro Safety or Rail Operations leadership.
- Document the Concern.

The worker must complete a Good Faith Safety Challenge Form or submit a digital safety concern report via approved systems.

Documentation and Tracking

The RWIC or Supervisor must document:

- The nature of the concern
- Steps taken to evaluate and resolve the issue
- Whether the work was resumed, modified, or canceled

Completed forms are submitted to the Metro Safety Department and retained for 3 years.

Metro Safety will analyze challenges quarterly to identify systemic trends or training needs.

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Supervisor Responsibilities

- Support the right of any worker to initiate a Good Faith Challenge
- Treat all concerns as legitimate until reviewed
- Ensure no intimidation or retaliation occurs
- Involve Metro Safety promptly if resolution is unclear

Non-Retaliation Policy

Workers who raise a Good Faith Safety Challenge are protected by federal law and Metro Transit policy. Retaliation of any kind—including assignment changes, loss of hours, or intimidation—will be considered a serious policy violation.

Any retaliation claims may be reported directly to:

- Metro Transit Safety Department
- State Safety Oversight Agency (SSOA)
- FTA Transit Worker Safety Reporting System

XV: COMPLIANCE MONITORING

Metro Transit maintains a robust compliance monitoring program to ensure that all elements of the Roadway Worker Protection (RWP) Manual, SOP 103.04, and federal regulations under 49 CFR Part 671 are consistently implemented, verified, and improved.

This section describes how compliance is enforced in the field and how performance is measured internally and externally.

Field Audits and Observations

Metro Safety and designated supervisory staff conduct routine and unannounced field observations across the system to verify:

- Valid RWP certification (Tier 1, 2, or 3) for all personnel in the OROW
- Presence of required PPE and flagging equipment
- Completion and retention of Job Safety Briefings
- Compliance with flagger assignments, post duties, and signaling protocols
- Use of redundant protections (flaggers, lookouts, pre-arranged places of safety)
- Presence and display of valid Operating Clearance documentation

Non-compliant individuals or crews may be removed from the ROW immediately pending investigation.

Digital Tools and Performance Dashboards

Metro Transit utilizes digital platforms such as:

- GoAudits for structured safety inspections and trend tracking
- LMS (Learning Management System) for monitoring training status and recertifications

These systems provide safety, operations, and compliance teams with live visibility into workforce compliance.

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Corrective Actions and Enforcement

Any non-compliance with RWP procedures will result in the issuance of a Corrective Action Plan (CAP), which may include:

- Immediate removal from the ROW
- Mandatory retraining or re-certification
- Temporary suspension of RWP privileges
- Internal investigation and disciplinary follow-up

Metro Safety documents and tracks all CAPs and ensures that violations are addressed in accordance with the agency's Safety Assurance Program.

Quarterly Reporting to the SSOA

Per 49 CFR §671.37, Metro Transit submits quarterly compliance summaries to the State Safety Oversight Agency (SSOA), including:

- Number of RWP field audits performed
- Violations found and actions taken
- Flagging, certification, or job briefing failures
- Trends in Good Faith Safety Challenges or Lone Worker issues
- Training recertification rates and corrective action closure

Reports are compiled and validated by the Safety Department and maintained for at least 3 years.

Annual Executive Safety Briefing

Metro Safety presents a comprehensive Annual RWP Performance Summary to:

- The Accountable Executive
- The Executive Safety & Security Committee (ESSC)
- The BSD Board (as appropriate)

This includes:

- Aggregate RWP audit findings
- Recommendations for SOP or training updates
- Status of risk-based protections system-wide
- Incident correlations and near-miss analysis

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XVI: RECORDKEEPING

Metro Transit maintains comprehensive documentation for all activities, decisions, and personnel actions governed by this Roadway Worker Protection (RWP) Manual. These records support internal enforcement, federal oversight, and continuous improvement of worker safety programs.

All documentation must be stored securely, accessible for audit, and retained according to MetroLink and federal standards.

Required Records

Metro Transit requires the creation and retention of the following RWP records:

- Personnel Records:
- Certification tier and training completion (Tier 1–3)
- Practical evaluations and instructor sign-off forms
- Re-certification dates and LMS status reports
- Suspension, retraining, or revocation notices

Job Documentation:

- Daily Operating Clearances issued by OCC
- Job Safety Briefing logs with worker signatures
- Right-of-Way Work Permits (planned work)
- Emergency access documentation (unplanned, OCC-approved)

Lone Worker Logs:

- Approved lone worker assignments
- OCC entry/exit communications
- Self-evacuation briefing acknowledgment

Safety Concerns and Challenges:

- Good Faith Safety Challenge forms
- CAPs related to challenge investigations or field violations

Retention Requirements

In accordance with 49 CFR §671.43(b):

- All RWP records must be retained for a minimum of three (3) years
- Any records related to a CAP, incident, audit, or safety challenge must be retained until closed and verified by Metro Safety
- Records used in quarterly SSOA reporting are also retained as part of official compliance files

Storage and Access

All RWP-related documents are stored in the following systems:

Physical documents must be scanned within 5 business days of completion and uploaded to their corresponding digital folder.

Access Rights

RWP records must be made available upon request to:

- Federal Transit Administration (FTA)
- State Safety Oversight Agency (SSOA)
- Internal Audit Department
- BSD Safety Department
- External contractors or consultants (if granted access for training or oversight)

Supervisors and RWICs may request read-only access to verify compliance of their assigned teams.