

SECTION 13: RULES COMPLIANCE/PROCEDURES REVIEW

13.0 Overview

The NYCT operating rules and procedures for Department of Subways (DOS) employees are conveyed in the *Rules & Regulations Governing Employees of MTA New York City Transit, Manhattan and Bronx Surface Transit Operating Authority (MaBSTOA) and South Brooklyn Railway* (known as the Rule Book). The rules set forth in this Rule Book apply to all employees. The rule book contains the flagging rules that apply when personnel enter the right of way.

There are currently 31 Safety Policy/Instruction documents issued by the Office of System Safety that outline each department's responsibility, procedures to be followed, training requirements, etc.; which cover a wide variety of safety concerns. All of the divisions within the Department of Subways are responsible for following these procedures. See Appendix I - Safety Policy/Instructions at the end of this section for a list of the Safety Policy/Instructions.

In addition, each operating division develops specialized rulebooks, operating bulletins, advisories, field maintenance procedures, special orders, executive orders, special instructions, standard operating procedures and/or other similar documents, generally referred to as rules and procedures.

The following are the divisional rulebooks:

- Division of Car Equipment (DCE): With the approval of the Office of System Safety (OSS), DCE has developed a document entitled "Safety Rules and Regulations for Car Equipment Employees (Rev. F.)" and these are applicable to DCE employees.
- Rapid Transit Operations (RTO): To supplement the Rule Book, DOS Safety has developed a general information Safety Manual that is distributed to all RTO employees.
- Division of Station Environment & Operations: A divisional safety instruction manual for Station Operations and Maintenance employees has been published. This manual is distributed to all division employees.
- Maintenance of Way (MOW) has developed a MOW Safety Rules and Regulations Book, containing rules that govern MOW work practices. When hired, all supervisory and hourly employees receive safety equipment and a copy of the MOW Safety Rules and Regulations Book. All technical and non-represented employees receive a copy of the MOW Safety Rules and Regulations Book from their manager.
- Staten Island Railway (SIR): The SIR employees are governed by the SIRTOA Book of Operating Rules, SIR Safety Rules, and SIR Roadway Worker Protection Rules and Procedures.

13.1 Review of Rules and Procedures

The Rules & Regulations Governing Employees of MTA New York City Transit, Manhattan and Bronx Surface Transit Operating Authority (MaBSTOA) and South Brooklyn Railway are periodically reviewed for their effectiveness and revised as needed. OSS participates in the periodic review and revision of the Rules. DOS may determine that it is necessary to immediately revise a rule or section of rules at times other than the periodic review. A bulletin would be published explaining which rule(s) are being revised and distributed within the department to advise supervision and the employees of the change.

The Department of Subways Safety Goal Action Plan requires divisional safety rules to be re-evaluated annually to ensure they are up-to-date and reflect safe practices.

The DCE rulebook, “Safety Rules and Regulations for Car Equipment Employees (Rev. F.)”, is reviewed annually and updated as needed by DCE Central Safety Committee, DCE Senior Staff and AAR & Safety Programs.

DOS Safety reviews the RTO Safety Manual’s contents annually, following major operating incidents, following serious injuries on duty to employees and following additions, deletions or amendments to operating rules/tools/equipment.

DOS Safety reviews Stations operational and maintenance Safety Manual contents annually and following major incidents, including serious injuries on duty to employees.

DOS Safety is responsible for updating the rules and procedures when state regulations change, as a result of feedback from supervisors in the field, accident investigations, and subway bulletins. Safety audits are conducted to enforce the rules and observe the effective application of the rules. MOW Safety issues revised changes in rules and procedures pertaining to any work activity, incident or request for clarification from field supervision.

Upon recognizing operating deficiencies either through review or an event that occurs, Subdivision of Signals reviews and revises the rules and procedures and seeks feedback from all Signals managers to provide the best method moving forward. Updated rules and procedures are disseminated through weekly circulation of safety, maintenance and flagging grams and positive compliance directives that are reviewed with each employee and signed by the employee and their supervisor.

The SIR operating and maintenance rules and procedures that are found to be deficient or outdated either through regular review or an event are updated and documented through Operations Bulletins, Supplements or Revisions and Amendments. Supplements are issued as needed, reviewed, discussed and signed for by employees. Bulletins are issued quarterly or as needed and carry permanent rule revisions. They are also signed for by all department employees.

OSS reviews revisions to the Departmental/Divisional Safety Rule books.

13.2 Process for Ensuring Rules Compliance

Within DOS the operating divisions employ different strategies for ensuring compliance with the rules that govern all employees and their divisional rules and procedures. Below are the processes for ensuring rules compliance.

DCE: As documented in the DCE Safety Goals Action Plan, ensuring adherence to safety rules is covered by a process that includes the following:

- (a) Daily facility safety inspections conducted by supervisory employees.
- (b) DCE Central Safety Committee and shop safety committee critique of safety rules and work procedures on a routine basis and in response to specific employee accidents and safety incidents.
- (c) QA audits are conducted semi-annually by the Quality Assurance subdivision to assess the implementation of operating and maintenance rules and procedures by employees and is reported directly to the Chief Mechanical Officer. This includes site inspections conducted by managers, shop safety committee critique of supervisors' implementation of safety rules and work procedures on an ongoing basis and in response to specific employee accidents or safety incidents.
- (d) Update of the Safety Rules and Regulations Booklet for DCE employees.

RTO: Train Service Supervisors (TSS) in RTO monitor the operations of Conductors, Train Operators and Tower Operators by conducting field inspections and visually monitoring employee performance. For Tower Operators, the Dispatchers also perform this function. Managers perform this function for all supervisory titles. Additionally, Department of Subways Safety (DOS Safety) conducts Efficiency Tests designed to ensure compliance with current safety rules.

The following are the Efficiency Test Programs that DOS Safety conducts:

- Door Operation/Platform Observation and Indication Board/Safety Glasses: Conductors will be tested for compliance with New York City Transit Rule Numbers 3.70(m), 9.01(c), 9.01(l), 9.01(r); and all active RTO related to *“Door Operations and Proper Platform Observations”*, *“Acknowledging the Conductor’s Indication Board”* and *“Personal Protective Equipment (PPE) – Safety Glasses.”*
- Train Operations through a Work Area (Flagging): Train Operators will be tested for compliance with NYCT Rule Number 3.82 and current RTO Bulletins regarding *“Train Operation through Work Areas.”*
- Train Operations in Yards: Train Operators will be tested for compliance with NYCT Rule Numbers 2.39(m), 2.39(n), 2.52(g), 2.55(e), 9.02(b) and all RTO Bulletins in effect pertaining to *“Train Operation in Yards”* and *“Incomplete Moves (No Signal in Front of Switch).”*
- Red Automatic Signals: With cooperation from the Division of Electrical Systems, Train Operators will be tested for compliance with NYCT Rule

Numbers 2.40(m), 2.40(n) and all active RTO Bulletins governing “*When Encountering a Red Automatic Signal.*”

- **Distractions:** All train service employees will be tested for compliance with NYCT Rule Numbers 11(e), 9.01(c), 9.02(b) and current RTO Bulletins regarding “*Distractions.*” Observations for compliance will be in effect at all times and will be part of the aforementioned test and recorded during all Efficiency testing.

En route, train crews are subject to unannounced and covert observation by Train Service Supervisors, whose primary function is to ride trains frequently, observing the manner in which Train Operators and Conductors perform their duties, and to correct any improper actions. At terminals between trips, train crews are also subject to observation by terminal supervision, Train Service Supervisors, or Operating Managers. Train Service Supervisors, Train Dispatchers, and Superintendents monitor the operations of Tower Operators by visually inspecting their performance if they share the facility with the Tower Operator. At remote locations, Managers and Supervisors conduct field inspections of Tower Operators’ operations. Train Service Supervisors, Yard Dispatchers, and Yard Superintendents monitor the operations of Yard Tower Operators by visually monitoring yard train movements for safe operations. RTO operating employees are evaluated at least once per pick by Supervision. This information is entered into the Handheld Employee Evaluation Program (HEEP). The DOS Safety unit conducts Efficiency Tests to ensure compliance with current safety rules.

DOS Safety conducts Efficiency Tests that measure performance in specific areas. For the Train Operators, tests include compliance with signal rules and yard operations. For Conductors, tests include compliance with acknowledging proper train stops at the Conductors’ indication board. For all employees, tests include monitoring compliance with Personal Protective Equipment (PPE) rules. Additionally, TSSs evaluate the performance of Train Operators and Conductors twice each pick (four times per year); Dispatchers evaluate the performance of Tower Operators twice each pick (four times per year).

In addition, Train Service Supervisors will perform a minimum of 20 radar checks per line each month and will check each Train Operator brake handle 3 times per year.

Managers regularly conduct random observations of supervisors at work. Formal evaluations of job performance are conducted by management at least once a pick.

STATIONS: The Division of Station Environment & Operations includes a wide range of job descriptions. Therefore, all employees are required to comply with any or all rules pertaining to their current job assignments. Supervisors informally inspect the personnel in their charge during the workday. The supervisor focuses on areas, such as the availability and usage of personal protective equipment, and work procedures of personnel at the work site. Field inspections and safety violations are documented with regard to improper/unsafe work practices. Follow-up inspections are performed to ensure that corrective action has been taken. In the event that corrective action has not been

taken immediately, the employee may be subject to re-instruction or formal disciplinary action.

Managers regularly conduct random observations of supervisors at work. A six month review and a yearly evaluation of job performance are conducted.

MOW: Adherence is assured by daily supervisory oversight and safety audits performed by field supervisors. Supervisors conduct random audits to ensure compliance with safety rules, PPE, quality inspection of work activities and all safety and maintenance related issues. The findings are discussed and if required corrective actions are initiated with the operating supervisor. These reports are distributed within the responsible division for further review. In addition, SMAT (Safety Management Audit Training) audits, and the Joint Safety Task Group submit their findings that are circulated throughout to the area of responsibility of the managers for review and discussion of corrective actions or if requiring additional updating to any policy.

DOS Safety participates in the enforcement of NYCT safety rules through field inspections and documents safety violations with regard to improper and unsafe work practices. The desired results are to ensure employee compliance with New York City Transit policies and an overall accident rate reduction. The inspections concentrate on, but are not limited to, personnel wearing appropriate personal protective equipment and compliance with work procedures and New York City Transit policies. In addition the following audits/inspections are performed: Manager Safety Audit, Log Book Audit (Signals), General Supt. Flagging Audit (Signals), Quarterly Safety Stand down (Infra., Power), Supervisory Daily Activity Log (HVAC) and Manager's Behavioral Audit (TRO).

SIR: Monthly random reviews of employee performance and compliance with all applicable departmental rules and procedures are performed. Department supervisors and managers observe employees performing the selected task for the purpose of auditing compliance with all applicable operating procedures, fitness-for-duty checks, safety procedures, PPE, flagging, maintenance and administrative requirements. Department managers perform field audits of flagging sites, ride passenger trains, perform periodic random inspections of station platforms, station houses, facilities and equipment and perform evaluations of department employees to ensure rules compliance. The SIR Safety Committee consisting of departmental representatives from management and labor conduct additional monthly random inspections and surveys of various SIR facilities, stations and work sites. Completed reports are reviewed for identification of possible trends and occurrences that require updates, revisions or corrective actions. Negative trends are adjusted by issuance of rule revisions. In addition, Safety Culture Observation Team (SCOT) audits and Joint Track Safety Audit (monthly) are performed.

OSS: Independently of DOS, the Office of System Safety performs periodic field safety inspections to monitor compliance with safety rules and Safety Policy/Instructions. Joint inspections with OSS and Transport Workers Union (TWU) representatives are conducted on Subway construction and maintenance projects to identify deficiencies in

flagging, training, and equipment. Quarterly trend analysis of the data is performed. In addition, OSS conducts annual reviews of the DOS System Safety Program Plan and Safety Goal Action Plan. Written reports are sent to the operating department with recommendations and corrective action when required.

13.3 Documentation

The divisional safety units and OSS provide documentation of audits, which includes findings and corrective actions to the management of the unit being audited. Local supervision use various forms and checklists to document their daily auditing of work tasks, inspections of work locations and enforcing the use of personal protective equipment. The DOS Safety Goal Action Plans require managers and supervision to track the status of the implementation of recommendations.

DCE: A Maintenance/Overhaul Shop Audit report is issued, and all nonconformities are documented with corrective/preventive action request. Safety critical findings must be corrected within 24 hours. Audit reports are closed upon verification of implementation of corrective or preventive action plans.

RTO: Efficiency Test results are transmitted to Group and Line General Managers. Field supervisors and managers conduct STOP (Safety Training Observation Program) for Safety and SMAT (Safety Management Audit Training) audits, the results of those audits are transmitted to OSS and trend results are incorporated in the Safety Goal Action Plan.

STATIONS: Observations in the field are noted and transmitted to the Superintendent and General Superintendent of the respective area. Supervision conducts STOP for Safety and SMAT Audits. The results of those audits are transmitted to OSS as required and trend results are incorporated in the Safety Goal Action Plan.

MOW & SIGNALS: Audits are distributed for review throughout the department and discussed by the managers. SMAT audits are conducted monthly and the documented findings and/or corrective actions are also discussed. New rules and policies, which are developed, are distributed in bulletin form, which is required to be displayed in employee quarter facilities.

Reports are generated by the Signals Asset Management conducting SMAT reviews, monthly maintenance outlier audits for ISEIS and perform logbook audits to verify ISEIS entries. These reports are forwarded to the managers in the area involving the report for corrective action. Field managers use a SMAT form to conduct audits and document their findings and corrective actions required.

SIR: Department managers and SIR Safety Committee members use SIR specific forms and check lists for conducting audits and evaluations. Completed forms, reports or

inspection/check lists are reviewed and evaluated during departmental monthly operating staff and safety meetings and monthly SIR Safety Committee meetings and submitted to the department heads for review and to ensure compliance with current rules and procedures and establishing necessary corrective actions as needed.

OSS: OSS prepares and distributes regular safety reports to upper level management in an effort to ensure that they are aware of the safety performance. The regular reports include monthly Employee Lost Time Accident Rate reports, periodic safety performance of NYC Transit and review/inspection reports.

Appendix I - Safety Policy/Instructions

10.1.5	NYCTA Safety Policy	System Safety	02/27/14
10.2.1	Inspection and Testing of New Water Based Fire Protection Systems	System Safety	06/26/13
10.3.3	Building Evacuation Procedures	System Safety	06/26/13
10.4.3	Portable Fire Extinguishers	System Safety/Subways	06/25/13
10.5.2	Fire Department Permits and Certificates	System Safety	10/22/13
10.6.2	Flammable & Combustible Liquids Program	System Safety	03/31/09
10.7.1	Handling, Storage & Transportation of Compressed and Liquefied Petroleum Gases	System Safety	12/31/13
10.9.2	Respiratory Protection Program	System Safety	11/05/01
10.10.1	Hazard Communication	System Safety	11/06/00
10.14.2	Hearing Conservation Program	System Safety	06/05/06
10.15.4	Infection Control Policy	System Safety	10/22/14
10.16.4	Asbestos Management	System Safety	03/09/09
10.17.1	Painting Safety Program	System Safety	10/01/09
10.18.2	Establishing Safety Goals and Action Plans	System Safety	06/29/09
10.19.1	Confined Spaces	System Safety	08/27/97
10.20.2	Lockout/Tagout	System Safety	08/16/13
10.21.1	Personal Protective Equipment	System Safety	02/20/09
10.23.0	Inspection/Test/Maintenance of Existing Water Base Fire Protection System	System Safety	07/03/13
10.26.0	System Safety Analysis	System Safety	12/09/98
10.27.1	Environmental Management	System Safety	04/30/02
10.28.1	Accident Investigation	System Safety	05/03/10
10.29.1	Emergency Exits	System Safety/Subways	06/28/13
10.30.4	Safety Committees	System Safety	08/16/13
10.31.0	Emergency Closure of Stations Facilities	System Safety/Subways	04/14/93
10.32.4	Procedure for Response to NYCTA Rapid Transit Emergencies: In preparation	System Safety/Subways	12/11/09
10.33.1	Lead Particulate Management	System Safety	03/18/14
10.34.2	Inspection, Test & Maintenance of Existing Fire Alarm Systems	System Safety	12/31/13
10.35.0	NYCT Hazardous Materials Team	System Safety/Subways	01/24/06
10.36.0	Powered Industrial Trucks	System Safety	07/14/06
10.37.1	Pandemic Plan	System Safety	12/31/12
10.38.0	Environmental Policy	System Safety	11/13/14