

# Transit Worker Hours of Service and Fatigue Risk Management

*Listening Session*

October 8, 2023

---

**Valerie Beck**

*Division Chief, Safety Assurance and Risk Management*

Office of Transportation Safety and Oversight (TSO)

Federal Transit Administration (FTA)



# Presentation Purpose and Agenda

The purpose of this listening session is to allow interested persons to present comments, views, and relevant research on transit worker hours of service and fatigue risk management programs.

## Presentation Agenda

- Why Transit Worker Fatigue?
- Hours of Service
- Fatigue Risk Management
- Discussion
- Submit Your Comments!



# Why Transit Worker Fatigue?

Studies and medical research indicate that fatigue can negatively affect transportation worker performance, as well as worker health and safety

**97%**

of employers in the transportation industry state that workers feel the impact of fatigue

**66%**

reported decreases in productivity due to fatigue

**45%**

stated they had experienced safety incidents due to fatigue-related issues



# Why Transit Worker Fatigue?



The National Transportation Safety Board (NTSB) has recommended that FTA publish regulations addressing transit worker fatigue since 2004

# Why Transit Worker Fatigue?



## Transit Advisory Committee for Safety (TRACS)

- Transit worker fatigue is a “serious problem”
- Hours of service is a “fundamental, initial pillar of a Safety Management System (SMS) framework and should be implemented by FTA as soon as possible.”



## Existing Federal Regulations

- Federal Motor Carrier Safety Administration
- Federal Railroad Administration
- Federal Aviation Administration
- United States Coast Guard



# Hours of Service

## Goal

To prevent excessively long work hours to lower the risk of fatigue and fatigue-related incidents

## Requirements

Ensure workers have the opportunity to obtain adequate rest by setting parameters such as active work time, time on duty, time off duty between shifts, and maximum number of consecutive workdays.



# Hours of Service

The TRACS hours of service recommendations and the American Public Transportation Association (APTA)'s voluntary, consensus-based train operator hours of service standards

<i>Criteria</i>	TRACS	APTA
<i>Maximum Operating Hours</i>	12 hours	12 hours
<i>Maximum Duty Day</i>	14 hours	16 hours
<i>Minimum Off-Duty</i>	10 hours	10 hours
<i>Maximum On-Duty Period</i>	6 working days	7 working days

# Fatigue Risk Management

Numerous factors contribute to fatigue, such as:

Work  
Schedules

Environmental  
Factors

Circadian  
Rhythms

Effects from  
Task Types

- Fatigue risk management programs complement hours of service requirements by addressing workplace factors that contribute to fatigue
- The Federal Railroad Administration published fatigue risk management regulations in 2022



# Fatigue Risk Management

The American Public Transportation Association (APTA)'s voluntary, consensus-based fatigue management program standards recommend agencies:

- **Establish a steering committee and fatigue management policy** with core program elements
- **Consider fatigue as a line of inquiry** when conducting accident investigations or developing schedules
- **Collect and assess fatigue-related data**



Source: APTA RT-OP-S-23-17 "Fatigue Management Program Requirements" (April 7, 2017)

# Discussion

We would like your feedback on the following focus areas:

## Focus Areas

- A. Current hours of service and fatigue risk management policies in the transit industry
- B. FTA's possible future adoption of Federal hours of service and fatigue risk management requirements for transit workers
- C. Fatigue data collection, including existing practices and best practices

All comments received during the listening session will be summarized and placed in the rulemaking docket for FTA's consideration

# Public Comment

# Submit Your Comments!

## FTA wants your input!

Submit your comments  
to  
[www.regulations.gov](https://www.regulations.gov)  
Docket Number  
**FTA-2023-0018**

- FTA plans to publish an Advance Notice of Proposed Rulemaking (ANPRM) requesting input on specific questions
- Any individual or group may submit comments on part or all of the ANPRM
- Commenters may submit data and research



[TRANSIT.DOT.GOV](https://www.transit.dot.gov)