

## FRA Risk Reduction Program (RRP)

### *Frequently Asked Questions*

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#### GENERAL INFORMATION

##### ***What is the overall objective of the RRP?***

FRA's RRP is an industry-wide initiative designed to improve safety and build strong safety cultures, by developing innovative methods, processes, and technologies to identify and correct safety risk factors using "upstream" predictive data. The RRP will allow better management and use of precursor (predictive) data, beyond the traditional accident and injury data currently used, and will lead to a safety learning culture that allows open disclosure about safety without the fear of adverse consequences. Although traditional rule-based systems have been effective at establishing minimum safety standards, we believe additional safety improvements can be made through safety enhancements such as risk reduction initiatives.

FRA holds a leadership position from which it can encourage the adoption of risk reduction initiatives, without minimizing its safety compliance and oversight role. With the cooperation of senior leaders in railroad industry – FRA, labor organizations, and railroads – we hope to significantly reduce accidents and injuries. FRA's long term objective in undertaking these efforts is to reduce reportable accidents and injuries by 50% within 10 years.

##### ***Why is the RRP important?***

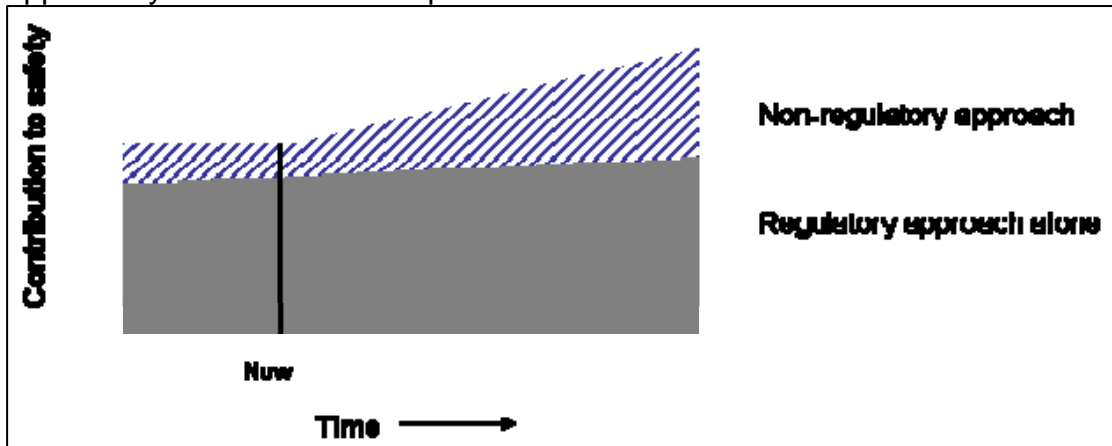
Recognizing indicators of risk *before* an accident happens provides perhaps one of the greatest opportunities for improved safety and performance. In the past decade many different risk management programs have been implemented in various industries, with varying degrees of success. These programs, designed to systematically collect accident precursor data, reduce risk exposure through a corrective action program.

The RRP will provide a way for railroads, FRA, and labor organizations to learn about why unsafe events occur, without fear of blame or punishment. It is intended to provide a way for the railroad and its employees to identify the underlying conditions that contribute to the unsafe events. Depending on the project, it may also provide methods for employees to report events or safety conditions that could have harmful consequences, but didn't, without risk of disciplinary action. When fully implemented, the RRP will identify systemic factors that can address multiple problems, and will identify, track, and evaluate corrective actions, and will make information that was previously hidden from view or unknown available for analysis and problem solving.

## RELATIONSHIP OF RRP TO ENFORCEMENT AND COMPLIANCE

### ***How does RRP relate to the enforcement and compliance roles for the Office of Safety (RRS)?***

FRA compliance efforts have led to recent successes in reducing the numbers of accidents and injuries, and are expected to continue providing a baseline level of safety throughout the industry. Current regulations, safety rules, regulatory compliance, operating rules compliance, and employee disciplinary policies are considered important cornerstones of the overall safety system in the U.S. rail industry. FRA has determined, however, that it could build upon the traditional approach. Non-regulatory risk-based approaches present an opportunity to enhance safety beyond the baseline created by the current process. As the figure below illustrates conceptually, encouraging the adoption of new non-regulatory approaches to supplement regulatory approaches creates the opportunity for accelerated improvement.



### ***Will it be a voluntary or mandatory program?***

The RRP is a voluntary program which will provide for a variety of programs for the industry to pilot and adopt if successful. In January, 2007, the General Accounting Office (GAO) published a report on rail safety, entitled *The Federal Railroad Administration Is Taking Steps to Better Target Its Oversight, but Assessment of Results Is Needed to Determine Impact*. In this report, the GAO recommended against the FRA promoting mandatory risk management approaches, saying that “the agency is currently pursuing various initiatives to reduce train accident rates. In our view, these initiatives need time to mature to demonstrate their effects and, subsequently, an informed assessment would need to be made about whether additional actions are warranted.”

***Does FRA intend to propose regulations related to the RRP? If so, will RSAC be involved?***

Because the RRP is designed to be a voluntary program, new regulations are not being proposed. However, coordination with RSAC will be continuous in order to identify linkages between regulations and the RRP. This question will be revisited as the design and implementation evolve.

***Will a waiver be part of the process, or required?***

The need for a waiver will depend upon the RRP pilot project in question. For example, in the Confidential Close Calls Reporting System, the railroads have requested waivers from specific portions of CFR Part 240. The waiver requests were tailored to the needs of the participating labor organizations so they could report unsafe events and still receive protection from discipline and FRA sanctions. This protection also extended to railroads. However, another pilot program, which involves peer observation and feedback of at-risk behavior, does not involve a waiver request in order for the project to proceed.

***What types of projects are considered?***

Beyond the human factors projects already mentioned, FRA envisions a wide variety of other projects that could fit under the RRP umbrella. Examples include the Collision Hazard Analysis currently in place on some commuter railroads, use of the Track Quality Index for predictive maintenance or capital investment, or use of trending data from hotbox detectors or other sensors. Any innovative use of predictive data could be seen as a potential pilot.

## **RELATIONSHIP OF RRP TO OTHER PROGRAMS AND PILOT PROJECTS**

***How will RRP be managed in FRA?***

RRP, due to the nature of its accident reduction goals and the direct relationship to the overall promotion of rail safety the program, it will be managed through the Office of Safety Analysis which is not directly responsible for safety enforcement activities. It will be supported closely and in partnership with FRA's Office of Railroad Development

***How does RRP compare to the work accomplished by the Switching Operations Fatality Analysis (SOFA) group and the Collision Analysis Working Group (CAWG)?***

The RRP shares two common elements with SOFA and CAWG. Like the RRP, both programs involve industry partnerships between labor, management, and the FRA. They also involve objective data analysis to systematically identify safety risk factors, and recommendations to prevent or mitigate those identified risk factors in the future. RRP is different from SOFA and CAWG in that it seeks information about unsafe events or at-risk behaviors that have not yet resulted in harm to people, equipment or the environment. The RRP uses "upstream" or predictive risk-related data, whereas SOFA and CAWG use past accidents to identify risk. Using information about events that have not resulted in harm

creates a more open and trusting environment in which to learn why unwanted consequences occur. RRP seeks to proactively improve safety by providing a "safe" environment in which to learn from at-risk behaviors, events, and conditions.

***How does RRP relate to other pilot projects, such as the Confidential Close Calls Reporting System (C3RS), Changing At-Risk Behaviors (C.A.B.), and Safety Through Employees Exercising Leadership (S.T.E.E.L.)?***

RRP evolved from pilot programs such as these into an industry-wide initiative to encourage the adoption of proactive risk-based safety initiatives more broadly. C3RS, C.A.B. and S.T.E.E.L. are voluntary pilot programs involving partnerships between labor, management, and the FRA. Each of the pilot projects contains many of the key elements we expect to include in the RRP, such as:

- involvement and commitment from all key stakeholder groups;
- confidential, systematic and objective data gathering, analysis, and reporting;
- employee protection;
- problem solving and corrective actions; and
- long-term sustainability mechanisms.

The RRP effort will combine pilot projects like these into a broader safety program to be developed with support from the industry stakeholders.

***Will RRP be implemented through pilot projects?***

Yes. When the RRP process is more clearly defined and is ready for implementation, FRA will support pilot implementations at selected sites. As the benefits of the process become better documented, it is expected that more interest may grow to expand these pilots and add new ones.

## **CURRENT STATUS OF RRP**

***What is the current status of RRP?***

FRA considers early involvement of key stakeholder groups an important and critical element to designing and implementing a successful safety program that can be sustained for the long term. Several stakeholder involvement strategies are currently being considered while the RRP is still in its design and planning stage. An Executive Steering Committee is established at FRA Headquarters, led by Jo Strang, to provide support and guidance for RRP implementation. An FRA Working Group is also working on implementation issues presently. The FRA Working Group, composed of selected staff from the regions and headquarters, is responsible for the planning and overall design of the RRP, particularly how the RRP process relates to specific roles and responsibilities of FRA personnel.

***Is RRP included in FRA's Federal Railroad Safety Accountability and Improvement Act that Congress is currently reviewing?***

Yes, the RRP is included in this bill.

***How will the RRP identify safety risks that are pertinent to the industry and to individual railroads respectively?***

The purpose of the RRP is to establish successful innovative risk reduction projects at selected pilot sites, and to document measurable outcomes from the programs. It will be up to individual railroads to implement these programs beyond the pilot sites selected, and up to the industry as a whole to implement a specific risk-reduction program industry-wide.

**INVOLVEMENT OF FRA OFFICE OF SAFETY INSPECTORS**

***What does the RRP mean for the FRA Safety Inspector?***

Basic inspection and enforcement responsibilities will not change. FRA will begin engaging key stakeholder groups to help design the program. As a critical stakeholder group, some Office of Safety (RRS) Inspectors, along with Regional management, will be called upon to share their insight and expertise to help in the design, implementation and evaluation of the Program.

Regular inspections will remain the primary focus of Inspector's routine duties. Violations, consistent with the guidance in 49 CFR Part 209 Appendix A; will remain a frequently used tool to achieve compliance. Inspectors will continue to have the same level of access to all the traditional enforcement tools, including Individual Liability actions, Special Notice for Repairs, Compliance Orders and Emergency Orders.

Should you have any questions, issues, or concerns, please contact one of our co-leaders for this effort below who will be able to answer your questions and help you communicate this important program to the industry:

*Miriam Kloeppe*  
*Operations Research Analyst*  
*Office of Safety*  
*202-493-6224*  
[Miriam.kloeppe@dot.gov](mailto:Miriam.kloeppe@dot.gov)

*Michael Coplen*  
*Human Factors Program Manager*  
*Office of Research and Development*  
*202-493-6346*  
[Michael.coplen@dot.gov](mailto:Michael.coplen@dot.gov)