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# Managing Vehicle & Driver Risk

Auto & Light Duty  
DOT & CMV



## Webinar Instructor

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**Risk & Safety Group**

**Industry Expertise:**

- ✓ Oil & Gas Transmission / Distribution
- ✓ Utilities & Municipal
- ✓ Commercial & Residential Contracting
- ✓ Military Installations
- ✓ Fleet Operations
- ✓ Environmental Management





## Learning Outcomes

- Identify the terms and definitions used in managing vehicle and DOT risk.
- Define the elements of an effective, defensible strategy.
- Recognize the impact of the Safety Measurement System and identify methods to measurably improve your Safety Rating.
- Describe MVR reviews, scoring systems and driver qualification methods.
- Define “Negligent Entrustment” and how to cover this risk.
- Identify solutions for technology use – cell phone, telematics, etc.
- Identify methods to manage personal auto risk and personal use of company vehicles
- Determine necessary accountability and disciplinary policies to reduce risk.
- Identify how to analyze and measure your program’s results.

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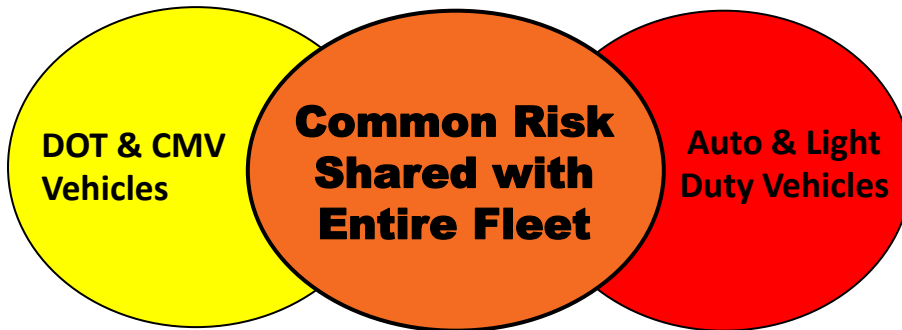
## Boundaries for Today’s Webinar

- **Passenger transportation rules for CMVs and CDLs**
  - Buses, limousines, etc.
- **HAZMAT regulations**
- **Load securement**
- **Comprehensive Hours of Service (HOS) explanations**
- **In-depth Interstate vs. Intrastate rules & comparison**
- **Wacky state rules**



## Common Understanding of Fleet/Vehicle Risk

Regardless of the type of vehicle, many risks are the same and should be managed the same.



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## Auto/Light Duty vs. DOT/CMV

### Auto/Light Duty

- Vehicle GVWR or GCWR less than 10,000 lbs.

### DOT/CMV – for business purposes

- GVWR or GCWR btw. 10,001 and 26,000 lbs.
- CDL's at GVWR or GCWR 26,001 lbs. and greater
- Any vehicle transporting a quantity of HAZMAT requiring placarding

**GVWR** - Gross Vehicle Weight Rating = the value specified by the manufacturer as the maximum allowable loaded weight.

**GCWR** - Gross Combination Weight Rating = the value specified by the manufacturer as the maximum allowable loaded weight of a combination motor vehicle (i.e. truck and trailer)

- In the absence of a value specified by the manufacturer, GCWR will be determined by adding the GVWR of the power unit and the GVWR of the towed unit.

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## Common Elements for Managing All Vehicle and Driver Risk

**Your Fleet Management Controls should include Policies/Expectations for:**

- ✓ CMV/DOT Vehicles
- ✓ Auto/Light-Duty Vehicles
- ✓ or Both.



## Safety Management Controls

- The systems, policy, programs, practices, and procedures used by a motor carrier to ensure compliance with applicable regulations
  - The defined expectations that a motor carrier employs to ensure driver/vehicle/public safety and to reduce the risk of highway accidents and HAZMAT incidents resulting in fatalities, injuries, and property damage.

### **Evaluated by the FMCSA/DOT:**

1. To determine a Motor Carrier's Safety Rating (CMVs), or
2. The degree to which a auto/fleet program provides the necessary precautions to reduce risk and protect employees and the public

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## Program Elements to Manage Risk

- Written policy to define expectations for vehicle use and driver safety
  - **Clear, defined responsibilities of drivers, managers, program administrators**
- Fleet policy acknowledgement form
  - **Each driver certifies their acknowledgement of the defined expectations**
- MVR reviews/analysis, scoring systems and driver qualification
- Driver training and defining specific driving practices
- Use of technology
  - **Telematics, data management, cell phone use, drive cams, etc.**
- Accountability and disciplinary actions
- Personal use of company vehicles & personal vehicle for company use/reimbursement
- Vehicle accident reporting and investigation procedures
- Measuring results and analyzing fleet exposure

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## Do I need to have a written policy to manage my fleet and auto exposure?

- **Answer = No**
  - No Regulations Require a Company to have a Written Policy
- **Question: without a policy, how will you manage your risk and administer an effective Fleet and Auto compliance strategy?**



## Written Policy: Vehicle Use & Driver Safety

- Policy defines expectations and responsibilities
  - **What are the necessary precautions to reduce risk?**
  - **What are you actually going to do?**
- Policy development must be proportionate to the scope of the operation, types of vehicles, regulatory compliance and the specific exposures.
- Only make promises through policy directly translating into the processes that will be setup, maintained and periodically reviewed. Otherwise, the policy becomes a source of liability.
  - **If it's in writing, then it shall be done!**
  - **If not, do not put it in writing.**

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## Accountability & Disciplinary Action

**When Expectations are Not Achieved**  
**Employee Performance Issues**





## Creating a Defensible Strategy

1. Employer establishes a work rule – *i.e. policy*
  - **Defined expectations must meet or exceed all regulations, rules and laws**
2. Work rule is effectively communicated to all affected employees – *i.e. training*
  - **Training must be recorded:** course/topic name, objective-based criteria, training date, names and signatures of participants, name(s) of instructor
3. Employer takes steps to ensure compliance to all work rules.
  - **Performs documented performance evaluations, audits and/or inspections applying directly to a specific person, job, task, etc. as defined by the work rule (policy)**
  - **Document all of the corrections to demonstrate that the issue(s) was resolved**
4. Discipline documented for employee performance issues
  - **When an employee performance issue is discovered, there must be discipline attached to the non-conforming behavior, condition, practice, etc. to support a company's policy and declaration that these performance issues are not tolerated.**
  - **All forms of accountability and discipline must be documented.**
  - **Undocumented disciplinary action never occurred.**

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## Managing the Information You Collect

- What are you doing with all this information?
  - **Are you executing expectations?**
  - **What are you doing about drivers who have poor driving performance or are violating company policy?**
    - Following an accident, speeding, hard braking, "bad" MVR, etc.
- If you don't manage your program according to your defined expectation's, then why is it in writing?
  - **Your program will convict you in a catastrophic loss.**
  - **Not having a policy is not the right choice either**
    - Attorneys will definitely use this against you and to prove lack of control, management incompetence, ignorance, etc.
- If you have a policy, how are you managing expectations and poor performance?
  - **Document all discipline associated with non-conformance to your policies**
  - **Didn't document, didn't do it!**

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## Motor Vehicle Records (MVRs)

Initial, Annual and Periodic Reviews

Scoring Systems

Driver Qualification Methods



## Motor Vehicle Record (MVR)

- A driver's Motor Vehicle Record (MVR) defines past driver behavior and can predict potential future accident exposure.
  - **Who is your MVR vendor? They're not all created equal – you get what you pay for.....you should have a service that monitors MVRs.**
- Non-DOT vs. DOT Drivers
  - **For Non-DOT drivers, a company has the latitude to determine their own driver qualification criteria.**
    - **There is a liability exposure for "weak" qualification criteria.**
  - **DOT establishes specific criteria to qualify or disqualify a driver to operate a company CMV.**
- Frequency of MVR review
  - **Initial upon hire, annual, periodic updates on performance.**

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## Disqualifying a Driver from a Vehicle

- Your fleet program should include parameters to manage driver behavior:
  - How are you evaluating individual driver performance?
    - Do you have a score card or other defined metrics?
  - What are your corrective/disciplinary actions to intervene in a consistent, progressive manner?
    - Warning, temporary suspension, removal, termination
  - Do you have a process to remediate poor driver performance before allowing drivers to earn back their full privilege?
    - Road Test, Evaluation of Skills, Defensive Driver Training, etc.

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## Examples of Evaluating a Driver's MVR

### MVR Grade Assessment Sheet Non-DOT

- Grade I - Green**
- Valid driver's license with no violations reported.
- REQUIRED ACTION:** None
- Grade II - Blue**
- Valid driver's license with one record for a moving violation.
  - Valid driver's license with up to two records for a non-moving violation.
- REQUIRED ACTION:** Manager should provide copy of Fleet Policy to driver. Manager should explain consequences of subsequent violations.
- Grade III - Yellow**
- Valid driver's license with two records for moving violations.
  - Valid driver's license with one at-fault record of accidents.
  - Valid driver's license with three or more records for a non-moving violation.
- REQUIRED ACTION:** Suspension of driving privileges (including vehicle reimbursement program) for a minimum of 60 days. Manager should review policy and provide copy of Fleet Policy to driver. Manager should explain consequences of subsequent violations. Driver must attend company sponsored video or web-based driver safety training and submit documentation of successful completion to the applicable safety manager. Document on Driver Status Sheet.
- Grade IV - Orange**
- Valid driver's license with three or more moving violations or accidents.
  - Valid driver's license that has experienced one record of suspension/revocation.
  - No proof of insurance.
- REQUIRED ACTION:** Suspension of driving privileges for a minimum of 1 year and/or until such time individual has a clean three year driving history. Manager should review policy and give copy to driver. Manager explains consequences of subsequent violations. Driver must attend 8 hour driver safety training at own expense and time, and submit documentation of successful completion to the applicable safety manager. For DWI/DUI and/or refusal/consent to take a blood/alcohol or drug test violation driver must also provide proof of drug and/or alcohol training course to applicable safety manager prior to driving privileges being reinstated. Document on Driver Status Sheet.
- Grade V - Red**
- Current driver's license is suspended or revoked.
  - Valid driver's license with two or more suspension/revocations.
  - Valid driver's license with conviction for DWI/DUI and/or refusal/consent to take a blood/alcohol or drug test.
- REQUIRED ACTION:** All fleet V drivers will have their company driving privileges (including vehicle reimbursement program) suspended for a minimum period of two years. Document on the Driver Status Sheet. To be reinstated after one year suspension - the driver shall at their own expense complete an 8-hour driver safety training course. After, for any DWI/DUI conviction - the driver at their own expense shall complete an alcohol/drug assessment program and training course. Document shall be provided the evidence completion of courses.
- Mandatory Revocation - Not eligible to drive any company vehicle or vehicle reimbursement program**
- Conviction for less than 10 years DWI/DUI in past 10 years.
  - Valid driver's license with a record for vehicular manslaughter.
  - Valid driver's license with a record for a hit-and-run accident.
  - Valid driver's license with an at-fault accident resulting in bodily death.
  - Felony or homicide record using a motor vehicle.

#### NOTES:

For the purposes of this policy, a valid driver's license has no restrictions whatsoever. An invalid license, also synonymous with limited, probationary, restricted, temporary, work permit is not considered a valid driver's license.

Any violation that could result in a classification of Grade III, Grade IV or Grade V must be reported to the company president or safety manager as soon as possible, but no more than before the end of the business day following the day that the employee/driver receives notification.

### MVR Grade Assessment - DOT

#### GRADE I - GREEN

- Only employees with a Valid Driver's License with no violations reported.
- REQUIRED ACTION:** None

#### GRADE II - YELLOW

- Record of any Warrant Found.
- Record of driving the wrong way on a Divided Highway.
- Failure to stop at accident causing property damage.
- Failure to stop at the scene of an accident (Hit & Run).
- Licensed less than 3 years or State does not provide date of issuance.

**REQUIRED ACTION:** Depending on the offense(s), the employee will be disqualified from driving a Commercial Vehicle until after meeting the required suspension period in accordance with the FMCSA. Reference: Regulation 393.51 Driver Disqualifications and Penalties, Subpart D Table 2.

#### GRADE III - RED

- Current Driver's License is Suspended or Revoked.
- One record for DWI/DUI or being under the influence of a controlled substance within the last year.
- Refusing to take an alcohol test as required by state or jurisdiction.
- Record of reckless driving within the past 3 years.
- Record of speeding over 20 mph of the posted speed or the range includes 21 mph or higher speeds within the past 3 years.
- Record of speeding over 100 mph within the past 3 years.
- Record of speed contest within the past 3 years.
- Record of conviction speed in the past 3 years.
- Record of transporting Explosives without special license within the past 3 years.
- Record for evading a police officer causing injury or death in the past 3 years.
- Records of two or more chargeable accidents within the past 3 years.
- Records of three or more moving violations or accidents or combination thereof.
- Drivers under the age of 21.
- Second conviction of leaving the scene of an accident within the past three years.
- Conviction of having an alcohol concentration of .04 or greater while operating a commercial motor vehicle.
- Using the vehicle to commit a felony.
- Causing a fatality through the negligent operation of a commercial vehicle.
- Second conviction of making improper or erratic lane changes within the past three years.
- Second conviction of following the vehicle ahead too closely within the past three years.
- Second conviction of the vehicle ahead too closely within the past three years.
- Second conviction of violations of State or local law relating to motor vehicle traffic controls within the past three years.

**REQUIRED ACTION:** Depending on the offense(s), the employee will not be allowed to drive a Commercial Vehicle until after meeting the required disqualification period in accordance with the FMCSA. Reference: Regulation 393.51 Driver Disqualifications and Penalties Subpart D Table 1.

**NOTIFICATION:** Any violation that could result in a classification of grade II or Grade III must be reported to the INSERT JOB TITLE as soon as possible, but no more than before the end of the business day following the day that the driver of the report receives notification.



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## Negligent Entrustment



### Negligent Entrustment Defined

- The owner of a vehicle may be found liable under the theory of negligent entrustment as a result of an accident caused by another person who was driving the vehicle with either direct or implied permission.



## Negligent Entrustment

### Will Your Program Protect You or Convict You?

- ✓ Fleet Policy
- ✓ MVR's
- ✓ Maintenance Records
- ✓ Inspection Reports
- ✓ GPS / Vehicle Tracking Data

Example: Employee with a History of Speeding has a Significant Accident while Speeding causing Injures to a 3<sup>rd</sup> party(s)

- MVR Shows History of Speeding & Other Violations.
- GPS shows Dozens of Speeding Events.
- Policy states Accountability/Discipline, but You have nothing.

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## Your Liability Exposure

**Your Company can expect Subpoenas for the following in a Catastrophic Auto Loss Event:**

1. **MVRs**
2. **Cell Phone Records**
3. **Inspection & Maintenance Records**
4. **Technology-related Devices**



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## Negligent Entrustment

- ▶ **As a company, you have a responsibility to have a competent and capable person behind the wheel.**
- ▶ **“Selected” Employee needs to have:**
  - Valid license with no restrictions from previous driving infractions (*no permits or occupational license*)
  - History/Pattern of “Acceptable or Good” driving history
  - Necessary health/fitness to operate the vehicle
- ▶ **If an employee cannot meet these requirements, you cannot allow that person to drive a company-related vehicle.**
  - Includes personal auto for company use



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## Proving Negligent Entrustment

The plaintiff attorney will try to show:

- **Owner entrusted the vehicle to the driver**
- **Driver was incompetent, reckless, or unlicensed**
- **Owner knew or should have known that the driver was incompetent, reckless, or unlicensed**
- **MVR shows pattern of poor driving behavior**
- **Driver was negligently operating the vehicle**
- **Driver's negligence was the cause of the plaintiff's injuries and/or damages**

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## Solutions for Technology Use



## Technology

There have been big advancements in vehicle technology to help a contractors manage fleets:

- ✓ GPS vehicle tracking
- ✓ Cell phone & data device controls
- ✓ Telematics – speeding, hard braking, hard accelerations, etc.
- ✓ Vehicle/maintenance performance

### **Three important questions:**

1. What data are you monitoring/capturing?
2. How many have a policy to manage your fleet technology and data?
3. Do you have a disciplinary policy to manage driver behavior?

### **Remember that the data monitored and collected is saved in the cloud:**

- ✓ If you collect information, you need react and manage poor driving behavior.
- ✓ If you don't, this is a Plaintiff Attorneys best friend in a lawsuit – it's all discoverable!
  - Your Information can actually lead to proving negligence and punitive damages

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*If you're not managing all of the available telematics or other technology data, then turn off the features you don't want to manage.*

## Technology Considerations

- **Are employees routinely “overriding” the cell phone while driving company vehicle by stating they are a passenger?**
  - Evidence shows they are using their phone while driving
- **Hard braking may indicate tailgating or following too close**
  - Increased risk of rear-ending accidents
- **Hard cornering may indicate too fast for conditions**
  - Increased risk of side-swipe, lose of control or vehicle roll over
- **Hard acceleration may indicate reckless driving behavior**
  - Increased risk of an accident and unnecessary maintenance costs



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## Drug and Alcohol Testing





## DOT vs. Non-DOT Drug & Alcohol Testing


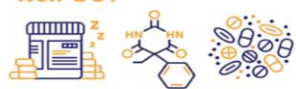
- There are 2 distinct types of testing: DOT & Non-DOT
- One realm applies to industries regulated by the U.S. Department of Transportation (DOT).
  - If you fly a plane, drive a train or CMV, or transport hazardous materials, you likely fall under the rules of the DOT when it comes to drug and alcohol testing.
- A drug or alcohol test given to a worker in an industry that is not DOT regulated is called a Non-DOT test



## Non-DOT Testing is Employers' Choice

- A Non-DOT drug test is essentially whatever the employer decides meets the company's needs and is written in their company drug testing policy.
  - The timing is up to the employer, as well as the type of testing.
    - You could choose to test urine, oral fluid, hair, or a combination of the three after taking into account applicable regulations safety sensitive functions and other legal considerations.

**DOT vs Non-DOT Drug Testing**

DOT	Non-DOT
	
DOT drug screen tests for five drugs: <ul style="list-style-type: none"> <li>• Marijuana</li> <li>• Cocaine</li> <li>• Opiates</li> <li>• Amphetamines /Methamphetamines</li> <li>• PCP</li> </ul>	Same as DOT but also tests the following: <ul style="list-style-type: none"> <li>• Benzodiazepines</li> <li>• Propoxyphene</li> <li>• Barbiturates</li> <li>• Quaaludes</li> <li>• Methadone</li> </ul> Can also include test for hallucinogens, anabolic steroids, prescription painkillers, and ecstasy.

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## Effective Drug & Alcohol Policy

### Purpose Statement:

- This is an explanation of why the company does drug testing. That purpose could be to comply with federal or local laws, meet requirements for a customer, contract or insurance carrier, or simply to maintain safety and productivity in your workplace.

### Coverage:

- Most state drug testing laws require policies to say exactly who is covered. That means spelling out job applicants, full time and/or part time employees or just those in safety-sensitive roles. If you are going to test someone, their role needs to be listed.

### Prohibited Conduct:

- An employer needs to explicitly state that a positive drug test will be viewed as a violation of company policy. Other drug related activity such as possession, sale or use of drugs, as well as trying to cheat a drug test, should be listed as violations as well.

### Types of Tests and When to Test:

- Outline all types of testing you plan to do—whether it is pre-employment, reasonable suspicion, incident, random, return to duty or a combination.

### Consequences:

- Be sure to speak with your legal counsel to develop this section because there are many state laws that can affect what kind of discipline you can use.

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## Defining Specific Driving Practices







## Practical Methods to Reduce Risk

- Use of spotters
- Backing into stalls or pulling through stalls
- Technology solutions
- Driving behavior metrics/measurements company goals and scorecards
- 360 vehicle walk-arounds
- Interactive/simulation based training

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## Analyzing & Measuring Results





## Metrics and Key Performance Indicators

### Basic Data

- **Total number of vehicles by type:**
  - Light, Medium, Heavy or DOT vs Non-DOT
- **Total miles by type of vehicle for a given period of time**
- **Total collisions by employee type:** *new hire, division, area, etc.*
- **Total collisions by type of vehicle for a given period of time**
- **Total injuries by type of vehicle for a given period of time**
- **Type of collisions:**
  - **by cause:** e.g., fail to observe traffic signal, fail to yield, hit-and-run
  - **by crash mechanism:** e.g., sideswipe, head-on, rear-end
  - **by consequence:** e.g., fatality, employee injury, third-party injury, property damage only

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## Fleet & Driver Risk

### Are you really getting better?

#### 2015 - \$192,800 in auto damage claims

**11** – Insurance claims

**7** – Direct expense/No insurance **\$13,685**

#### 2016 - \$23,900 in auto damage claims

**6** – Insurance claims

**22** – Direct expense/No insurance **\$321,972**

### This is Just Funny Math!

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## Leading & Lagging Indicators

### LEADING PERFORMANCE INDICATORS

*Example:* Percentage of drivers classified as “high-risk” drivers in your program

*Example:* Percent reduction: “high-risk” category drivers, “types” of accidents, etc.

*Example:* Percent increase: “types” of accidents, accidents by driver type (new employee, etc.)

*Example:* Percentage of drivers without violations or citations in a calendar year

*Example:* Percentage of drivers completing driver training in a calendar year

*Example:* Percentage of collisions undergoing a “root cause” analysis within 30 days

### LAGGING PERFORMANCE INDICATORS

*Example:* Collisions per Million Miles (CPMM)

$$\text{CPMM} = \frac{\text{Total collisions in a given period of time} \times 1,000,000}{\text{Total number of miles driven during that period}}$$

*Example:* Injuries (employees, public or both) per Million Miles (IPMM)

$$\text{IPMM} = \frac{\text{Total injuries in a given period of time} \times 1,000,000}{\text{Total number of miles driven during that period}}$$

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## Forecasting Collision Repair Costs

- The example below provides guidance on determining the likely cost of repairing collisions.
  - *Note that it excludes costs associated with injuries and fatalities.*
- **Fleet size = 100 vehicles**
- **15% of fleet involved in a non-injury collision/year**
- **Average repair cost = USD \$15,380**

### Annual Collision Repair Cost

$$= 100 \times 0.15 \times \$15,380 = \text{USD } \$230,700$$

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## Managing Auto/Light Duty Risk

Company Vehicles for Personal Use

Personal Autos for Company Use



### Personal Autos for Company Use

**How many pay for some kind financial reimbursement to employees to drive their personal auto for work purposes?**

- ✓ Is there a difference between that vehicle and a company auto during work?
  - **No** - During course and scope of business, that personal auto is essentially your company auto including liability exposure

**Do you have a well defined personal auto policy?**

- ✓ Insurance requirements & limits
- ✓ Define what "work hours" are
- ✓ MVR criteria – What can disqualify a driver?
- ✓ Cell phone & other data device use
- ✓ Alcohol & drug use while driving
- ✓ When will driving privileges be suspended
- ✓ Annual policy acknowledgment form – signed by employee

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## Personal Use of Company Autos

Liability exposure follows the company vehicle wherever and whenever it is used

- **Do you have a policy on personal use of company autos that outlines any limitations on use – distance, time of day, etc.?**
  - Employee acknowledgement form?
- **Do you allow passengers during personal use?**
- **Do you allow employees to tow trailers, boats, etc.?**
- **Do you allow interstate travel?**



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## Managing DOT/CMV Risk





## Commercial Motor Vehicle (CMV)

1. Has a GVWR, GCWR or actual weight (*power unit or combination*) of 10,001 pounds or more, whichever is greater.  
or
  2. Used to transport a quantity of HAZMAT requiring placarding.
- Also, different definition of “Commercial Motor Vehicle” is used for regulating Commercial Driver’s License (CDL) and alcohol/drug testing. This definition **refers to a VEHICLE** used in commerce (*business purposes*), whether interstate or intrastate, that meets one of the following criteria:
    - Has a GVWR of 26,001 or more pounds;
    - Has a GCWR of 26,001 or more pounds inclusive of a towed unit with a gross vehicle weight rating of more than 10,000 pounds;
    - Is designed to transport 16 or more passengers, including the driver; or
    - Is of any size and is used in the transportation of hazardous materials requiring placarding.

**NOTE:** The definition of CMV may vary slightly between states for intrastate safety regulations, so please refer to your state-specific definition of CMV if you are involved in intrastate commerce.

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### Example: Is a CDL Required?

A driver operates a vehicle with 24,500 lbs. GVWR, towing a trailer with 9,500 lbs. GVWR for a GCWR of 34,000 lbs. HAZMAT and passengers are not involved. Is it a CMV and does the driver need a CDL to operate the vehicle?

- YES it is a CMV.
- NO it does not require a CDL.



## Are Pick-ups Considered CMVs?

**Answer = a Definite Maybe...**

• *Is the vehicle used for a business purpose?*

- No – not a CMV
- Yes – GVWR or GCWR will be the determining factor



MFD BY		GVW	3992 KG(8800 LB)
GAWR FRONT	WITH TIRES	RIMS AT	COLD
2359 KG(5200 LB)	LT245/75R16-E	16X7.5	448 KPA(65 PSI)
GAWR REAR	WITH TIRES	RIMS AT	COLD
2760 KG(6084 LB)	LT245/75R16-E	16X7.5	551 KPA(80 PSI)

WEIGHT CARRYING / POIDS PORTANT / CARGA DE PESO	
MAX GROSS TRAILER WT POIDS BRUT MAX. DE LA REMORQUE PESO MAXIMO BRUTO DEL REMOLQUE	5000 Lb. (2268 Kg)
MAX GROSS TONGUE WT POIDS MAX. AU TIMON PESO MAXIMO DE LA MORQUILLA	500 Lb. (227 Kg)

**Vehicle Only**

**= 8,800 lbs. and is Not a CMV**

**Vehicle/Trailer Combination**

**8,800 lbs. + 5,000 lbs. = 13,800 lbs.**

CMV Rules Apply: DOT Number, Fed Med Card, Inspections, etc.



## CMV Guidelines for Vehicles & Drivers

### Basic Requirement Guidelines for Commercial Motor Vehicles and Equipment

Vehicle Requirements	10,001-26,000 GVW/GCVW	26,000+ GVW/GCVW
<b>Vehicle Compliance</b>		
Inspections	✓	✓
Standard Equipment	✓	✓
Repair/Maintenance	✓	✓
Emergency Equipment	✓	✓
<b>Taxation</b>		
IFTA		✓
IRP	*	✓
<b>Permitting</b>		
Hazmat	✓	✓
Placards	✓	✓
Oversize	✓	✓
<b>Accident Compliance</b>	✓	✓

\* IRP registration is optional in this weight range if the vehicle is involved in intrastate commerce.

### Basic Requirement Guidelines for Commercial Motor Vehicle Drivers

Driver Requirements	10,001-26,000 GVW/GCVW	26,000+ GVW/GCVW
<b>Driver Qualifications</b>		
CDL	*	✓
MVR	✓	✓
Pre-Employment Drug/Alcohol Testing	**	✓
Medical Card	✓	✓
Road Evaluation	✓	✓
Violation Accountability	✓	✓
<b>Hours of Service</b>		
Driver Logs	***	✓
<b>Record Keeping</b>	✓	✓
<b>Audits</b>	✓	✓

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## Motor Carrier & Private Motor Carrier

- **Motor Carrier** - term includes a motor carrier's agents, officers and representatives as well as employees responsible for hiring, supervising, training, assigning, or dispatching of drivers and employees concerned with the installation, inspection, and maintenance of motor vehicle equipment and/or accessories.
- **Private Motor Carrier** means a person who provides transportation of property or passengers, by CMV, and is not a for-hire motor carrier.
  - **Most contractors are Private Motor Carriers**
    - Using CMVs for Business Purposes

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## What is SMS?



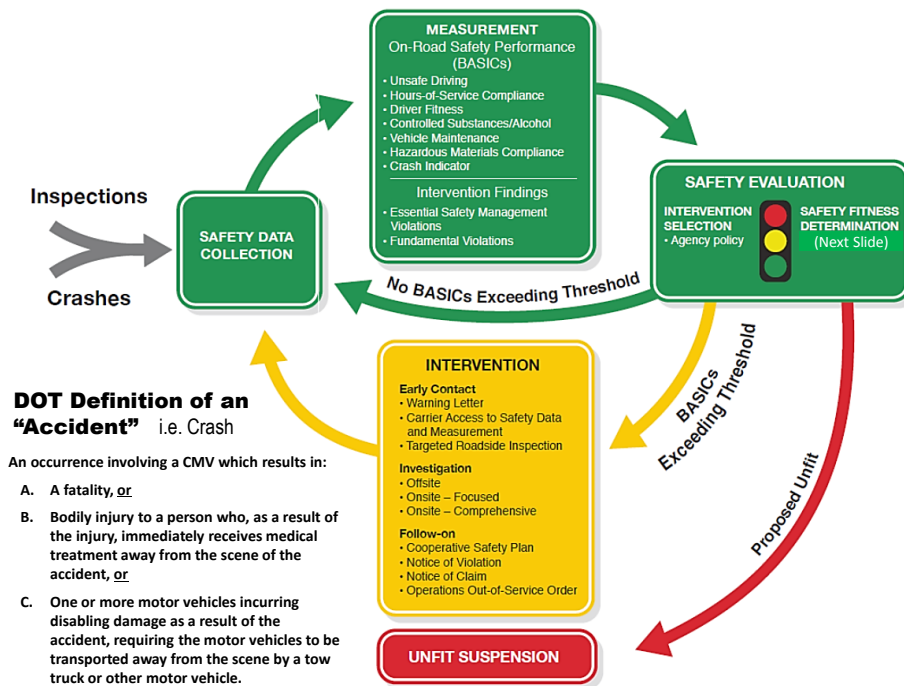
- **7 Behavior Analysis Safety Improvement Categories - BASICS**
  - The BASICS group violations into specific and distinct categories related to unsafe or non-compliant behavior
  - Intervention thresholds are established
  - Motor Carrier BASICS Scores are Based on a 24-month Record
  - BASICS Scores are updated monthly



## What is CSA?



- **CSA is FMCSA's compliance model to improve CMV safety and ultimately reduce large truck and bus crashes, injuries, and fatalities.**
- **CSA enables the FMCSA to identify high risk motor carriers and achieve improved levels of compliance with Federal CMV safety and HAZMAT regulations.**



## 49 CFR 385.5 - Safety Fitness Standard

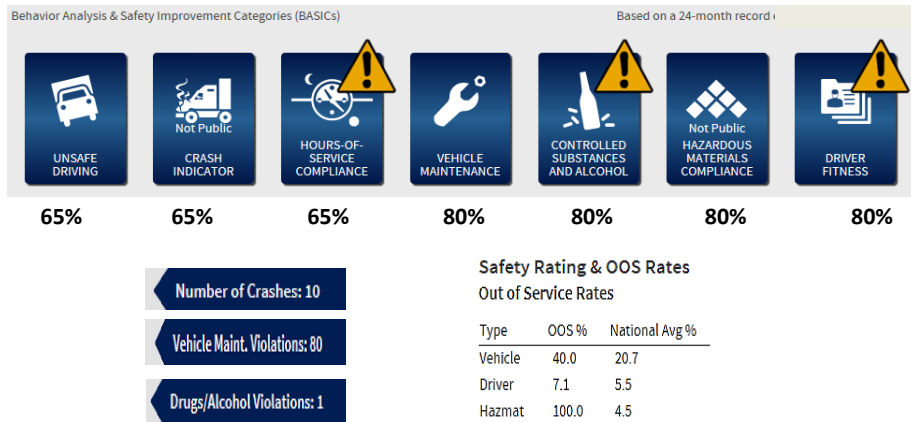
Motor carrier safety rating is based on the degree of compliance with the safety fitness standard. To meet the standard, the motor carrier must demonstrate it has adequate safety management controls in place, which function effectively to ensure acceptable compliance with applicable safety requirements to reduce the risk associated with:

- **Commercial driver's license standard violations** (part 383 of this chapter)
- **Inadequate levels of financial responsibility** (part 387 of this chapter)
- **The use of unqualified drivers** (part 391 of this chapter)
- **Improper use and driving of motor vehicles** (part 392 of this chapter)
- **Unsafe vehicles operating on the highways** (part 393 of this chapter)
- **Failure to maintain accident registers and copies of accident reports** (part 390 this chapter)
- **The use of fatigued drivers** (part 395 of this chapter)
- **Inadequate inspection, repair, and maintenance of vehicles** (part 396 of this chapter)
- **Transportation of hazardous materials, driving and parking rule violations** (part 397 this chapter)
- **Violation of hazardous materials regulations** (parts 170-177 of this title)
- **Motor vehicle accidents and hazardous materials incidents.**



## Your DOT/CMV Risk Foot-Print

### You Can't Hide Your Actions



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## Measurably Improving SMS Scores

- Don't get any violations during roadside or scale inspections**
  - Correctly inspect and properly maintain your vehicles
  - Always request a written copy of the *Driver Vehicle Examination*
- Purposefully seek out roadside and scale inspections to achieve higher numbers of inspections with zero violations**
  - Positive Inspections with No Violations Offset Negative Inspections with Violations, Your Percentages are Reduced
- Challenge all violations in DataQs system – hope for the best!**
- Don't get involved in any DOT accidents**
- Wait 24 months for inspections with violations to drop off**



**Request a  
Printed Copy of  
Each Driver  
Vehicle  
Examination  
Report from the  
Inspecting  
Officer at the  
Completion of  
Every Inspection.**

**The Only Way to  
Confirm that  
Your Inspection  
received **ZERO**  
Violations is to  
Verify that  
"No Violations"  
is Explicitly  
Written in the  
Violations  
Section of the  
Report.**

DRIVER/VEHICLE EXAMINATION REPORT				Aspen 2.13.1.2
Colorado State Patrol Motor Carrier Safety Section 15075 South Golden Road Golden, CO 80401 303-273-1875		Report Number: COHM33001068 Inspection Date: 11/16/2011 Start: 9:35:00 AM MT End: 9:59:10 AM MT Inspection Level: 1 - Full HM Inspection Type: None		
<div style="background-color: black; height: 20px; width: 100%;"></div>				
MC/MX#:	Fax#:	License#:	State:	
State#:		Date of Birth:		
Location: CO 94 AT MP 98	MillPost: 98	Shipper:		
Highway: CO 34	Origin: EMPTY	Bill of Lading:		
County: LARIMER, CO	Destination: EMPTY	Cargo:		
VEHICLE IDENTIFICATION				
<div style="background-color: black; height: 20px; width: 100%;"></div>				
BRAKE ADJUSTMENTS				
Axle #	1	2		
Right	N/A	N/A		
Left	N/A	N/A		
Chassis	UN50	UN50		
<b>VIOLATIONS: No Violations Were Discovered.</b>				
Inspection: No Violations				
Special Checks: No Data for Special Checks.				
State Information:				
Bus (9-15 occupants w/driver): NO		Bus (16+ occupants w/driver): NO		
Van/Enclosed Box: NO		Cargo Tank: NO		
Flatbed/Pickup: YES		Dump Bed: NO		
Concrete Mixer: NO		Auto Transporter: NO		
Garbage/Refuse: NO		Grain, Chips, Gravel: NO		
Pole: NO		Intermodal Container: NO		
Vehicle Towing another Vehicle: NO		Other Cargo Body Type: NO		
No Cargo Body: NO				
If the Inspector placed the vehicle out-of-service, a signature is required below in addition to the carrier officer's signature. I HEREBY CERTIFY THAT ALL VIOLATIONS INDICATED ABOVE HAVE BEEN REPAIRED.				
Failure to return this report with the required certifications can result in penalties up to \$1,000 per day for each day the violation continues, up to a total of \$10,000.				
Signature Of Inspector X:		Signature Of Carrier:		
All defects noted to the Motor Carrier				
Signature Of Motor Carrier:				



## FMCSA Safety and Fitness Electronic Records (SAFER) System

- View non-public information about your company
- Use the DataQs system to challenge violations
- Order company safety profiles
- Pay fines online
- Search FMCSA databases
- Register for a USDOT number
- Access the HAZMAT Route registry
- Obtain National Crash and OOS rates for HAZMAT Permit Registration
- Get printable registration forms and search other FMCSA systems



## Personal Identification Number (PIN) to access Safety & Fitness Electronic Records (SAFER) System

<https://safer.fmcsa.dot.gov/>



"WARNING""WARNING""WARNING"

You are accessing a U.S. Government information system. This information system, including all related equipment, networks, and network devices, is provided for U.S. Government-authorized use only. Unauthorized or improper use of this system is prohibited, and may result in civil and criminal penalties, or administrative disciplinary action. The communications and data stored or transiting this system may be, for any lawful Government purpose, monitored, recorded, and subject to audit or investigation. By using this system, you understand and consent to such terms.

"WARNING""WARNING""WARNING"

WELCOME TO SAFER

The FMCSA Safety and Fitness Electronic Records (SAFER) System offers company safety data and related services to industry and the public over the Internet. Users can search FMCSA databases, register for a USDOT number, pay fines online, order company safety profiles, challenge FMCSA data using the Data2s system, access the Hazardous Material Route registry, obtain National Crash and Out of Service rates for Hazmat Permit Registration, get printable registration forms and find information about other FMCSA Information Systems.

### Notice

The updating of a specific USDOT Number or Docket Number requires the use of a Personal Identification Number (PIN) to access the system.

If your PIN is not known, you may request one be provided by selecting one of the following options:

[Click here to request a USDOT Number PIN be emailed.](#)

[Click here to request a USDOT Number PIN be mailed to the address on file.](#)  
Allow 7 - 10 Business Days to receive a PIN notification letter.

[Click here to request a Docket Number PIN be mailed to the address on file.](#)  
Allow 7 - 10 Business Days to receive a PIN notification letter.  
Note: Docket Number PINs cannot be emailed.



## DataQs to Challenge DOT Violations

Challenge requests are made through the FMCSA portal or directly through the DataQs system – *PIN is required*

- **Make your request as soon as possible while the information is still fresh and after a thorough investigation is complete**
- **Specify the correct "Roadside" event type for the Request for Data Review (RDR) – examples: Crash, Inspections/Violations, Warnings**
- **Provide the accurate inspection number – double check before submitting**
- **Be specific in what you want review, be factual and avoid your opinion(s)**
- **Attach necessary documents and photos that support your request**
  - If you have a leased vehicle, be sure to include the lease agreement.
- **Enter your contact info – verify is accurate and updates**
- **Check the status frequently, as additional info may be requested**

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<https://dataqs.fmcsa.dot.gov/>





## Driver Qualification (DQ) Files

- ☐ Driver's Application For Employment (49 CFR 391.21)
- ☐ Annual Driver's Certification Of Violations (49 CFR 391.27)
- ☐ Inquiry To Previous Employers – 3 Years (49 CFR 391.23(A) (2) & (C))
- ☐ Driver's Road Test Certificate or Equivalent\* (49 CFR 391.31)
- ☐ Inquiry To State Agencies – 3 Years (49 CFR 391.23(A) (1) & (B))
- ☐ Medical Examiner's Certificate\* (49 CFR 391.43)
- ☐ Inquiry To State Agencies – Annual (49 CFR 391.25(A) & (C))
- ☐ Multiple-Employer Drivers (49 CFR 391.63)
- ☐ Annual Review Of Driving Record (49 CFR 391.25)



## Example Road Test Forms

DRIVER ROAD TEST – Evaluation Form			
Driver's Name:		Date:	Location:
Type of License: <input type="checkbox"/> Commercial <input type="checkbox"/> Non-Commercial		If Commercial, What Class of CDL:	
Non-Commercial License Test Vehicle:		CDL Manual Test Vehicle:	
FMCSA Med Card (S) Required for All Road Tests. Does the Driver Have a Med Card? <input type="checkbox"/> Yes <input type="checkbox"/> No (May Not Test) Med Card Expiration Date:			
Driver's Signature:		Evaluator's Signature:	
<b>INSPECTION AND DOCUMENTATION</b>			
1. Driver Demonstrates Review of Previous Day's Post Trip Driver's Vehicle Inspection Report	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
2. Inspection – Engine Compartment	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
3. Inspection – Vehicle Front & Front Axle	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
4. Inspection – Air Brake and Parking Brake Test	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
5. Inspection – Inside Vehicle	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
6. Inspection – Vehicle Sides	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
7. Inspection – Vehicle Rear & Rear Axle(s)	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
8. Inspection – Vehicle Lights & Reflectors	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
9. Inspection – Coupling Device	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
10. Inspection – Trailer Axle(s) & Frame	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
11. Inspection – Trailer	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
12. Inspection – Trailer Lights & Reflectors	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
13. Driver Demonstrates Coupling and Uncoupling of Vehicle and Trailer Combination	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
14. Driver Demonstrates How to Inspect, Set-up & Test a Trailer's Emergency Breakaway System	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
15. Driver Demonstrates Load Securement of Materials and Equipment	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
16. Driver Demonstrates Completion of HOS/DP Driver's Vehicle Inspection Report	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
17. Driver Demonstrates Initial Set-up & Completion of Daily Log Book (For TRACTOR/TRAILER UNITS ONLY)	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
18. Driver Demonstrates Completion of ERO/FA Trip Sheet (If APPLICABLE to DRIVER and STATE)	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
<b>DRIVING SKILLS TEST</b>			
1. Skill Test – Starting	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
2. Skill Test – Emergency Driving	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
3. Skill Test – Parking / Roadside Stop	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
4. Skill Test – Railroad Crossing	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
5. Skill Test – Approaching Vehicle	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
6. Skill Test – Interchange	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
7. Skill Test – Straight Line Backing	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
8. Skill Test – Current Path Backing	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
9. Skill Test – Reverse Driving	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
10. Skill Test – Height & Weight Limits	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
11. Driver Demonstrates Accurate Location and Placement of Emergency Triangles	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
12. Driver Demonstrates Completion of POST-TRIP Driver's Vehicle Inspection Report	<input type="checkbox"/> N/A <input type="checkbox"/> PASS <input type="checkbox"/> FAIL		
Automatic Disqualification: If Yes, List Disqualification: <input type="checkbox"/> YES <input type="checkbox"/> NO			
EVALUATION PASS REQUIREMENT: The Number of Passing Standards Divided By the Total Number of Applicable Standards Must Equal 80% or Greater to Pass Driver Road Test (____ Passing Standards) ÷ (____ Total Applicable Standards) = %			
FINAL EVALUATION OF DRIVER ROAD TEST <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			

DRIVER ROAD TEST – Lowboy Assessment			
Driver's Name:		Date:	Location:
Make and Model of Lowboy:		Evaluator's Signature:	
<b>POWER SUPPLY OPTIONS</b>			
1. Driver Identifies the Power Supply Option of Lowboy – Self Contained, Wet Kit or Combination Wet / Self Contained <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
<b>DETERMINING LOAD LIMITS AND LOAD HEIGHT</b>			
2. Driver Identifies the Load Capacity of the Lowboy with the GVWR and GVWR & Gross Weights / Application of Each <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
3. Driver Can Correctly Calculate Available Cargo Capacity of the Trailer – (GVWR) – (Empty Weight of Trailer) <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
4. Driver Demonstrates How to Accurately Determine Load Height <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
5. Driver Demonstrates How to Verify Any Special Permitted Weight and Weight Compliance Limitations <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
6. Driver Can Evaluate Various CDL Controlling's DOT Permitting Procedures, Driver Acknowledges Understanding of Responsibilities <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
<b>INSPECTION</b>			
AIR LINES	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	FIFTH WHEEL COUPLING	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
ELECTRICAL LINES & CONNECTIONS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	WHEEL END, SEAL & ABLE SEALS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
SPRINKLER SYSTEMS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	HEAD LAMPS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
BRAKE CHAMBERS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	WIND FLAPS / SPLASH GUARDS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
BRAKE DRUM & ROTOR	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	HEAD END PROTECTION	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
COMPLETION TAPES	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	WAB & LOG NOTES	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
BECKING	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	SHOCK ADJUSTERS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
DOT PAPERWORK & ANNUAL INSPECTION	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	SLACK ADJUSTERS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
FRAME	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	SUSPENSION / SPRINGS / MOUNTS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
LIGHTS & REFLECTORS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL	TILES & VALVE STOPS	<input type="checkbox"/> PASS <input type="checkbox"/> FAIL
<b>PREVENTATIVE MAINTENANCE</b>			
7. Trailer and Preventative Maintenance Standards <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
8. Tire Pressure and Thread Depth <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
9. Measuring Brake Stroke on Slack Adjusters <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
<b>OPERATION</b>			
10. Coupling & Uncoupling Trailer from Power Unit <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
11. Engage & Disengage the Power Supply <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
12. Detaching the Trailer Bed <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
13. Outrigger / Extension Bracket Set-up & Operation, Required Dimensional Limit, Manufacturer's Limitations <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
14. Loading & Unloading Equipment <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
15. Load Securement, Determining Load Weight, Load Placement, Number & Position of the Ties <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
16. Attaching the Trailer Bed <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
<b>AUTOMATIC DISQUALIFICATION</b>			
List Automatic Disqualifications: <input type="checkbox"/> YES <input type="checkbox"/> NO			
FINAL ASSESSMENT: Driver May Operate – Model: <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
Type: Self Contained / Detachable <input type="checkbox"/> PASS <input type="checkbox"/> FAIL			
Copy of Operations / Maintenance Manual Received – Driver Initials: _____			
Driver's Name: _____		Driver's Signature: _____ Date: _____	



## Road Test or Equivalent

§ 391.33

- In place of, and as equivalent to, the road test required by § 391.31, a person who seeks to drive a CMV may present, and a motor carrier may accept -
  - (1) A valid Commercial Driver's License as defined in § 383.5 of this subchapter, but not including double/triple trailer or tank vehicle endorsements, which has been issued to him/her to operate specific categories of commercial motor vehicles and which, under the laws of that State, licenses him/her after successful completion of a road test in a commercial motor vehicle of the type motor carrier intends to assign to him/her;
- or
- (2) A copy of a valid certificate of driver's road test issued to him/her pursuant to § 391.31 within the preceding 3 years.
- If a driver presents, and a motor carrier accepts, a license or certificate as equivalent to the road test, the motor carrier shall retain a legible copy of the license or certificate in its files as part of the driver's qualification file.
- A motor carrier may require any person who presents a license or certificate as equivalent to the road test to take a road test or any other test of his/her driving skill as a condition to his/her employment as a driver.

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## Vehicle Inspection & Maintenance Program

### Does your policy cover expectations, specific roles and responsibilities for inspections and maintenance?

- Documented Pre & Post Trip Inspections by the driver(s)
  - What are you doing about identified maintenance issues and OOS items?
- Annual vehicle and trailer inspections performed by certified inspectors
- Operational planning for department objectives and major tasks
- Personnel and training
- Managing all compliance elements of a maintenance program
- Parts management
- Recordkeeping
- Preventative maintenance – established schedules based time, mileage, hours





## Hours of Service (HOS)

## Logging – Paper or ELDs

- ☐ On-duty time versus Off-duty time (§395.2)
- ☐ 10-hour break requirement (§395.3(a)(1))
- ☐ 14-Hour (on duty) Limit (§395.3(a)(2))
- ☐ 11-Hour (driving) Limit (§395.3(a)(3))
- ☐ 60/70-Hour (on duty) Limit (§395.3(a)(3))
- ☐ Minimum 30-minute break within 8 hours of on-duty time (§395.3(b))
- ☐ 34-hour restart (§395.3(c))
- ☐ Record of Duty Status - form and manner requirements for paper and electronic logs (§395.8)
- ☐ 100 and 150 air-mile exceptions to logging (§395.1(e)(1) and §395.1(e)(2))
- ☐ Other Hours of Service exceptions (§395.1 sub-paragraphs (a) through (x))
- ☐ Supporting documents (§395.11)
- ☐ Differences between AOBRDs and ELDs (§395.15 AOBRD and §395.20-38 ELD)



## Administrative Controls

- Hours Driven
- Number of Days
- Mandatory Rest Breaks
- Fatigue Management
- Journey Management



## DOT Audit

- Evaluates a company's safety performance and confirms proper and complete recordkeeping.
- determines if the company has adequate management controls in place to ensure compliance.

### Divided into six inspection categories called “Factors”

- General
- Driver – CDLs, driver qualification, drug and alcohol testing
- Operational – HOS and recordkeeping
- Vehicle – Inspection and maintenance program/files reviewed
- Hazardous Materials
- Accidents



## Items to have Ready of a DOT Audit

- List of current drivers and date of hire
- List of former drivers used in the past 365 days with dates of hire and termination
- Driver qualification files
- Drug & alcohol testing records for CY 2015
  - Chain of Custodies, Results and Bi-annual Statistics
- Driver records of duty status (*logs, time records, etc.*) for past six months
- Driver supporting documents to include trip reports, expense records, fuel, toll, scale receipts, etc. for past six months
- Motor vehicle accident files for past 365 days (DOT reportable accidents)
- List of equipment
  - Company Equipment Number, Year, Make and VIN#, then Designate if Company Vehicle or O-Op.
- Vehicle maintenance records and copies of roadside inspections for past 365 days
- Driver daily vehicle inspection reports for past three months
- Total fleet mileage for last full four quarters



## In Closing...

- Common terms and definitions used in managing vehicle and driver risk.
- Elements of an effective, defensible strategy.
- SMS & CSA and methods to measurably improve your Safety Rating.
- MVR reviews, scoring systems and driver qualification methods.
- Covering the risk of "Negligent Entrustment".
- Identify solutions for technology use – cell phone, telematics, etc.
- Methods to manage personal auto risk and personal use of company vehicles
- Accountability and disciplinary policies
- How to analyze and measure your program's results.



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