

DOT POLICIES & PROCEDURES

HOW THEY CAN REDUCE YOUR RISK IN THE 7 CSA BASICS



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Avoiding the risks related to DOT noncompliance requires the careful preparation of comprehensive policies and procedures. There are three key reasons why:

1. They Help Your Satisfy the FMCSA Regulatory Requirements

Avoiding violations protects your scores under the Compliance, Safety, Accountability (CSA) program, which protects your fleet from being a target for increased inspections or audits.

2. They Simplify the Management of Your Compliance Program

It's impossible to efficiently manage a compliance program without having policies and procedures to guide your decisions.

3. They Safeguard Your Company

Strong policies and procedures ensure that everyone in your organization is aware of the importance of compliance on their safety and the work environment.

In a nutshell, policies establish the guidelines for how motor carriers and their employees should behave in a given situation. Procedures explain how to put those policies into action.

POLICY DEVELOPMENT

When developing DOT policies, the best ones are those that are simple, to the point, provide a measurement mechanism, and have "teeth." An easy way to develop a policy is to use the **ABCDE** method:

A – The **audience** to whom the policy applies.

B – The **behavior**, or action, that you want or require.

C – The **conditions** under which the policy applies.

D – The **discipline** that will be taken if the policy is not complied with (the "teeth").

E – The **exceptions** that might apply.

Remember that you're not explaining every possible situation, you're simply laying down your expectations, what you will and will not allow, and what will happen if the policy is not followed.

The details on how drivers need to comply, what you're going to do to make sure everyone is complying, and all the other details related to the policy, will be in the procedures that back up the policy.

POLICIES, PROCEDURES AND CSA SCORES

The FMCSA's CSA program collects data from your drivers' accidents and safety-related violations found at roadside inspections to track and evaluate your safety performance. The data is divided into seven Behavior Analysis and Safety improvement Categories (BASICs). Every roadside inspection report attributed to your company and your driver — with or without a violation — is factored into your CSA scores for the next 24 or 36 months, respectively.

To make sure that your drivers perform well in the seven BASICs, you need to make sure you have the proper policies and procedures in place to prevent violations in each area.

Listed below are common areas that your policies and procedures should cover within each BASIC.



UNSAFE DRIVING BASIC: PARTS 392 AND 397

The FMCSA views unsafe driving violations as the number one indicator of a carrier's risk of having an accident. Carriers with many unsafe driving violations often have higher accident rates than carriers with few violations in the category.

Do you have policies and procedures related to:	
<input type="checkbox"/> Company speed limit for the drivers	<input type="checkbox"/> Prohibited driving practices
<input type="checkbox"/> Moving violations	<input type="checkbox"/> Log auditing for speeding
<input type="checkbox"/> Reviewing PSPs as part of onboarding	<input type="checkbox"/> Use of electronic equipment while driving
<input type="checkbox"/> Safety Performance History as part of onboarding	<input type="checkbox"/> Inattentive driving
<input type="checkbox"/> Reviewing MVRs	<input type="checkbox"/> Safe driving recognition and incentives
<input type="checkbox"/> Annual reviews	

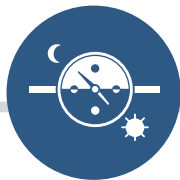


CRASH INDICATOR BASIC

Many times, upon review, good defensive driving may well have prevented an accident — even ones that are deemed the other driver’s fault. In any case, when accident prevention becomes a focus of a carrier, the accident rate typically goes down.

Do you have policies and procedures related to:

<input type="checkbox"/>	Accident filing and tracking	<input type="checkbox"/>	Reviewing driver’s accident record at least annually
<input type="checkbox"/>	Accident review (preventability -contributing factors)	<input type="checkbox"/>	Accident-free recognition and incentives
<input type="checkbox"/>	Accident investigation (on scene - risk assessment)	<input type="checkbox"/>	Progressive disciplinary action
<input type="checkbox"/>	Accident preventability evaluations	<input type="checkbox"/>	Remedial training programs
<input type="checkbox"/>	Reviewing driver’s accident record prior to onboard	<input type="checkbox"/>	Formal fleet safety program



HOURS-OF-SERVICE COMPLIANCE BASIC: PARTS 395 AND 392

This is a compliance area that requires daily, if not hourly, monitoring by both the motor carrier and the drivers to ensure they have enough available time to safely and legally operate a commercial motor vehicle (CMV).

Do you have policies and procedures related to:

<input type="checkbox"/>	Supporting documents	<input type="checkbox"/>	Operating ill or fatigued
<input type="checkbox"/>	Log auditing	<input type="checkbox"/>	Personal conveyance
<input type="checkbox"/>	General HOS limits and recording	<input type="checkbox"/>	Off-highway (yard movements)
<input type="checkbox"/>	Electronic logging	<input type="checkbox"/>	Roadside inspections
<input type="checkbox"/>	Adverse driving - emergencies	<input type="checkbox"/>	Log falsification
<input type="checkbox"/>	Short-haul	<input type="checkbox"/>	Driver availability/productivity
<input type="checkbox"/>	Acceptable HOS exceptions/rule sets	<input type="checkbox"/>	Customer delays

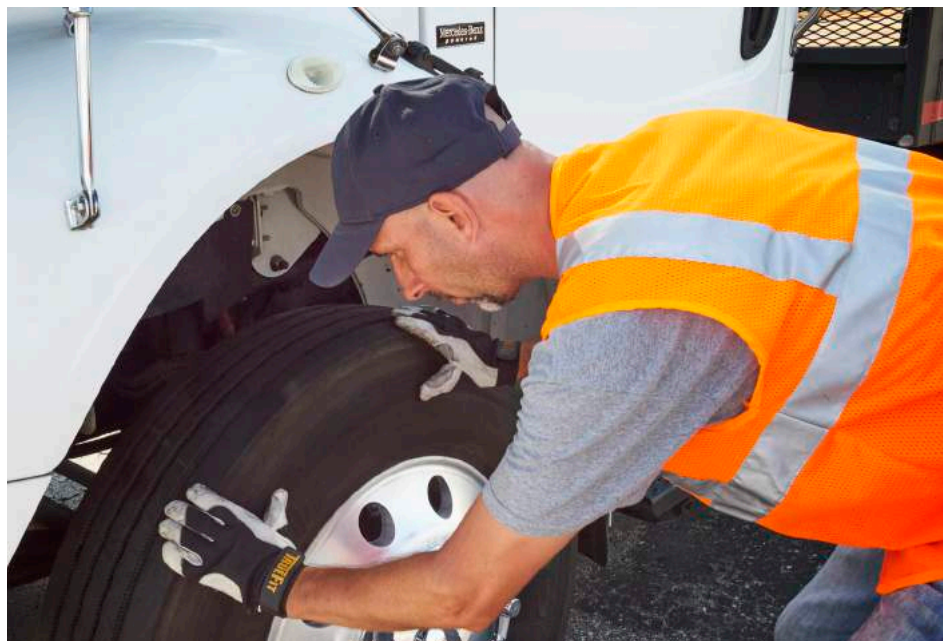


VEHICLE MAINTENANCE BASIC: PARTS 393, 396, AND APPENDIX A TO PART 396

With over 60% of violations issued at roadside inspections due to this one category, it would be wise for you to examine your fleet's vehicle maintenance and inspection policies and procedures.

Do you have policies and procedures related to:

<input type="checkbox"/> Pre-trip inspections	<input type="checkbox"/> Preventative maintenance
<input type="checkbox"/> Post-trip inspections	<input type="checkbox"/> Over-the-road breakdowns
<input type="checkbox"/> Enroute inspections	<input type="checkbox"/> Cargo securement
<input type="checkbox"/> Roadside inspections	<input type="checkbox"/> Maintenance records
<input type="checkbox"/> Annual/periodic inspections	<input type="checkbox"/> Roadside inspection vehicle out-of-service order
<input type="checkbox"/> Emergency equipment inspections	<input type="checkbox"/> Vehicle bad order tags
<input type="checkbox"/> Driver vehicle inspection report (DVIR)	





CONTROLLED SUBSTANCES & ALCOHOL BASIC: PARTS 382 AND 392

“Failing to implement an alcohol and/or drug testing program” consistently ranks as the top acute violation cited by the Federal Motor Carrier Safety Administration (FMCSA) during investigations. And no other BASIC comes close to the out-of-service rate of nearly 100%.

Do you have policies and procedures related to:

<input type="checkbox"/>	Pre-employment controlled substance testing	<input type="checkbox"/>	Refusal to submit to a required alcohol or controlled substances test
<input type="checkbox"/>	Pre-employment and annual queries of the Clearinghouse	<input type="checkbox"/>	Handling of test results, record retention, and confidentiality
<input type="checkbox"/>	DOT drug and alcohol history from previous employers	<input type="checkbox"/>	Reporting of results in a management information system
<input type="checkbox"/>	Random testing	<input type="checkbox"/>	Reporting violations under Part 382 to the Clearinghouse
<input type="checkbox"/>	Post-accident testing	<input type="checkbox"/>	Reporting negative return-to-duty tests to the Clearinghouse
<input type="checkbox"/>	Reasonable suspicion testing	<input type="checkbox"/>	Reporting completed follow-up testing to the Clearinghouse
<input type="checkbox"/>	Return-to-duty testing	<input type="checkbox"/>	Removal from safety related function
<input type="checkbox"/>	Follow-up testing	<input type="checkbox"/>	Progressive discipline
<input type="checkbox"/>	Testing procedures	<input type="checkbox"/>	Non-CDL drivers obligations under Part 392
<input type="checkbox"/>	Prohibitive use		





HAZARDOUS MATERIALS (HM) COMPLIANCE BASIC: PARTS 171-173, 177-180 AND 397

Year after year, the top hazardous materials roadside inspection violations include inadequate cargo securement of hazardous materials packages; damaged, deteriorated, or obscured placards; missing shipping papers; and vehicle placarding issues. Taking an objective look at your policies and procedures in this BASIC gives you the necessary information to find the root cause(s) of violations.

Do you have policies and procedures related to:

<input type="checkbox"/>	Registration with FMCSA and PHMSA as a hazardous material carrier	<input type="checkbox"/>	Cargo tank inspection and testing
<input type="checkbox"/>	Security plan	<input type="checkbox"/>	Package labeling and marking
<input type="checkbox"/>	Incident and accident risk mitigation and reporting	<input type="checkbox"/>	Hazardous materials plan (General)
<input type="checkbox"/>	Spill/release prevention and procedures	<input type="checkbox"/>	Hazmat employee training
<input type="checkbox"/>	Shipping documents	<input type="checkbox"/>	Loading procedures
<input type="checkbox"/>	Vehicle placarding	<input type="checkbox"/>	Loading segregation
<input type="checkbox"/>	Vehicle washout/cleanout	<input type="checkbox"/>	Enroute inspections



DRIVER FITNESS BASIC: PARTS 391 AND 383

While having the lowest relationship to crash risk, approximately 33% of the Driver Fitness violations result in an OOS. What's worse, there's often no "fixing it" at the roadside, so you have to recover the vehicle and driver. In addition, due to the long retention periods of driver qualification, it's an area that is thoroughly reviewed during a DOT audit.

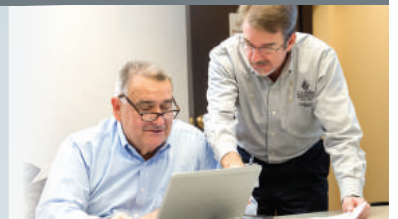
Do you have policies and procedures related to:

<input type="checkbox"/>	Creation of new driver qualification files - DQ file checklists	<input type="checkbox"/>	Driver license requirements (CDL/endorsements/restrictions)
<input type="checkbox"/>	Driver Investigation History (DIH) discovery and review	<input type="checkbox"/>	Driver disqualifications
<input type="checkbox"/>	Contents of driver files (periodic review)	<input type="checkbox"/>	Obtaining MVRs and PSPs
<input type="checkbox"/>	Accessibility and security of driver's data	<input type="checkbox"/>	Driver road tests
<input type="checkbox"/>	Annual driver safety review	<input type="checkbox"/>	Driver medical certification
<input type="checkbox"/>	Written examination and certificate	<input type="checkbox"/>	Driver submission of violations, citations, suspension, or revocation
<input type="checkbox"/>	Driver training		

BE PROACTIVE ABOUT POLICIES & PROCEDURES

When you're proactive with your fleet's DOT policies and procedures, you have considerable control over your CSA scores. And in the words of Benjamin Franklin, "an ounce of prevention is worth a pound of cure."

IMPROVE DOT COMPLIANCE with a CUSTOMIZED PROGRAM



J. J. Keller's **DOT Compliance & Safety Program Management** gives you a J. J. Keller® Consultant working with you at your facilities to build and implement a DOT compliance program based on your unique risks.

Through this comprehensive service, **our Consultants will review (or create) your DOT policies and procedures to ensure compliance.** And then we'll help you implement your policies and procedures, measuring their effectiveness on an ongoing basis.



THIS CONSULTING SERVICE ALSO INCLUDES:

- Ongoing onsite assessments
- Custom compliance plan
- Comprehensive audit protection
- Unlimited regulatory support via phone & email

And you get all of this at a predictable monthly expense with no hidden fees. It's the industry's most in-depth approach for reducing risk!

Contact us today to get started.

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