

Transportation Safety

Training ADVISOR

February 2025

City driving

A different set of challenges

DOT final rule ties up loose
ends in saliva drug testing

Thousands of CDL drivers
to face sober reality of DOT
testing violations

Information and resources to help your drivers operate safely



J. J. Keller
& Associates, Inc.
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MESSAGE FROM THE EDITOR

Round and round you go!

As cities around the country continue to install roundabouts, drivers must know how to navigate them safely. Consider including safety tips for roundabouts in your regular driver training.

The approach

When approaching a roundabout, tell your drivers to slow down and watch for signs to assist in selecting the appropriate lane. Drivers must yield to pedestrians and bicyclists, as well as to traffic on the left that is already in the roundabout.

Entering and exiting

When there is a safe gap in traffic, instruct drivers to enter the roundabout and maintain a slow speed. When approaching the exit, drivers must turn on the vehicle's right signal. Drivers must yield to pedestrians and bicycles when exiting.

Trailer tracking

When navigating a roundabout, there will be times that the trailer may track into other lanes, using all available space or the truck apron. A truck apron is paved area on the inside of the roundabout that is used by trucks when off-tracking.

Turning right

When making a right turn, the vehicle may need more space than is provided in the lane of travel, and in some cases the vehicle may need all available space. Make sure drivers continually check mirrors, are alert to surrounding traffic, and proceed with caution.

Turning left

When making a left turn, drivers must check for surrounding traffic, keeping in mind that the trailer may off-track onto the truck apron. Drivers should continually check their mirrors until the truck clears the roundabout.

Going straight

When making a through movement, drivers must choose the correct lane, scan for surrounding traffic, and continually check the mirrors until the vehicle has safely cleared the roundabout. ♦



Lucero Truszkowski

Lucero Truszkowski joined J. J. Keller & Associates, Inc. as an Associate Editor in 2022. Lucero edits, writes, and researches content on a variety of topics, including transportation, human resources, and driver training. She holds a Master of Science (MS) in Professional Writing from New York University.



TRAINING BLUEPRINT — CITY DRIVING

A different set of challenges

City driving requires a driver's undivided attention. Heavy traffic, narrow streets, and obstructed views are just some of the challenges the professional driver faces when operating in the city.

Professional drivers must be alert to the challenges and potential dangers associated with city driving.

TIP: Use a video to introduce this topic, choosing one that considers your drivers' experiences, the type(s) of vehicles they operate, and the types of situations they regularly deal with.

When's my turn?

A large vehicle in a tight space doesn't make for an easy turn. Good judgment, proper speed and space control, and accurate steering are all important elements of executing a safe turn.

Keep these eight steps in mind when making tight turns:

1. Signal at least 100 feet before the turn to let others know your intentions.
2. When approaching an intersection, adjust the vehicle's speed.
 - Remember, the sharper the turn, the slower the vehicle should be moving.
3. Shift into the correct gear before the turn and complete the turn in the same gear.
4. When making a right turn, pull into the intersection *before* beginning the turn.
 - Get about half of the rig past the corner. This will help account for off-tracking and help prevent hitting the curb or a fixed object, such as a street sign.
5. Once the vehicle has reached that point, turn the steering wheel to the right.
 - Accelerate slightly to smooth out the turn.
6. During the turn, continue to scan the road ahead and to the sides. Watch the vehicle's right mirror for the position of the trailer's wheels.
 - Watch for vehicles that may have moved between the curb and the rig from the time the maneuver started.
7. Immediately after the turn is complete, turn the steering wheel back to straighten out the wheels.
8. When executing a left turn, turn from as far right as possible to allow plenty of room for the tractor.
 - Watch the vehicle's left mirror before, during, and after the turn.

Intersection junction

Crossing an intersection with a long vehicle can be a tough job. The driver must consider the vehicle's additional length and slower acceleration (compared to a personal vehicle) when making the choice to cross an intersection.

The driver should always stop at an intersection or unmarked crossing and always assume the truck doesn't have the right of way. After stopping, drivers should proceed slowly. This allows time to stop again, look to the left, then the right, and then the left again before pulling into the intersection.

The approach at a controlled intersection is very similar. The driver should stop two times: first, at the stop sign or light, and second, after easing forward to a point when oncoming traffic is clearly visible.

TIP: Stress the importance of scanning and being alert.

GPS use

When driving in an unfamiliar city, a global positioning system (GPS) can be helpful in finding a destination, if drivers use the right type of device.

The key to remember is that all GPSs don't perform the same tasks. A general GPS is intended for personal vehicle use, but not for commercial vehicle use. Professional drivers need devices designed for their specific driving needs.

A GPS designed for the professional driver includes information addressing truck routes, low overpasses, and axle limits. All relevant information should be entered into the GPS prior to the driver beginning the trip. This includes vehicle length, width, height; axle weights; and hazardous materials being transported (if applicable).

The driver should follow the route recommended by the GPS but not be totally dependent on the directions provided. Drivers must pay attention to and obey traffic signs and advisories (such as a low bridge overpass or weight limitations), as sometimes conditions change and the GPS may not include the most current information. ♦

TIP: Review the laws for the states your drivers travel in/through/from to check which laws, if any, address technology use while driving.



TRAINING HANDOUT — CITY DRIVING

In defense of road safety

Defensive driving is extremely important when it comes to operating a commercial (or any!) vehicle in an urban area.

Defensive driving includes:

- Observing the entire situation,
- Watching for changes,
- Recognizing potential hazards,
- Planning for the appropriate response, and
- Correctly executing the plan when needed.



When driving in a city, drivers should:

- Stay on posted routes;
- Manage speed and space, allowing plenty of room to maneuver;
- Be alert at all times;
- Never focus on one object or event;
- Continually scan a block or two ahead;
- Regularly check the vehicle's mirrors;
- Be aware of traffic signals;
- Stop at crosswalks when applicable;
- Watch for signs; and
- Watch for bicycles and pedestrians. ♦



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TEST YOUR KNOWLEDGE — CITY DRIVING

1. Drivers should speed up in turns to get through the maneuver more quickly and safely.
 - A. True
 - B. False

2. When approaching an intersection, drivers should:
 - A. Slow down and roll through the intersection
 - B. Honk the truck's horn to warn others that they're coming
 - C. Stop and check both directions before proceeding
 - D. Both A and B

3. The sharper the turn, the slower the vehicle should be moving.
 - A. True
 - B. False

4. When using a GPS designed for professional drivers, the device should have the following information entered into it:
 - A. Vehicle length, width, and height
 - B. Axle weights
 - C. Hazardous materials being transported
 - D. All of the above

5. Drivers must yield the right of way to pedestrians when turning on green.
 - A. True
 - B. False ♦

NAME: _____ DATE: _____

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DOT final rule ties up loose ends in saliva drug testing

Corrections have been made to address multiple issues with the Department of Transportation's (DOT's) May 2023 saliva drug testing rule. A final rule published on November 11, 2024, and effective December 5, 2024, corrected deficiencies in the original rulemaking by:

- Providing temporary qualification requirements for mock oral fluid monitors,
- Identifying which individuals may be present during an oral fluid collection, and
- Clarifying how collectors should document sufficient volumes of oral fluid.

Earlier this year, DOT published these same changes as a Direct Final Rule, but it was rescinded before its effective date due to adverse comments. As a result, DOT went through the rulemaking process — a published proposal, comment period, and final rule.



A training impossibility corrected

The original saliva drug testing rule attempted to mirror the existing urine collector qualifications. Collectors were subject to basic information, qualification training, initial proficiency demonstration, refresher training, and error correction training.

However, the proficiency demonstration with mock collections was supposed to be monitored by a qualified collector who performed saliva drug test collections for at least a year. This requirement created an impossibility.

Section 40.35 was amended to authorize individuals to monitor mock oral fluid collections without meeting the requirement of being a qualified oral fluid collector. To ensure the proficiency of the collection monitor, DOT expects those individuals to have a thorough understanding of Part 40 and to be well-versed in the course content they are teaching. This exception remains

in place for one year after Health and Human Services (HHS) first certifies a lab, or until otherwise specified.

Collection procedures fine-tuned

Two changes were made to 40.73 collection procedures. Both offered additional clarification to collectors.

One change corrected an inadvertent omission in the original rulemaking to parallel saliva drug testing with alcohol testing procedures for privacy. The new rule provides explicit instructions to collectors that they must not allow any person other than themselves, the employee, or a DOT agency representative to witness the testing process.

The other revision details instructions to collectors on how to document sufficient specimen volumes. They are told to check the "Volume Indicator(s) Observed" box in Step 2 of the federal chain of custody form after the employee provides a sufficient specimen to indicate that they observed the volume indicator(s) during the collection.

One step closer to implementation

This final rule opens the door to collector training as of December 5, 2024, since the Food and Drug Administration (FDA) has approved one saliva drug testing device.

In addition, labs can begin the HHS certification process to analyze saliva specimens collected using the approved device. The certification process takes several months.

DOT employers who want to use saliva drug testing can use this interim to:

- Confirm that their collection site will offer the testing method and have trained collectors,
- Contract with an HHS certified lab as they become available,
- Update policies, and
- Train employees subject to and those managing DOT testing. ♦

Thousands of CDL drivers to face sober reality of DOT testing violations

Approximately 179,000 drivers were due to lose their commercial driver's license (CDL) as the Clearinghouse-II final rule was implemented beginning November 18, 2024.

The rule requires state driver licensing agencies (SDLAs) to remove the commercial driving privileges of anyone in a prohibited status in the CDL Drug and Alcohol Clearinghouse.



A prohibited status is placed on a driver's Clearinghouse record as the result of a Department of Transportation (DOT) drug or alcohol violation under 49 CFR Part 382. The driver remains in the status until the system receives record

of the substance abuse professional (SAP) evaluations, successful education and/or treatment, and a negative return-to-duty test.

FMCSA's instructions to SDLAs

SDLAs have been directed in Clearinghouse-II by the Federal Motor Carrier Safety Administration (FMCSA) to take the following actions when a driver is found to be in a prohibited status in the Clearinghouse:

- Deny CDL and commercial learner's permit (CLP) issuance, renewal, upgrade, or transfer for any driver that has an unresolved violation (prohibited status) in the Clearinghouse.
- Downgrade existing CDL and CLP holders while they are in prohibited status in the Clearinghouse.
- Report the downgrade within 60 days of learning of the status.
- Reinstate privileges after learning that the driver is no longer prohibited.

FMCSA's regulations don't dictate administrative processes for the SDLA to reinstate CDL privileges. Motor carriers and drivers should speak with their SDLA to learn how a driver should provide documentation to reclaim their license. ♦

Expert Help: Question of the Month

Question: Is it mandatory to send all of our employees through a defensive driving class? I can't find any regulations that require this — can we just use online driving training instead? Our organization is "self-insured" for vehicle insurance.

Answer: Instruction on defensive driving isn't specifically required under the Federal Motor Carrier Safety Regulations (FMCSRs).

Section 390.3(e) of the FMCSRs states that drivers and employees must be instructed in and comply with the regulations, but it doesn't include specifics as to topics, delivery, documentation, or time.

As for your insurer's requirements, you will need to consult with your insurer on what types of courses may be required, as well as what training providers may or may not be accepted as part of the policy. ♦



Expert Help

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Next Month's Topic: Customer service

For many of your company's customers, your driver is the only representative that has a face-to-face relationship with actual people. Because of this, your driver's conduct, attitude, appearance, and attention to customer service all play an important role. ♦

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