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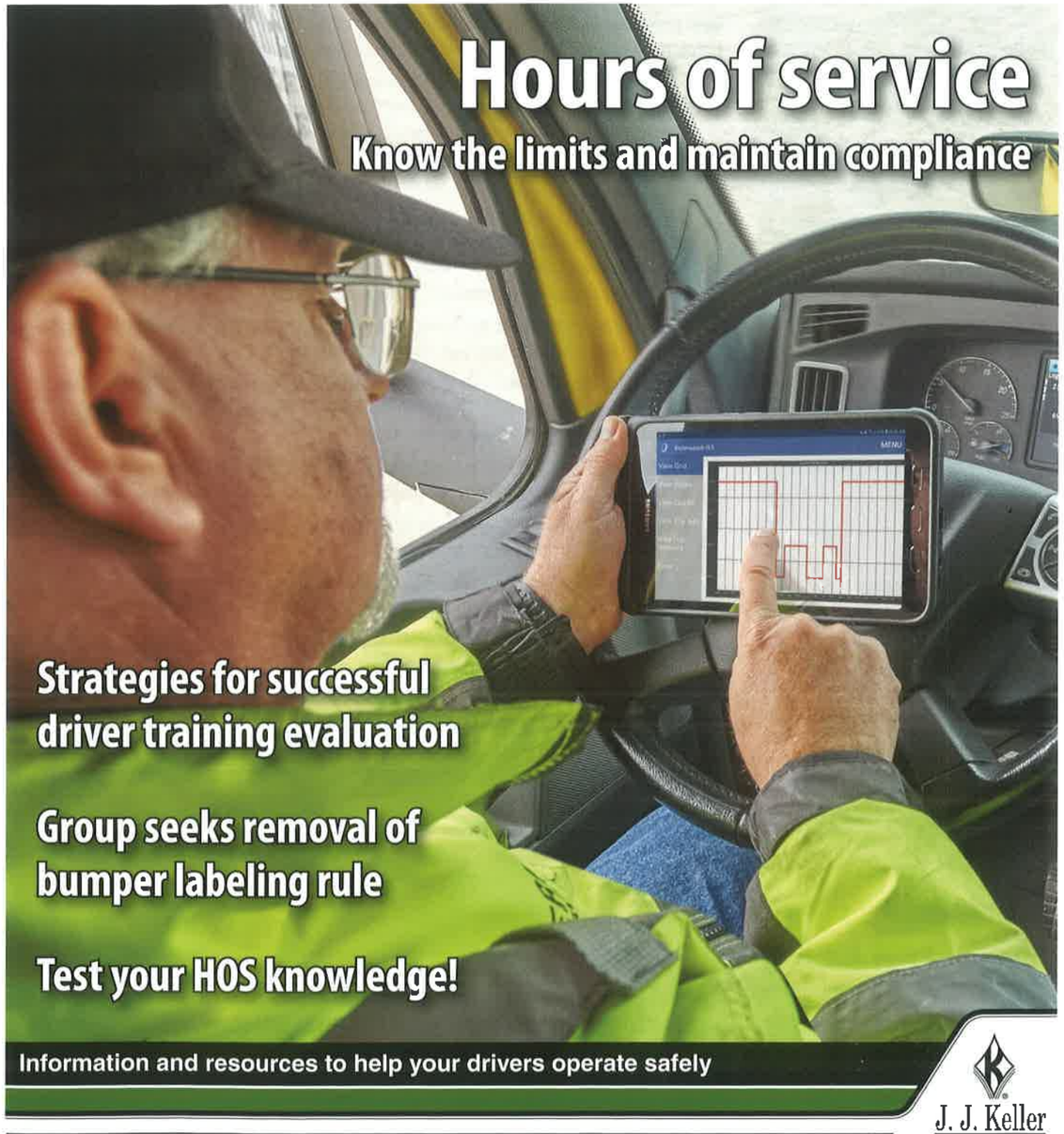
Transportation Safety Training ADVISOR

June 2025



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MESSAGE FROM THE EDITOR

Rev up your safety and training program

Recent reports from Bureau of Labor Statistics (BLS) data show that in 2023, transportation incidents accounted for 36.8 percent (1,942) of all work fatalities. To keep your company from contributing to next year's stats, it's important that you have an effective workplace driver safety program in place.

Wondering where to start? This 10-step program offers you some guidance. These best practices can help you create a robust company vehicle safety program that helps promote safety and reduce the likelihood of accidents.

1. **Have senior management lead, support, and enforce the program,** but ensure your employees have opportunities for involvement. Employee participation is essential to your program's success.
2. **Set clearly defined policies and procedures.** These should go over seat belt use and cellphone prohibitions, reporting collisions and moving violations, drug and alcohol prohibitions, driver qualification requirements, vehicle inspections, vehicle preventive maintenance programs, collision investigations, disciplinary action, incentive programs, employee performance reviews, and training program participation.
3. **Have drivers sign an agreement** that they are aware of, understand, and will follow the vehicle safety policies and procedures.
4. **Periodically review each driver's motor vehicle record (MVR).** Also, set eligibility requirements for drivers. Carriers are required to review the MVR at least once a year, if not more often.
5. **Establish a process to report and investigate all crashes,** regardless of the severity. Drivers should be instructed on what to do in case of a collision.
6. **Set procedures for vehicle maintenance and inspection.** Drivers should know how to report driving issues.
7. **Address violations of your vehicle safety program through a disciplinary action system.** Discuss discipline based on certain program violations.
8. **Reward employees who consistently drive safely** or otherwise contribute to the success of the vehicle safety program.
9. **Provide ongoing driver safety training.** This should cover your company's policies and procedures as well as other topics. Topics might include distracted, defensive, and fatigued driving; weather-related safety; heat and cold stress; and communication procedures or expectations, particularly for lone drivers.
10. **Ensure vehicles and drivers comply with all applicable highway safety laws and regulations.** These regulations exist for a reason! ♦

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.

Hours of service: Know the limits and maintain compliance

The hours-of-service (HOS) regulations limit the number of hours commercial drivers can operate a vehicle. These regulations are located in Part 395 of the Federal Motor Carrier Safety Regulations (FMCSRs).

The main goal of the HOS regulations is to keep fatigued drivers off the road.

To stay compliant with HOS regulations, drivers must:

- Understand driving limits, and
- Keep accurate and complete records of duty status (using an electronic logging device [ELD] or log book).

TIP: Start with a Q&A session to see what your drivers already know about HOS limits. Take note of what they don't know and use this blueprint and training handout to help fill in the gaps.

What drivers can do in a day

Compliance requires that drivers understand the limits and create accurate and complete records of duty status.

11-hour driving rule

- All time spent behind the wheel of a commercial motor vehicle (CMV) is considered driving time.
- After driving for 11 hours, drivers must have at least 10 consecutive hours of off-duty time before driving again.

14-hour duty limit

- The 11 hours of driving time must fall within a period of 14 consecutive hours of duty time.
- Drivers cannot continue beyond the 14th consecutive hour after coming on duty until they've had at least 10 consecutive hours off duty. Drivers may still work, but no additional driving is allowed.
- The 14 hours are consecutive from the time the driver starts the tour of duty. Lunch breaks and other off-duty time don't extend the 14-hour period.

TIP: Make sure your drivers understand that the 14 duty hours are continuous, and short periods of time off duty will not extend the 14-hour "window."

Break time!

Drivers are required to take one 30-minute break from driving after driving for 8 hours. This break may include off-duty time, on-duty non-driving time, and sleeper berth time.

What drivers can do in a cycle

These rules are based on the amount of on-duty time in a 7- or 8-day period.

60-hour/7-day limit

- If the motor carrier doesn't operate CMVs every day of the week, then drivers must not drive after accumulating 60 hours on duty during 7 consecutive days.

70-hour/8-day limit

- If the motor carrier does operate CMVs every day of the week, then drivers must not drive after accumulating 70 hours on duty in 8 consecutive days.

34-hour restart

- Drivers have the option to "restart" the calculation of the 60-hour/7-day limit or 70-hour/8-day limit by taking at least 34 consecutive hours off duty.
- The time may be spent off duty, in a sleeper berth, or using any combination of the two, but the time must be consecutive (no driving or on-duty time allowed).
- Once at least 34 hours of rest have been taken, a new 7- or 8-day period begins, and the hours worked before the rest break began are no longer taken into consideration.

What your drivers need to know about HOS limits

A driver may not drive a CMV:

- More than 11 hours following 10 consecutive hours off duty;
- Beyond the 14th consecutive hour after coming on duty, following 10 consecutive hours off duty;
- If more than 8 hours have passed since the end of the last break in driving time of at least 30 consecutive minutes; or
- If all driving and on-duty time combined is more than:
  - 60 hours in any 7 consecutive days, or
  - 70 hours in any 8 consecutive days. ♦

TIP: Bring an ELD to the training session and offer hands-on learning for drivers who aren't familiar with how it works or need more practice.

What about ELDs?

To help prevent fatigued driving and ensure compliance with hours-of-service rules, most regional and long-haul CMV drivers are required to use approved electronic logging devices (ELDs) to keep track of their time.

When it comes to using an ELD, drivers need to understand how to handle unassigned driving hours, record duty status changes, edit records, certify records, report ELD malfunctions, and more.

Keep these on hand

Drivers must have the following items with them onboard:

- A user's manual for operating the ELD;
- Step-by-step instructions for transferring HOS records to an authorized safety official;
- An instruction sheet on reporting ELD malfunctions and recordkeeping procedures during ELD malfunctions; and
- A supply of blank driver's records of duty status (paper grid graphs) to record driver duty status and related information for at least eight days, in case of ELD malfunction.

And if the ELD malfunctions?

If the ELD malfunctions, drivers should:

- **Notify** the motor carrier and explain the malfunction in writing within 24 hours,
- **Reconstruct** the record of duty status for both the current 24-hour period and for the previous seven consecutive days unless they already have the records, and
- **Continue to manually prepare** records of duty status until the ELD is repaired and compliant.

Remember that drivers cannot use a paper log or electronic logging software that meets the requirements in 395.8 for more than eight days after the ELD malfunctions, or they may be placed out of service. ♦

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TEST YOUR KNOWLEDGE — HOURS OF SERVICE

1. After how many hours on duty within eight consecutive days are you no longer allowed to drive?

A. 100

B. 70

C. 60

D. 55

2. All time spent behind the wheel of a CMV is considered driving time.

A. True

B. False

3. After eight hours behind the wheel without a break in driving, you must take a _____

A. 30-minute break

B. 20-minute break

C. 15-minute break

D. 45-minute break

4. The main goal of HOS regulations is to keep carriers' profits up.

A. True

B. False

5. How many consecutive hours of off-duty time must a driver have to restart the 60-hour/7-day limit or 70-hour/8-day limit?

A. 43

B. 34

C. 24

D. 12 ◆

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Strategies for successful driver training evaluation

One of Brad's job responsibilities is to conduct driver training. Brad's training program covers critical subjects including defensive driving, regulatory issues, and company policy and procedure. The instruction is conducted on a regular basis.

Though Brad believes the program is solid, Brad often questions whether drivers are understanding and applying the information presented.

Effective evaluation of the training session can help determine the level of learning that took place and whether the session helped to improve driver job performance. The following are a few ways to evaluate training sessions.

Pre-tests and post-tests

Pre-tests and post-tests allow trainers to evaluate their drivers' level of understanding prior to and at the conclusion of training.

The pre-test provides information on the drivers' current understanding and/or misunderstanding of the subject being presented. It also helps identify which areas to focus on during the session.

In addition to serving as a review of the session, the post-test helps a trainer evaluate its effectiveness. The post-test should be used in conjunction with the pre-test to identify any area(s) that may require additional instruction.

Feedback

Distribute a survey as the session is wrapping up, but prior to closing remarks. Make sure enough time is allotted to complete the survey.

Doing this after closing remarks or asking drivers to complete the survey after the scheduled ending time for the training session doesn't leave enough time for drivers to provide thoughtful feedback.

When creating the survey, make sure it includes both open and closed questions about how drivers are using what they learned in class. This will help determine the relevance and appropriateness of the topic(s) presented.

Supervisor observations

Supervisors are a valuable resource. They are able to observe a driver's performance before and after a training session and note changes or improvements.

Make sure supervisors are aware of the training schedule and the subjects being taught. Provide a copy of the training materials to the supervisors.

After the training session, reach out to supervisors on a periodic basis to check on driver progress when it comes to the topics presented.

Measure performance

Compare safety, productivity, or quality measures for the month before and the month after the training.

Again, at the end of six months, compare these same measures to the results for the month prior to and after the training. Look for improvement as well as problems or issues that should be addressed with refresher training. ♦

Group seeks removal of bumper labeling rule

The commercial vehicle enforcement community is taking another stab at eliminating the need for labels on rear-impact guards.

The Commercial Vehicle Safety Alliance (CVSA) has again petitioned the Federal Motor Carrier Safety Administration (FMCSA) to remove the labeling requirement found in 49 CFR 393.86(a)(6), arguing that "many motor carriers are simply unable to comply."

Manufacturer certification

The rule requires that rear-impact guards on commercial motor vehicles have a label certifying that the guards comply with the DOT's manufacturing standards at the time of production.

Motor carriers and drivers are expected to ensure these labels remain in place, while the CVSA is expected to enforce the rule during roadside inspections. The group

argues in its petition, however, that the labels "frequently wear, fade, fall off, or are removed during repair."

"The requirement that the label be maintained throughout the life of the vehicle, after potentially hundreds of thousands of miles, is not practical," the March 11 petition states.

If a driver gets cited for a missing label, getting a replacement "is often impossible since many manufacturers will not provide replacement certification labels," the CVSA wrote, adding that most manufacturers are unwilling to recertify a component after it leaves the factory.

A recent survey of its members by the American Trucking Associations (ATA) found that the problem impacts up to about 50 percent of the trailers currently in service.

If at first you don't succeed...

This isn't the first time the CVSA has pressed for the rule change.

The group first petitioned the FMCSA in 2019 to get the labeling requirement rescinded. The FMCSA denied the petition in September last year but three months later issued a statement saying that drivers should not be considered to be in violation if the label is illegible, incomplete, or even missing.

The CVSA also petitioned the National Highway Traffic Safety Administration in 2019 to get the agency to stop requiring manufacturers to apply the label in the first place, but the petition was denied on the grounds that it could harm highway safety.

For now, the CVSA's March petition rests with the FMCSA and the labeling rule remains in effect, though drivers and motor carriers should not be cited for violations. ♦

Expert Help: Question of the Month

Question: **If I'm hiring a CDL driver, is it required that we have an application within 30 days? If yes, does it matter that they are in training?**

Answer: The DOT application must be completed and signed by all CMV drivers (CDL and non-CDL) before they operate a carrier's CMVs in support of the business (this includes any operation of the vehicle in areas/roads where the public can travel besides the road test).

If a driver is in training, then that time is considered in support of the business if they are driving a vehicle with a trainer/mentor. The application would need to be filled out and certified/signed by the driver before they start road training.

The allowance of 30 days after hire is only to get the motor vehicle records (MVRs) from all states in which the driver held a license in the last three years, as well as the prior employment verifications from DOT-regulated employers in the prior three years as allowed under 391.23. ♦

Expert Help

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Next Month's Topic: Effects of drugs and alcohol

When under the influence of drugs and/or alcohol, people's inhibitions are lowered and they are more likely to participate in dangerous activities. Drivers who have accurate information about the regulations, consequences, and treatment options are more likely to get help before a tragedy occurs. ♦

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EDITOR: Lucero Truszkowski

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