

Transportation Safety



Training ADVISOR

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Paperwork management

Road-ready requirements

Get up to date on DataQs

New FMCSA waiver for
medical certification

Is certain documentation
needed for a rental?

Information and resources to help your drivers operate safely



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In This Issue

Training Blueprint3

Make sure your drivers know which types of paperwork they need to have on hand, and which ones they don't!

Training Handout.....4

To carry or not to carry? What you need to know about electronic vs. paper documents.

Test Your Knowledge5

Have your drivers got all their paperwork knowledge in order?

Get up to date on DataQs...6

These long-awaited changes are coming to fruition — make sure you keep up with changes.

New FMCSA waiver for medical certification6

CDL drivers will have 15 days to use paper medical cards while the appropriate agencies transition to electronic systems.

Expert Help7

Is certain documentation needed for a rental?



MESSAGE FROM THE EDITOR

Syncing your paper and digital worlds

Many documents required under the Federal Motor Carrier Safety Regulations may be kept electronically, according to 390.32, but there are certain standards that electronic documents must meet. Let's talk about what's required of documents that may be stored electronically.

Electronic records must:

- Be legible;
- Contain all required information, including signatures;
- Be accessible upon demand to anyone entitled to inspect them; and
- Remain legible and complete if/when printed onto paper.

If a document starts out on paper, you can scan it and store it electronically. You can even discard the original once it's scanned. You cannot, however, convert a paper document into an electronic one by typing the information into an electronic form. By doing so, you're creating a new document, not an electronic copy.

Keep it organized

For all the non-digital documents your drivers must carry on their person or in the vehicle, it's a good idea to provide them with some options for keeping everything organized. This could include:

- **A binder.** Use sheet protectors and/or three-hole punched zipper pouches to keep all the paperwork clean, tidy, and in one place.
- **An accordion folder.** Divide paperwork by type (shipping papers, receipts, etc.) or by trip to make specific documents easy to access quickly.
- **A trip envelope.** Keep trip-specific paperwork handy in a designated trip envelope or door pouch.
- **A color code.** Make items easier to find by color coding them. Drivers can color code individual documents with sticky tabs or a highlighter, or color code the container that the documents go in (e.g., color the folder tab red for hazardous materials).
- **Labels.** Use a marker to create a clearly labeled binder, folder, or other container so it's easy to put away and retrieve each kind of document. It shouldn't take more than a couple of seconds to put documents where they belong so they're easy to find later.

Having the required paperwork available and easily accessible will help keep your drivers out of hot water with inspection officials. ♦



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 — PAPERWORK MANAGEMENT

Road-ready paperwork requirements

The type of paperwork drivers are required to carry depends on:

- Whether the driver operates as a for-hire or private carrier,
- Whether the driver operates in interstate or intrastate commerce, and
- The type of commodity the driver is hauling.

TIP: Make sure drivers understand which types of paperwork can be electronic and which need to be carried as a hard copy.

The following is a general list of documents drivers should have available:

- **Operator's/driver's license.** A current, valid license for the type of vehicle the driver is operating.
- **Medical card,** if the driver doesn't hold a commercial driver's license (CDL), or, if a CDL holder's medical status is not available on their motor vehicle record (MVR).
- **Permit credentials.** Based on the type of motor carrier operation you have, the driver may need the following:
 - Base state or International Registration Plan (IRP) cab card,
 - International Fuel Tax Association (IFTA) license and decals,
 - State authority credentials,
 - Proof of insurance, and
 - Other necessary trip or special permits.
- **Shipment paperwork.** A for-hire carrier needs a bill of lading or some type of shipment documentation.
- **Hours-of-service (HOS) records.** A driver needs electronic logging device (ELD) records or paper logs if the driver isn't using one of the short-haul exemptions in 395.1(e).
- **HOS supporting documents,** like fuel receipts, toll receipts, etc.
- **ELD documentation:**
 - A user's manual for operating the ELD;
 - An instruction sheet with 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 paper grid graphs to record driver duty status and related information for at least eight days, in case of ELD malfunction.

- **Lease agreement,** if the vehicle is leased.
- **Documentation of annual/periodic inspection.** A copy of the annual/periodic inspection report or an annual inspection sticker/decal is required. If complying with a mandatory state inspection program, any required document for that program must be on the vehicle.

TIP: Talk to drivers about what an electronic signature is: A method used for signing an electronic document that identifies and verifies the person signing the document.

- **Hazardous materials paperwork.** Depending on which hazardous materials are being hauled, the driver may need the following:
 - Shipping papers;
 - A hazardous waste manifest;
 - Emergency response information;
 - Certification of registration with the Pipeline and Hazardous Materials Safety Administration (PHMSA) if the registration number isn't included on another document;
 - Placards;
 - Safety plans;
 - Hazardous Materials Safety Permit Program (HMSP) paperwork, if required; and
 - If transporting Division 1.1, 1.2, 1.3:
 - A copy of Part 397,
 - Instructions on what to do in the event of an accident or delay in shipment, and
 - A written route plan. ♦



TIP: Help drivers stay organized by providing them with a document holder to carry in their vehicles.



TRAINING HANDOUT — PAPERWORK MANAGEMENT

To carry or not to carry: Electronic vs. paper documents

When working with electronic documents, remember that they must:

- Be legible;
- Be able to be presented during an inspection; and
- Contain the required information, including an electronic signature, if a signature is required on the document.



The following documents can be presented electronically during a roadside inspection:

- Shipping documents (non-hazardous materials),
- Lease agreements,
- Medical cards (if applicable),
- Medical waiver/exemption paperwork,
- HOS documents (including electronic versions of paper logs and the required accompanying documentation for an ELD), and
- Annual/periodic vehicle inspection reports.

Documents that must be carried via hard copy by the driver or in the vehicle include the driver's license and hazmat shipping papers. ♦



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TEST YOUR KNOWLEDGE — PAPERWORK MANAGEMENT

1. What must be true of any electronic documents you work with?
 - A. They must be legible
 - B. They must be able to be presented during an inspection
 - C. They must be password protected by the carrier
 - D. Both A and B

2. You can present an electronic driver's license to an inspection officer.
 - A. True
 - B. False

3. Which type of ELD documentation do you NOT need to have available?
 - A. A supply of paper grid graphs
 - B. An ELD user's manual
 - C. The warranty agreement for the ELD model
 - D. An instruction sheet on reporting ELD malfunctions and recordkeeping procedures

4. The paperwork you're required to carry can vary based on the commodity you're hauling or whether you're operating interstate/intrastate.
 - A. True
 - B. False

5. Which of these documents may NOT be presented electronically?
 - A. Lease agreements
 - B. Hazmat shipping papers
 - C. Annual/periodic vehicle inspection reports
 - D. Shipping documents (non-hazardous materials) ♦

NAME: _____ DATE: _____

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Get up to date on DataQs

The Federal Motor Carrier Safety Administration (FMCSA) is working to finalize improvements to the DataQs system to increase transparency and fairness. The agency specifically aims to improve the Request for Data Review (RDR) process to help streamline the methods carriers must use to challenge data on roadside inspection and crash reports.

Setting a standard

FMCSA's proposal includes adding a standardized review process for RDRs that states must follow. This process would require multi-level review that includes an initial review process, a reconsideration process, and a final review process. In some states, this process, or something similar to it, is already in place.

Initial review process

The initial review process begins with a carrier or driver who files the RDR using the current process for either:

- Roadside inspection data from the previous three years, or
- Any crash data from the previous five years.

The assigned state office has 21 days to conduct the initial review, and the person filing the RDR has 14 days to reply to any requests for more information. The officer that issued the roadside inspection or crash report cannot be the sole decision maker.



If an RDR is closed with no action, the state will provide the requestor with the decision maker (name and job title), evidence reviewed, the specific reason(s) for the decision, and information on the reconsideration process.

Reconsideration process

The reconsideration process is conducted if the RDR requestor wants the initial decision reviewed, giving the state office 21 days to complete the reconsideration review. The decision will be made by a team other than the issuing officer or the issuing officer's supervisor.

If a reconsideration is closed with no action, the state will provide the decision maker (name and job title), evidence reviewed, the specific

reason(s) for the decision, and information on the final review process.

Final review process

The final review process is conducted if the RDR requestor is not satisfied with the reconsideration process, giving the state officer 30 days to complete the final review.

The decision must be made by senior leadership within the state agency or a panel assembled to hear final review requests (the panel can be made up of law enforcement and industry). Anyone involved in the initial or reconsideration decisions cannot be involved in the final review. ♦

New waiver grants CDL drivers 15 days to use paper medical cards

The Federal Motor Carrier Safety Administration (FMCSA) granted a waiver to allow a paper copy of the medical examiner's certificate to serve as proof of certification for up to 15 days after issue, through October 12, 2025. There are two key impacts of this waiver:

1. Commercial driver's license (CDL) drivers can use paper medical cards as proof of medical certification for up to 15 days after the certificate has been issued (following the DOT exam) while operating a commercial motor vehicle (CMV).
2. Carriers can use the medical card in the DQ file to be replaced by the CDL motor vehicle record (MVR) with the latest medical certification within 15 days.

This waiver applies to commercial learner's permit (CLP) holders, as well. Non-CDL drivers are not affected by this waiver since they are already required to be issued a medical card.

FMCSA decided drivers should not be punished for delays that may occur while medical examiners and State Driver's Licensing Agencies (SDLAs) transition to the



new system. The agency feels that this waiver is in the best interest of the public and will provide the same, if not a greater, level of safety.

Background

As of June 23, all SDLAs were expected to be connected to the National Registry of Certified Medical Examiners (NRCME). This system is where examiners enter medical certification information after each exam.

Each state was also expected to switch to the new process once their system was ready to receive CDL driver medical certification information, which would then appear on the MVR and mean that CDL holders would not need physical proof of certification.

A copy of a CDL driver's MVR was expected to be in the driver's qualification file after each exam. FMCSA still required a copy of a non-CDL driver's medical card to be in the driver qualification file.

This meant that:

- CDL drivers wouldn't need to self-certify their medical cards with the SDLA because it would be done through the NRCME to SDLA connection, and
- Carriers wouldn't need to note that the examiner was on the NRCME on the date of the exam.

The waiver's terms and conditions

The waiver does not apply to:

- A driver who doesn't have a copy of their current, valid medical examiner's certificate that was issued by a certified examiner 15 days prior; or
- A motor carrier that doesn't have a copy of its driver's current, valid medical examiner's certificate that was issued 15 days prior.

Additionally, the FMCSA reserves the right to revoke the waiver if safety conditions are negatively impacted in terms of the goals and objectives of the original order. ♦



Next Month's Topic: Disqualification

Driver disqualification is a serious issue. A driver holding a commercial driver's license or learner's permit can be disqualified from driving a commercial vehicle if convicted of certain violations while driving any type of vehicle. Drivers must understand the disqualification provisions that can impact their careers. ♦



Expert Help: Question of the Month

Question: My current work truck broke down and I had to obtain a rental. Is there certain documentation or different paperwork that my driver has to carry with him through the scales? Also, does he have to do anything with the rental regarding the DOT or MC number?

Answer: The rental agreement must be carried on board. The driver should present the rental agreement at roadside inspections. The driver must complete all standard inspections of the vehicle (pretrip, enroute, and post-trip) and complete DVIRs if problems are found or if the driver is made aware of problems. The driver and the carrier are held responsible for the safe operation of the vehicle including any vehicle violations found during a roadside inspection.



The vehicle needs to be properly marked in accordance with 390.21. Per paragraph (e) of 390.21, if the rental term is 30 days or less, the vehicle can be conditionally marked with the lessor's name and USDOT number.

If the rental is for a period of 8 days or less, the driver is conditionally allowed to use paper logs but must have the exemption with them. If the rental period is greater than 8 days or renewed after 8 days and the driver is required to log, an ELD must be installed. ♦

Expert Help

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