

The **Motor Carrier's Guide** to Roadside Inspections



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INTRODUCTION

As a motor carrier, you have a lot to manage. Not only must you ensure the safety of your drivers as well as the general public, but you also have a responsibility to remain compliant with regulations set by the Federal Motor Carrier Safety Administration (FMCSA). To illustrate this compliance, passing roadside inspections is critical. Failing to do so could result in thousands of dollars in fines or even out-of-service (OOS) orders, which prevent drivers from operating commercial motor vehicles until issues are fixed.

However, remaining FMCSA-compliant presents its own set of unique challenges, as violations are often caused by a lack of driver accountability or their failure to complete thorough pre-trip inspections. Specifically, some of the most common FMCSA violations stem from the following situations:

- A driver operates a commercial motor vehicle without a commercial driver's license.
- A driver is not physically qualified to operate a commercial motor vehicle.
- A driver fails to properly secure a load.
- A vehicle has a flat tire or an audible air leak.
- A vehicle's brakes are out of service.

Because you are putting immense trust in your drivers, it's important to have policies and procedures in place to avoid violations and intervene as issues arise. However, once a driver leaves your facility, monitoring their on-the-road behavior and compliance becomes more difficult. These concerns are compounded when you consider that roadside inspections can occur at random, leading to potential corrective actions or even business disruptions.

This guide provides an overview of roadside inspections, highlighting what they are and why they're important. It also includes general best practices motor carriers can use to prepare their drivers for roadside inspections. As a reminder, this resource is informative in nature and is not meant to substitute advice from legal or insurance professionals.



ROADSIDE INSPECTIONS AND WHY THEY'RE IMPORTANT

Put simply, roadside inspections are examinations of commercial motor vehicles or drivers. These inspections are conducted by specially trained inspectors on behalf of the FMCSA and are used to:

- Gather compliance and safety data regarding motor carriers and their drivers.
- Identify the most prominent compliance and safety issues.
- Intervene when motor carriers or their drivers are in violation of FMCSA regulations or operating unsafely.

While this may seem fairly straightforward at first glance, the truth is that the roadside inspection [process](#) is incredibly detailed. What's more, the FMCSA isn't the only player when it comes to overseeing regulations and procedures related to the roadside inspections. The table below highlights the major governing bodies and associations to be aware of:

The Who's Who of Roadside Inspections	
Governing Body/Association	Their Role in Roadside Inspections
The Department of Transportation (DOT)	<p>The core mission of the DOT is to ensure the United States has one of the safest and most efficient transportation systems in the world. As part of this mission, the DOT is responsible for commercial motor vehicle safety. It has overall authority when it comes to commercial fleets and is responsible for creating legislation to better monitor motor carriers and provide guidance.</p> <p>In terms of roadside inspections, the DOT established the FMCSA through the Motor Carrier Safety Improvement Act. This act was meant to create an agency with the sole purpose of overseeing motor carrier safety and compliance (e.g., ensuring commercial fleets and their drivers are doing their part to reduce crashes on U.S. highways).</p>
The Commercial Vehicle Safety Alliance (CVSA)	<p>The CVSA is a nonprofit association dedicated to ensuring the uniformity of commercial motor vehicle inspections and enforcement activities throughout the United States, Canada and Mexico. The CVSA is comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. It provides guidance and education to key stakeholders, including enforcement officials, industry representatives and policymakers.</p> <p>Prior to the CVSA, there was little to no cohesiveness between the states when it came to roadside inspections. That is to say that, if a commercial motor vehicle was inspected in one state, that vehicle would need to be inspected again once it crossed state lines. Today, through the CVSA, there are standardized criteria and processes related to roadside inspections.</p>

The Impact of Poor Roadside Inspections

Roadside inspections are particularly important, as violations count against motor carriers as part of the FMCSA's CSA enforcement program. Essentially, CSA is a monitoring and evaluation system that allows the FMCSA to intervene when safety regulations are not being followed by carriers or their drivers.

Here's an overview of how it works. Your company's performance data appears online in the FMCSA's Safety Measurement System (SMS). Data in this system—most of which is available to the public—is updated once a month to include the latest information related to driver and vehicle violations, crash reports from the last two years and investigation results. The FMCSA organizes SMS data into seven Behavior Analysis and Safety Improvement Categories (BASICS):



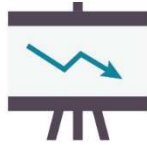
The FMCSA then measures a motor carrier's performance under each one of these BASICS, assigning them a score and prioritizing riskier fleets for interventions (e.g., warning letters, investigations and fines). Notably, scores are based upon roadside, on-site and off-site inspection results and are reflected as a percentage rank from 0 to 100. The higher the percentile, the worse the safety performance.

This percentage is then compared to a predetermined threshold the FMCSA uses to flag problematic fleets and take corrective action, making it all the more important to prepare for roadside inspections to maintain low BASIC scores. In fact, poor inspections and BASIC scores can lead to the FMCSA:

- Issuing warning letters
- Recommending a focused or comprehensive audit
- Placing a vehicle or driver OOS

Around 3.5 million roadside inspections are conducted each year, leading to approximately 1 million driver violations and 3.8 million vehicle violations.

As a motor carrier, preparing for roadside inspections and maintaining BASIC scores below the intervention threshold is crucial. Not only does this demonstrate to the FMCSA that your fleet is operating safely, but it can also help you avoid being flagged by the FMCSA and the potential consequences that come with it, including:



Business interruptions and lost revenue following OOS orders



Reputational harm from poor, public-facing BASIC scores



Fines



Increased insurance costs



LEVELS OF ROADSIDE INSPECTIONS

There are eight types of CVSA inspections, each of which examines different aspects of a commercial motor vehicle and the drivers who operate them. Those inspections are as follows:

- Level I: North American Standard Inspection
- Level II: Walk-around Driver/Vehicle Inspection
- Level III: Driver-only Inspection
- Level IV: Special Inspections
- Level V: Vehicle-only Inspection
- Level VI: North American Standard Inspection for Transuranic Waste and Highway Route Controlled Quantities (HRCQ) of Radioactive Material
- Level VII: Jurisdictional Mandated Commercial Vehicle Inspection
- Level VIII: North American Standard Electronic Inspection

For the purposes of this guide, we will provide an overview of Level I, II and III inspections, as they are the most common. A breakdown of what's included in these inspections can be found in the chart below:

Type of Inspection	What's Included in the Inspection
Level I: North American Standard Inspection	<p>Level I inspections are the most common and thorough. During these inspections, inspectors examine important documents, including:</p> <ul style="list-style-type: none"> • The vehicle operator's commercial driver's license • Medical certificates, which confirm whether or not the driver has passed their annual physical exam • Logbook records for the last eight on-duty days • Medical cards or waivers <p>Additionally, inspectors will look for signs of driver impairment and examine aspects of the vehicle, including:</p> <ul style="list-style-type: none"> • Seat belts • Exhaust systems • Turn signals • Tail lamps • Headlamps • Steering wheels • Wheels and rims • Fuel systems
Level II: Walk-around Driver/Vehicle Inspection	<p>Level II inspections include everything in Level I inspections. The main difference is that, in Level II inspections, inspectors don't examine any components found underneath a vehicle.</p>
Level III: Driver-only Inspection	<p>Level III inspections examine a driver's credentials. Specifically, they include a review of:</p> <ul style="list-style-type: none"> • Skill performance evaluation certificates • Driver's licenses • Medication certifications • Record of duty status (RODS) logs • Seat belt usage • Inspection reports signed by the driver

OOS Orders

If, at any point, inspectors find critical issues, they may place vehicles or even drivers OOS. OOS vehicles can't be operated until issues identified in the inspection are addressed. When drivers are placed OOS, they are disqualified from operating a commercial motor vehicle for an extended period of time. Inspectors may even fine drivers or motor carriers for driver violations.

OOS orders result in significant downtime, fines, poor BASIC scores and reputational harm. As such, it's important to understand some of the most common reasons vehicles and drivers are placed OOS:



Vehicle maintenance issues—When it comes to vehicle maintenance, even a simple oil leak can lead to OOS orders. To avoid such issues, it's important to conduct exhaustive pre- and post-trip inspections, paying close attention to the vehicle's lights, brakes and tires.



Driver issues—Drivers may be placed OOS for a variety of reasons. For instance, they may not be physically fit to operate a commercial motor vehicle or have the correct documents, permits or endorsements on hand. Drivers may also be placed OOS for HOS violations or if they're found operating a commercial motor vehicle under the influence of drugs or alcohol. To prevent these violations, motor carriers should maintain accurate and up-to-date driver qualification (DQ) files and stress the importance of road safety, addressing driver issues as they arise.



Cargo issues—Just one issue regarding cargo can result in an OOS order. In fact, motor carriers can receive misdemeanor criminal charges for using misprinted labels or improper tiedowns. Furthermore, every state sets weight limits for freight trucks, and violating those limits could result in OOS orders.

It should be noted that drivers and vehicles can be placed OOS of a variety of reasons as outlined in the CVSA's North American Out-of-Service Criteria. To purchase a copy of this criteria, click [here](#).



WHO GETS SELECTED FOR INSPECTIONS?

Drivers and vehicles may be flagged for inspections for a variety of reasons. Specifically, inspections may occur if:

- **An inspector notices an easily visible violation**—If an inspector identifies a violation simply by looking at a vehicle, a full inspection may occur. Easy violations for inspectors to catch can include:
 - Nonfunctioning lights
 - Missing reflectors
 - Defective tires
 - Improper cargo securement
 - Missing or unreadable DOT numbers
 - Damaged windshields
- **A patrol officer notices a driving infraction**—Commercial motor vehicles can be pulled over for moving violations. When this occurs, inspectors will often, at a minimum, conduct a Level III

inspection. Traffic violations that could lead to roadside inspections include speeding, following too close, failing to obey traffic signs, parking illegally and changing lanes improperly.

- **A motor carrier has a high Inspection Selection System (ISS) score**—The ISS, which is based on BASIC scores, is used at roadside inspection stations to help inspectors identify and prioritize motor carriers for safety inspections. Under the ISS, carriers are assigned an inspection recommendation as follows:
 - Inspect (an inspection is warranted)
 - Optional (an inspection may be warranted)
 - Pass (an inspection is not required)

If any one of a motor carrier's BASIC scores is over the threshold, they will, at best, receive an Optional recommendation under the ISS. If multiple BASIC scores are above the threshold, the motor carrier will receive an Inspect recommendation under the ISS. Motor carriers can view their ISS scores [here](#). If you've never accessed your ISS scores before, you may have to set up an account, which you can do [here](#).

- **The vehicle is involved in an accident**—In most jurisdictions, both the commercial motor vehicle and its driver will be inspected following an accident.

Inspections may also be random. This often occurs if an inspector at a fixed facility hasn't seen any violations for a long period of time or during the CVSA's annual International Roadcheck.

During the International Roadcheck, inspectors conduct Level I inspections, examining both driver operating requirements as well the mechanical fitness of commercial motor vehicles. If no critical inspection item violations are found during a Level I inspection, a CVSA decal will be applied to the vehicle, indicating that the vehicle successfully passed a decal-eligible inspection conducted by a CVSA-certified inspector. If an inspector identifies any violations, they may render the driver or vehicle OOS until the violations are corrected.

The CVSA randomly inspects tens of thousands of vehicles during the International Roadcheck, which often leads to an uptick in OOS orders.



THE INSPECTION PROCESS

Inspections often occur at weigh stations and ports of entry, but they can occur wherever inspection officers feel it is safe to perform one. When it comes to inspections, there are differing procedures for drivers and vehicles.

Driver Inspections

Approximately 5% of driver inspections result in OOS orders, underscoring the importance of understanding what the inspection process entails. The following sections provide an overview of the main components of driver inspections.

Interview

Driver inspections typically begin with an interview. In this portion of the inspection, the inspection officer will start by approaching the vehicle, making note of its general condition. The more issues an inspector notices as they approach the vehicle, the more likely they are to perform a full inspection as opposed to a driver-only inspection.

Once the officer reaches the driver, they will introduce themselves and begin the interview. Typically, officers will start with general questions, which can include the following:

- What is your name?
- Who do you work for?
- What are you hauling?
- Where are you coming from?

- Where are you going?
- Where and when did you start your day?
- What problems have you encountered lately?

Officers will compare the driver's answers to these questions to other information gathered throughout the inspection. Furthermore, during the interview, the officer will provide basic instructions to the driver and prepare them for the rest of the inspection.

It should be noted that inspectors will also examine the driver's behavior throughout the interview and inspection. Specifically, the inspector will try to determine if the driver may be impaired by illness, fatigue, drugs or alcohol. Based on the inspector's suspicions, drivers could be subjected to:

- A fatigue assessment
- A field sobriety test
- An examination by an officer trained in drug recognition

In some cases, drivers may be arrested and asked to take a drug or alcohol test.

Document Verification

As part of driver inspections, officers will verify what motor carrier the driver works for and whether or not that driver is qualified to operate a commercial motor vehicle. Often, inspectors will ask drivers for the vehicle's registration, logs, shipment paperwork, medical cards, licenses and similar paperwork.

In terms of motor carrier-related information, inspectors will check that:

- The motor carrier's DOT number is current and not inactive.
- The motor carrier does not have any outstanding OOS orders.
- The motor carrier's Unified Carrier Registration is current (used for interstate carriers).
- The carrier has valid for-hire authority, if applicable.
- The vehicle's required credentials are correct and valid.

For drivers, inspectors will:

- Run driver's licenses to secure a motor vehicle report (MVR). This is done to verify that the driver's license is current and valid. Inspectors will also note any classes, endorsements and restrictions detailed on the license, ensuring drivers are qualified to operate the vehicle.
- Verify that the driver is medically qualified to operate a commercial motor vehicle. For commercial driver's license holders, this involves ensuring medical information listed on MVRs is current. For other license holders, inspectors will review the driver's medical card. Inspectors will also check that drivers are complying with any medical terms listed on their license or medical card (e.g., checking that the driver is wearing corrective lenses).
- Check that drivers have the necessary exemptions if they have a condition that would normally disqualify them from driving.

HOS

As part of the inspection process, officers will review a driver's RODS, as well as any supporting documents (e.g., bills of lading, shipment paperwork and fuel receipts). This is typically the most time-consuming portion of driver inspections.

As part of this process, inspection officers will examine logs for the previous seven days, checking that:

- The correct logs are being used, whether it be electronic or paper logs.
- There isn't any missing information or entries.
- There are no HOS violations.
- Records aren't being falsified.

The specific steps involved in an HOS review will depend on the type of log the driver is using.

Driver Vehicle Inspection Reports (DVIRs)

As part of driver inspections, officers will ask for DVIRs. While drivers aren't typically required to carry DVIRs, officers can request that drivers present them if they are readily available. When officers review DVIRs, they will check for unresolved vehicle issues and ensure any DVIRs that indicate issues were completed correctly. This is important, as there are significant fines for drivers who operate vehicles with known defects.

Annual (Periodic) Inspection

Inspection officers will verify that the vehicles have undergone an annual inspection, also referred to as a periodic inspection. For combination vehicles, officers will ask for proof of an annual inspection for each piece of equipment in the combination. To prove annual inspections were completed, drivers can provide a copy of annual inspection reports or show the inspection officer a decal that indicates an inspection was performed.

Once proof on an annual inspection has been provided, officers will verify that the inspection took place within the last 12 months. If drivers can't provide proof of an annual inspection, or if an investigation shows the inspection didn't occur in the last year, the officer will write a citation.

Inspection Wrap-up

Driver-only inspections typically conclude after officers verify an annual inspection was conducted. When completing the inspection, officers will make note of the driver, motor carrier, vehicle and any violations that were discovered.

Officers will then compare any issues to the CVSA's North American Out-of-Service Criteria to determine whether or not the driver should be allowed to continue to operate a commercial motor vehicle. Again, drivers may be placed OOS for a [variety](#) of reasons, including if they are caught driving with a suspended license, carrying the wrong type of license, operating a vehicle impaired or violating HOS regulations.

After the inspection is complete, officers will provide drivers with a copy of the report. If the driver is placed OOS, they will be given clear instructions as to what they need to do before they can operate a

commercial motor vehicle again. If the driver received a violation, but that violation did not result in an OOS order, drivers must rectify the issue as soon as possible.

Vehicle Inspections

Approximately 20% of vehicle inspections result in OOS orders, underscoring the importance of understanding what the inspection process entails. The following sections provide an overview of the main components of vehicle inspections.

Driver Prep

Before beginning the vehicle inspection, officers will generally provide an overview of the process and highlight safety precautions to ensure the inspection goes smoothly. For instance, officers may instruct drivers not to move the vehicle or operate any of the controls unless explicitly asked.

It's critical for drivers to follow the officer's instructions throughout the entire inspection process. A lapse in concentration could result in injury or failed portions of the inspection (e.g., the officer asks the driver to activate headlights, but the driver doesn't follow their instructions).

Walk-around

During the walk-around portion of the vehicle inspection, officers will review all visible lights and mechanical components. They will not look under the vehicle at this stage of the inspection.

To begin, drivers will be asked to open the hood of the vehicle so all engine and steering components can be examined. In particular, officers will be looking for damage as well as loose components, connection points or hardware. They will also examine the compressor and look for any leaks. For full vehicle inspections, officers may check brake adjustments as well.

After inspecting the engine and steering components, the officer will walk around the vehicle, performing a visual inspection as they go. At this point, they will check that the following components are functioning and free of damage and excessive wear:

- The windshield and side windows
- The windshield wipers and washer system
- Any required lights
- Visible air and brake lines
- Cargo securement systems
- Coupling devices
- The exhaust system
- Visible portions of the vehicle's frames
- The fuel system
- Visible suspension components
- Wheel assemblies, including the tires, rims, lugs, wheels and hubs

In some cases, inspections will end after the officer completes the walk-around. In these instances, the officer will document the driver portion of the inspection as well as any vehicle defects.

The Underside

For full vehicle inspections, officers will inspect the underside of the vehicle after performing the walk-around inspection. During the full vehicle inspection, officers will examine the following:

- Brake systems, including the lines, chambers, connecting hardware, pads and any other related parts
- Brake adjustments
- Driveshafts and driveline components
- Lower exhaust components
- The inside of the frame
- The lower fuel system components
- The inside of suspension components

Braking, Steering and Coupling Testing

Following an inspection of the vehicle's underside, inspectors will work with the driver to test braking systems, steering systems and coupling devices:

- **Braking systems**—Officers will check tractor protection valves and trailer emergency brakes. For air brake vehicles, drivers will have to disconnect air supply hoses. Drivers will then be asked to step on the brakes, which allows inspectors to verify whether or not the protection valve has closed. As part of their review of braking systems, inspectors will also verify that ABS and low-air warning lights function as intended.
- **Steering systems**—To test steering systems, officers will position themselves where they can measure the steering wheel movement. The officer will then have the driver move the steering wheel, measuring how far it travels before the tire moves.
- **Coupling devices**—To test coupling devices, the officer will remove the chocks. They will then wiggle the truck or tractor against the trailer while the trailer brakes are locked. This is done to measure free play in the coupling system.

Inspection Wrap-up

When completing the vehicle inspection, officers will make note of the driver, motor carrier, vehicle and any violations that were discovered. Officers will then compare any issues to the CVSA's North American Out-of-Service Criteria to determine whether or not the vehicle should be placed OOS.

Again, vehicles may be placed OOS for a [variety](#) of reasons, including the following:

- The vehicle has a flat tire.
- The brakes are defective or damaged.
- A critical required light is not functioning.

- Cargo is secured improperly.
- Steering components are defective or excessively worn.

If a vehicle is placed OOS, the issue must be corrected before it's allowed to leave the inspection site. For critical issues that cannot be fixed on-site, vehicles may need to be towed away. For violations that do not result in OOS orders, issues must be rectified as soon as possible.



PREPARING FOR ROADSIDE INSPECTIONS

To avoid OOS orders, fines and other costly corrective actions, it's critical that roadside inspections go smoothly. To ensure the best results, consider the best practices highlighted in the sections below.

Educate Employees on Roadside Inspections

One of the best ways to ensure successful roadside inspections is to educate employees on what this process entails. Above all, drivers need to remain professional throughout roadside inspections and be prepared for the various examinations included in driver and vehicle inspections. To assist your drivers and to improve your chances of having clean roadside inspections, consider doing the following:

- Educate drivers on the roadside inspection [process](#) and what specific areas of compliance are reviewed. Doing so ensures they are addressing the most common issues that lead to OOS orders or fines during pre- and post-trip inspections.
- Train drivers how to answer DOT-related questions that may arise during a roadside inspection. Drivers should have all applicable paperwork (e.g., their driver's license, the vehicle's registration, relevant permits and shipping documentation) on hand and understand how to respond to questions regarding HOS requirements. If electronic logging devices (ELDs) are used, drivers should understand the system and be able to address HOS questions posed by inspectors.

- Instruct drivers to keep their vehicle clean. This not only makes inspections easier for officers, but it also shows your drivers are committed to ensuring the vehicle they operate is well-maintained.

Create a Fleet Safety Policy

To establish a culture of safety across your fleet and reduce the likelihood that your drivers are pulled over and subject to an inspection, it's critical to set expectations upfront. Creating a fleet safety policy can help educate drivers on their responsibilities and even outline disciplinary actions your organization will take should safety issues occur.

Your policy should cover specific violations and topics that could lead to roadside inspections (e.g., speeding) and include a progressive disciplinary system. Be specific about what actions you will take for each type of violation. Actions, like warnings, can be used for less severe safety concerns, while more severe issues like reckless driving should not be tolerated.

Ensure Licenses and Medical Certificates Are Accurate and Up to Date

To legally operate a commercial motor vehicle, drivers need to have a valid medical certificate as well as the proper licenses for the various types of vehicles they operate. Some motor carriers feel it's the driver's responsibility to ensure these documents and licenses are current, but motor carriers stand to lose just as much in the face of a violation.

In fact, both motor carriers and their employees are penalized by the FMCSA when drivers allow their licenses to expire. What's more, when a driver lets their license lapse, motor carriers may have to place them OOS, preventing the business from delivering products on time.

The following are ways to ensure licenses and medical certificates are accurate and remain up to date:

- **Educate drivers on license requirements**—There are specific restrictions related to the types of vehicles your drivers are permitted to operate based on the class of license they carry. To avoid potential roadside inspection issues, your drivers need to ensure their license is valid for every type of vehicle they operate. For example, if they have a Class B license but their role requires them to operate a tractor-trailer, they'll need to secure a Class A license first. Essentially, drivers need to understand what vehicles and trailer combos you have and which types of vehicles require a commercial driver's license. Drivers who are aware of these types of regulations are more likely to be proactive in renewing or securing valid licenses.
- **Establish a system for tracking expiration dates**—Simply put, a driver's medical certificate, license and any related endorsements are not valid after they expire. There is no grace period, and motor carriers need to stay on top of expiration dates in order to avoid potential violations and fines. To do this, carriers should create a system to track licenses and certificates that are up for renewal. These systems do not need to be complicated and can be as simple as a spreadsheet or a calendar reminder. Whatever system you decide upon, be sure your drivers have enough time to renew their documents. This ensures they are never driving with an expired license.

- **Manage convictions**—If a driver is convicted of certain offenses, they may be disqualified from operating a commercial motor vehicle. Carriers need to be aware of any convictions impacting their drivers and whether or not those convictions affect the employee's license status.

Emphasize the Importance of Pre- and Post-trip Inspections

When it comes to preparing for roadside inspections, annual, pre- and post-trip inspections are crucial. These inspections ensure vehicles are in road-ready condition, and can help you and your drivers spot issues before they lead to violations. The following are some best practices when it comes to vehicle inspections:



1. Create a program around pre- and post-trip inspections—Having an internal program in place that requires drivers to perform pre- and post-trip inspections can help address potential safety issues in a timely manner. Employees should be trained on how to conduct a thorough pre- and post-trip inspection as well as how to document one. All new drivers should be trained on inspection protocols. Refresher training should be given to experienced drivers periodically or as needed.



2. Audit your drivers' inspection practices regularly—As a motor carrier, you must ensure inspections are completed accurately and regularly. To do this, it's important to audit inspections. Whether they are done on paper copies or electronically, review all drivers' pre- and post-trip inspections to ensure they are completed to your standards. For drivers with preventable vehicle maintenance violations, consider doing more frequent audits of their inspections. You may also need to retrain these individuals or have them work alongside a mechanic when performing inspections.



3. Perform annual inspections on all of the vehicles in your fleet—All commercial vehicles, including each part of a combo (tractor and trailer), must be inspected by a qualified individual on an annual basis. Additionally, all employees inspecting, performing maintenance on, servicing or repairing brakes must be qualified by the motor carrier.

Implement a Preventive Maintenance Program

Preventive maintenance is any maintenance performed on a schedule used to proactively address common vehicle issues and normal wear and tear. It can include something as simple as oil changes, as well as more complex repairs.

In order for a commercial fleet to avoid violations during vehicle inspections and secure high-performing commercial motor vehicles, business owners should consider utilizing a preventive maintenance program. Preventive maintenance programs establish regular maintenance practices to help prevent costly vehicle breakdowns while ensuring fleet reliability and passenger safety.

A strong preventive maintenance program can help businesses do the following:

- Maintain vehicles to ensure the safety of passengers, operators and the general public.
- Manage maintenance and repair activities to minimize service interruptions due to vehicle or equipment failures.
- Maintain vehicles and equipment to promote cost-efficient operations.
- Reduce vehicle downtime.
- Conduct vehicle operations, repairs and cleaning in compliance with applicable local, state and federal transportation regulations.

Preventive maintenance involves more than routine services. It is a system tailored to your organization's needs that accounts for daily inspections, allows you to give prompt attention to minor repairs, helps track and leverage warranties, and maximizes the reliability of all of your vehicles.

It should be noted that preventive maintenance programs themselves need upkeep if they are to meet your organization's requirements. These programs must be reviewed and adjusted on a regular basis in order to remain effective. Moreover, administrators of preventive maintenance programs should seek input from stakeholders to discover what is, and what is not, working.

As your business continually updates and improves its preventive maintenance program, consider looking to third-party vendors for help. A variety of products and software can help simplify the preventive maintenance process by digitizing records and integrating with tracking applications.

Practice Cargo Securement Fundamentals

When you and your drivers properly secure cargo, it prevents items from shifting, spilling, blowing or falling from the vehicle. Not only does this improve highway safety, but it can also help businesses avoid violations during vehicle inspections and damaged goods during transport, saving carriers both time and money.

Common cargo securement violations issued by the FMCSA include:

- No or improper load securement
- Failing to secure vehicle equipment like tarps, dunnage, doors, tailgates and spare tires
- Leaking, spilling, blowing or falling cargo

- Insufficient, loose or damaged tiedowns

Improper load securement violations can quickly lead to issues during vehicle inspections. However, these kinds of issues are easily avoidable through some basic load securement best practices:

- Match cargos and payloads to vehicle and trailer specifications and capacities. Avoid overloading vehicles. Carriers and their drivers need to be aware of the maximum weight capacity of their vehicles. This is particularly important when you consider that overloading can lead to an increased risk of brake failure.
- Don't stack cargo too high, as this can increase the load's center of gravity and the likelihood of tip-overs. You'll also want to balance out your cargo and ensure that weight is distributed evenly.
- Create procedures that relate to transporting extra wide, long or high cargos. As part of these procedures, you should plan out travel routes to avoid possible obstructions and hazards.
- Emphasize the importance of pre-trip inspections. Drivers should understand policies, procedures and FMCSA regulations related to cargo securement.
- Use specialized cargo securement tools and materials, such as:
 - Dunnage
 - Dunnage bags
 - Tiedowns
 - Wedges

Even if drivers are not securing loads themselves, they need to be trained on the proper procedures. Ultimately, load securement is the responsibility of the driver, and understanding how to do it properly can help them avoid fines or even re-secure loads on the road as needed.

Use ELDs to Meet HOS Rules and Avoid Violations

An ELD synchronizes with a vehicle's engine to automatically log driving time for easier, more accurate HOS recording. They are designed to create a safer work environment for commercial motor vehicle drivers and make it easier and faster for them to track, manage and share RODS data.

ELDs not only reduce HOS issues, but they may also be required. In December 2015, the FMCSA published its [final rule](#) on ELDs, which applies to most motor carriers and drivers who are currently [required](#) to maintain RODS. The rule also applies to commercial buses and trucks as well as Canada- and Mexico-domiciled drivers.

But even if your business is exempt from the ELD rule, implementing them can provide a number of benefits for your fleet and drivers:

- ELDs allow carriers to supplement what has largely been a time-consuming, paper-based logging system. As a result, using ELDs can free up your resources, allowing you to focus on things like route optimization and overall safety.

- ELDs can provide more accurate metrics as they are not as easily falsified or tampered with. What's more, ELDs can provide carriers with a complete telematics package that allows them to track driving behaviors—like hard braking and speeding—that could increase crash, FMCSA violation and insurance risks.
- ELDs can help reduce driver fatigue and violations as they allow carriers to more closely monitor HOS. According to suppliers of ELD technology, installing ELDs can lead to a 40% to 60% reduction in citations for HOS violations.

With the advent of ELDs, the bar has been raised when it comes to HOS compliance. Simply by installing ELDs in all of their vehicles, motor carriers can see a marked decrease in HOS violations. While ELDs are the preferable way to track HOS, not all carriers are required to use them. If you fall under this category and opt to use paper logs, there are some considerations to keep in mind:

- Train drivers on how to complete paper logs—do not assume a driver knows how. Give extra attention to drivers who would otherwise be exempt from maintaining paper logs. These individuals will likely need additional training and may even be unaware of HOS rules altogether. Even if you do use ELDs at your business, training drivers on how to complete paper logs can be beneficial should any devices malfunction. In these instances, drivers would need to know how to reconstruct RODS from scratch.
- Audit your paper logs. Compare the logs to other records, including, but not limited to, gas receipts, toll receipts, customer stops and inspections. Above all, you'll want to check that the distance the driver covered in the documented amount of time seems reasonable. It should be noted that auditing paper logs thoroughly can take time, which is why many carriers exempt from ELD rules still implement ELDs to cut down on administrative time.

Implement a Controlled Substance and Alcohol Testing Program

As an employer, you have a responsibility to implement drug and alcohol testing programs. The primary goal of these programs is to ensure your fleet does not allow a driver to operate a commercial motor vehicle if:



At a minimum, these programs should identify where and when employees will be tested. Again, the FMCSA has very specific requirements as to when drug and alcohol tests must occur. As such, you need to have an understanding of these requirements and ensure your drivers are being tested appropriately at certified testing facilities.

Above all, having a testing program in place ensures tests are administered in accordance with the FMCSA and by certified testing facilities. However, implementing a controlled substances and alcohol misuse program is a significant undertaking. One common method of reducing these challenges and their associated costs is to join a consortium.

A consortium is a group of employers who join together to administer DOT drug and alcohol testing programs. The FMCSA encourages fleets, particularly smaller ones with fewer resources, to join a consortium to lower costs, share expertise and reduce the administrative burden of implementing a testing program.

For more information on forming or joining a consortium as well as specific implementation guidelines related to alcohol and drug regulations, review [this](#) guide from the FMCSA.

Create a Written Policy Related to Controlled Substance and Alcohol Misuse

The FMCSA requires carriers to develop a written policy on controlled substance use and alcohol misuse in the workplace as part of their drug and alcohol program. Carriers must communicate the contents of this policy to their drivers, which, in turn, helps them identify potential controlled substance and alcohol issues within their fleet.

At a minimum, policies should contain:

- A statement outlining the policy's objectives
- Information regarding the effects of alcohol and controlled substances
- An overview of which drivers are subject to testing
- A statement that explicitly states that employee participation is required
- Details regarding when employees must adhere to policy requirements (e.g., while on duty, four hours prior to work or while performing safety-sensitive functions)
- A list of prohibited behaviors and behaviors that constitute as a refusal to submit to a test
- A summary of when testing may occur
- Details regarding testing procedures
- The consequences of failing a test
- The name of an individual who can answer questions related to the policy

The FMCSA also requires carriers to secure a signed statement from each employee, confirming that they have received the policy and understand what's expected of them.

As you develop your policy, consider involving other key members of your organization, like union representatives, medical review officers, SAPs, breath alcohol technicians and screening test technicians. It's also important to review your policy alongside legal representatives, who can help you ensure there are no conflicts between the provisions of your policy and FMCSA, federal, state or local regulations.



CONTINUED SAFETY AND COMPLIANCE

While preparing for roadside inspections is crucial for the continued success of your business, it's just one piece of the puzzle when it comes to managing a commercial fleet. As your trusted advisor and safety partner, we can provide you with a variety of supplemental materials to help address concerns across a range of commercial motor vehicle topics. We can even evaluate your level of risk and recommend insurance solutions to account for your business's greatest exposures. Contact us today to learn more.