

What Is the Safety Management Cycle (SMC)?

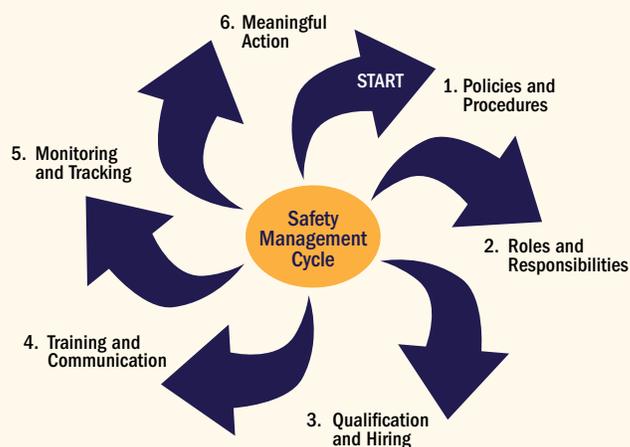
The SMC is a tool used by the Federal Motor Carrier Safety Administration (FMCSA) to help identify and address motor carrier safety and compliance issues. Motor carriers can also use the SMC within their own businesses to determine which of the Safety Management Processes (SMPs) that they may need to improve by looking at the processes, management and controls associated with each SMP.

This document identifies tools motor carriers can use to establish and improve appropriate safety management controls, thereby reducing or eliminating violations. Motor carriers and drivers are reminded, however, that they are ultimately responsible for ensuring compliance with all applicable regulations. For information about the regulations related to the Driver Fitness Behavior Analysis and Safety Improvement Category (BASIC), see the Driver Fitness BASIC factsheet at http://csa.fmcsa.dot.gov/Documents/FMC_CSA_12_006_BASICs_DriverFitness.pdf.

The SMC is used to systematically assess SMPs in six areas:

1. Policies and Procedures, 2. Roles and Responsibilities, 3. Qualification and Hiring, 4. Training and Communication, 5. Monitoring and Tracking, and 6. Meaningful Action. By periodically reviewing each process, there is an opportunity to identify and correct breakdowns in SMPs before safety and compliance issues are identified or crashes occur. The SMC can also be used after safety and compliance issues or crashes have taken place to assist in determining which SMPs need attention.

The SMCs for each BASIC can be found in the Information Center on the SMS Website at <http://ai.fmcsa.dot.gov/sms>.



The Safety Management Cycle, or SMC, consists of the six Safety Management Processes outlined in the graphic above.

Policies and Procedures

- Develop a policy for the periodic review (at least twice per year) of driver qualification files. The motor carrier should not rely on third-party sources, such as insurance agencies. The procedure should include controls to ensure that documents requiring renewals are in place, to remind drivers of expiration dates on medical certificates, so they can schedule another physical examination in advance, and to prevent falsification of documents related to driver qualification.
- Establish a policy requiring drivers to submit copies of all vehicle and roadside inspections and moving violations to carrier management within 24 hours, and to notify management of suspended or revoked Commercial Driver's Licenses (CDLs) immediately following notification of suspension/revocation.
- Establish a policy requiring all new (since 2003) CDL drivers to submit documentation of entry-level driver training in — for example, driver qualification requirements, Hours-of-Service, driver wellness, and whistleblower protection — or to take entry-level training provided by the carrier.

Continued on page 2

- Develop a policy for document retention and recordkeeping, including documents that are to be in the possession of the driver as proof of credentials.
- Develop a process to ensure that operations will always have the proper amount of fit drivers. This process would address how to deal with issues such as sick leave, vacation, training, suspension, and termination.
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, or work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows Driver Fitness Violations.

HAZMAT Carrier Only:

- Establish policies and procedures for managers and dispatchers for companies that haul HAZMAT and regular cargo to ensure that only drivers with an “H” endorsement are assigned placardable HAZMAT; only those with an “N” endorsement, tank loads; only those with an “X” endorsement, combination Tank HAZMAT.

Roles and Responsibilities

- Define and document the role of managers and supervisors for implementing driver fitness policies and for monitoring compliance with them. This should include regular evaluation of the carrier’s driver-wellness program.
- Define and document roles and responsibilities of managers and supervisors in providing training and maintaining qualifications for all employees according to driver fitness regulations and company policies and procedures.
- Ensure that operations managers and dispatchers are responsible for having the proper amount of fit drivers by considering short-term changes, for example, with regard to vacations, variations in sales, and additional driver duties, and long-term changes; for example, with regard to permanent reassignment and termination of employees.
- Ensure that dispatchers and operation managers are responsible for ascertaining that drivers are qualified before authorizing runs.
- Define and document roles and responsibilities of drivers, dispatchers, and other personnel according to driver fitness regulations and company policies and procedures.

Passenger Carrier Only:

- Designate a manager to collect and evaluate all driver-fitness-related customer complaints and their safety implications.

Qualification and Hiring

- Ensure that Motor Vehicle Records (MVRs) from States issuing CDLs are reviewed for driver-fitness-related violations of all prospective drivers for the last three years.
- Ensure that drivers are qualified by querying applicants, checking with previous employers and references, and obtaining necessary documents regarding driver fitness, such as those pertaining to previous violations, CDL, medical qualifications, operational qualifications from training, and relevant experience.
- Review and evaluate gaps in employment, frequent job changes, incomplete applications, within company applications and reassignments, operational limitations such as those pertaining to long-combination vehicles and HAZMAT, physical impairments, and controlled substance and alcohol involvement.

Continued on page 3



- Require that drivers fill out the long form for the medical card and be examined by the carrier's preferred doctor to ensure that their medical qualifications are accurate.
- Ensure that the employment application captures all information required by the Federal Motor Carrier Safety Regulations, such as whether the driver can handle the physical requirements of the job.
- Enhance the recruitment process to identify and attract qualified applicants for the positions of safety director, dispatcher, and driver by using outside resources such as industry affiliations, recruiters, and consultants for employee searches and referrals.

HAZMAT Carrier Only:

- Ensure that drivers can meet physical requirements and are able to handle the additional stress associated with multiple HAZMAT-transportation responsibilities.

Passenger Carrier Only:

- Check the MVR to ensure that drivers have the proper class of license and "P" or "S" endorsement, and to see if the applicable endorsement on the license has a specific restriction, such as an air-brake restriction.

Training and Communication

- Convey expectations to all applicable staff for adhering to driver fitness regulations and company policies and procedures, and for executing responsibilities by providing new-hire and refresher training, and establish communication channels such as newsletters and/or meetings focused on conflicts between driver requirements and current qualifications.
- Ensure that all driver-qualification data, including MVR results, inspections, changes in credentials, and driver-reported violations, are properly communicated to managers, supervisors, and dispatchers to enable them to make appropriate assessments about each driver's fitness.
- Ensure that managers and supervisors regularly communicate and demonstrate their commitment to using only fit and qualified drivers.
- Communicate the carrier's Driver Fitness percentile to all staff, and explain to them individually what they can do to help the carrier improve the percentile.
- Ensure that hiring officials and employees who are responsible for safety have current knowledge, training, and experience regarding driver fitness regulations (both interstate and intrastate where applicable) and interpretations. Train these individuals on successful compliance practices of other companies.
- Train dispatchers and drivers to understand that drivers cannot be assigned a run if illness impairs their ability and/or alertness.
- Ensure that drivers are trained in driver Out-of-Service (OOS) rules, their responsibility in adhering to them, and the carrier's procedures for reporting OOS violations and communicating appropriately with other personnel.
- Provide hiring officials with guidance on how best to attract, screen, and qualify applicants who are most likely to adhere to driver fitness regulations and company policies and procedures.
- Train all staff who are required to monitor and track driver fitness compliance on the appropriate company policies, including those related to discipline and incentives.
- Reinforce training about driver fitness policies, procedures, and responsibilities to drivers, dispatchers, and other employees, using job aids, post-training testing, and/or refresher training. Encourage informal feedback among them so that they can help each other to improve.

Continued on page 4



HAZMAT Carrier Only:

- Ensure that drivers, dispatchers, and managers understand which HAZMAT loads the company is qualified to haul, including when a Hazardous Materials Safety Permit is required; that drivers understand which loads they are qualified to transport; and that dispatchers know which drivers have the proper endorsements and training.

Monitoring and Tracking

- Implement an effective process for monitoring and documenting all drivers' job functions, training, qualifications, renewal dates, disclosed medical conditions, and operational restrictions, including those of drivers on a waiver program or with impairments that may be satisfied by a Skill Performance Evaluation certificate, to ensure that assignments are covered by qualified drivers.
- Review and retain each driver's MVR at least annually to ensure compliance with company policies, Federal regulations, and State and local laws and ordinances related to driver fitness. If a driver seems to have numerous violations, the MVR should be reviewed more often. Random MVR checks in addition to annual checks are also effective. File the MVR in each driver's driver qualification file after review.
- Maintain each driver's investigation history file in a secure location with limited and controlled access for as long as the driver is employed and for three years thereafter.
- Maintain roadside inspection reports, moving violation records, training records, the CDL, the dispatch schedule, bills of lading, and the medical report to help evaluate the performance of all staff involved in qualifying drivers (dispatchers and managers) and the effectiveness of the policies and procedures.
- Implement a system for keeping accurate records of employee driver fitness training needs, such as entry-level and HAZMAT training, and completed training, via software, a checklist in the driver's file, and/or another appropriate method.
- Evaluate personnel who are monitoring driver fitness performance by making sure they are reviewing driver-assignment and qualification files; applying the performance standards fairly, consistently, and equitably; and documenting the evaluations.
- Regularly evaluate the company's driver-fitness-related inspection results via the FMCSA's Website at <http://ai.fmcsa.dot.gov/SMS>. Assess violations for process breakdowns and how to remedy them. Use data to help implement an effective process beyond self-reporting to monitor, document, and evaluate compliance with driver fitness regulations and company policies.
- When monitoring and tracking any driver-fitness-related issue, always assess whether it is individual or represents a systemic breakdown in one of the SMPs (Policies and Procedures, Roles and Responsibilities, etc.).

HAZMAT Carrier Only:

- Ensure that HAZMAT assignments are allocated according to qualification requirements.

Passenger Carrier Only:

- Monitor all drivers who are used on an intermittent basis to ensure that they are medically qualified and have the proper license class and endorsement ("P" or "S").
- Monitor and track driver-fitness-related passenger complaints and assess safety implications.

Continued on page 5



Meaningful Action

- Design and implement incentives and/or recognition programs in order to reward and encourage effective performance related to driver fitness regulations and company policies — for example, bonuses, gift certificates, and/or verbal recognition for no sick days having been taken, physical fitness goals having been met, and no driver fitness violations having been cited.
- Give employees immediate feedback, and require corrective action as soon as the company is aware that driver fitness responsibilities are not being fulfilled.
- Provide required remedial training to human resources employees with driver-qualification monitoring and tracking performance issues that can be addressed by enhancing their knowledge and skills.
- Implement a disciplinary policy where potential disciplinary measures correspond to risk posed, with violations associated with high-consequence accidents or incidents being punished more severely.
- Discipline carrier officials for knowingly and willfully allowing of driver-fitness-related regulations — for example, if management allows an unqualified driver on the road.
- If the problem related to driver qualification is systemic, make adjustments to one or more of the SMPs (Policies and Procedures, Roles and Responsibilities, etc.).

HAZMAT Carrier Only:

- Implement disciplinary measures for dispatchers, managers, drivers, and other appropriate operations personnel who knowingly accept HAZMAT loads without proper qualifications.
- Design and implement incentives and/or recognition programs in order to reward and encourage drivers to help peers meet their HAZMAT training requirements — for example, bonuses, gift certificates, and/or verbal recognition.

