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SAFETY BULLETIN



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Cross Referencing of Data Can Pay Off In a Big Way!

In a world now where we receive more data than ever before, it is important to not only read the data you receive but in certain situations to “cross reference” with other data you already have on file. By “cross referencing” the data you can validate the accuracy of the data in question as well as determine if you indeed have all of the data needed. For those of you who are responsible for compliance with the FMCSA regulations “cross referencing” of data should be a common occurrence in your safety program. Below I have listed some data that “cross referenced”.

1. Pre-Employment Screening Report (PSP) with a CMV drivers Application. The PSP report provides the name of the past employers of a driver who incurred moving violations, roadside inspections and reportable crashes. These employers should have been placed on the application as previous employers by the driver applicant.
www.psp.fmcsa.dot.gov



Idealease and the National Private Truck Council NPTC will again be hosting safety seminars in 2017. The one day seminar this year will focus on the new Electronic Logging Device (ELD) regulation, basic safety and compliance, regulation changes and CSA. The seminars and will be provided to all Idealease customers, potential customers and NPTC members at no charge. The seminar provides important information applicable for both

- Hours of Service records cross referenced to CSA SMS information for accuracy showing a roadside inspection, crashes, moving violations, etc. logged as "On Duty" time on the log.
- Accident Register CFR 390.15 cross referenced with the CSA SMS Crash Basic information to make sure all recordable crashes are logged on the register.
- Moving violations on the CSA SMS with a driver's Certification of Violation form CFR 391.27 required to be completed annually.
- Annual motor vehicle record CFR 391.25 with the Certification of Violation Form CFR 391.27
- Daily Vehicle Inspection Reports DVIR CFR 396.11 with CSA SMS Maintenance Basic violations to see if the driver noted the violation during a pre-post trip inspection on their DVIR.
- CSA SMS inspection information (click on relevant inspections to see all inspections) and compare with copies of roadside inspections provided by your drivers to make sure you have copies of all the inspections in the last 12 months as required by CFR 396.9.
- Supporting documentation such as fuel receipts, toll tickets, GPS records compared to Hours of Service (logs).

the novice and experienced transportation professionals. To register for an upcoming seminar in 2017 click on the following link:

<http://www2.idealease.com/e/36492/safety-seminar-registration/5cm8kv/573845019>

Idealease 2017 Safety Seminar Schedule

Date	Location
September 12	Santa Rosa, CA
October 3	Charlottesville, VA
October 4	Erie, PA



Pre-Employment Screening Program Federal Motor Carrier Safety Administration

Are you using the FMCSA PSP Screening Program?

The Pre-Employment Screening Program (PSP) is a screening tool that allows motor carriers and individual drivers to purchase driving records from the Federal Motor Carrier Safety Administration's (FMCSA) Motor Carrier Management Information System (MCMIS). Records are available for 24 hours a day via the PSP web site. Motor Carriers and drivers can enroll in the PSP program by going to the FMCSA PSP website link:

<http://www2.idealease.com/e/36492/Pages-default.aspx/5cm8kd/573845019>

A driver with other compensated work outside of your employment could have a significant impact on your company's liability exposure and compliance!

A dangerous liability situation that motor carriers can find themselves in is when a driver operating a commercial motor vehicle has another part-time job unbeknownst to the motor carrier. It is not until there is an accident or an on-site compliance review that the motor carrier becomes aware of the situation and finds that the driver is in noncompliance with the hours of service regulations placing the motor carrier in a grave liability situation as

the outside part-time work is compensated. As defined in CFR 395.2 (9) under definition of "On duty time", performing any compensated work for a person who is not a motor carrier.

How does the motor carrier protect itself from this exposure? Consider this. Have all of your drivers sign a statement upon hire indicating that they do not currently have any other employment that they are being compensated for? Also include in the statement that if they incur compensation for any work outside of their employment with your company that they will immediately inform their supervisor and will be required to document the hours on their hours of service documentation, either a grid log or time record as "On Duty" time. Have the driver sign and date the statement and maintain in the driver's qualification file. Click on the following link to see an example of the Driver's Certification of other Compensated Work statement.

<http://www2.idealease.com/e/36492/liance-drivercertification-pdf/5cm8kg/573845019>

FMCSA ELD subject matter experts to answer stakeholder questions

The Federal Motor Carrier Safety Administration (FMCSA) is holding two one-hour question-and-answer webinars in July on its electronic logging device (ELD) final rule.

The sessions will be held:

- Thursday, July 6, 2017, 9:00:00 AM - 10:00:00 AM CDT. To register, click [here](#).
- Thursday, July 13, 2017, 9:00:00 AM - 10:00:00 AM CDT. To register, click [here](#).

The events offer participants the opportunity to pose questions related to ELDs to FMCSA's subject matter experts. Attendees may submit questions in advance of the session via email (ELD@dot.gov) or during the live presentation.

FMCSA is also directing interested parties to a prerecorded [ELD webinar](#) in preparation of the question-and-answer session.

FMCSA withdraws ANPRM on financial responsibility

Public comments did not provide the Federal Motor Carrier Safety Administration (FMCSA) with the necessary data it needed to move forward with rulemaking to revise minimum levels of financial responsibility for motor carriers, freight forwarders, and brokers.

As a result, the agency is withdrawing its advance notice of proposed rulemaking (ANPRM) from November 28, 2014 (79 FR 70839).

FMCSA received a significant number of comments in response to the ANPRM. However, the information received did not provide sufficient cost or benefit data, such as:

- Industry practice with respect to the level of liability limits in excess of the Agency's minimum financial responsibility requirements,
- Cost of such premiums and the frequency of, and
- Amount by which bodily injury and property damage claims exceed policy liability limits.

Anecdotal and hypothetical data provided by commenters left FMCSA unable to perform a systematic cost-benefit analysis in order to justify raising its minimum levels of financial responsibilities.

Entry Level Driver Training (ELDT) Final Rule Is Effective!

Finally, after three delays, the entry-level driver training (ELDT) final rule is effective!

The final rule was published in the Federal Register on December 8, 2016. It mandates the curricula and other requirements that must be followed for training drivers to operate commercial motor vehicles. The driver training rule applies to vehicles that are subject to the commercial driver's license (CDL) regulations.

When a final rule is published, a date – the “effective date” – is specified when it officially becomes part of the Code of Federal Regulations (CFR). In this case, the effective date was delayed three times due to the Trump Administration putting a hold on the rule so that it could be reviewed by the new administration. This hurdle was finally overcome and the final rule became effective on June 5.

The compliance date is February 7, 2020.

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