



NORTH RISK PARTNERS™

DOT Audit Violations: What You Need to Know

November 2019

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Director of Fleet Safety & Compliance Services
Integrated Loss Control, Inc.



Program Overview

- MCS-90 Does it pertain to you?
- Driver Qualification Violations
- Systematic Maintenance Program Violations
- Hours of Service Local and Electronic Log Violations
- Drug and Alcohol Testing Violations.



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Part 387- Insurance MCS 90

- **Freight:**--\$750,000 - \$5,000,000, depending on commodities transported; \$300,000 for non-hazardous freight moved only in vehicles weighing under 10,001 lbs.



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MCS 90

FORM MCS 90 04 17

**ENDORSEMENT FOR
MOTOR CARRIER POLICIES OF RESPONSIBILITY FOR PUBLIC LIABILITY
UNDER SECTIONS 28 and 35 OF THE MOTOR CARRIER ACT OF 1960**

**SCHEDULE OF LIMITS
Public Liability**

Type of Carriage	Commodity Transported	Minimum Insurance
(1) For hire (in interstate or foreign commerce, with a gross vehicle weight rating of 10,000 or more pounds)	Property (nonhazardous)	\$ 750,000
(2) For hire and Private (in interstate, foreign, or interstate commerce, with a gross vehicle weight rating of 10,000 or more pounds)	Hazardous substances, as defined in 49 CFR 171.8 transported in cargo tanks, portable tanks, or transport-type trailers, with capacity in excess of 100,000-gallon gallons, or as listed in Sections 1.1, 1.2, and 1.3 of the Federal Motor Carrier Safety Regulations, Part 171, Subpart C, and as defined in Section 1.1 of the Federal Motor Carrier Safety Regulations, Part 171, Subpart C, and as defined in Section 1.1 of the Federal Motor Carrier Safety Regulations, Part 171, Subpart C	5,000,000
(3) For hire and Private (in interstate or foreign commerce, in any quantity, or in interstate commerce, in bulk only, with a gross vehicle weight rating of 10,000 or more pounds)	Oil listed in 49 CFR 172.101; hazardous waste, hazardous materials, and hazardous substances defined in 49 CFR 171.8 and listed in 49 CFR 172.101, but not mentioned in 172.104 or 172.105	1,000,000
(4) For hire and Private (in interstate or foreign commerce, with a gross vehicle weight rating of 10,000 or more pounds)	Any quantity of Division 1.1, 1.2, or 1.3 material, any quantity of Division 2.3, liquid gases, or Division 1.1, 1.2, or 1.3 material, 1 liquid gas, or Division 1.1, 1.2, or 1.3 material, or Division 2.3 material as defined in 49 CFR 171.8.	5,000,000

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Qualification Files

1. Employment Application/DOT Application
2. Inquiries to Previous Employers Past 3 years
3. Original State Driving Record
4. Driver’s Road Test
5. Medical Exam Certificate (3 Yrs)
6. Medical Waiver (if issued)
7. Verification of National Register
8. Verification of Self Certification
9. Copy of Drivers License (both sides)
10. Annual Driver’s Certification of Violations (Driving Record)
11. Annual Review of Driving Record (3Yrs)
12. Drug & Alcohol Clearinghouse Annual Review

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National Registry Certification

National Registry Certification

MaryLynn Saande
 Doctor of Chiropractic, Doctor, National
 Registry #: 8831007499
 Certification Date: 8/2/2013
 0.7 Miles
 Saande Chiropractic LLC
 Employer: Saande Chiropractic LLC
 1300 Vermillion Street, Hastings , MN, 55033
 651-438-3737 , Fax: 651-438-0046
 Hours of Operation: Monday - Friday 9 to 5
 No Website | Email | Get Directions

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Driver License Search

Driver License Search Results 2/11/2016 8:42:19 AM


DL Number	Class	Type	Class D Status	Commercial Status
N156879858295	A	1	VALID	VALID
Endorsements	Restrictions	DL Issued	DL Expiration	
F X T	NONE	4/1/2014	4/1/2018	
CDL Self Certification	CDL Medical Certificate Status	CDL Medical Certificate Expiration Date	Waiver Expiration Date	
NON-EMPT INTERSTATE	CERTIFIED	2/3/2018	NONE	

Messages 2/11/2016 8:42:19 AM

The information provided is accurate for this day only.
 Pending action and record updates may change status nightly.
 If you need additional information please contact us.

By E-Mail:
ITS.H@nrt.com

By Phone:
 For general driver's license information: (651) 297-3298
 For driver's license revocations and suspensions: (651) 296-2025


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Systematic Maintenance Part 396.3

Vehicle Maintenance File :

- Vehicle ID including company number, make, year, serial number and tire size
- Nature and due date of inspection & maintenance operations to be performed. (Tracking System)
- A record of inspections, repairs & maintenance
- A record of test on push out windows & emergency exists on busses


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Drug and Alcohol

Violations

- Reasonable Suspicion Training Not Complete
- Not testing at the correct random rate (25% Drug 10% Alcohol)
- Post accident testing not being done correctly

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Post Accident Testing-When?

- Fatality
- Injury & Citation
- Disabled Vehicle & Citation
- 8 & 32 hour rules








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Drug & Alcohol Clearinghouse

January 7th 2020 the new Drug and Alcohol Clearinghouse begins.

Join us November 21st for a webinar on how to comply with this new rule.



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Hours of Service Compliance

Local


- Audit to see that you have time slips or cards for hours worked.
- Audit to see that the drivers don't work over 12 hours.
- Make sure drivers are off for a complete 10 hours between work shifts.






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Violations?



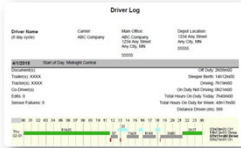
What violations are ELD users receiving for hours of service and falsification violations?




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ELD Violations

- Do you have an ELD or AOBDR system – December deadline is upon us.
- Unassigned miles are required to be accounted for.
- Personal Conveyance misuse.
- Audit for Falsification
- Yard Moves – are they necessary?
- Required Paperwork in Trucks






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Audit process to avoid ELD violations


- Audit
 - Audit against fuel, dispatch records, bills of lading and other supporting documents to see that the correct status is being used.
 - Assign unassigned miles.
 - Audit for personal conveyance misuse.



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What can you do reduce these violations?

- Keep your qualification files organized and complete
- Track your files for any expirations
- Put a tracking program in place to maintain equipment
- Audit your hours of service program
- Train management to know the D&A rules so you can stay compliant

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End of Training

Thank you for your participation



Any Questions?

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