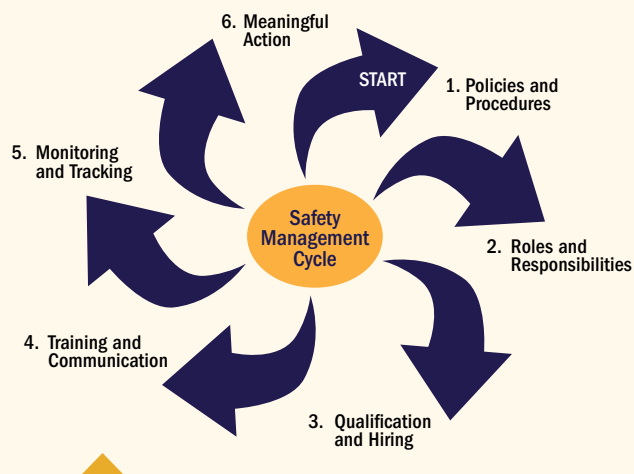## What Is the Safety Management Cycle (SMC)?

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 HOS Compliance Behavior Analysis and Safety Improvement Category (BASIC), see the HOS Compliance BASIC factsheet at **http://csa.fmcsa.dot.gov/Documents/FMC_ CSA_13_004_BASICs_HOS_Compliance.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 and procedure describing how management will monitor and track logs for falsification.
- Establish a policy that prohibits dispatchers from assigning a load to drivers without hours available to complete the load on time.
- Develop a policy stating that drivers should not violate their HOS Out-of-Service (OOS) order under any circumstances, and immediately contact the carrier when a driver is placed OOS.
- Develop a policy requiring drivers to report their available hours to dispatch during "check-in" calls.
- Develop policies and procedures for ensuring proper retention of Records of Duty Status (RODS) according to regulations.
- Establish a policy requiring drivers to submit copies of all roadside inspections to carrier management within 24 hours.

- Develop a policy stating that drivers are required to submit all RODS and supporting documentation, such as expense receipts, within 13 days of the end of the trip.
- Establish a policy stating that drivers are required to check with their supervisor, manager, or dispatcher to review their "fit-for-duty" status before starting a job, and that drivers who are ill to the extent that their ability and/or alertness is impaired are prohibited from working on safety-sensitive assignments.
- 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 HOS Violations.

HAZMAT Carrier Only:

- Develop a clearly written policy and procedures for all personnel involved in accepting loads, assigning drivers, and establishing delivery schedules, taking into account the full operational process and enabling dispatchers to safely manage all types of HAZMAT loads for which the carrier is qualified within HOS.

Passenger Carrier Only:

- Develop a policy that discourages long-distance trips that depart at night and outlines acceptable route scheduling procedures.
- Develop a policy that prohibits drivers from deviating from stated itineraries without appropriate management approval, and advise customers of this policy.
- Establish a policy to ensure that drivers enter all compensated time, including time spent working for a non-motor carrier, on their RODS or prior seven-day duty statement.
- Develop a dispatch policy that discourages use of drivers who have worked various hourly shifts prior to any long-distance trips.

Roles and Responsibilities

- Define and document roles and responsibilities of managers and supervisors for monitoring compliance with HOS policies.
- Ensure that managers are responsible for reviewing RODS for accuracy and for disciplining those who falsify their logs.
- Assign responsibility for making sure that all RODS are collected and stored for six months.
- Prior to accepting shipments, ensure that dispatchers are responsible for mapping out routes, asking drivers how many hours they have driven recently, and verifying that the route can be completed without breaking HOS regulations.
- Ensure that drivers are responsible for informing the carrier when they are sick, keeping accurate RODS, and planning their route so that it can be completed efficiently within HOS rules.
- Define and document roles and responsibilities of drivers and dispatchers as they pertain to HOS policies and procedures.

HAZMAT Carrier Only:

- Ensure that managers and dispatchers ascertain that drivers who may already be stressed for time due to non-driving HAZMAT responsibilities are not overburdened.

Passenger Carrier Only:

· Define and document responsibilities for verifying that HOS and available hours for separate operations within company are accounted for, including part-time, intermittent, and relief drivers, and for "extended day."

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

Qualification and Hiring

· Ensure that prospective drivers have a history of driving within HOS regulations by querying applicants, checking with previous employers and references, and obtaining necessary documents regarding HOS Violations going back three years. Create a detailed written record of each inquiry.

· Ensure that whoever is responsible for monitoring and tracking HOS knows the relevant regulations, how the carrier/dispatcher operates, the company's disciplinary policy and procedures, and how to use supporting documents such as toll and fuel receipts to see if data are accurate.

· Ensure that dispatchers have good planning, communication, and simple mathematical skills.

· Ensure that drivers have sufficient planning skills to know when they should be driving and stopping, basic mathematical skills to calculate their hours and miles, and good organizational skills to keep each RODS up-to-date continuously by adding information at every stop.

· Ensure that there are enough people to review HOS data for all drivers, or invest in Electronic Onboard Recorders (EOBRs) for continuous, real-time review.

· Enhance the recruitment process to identify and attract qualified applicants for the positions of safety director, driver, and dispatcher, using outside resources such as industry affiliations, recruiters, and consultants for employee searches and referrals.

HAZMAT Carrier Only:

· When querying applicants and previous employers for HAZMAT handling positions, explore whether any fatigue-related violations resulted from physical demands or stress.

· Carefully plan recruitment and hiring of seasonal and part-time HAZMAT drivers to meet demands without exceeding HOS limitations.

Passenger Carrier Only:

· When hiring part-time or intermittent drivers with concurrent employment, verify current and recent RODS as well as prior HOS Violations.

Training and Communication

· Convey expectations to all applicable staff for adhering to HOS 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 scheduling and HOS rules.

· Inform drivers that management will be monitoring and tracking RODS.

· Ensure that managers and dispatchers encourage fatigued drivers to pull over and take a nap.

· Communicate the carrier's HOS Compliance percentile to all staff, and explain to them individually what they can do to help the carrier improve the percentile.

- Ensure that managers and supervisors communicate their ongoing commitment to abiding by HOS regulations and to not driving when fatigued for any reason, including illness.
- Ensure that all staff (drivers, dispatchers, sales) involved in the HOS process receives training as required by regulations and/or company policies.
- Train managers, supervisors, and dispatchers on how to track and communicate drivers' HOS, including checking the prior seven-day duty statement for intermittent drivers.
- Train the safety director and dispatchers on how to schedule routes that can be completed within HOS regulations.
- Train dispatchers and drivers to understand that drivers cannot be assigned a run if illness impairs their ability and/or alertness.
- Train all staff who are required to monitor and track HOS on appropriate company policies, including those related to discipline and incentives.
- Provide training/testing program to current drivers on proper log completion, how to achieve proper rest on trips by instructing them on the difference between on-duty not driving—for example a driver waits while trailer is loaded— and off-duty, and the importance of proper rest between shifts.
- Train drivers on the proper use of sleeper berths, including the correct procedure for entering time spent in a berth as a co-driver on the driver's RODS.
- Ensure that drivers are trained in driver OOS rules, their responsibilities in adhering to those rules, 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 HOS regulations and company policies and procedures.
- Reinforce training about HOS 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.

Monitoring and Tracking

- Implement an effective process for monitoring, tracking, and evaluating all drivers' compliance with HOS regulations and company policies.
- Promptly review all RODS for HOS Violations and falsification. Look for discrepancies by comparing driver logs with their "check-in" calls and other supporting documents.
- Document all findings of fatigue-related noncompliance with regulations and/or company policies.
- Systematically check to see if drivers and dispatchers are regularly communicating about HOS availability and driver-fatigue level.
- Maintain roadside inspection, RODS, supporting documents, dispatch schedules, and communication records to help evaluate the performance of all staff (drivers, dispatchers, and managers) involved in HOS and the effectiveness of compliance with HOS policies, procedures, and regulations.
- Regularly evaluate the company's fatigue-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.
- Implement a system for keeping accurate records of employees' HOS training needs and completed training, via software, a checklist in the driver's file, and/or another appropriate method.

- Evaluate personnel (log clerks, payroll, dispatchers, and third-party safety consultants) who are monitoring drivers' RODS for accuracy; for whether they are applying performance standards fairly, consistently, and equitably; and for whether they are documenting evaluations.
- Consider using EOBRs to monitor and track HOS Violations.
- When monitoring and tracking any fatigue-related issues, always assess whether an issue is individual or represents a systemic breakdown in the SMPs (Policies and Procedures, Roles and Responsibilities, etc.).

Passenger Carrier Only:

- Monitor and track driver-fatigue-related passenger complaints and assess safety implications.
- Ensure that management ascertains that available hours account for rest periods, separate operations within-company, intermittent and relief drivers, and changes to itinerary that require "extended day." Check in with drivers at predesignated intervals.

Meaningful Action

- Design and implement incentives and/or recognition programs in order to reward and encourage effective performance related to compliance with HOS regulations and company policy—for example, bonuses, gift certificates, and/or verbal recognition for on-time completion of accurate RODS.
- Reward dispatchers, terminal managers, and safety directors for having a low percentage of runs without fatigued-driving violations. Do not use on-time delivery incentives, which could encourage drivers to exceed HOS.
- Give employees immediate feedback, and require corrective action as soon as the company is aware that fatigued-driving-related issues, such as HOS, are not being addressed.
- Provide required remedial training to employees with HOS-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 violations of HOS-related regulations, such as falsifying RODS.
- If a problem related to fatigue is systemic, make adjustments to one or more of the SMPs (Policies and Procedures, Roles and Responsibilities, etc.).