CARRIER

# DRIVER CHECKLIST FOR ROADSIDE INSPECTIONS

As the driver, you're on the front line of a roadside inspection and your level of preparedness directly impacts the success of the inspection. Being courteous, following instructions, making eye contact, and answering questions truthfully go a long way to expediting the inspection process and getting back on the road.

#### **Avoid Unnecessary Inspections**

You cannot control whether you're selected by ISS for an inspection, but you can ensure that there are no visible violations that would give cause for an enforcement officer to conduct a roadside inspection.

- □ Conduct thorough pre-trip inspections and address any identified defects before operating the vehicle.
- Conduct thorough post-trip inspections and use the DVIR process to make sure the company is aware of and addresses any defects.
- ☐ Make sure the company name and DOT number remain visible and readable.
- Drive defensively and in compliance with the traffic regulations.

#### **The Early Inspection Phase**

- □ Follow the officer's instructions and move to the inspection location requested.
- Remain reasonably still in the cab until the officer provides further instructions.

#### **The Interview Phase**

- Never operate when ill or fatigued, or after using any drugs or alcohol.
- Be professional, polite, and courteous during the greeting and interview.
- Answer the officer's questions truthfully. During the course of the inspection, the officer will catch on to any inconsistencies or untruths told during the interview.

#### **Driver Document Check**

- Always have your license and medical card in your possession (if you're a non-CDL driver).
- ☐ Know the location of the company and vehicle credentials.

#### **Driver Credential Check**

- ☐ Keep your license and medical card valid at all times. Renew licenses and medical cards before they expire and submit your medical information to the state when required.
- □ Notify the company if a credential has expired or is lost, revoked, suspended, etc.

#### **Hours of Service Check**

□ Never disconnect an ELD or tamper with the device or the data it collects.

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Log in and out of the ELD at the appropriate time, enter information when required, make duty changes when required, and log on-duty activities as on-duty time. Use the device as recommended by the manufacturer and company. During the pre-trip inspection, verify that the following are in the vehicle (these can be electronic): • The ELD user's manual, The ELD data transfer instruction sheet, Instructions to be followed in case of a malfunction, and • Eight blank paper logs. Be prepared in case of an ELD malfunction: Immediately notify the company. • Immediately reconstruct the current and previous seven days' logs. • Retain a copy of the notification provided to the company. • Secure a copy of the extension letter if the device has been malfunctioning for more than eight days. Use the special driving category only when the situation clearly matches the requirements for use. □ Make edits only to correct errors and omissions, and include a comment clearly explaining the reason for the edit. Set the device to the roadside inspection mode and display logs to the officer when requested. Transfer the log data to the officer using the agreed upon transfer method when requested. □ Place a comment (annotation) on the log anytime a limit is exceeded, explaining the situation and if applicable, what exemption was used. ☐ If using paper logs, keep the log current and accurate.  $\Box$  If using time records, explain that to the officer. Answer the officer's questions truthfully. **DVIR Check** Conduct daily driver inspections and address any defects as soon as they are discovered. Record a vehicle defect at the end of the day and immediately submit the DVIR. Look for any outstanding DVIRs when conducting a pre-trip. The location of DVIRs are determined by the carrier and should be known by all drivers.

#### **Annual Inspection Check**

- ☐ Know the location of the proof of annual inspection.
- Check the annual inspection date as part of full vehicle inspections.

#### **Avoid Vehicle Violations**

- Conduct a thorough pre-trip inspection before operating the vehicle.
- Conduct walkaround inspections anytime the vehicle is parked.
- ☐ Immediately report to the company any defects discovered during an inspection.

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# CARRIER CHECKLIST FOR ROADSIDE INSPECTIONS

While drivers are on the front line of a roadside inspection, carrier support and due diligence goes a long way to make their engagement with enforcement a more efficient experience. Use this checklist to identify gaps in compliance as well as opportunities for process improvements that can help reduce the risk of violations and OOS events.

#### **Avoid Unnecessary Inspections**

- Have a maintenance program that ensures only well-maintained, safe, and compliant vehicles are on the road.
- Clearly mark all vehicles with the company name and DOT number.
- □ Train drivers on safe and defensive driving.
- □ Take steps necessary to maintain low CSA BASIC scores, thereby receiving a "Pass" recommendation in ISS.
- Use systems that help prevent accidents.

#### **The Early Inspection Phase**

- Ensure drivers understand the officer's expectations and actions when he or she selects the inspection location.
- ☐ Make sure drivers know what the officer is looking for during his or her approach to the cab, and what not to do when the officer approaches the door.

#### **The Interview Phase**

□ Carriers should ensure that drivers understand the officer's questions are intended to gather basic information that will be verified later in the inspection (in particular, during the hours-of-service check).

#### **Driver Document Check**

Ensure drivers know what carrier they are working for and what they are hauling.



- □ Ensure all vehicle and company credentials (registration, fuel permits, hazardous materials registration, etc.) are current and in the vehicles. This should be checked during routine vehicle service.
- Ensure all of the vehicle documentation is in a common location that is known to the drivers.

#### **Driver Credential Check**

- ☐ Make sure the driver has all the required carrier credentials (DOT number, for-hire authority, UCR).
- Ensure that a process is in place to notify the company when it is time to renew a credential.

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## CARRIER CHECKLIST FOR ROADSIDE INSPECTIONS (CONT.)

- Have a method for determining which drivers can operate what vehicles, and ensure that drivers are assigned only to vehicles they are qualified to operate.
- Have a mechanism in place that notifies the company when a driver qualification credential is lost or coming due for renewal.
- Run an MVR on all CDL drivers within 15 days of a medical exam to verify that the new medical information is on the driver's MVR.

#### **Hours of Service Check**

- □ Train drivers on:
  - How to use the ELD during daily operations and determine when it is malfunctioning.
  - The process for displaying ELD logs.
  - How to transfer their logs to the officer.
  - When required entries must be made.
  - The process for accepting or rejecting unassigned driving time.

Make sure the ELDs display all required information when set to the Roadside Inspection Mode.

- Have a procedure in place to assist drivers with reconstructing the current and previous seven days logs when an ELD malfunctions.
- Have a procedure for applying for an extension with FMCSA if a malfunctioning device cannot be replaced within eight days.
- Audit ELD records:
  - To make sure there are no jumps in location, mileages, or engine hours. If jumps are found, a determination on why they occurred should be made and addressed with the driver.
  - For over-hours violations, and counsel drivers to stop future violations.
  - For falsification by investigating:
    - Unassigned driving time,
    - Use of special driver categories,
    - All edits, and
    - The driver's use of off duty.

#### Audit paper logs:

- To verify the driver's use of paper logs was acceptable;
- For missing entries;
- For violations of the hours-of-service limits; and
- For falsification by:
  - Verifying the miles between all points mentioned on the log,
  - Verifying the log is accurate by comparing it to supporting documents, and
  - Verifying that on-duty activities are logged on duty.
- ☐ If a driver is using a mobile app in place of paper logs, ensure the driver can print the logs in the vehicle.





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## CARRIER CHECKLIST FOR ROADSIDE INSPECTIONS (CONT.)

#### **DVIR Check**

- □ Train drivers on the DVIR process:
  - Conducting post-trip inspections.
  - Completing DVIRs.
  - Looking for partially completed DVIRs during the pre-trip.
- Have a process in place for immediately receiving DVIRs with defects.
- ☐ Train maintenance personnel on the DVIR process:
  - Review, repair or comment.
  - Sign the DVIR and route to the next driver to use the vehicle.
- Address any defects listed on a DVIR before the vehicle is operated again.

#### **Annual Inspection Check**

- Use a program that tracks the due dates for all annual inspections.
- Have a policy of not using any vehicle that does not have a current annual inspection.
- Have a list of road service companies that can conduct annual inspections on trailers that did not get inspected in time.
- Check annual inspection due dates during all maintenance activities.
- □ Train drivers on the proof of annual inspection requirements, what proof is carried, and where it is located.

#### **Avoid Vehicle Violations**

- Have an effective preventive maintenance program.
- ☐ Make sure all vehicles are at the maintenance facility for service when scheduled.
- Routinely inspect any available vehicles located at the company facility.
- □ Train drivers on vehicle inspections.
- Have tracking programs in place to identify drivers that may not be conducting thorough inspections.



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# MAINTENANCE SHOP

When it comes to a roadside inspection, the enforcement officer will be doing the same thing that you, as the mechanic, should be doing when it comes to inspecting the vehicle.

A maintenance inspection should include a check of obvious components, such as lights and wipers, as well as hard-to-see components that drivers overlook or cannot check. An exhaustive inspection of the equipment should be conducted regularly. The key to success is to ensure that when the vehicle goes on the road, it's 100 percent compliant and safe.

Check all lights for function and address any light-related complaints from drivers.

- Gauge and measure the tread depth on all tires. Repair or replace any tire with a defect or that has been reported as having a defect by the driver.
- Check all brake lines on the vehicle for rubbing and damage.
- Check the brake components at each wheel end, including:
  - Brake lines: Look at line conditions, connections, rubbing, etc.
  - Brake chamber (or brake cylinder if the vehicle has hydraulic brakes): Look at the condition, mounting, and connections, and check for evidence of leakage.
  - **Connecting hardware:** Look at all that is applicable, including pushrod, clevis, pins, slack adjuster, S-cam and bushings, mounting "spider," rollers, shoes, linings, and drum. Look at the condition, mounting, connections, presence of locking pins, etc.

□ Check the brake adjustment on all wheels.

Check the frame for cracks, damage, loose fasteners, and other problems.

□ Check all of the driveline components, such as the transmission, differentials, yokes, u-joints, driveshafts, retainers, etc., for any damage, looseness, or excessive wear.

- Conduct a full brake system check, which includes:
  - Leaks: Chock the wheel and release the parking brakes. Apply the service brakes and turn the engine off. Watch the gauge and listen for any air leaks. If a leak is present, locate and repair it.
  - **Air warning:** Turn the key on and pump the brake down until the low-air warning light activates. The light should activate by 60 psi.

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DRIVER

## MAINTENANCE SHOP CHECKLIST (CONT.)

- **Button pop out:** Pump the brakes until the parking and trailer supply button pops out. Close the tractor protection valve and activate the spring brakes, which are acting as the emergency brakes in this case.
- **Parking/emergency brakes:** With the button still out and chocks removed, attempt to move the vehicle by placing it in the lowest gear and trying to ease it forward. With a tractor-trailer, once air pressure has returned to normal, also check the tractor and trailer separately by applying the parking brakes to one unit while the other is released.
- **Service brakes:** Release all parking brakes and make sure the vehicle rolls freely. Apply the service brakes when five miles per hour is reached and then release the brakes. This should allow the vehicle to roll freely.
- **ABS key on check:** Turn the vehicle off for 30 to 60 seconds. Turn the key on and verify the ABS warning lights on the vehicle activate and then turn off. This indicates the warning lights are working and the self-check was passed.

☐ If the vehicle has hydraulic brakes, conduct the following inspections:

- **Leaks:** Pump the brake pedal three times and keep the brakes applied. After the third pump, the pedal should not "fade", remaining firm and in place.
- Warning: Turn the key on and verify that the brake warning light is not on.
- **Power assist backup:** If the vehicle is equipped with a power brake assist unit, verify that the backup motor is activated when the key is turned on.
- **Parking brake:** Apply the parking brake, if not already applied, and attempt to move the vehicle by placing it in the lowest gear and easing forward.
- Service brakes: Release all parking brakes and make sure the vehicle rolls freely (brakes all released). Apply the service brakes when five miles per hour is reached and release the brakes, verifying the service brakes release and the vehicle once again rolls freely.
- **ABS "key on" check:** Turn the vehicle off for 30 to 60 seconds. Turn the key on and verify the ABS warning lights on the vehicle activate and then turn off. This indicates the warning lights are working and the self-check was passed.

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