**CSA**
Compliance ★ Safety ★ Accountability

## 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 Vehicle Maintenance Behavior Analysis and Safety Improvement Category (BASIC), see the Vehicle Maintenance BASIC factsheet at **https://csa.fmcsa. dot.gov/Documents/FMC_CSA_12_009_BASICs_VehMaint.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**.
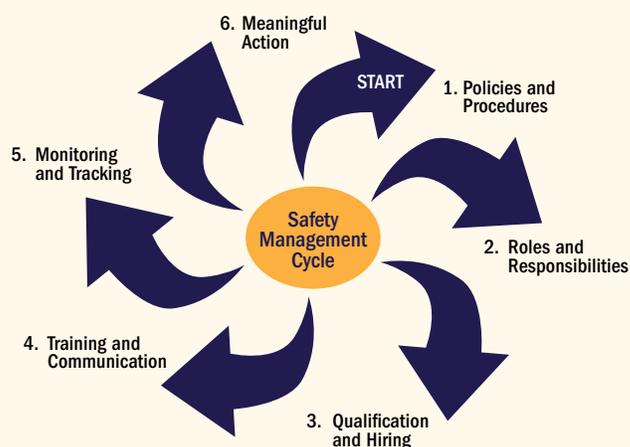


*The Safety Management Cycle, or SMC, consists of the six Safety Management Processes outlined in the graphic above.*

## Policies and Procedures

· Establish a policy requiring all drivers to submit copies of all roadside inspections to carrier management within 24 hours.

· Establish a policy for employee completion of annual training on cargo handling, loading, and securement.

· Develop a policy that details driver procedures for load-limit verification, loading/unloading, securement, and en-route inspections. The policy should address steps to be taken when the shipper will not allow the driver to check out the load—for example, if the driver is not allowed on the shipper's property and containers are sealed.

· Develop policies and procedures ensuring that purchasing agents supply, verify, and communicate requirements for adequate securement devices, equipment, and spare parts.

· Develop a policy for appropriate personnel to set accurate expectations with customers about the time needed to ensure the integrity of the cargo, and establish procedures for handling unmet expectations.

· 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 cargo-securement violations.

### Passenger Carrier Only:

- Establish a policy to ensure that emergency exits and aisles are accessible and free from blockages at all times while passengers are being transported.
- Establish procedures for handling, loading, and securing oxygen canisters in accordance with Federal Motor Carrier Safety Regulations (FMCSRs) and Pipeline and Hazardous Materials Safety Administration regulations.

## Roles and Responsibilities

- Define and document roles and responsibilities of managers and supervisors for implementing cargo handling, loading, and securement policies and for monitoring compliance with them.
- Establish roles and responsibilities of managers and experienced drivers for performing ad-hoc oversight and instruction of newer drivers and purchasing/parts inventory agents.
- Define and document roles and responsibilities of drivers, dispatchers, managers, mechanics, technicians, and purchasing/parts inventory agents in relation to cargo handling, loading, and securing regulations and company policies and procedures.

### Passenger Carrier Only:

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

## Qualification and Hiring

- Ensure that drivers are qualified for cargo handling, loading, and securement tasks by querying applicants, checking with previous employers and references, and obtaining necessary documents regarding cargo loading and securement violations, qualifications, training, and work experience. Create a detailed written record of each inquiry.
- Ensure that the employment application captures all information required by the FMCSRs, such as types of cargo that applicants have handled, loaded, and secured and types of vehicles that they have operated.
- Enhance the recruitment process to identify and attract qualified applicants for the positions of safety director and driver by using outside resources, such as insurance companies, industry groups, and consultants, for employee searches and referrals.

## Training and Communication

- Convey expectations to all applicable staff for adhering to cargo handling, loading, and securement 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 handling, loading, and securement requirements and schedule or resources.
- Communicate the carrier's Vehicle Maintenance BASIC percentile to all staff, and explain to them individually what they can do to help  improve compliance.
- Ensure that managers and supervisors regularly communicate and demonstrate their commitment to proper cargo handling, loading, and securement.

- Train drivers on procedures for load-limit verification, loading/unloading, securement, and en-route inspections. The training should address steps to be taken when the shipper will not allow the driver to check out the load—for example, if the driver is not allowed on the shipper's property and containers are sealed.
- Implement a training/testing program that includes hands-on demonstration. Create opportunities for individual instruction and coaching as appropriate, focusing on identified problem areas.
- Ensure that drivers are trained in vehicle out-of-service (OOS) rules, their responsibilities to adhering to those rules, and the carrier's procedures for reporting OOS violations and communicating appropriately with other personnel.
- Train all staff who are required to monitor and track cargo handling, loading, and securement on the appropriate company policies, including those related to discipline and incentives.
- Provide hiring officials with guidance on how best to attract, screen, and qualify applicants who are most likely to adhere to cargo handling, loading, and securement regulations and company policies and procedures.
- Reinforce training on cargo handling, loading, and securement policies, procedures, and responsibilities to drivers and other employees, using job aids, post-training testing, and/or refresher training. Encourage informal feedback among drivers so that they can help each other to improve.

## Monitoring and Tracking

- Maintain roadside inspection reports, observational reports, Driver Vehicle Inspection Reports and customer complaints on condition of cargo to help evaluate the performance of all staff (drivers, dispatchers, managers, mechanics, technicians, and purchasing/parts inventory agents) involved in cargo handling, loading, and securement and the effectiveness of compliance with associated policies, procedures, and regulations.
- Implement a system for keeping accurate records of employee cargo handling, loading, and securement training needs and completed training, via software, a checklist in the driver's file, and/or another appropriate method.
- Regularly evaluate the company's cargo handling-, loading-, and securement-related inspection results via FMCSA's Website at **http://ai.fmcsa.dot.gov/SMS**. Assess violations for process breakdowns and how to remedy them.
- Evaluate personnel who are monitoring drivers' cargo handling, loading, and securement performance by making sure they are using inspection and other data; applying performance standards fairly, consistently, and equitably; and documenting evaluations.
- Implement an effective process for monitoring and documenting the compliance of all relevant staff with cargo handling, loading, and securement regulations and company policy for addressing complaints of shippers and receivers.
- Regularly review cargo handling, loading, and securement methods, procedures, equipment, and devices used, and evaluate opportunities for new methods.
- When monitoring and tracking any cargo handling-, loading-, or securement-related issues, always assess whether the issue is individual or represents a systemic breakdown in one of the SMPs (Policies and Procedures, Roles and Responsibilities, etc.).

### Passenger Carrier Only:

- Monitor and track passenger complaints regarding baggage/freight restriction of driver operations, obstruction of exits, and lack of protection from baggage falling on passengers, and assess safety implications.

## Meaningful Action

- Design and implement incentives and/or recognition programs as a way of rewarding and encouraging effective performance of cargo handling, loading, and securement responsibilities—for example, bonuses, gift certificates, and/or verbal recognition for lack of violations and OOS orders in cargo securement from roadside inspections.

- Give employees immediate feedback, and require corrective action as soon as the company becomes aware that cargo handling, loading, and securement responsibilities are not being fulfilled.

- Provide required remedial training to employees with cargo handling, loading, and securement 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 cargo handling-, loading-, and securement-related regulations—for example, if management allowed a driver to use a truck with an unsecure load.

- Provide disciplinary action for damaged cargo having been accepted without prior approval and documentation.

- If the problem related to cargo handling, loading, or securement is systemic, make adjustments to one or more of the SMPs (Policies and Procedures, Roles and Responsibilities, etc.).