

EHS CONCEPTS

OUT OF SERVICE

What put trucks and drivers out of service in CVSA's 2026
International Roadcheck, and the fleet leader's fix list for each.
A free field guide.

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Keep your people whole.

FROM RYAN

Parked on the shoulder

The examples in this letter (the brake chamber, the tire, the medical card, the 5 a.m. dispatch) are composites to show the pattern, not reports of real events.

The driver did a walk-around at 5 a.m. in the dark, with a dispatcher texting him to roll. He did not hear the air leak at the rear axle. He did not see the tire wearing through on the inside. His medical card expired three weeks ago, and nobody in the office was tracking it. At a scale house two hours later, an inspector put the truck and the driver out of service. The load sat. The customer called. The fleet paid for a tow and a second driver.

That was a good day. The bad version of that day ends in a crash. In 2024, roadway incidents killed 1,146 U.S. workers, and transportation and material moving occupations had more work deaths than any other occupation group (BLS).

Every May, inspectors across North America run CVSA's International Roadcheck: three days, tens of thousands of inspections, and a public scorecard. In 2026 (May 12–14) they did 54,575 inspections and put 10,350 vehicles and 3,184 drivers out of service. Brakes led the vehicle list again. A missing medical card jumped to No. 1 on the driver list, more than doubling from 493 in 2025 to 1,072.

This guide takes the seven violations that drove the 2026 results. For each one you get the pain point, what the data says, the root causes, the rules in plain words with tags, controls in hierarchy order, a printable self-audit, who owns what, and one question to start a toolbox talk.

If you run even one truck of 10,001 pounds or more (GVWR, GCWR, or actual weight) across state lines, you are a motor carrier, and these rules are yours. Start with the item your last roadside inspection or your own shop would flag first.

Ryan L. Rinehart

Founder, EHS Concepts — The Ways of Safety

Keep your people whole.



THE VERIFIED NUMBERS

CVSA International Roadcheck, May 12–14, 2026

54,575

Inspections of commercial vehicles and drivers in three days across the U.S., Canada, and Mexico (about 13 vehicles a minute)

23.5%

Vehicles placed out of service in vehicle inspections (10,350 of 44,047 Level I, II, and V inspections)

39.1%

Share of the 13,924 vehicle out-of-service violations that were brake-related (5,451: brake systems plus 20% defective brakes)

1,072

Drivers' out-of-service violations for no medical card, the No. 1 driver violation at 27%, up from 493 in 2025 (about 2.2x)*

3,184

Drivers placed out of service, 6% of 53,271 driver inspections (Level I, II, and III)

17,680

CVSA decals placed on U.S. and Canadian vehicles that passed with no critical inspection item violations

Source: Commercial Vehicle Safety Alliance (CVSA), "CVSA Releases 2026 International Roadcheck Results" (Aug. 25, 2026), and the 2025 results release (Oct. 7, 2025) for comparison. Roadcheck is a three-day enforcement and data-gathering blitz, not a random sample; inspectors choose which vehicles to inspect, so rates are not national averages. Percentages are CVSA's: vehicle violation shares are of all vehicle out-of-service violations, driver shares of all driver out-of-service violations (U.S. and Canada). CVSA reports the vehicle out-of-service rate as 23.5% of vehicle inspections and 19% of all inspections. * Rows marked with an asterisk are EHS Concepts calculations from the published figures.

The seven out-of-service violations in this guide

	VIOLATION	2026 OUT-OF-SERVICE VIOLATIONS AND SHARE	2025 FOR COMPARISON
1	Brakes (brake systems and 20% defective brakes)	5,451 · 39.1% (systems 3,379, No. 1; 20% defective 2,072, No. 3)	5,561 · 41.1%
2	Tires	2,914 · 20.9% (No. 2 vehicle)	2,899 · 21.4%
3	Cargo securement (2026 focus)	1,724 · 12.4% (No. 4 vehicle)	1,549 · 11.4%
4	Lights	1,659 · 11.9% (No. 5 vehicle)	1,737 · 12.8%
5	No medical card	1,072 · 27.0% (No. 1 driver)	493 · 14.9% (No. 3)
6	Hours of service, false logs, ELD tampering (2026 focus)	929 · 23.4% (No. 2); false logs 266 · 6.7%; ELD tampering 146 · 3.7%	Hours 1,076 · 32.4% (No. 1); false logs 332 · 10.0%
7	No CDL and English proficiency	No CDL 620 · 15.6% (No. 3); English proficiency 361 · 9.1% (No. 4)	No CDL 810 · 24.4%; English proficiency was not out-of-service criteria

Counts and shares are CVSA's for North America (driver figures are U.S. and Canada only). Vehicle shares are of 13,924 vehicle out-of-service violations; driver shares of 3,969 driver out-of-service violations. The two years are separate three-day snapshots; changes reflect enforcement focus and criteria changes as well as fleet condition.

BEFORE THE SEVEN VIOLATIONS

The five basics that sit under all seven

<u>49 CFR 390.5</u> Are you a motor carrier? · FMCSA · final	A commercial motor vehicle in interstate commerce is 10,001 lb or more (GVWR, GCWR, or actual weight), or carries more than 8 passengers for pay or more than 15 not for pay, or carries placarded hazmat. A contractor's pickup and trailer can qualify.
<u>49 CFR 396.3 and 396.7</u> Inspection, repair, maintenance · FMCSA · final	Systematically inspect, repair, and maintain every vehicle you control, keep records, and do not operate a vehicle in a condition likely to cause a crash or breakdown.
<u>49 CFR 392.7 and 396.13</u> Driver inspection · FMCSA · final	Before driving, the driver must be satisfied that brakes, steering, lights, tires, horn, wipers, mirrors, coupling devices, and emergency equipment are in good working order.
<u>49 CFR 391.51</u> Driver qualification files · FMCSA · final	Keep a qualification file for each driver: application, motor vehicle record, road test or equivalent, and proof of medical certification, among other items.
<u>CVSA out-of-service criteria</u> Enforcement criteria · CVSA · final	CVSA's North American Standard Out-of-Service Criteria are updated every April 1. Roadcheck focus areas are announced before each event. Know what puts a vehicle or driver out of service before an inspector shows you.

Tags: FMCSA = Federal Motor Carrier Safety Regulations for commercial motor vehicles, drivers, and carriers (49 CFR 382–399). HM = hazardous materials rules (49 CFR 171–180). CVSA = North American Standard Out-of-Service Criteria, the enforcement criteria inspectors use to take a vehicle or driver off the road; they are not a regulation, but the violation behind them is. GI = OSHA general industry (29 CFR 1910). STATE = one state's rule; intrastate carriers follow state rules, which usually adopt most FMCSA rules. GUIDANCE = advisory; it is not a rule and cannot be cited by itself.

Ten-minute foundation check

#	CHECK	YES	NO
1	We know which of our vehicles are commercial motor vehicles and which drivers need a CDL.	☐	☐
2	We have a USDOT number and our registration (MCS-150) information is current.	☐	☐
3	Every vehicle has a written maintenance schedule and records we could show today.	☐	☐
4	Pre-trip inspections take real time, and dispatch does not rush them.	☐	☐
5	Defects drivers report are fixed, or certified as not needing repair, before the vehicle runs again.	☐	☐
6	Every driver has a complete qualification file, including current medical certification.	☐	☐
7	We review our roadside inspection results and safety scores at least monthly.	☐	☐
8	Someone with authority can pull a truck or driver off the road without asking twice.	☐	☐

HOW TO USE THIS GUIDE

Walk it. Score it. Own it.

1. Start with the violation your last roadside inspections or your own shop records show most, not the one at the top of this guide.
2. Print the self-audit page. Walk the yard at dispatch time and check three trucks and three driver files. Thirty minutes.
3. Score what you can see or put your hand on: the brake stroke, the tread, the light, the medical card date, the log. If the file and the truck disagree, the truck is the truth.
4. Every “No” gets one owner and one date before you leave. A truck or driver that would be put out of service today stays parked until it is fixed.
5. Walk it again in 30 days, and compare the next quarter's roadside results.

Spotlight: the belt and the road

THE PAIN POINT **A driver unbuckles to reach a clipboard on the passenger seat while rolling through a yard. The yard exit is a public road.** (illustrative)

Inspectors issued 667 seat belt violations during the 2026 Roadcheck (726 in 2025). Federal rules prohibit operating a commercial motor vehicle unless the driver is properly restrained, and prohibit carriers from requiring or permitting it; passengers in property-carrying vehicles must also be belted (49 CFR 392.16). (Source: CVSA and eCFR.)

This is where the Roadcheck list meets the fatality list. Roadway incidents killed 1,146 U.S. workers in 2024 (BLS CFOI). Belts, rested drivers, and working brakes are the difference between a crash someone walks away from and the phone call nobody wants to make.

- ☐ Belt use is a condition of driving, checked by supervisors or telematics, not just a policy.
- ☐ Cabs are set up so drivers do not need to unbuckle to reach paperwork, phones, or devices.

USE THIS EVERY TIME

When you find a gap: the eight-step response

1. Stop or contain.	If the gap could hurt someone today (a brake out of adjustment, a tire showing cord, a load not secured, a driver out of hours or without a valid medical certificate), that truck or driver does not leave. Anyone can call it. Stop is a right on this site. Restart is a decision. A named person makes it after the fix is in place.
2. Fix the condition first.	Repair it, replace it, re-secure it, swap the driver. Then fix the paperwork so it says what is true.
3. Find the decision that allowed it.	Ask what made the condition normal: a delivery window, a deferred maintenance budget, a short-staffed shop, a hiring rush. Do not stop at "the driver should have caught it."
4. One owner. One date.	One name, not a department. One date, not "ASAP."
5. Verify in the field.	The owner shows the fix on the truck or in the file. Re-check in 30 days.
6. Look sideways.	If one truck had it, check the fleet this week. If one driver file was missing something, audit them all.
7. Protect the person who raised it.	Thank them and tell them what changed. Federal law (49 U.S.C. 31105) protects commercial drivers who refuse to operate in violation of safety rules or report safety concerns.
8. Get help when you need it.	FMCSA publishes free compliance guides and the full regulations at fmcsa.dot.gov . Your insurer's loss-control staff and your state trucking association are other resources. For the OSHA side of your shop and yard, OSHA's On-Site Consultation Program is free and confidential (osha.gov/consultation).

Leaders own the conditions. Workers make choices inside the conditions we build. When a gap shows up, the first question is not "who did it?" It is "what did we build, fund, schedule, or tolerate that made this normal?"

This guide is a practical summary for planning and self-audit. It is not legal advice and does not replace the text of FMCSA, PHMSA, or state rules or CVSA's out-of-service criteria. Intrastate carriers follow state rules, which may differ. Regulatory text is paraphrased. When this guide and a regulation disagree, the regulation controls. Roadcheck figures come from a three-day enforcement event across North America and will not match any one fleet's experience.

01 Brakes

49 CFR 393.40–393.55, 396.3, 396.11, 396.17, 396.25 [FMCSA] · out-of-service criteria [CVSA]

5,451

brake-related vehicle out-of-service violations in three days

39.1%

of all vehicle out-of-service violations

No. 1

brake systems, the top vehicle violation again (3,379)

THE PAIN POINT **A driver hears a faint air leak at the trailer during pre-trip but has a 6 a.m. appointment. The shop is two techs short, and the last brake adjustment was “sometime in the spring.”** (illustrative)

What the data says

Source: CVSA, Aug. 25, 2026. Brake systems were the No. 1 vehicle out-of-service violation in North America with 3,379 (24.3%), and 20% defective brakes (when 20% or more of a vehicle's or combination's brakes have an out-of-service condition) were No. 3 with 2,072 (14.9%). Together: 5,451, or 39.1% of the 13,924 vehicle out-of-service violations. In 2025 the same two categories were 5,561 (41.1%). In the U.S. alone, brake systems were 2,816 (23.6%) and 20% defective brakes 1,846 (15.4%).

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Pre-trip inspections are rushed by dispatch, so leaks and out-of-adjustment brakes are missed.
- Automatic slack adjusters are trusted to fix themselves, so stroke is never measured.
- Defects on driver reports wait for a slow week that never comes.
- Brake work is done by whoever is free, not a qualified brake inspector.
- Trailers from customers or pools are hooked without a real check.

REQUIREMENTS AND CONTROLS · BRAKES

What the rules require, in plain words

393.48(a) · FMCSA · final	All brakes a vehicle is equipped with must be capable of operating at all times.
393.47(e) and 393.53 · FMCSA · final	Pushrod stroke must not exceed the readjustment limits for the chamber type. Air-braked vehicles built on or after Oct. 20, 1994 must have automatic adjusters, and adjustment indicators where the rule requires them.
396.11 and 396.13 · FMCSA · final	Drivers report defects in writing at the end of the day. The carrier repairs safety defects, or certifies repair is unnecessary, before the vehicle runs again, and keeps reports 3 months. The next driver reviews and signs.
396.17 · FMCSA · final	Each vehicle, including each trailer, passes a periodic inspection at least once every 12 months, with documentation on the vehicle.
396.25 · FMCSA · final	Brake inspections, maintenance, and repairs are done by a qualified brake inspector.

Paraphrased. Federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. Intrastate carriers: check your state's rules. Tags: FMCSA = Federal Motor Carrier Safety Regulations for commercial motor vehicles, drivers, and carriers (49 CFR 382–399). HM = hazardous materials rules (49 CFR 171–180). CVSA = North American Standard Out-of-Service Criteria, the enforcement criteria inspectors use to take a vehicle or driver off the road; they are not a regulation, but the violation behind them is. GI = OSHA general industry (29 CFR 1910). STATE = one state's rule; intrastate carriers follow state rules, which usually adopt most FMCSA rules. GUIDANCE = advisory; it is not a rule and cannot be cited by itself.

Controls that work, in hierarchy order

Eliminate	Retire or rebuild the units with chronic brake problems instead of patching them weekly.
Engineer	Disc brakes, automatic adjusters that work, and stroke indicators on every chamber; air dryer maintenance to keep moisture out.
Equipment	Brake stroke gauges and chamber-ID charts in every shop bay and truck; a wheel chock and pry bar for drivers to check stroke.
Administrative	Measured brake checks at every PM. Driver-reported defects closed before dispatch. Brake work only by qualified inspectors. A hold on any unit with an open brake defect.
Small-shop fix	Buy two brake stroke gauges and train every driver to check stroke at pre-trip. Put “brakes” as the first line on your PM sheet.

Leaders own the conditions. If the truck only leaves the yard safe when a driver is willing to argue with dispatch, it is not a safe truck. Build the schedule, the shop, and the hiring process so the safe trip is the normal trip.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

01 · Brakes

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every truck and trailer has a current annual inspection document on the unit.	☐	☐	☐	
2	Pushrod stroke is measured at each PM and recorded.	☐	☐	☐	
3	No unit has an open brake defect on its last driver report.	☐	☐	☐	
4	Defects are repaired, or certified as not needing repair, before dispatch.	☐	☐	☐	
5	Driver reports are kept for 3 months.	☐	☐	☐	
6	Brake work is done by a qualified brake inspector, and we can show their qualification.	☐	☐	☐	
7	Drivers listen for air leaks and check brake adjustment at pre-trip.	☐	☐	☐	
8	Customer and pool trailers get a brake check before we pull them.	☐	☐	☐	
9	We know our brake out-of-service history from roadside inspections.	☐	☐	☐	
10	Dispatch builds time for pre-trip into every start.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · BRAKES

Who owns it

Owner / GM	Funds brake parts, shop staffing, and the time to inspect.
Maintenance manager	Owns PM schedules, stroke measurements, and brake inspector qualifications.
Dispatch	Does not dispatch a unit with an open brake defect.
Drivers	Do a real pre-trip, report defects in writing, and refuse to drive an unsafe vehicle.
Safety manager	Tracks roadside brake violations and audits PM records.

How to verify it is working in the field

- Pick three units in the yard. Measure stroke on every chamber with the driver.
- Pull the last 20 driver vehicle inspection reports with defects. Check each was closed before the next trip.
- Ask a driver to show you how they check brake adjustment.

TOOLBOX TALK STARTER

What brake problem have you driven with because the load could not wait?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Park any unit with a brake defect or out-of-adjustment brake now and tag it. Name the owner and date for the repair, and for a fleet-wide stroke check this week. Then run the eight-step gap response at the front of this guide.

02 Tires

49 CFR 393.75, 392.7, 396.3 [FMCSA]

2,914

tire out-of-service violations, the No. 2 vehicle violation

20.9%

of all vehicle out-of-service violations

4/32"

minimum tread on front tires of a truck, tractor, or bus (2/32" on others)

THE PAIN POINT A steer tire is worn through on the inside shoulder where nobody looks during a walk-around in the dark. The outside tread looks fine. (illustrative)

What the data says

Source: CVSA. Tires were the No. 2 vehicle out-of-service violation in 2026 with 2,914 (20.9%), close to 2025 when tires were the vehicle focus area (2,899, 21.4%). In the U.S. alone, tires were 2,669 (22.3%), almost even with brake systems. CVSA's 2025 release lists examples: flat tires, insufficient tread depth, cuts exposing cord, bulges, improper repairs, and tires not rated for the load.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Tire checks are a kick and a glance, not a gauge.
- Inside duals and inside shoulders are hard to see and get skipped.
- Pressure is checked by feel, so underinflation goes unnoticed until the tire fails.
- Tire replacement is deferred to save money until a scheduled PM.
- Alignment problems wear tires fast and nobody tracks the pattern.

REQUIREMENTS AND CONTROLS · TIRES

What the rules require, in plain words

393.75(a) · FMCSA · final	Do not operate on a tire with exposed ply or belt, tread or sidewall separation, a flat or audible leak, or a cut exposing ply or belt.
393.75(b)–(c) · FMCSA · final	Front tires on a bus, truck, or tractor need at least 4/32 inch of tread in a major groove; other tires at least 2/32 inch.
392.7 · FMCSA · final	The driver must be satisfied tires are in good working order before driving.
396.3 · FMCSA · final	The carrier systematically inspects, repairs, and maintains vehicles and keeps records.
393.75(f)–(g) · FMCSA · final	Do not load a tire beyond the rating marked on it, and do not run speed-restricted tires above their rated speed.

Paraphrased. Federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. Intrastate carriers: check your state's rules. Tags: FMCSA = Federal Motor Carrier Safety Regulations for commercial motor vehicles, drivers, and carriers (49 CFR 382–399). HM = hazardous materials rules (49 CFR 171–180). CVSA = North American Standard Out-of-Service Criteria, the enforcement criteria inspectors use to take a vehicle or driver off the road; they are not a regulation, but the violation behind them is. GI = OSHA general industry (29 CFR 1910). STATE = one state's rule; intrastate carriers follow state rules, which usually adopt most FMCSA rules. GUIDANCE = advisory; it is not a rule and cannot be cited by itself.

Controls that work, in hierarchy order

Eliminate	Take chronic tire-eating units out of service until the alignment or suspension cause is fixed.
Engineer	Tire pressure monitoring systems or automatic inflation on trailers.
Equipment	A tread depth gauge and a calibrated pressure gauge in every truck, and a flashlight for the inside duals.
Administrative	Measured tread and pressure at every PM, a replacement threshold above the legal minimum, and tire wear patterns reviewed for alignment.
Small-shop fix	Put a \$10 tread gauge and a pressure gauge in every cab this week. Replace steer tires at 6/32 instead of waiting for 4/32.

Leaders own the conditions. If the truck only leaves the yard safe when a driver is willing to argue with dispatch, it is not a safe truck. Build the schedule, the shop, and the hiring process so the safe trip is the normal trip.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

02 · Tires

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Steer tires have at least 4/32 inch of tread; all others at least 2/32 inch.	☐	☐	☐	
2	No tire shows cord, separation, bulges, or cuts to the ply.	☐	☐	☐	
3	Tire pressure is checked with a gauge, not by thumping.	☐	☐	☐	
4	Inside duals and inside shoulders are checked at pre-trip and PM.	☐	☐	☐	
5	Tread depth and pressure are recorded at each PM.	☐	☐	☐	
6	Tires are rated for the load carried.	☐	☐	☐	
7	Uneven wear triggers an alignment or suspension check.	☐	☐	☐	
8	Every truck has a tread gauge, a pressure gauge, and a flashlight.	☐	☐	☐	
9	We know our tire out-of-service history from roadside inspections.	☐	☐	☐	
10	Our replacement threshold is above the legal minimum.	☐	☐	☐	

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PREVENTION PLAYBOOK · TIRES

Who owns it

Owner / GM	Funds tires before they hit the legal minimum.
Maintenance manager	Owns tire records, replacement thresholds, and alignment checks.
Dispatch	Holds a unit with a tire defect.
Drivers	Gauge pressure and tread, check the inside, and report damage.
Safety manager	Tracks roadside tire violations and spot-checks units.

How to verify it is working in the field

- Gauge every tire on three units, including inside duals.
- Compare PM tire records to what you measured.
- Ask a driver to show you how they check the inside dual in the dark.

TOOLBOX TALK STARTER

Which tire on your truck is the hardest to check, and how do you check it?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Park any unit with a tire showing cord, a bulge, a flat, or tread below the limit. Name the owner and date for replacement and for a fleet tire check. Then run the eight-step gap response at the front of this guide.

03 Cargo securement

49 CFR 393.100–393.136, 392.9 [FMCSA]

1,724

cargo securement out-of-service violations, the 2026 vehicle focus area

12.4%

of vehicle out-of-service violations (No. 4)

50 miles

within which the driver must re-inspect cargo and securement after starting a trip

THE PAIN POINT A crew loads a skid steer onto a trailer with two worn straps at the end of a long day. The chains are in the other truck. (illustrative)

What the data says

Source: CVSA. Cargo securement was the 2026 vehicle focus area and ranked No. 4 among vehicle out-of-service violations with 1,724 (12.4%), up from 1,549 (11.4%) in 2025. CVSA's focus area page reports that in 2025, roadside inspectors nationwide issued 18,108 violations for cargo not secured to prevent leaking, spilling, blowing, or falling, and 16,054 for vehicle components or dunnage not secured. CVSA notes shifting or falling freight can cause rollovers, jackknives, and deadly highway debris.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Straps and chains are worn, damaged, or not rated, and nobody retires them.
- Crews do not know the working load limit math or the minimum number of tiedowns.
- Loading is rushed at the end of a shift.
- Drivers do not re-check the load after the first 50 miles.
- Equipment and tools ride loose in the bed because “it is a short trip.”

REQUIREMENTS AND CONTROLS · CARGO SECUREMENT

What the rules require, in plain words

393.100(b)–(c) · FMCSA · final	Secure cargo to prevent it from leaking, spilling, blowing, or falling, and from shifting enough to affect stability or handling.
393.102(a) · FMCSA · final	Securement systems must withstand 0.8 g forward deceleration, 0.5 g rearward, and 0.5 g lateral without exceeding breaking strength.
393.106(d) · FMCSA · final	The aggregate working load limit of tiedowns must be at least one-half the weight of the cargo secured.
393.110(b) · FMCSA · final	Unblocked articles need at least one tiedown if 5 feet or shorter and 1,100 lb or less, two if heavier or up to 10 feet long, and one more for each additional 10 feet.
392.9(b) · FMCSA · final	The driver checks cargo and securement before driving, within the first 50 miles, and again at each change of duty status, every 3 hours, or every 150 miles, whichever comes first.

Paraphrased. Federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. Intrastate carriers: check your state's rules. Tags: FMCSA = Federal Motor Carrier Safety Regulations for commercial motor vehicles, drivers, and carriers (49 CFR 382–399). HM = hazardous materials rules (49 CFR 171–180). CVSA = North American Standard Out-of-Service Criteria, the enforcement criteria inspectors use to take a vehicle or driver off the road; they are not a regulation, but the violation behind them is. GI = OSHA general industry (29 CFR 1910). STATE = one state's rule; intrastate carriers follow state rules, which usually adopt most FMCSA rules. GUIDANCE = advisory; it is not a rule and cannot be cited by itself.

Controls that work, in hierarchy order

Eliminate	Load with forklifts and fixed fixtures that block cargo, so less depends on straps.
Engineer	Headerboards, bulkheads, rub rails with anchor points, and trailer-mounted chain systems for equipment.
Equipment	Rated chains, binders, and straps with legible working load limits, edge protectors, and a retirement bin for damaged gear.
Administrative	Securement plans for common loads (equipment, coils, pipe, pallets), the 50-mile re-check, and gear inspected before each use.
Small-shop fix	Print a one-page tiedown chart for your most common load and tape it inside the toolbox lid. Throw out every strap with a cut or missing tag today.

Leaders own the conditions. If the truck only leaves the yard safe when a driver is willing to argue with dispatch, it is not a safe truck. Build the schedule, the shop, and the hiring process so the safe trip is the normal trip.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

03 · Cargo securement

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every tiedown has a legible working load limit tag.	☐	☐	☐	
2	Damaged straps and chains are removed from service.	☐	☐	☐	
3	Aggregate working load limit is at least half the cargo weight.	☐	☐	☐	
4	Each article has the minimum number of tiedowns for its length and weight.	☐	☐	☐	
5	Equipment hauled is chained at the four corners and implements are secured.	☐	☐	☐	
6	Edge protection is used where straps cross sharp edges.	☐	☐	☐	
7	Drivers re-check the load within the first 50 miles.	☐	☐	☐	
8	Loose tools and materials are contained in the bed or van.	☐	☐	☐	
9	Crews that load have been trained on securement.	☐	☐	☐	
10	We have written securement setups for our common loads.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · CARGO SECUREMENT

Who owns it

Owner / GM	Funds rated gear and the time to load right.
Operations / yard lead	Owens securement setups and gear inspection.
Supervisor	Checks loads before they leave the yard.
Drivers	Secure, re-check at 50 miles, and refuse an unsecured load.
Safety manager	Trains crews and tracks roadside securement violations.

How to verify it is working in the field

- Check the next three loads leaving the yard: count tiedowns and add up working load limits.
- Dump out the strap bin. Count the tags you can read.
- Ask a driver when they last stopped to re-check a load.

TOOLBOX TALK STARTER**What load do we haul that you are least sure is secured right?**

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Hold any load that is short on tiedowns or using damaged gear until it is fixed. Name the owner and date for a gear sweep and a written setup for that load. Then run the eight-step gap response at the front of this guide.

04 Lights

49 CFR 393.9, 393.11, 392.7 [FMCSA]

1,659

lighting out-of-service violations (No. 5 vehicle)

11.9%

of vehicle out-of-service violations

1,514

lighting violations in the U.S. alone, No. 4 there (12.7%)

THE PAIN POINT A trailer's left rear stop lamp is out. The driver cannot see it from the cab, and the walk-around was done before the lights were switched on. (illustrative)

What the data says

Source: CVSA. Lights were the No. 5 vehicle out-of-service violation in North America in 2026 with 1,659 (11.9%), down slightly from 1,737 (12.8%) in 2025. In the U.S. they ranked No. 4 with 1,514 (12.7%). Lighting is one of the easiest violations to find and fix before an inspector does.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Walk-arounds are done without turning the lights and flashers on.
- One-person crews cannot see brake lights from the cab.
- Corroded connectors and pigtails cause intermittent failures.
- Lenses and reflective tape are dirty, cracked, or covered by the load.
- Bulbs are replaced but the wiring fault is never found.

REQUIREMENTS AND CONTROLS · LIGHTS

What the rules require, in plain words

393.9(a) · FMCSA · final	All required lamps must be capable of operating at all times.
393.9(b) · FMCSA · final	Required lamps and reflective devices must not be obscured by the load, a tailboard, dirt, or added equipment.
393.11 · FMCSA · final	Vehicles must have the lamps, reflectors, and conspicuity treatment the rule requires for their type and size.
392.7 · FMCSA · final	The driver must be satisfied lighting devices and reflectors are in good working order before driving.
396.11 · FMCSA · final	Report lighting defects on the driver vehicle inspection report and repair before the next trip.

Paraphrased. Federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. Intrastate carriers: check your state's rules. Tags: FMCSA = Federal Motor Carrier Safety Regulations for commercial motor vehicles, drivers, and carriers (49 CFR 382–399). HM = hazardous materials rules (49 CFR 171–180). CVSA = North American Standard Out-of-Service Criteria, the enforcement criteria inspectors use to take a vehicle or driver off the road; they are not a regulation, but the violation behind them is. GI = OSHA general industry (29 CFR 1910). STATE = one state's rule; intrastate carriers follow state rules, which usually adopt most FMCSA rules. GUIDANCE = advisory; it is not a rule and cannot be cited by itself.

Controls that work, in hierarchy order

Eliminate	Fewer connections mean fewer failures: sealed harnesses and LED lamps.
Engineer	LED lamps, sealed connectors, and dielectric grease on every plug.
Equipment	A light-check tool or remote that lets one driver test brake lights and turn signals alone.
Administrative	Lights-on walk-around at every pre-trip, and a spare bulb and fuse kit in every truck.
Small-shop fix	Buy one trailer light tester for the yard and stock spare bulbs and pigtails in every cab.

Leaders own the conditions. If the truck only leaves the yard safe when a driver is willing to argue with dispatch, it is not a safe truck. Build the schedule, the shop, and the hiring process so the safe trip is the normal trip.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

04 · Lights

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	All headlamps, tail, stop, turn, clearance, and marker lamps work.	☐	☐	☐	
2	Four-way flashers work.	☐	☐	☐	
3	Reflectors and conspicuity tape are present, clean, and not covered.	☐	☐	☐	
4	Lenses are not cracked or missing.	☐	☐	☐	
5	Trailer connectors and pigtails are clean and secure.	☐	☐	☐	
6	Pre-trip includes a lights-on walk-around.	☐	☐	☐	
7	One-person crews have a way to check brake lights.	☐	☐	☐	
8	Spare bulbs and fuses are in each truck.	☐	☐	☐	
9	Recurring lighting faults are traced to the wiring, not just rebulbed.	☐	☐	☐	
10	We know our lighting violation history from roadside inspections.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · LIGHTS

Who owns it

Owner / GM	Funds LED conversions and light testers.
Maintenance manager	Fixes wiring faults at the root and stocks spares.
Dispatch	Holds a unit with a required lamp out.
Drivers	Do a lights-on walk-around and report failures.
Safety manager	Spot-checks lights at the gate.

How to verify it is working in the field

- Stand at the gate at dispatch time and watch every truck's lights.
- Count how many trucks have spare bulbs.
- Ask a driver how they check brake lights when alone.

TOOLBOX TALK STARTER**How do you know your brake lights work when there is nobody behind you?**

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Hold any unit with a required lamp out until it is fixed. Name the owner and date for testers and spare kits. Then run the eight-step gap response at the front of this guide.

05 Medical certification

49 CFR 391.41, 391.43, 391.45, 391.51, 383.71 [FMCSA]

1,072

out-of-service violations for no medical card, No. 1 among drivers

27%

of all driver out-of-service violations

493

in 2025, when it was No. 3; about 2.2x more in 2026*

THE PAIN POINT A driver's medical certificate expired last month. The office tracked CDL renewals but not medical dates, and the new electronic system means the paper card in the file is no longer the whole story. (illustrative)

What the data says

Source: CVSA. No medical card was the No. 1 driver out-of-service violation in 2026 with 1,072 (27.0% of driver out-of-service violations), up from 493 (14.9%, No. 3) in 2025. Trade press reported that CVSA made a missing medical certificate an out-of-service condition on the first offense in 2025 (Overdrive, Aug. 25, 2026), and that drivers and carriers are still adjusting to FMCSA's electronic medical certification process (Heavy Duty Trucking, Aug. 26, 2026). Federally, since June 23, 2025, CDL and CLP holders no longer need to carry the paper certificate; the medical status is sent electronically to the state and posted on the driver record.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Nobody tracks medical certificate expiration dates.
- Examiners certify drivers for less than 24 months and the shorter date is missed.
- Carriers assume the electronic system worked without checking the driver record.
- Non-CDL drivers of vehicles of 10,001 lb or more are forgotten; they still need a medical card.
- New hires start driving before their file is complete.

REQUIREMENTS AND CONTROLS · MEDICAL CERTIFICATION

What the rules require, in plain words

391.41(a) · FMCSA · final	A person may not drive a commercial motor vehicle unless physically qualified and medically certified.
391.43(a) · FMCSA · final	The exam must be done by a medical examiner on FMCSA's National Registry of Certified Medical Examiners.
391.45 · FMCSA · final	Drivers are re-examined at least every 24 months, or sooner if the examiner sets a shorter period.
391.41(a)(2) · FMCSA · final	Since June 23, 2025, CDL and CLP holders with a current certification no longer need to carry the certificate; the state posts it to the driver record. Non-CDL drivers still carry it.
391.51 and 383.71 · FMCSA · final	Carriers keep proof of medical certification in the driver qualification file; CDL holders self-certify their type of operation and keep the state informed.

Paraphrased. Federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. Intrastate carriers: check your state's rules. Tags: FMCSA = Federal Motor Carrier Safety Regulations for commercial motor vehicles, drivers, and carriers (49 CFR 382–399). HM = hazardous materials rules (49 CFR 171–180). CVSA = North American Standard Out-of-Service Criteria, the enforcement criteria inspectors use to take a vehicle or driver off the road; they are not a regulation, but the violation behind them is. GI = OSHA general industry (29 CFR 1910). STATE = one state's rule; intrastate carriers follow state rules, which usually adopt most FMCSA rules. GUIDANCE = advisory; it is not a rule and cannot be cited by itself.

Controls that work, in hierarchy order

Eliminate	No driver is assigned a truck without a verified, current medical status. Make it a system block, not a reminder.
Engineer	A tracking system that flags medical expirations 60 and 30 days out.
Equipment	Access to state driver records to confirm the medical status posted for each CDL driver.
Administrative	Monthly medical expiration report to dispatch. New-hire files complete before the first trip. A list of nearby National Registry examiners.
Small-shop fix	Make a one-page list today: every driver, license type, medical expiration date. Put the next three expirations on the dispatcher's calendar.

Leaders own the conditions. If the truck only leaves the yard safe when a driver is willing to argue with dispatch, it is not a safe truck. Build the schedule, the shop, and the hiring process so the safe trip is the normal trip.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

05 · Medical certification

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every driver of a 10,001 lb or heavier CMV has a current medical certification.	☐	☐	☐	
2	We track each driver's medical expiration date, not just license renewals.	☐	☐	☐	
3	Expiration alerts go out at least 30 days ahead.	☐	☐	☐	
4	Exams are done by examiners on the National Registry.	☐	☐	☐	
5	For CDL drivers, we verify the medical status on the state driver record.	☐	☐	☐	
6	Non-CDL CMV drivers carry their medical card.	☐	☐	☐	
7	Driver qualification files hold proof of medical certification.	☐	☐	☐	
8	No new hire drives before their file is complete.	☐	☐	☐	
9	Dispatch cannot assign a driver whose certification has expired.	☐	☐	☐	
10	We know our medical card violation history from roadside inspections.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · MEDICAL CERTIFICATION

Who owns it

Owner / GM	Makes medical status a hard block on dispatch.
Safety / compliance manager	Tracks expirations and verifies driver records.
Dispatch	Never assigns a driver with an expired or unverified certification.
Drivers	Schedule renewals early and report any change in medical status.
HR	Completes qualification files before the first trip.

How to verify it is working in the field

- Pull every driver file. Count current, expired, and missing medical certifications.
- Check three CDL drivers' state records for the posted medical status.
- Ask dispatch what happens when a driver's medical expires on a Saturday.

TOOLBOX TALK STARTER**When does your medical card expire, and who else knows?**

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Pull any driver with an expired or unverified medical certification off the road now. Book the exam. Name the owner and date for a full file audit. Then run the eight-step gap response at the front of this guide.

06 Hours of service, false logs, and ELD tampering

49 CFR 395.3, 395.8, 395.22, 395.34 [FMCSA]

929

hours-of-service out-of-service violations, No. 2 among drivers (23.4%)

266

false records of duty status (6.7%)

146

ELD tampering out-of-service orders, the 2026 driver focus (3.7%)

THE PAIN POINT A dispatcher builds a route that only works if the driver “finds” two hours. The driver learns which edits the ELD will let him make. (illustrative)

What the data says

Source: CVSA. Hours of service were the No. 2 driver out-of-service violation in 2026 with 929 (23.4%), down from No. 1 in 2025 (1,076, 32.4%). False records of duty status were 266 (6.7%), down from 332 (10.0%). ELD tampering, falsification, or manipulation was the 2026 driver focus: 146 out-of-service orders (3.7%), the No. 7 driver violation. CVSA's focus page reports false records of duty status were the second most-cited driver violation nationwide in 2025, at 58,382, and five of the top 10 driver violations were related to hours of service or ELDs.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Schedules and customer windows are built without the 11-hour and 14-hour limits.
- Pay by the mile or load rewards running past the limit.
- Detention time at shippers eats the clock and nobody plans for it.
- ELD edits and unassigned driving are not reviewed.
- Drivers are not trained on exemptions, so logs are wrong by mistake.

REQUIREMENTS AND CONTROLS · HOURS OF SERVICE, FALSE LOGS, AND ELD TAMPERING

What the rules require, in plain words

395.3(a) · FMCSA · final	Property-carrying drivers: no driving after 11 hours of driving or after the 14th hour on duty following 10 consecutive hours off, and a 30-minute break after 8 hours of driving.
395.3(b) · FMCSA · final	No driving after 60 hours on duty in 7 days or 70 hours in 8 days, depending on the carrier's schedule.
395.8(e) · FMCSA · final	No driver or carrier may make a false report of duty status, or disable, jam, reprogram, or otherwise tamper with an ELD.
395.8(k) · FMCSA · final	Carriers keep records of duty status and supporting documents for at least 6 months.
395.22 and 395.34 · FMCSA · final	Carriers keep an ELD information packet in each truck. A driver reports an ELD malfunction within 24 hours and reconstructs the logs; the carrier fixes the ELD within 8 days.

Paraphrased. Federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. Intrastate carriers: check your state's rules. Tags: FMCSA = Federal Motor Carrier Safety Regulations for commercial motor vehicles, drivers, and carriers (49 CFR 382–399). HM = hazardous materials rules (49 CFR 171–180). CVSA = North American Standard Out-of-Service Criteria, the enforcement criteria inspectors use to take a vehicle or driver off the road; they are not a regulation, but the violation behind them is. GI = OSHA general industry (29 CFR 1910). STATE = one state's rule; intrastate carriers follow state rules, which usually adopt most FMCSA rules. GUIDANCE = advisory; it is not a rule and cannot be cited by itself.

Controls that work, in hierarchy order

Eliminate	Build routes and appointments that fit inside the limits with margin, including detention.
Engineer	Registered ELDs with edit and unassigned-drive alerts reviewed by someone other than the driver's dispatcher.
Equipment	Telematics that compare GPS movement to logged duty status.
Administrative	Weekly log audits, pay that does not reward running illegal, and a no-questions process for a driver who is out of hours.
Small-shop fix	Every Monday, review last week's ELD edits and unassigned driving for every driver. Fifteen minutes.

Leaders own the conditions. If the truck only leaves the yard safe when a driver is willing to argue with dispatch, it is not a safe truck. Build the schedule, the shop, and the hiring process so the safe trip is the normal trip.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

06 · Hours of service, false logs, and ELD tampering

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Routes are planned to fit the 11-hour, 14-hour, and 30-minute rules with margin.	☐	☐	☐	
2	Detention time is tracked and planned for.	☐	☐	☐	
3	ELD edits and unassigned driving are reviewed weekly.	☐	☐	☐	
4	Logs are compared to GPS or fuel records at least monthly.	☐	☐	☐	
5	Our ELD is on FMCSA's registered list.	☐	☐	☐	
6	Each truck has an ELD information packet and blank paper logs.	☐	☐	☐	
7	Drivers know how to report an ELD malfunction.	☐	☐	☐	
8	Records of duty status and supporting documents are kept 6 months.	☐	☐	☐	
9	Pay and bonuses do not reward running past the limits.	☐	☐	☐	
10	A driver who says "I am out of hours" is not questioned or penalized.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · HOURS OF SERVICE, FALSE LOGS, AND ELD TAMPERING

Who owns it

Owner / GM	Sets pay and customer commitments that fit the rules.
Dispatch	Plans loads inside the limits and never asks a driver to “find” time.
Safety / compliance manager	Audits logs, edits, and unassigned driving.
Drivers	Log accurately and stop when out of hours.
Sales / customer service	Negotiates realistic windows and detention terms.

How to verify it is working in the field

- Pick three drivers. Compare last week's logs to GPS data.
- Pull every ELD edit from last month. Ask who made each one and why.
- Ask a driver what happens when they tell dispatch they are out of hours.

TOOLBOX TALK STARTER

What load in the last month only worked if somebody bent the clock?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Stop any driver who is out of hours. Correct false entries and find the schedule decision that caused them. Name the owner and date for a weekly log audit. Then run the eight-step gap response at the front of this guide.

620

no-CDL out-of-service violations, No. 3 among drivers (15.6%)

361

English proficiency out-of-service violations, No. 4 (9.1%), all in the U.S.

June 25, 2025

when English proficiency became an out-of-service violation

THE PAIN POINT A landscaping company adds a bigger trailer for a new contract. The combination now rates over 26,000 lb. The driver who has towed for years does not have a CDL, and nobody checked. (illustrative)

What the data says

Source: CVSA. No CDL was the No. 3 driver out-of-service violation in 2026 with 620 (15.6%), down from 810 (24.4%) in 2025. English language proficiency appeared in the top five for the first time with 361 (9.1% of North American driver out-of-service violations; 9.5% in the U.S.). It became an out-of-service violation on June 25, 2025, under FMCSA enforcement guidance MC-SEE-2025-0001, after an April 2025 executive order; the requirement in 391.11(b)(2) itself has long been in the regulations. On Aug. 10, 2026, FMCSA proposed to write the English proficiency out-of-service violation into its own regulations (91 FR 51422; comments closed Oct. 9, 2026). Proposed rule, not in force.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Vehicle upgrades push combinations over the CDL threshold without anyone noticing.
- Hiring is rushed and license class and endorsements are not checked.
- Annual driving record reviews are skipped.
- Supervisors assume the ability to read signs and talk to officials without checking.
- Licenses are suspended between checks and the carrier never learns about it.

REQUIREMENTS AND CONTROLS · LICENSING AND ENGLISH PROFICIENCY

What the rules require, in plain words

383.23(a) · FMCSA · final	No one may operate a CMV requiring a CDL without having passed the knowledge and skills tests for that CDL or CLP.
383.5 · FMCSA · final	A CDL is required for combinations of 26,001 lb or more with a towed unit over 10,000 lb, single vehicles of 26,001 lb or more, vehicles designed for 16 or more passengers, and placarded hazmat.
391.11(b)(2) · FMCSA · final	A driver must read and speak English well enough to talk with the public, understand highway signs and signals, respond to official inquiries, and make entries on reports and records.
391.23 · FMCSA · final	Carriers check a new driver's driving record and safety performance history with prior employers before the driver starts.
ELP enforcement · CVSA · final	Since June 25, 2025, a driver who cannot meet 391.11(b)(2) under FMCSA guidance is placed out of service. The rule applies in the U.S., not in Canada or Mexico.

Paraphrased. Federal regulatory text checked on eCFR (current to Oct. 8, 2026) on Oct. 13, 2026. Intrastate carriers: check your state's rules. Tags: FMCSA = Federal Motor Carrier Safety Regulations for commercial motor vehicles, drivers, and carriers (49 CFR 382–399). HM = hazardous materials rules (49 CFR 171–180). CVSA = North American Standard Out-of-Service Criteria, the enforcement criteria inspectors use to take a vehicle or driver off the road; they are not a regulation, but the violation behind them is. GI = OSHA general industry (29 CFR 1910). STATE = one state's rule; intrastate carriers follow state rules, which usually adopt most FMCSA rules. GUIDANCE = advisory; it is not a rule and cannot be cited by itself.

Controls that work, in hierarchy order

Eliminate	Spec trailers and trucks below the CDL threshold where the work allows, or assign CDL drivers to heavier combinations.
Engineer	A vehicle list with each unit's GVWR and the license class needed, posted where trucks are assigned.
Equipment	Access to state driving records and a continuous license monitoring service, if you can afford one.
Administrative	License class and endorsement checks before hire and before any new vehicle assignment. Annual record reviews. A plain-language check of English proficiency during the road test.
Small-shop fix	Add GVWR and GCWR to your vehicle list today and match every driver to the trucks and trailers they are allowed to run.

Leaders own the conditions. If the truck only leaves the yard safe when a driver is willing to argue with dispatch, it is not a safe truck. Build the schedule, the shop, and the hiring process so the safe trip is the normal trip.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

07 · Licensing and English proficiency

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	We know the GVWR and GCWR of every truck and trailer combination we run.	☐	☐	☐	
2	Every driver holds the license class and endorsements their vehicle needs.	☐	☐	☐	
3	License class is checked before any new vehicle or trailer is assigned.	☐	☐	☐	
4	Driving records are reviewed at hire and at least annually.	☐	☐	☐	
5	Prior-employer safety history is checked for new drivers.	☐	☐	☐	
6	We learn about suspensions quickly, not at the next annual review.	☐	☐	☐	
7	The road test includes reading signs and answering questions in English.	☐	☐	☐	
8	Supervisors know English proficiency is an out-of-service violation in the U.S.	☐	☐	☐	
9	Training is available for drivers who need to build English skills.	☐	☐	☐	
10	We know our licensing violation history from roadside inspections.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · LICENSING AND ENGLISH PROFICIENCY

Who owns it

Owner / GM	Approves vehicle specs with the CDL threshold in mind.
HR / recruiting	Verifies license class, endorsements, and history before hire.
Safety / compliance manager	Runs annual record reviews and license monitoring.
Supervisor / dispatch	Matches drivers only to vehicles they are licensed for.
Drivers	Report license changes and suspensions right away.

How to verify it is working in the field

- Match every driver to every vehicle they drove last month. Check license class for each.
- Pull five driver files and find the last annual record review.
- Ask a supervisor how they would know a driver's license was suspended last week.

TOOLBOX TALK STARTER

Is there any truck and trailer combination here that you are not sure you are licensed to pull?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Take any driver without the right license class off that vehicle now. Name the owner and date for a full vehicle-to-driver license match. Then run the eight-step gap response at the front of this guide.

CHECK OUR WORK

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Sources retrieved and checked October 13, 2026. This guide is a practical summary for planning and self-audit. It is not legal advice and does not replace the text of FMCSA, PHMSA, or state rules or CVSA's out-of-service criteria. Intrastate carriers follow state rules, which may differ. Regulatory text is paraphrased. When this guide and a regulation disagree, the regulation controls. Roadcheck figures come from a three-day enforcement event across North America and will not match any one fleet's experience.

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