
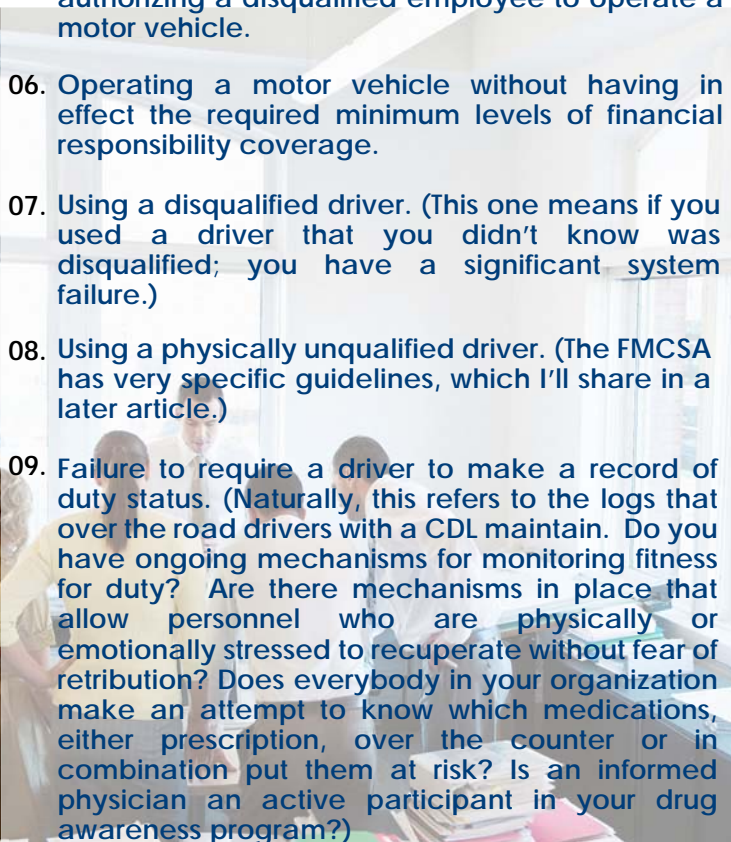




Give Yourself A Safety Audit

The Federal Motor Carrier Safety Administration (FMCSA) has developed a list of actions which would constitute an automatic failure of a safety audit. FMCSA states the commission of any of these actions is indicative of a "clear lack of safety management controls". I've altered it a bit to enhance its pertinence to medical transportation. This is not an all inclusive list, but in light of recent occurrences it merits attention.

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01. Failure to implement an alcohol or controlled substances testing program.
 02. Using a driver who refused to submit to an alcohol or controlled substance test.
 03. Using a driver known to have tested positive for a controlled substance.
 04. Knowingly allowing, requiring, permitting or authorizing an employee with a driver's license suspended by a State to operate a motor vehicle.
 05. Knowingly allowing, requiring, permitting or authorizing a disqualified employee to operate a motor vehicle.
 06. Operating a motor vehicle without having in effect the required minimum levels of financial responsibility coverage.
 07. Using a disqualified driver. (This one means if you used a driver that you didn't know was disqualified; you have a significant system failure.)
 08. Using a physically unqualified driver. (The FMCSA has very specific guidelines, which I'll share in a later article.)
 09. Failure to require a driver to make a record of duty status. (Naturally, this refers to the logs that over the road drivers with a CDL maintain. Do you have ongoing mechanisms for monitoring fitness for duty? Are there mechanisms in place that allow personnel who are physically or emotionally stressed to recuperate without fear of retribution? Does everybody in your organization make an attempt to know which medications, either prescription, over the counter or in combination put them at risk? Is an informed physician an active participant in your drug awareness program?)
 10. Requiring or permitting the operation of a vehicle declared "out of service" before repairs are made. I have seen written policies which allow a field supervisor to permit the use of out of service vehicles.
 11. Using a motor vehicle not periodically inspected. Is your vehicle "fitness for duty" assessed and documented daily?

This is not only an issue for management. Every member of an organization is responsible for their personal safety and the safety of others. "Audit" in Latin means he, she or it hears. Maybe the best "safety management control" is achieved by everyone thinking about safety intelligently, sharing their thoughts and listening to each other.