

Plan Walkthrough Preparation Guide

Companion to HazMat Employee In-Depth Security Training (Add-On 1, Highway Mode)

49 CFR §172.704(a)(5) · 49 CFR §172.802

Why this guide exists. Two of the three §172.704(a)(5) training elements, the company's specific security procedures and the employee's responsibilities under the plan, are inherently company-specific. A generic video alone cannot satisfy them. The plan walkthrough is how those two elements get covered, and the Walkthrough Acknowledgment is how it gets documented. This guide tells you how to run the walkthrough so the certificate issues and the training record stands up to a PHMSA audit.

1. What the walkthrough is: and what it is not

The plan walkthrough is a documented one-on-one (or small-group) session between the hazmat employee and the company's designated security coordinator. The coordinator opens the company's actual written security plan under §172.802 and walks the employee through the sections that apply to their role, then confirms the employee understands their specific responsibilities under the plan.

It typically runs 30 to 60 minutes per employee. It can be longer for senior roles whose plan responsibilities span multiple sections. It can be shorter, but rarely under 20 minutes, for narrowly scoped roles.

It is NOT a generic security briefing. A generic briefing about hazmat threats is what the §172.704(a)(4) Security Awareness training covers (already in Module 4 of the Core Bundle). The walkthrough is anchored on YOUR plan, with YOUR procedures, in YOUR facility, for THIS employee's role.

It is NOT something the training video does for you. The video covers the §172.704(a)(5) framework, what (a)(5) requires, what a §172.800 plan must contain, the three plan elements, the recognize-and-respond layer. The walkthrough applies that framework to your specific plan.

It is NOT a substitute for plan development. If your company does not yet have a written §172.800 plan, the walkthrough cannot happen and (a)(5) training cannot be completed, develop the plan first.

2. Who runs the walkthrough

The Hazardous Materials Regulations do not prescribe a job title for the person running it. The regulations require a designated security coordinator under §172.802(a), which is the person accountable for the plan. Most companies designate one of:

- Compliance manager or compliance officer
- EHS director or EHS manager
- Operations manager (for smaller carriers)
- Safety director or safety manager
- Security manager (rare in highway-mode small carriers; more common in large fleets)
- Owner-operator personally (for single-truck owner-operators subject to §172.800)

The same person should run all walkthroughs for the company unless the workforce is too large, consistency matters more than seniority. If multiple coordinators are needed, all of them should be trained on the plan and on this walkthrough procedure.

3. What to bring to the walkthrough

- **The company's current written security plan.** The actual document, not a summary. The walkthrough opens this document and walks it section by section.
- **The plan version number and last-review date.** Both go on the Acknowledgment. If you cannot tell what version of the plan you have or when it was last reviewed under §172.802(b), pause the walkthrough until you can.
- **The §172.800(a) self-assessment documentation.** Brief, written record of why the company concluded §172.800 applies to this operation. The employee should see and understand this.
- **The employee's role description.** What the employee actually does, packaging, loading, driving, dispatch, supervisor of any of these, so the coordinator can tailor which plan sections to emphasize.
- **The Walkthrough Acknowledgment form (template provided separately).** Print one per employee, or have the digital version ready for the LMS upload.
- **A note-taking pad.** If the walkthrough surfaces a gap in the plan (an employee responsibility that the plan does not currently address), note it for the next §172.802(b) review cycle.

4. Walkthrough script: section by section

Walk these sections in order. Time-budget shown is a guideline for a typical 30 to 45 minute walkthrough; adjust for role scope.

4.1 Plan applicability: why the company is subject to §172.800 (~5 min)

Open the §172.800(a) self-assessment documentation. Walk the employee through which §172.800(b) trigger materials the company offers or transports. Confirm the employee

understands that the plan applies to THE COMPANY, not just to drivers, packagers, loaders, dispatchers, and clerks who handle the trigger materials are all 'covered' employees.

4.2 Plan Element 1: Personnel Security (~7 min)

Open the personnel-security section of the plan (§172.802(a)(1)). Walk the employee through:

- Pre-employment screening procedures the company uses for hazmat-employee positions
- Background check requirements, if any, beyond the TSA STA for drivers
- Insider-threat indicators the company expects employees to watch for
- How the company handles concerns about a coworker's behavior, who to tell, how to tell them
- Ongoing review touchpoints, annual reviews, change-of-role reviews

4.3 Plan Element 2: Unauthorized Access (~7 min)

Open the unauthorized-access section (§172.802(a)(2)). Walk the employee through:

- Facility access controls, who has keys, badges, codes, where the perimeter is
- Rolling-stock access, who can move a trailer, who can break a seal, who can re-seal
- Credential discipline, when to challenge an unbadged person, when to call security or the coordinator
- Visitor controls, how visitors are escorted, what areas they cannot enter
- Yard discipline, gate procedures, after-hours rules, lighting expectations

4.4 Plan Element 3: En-Route Security (~7 min, longer for drivers)

Open the en-route security section (§172.802(a)(3)). For drivers, this is the longest part of the walkthrough. Walk the employee through:

- Routing requirements, preferred routes, prohibited routes, NRHM routing under §397.67, HRCQ routing under §397.101
- Tracking and communications, what tracking the company uses, when the driver must check in, who to call if communications fail
- Rest-stop discipline, approved stops, parking distance rules, attendance under §397.5 and §397.7
- Law-enforcement coordination, who the driver calls if approached by an officer, what documents to surface, when to call CHEMTREC

- Threat response, if the driver suspects surveillance, hijacking attempt, or attempted diversion, what to do and who to call

4.5 Employee's specific responsibilities (~5 min)

This is the most important part. Have the employee tell YOU, in their own words, what they are responsible for under the plan. Listen for gaps. Correct misunderstandings. The Acknowledgment form has a 'responsibilities the employee can name' section, fill it in based on this conversation. If the employee cannot name their responsibilities at the end of this section, the walkthrough is not done.

4.6 Plan maintenance, recordkeeping, and changes (~3 min)

Briefly cover:

- How the plan is reviewed under §172.802(b), annually at minimum, or as circumstances change
- Where training records live and who keeps them
- How the employee will be notified if the plan changes, and what refresher will be required
- Retention requirements, the plan and training records together

4.7 Q&A and sign-off (~5 min)

Open the floor. Common questions to be ready for:

- What if I see something suspicious but I'm not sure, do I report?
- What happens if I make a security mistake, am I in trouble?
- Who do I call if the coordinator is unavailable?
- How often will we redo this?

Answer in plain language. Then complete the Walkthrough Acknowledgment together, the employee signs first, then the coordinator countersigns. Upload to the LMS.

5. What '****documented****' means under §172.704(d)**

The §172.704(d) recordkeeping rule requires a record of training that includes the hazmat employee's name, the most recent training date, a description of the training, the certification statement, and the employer's certification that the record is accurate. The Walkthrough Acknowledgment provides the 'description' for the (a)(5) category.

Keep the Acknowledgment together with the rest of the employee's hazmat training record. Retain for the duration of the employee's service as a hazmat employee plus 90 days after termination.

6. Common pitfalls to avoid

- **Walking the wrong plan version.** If your plan was revised yesterday, walk the new version. The Acknowledgment records the plan version walked, and if the version is stale, the audit finding will follow.
- **Group walkthroughs with no role tailoring.** It is fine to walk multiple employees together IF their roles are similar. Walking a driver and a billing clerk together usually doesn't work, their responsibilities under the plan are too different.
- **Skipping the '****employee names their own responsibilities****' check.** **An auditor will sometimes ask the employee directly. If the employee cannot articulate what they are responsible for, the training was not effective regardless of what the form says.
- **Issuing the certificate before the walkthrough is logged.** The LMS enforces this, but if you bypass for any reason, the certificate is misleading and the audit finding is severe.
- **Treating the walkthrough as paperwork.** If the employee signs without understanding, the form is worthless. Take the time. This is the single highest-leverage moment in the (a)(5) program.

7. Recurrent walkthroughs

§172.704(c)(2) requires recurrent training at least once every three years. The walkthrough must be repeated each cycle. In addition, §172.802(b) requires the plan to be reviewed and revised as circumstances change. If the plan changes materially before the three-year mark, new trigger materials, new procedures, new employee responsibilities, a refresher walkthrough on the changed content is required at that time, not at the next triennial mark.

Note both dates on the Acknowledgment: the most recent walkthrough date and the plan version walked. This makes it obvious to an auditor that the training tracked the plan in force at the time of the walkthrough.

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