

CSA – Compliance, Safety & Accountability

Training By

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CSA – What Is It?

- New, high-impact FMCSA safety program
- To improve large truck and bus safety
- Ultimately reduce crashes
- Contact a larger number of carriers
- Address safety problems before crashes occur

What is Changing?

- The way FMCSA assesses carrier safety
 - Identifies unsafe carrier and driver behaviors that lead to crashes
 - Uses all safety-based roadside inspection violations
 - Evaluates/tracks driver performance individually
- How FMCSA addresses carrier safety issues
 - Reaches more carriers earlier and more frequently
 - Improves efficiency of investigations
 - Focuses on specific unsafe behaviors
 - Identifies root causes
 - Defines and requires corrective actions
- How FMCSA promotes safety
 - Forces carriers/drivers to be accountable for their safety performance
 - Demands and enforces safe on-road performance
 - Makes more complete safety performance assessments publicly available

Major Components of CSA

- Safety Measurement System
- Safety Fitness Determination (in process)
- Comprehensive Intervention Process

SMS – Safety Measurement System

- Uses crash records and ALL roadside inspection safety-based violations to determine carrier/driver safety
- Weights time and severity of violations based on relationship to crash risk
- Triggers the intervention process (eventually would feed the proposed Safety Fitness Determination)
- Calculates safety performance based on 7 **Behavior Analysis and Safety Improvement Categories (BASICs)**

Everything Counts! Just Kidding!

- Data limited to:
 - Commercial Motor Vehicles
 - Violations in Personal Vehicles do NOT count
 - Data must be tied to Inspections
 - OOS as a result of a crash does NOT count
 - Violations must be written as FMCSR violations, not state codes

SMS BASIC Categories

Unsafe Driving
(Parts **392** & **397**)

Fatigued Driving
(Parts **392** & **395**)

Driver Fitness
(Parts **383** & **391**)

Drugs/Alcohol
(Part **392**)

Vehicle Maintenance
(Parts **393** & **396**)

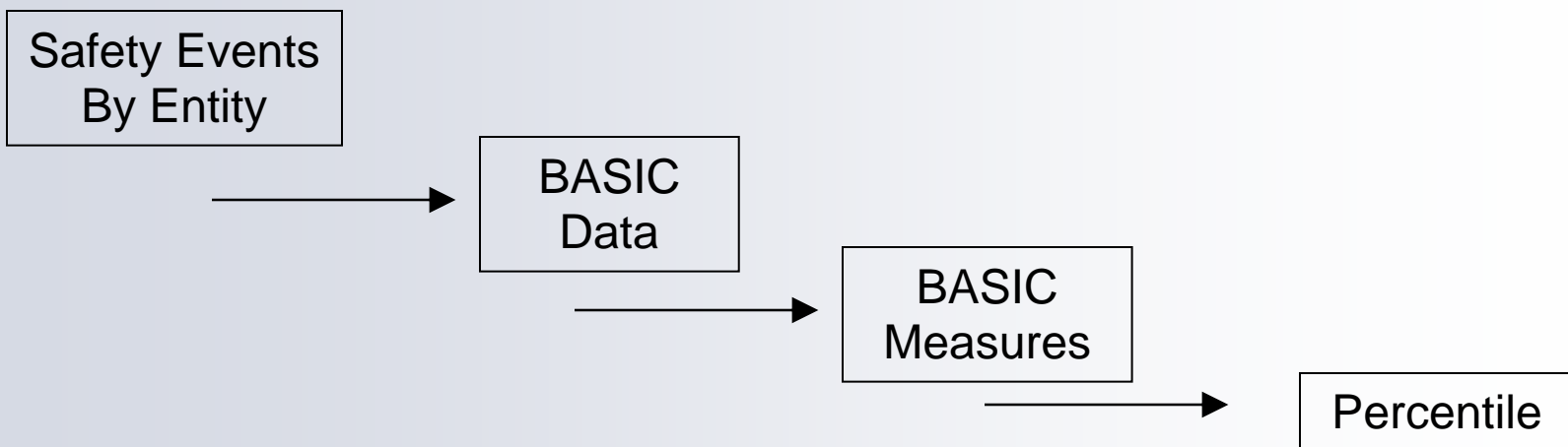
Improper Loading/Cargo Issues
(Parts **392, 393, 397** & **HM Violations**)

Crash Indicator



Methodology Overview

1. Obtain on-road safety event data (e.g., inspections, crashes) and attribute to entity to create a safety event history
2. Place each entity's violations/crashes into a BASIC
3. Convert BASIC data to quantifiable measure/rate (Safety Fitness Determination would be based on absolute performance)
4. Based on each entity's BASIC measure, develop rank and percentile for each entity's BASIC performance



Safety Events (Data)

- Carriers
 - Includes 24 months of carrier on road safety performance
- Drivers
 - Includes 36 months of driver on road performance

BASIC Measures

- **Time Weighting / Time Frame** - More recent events more relevant
- **Severity Weightings** - Increase weighting of violations that have been shown to create a greater risk of crash involvement
- **Normalizing** - Based on exposure: use of number of inspections and power units
- **Single Inspection Cap** – limit violation weight of single poor inspection
- **Violation Cap** – Cited section number only counts once per inspection

BASIC Measures

Unsafe Driving Basic and Crash Indicator use a combination of VMT and Power Units.

- Fleets will be identified as one of the following:
 - Combination trucks (fleet >70%), or
 - Straight trucks (fleet >30%)
- Utilization "credit" will be "given" based on mileage (VMT)
- UPDATE your mileage on your MCS-150!

Safety Event Groups

Safety Event Group	Combo Segment: # of Inspections with Unsafe Driving Violations	Straight Segment: # of Inspections with Unsafe Driving Violations
1	3-8	3-4
2	9-21	5-8
3	22-57	9-18
4	58-149	19-49
5	150+	50+

Data Sufficiency

- Minimum number of inspections with applicable violations required for percentile to be assigned
- Assists in identification of patterns of carrier behavior- note safety problems across multiple inspections

BASIC	Number of Inspections
Unsafe Driving	3
Fatigued Driving (Hours-of-Service)	3
Driver Fitness	5
Controlled Substances / Alcohol	1
Vehicle Maintenance	5
Cargo Related	5
Crash Indicator	2 Crashes

BASIC Thresholds

BASIC	Other	HM	Passenger
■ Unsafe Driving	>65%	>60%	>50%
■ Fatigued Driving	65%	60%	50%
■ Driver Fitness	80%	75%	65%
■ Drugs / Alcohol	80%	75%	65%
■ Vehicle Maintenance	80%	75%	65%
■ Cargo Related	80%	75%	65%
■ Crash Indicator	65%	60%	50%

“Point System”

- All violations will be assigned points
 - NOT the same as points on an MVR
- Violations weighted by time and severity
- Points converted to percentages
- FMCSA will not limit total number of points per driver or company
- Points will follow drivers for 36 months
- Points will follow carriers for 24 months
 - Driver points do not transfer to future employers, but stay with carrier under which violation occurred

How the math works...

- Time Weights
 - 0-6 months old = 3
 - 6-12 months old = 2
 - 12-24 months old = 1
- Out of Service
 - Add 2 points to severity weight prior to multiplying
- Violation Severity Weights
 - Range from a low of 1 to a high of 10

Example 1: Current Level 1 Inspection

- Violations found:
 - 1 Brake out of Adjustment
 - False Log – put OOS for 10 hours
- Time Weight = 3
- OOS Weight = +2
- Severity Weights
 - Brake = 4
 - False Log = 7
- Brake Violation $3 \times 4 = 12$ Maint.
- HOS Violation/OOS $3 \times (7 + 2) = 27$ HOS
- **Counts as a Clean Inspection for Unsafe Driving, Driver Fitness, Drug/Alcohol and Cargo BASICS**

More Math

- Points in each category are converted into percentages based on Safety Event Groups
- Percentages change based on action of peers, as well as company
 - Moving target!

How To Improve Scores

- “Good” Inspections
- “Get Well” Rules
 - Violation time weight diminishes
 - Unsafe Driving and Controlled Substances /Alcohol BASICs
 - No percentile assigned if no inspections with a violation in these BASICs in the last year
 - Crash Indicator
 - No percentile assigned if no crashes in last year
 - Fatigued Driving (HOS), Driver Fitness, Vehicle Maintenance and Cargo Related BASICs
 - No percentile assigned if:
 - No inspections with a violation in that BASIC within the past year; **and**
 - Most recent relevant inspection does not have a violation of that BASIC

Intervention Process

- Early Contact
 - Warning Letter
 - Carrier Access to Safety Data and Measurement
- Investigation
 - Off-site Investigation
 - On-site Focused Investigation
 - On-site Comprehensive Investigation

Intervention Process (Cont'd)

- Follow-On
 - Cooperative Safety Plan (CSP)
 - Notice of Violation (NOV)
 - Notice of Claim (NOC)
 - Settlement Agreement

Drivers

- The new Carrier Measurement System provides internal tools, including enhanced information on individual drivers, to investigators to more effectively and efficiently conduct carrier investigations
 - Tools allow for targeted sampling using enhanced driver information
 - Follow up on serious violations
- Under CSA, **individual drivers will *NOT* be assigned safety ratings or safety fitness determinations**

Drivers

- Other Agency initiatives are underway, including the Pre-employment Screening Program (PSP)
 - PSP was mandated by Congress and is *not* a part of CSA
 - “Driver Profiles” from FMCSA’s Driver Information Resource (DIR) will be available to carriers through PSP
 - Driver Profiles will only be released with driver authorization
- <http://psp.fmcsa.dot.gov>

Safety Fitness Determination

SFD would:

- **Incorporate on-road safety performance** via new SMS which is updated on a monthly basis
- **Continue to include** major safety violations found as part of CSA investigations
- Produce a **Safety Fitness Determination (SFD)** of
 - Unfit *or*
 - Marginal *or*
 - Continue to Operate

SFD Now / Future

- CSA incorporates the existing safety rating process and will continue to do so until SFD would go into effect
- Drivers will not be rated
- Ratings are issued based on investigation findings:
 - On-site comprehensive investigations can result in Satisfactory, Conditional or Unsatisfactory ratings
 - Onsite focused investigations can result in Conditional or Unsatisfactory Ratings
 - Offsite investigations do not result in a rating
 - Carriers can request an administrative review of its safety rating (§385.17)

Carrier Measurement: SMS Results

ABC Trucking
DOT# **00000**
 SMS Methodology

Welcome to the Motor Carrier Safety Measurement System

The SMS provides an assessment of a motor carrier's on-road performance and investigation results within the Behavior Analysis and Safety Improvement Categories (BASICS). Assessments cover 24 months of activity and results are updated monthly.

Select a BASIC below to view details

BASICS Overview (Based on a 24-month record ending November 19, 2010)	PERFORMANCE			BASICS Status
	On-Road	Investigation	=	
Unsafe Driving	89.3%		=	ALERT
Fatigued Driving (Hours-of-Service)	49.8%		=	
Driver Fitness	88.2%		=	ALERT
Controlled Substances and Alcohol	No Violation		=	
Vehicle Maintenance	54.1%		=	
Cargo Related	Not Available	Not Available	=	Not Available
Crash Indicator	Not Available	Not Applicable	=	Not Available

View Complete Measurement Profile

SUMMARY OF ACTIVITIES

	Number	OOS Rate
Total Inspections:	444	
Vehicle Inspections:	314	28 %
Driver Inspections:	443	5 %
Hazardous Materials Inspections:	0	0 %
Total Crashes:	13	
Tow-aways:	12	
Injuries/Fatalities:	5	

RECENT INVESTIGATIONS

The following are up to five most recent investigations:

Intervention Type	Date
Compliance Review	9/9/2010
Compliance Review	5/1/2008
Compliance Review	6/29/2001
Compliance Review	8/25/2000
Compliance Review	6/7/1991

DATA DOWNLOADS

Scope:

File Type:

ICON LEGEND

Serious violation cited within last 12 months from an investigation.

ALERT Because this carrier exceeds the FMCSA established intervention threshold relative to its safety rating grouping and/or has been cited with one or more serious violations within the past 12 months. Therefore, this carrier may be prioritized for an intervention action and roadside inspection.

Violation Details Provided in SMS

Driver Fitness
Operation of CMVs by drivers who are unfit to operate a CMV due to lack of training, experience, or medical qualifications. (FMCSR Parts [383](#) and [39.1](#))

Alert

ALERT

BASIC Overall Status

Exceeds the established Intervention Threshold to be prioritized for Intervention and Cited with a serious violation within the previous 12 months.


(Based on a 24-month record ending November 19, 2010)

On-road Performance Detail

Investigation Results Detail

Performance Tools

On-road Performance Overview



88.2%

MEASURE: 0.22

PERCENTILE: 88.2%

(Threshold: 80%)

Relevant Inspections: 443

Total Inspections with Driver Fitness Violations: 21

Total Driver Violations: 22

Safety Event Grouping

101-500

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Information Center

Select a topic below to view information:

- [What is the Motor Carrier Safety Measurement System \(SMS\)?](#)

[View all possible Driver Fitness violations](#)

[Request a data correction review ▶](#)

DRIVER FITNESS VIOLATIONS

Violation	Description	# Total Violations	# OOS Violations	Violation Weight
383.23(a)(2)	Operating a CMV without a CDL	2	2	8

Data Center

Scope:

File Type:

[DOWNLOAD](#)



Carrier Measurement: SMS Results

Select a BASIC below to view details

SMS Methodology

BASICs Overview
(Based on a 24-month record ending November 19, 2010)

	PERFORMANCE		
	On-Road	Investigation	BASICs Status
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Driver Fitness	88.2%		ALERT
Controlled Substances and Alcohol	No Violations		
Vehicle Maintenance	54.1%		
Cargo Related	Not Available	Not Available	Not Available
Crash Indicator	Not Available	Not Applicable	Not Available

Profile

Number OOS Rate

28 %

5 %

0 %

Investigations:

Date

9/9/2010

5/1/2008

6/29/2001

8/25/2000

6/7/1991

Compliance Review


ALERT Because this carrier exceeds the FMCSA established intervention thresholds relative to its safety rating grouping and/or has been cited with one or more serious violations within the past 12 months, this carrier may be prioritized for an intervention action and roadside inspection.

DATA DOWNLOADS

Scope: All BASICs

File Type: Excel

Further Drilldown in SMS



Driver Fitness
Operation of CMVs by drivers who are unfit to operate a CMV due to lack of training, experience, or medical qualifications. (FMCSR Parts [383](#) and [391](#))

Alert

ALERT

BASIC Overall Status
Exceeds the established Intervention Threshold to be prioritized for Intervention and Cited with a serious violation within the previous 12 months.
(Based on a 24-month record ending November 19, 2010)

Data Center

Scope:

File Type:


[DOWNLOAD](#)

On-road Performance Detail


Investigation Results Detail

Performance Tools

Investigation Results Overview

 **Serious violation discovered**

Certain violations found during investigations can trigger an alert in a BASIC. The violation will be displayed for one year.



Information Center

Select a topic below to view information:

- What is the Motor Carrier Safety Measurement System (SMS)?

[View all possible Driver Fitness violations](#)

[Request a data correction review](#)

SERIOUS VIOLATIONS FROM INVESTIGATIONS

Investigation	Violation	Description	Investigation Date
Compliance Review	391.45(b)(1)	Using a driver not medically re-examined each 24 months	9/9/2010

Go to Page: [Previous](#) [Next](#) Violations per page:

Displaying 1 - 1 of 1 Serious Violations

Reasons for Interventions

(provided by Vigillo)

Prior to CSA	After CSA
Unsafe Driving = 30%	Unsafe Driving = 15%
Crash = 22%	Crash = 16%
Fatigue Driving = 15%	Fatigue Driving = 31%
Cargo = 14%	Cargo = 15%
Veh. Maintenance = 10%	Veh. Maintenance = 14%
Driver Fitness = 6%	Driver Fitness = 9%
Drug/Alcohol = 3%	Drug / Alcohol = 0%

Top Violations in 2010

make up 81% of all violations

(provided by Vigillo)

CFR Code	Description	Percentage
395.8	Logs - Form & Manner	17.44%
392.2S	Speeding	12.17%
395.8	Logs Not Current	12.09%
391.41A	No Med Card in Possession	9.84%
391.11	Non-English Speaker	6.7%
395.3	Logs - Over 14 Hours	6.56%
392.16	Not Using Seatbelt	5.55%
395.3	Logs – Over 11 Hours	3.68%
395.8	False Logs	3.53%
391.45	Expired Medical Card	3.2%

43.38% of violations are HOS-related – FOCUS your energies

Avoid Foolish Inspections

- Unsafe Driving
 - Speeding
- Fatigued Driving
 - Form & Manner / RODS Not Current
- Driver Fitness
 - Med. Certificate in Possession / Not Current
- Drug / Alcohol
 - Terminate Problem
- Vehicle Maintenance
 - Pre-Trip Inspections / Drivers Leaving when Repair is Needed / Lights!
- Cargo
 - Shipper Loaded / Driver Needs to Double Check!
- Crash
 - 12 months to clear BASIC

CSA Success

Maintain Good Compliance

View your CSI / Data Regularly

Involve Your Drivers

Keep Data Current / Update MCS-150

Check and Challenge Data

Respond to Warnings

Clean Inspections / Reviews

FOCUS on Most Common / Most Severe
Violations First

Data Qs System



- The DataQs system is an electronic means for filing concerns about Federal and State data released to the public by the Federal Motor Carrier Safety Administration (FMCSA). Through this system, data concerns are automatically forwarded to the appropriate office for resolution. The system also allows filers to monitor the status of each filing.
- <https://dataqs.fmcsa.dot.gov>

Challenging Data

■ **Improper Challenges:**

- Driver fired, please remove all these violations
- Crash not our fault, please remove
- Driver caused the violation, please remove
- Owner operator (leased to company), please remove

■ **Helpful Suggestions:**

- Attach documents that support the challenge
- Be specific and detailed in your narrative
- Owner operator (leased to company): attach lease agreement
- Ensure contact information is accurate and updated
- Check the status frequently, (additional information may be requested)

Summary

- 7 BASICS vs. 4 SEAs
- New Intervention Process
- Every Roadside Violation Counts
- “Get Well” Rules
- Education & Preparation are Key
- Public Data will Still be Shielded

Conclusion

- What is the largest ROI in trucking?
- NOT having an accident and
- NOT being fined for non-compliance

Contact Information

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