

# **HOW THE COMPREHENSIVE SAFETY ANALYSIS (CSA)**

## **REPORTING SYSTEM AFFECTS FLEETS**

Have you heard the big news? Change is coming! If you operate an interstate truck or bus fleet with vehicles over 10,000 lbs. GVW, it's being brought to you by CSA. Have you heard of this? If not, you'd better get up to speed and start preparing now!

The Federal Motor Carrier Safety Administration (FMCSA) has been rating fleet safety for years through its SafetyStat system. It used out-of-service violations, tickets, and crashes to attempt to monitor the 700,000 plus registered fleets in the US. However, due to the archaic methods used, its limited resources, and the huge number of fleets out there, the FMCSA was in reality only able to monitor 12,000-13,000 carriers a year (less than 2%) and these were usually the largest fleets.

It's here now. The FMCSA has begun rolling out its new Comprehensive Safety Analysis rating system, known as CSA, which revolutionizes the way the agency monitors fleet safety. It is designed to improve large truck and bus safety and ultimately reduce commercial motor vehicle related crashes, injuries, and fatalities. It enables FMCSA and state partner agencies to contact a larger number of carriers earlier in order to address safety problems before crashes occur.

CSA takes advantage of technology and the wealth of information stored in computer data bases. Instead of just accumulating limited information as before, this system gathers data from roadside inspections, traffic violations, and crashes, analyzes it in a new way, and weights violations based on recent research concerning the degree to which the violation contributes to the cause or severity of crashes in addition to weighting each violation by time so that the most recent violations count more than older ones.

It also separates driver-related violations from fleet-related ones and sorts them into multiple categories to highlight specific problem areas. The seven categories that are used are called Behavior Analysis and Safety Improvement Categories or BASICS and they include the following:

- Unsafe driving – speeding, reckless driving, improper lane change, and inattention
- Fatigued driving – operation of commercial vehicles by drivers who are ill, fatigued, or in non-compliance with the Hours-of-Service regulations
- Driver fitness – failure to have a valid and appropriate commercial driver's license or being medically unqualified to operate a commercial motor vehicle
- Controlled substances/alcohol – drivers who are impaired due to alcohol, illegal drugs, and misuse of prescription or over-the-counter medications.
- Vehicle maintenance – Brakes, lights, tires, and other mechanical defects and failure to make required repairs.
- Cargo-related – Failure to properly prevent shifting loads, spilled or dropped cargo, overloading, and unsafe handling of hazardous materials.
- Crash indicator – Histories or patterns of high crash involvement including frequency and severity.

A fleet's measurement for each category depends on the number of adverse safety events, the severity of violations or crashes, and when the events occurred (more recent events are weighted more heavily). A fleet's rating will be based on the individual categories rather than overall performance. In fact, failing either Unsafe Driving or Fatigued Driving will lead to an unsatisfactory rating even if all the other categories are fine.

There are two major differences in this system versus the old SafetyStat system. The first is that this system will include separate measurement systems for carriers and drivers. (The old system only measured carriers). The second is that the data that feeds the unsafe driving category will include warnings as well as citations for traffic violations. (SafetyStat only uses convictions.) This means that any and all problems that the driver incurs while driving for the fleet, even if not ticketed or cited will be included in the fleet's safety record.

Both the driver's and the carrier's safety scores are based on both good and bad inspections. If there is not enough of either of them to provide "sufficient data", the CSA record will indicate "insufficient data" instead of a rating. Today drivers with an electronic log system are often waved through a roadside inspection site under the assumption they're running legal. But in this situation, no record would be recorded and the driver and fleet would not receive credit for a good inspection. So instead of receiving the good rating it deserves, the fleet's CSA record would show "insufficient data". This is a problem that still has to be worked out.

If the CSA performance measurement system indicates that the FMCSA needs to intervene in a carrier's operation, it will, in order of increasing severity, issue a warning letter, conduct a targeted roadside inspection, conduct either an off-side investigation or a focused on-site investigation, require a cooperative safety plan, issue a notice of violation, conduct a comprehensive on-site investigation similar to a compliance review (which could take several weeks) or issue a notice of claim which is a heavy fine.

The FMCSA will also determine a safety category for each carrier that has sufficient data which will be updated monthly. These categories are Continue to Operate, Marginal, and Unfit. An Unfit Suspension will prohibit a carrier from operating. These ratings will also be made public on the FMCSA website so that shippers, insurers, and other interested parties can check out a carrier's safety rating. Because they are updated monthly, one bad month can quickly change a fleet's rating. Data will be held in a fleet's record for two years and a driver's record for three. Accident information, however, will be kept on file for both fleets and drivers for five years.

If a carrier were to receive an Unfit rating, it would have 45 days for Hazardous Materials and Bus fleets or 60 days for all other carriers to improve their rating. This can be done by getting another investigation/compliance review, showing evidence of corrective action, or appealing if there are errors in the measurement data collected.

As you can see, this system will force truck and bus fleets to be more proactive in their management of drivers and perhaps their selection of drivers in the first place. Many people believe that this will create a shortage of drivers since drivers with bad records will be easily identifiable and no one will want to hire them.

One of the FMCSA's major goals is to get carriers to change their safety and compliance cultures from the ground up. To do this, fleets will have to establish policies, procedures, personnel training, and communications needed to improve their safety records. By engaging fleets early and often when an emerging problem is detected, FMCSA plans to use fleet personnel to police problems that the agency and its enforcement partners only were able to address in limited cases when those problems became too severe to ignore.

So what types of changes will fleets make? Obviously hiring standards will be elevated, more stringent disciplinary policies that address both warnings and tickets that drivers get will be developed, changes on how dispatching works may be required to better address hours-of-service issues, engine governors will be set back, and vehicle maintenance records will be improved so that all repairs are properly recorded and records are better maintained.

Since tires are the second highest category for vehicle citations following brakes, fleets must look for ways to maintain their tires better. Some fleets will set policies that will actually make drivers check tire pressures with a gauge during their pre-trip inspections. Other fleets will decide that tire pressure monitoring and/or maintenance systems are required on their equipment to help them better maintain their tires and prevent citations and out-of-service violations from occurring. Others will look to their commercial tire dealers for help in maintaining their tires better. Fleets will have to provide records of tire service work and proof that tire repairs were made which may require a change in how tire service invoices or work orders are completed and stored.

Carriers will have to be more proactive in preventing enroute tire problems since each ticket for a flat, bald, or damaged tire will be another tick mark in the "Bad" column of each fleet's CSA score card. Whatever method you choose, it will result in your fleet personnel, an outsourced tire service provider or a tire pressure monitoring solution checking tires more often.

You may think that you just have a small fleet and that the FMCSA will never find you. Well, think again. CSA is basically being run by computers that link databases from all around the country. If any fleet, big or small, has a safety problem, it will pop up on this safety rating system's radar screen.

There are three things that you can do to prepare for CSA if you have a fleet of interstate trucks or buses:

1. Check and update your records. Ensure your Motor Carrier Census Form (MSC-150) is up-to-date and accurate. Since CSA is going to weigh recent safety data more heavily than past data, fleets should get on top of their files soon and that includes updating the MCS-150 each quarter rather than the mandatory every two years.
2. Visit the CSA website. Go to [www.csa2010.fmcsa.dot.gov](http://www.csa2010.fmcsa.dot.gov) for explanations, answers to questions, tips and guidance on CSA 2010. You can sign up for an e-mail subscription to receive the most up-to-date information, obtain a full set of Frequently Asked Questions (FAQs) as well as submit your own questions.

3. Ensure compliance. Review your company's inspection and violation history for the past two years. Identify areas that need improvement and begin to address these now. Examine the processes you use to run your fleet and determine if they are a factor in any safety compliance problems. Take steps to increase your drivers' awareness that pre-trip inspections are more important than ever, that all violations count, and that their performance directly impacts their driving records and the safety assessment of your fleet. You may want to consider making qualifications for your drivers stricter, establishing a stricter company policy for the numbers of warnings and tickets drivers can get before disciplinary action is taken or terminations are made, and dropping the speed at which your trucks are governed.

CSA is definitely a force of change. It is one that presents a great opportunity for identifying the worst safety risks and getting the bad drivers and fleets that employ them off the road so that the highways are a safer place for everyone. And, it certainly puts a value on safety because if a fleet is unsafe, it's out of business. It also levels the playing field for carriers that are already spending the money to operate safely and enables fleets to value their services to embrace the real cost of truck and bus safety.