

Content Disclaimer

Due to the constantly changing nature of government regulations, it is impossible to guarantee the total and absolute accuracy of the material contained herein or presented.

J. J. Keller & Associates, Inc. and National Private Truck Council cannot and does not assume any responsibility for omissions, errors, misprinting or ambiguity contained. J. J. Keller and NPTC shall not be held liable in any degree for any loss, damage or injury caused by any such omission, error, misprinting or ambiguity present. It is made available with the understanding that J. J. Keller and NPTC are not engaged in rendering legal, accounting or other professional service. If legal advice or other expert service is required, the services of such a professional should be sought.



Copyright© 2023 All Rights Reserved



1

The Advantages and Importance of IMPROVING YOUR CSA SCORES

An Educational Webcast Sponsored by



Copyright© 2023 All Rights Reserved



2

Thank You for Joining Us!

- This webcast will cover ...
 - A regulatory overview
 - Best practices in compliance
 - A case study in implementation
 - Question & Answer session
- You will be muted during the event.
- Please use the Q&A feature to send in questions. We'll try to answer them during the Q&A period if they are not covered in the presentation.
- The slides and recording will be posted within 7 days at:
www.ijkeller.com/nptcinfo



Copyright© 2023 All Rights Reserved



3



Copyright© 2023 All Rights Reserved

4

Meet Your Speakers



Gary Petty
President & CEO
National Private Truck Council



Tom Moore, CTP
Executive Vice President
National Private Truck Council

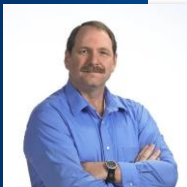


Tom Bray
Industry Business Advisor
J. J. Keller & Associates, Inc.



Jessica Tincher, CTP
Safety & Compliance Manager
Bob Evans Transportation Co LLC

5



CSA
Current and Proposed
Tom Bray
J. J. Keller & Associates, Inc.



Copyright© 2023 All Rights Reserved



6

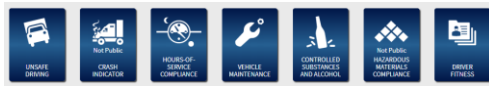
CSA

- NOT a regulation
 - Program designed to track carriers and drivers and improve safety and compliance
- SMS is the scoring mechanism
 - Uses the BASICS
- Poor scores in the SMS lead to intervention by FMCSA
 - Allows FMCSA to focus on underperforming carriers



Basic of the BASICS

- Roadside violations are assigned to a BASIC (crashes to the Crash BASIC)
 - Unsafe Driving
 - Crash
 - HOS Compliance
 - Vehicle Maintenance
 - Controlled Substances and Alcohol
 - HO Compliance
 - Driver Fitness



Basic of the BASICS

- Once assigned, violations are severity and time weighted
- Once per month, severity and time weighed violations are totaled and “normalized” to create a Measure
 - Measure is violation rate per inspection or per vehicle, with time, severity, and utilization (in the Unsafe and Crash BASIC) considered

$$\text{BASIC Measure} = \frac{\text{Total of time and severity weighted applicable violations}}{\text{Total time weight of relevant inspections}}$$

$$\text{Crash Indicator Measure} = \frac{\text{Total of time and severity weighted applicable crashes}}{\text{Average PUs x Utilization Factor}}$$

Basic of the BASICS

- Measures are compared to carriers with similar numbers of violations, crashes, or inspections to create scores
 - The score is the carrier's percentile ranking in the Safety Event Group
 - Best carrier in the group get 0, average is 50, worst gets 100
 - Like golf: The lower the better!



Copyright© 2023 All Rights Reserved



10

Pass/Fail

- BASIC Scores then compared to intervention thresholds
 - Possible interventions include:
 - Targeted for roadside inspection (ISS recommendation of "Optional" or "Inspect")
 - Warning letter
 - Focused investigation (off or on site)
 - Compliance review (full audit)

| BASIC | Intervention Thresholds | | |
|--|-------------------------|-----|---------|
| | Passenger Carrier | HM | General |
| Unsafe Driving, Crash Indicator, HOS Compliance | 50% | 60% | 65% |
| Vehicle Maintenance, Controlled Substances/Alcohol, Driver Fitness | 65% | 75% | 80% |
| HM Compliance | 80% | 80% | 80% |



Copyright© 2023 All Rights Reserved



11

Prioritization

- Monthly, FMCSA develops the "priority" list
 - Determines what carriers are considered will receive what intervention
 - Who must be audited (high risk)
 - Who they want to audit when they have time (moderate risk)
 - Who they want to see, but can wait (at risk)
 - Warning Letter or Monitor

| Criteria for Risk-Based Prioritization within Primary Lists | | | |
|---|--|--|------------------------|
| Primary List | NMS BASIC Performance | Time Since Last Intervention | Carrier Types Excluded |
| High-Risk | Two (2) or more of the following BASIC's at or above the 90 th percentile for two (2) consecutive months (passenger carriers: 1 month); Unsafe Driving, Crash Indicator, Hours-of-Service (HOS) Compliance, Vehicle Maintenance | Passenger carriers: no more comprehensive investigation in last 12 months. All other carriers: no onsite intervention in last 18 months. | None excluded |



Copyright© 2023 All Rights Reserved



12

Future Development (and an idea from the past)

- Potential to use the SMS or the data it uses to issue safety fitness determinations
 - Carriers doing badly enough would face an out-of-service order

Safety Fitness Procedures (RIN: 2126-AC52)

- FMCSA would seek:
 - Information on how the Agency might use data and resources more effectively to identify unfit motor carriers and to remove them from the Nation's roadways.
 - Public comment about the use of available safety data, including inspection data, in determining carrier fitness to operate commercial vehicles.
 - Public input on possible changes to the current three-tier safety fitness rating structure.
- The rulemaking would also include a review of the list of Federal Motor Carrier Safety Regulations (FMCSRs) that the Agency uses in its safety fitness rating methodology.



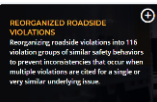
Copyright© 2023 All Rights Reserved



13

Proposed Changes

- Reorganize BASICS
 - Drug and Alcohol eliminated (violations moved to Unsafe Driving)
 - Vehicle Maintenance split into Vehicle Maintenance and Vehicle Maintenance: Driver Observed
- Scoring groups of violations, rather than independent violations
 - Same number of violations, just grouped for scoring rather than all being scored



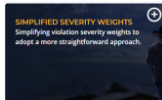
Copyright© 2023 All Rights Reserved



14

Proposed Changes

- 1 – 2 severity weights (rather than 1 – 10)
 - Example: Driver over 11-, 14-, and 70-hour limits and placed out of service for the violations
 - Currently: Each violation would receive a severity weight of 9 (7 + 2) = 27 into HOS BASIC
 - Proposed: Since all violations are in the same group and at least one was an OOS, severity weight of 2 into HOS BASIC
- Utilization factor extended to 250,000 miles (average VMT per power unit)



Copyright© 2023 All Rights Reserved



15

Proposed Changes

- Additional data sufficiency standards in some BASICS
 - No violation in the last 12 months, not scored in the HOS, Vehicle Maintenance, Vehicle Maintenance: Driver Observed, HM Compliance, and Driver Fitness
- Segmentation in Hazardous Materials and Driver Fitness
 - HM: Cargo Tank and Non-Cargo Tank carriers (over 50% of inspections determines)
 - Driver Fitness: Straight and Combination carriers (same as Unsafe and Crash)



Copyright© 2023 All Rights Reserved



16

Proposed Changes

- Proportional scores using an average of the scores in two SEGs
 - Score in current SEG
 - Scored in next-closed SEG
 - Two scores averaged to determine actual score
- New thresholds
 - Driver Fitness:
 - 80% to 90% for general carriers
 - 65% to 75% for passenger carriers
 - 75% to 85% for HM carriers
 - HM Compliance:
 - 80% to 90% for all carrier types



Copyright© 2023 All Rights Reserved



17

Where Can I Learn More about the Proposal?

- Information page:
 - <https://csa.fmcsa.dot.gov/PrioritizationPreview>
- See what your scores would be with your current data (log in required):
 - <https://csa.fmcsa.dot.gov/Login.aspx?ReturnUrl=/PrioritizationPreview/Carrier>
- See sample of carrier scores
 - <https://csa.fmcsa.dot.gov/PrioritizationPreview/Example>



Copyright© 2023 All Rights Reserved



18

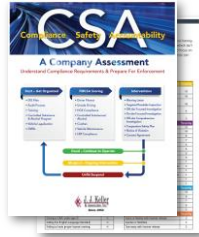
FREE CSA Assessment eBook... Ask How J. J. Keller Can Help!

J. J. Keller® CSA Performance Suite

We'll help you understand and act on the inspection, violation and crash data impacting your CSA scores.

Other Services Include:

- Driver Qualification
- Hours of Service
- DOT Drug & Alcohol
- Vehicle Tax & Licensing
- Title & Registration
- DOT Authority
- Trip Permits
- And more



Per official Board policy and practice, NPTC does not endorse or promote products and services provided by member companies which sponsor Council programs or events.

19



How Fleets Are Using CSA Scores to Improve Safety Compliance

*Tom Moore, CTP
National Private Truck Council*



Copyright© 2023 All Rights Reserved



20

The Stark Reality...

- Roadway fatalities remain flat after two years of dramatic increases
- Preliminary estimates show 42,795 died last year in motor vehicle traffic crashes essentially unchanged from the previous year
- 1.37 fatalities per 100 million VMT in 2022

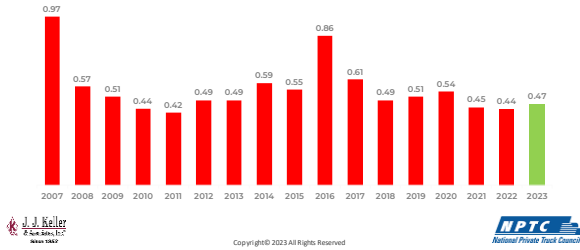


Copyright© 2023 All Rights Reserved



21

DOT Recordable Accidents



22

More on DOT Recordables

- Fleets reported they were at fault in 23% of the accidents
- They filed DATAQs 26% of the time and were successful 80% of the time



23

How Fleets Are Using CSA to Improve Safety

- Learn the BASICS
 - The SMS organizes carrier roadside inspection, crash, and investigation information into seven BASICS
 - Your safety performance affects your company's SMS results—and your Pre-Employment Screening Program (PSP) record
 - The BASICS are a good way to remember many of the safety rules you must follow



24

The Bottom Line

- CSA scores are an objective look at how your fleet is operating
- Failing to address the issues exposed by roadside inspections and CSA overall is inviting certain liability
 - While some information on CSA is not viewable by the public, it is easily obtainable by plaintiffs' attorneys
- BASIC scores can and will be used against your company in a court of law should litigation be brought as a result of an incident and if BASIC scores can bolster the plaintiff's case



Copyright© 2023 All Rights Reserved



25

Improving CSA Scores

- Get good data going into the system
 - Good data means "no violation" inspections and no preventable crashes
- Take advantage of the DataQs process: users may request the review of various types of data including:
 - crash data reflecting a CMV involved in a reportable crash;
 - data documented during a roadside safety inspection;
 - data collected during investigations;
 - registration data
- Review all roadside inspections to check for errors, contest incorrect violations
- Know and correct your problems immediately



Copyright© 2023 All Rights Reserved



26

Safety Management Best Practices

- Know your data
- Measure, monitor, manage and improve
- Develop policies, procedures and protocols
- Improve driver qualifications and hiring (as well as back office support staff)
- Communicate, educate and train



Copyright© 2023 All Rights Reserved



27

Driver Safety Bonuses

- 83% of NPTC members offer driver incentives
- Tie your program to several key CSA items such as:
 - Crashes preventable v. non-preventable
 - Violations (HOS and Moving Violations)
 - Roadside Inspections (Examples: HM Compliance, Driver Fitness, Unsafe Driving)



Copyright© 2023 All Rights Reserved



28



Bob Evans Transportation

Jessica Tincher, CTP
Safety & Compliance Manager



Copyright© 2023 All Rights Reserved



29



How Bob Evans Transportation maintains their CSA Scores

30

Bob Evans Transportation

- 150 Employees
 - Springfield, OH
 - Approx 85-90 Drivers
 - Forney, TX
 - Approx 25-30 Drivers
 - Transport BEF Products to DC's across the country
-

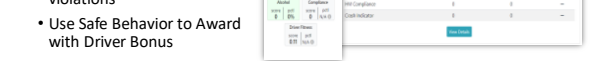


Copyright © 2023 All Rights Reserved



Safety KPI's

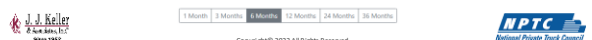
- Closely monitor all BASICS
- Closely monitor the ISS Score
- Set Goals for Annual Scores
- Report out to Corporate, Local Employees
- Train based on patterns to prevent future problems and violations
- Use Safe Behavior to Award with Driver Bonus



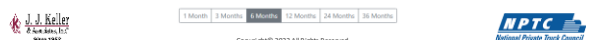
Copyright © 2023 All Rights Reserved



Unsafe Driving – Goal: 5%



Copyright © 2023 All Rights Reserved



Corrective Action



Trends

Speeding
Lane Restriction
Following Distance



What do we do?

Hands-on training
Ride-along
Defensive Driver Training

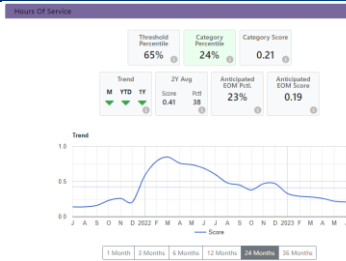


Copyright© 2023 All Rights Reserved



34

Hours of Service – Goal: Back to 0%



Copyright© 2023 All Rights Reserved



35

Corrective Action

- Trends
 - Split Sleeper Confusion
 - Keeping the Log updated and current
 - Entering in Trailer Number and Shipping info
 - Driving beyond 14-hour duty period
 - Not taking the 30 min break, as required
- Audited Logs
 - Every driver every week was audited and coached
 - Held weekly updates on the trends and how we can be a better resource to our Drivers
 - Hours of Service Refresher Training
 - Researched ELD Companies

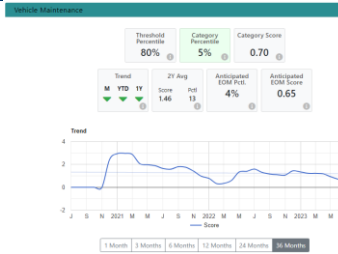


Copyright© 2023 All Rights Reserved



36

Vehicle Maintenance – Goal: 5%



37

Maintenance Violation Trends

| # | Date | Code | Description | Severity | Time Weight | YTD | ODE |
|----|------------|--------------|--|----------|-------------|-----|-----|
| 1 | 11-29-2022 | 393.75(a)(3) | Tire — flat and/or audible air leak | 10 | 2 | 20 | Y |
| 2 | 11-21-2022 | 393.45 | Brake tubing and hose adequacy | 4 | 2 | 8 | N |
| 3 | 06-29-2022 | 393.55(d)(3) | No or Defective ABS Malfunction Indicator for towed vehic... | 4 | 1 | 4 | N |
| 4 | 05-17-2022 | 393.47(e) | Clamp/Roto-Chamber type brake(s) out of adjustment | 4 | 1 | 4 | N |
| 5 | 05-17-2022 | 393.9 | Inoperable Required Lamp | 2 | 1 | 2 | N |
| 6 | 05-17-2022 | 393.45(d)(4) | Brake Connections with Leaks — Connection to Power Unit | 4 | 1 | 4 | N |
| 7 | 05-17-2022 | 393.53(b) | Automatic brake adjuster CMV manufactured on or after 10/... | 4 | 1 | 4 | N |
| 8 | 04-09-2022 | 393.9 | Inoperable Required Lamp | 4 | 1 | 4 | Y |
| 9 | 01-28-2021 | 393.75(a)(3) | Tire — flat and/or audible air leak | 10 | 0 | 0 | Y |
| 10 | 01-28-2021 | 393.9 | Inoperable Required Lamp | 2 | 0 | 0 | N |

38

Corrective Action

Evaluated Age of Equipment

- Developed a plan to lower cost by upgrading equipment
- Developed a retirement time for trucks and trailers

Evaluated the Staff

- Added a Tire Tech position to focus on Tire Safety and Condition

Created Annual Safety Rally on Inspections

- Mandatory
- Class online
- Required Hands-On Activity

39

Crash Indicator

- 5 Reportable in the last 36 months
- All Non-Preventable!
- Implemented a Defensive Driver Program and Training
- Mandatory Monthly Safety Trainings
- Customized Company Trainings on "hot topics/trends"
- Hands-On Safety Rally Activities
- Change in Culture!



Copyright© 2023 All Rights Reserved



40

Overall Changes for Safety!



Copyright© 2023 All Rights Reserved



41

Questions and Answers



Gary Petty
President & CEO
National Private Truck Council



Tom Moore, CTP
Executive Vice President
National Private Truck Council



Tom Bray
Industry Business Advisor
J.J. Keller & Associates, Inc.



Jessica Tincher, CTP
Safety & Compliance Manager
Bob Evans Transportation Co LLC

42

More Questions?



Tom Bray
Sr. Industry Business Advisor
J. J. Keller & Associates, Inc.
tbray@jjkeller.com



Tom Moore, CTP
Executive Vice President
National Private Truck Council
tmoore@nptc.org



Copyright © 2023 All Rights Reserved



43

Please Join Us Next Month!

How Fleets Are Implementing Advanced Vehicle Safety Systems to Drive Safety

August 30, 2023 – 10:00 AM Central Time

An Educational Webcast Sponsored by



Copyright © 2023 All Rights Reserved

44

THANK YOU!

Visit: www.jjkeller.com/nptcinfo
for today's presentation and to learn more about
future NPTC and J. J. Keller webcasts



2023 © All Rights Reserved



45
