

J. J. Keller & National Private Truck Council (NPTC) Webcast
CSA and the Safety Management System
Wednesday, July 12th 10 AM CST

CSA and the Safety Management System

July 12, 2017

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NPTC National Private Truck Council


CSA and the Safety Management System

This webcast will cover ...

- A regulatory overview
- The recent National Academy of Sciences' report
- A case study in implementation
- Question & Answer

Attention Attendees:

- + Thank you for attending!
- + You will be muted during the event.
- + Please use the Q&A feature to send in questions to us. 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.jjkeller.com/nptcinfo

 Gary Petty
President & CEO
National Private Truck Council

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Meet Your Presenters

 Gary Petty
President & CEO
National Private Truck Council

 Tom Bray
Industry Consultant -
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 Tom Moore, CTP
Senior Vice President
National Private
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 Carol Helnowski
Logistics Manager
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Regulatory Overview

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Industry Consultant- Transportation
J. J. Keller & Associates, Inc.




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History of CSA

- Originally “CSA 2010”
 - FMCSA started development in 2005
 - Designed to replace previous carrier audit selection tool (SAFESTAT)
 - Rolled out initially in four pilot states (CO, GA, MO, NJ) in 2008
 - Fully implemented in December of 2010
 - Name changed to just “CSA” (Compliance, Safety, Accountability) in December 2010




Tom Bray
Industry Consultant – Transportation
J. J. Keller & Associates, Inc.





Always Changing

- CSA has undergone many major and minor changes
- Previous versions include:
 - 1.0, 1.1, 1.2, 2.0 (first version used nationwide), 2.1, 2.2, 3.0, 3.0.1, 3.0.2, 3.0.3, 3.0.4, 3.0.5, 3.0.6
- Current version: 3.0.7 (April 2017)
- Continuously updating violations and associated severities
- Major changes:
 - Calculation of scores in Unsafe and Crash using VMT and segmenting (2010)
 - Cargo securement moved to Vehicle BASIC and HM BASIC created, and speeding 1 to 5 over dropped (2012)
 - Violations that are adjudicated successfully to be removed (2014)



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The 'BASICS'

- Present BASICS
 - Unsafe Driving (Part 392)
 - Crash indicator (no regulations)
 - Hours-of-service (HOS) Compliance (Parts 392 and 395)
 - Vehicle Maintenance (Parts 393 and 396)
 - Drug and Alcohol (Part 392)
 - HM Compliance (HM regulations)
 - Driver Fitness (Parts 383 and 391)




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How the BASICS Work

- Violations (or crashes) from previous two years are severity and time weighted
- Total is divided by “normalizing factor” to create BASIC Measure
 - Time weighted number of relevant inspections in five BASICS
 - Average power unit count multiplied by a utilization factor in the Unsafe Driving and Crash BASICS
- BASIC Measure is NOT the carrier’s score




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How the BASICS Work

- BASIC Measure is then compared to carriers that had roughly the same number of violations, inspections, or crashes to create score
 - Carrier score is a percentile ranking within the group
- Each BASIC has an “intervention threshold” that is based on carrier type (passenger, HM, property)
- Being above the “intervention threshold” will trigger an intervention of some type



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Do They Work?

- Certain BASICS have a significant relationship to crash involvement
 - Unsafe Driving
 - HOS Compliance
- Carriers with problems in several BASICS have high rate of crashes



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Publicly Visible Data

- Scores were visible from the creation of the system (December 2010) to December 2015 with the exception of...
 - Crash BASIC score
 - HM BASIC score (once created)
- All scores removed from public view as a result of the FAST Act
- ONLY the scores are not visible



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Still Visible

- All of the “background data” is still visible, including:
 - Number of roadside inspections (total and with violations)
 - Out-of-service rates
 - BASIC measure and trend line
 - Inspection and violation history
 - Inspection details
 - Crash summary
 - Crash details
 - Enforcement history
- Still enough there to get a fairly accurate picture of a carrier’s safety and compliance performance



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Seeing Your Scores

- If you log in using your DOT number and PIN, you can see...
 - All of your scores
 - Driver involved in the inspection or crash



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Tracking and Trending Using Data

- Violation summary in each BASIC provides...
 - Data on violation trends
 - Insight into “high frequency” and “high severity” violation
 - This is the “low-hanging fruit”
 - What future performance can be expected, if nothing is changed
 - If it is predictable, it is preventable
 - This data shows what is predictable



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The secret to low scores?

- Stop violations from occurring
 - In five BASICs “good” inspections (ones with no violations in the BASIC) help the score
 - In the other two BASICs (Unsafe Driving and Crash) reducing violations allows time weighting process to reduce score
 - Less coming into the “time factor 3” group
 - It takes 3 outgoing violations to offset each new one!




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Beyond Compliance

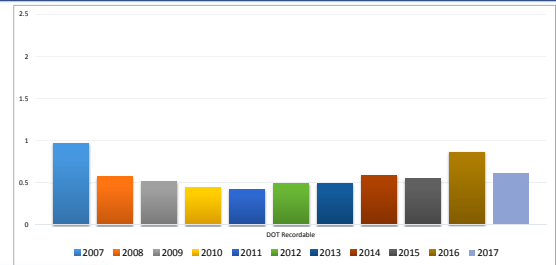
Tom Moore, CTP
 Senior Vice President
 National Private Truck Council



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 National Private Truck Council





Safety Performance





DOT recordable

■ 2007 ■ 2008 ■ 2009 ■ 2010 ■ 2011 ■ 2012 ■ 2013 ■ 2014 ■ 2015 ■ 2016 ■ 2017




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CSA Performance Scores

| | Unsafe Driving | Fatigued Driving | Driver Fitness | Controlled Substance | Vehicle Maintenance | HazMat | Crash |
|------|----------------|------------------|----------------|----------------------|---------------------|--------|-------|
| 2012 | 12.8 | 17.9 | 17.77 | 1.7 | 24.91 | 19.78 | 22.14 |
| 2013 | 11.3 | 13.46 | 11.9 | 0.99 | 20.86 | 1.06 | 29.8 |
| 2014 | 12.1 | 10.9 | 10.7 | 0.91 | 20.8 | 1.94 | 27.2 |
| 2015 | 11.9 | 12.9 | 13.0 | .05 | 21.9 | 1.3 | 22.3 |
| 2016 | 14 | 12 | 6.3 | .12 | 18 | 1.7 | 25.7 |
| 2017 | 9 | 10 | 7 | .8 | 17 | 2.6 | 20 |



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The Stark Reality...

- Fatal crashes involving a large truck increased from 3,429 in 2014 to 3,598 in 2015. Injury crashes involving large trucks also increased, from 82,000 in 2014 to 83,000 in 2015.
- 2016 data from the [National Safety Council estimates](#) that as many as 40,000 people died in motor vehicles crashes last year, a 6% rise from 2015. This is a 14% increase in deaths since 2014, the biggest two-year jump in more than five decades.
- It also means that 2016 is the deadliest year on U.S. roads since 2007, the NSC says



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In Addition.....

- 4.6 million people injured in vehicle accidents in 2016
- NSC estimates the cost of motor-vehicle deaths, injuries, and property damage in 2016 was \$432 billion, a 12% increase from the previous year.
- Those costs include losses in wages and productivity, medical expenses, property damage, employer costs and administrative expenses, the NSC says.



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NAS Report on SMS

- Study and report mandated by Congress in 2015
- FMCSA has 120 days to review report and submit Corrective Action Plan to Congress and DOT Inspector General; FMCSA has said it will incorporate all of the recommendations in the report
- NAS found that SMS data used to identify motor carriers at high risk for future crashes is "conceptually sound," even if it is incomplete
- NAS recommended that FMCSA should develop a more detailed data-driven statistical model to identify high risk motor carriers for enforcement actions



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NAS Report

- Report cited problems with carrier exposure and crash data
- Current exposure data are missing with high frequency, and data that are collected are likely of unsatisfactory quality
- NAS recommended collecting higher-quality VMT data and also collecting this information by state and by month, perhaps using ELD data or IRP mileage
- Also noted crash data are often missing or inconsistently reported to the FMCSA
- Report recommended that FMCSA should support the states in collecting more complete crash data, and in universal adoption of the Model Minimum Uniform Crash Criteria



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Safety Management

- Know your data
- Measure, monitor, manage and improve
- Policies and procedures
- Qualifications and hiring
- Roles and responsibilities
- Communication
- Training



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Improving CSA Scores

- Get good data going into the system
- Good data means "no violation" inspections and no preventable crashes, more "no violations noted" inspections are a good thing
 - Review all roadside inspections to check for errors, contest unrighteous violations on Data Q's
 - Know and correct your problems immediately



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What Happens If You Find Inaccurate Data?

- Access DataQs from the SAFER website, the SMS website or at:
<https://dataqs.fmcsa.dot.gov/login.asp>
- Challenges are reviewed by the state that entered the data, with federal oversight.
- 65% of challenges are successful
- Can appeal to state motor carrier safety office if you do not like the results of a challenge.



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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



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The Fleet Perspective

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Logistics Manager Safety/Compliance
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Meijer, Inc. Fleet Operations

- Fleet profile
 - 220 Power Units
 - 2,100 Trailers
 - 300 CDL Drivers
 - 25+ million miles
- Network
 - 5 Distribution facilities
 - 3 Manufacturing facilities
 - 237 stores




Carol Heinowski
Logistics Manager Safety/Compliance
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Know Your DOT Data

- SAFER
 - safer.fmcsa.dot.gov/CompanySnapshot.aspx
 - Carrier census information
 - Inspection OOS rates compared to National Averages over last 24 months
 - Carrier crashes over last 24 months
 - Carrier Safety Fitness Rating
 - Flag if Carrier is Prohibited from Operating




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Know Your DOT Data

- SMS
 - ai.fmcsa.dot.gov/SMS/
 - Carrier census information
 - 36 months of inspection, intervention and crash data (including identification of serious violations)
 - BASIC percentile rankings and over threshold notice
 - Data download functionality
 - Informational materials on improving BASIC percentile rankings
- Compass Portal
 - portal.fmcsa.dot.gov
 - Daily, un-scored roadside inspection and crash data
 - Access to other FMCSA sites



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SAFER Screenshot – Access to Company Snapshot

U.S. Department of Transportation
Federal Motor Carrier Safety Administration
Safety and Fitness Electronic Records (SAFER) System

Company Snapshot

The Company Snapshot is a concise electronic record of a company's identification, size, commodity information, and safety record, including the safety rating (if any), a roadside out-of-service inspection summary, and crash information. The Company Snapshot is available via an ad-hoc query (one carrier at a time) free of charge.

Search Criteria

Users can search by DOT Number, MCMX Number or Company Name.

USDOT Number
 MCMX Number
 Name

Enter Value:

SAFER Home | Feedback | Privacy Policy | USA.gov | Freedom of Information Act (FOIA) | Accessibility | RSS Feeds | Help | Policies and Important Links | Plug-in

Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE, Washington, DC 20020 • 1-800-833-6389 (toll-free) • 405-471-8200 (toll-free) • Fax: 202-366-0500

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SAFER Screenshot – Carrier Snapshot

ID Operations | Inspections/Crashes in US | Inspections/Crashes in Canada | Safety Rating

US Inspection results for 24 months prior to: 06/29/2017

Total Inspections: 41
Total ROP Inspections: 32

Note: Total inspections may be less than the sum of vehicle, driver, and haulmet inspections. Go to [inspections](#) page for further information.

| Inspection Type | Inspection Status | | | | OP |
|------------------|-------------------|--------|-------|---------------|----|
| | Vehicle | Driver | Fleet | Not Inspected | |
| Inspections | 28 | 11 | 2 | 0 | 0 |
| Out of Service | 0 | 0 | 0 | 0 | 0 |
| Out of Service % | 0% | 0% | 0% | 0% | 0% |
| Not Inspected % | 28.72% | 3.51% | 4.50% | N/A | |

Crashes reported to FMCSA by states for 24 months prior to: 06/29/2017

Note: Crashes listed represent a motor carrier's involvement in reportable crashes, without any determination as to responsibility.

| Type | Fatal | Injury | Property | Total |
|----------|-------|--------|----------|-------|
| Overseas | 0 | 0 | 0 | 0 |

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SMS Screenshot – Login

Check Motor Carrier Safety and Performance Data

Learn about SMS

Help Center

Data current as of: May 26, 2017
How do I request my record?
 Contact Me of July 20, 2017
 Renewal Schedule

There are 3 million truck and bus drivers sharing the road with more than 250 million motorists. With stakes so high, it's essential that everyone Get Road Smart. We can't do it without you.

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SMS Screenshot – Login

Compass Portal Screenshot – Login

Know YOUR Data – and Others


- In addition to using these systems to check on your fleet's data, they can be used to look up dedicated carriers your company may use, for-hire inbound carriers, etc.
- Meijer uses 3 dedicated carriers in addition to our Private Fleet. I check for the following:
 - Safety rating
 - OOS rates (driver and vehicle)
 - Roadside inspections
 - Crashes

The footer includes a photo of Carol Heinowski, her title 'Logistics Manager Safety/Compliance Meijer, Inc.', and logos for NPTC and J.J. Keller & Associates, Inc.



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Challenge Inaccurate Data through DataQ's

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Challenge Inaccurate Data through DataQ's


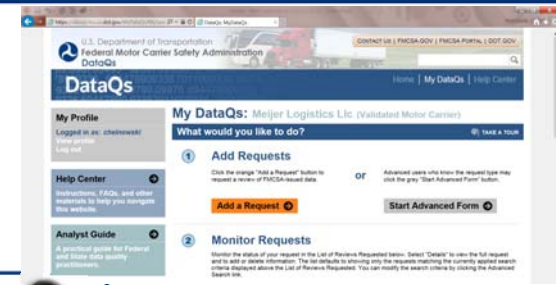
- Don't bother with challenging Non-preventable accidents--they will not be removed.
- Submit additional documents to back up your claim.
- Tickets that have been adjudicated can also be challenged so that the violation can be updated with the new information.





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DataQs Screenshot – Challenge List



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Internal Auditing

- Start with areas that you have a high CSA score, and/or serious violations that could lead to accidents
- Then go back and look at company policies and procedures that address all areas of the FMCSR's.
 - Note – only one policy is required by regulation (Part 382), but DOT will look for management controls via your internal policies and procedures to ensure compliance.



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Internal Auditing – Part 382

- If you are struggling in this area, the best practice is to use a 3rd Party consortium
 - Random drug and alcohol testing
 - MRO Services
 - Some may help with required training and policy
- Meijer is large enough that we have an HR Department that runs our D&A program; however, as the Safety/Compliance Manager, I have to stay on top of it to ensure my drivers are in compliance.



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Logistics Manager Safety/Compliance
Meijer, Inc.



Internal Auditing – CDL and Medicals

- Don't assume that the drivers will remember to renew their medicals and CDL's on time.
- You are responsible for their compliance.
- Have a "tickler" file to notify you of expirations.
- Meijer has two systems:
 - A 3rd party online system notifies us of expirations
 - Our dispatch system also does 30-day notifications and will not allow a dispatcher to assign a trip to a driver that still has an expired medical or CDL.



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Internal Audit – DQ Files

- Run MVR's and annual reviews at the same time each year.
- Meijer utilizes a 3rd party system – all DQ documents are scanned into the program allowing for easy reporting of incomplete files and upcoming expirations.



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Internal Audit – Hours of Service

- First and foremost – the Safety and Operation departments HAVE to be on the same page
- A culture of Safety and Compliance has to come from the top
- Focus on critical violations first – then worry about form and manner
- Electronic logs –
 - Our logbook violations went to zero
 - False logs become a thing of the past
 - Weekly audits take two minutes



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Internal Audit - Maintenance

- Ensure proper training on pre and post-trip inspections
- Follow up on DVIR write-ups
- Keep accurate maintenance records
- Look for patterns – this will help guide you on where to focus



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Question & Answer Session



Gary Petty
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More Questions?



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Thank you for participating!

Please join us for our next webcast:

Roadside Inspections
July 13th at 10 AM CST

Visit www.jkkeller.com/nptcinfo for more information



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Thank you for participating in today's webcast!

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