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

Meet Your Presenters
Regulatory Overview

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

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

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)
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)

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

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
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

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

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
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

Tracking and Trending Using Data

- Violation summary in each BASIC provides...
  - Data on violation trends
  - Insight into "high frequency" and "high severity" violations
    - 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

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!
J. J. Keller & National Private Truck Council (NPTC) Webcast

**CSA and the Safety Management System**

Wednesday, July 12th 10 AM CST

---

**Beyond Compliance**

Tom Moore, CTP

Senior Vice President

National Private Truck Council

---

**Safety Performance**

---

**CSA Performance Scores**

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

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.

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
J. J. Keller & National Private Truck Council (NPTC) Webcast

CSA and the Safety Management System

Wednesday, July 12th 10 AM CST

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

Safety Management

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

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
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.

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

The Fleet Perspective

Carol Heinowski
Logistics Manager Safety/Compliance
Meijer, Inc.
**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

**Know Your DOT Data**

- SAFER
  - [safer.fmcsa.dot.gov/CompanySnapshot.aspx](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

- SMS
  - [ai.fmcsa.dot.gov/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](portal.fmcsa.dot.gov)
  - Daily, un-scored roadside inspection and crash data
  - Access to other FMCSA sites

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
Challenge Inaccurate Data through DataQ’s

- Access DataQ’s 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

---

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.

---

DataQs Screenshot – Challenge List
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.

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.

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.
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.

Carol Heinowski
Logistics Manager Safety/Compliance
Meijer, Inc.

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

Carol Heinowski
Logistics Manager Safety/Compliance
Meijer, Inc.

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

Carol Heinowski
Logistics Manager Safety/Compliance
Meijer, Inc.
Question & Answer Session

Gary Petty
President & CEO
National Private Truck Council

Tom Bray
Industry Consultant—Transportation
J. J. Keller & Associates

Tom Moore, CTP
Senior Vice President
National Private Truck Council

Carol Heinowski
Logistics Manager
Safety/Compliance
Meijer, Inc.

More Questions?

Tom Bray
Industry Consultant—Transportation
J. J. Keller & Associates
tbray@jjkeller.com

Tom Moore, CTP
Senior Vice President
NPTC
tmoore@nptc.org

Thank you for participating!

Please join us for our next webcast:

Roadside Inspections
July 13th at 10 AM CST

Visit www.jjkeller.com/nptcinfo for more information

Thank you for participating in today’s webcast!

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