Slide 1

Understanding & Improving
Your CSA Scores

An Educational Webcast Sponsored by

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Slide 2

Thank You for Joining Us!

- This webcast will cover …
  - A regulatory overview
  - Best practices in compliance
  - A case study in implementation
  - Question & Answer
- 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.jjkeller.com/nptcinfo

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Slide 3

Meet Your Presenters

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CSA – What Is It and How Does It Work?

Tom Bray
J. J. Keller & Associates, Inc.

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CSA – What is it?

- FMCSA's audit selection tool
- Uses data to determine which carriers should be subjected to an intervention

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CSA – How Does it Work?

- Data collected
  - Roadside inspections and violations
  - DOT recordable crashes
  - Results of audits and investigations

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CSA – How Does it Work?

- Scoring
  - Carriers' violations and crashes are divided up into BASICs
    - **Unsafe driving** (Parts 390, 392, and 397)
    - **Crash Indicator** (DOT-recordable crashes – Ones found "not-preventable" in the CPDP are not used in the scoring)
    - **Hours-of-Service Compliance** (Parts 392 and 395)
    - **Vehicle Maintenance** (Parts 393 and 396)
    - **Controlled Substances and Alcohol** (Parts 382, 390, and 392)
    - **Hazardous Materials Compliance** (HMRs)
    - **Driver Fitness** (Parts 383 and 391)
  - Note: Not all violations are used (only ones tied to safety)

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CSA – How Does it Work?

- Scoring
  - Within each BASIC:
    - Carrier's violations and crashed are severity weighted (1 to 10)
    - Carrier's violations and crashes are time weighted (1 to 3)
    - Once a month severity and time weighted violations are totaled and "normalized"
      - Divided by the average number of power units multiplied by a utilization factor based on mileage (Unsafe and Crash), or
      - Divided by the time weighted number of relevant inspections
  - Number creates is the "BASIC Measure"
    - This is your number!
    - This is the number you always want to see going down

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CSA – How Does it Work?

- Final score ("Percentile Ranking")
  - Within each BASIC:
    - BASIC Measures are compared to carriers with similar on-road exposure
      - Number of violations, crashes, or inspections used to create Safety Event Groups
    - Carrier(s) with best measure score is 0
    - Carrier(s) with worst measure score is 100
    - All other carriers assigned percentile tanks between these extremes

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CSA Interventions

- Carrier scores are compared to "thresholds" in the BASICs
  - Thresholds vary based on BASIC and type of carrier (Passenger, HM, and General)

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%

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CSA Interventions

- Over threshold in BASICs leads to intervention
  - Targeted roadside enforcement – "Optional" or "Inspect" in ISS
  - Warning letter
  - Focused investigation
    - Off-site
    - On-site
  - High risk carriers placed on priority list (full compliance review)
- Bottom Line:
  - If you have been over a threshold for two to three months, and have not received a warning letter, you are on the Focused or Priority list and are in line for an audit

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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

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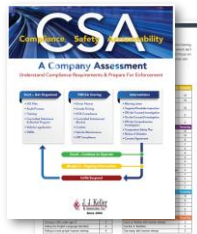
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CSA Secrets

- To avoid being selected:
  - Reduce or eliminate violations at the roadside
    - Sound safety practices, and track and adjust
  - Reduce or eliminate DOT-recordable crashes
    - Sound safety practices, and track and adjust
  - Review your data and use DataQs to remove poor inspections or crashes should not be there
  - Be familiar with the Safety Management Cycle

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CSA Rumors

- The reports of CSA's death have been greatly exaggerated
  - FMCSA working on a replacement using IRT Model
  - Having trouble with getting it to work, in the meantime continuing to update existing SME-based methodology
  - Whatever system they use, the secret will remain the same:
    - Your violations and crashes will drive up your score(s)
    - Reducing or eliminating violations and crashes is what will drive your scores down

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How Fleets Are Using CSA Scores to Improve Safety Compliance

Tom Moore, CTP
National Private Truck Council

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The Stark Reality…

- NHTSA released figures last year that showed the biggest six-month increase recorded in the Fatality Analysis Reporting System's history – 20,160 people died in motor vehicle crashes in the first half of 2021, up 18.4% from 2020.
- Preliminary data from the Federal Highway Administration show vehicle miles traveled (VMT) in the first half of 2021 increased by about 13%. The fatality rate for the first half of 2021 increased to 1.34 fatalities per 100 million VMT, up from the projected rate of 1.28 fatalities per 100 million VMT in the first half of 2020.
- These alarming statistics follow preliminary estimates of increases in crash fatalities in 2020. While Americans drove less in 2020 due to the pandemic, NHTSA's early estimates show an estimated 38,680 people died in motor vehicle traffic crashes—the largest projected number of fatalities since 2007. This represents an increase of about 7.2% as compared to the 36,096 fatalities reported in 2019.

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Behavioral Research Into Crash Factors

- Occupant ejection (up 20%)
- Unrestrained occupants of passenger vehicles (up 15%)
- On urban interstates (up 15%)
- On urban local/collector roads (up 12%)
- In speeding-related crashes (up 11%)
- On rural local/collector roads (up 11%)
- During nighttime (up 11%)
- During the weekend (up 9%)
- In rollover crashes (up 9%)
- In single-vehicle crashes (up 9%) and
- In police-reported alcohol involvement crashes (up 9%)

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DOT Recordable Accidents

2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
0.97	0.57	0.51	0.44	0.42	0.49	0.49	0.59	0.55	0.86	0.61	0.49	0.51	0.54	0.45	0.44

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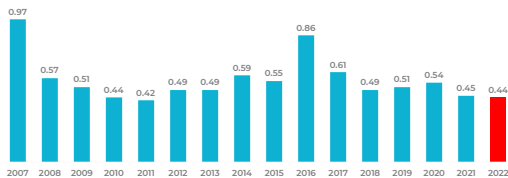
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More On DOT Recordables

- Fleets reported they were at fault in 27% of the accidents
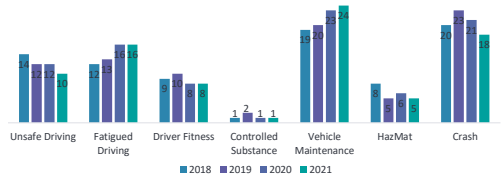- They filed DATAQs 27% of the time and were successful 50% of the time

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CSA Scores

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The Crash Preventability Determination Program (CPDP)
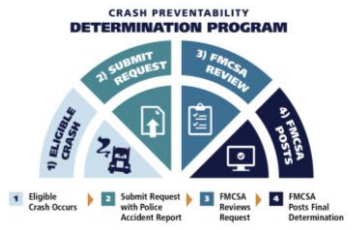
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Safety Management

- 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
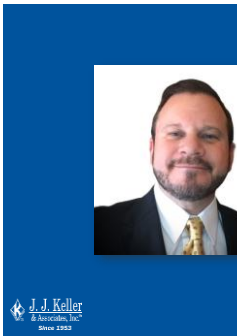
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A Fleet's Perspective

David Fontana, CTP
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AutoZone®

- AutoZone is a fortune 300 company and leading retailer and distributor of automotive replacement parts and accessories in the U.S.
- Founded on July 4, 1979 and based in Memphis Tennessee
- Today AutoZone operates over 6,000 stores across the United States, Mexico and Brazil
- Annual Sales $15 billion

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AutoZone Supply Chain Transportation

- 10 Distribution Centers in U.S. covering 4.35 million sq. ft.
- Resources 372 Tractor and 900 Trailers
- Drivers = 500+
- 48 Million miles driven per year by private fleet
- 9,000+ Deliveries a week

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What is CSA

- FMCSA launched its Compliance, Safety, Accountability (CSA) program on December 13, 2010. The program is designed to improve large truck and bus safety and ultimately reduce crashes.
- The centerpiece of CSA is the Safety Measurement System (SMS), which analyzes all safety-based violations from inspections and crash data to determine a commercial motor carrier's on-road performance.
- SMS evaluates the safety of individual motor carriers by considering all safety-based roadside inspection violations (not just out-of-service violations) and State reported crashes, using 24 months of performance data.

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Raising Safety Standards

- CSA's Three Elements
  1. **The Safety Measurement System (SMS)**
     - Improves how FMCSA prioritizes carriers for interventions
     - Includes more safety data; all safety-based violations found during roadside inspections
     - Organizes safety behaviors into seven Behavior Analysis and Safety Improvement Categories (BASICs)
  2. **Interventions Process**
     - Creates new, more efficient ways for FMCSA to interact with carriers and help bring them into compliance (e.g., warning letters and Onsite Focused Investigations)
  3. **Safety Fitness Determination (SFD)**
     - Current safety rating process requires an Onsite Investigation

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CSA

- 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

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CSA Details

- The 7 BASICs incorporate violations of the Federal Motor Carrier Safety Regulations (FMCSRs) and the Hazardous Materials Regulations (HMRs), and are organized to focus on behaviors that may cause or increase the severity of crashes
  - **Unsafe Driving BASIC**—Operation of (CMVs) in a dangerous or careless manner. Examples: speeding, reckless driving, improper lane change, texting while operating a CMV, not wearing safety belts.
  - **Crash Indicator BASIC** (not publicly available)—Historical pattern of crash involvement, including frequency and severity. This BASIC is based on information from State-reported crashes that meet reportable crash standards. *Crashes found to be not preventable by FMCSA's Crash Preventability Determination Program (CPDP) will be listed on the SMS Website as "Reviewed – Not Preventable," but excluded from a carrier's measure and percentile in the Crash Indicator BASIC.*
  - **HOS Compliance BASIC**—Operation of CMVs by drivers who are ill, fatigued, or in noncompliance with the HOS regulations. This BASIC includes violations of regulations pertaining to records of duty status (RODS) as they relate to HOS requirements and the

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CSA Details - Continued

- The 7 BASICs focus on behaviors that may cause or increase the severity of crashes
  - **Vehicle Maintenance BASIC**—Failure to properly maintain a CMV and prevent shifting loads, spilled or dropped cargo, and overloading of a CMV. Examples: inoperative brakes, lights, and other mechanical defects, improper load securement, failure to make required repairs.
  - **Controlled Substances/Alcohol BASIC**—Operation of CMVs by drivers who are impaired due to alcohol, illegal drugs, and misuse of prescription or over-the-counter medications. Examples: use or possession of controlled substances or alcohol, failing to implement an alcohol and/or controlled substance testing program.
  - **HM Compliance BASIC** (not publicly available)—Unsafe handling of HM on a CMV. Examples: failing to mark, label, or placard in accordance with the regulations, not properly securing a package containing HM, leaking containers, failing to conduct a test or inspection on a cargo tank when required by the United States Department of Transportation (U.S. DOT).
  - **Driver Fitness BASIC**—Operation of CMVs by drivers who are unfit to operate a CMV due to lack of training, experience, or medical qualifications. Examples: failing to have a valid and appropriate commercial driver's license (CDL), being medically unqualified to operate a CMV, failing to maintain driver qualification files.

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Driver Safety Bonuses

- We tie our program to several key CSA items examples are:
  - Crashes preventable v. none preventable
  - Violations (HOS and Moving Violations)
  - Roadside Inspections (Examples: HM Compliance, Driver Fitness, Unsafe Driving)

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DataQs

- DataQs is the online system for drivers, motor carriers, Federal and State agencies, and others to file concerns about Federal and State data maintained in MCMIS and released to the public by FMCSA.
  - Provides an Internet website to accept RDRs and supporting documentation (fax and/or file upload capability).
  - Acknowledges receipt of RDRs (Request for Data Review)
  - Notifies FMCSA and/or State personnel when RDRs are received.
  - Accepts FMCSA and/or State postings and responses related to RDRs.
  - Provides automated notification capability including receipt of input and status changes.
  - Provides reporting capability based on pre-set parameters.
  - Tracks RDRs from submission through resolution
- Visit FMCSA's DataQs Website: https://dataqs.fmcsa.dot.gov/

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Valid DataQs

- DataQs system 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;
  - data included in complaints filed against household goods (HHG) carriers via the National Consumer

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Filing a DataQs

- Must register and file DataQs on the FMSCA DataQ portal:
  - Very important that all information is included upfront
  - Process can take 3-6 weeks or longer for a ruling
  - Crash DataQs tend to carry the highest scores and focus (none preventable)
    - Police Report (all pages)
    - Accident Report (all pages)
    - Drug and Alcohol (test results – for fatalities)
    - Video clips (if available)
    - Pictures (if available)
  - Vehicle Maintenance should be a focus (rental and lease)
    - Owner is responsible for maintenance
  - Important to know if additional data request made you have 14 days to respond.

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Crash Types Accepted

- Struck in the Rear
- Struck on Side at Rear
- Wrong Direction
- Illegal Turns
- Failure of Other Vehicle to Stop
- Under the Influence
- Medical Issue / Distracted Driving
- Equipment Debris / Animal Strike

- Cargo / Infrastructure Failure
- Suicide
- Parked or Legally Stopped
- Rare and unusual

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New Crash Types Added

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Ineligible Crash Types

Struck in side at rear | Wrong direction | Failure of other vehicle to stop | Legal Turns

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Working on DataQs

- Constantly monitor your CSA report and violations
  - Remember information and details are easier to recall the sooner they are addressed.
  - Review all collision reports for accuracy and correctness of event.
  - Hazmat (Placard violations and resolution)
- Benefits
  - Reviewed & Deemed Not Preventable collisions will be visible in your CSA profile, as annotations to your crash report and as annotations for drivers on their PSP reports.
  - Improve CSA scores by contesting not preventable collisions
  - An opportunity for Drivers to have their record corrected too

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Get Connected

- Visit the Driver Safety Education Center at:
  http://csa.fmcsa.dot.gov/?driversafety

- Sign up for important updates via the CSA Website at:
  http://csa.fmcsa.dot.gov/subscription.aspx

- Contact FMCSA if you have questions or feedback at:
  http://csa.fmcsa.dot.gov/CSA_Feedback.aspx or by calling 877-254-5365

- View SMS results on FMCSA's public website: http://ai.fmcsa.dot.gov/sms

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Question and Answer Session

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More Questions?

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