


Managing Your CSA Scores

May 14th, 2014



Managing Your CSA Scores

This webcast will cover ...


- The new regulatory environment
- How FMCSA is looking at improving the regulation
- How fleets are using CSA to monitor and improve their safety performance
- Question & Answer



Moderator
Dr. Gary Petty, President & CEO, NPTC

Panelists
Tom Bray, Sr. Editor – Transportation Management, J. J. Keller & Associates, Inc.
Tom Moore, CTP, Senior Vice President, NPTC
Kris Wylie, CDS, Fleet Safety and Compliance Manager, Univar.


Attention Attendees:


- + Thank you for attending!
- + The presentation will start in a few minutes at 10:00 AM Central.
- + You will be muted during the event.
- + Please use the Question feature to text questions to "Q & A". 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: <http://www.jjkeller.com/nptcinfo>






Dr. Gary Petty President & CEO National Private Truck Council







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Introduction



- Regulations – Tom Bray
- Policy and Procedure Best Practices – Tom Moore, CTP
- Univar's Program – Kris Wylie
- Housekeeping issues:
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 - If you lose sound at any point, you can dial-in by phone using the number and Pass Code listed below.
 - If you lose the program window and need to re-login be sure to enter a different e-mail address to avoid being denied access for multiple logins.





Thomas Bray
Sr. Editor, Transportation Management
J. J. Keller & Associates, Inc.






CSA Overview


What is it?

- It is an enforcement system to track, measure, monitor, and evaluate carrier (and driver) compliance and safety
- Used to select carriers for warning or investigation
 - Carriers that score poorly are selected for "interventions"
- It is NOT new regulations



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CSA Overview

CSA process:


- Data collection
- Safety Measurement System (SMS)
- Safety Evaluation (Fitness Determination) based on SMS scores (BASIC scores)
- Comprehensive and progressive interventions



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CSA Data

Data collection:


- Roadside inspections
- DOT-recordable crashes
- Investigations



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CSA Measurement

SMS

- Uses seven “BASICS” (Behavior Analysis and Safety Improvement Categories) to analyze carriers
- Measures safety performance using all safety-based violations listed in “severity tables” discovered during roadside inspections, violations discovered during investigations, and crashes




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CSA Measurement


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Seven BASICS

- Unsafe Driving (Parts 392, 397, etc.)
- Hours-of-Service Compliance (Parts 392 and 395)
- Driver Fitness (Parts 383 and 391)
- Controlled Substances/Alcohol (Part 382 and 392)
- Vehicle Maintenance (Parts 392, 393, and 396)
- Hazardous Materials Compliance (HM regulations)
- Crash Indicator

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CSA Measurement


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BASIC scoring process overview: Carriers are "Measured" and then compared (Scored)

- Relevant intervention, inspection, violation, and crash data assigned to the carrier
- Violations and crashes are classified into the correct BASIC
- Events are time weighted and severity weighted (valued)
- BASICS are totaled and normalized (BASIC Measure)
- Carriers are grouped into "Safety Event Groups" based on number of events and then compared
- Percentile rank within SEG group assigned (this is the "BASIC Score")

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CSA Measurement


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Safeties built in

- Maximum of 30 severity points in each BASIC from one inspection
- Stacking provision — in case of multiple violations of same regulation, only counted once
- Data sufficiency requirements — must be enough data on the carrier to be scored in a BASIC

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CSA Evaluation


- Carrier scores are then compared to "intervention thresholds" in all BASICs
- Thresholds based on carrier type and BASIC

BASIC	Passenger Carriers	HazMat Carriers	Property Carriers
Unsafe Driving HOS Crash	50	60	65
Driver Fitness Drug and Alcohol Vehicle	65	75	80
HM	80	80	80




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CSA Evaluations

- Below all thresholds, no action taken
 - Carrier can still be investigated for a complaint, based on a crash or series of crashes, based on outcome of previous investigation, or carrier request
- Above the threshold, carrier can expect an intervention of some type
- Well over 50 percent of all carrier investigations are initiated based on CSA BASIC Scores alone



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CSA Interventions

Interventions

- Warning letter
- Targeted roadside enforcement (ISS recommendation of "Optional" or "Inspect")
- Focused off-site investigation
- Focused on-site investigation
- Comprehensive review (compliance review)
- Cooperative (corrective) safety plan
- Notice of Violation
- Notice of Claim/Settlement Agreement





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Tom Moore, CTP
Senior Vice President
National Private Truck Council






Private Fleet CSA Performance



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	Unsafe Driving	HOS	Driver Fitness	Controlled Substance	Vehicle Maint.	HazMat	Crash
2012	12.8	17.9	17.77	1.7	24.91	19.78	22.14
2013	10.96	13.35	13.44	0.96	21.22	1.36	30.4
2014	11.5	6.5	5.0	0	18	2.6	13.3





Safety Management



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- Policies and Procedures
- Qualifications and Hiring
- Roles and Responsibilities
- Communication and Training
- Measure, Monitor, Manage and Improve




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Behind the Numbers

- **Violations are what get carriers in trouble**
 - Violations are what are scored
 - Good inspections help off-set the violations in most BASICS!
- **Industrywide violation problems**
 - **Vehicle Maintenance BASIC has the most violations in it**
 - Lights, tires, brakes most common
 - **HOS BASIC has the most carriers in trouble**
 - Form and manner, log not current, over 14 hours most common




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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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Improving CSA Scores

Get good data going into the system

- Good data means “no violation” inspections and no preventable crashes
- Review all roadside inspections to check for errors
- Know what the industry problems are in each BASIC
- Know what YOUR problems are in each BASIC

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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.
- Be sure to upload supports for your argument

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Kris Wylie

Fleet Safety and Compliance Manager
Univar

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About Univar

- Univar is a global chemical distributor, distribute over 4,500 chemical products.
- Univar USA is the leading chemical distributor in the United States, providing more chemical products and related services than any other company in the marketplace.
- Univar USA operates 102 locations across the U.S. including Puerto Rico, Hawaii, and Alaska.
- Primary industries serviced include oil and gas, pharmaceutical, environmental science, water treatment, cosmetic, agriculture, and food ingredients.
- Univar is heavily regulated at state and federal levels.



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Univar USA Private Fleet

- 42nd largest private fleet in the US according to Transport Topics top 100 list
- 802 Driver/791 tractors/1400 trailers
- Our fleet is 95% day cabs
- We have centralized services at the corporate level
- We operate with ELD 85% of our fleet
- 43% of our tractors are leased/57% owned equipment
- Average age of our tractor is 7 years old
- All company drivers
- Turnover is less than 3% per year



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Univar CSA – First Steps

1. Educate our teams on CSA
2. Monthly updates to executive management, branch managers and all levels of management in between
3. Benchmark every month against competitors
4. Set yearly goals at corporate level, regional/district level, and branch level
 - Utilize a third party vendor
5. Drive improvement in specific areas (actionable information)
 - Send out top ten violations for company
 - Send out a list of all inspections monthly (good & bad)
 - Evaluate and investigate any large increases in scores



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Vehicle Maintenance

- Do good pre and post trip inspections- visual violations
- Top violations are brakes, lights, tires
- Verify repairs and hold your providers accountable
- Full service leasing programs
 - Provide basic repairs and services into the cost of the lease
 - Make budgeting easier for equipment costs
 - Your maintenance records can be maintained by your provider
- Use CSA data for decision making when reviewing your asset replacement schedule
- Technology
- Utilize EVIR - Electronic Vehicle Inspection Report
- Vehicle diagnostic tools – these tools can evaluate and notify if there are issues with equipment




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Driver Fitness

- Majority of red flag violations are ties to Controlled Substance and Driver Fitness
- Audit your DQ program – violations at the scale should trigger internal audit process
 - Don't assume your third party vendor is keeping you compliant
 - By FMCSR's the carrier is still responsible
- Reporting process to catch expiring documents 90,60, 30 prior to expiration
 - Escalate the reporting to upper management non-compliance for expiring documents
- Pull your MVR more than once a year
- Utilize quality clinics and require driver to use those clinics for their DOT physicals
 - New medical examiners registry will help




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Unsafe Driving

- Speed limiters on your equipment
 - New regulation coming out
 - All ready widely utilized in the industry
- Disciplinary policies need to be in place and applied consistently
- Require training for drivers who are cited for unsafe driving behaviors
- Technology
- Utilize technology (speeding, lane departure, in cab cameras, hard braking notifications)
- Act quickly – immediate corrective actions available



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Crash Indicator

- Safety controls in place for the other 6 BASIC's will keep this percentage down
- This BASIC accounts for both preventable and non-preventable (FMCSA feasibility study)
- All accidents should be an opportunity for growth – talk about it
 - Safety Alerts: one page summary of what happened, lessons learned, immediate actions
- Dispute crashes that are not DOT recordable through the DataQs process
- Track near misses and events to prevent future DOT accidents
- Remember drivers are at the most risk for accident in the beginning and in end of their career
- **Technology**
- Event recorders, capture the 30 seconds before the event and 60 seconds post event.
(Not Public)



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Controlled Substance

- Majority of red flag violations fall under Controlled Substance if not under Driver Fitness
- Zero tolerance policy
- Policy should be more restrictive than the minimal DOT requirements
- Be clear on your hiring policies and stand by them



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Hazardous Materials

- Placards are a visual violation
 - Use quality placards and replace prior to deterioration
- Make sure the driver has the Emergency Response Guide and is trained on how to use it efficiently
- Paperwork should be accessible and organized per requirements in FMCSR
- Double check endorsements on driver's license at time of hire and renewal
(Not Public)



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Hours of Service Compliance



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- Become knowledgeable of the new HOS regulations
- Paper logs and ELD – apply corrective actions for false logs and over hours violations given at the scales
- Operate an ELD- know your provider
 - All providers are not created equal
 - Providers are not responsible for the data
 - Make sure drivers can provide the information (cab card)to inspectors on how to use the tablet
- Inspectors are becoming more ELD savvy

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HOS Compliance - Technology



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Benefits of ELD

- Lower driver falsification
- Time card system for driver
- Dispatcher/operations more effectively utilize the driver
- Real time reporting
- Messaging capabilities
- Utilization of equipment
 - MPG, total miles, is the equipment running everyday
- Customization for the customers needs

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Tips for Data Q




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- Handle disputing violations at the corporate level
- Only dispute when you are able to prove your case
- Have documentation to dispute the violations
 - Shop receipt from the same day or within a few days
 - Towing receipts, statement from tow company, repair invoices, pictures
- The burden of proof is on the carrier


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Summary of Strategies for Success




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- Create a safety culture
- Compare your CSA numbers to your competitors
- Create friendly competition between locations, drivers, management – post CSA points
- Get executive management to support in writing
- PSP report – avoid drivers with bad habits
- Pre Trip and Post Trip – DVIR/EVIR
- Utilize bypass systems (PrePass, Norcross, Greenlight)
- Rewards systems for successful, compliant drivers
- Required CSA training for drivers when hiring and annually
- Utilize technology






SMS Preview




Kris Wylie
Univar

Three objectives of the new SMS site


1. Provide easier, more intuitive navigation and user-friendly features to clarify the SMS's role as FMCSA's prioritization tool for CSA interventions
2. Provide a "one-stop-shop" for FMCSA safety information
3. Retain and provide easy access to detailed information and new performance monitoring tools





SMS Preview – Sample Carrier

- Safety rating, insurance, carrier details, and intervention status is on main page



Sample Carrier 2
U.S. DOT# 2332
Address 333 Any Street
Anytown, MA 02030
Number of Trucks: 18
Number of Drivers: 14

Safety Rating
As of 05/04/2014 (updated daily)
Not Rated
Rating Date:

Licensing and Insurance
As of 05/05/2014 (updated hourly)
Active For Hire Authority
Type: Yes/No: / /
Private: Yes/No: / /
Passenger: No/Yes: / /
Hazardous Goods: No/Yes: / /
Broker: No/Yes: / /

Note: This is a sample carrier profile created to demonstrate the features of the SMS Preview. No actual motor carrier data is used for the sample profiles. Any similarity to a real motor carrier is coincidental.

BASIC Status (public view)
Behavior Analysis & Safety Improvement Categories (BASICs)
Based on a 24-month record ending April 25, 2014

DRIVER LICENSE	CARGO INDICATOR	HOURS OF SERVICE COMPLIANCE	VEHICLE MAINTENANCE	CONTROLLED SUBSTANCES	INSURANCE	DRIVER FITNESS

Select a BASIC icon to view additional details.

⚠️ Denotes this carrier exceeds the FMCSA intervention threshold relative to its safety event grouping based upon available data and/or has been cited with one or more serious violations within the past 12 months during an investigation. Therefore, this carrier may be prioritized for an intervention action and license suspension.

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SMS Preview – Sample Carrier

- Page one continued of preview
- This shows summary, carrier registration, penalty history

Summary of Activities
The summary includes information on the five most recent investigations and 24 months of inspections and crash history.

Carrier Registration
Carrier Registration Details
Subject to Hazmat Threshold
Update Registration Info

Penalties History
As of 05/04/2014 (updated daily)
No penalties found

Tools/Resources
Print-Ready Measurement Profile for U.S. DOT# 2222
Carrier History
SMS Methodology
How to Improve

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Univar

SMS Preview – Univar Vehicle Maintenance

- We will be able to view other carriers in our safety event group
- The CSA percentage for the BASIC is not shown on front screen
- Additional graphs and charts available

BASIC Vehicle Maintenance
ON ROAD INVESTIGATION
On Road Performance
Performance Measure: 1.45
Performance Percentile: 17.4%

PERFORMANCE MEASURE OVER TIME
MEASURE
NOV 20 2013
DEC 27
JAN 24 2014
FEB 21
MAR 28
APR 25

MEASURE VS. PERCENTILE
INSPECTION RESULTS
Vehicle Make: Univar/Gen. GM
Vehicle Inspection: L238
Vehicle Name: Service/Univar 8

Question & Answer Session

Gary Petty
National Private Truck Council

Tom Moore
National Private Truck Council

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


Kris Wylie
Univar

Please continue to submit your questions.

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Closing Remarks

- Checkout the archive of past topics at:
<http://www.jjkeller.com/nptcinfo>
 - PowerPoint slides and recording up in 1 week
- Remaining topics for 2014:
 - July 23, 2014 – How to Survive a DOT Intervention
 - October 22, 2014 – Regulatory Update



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in today's webcast!**

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