



**Gary Petty**President & CEO
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# 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.jjkeller.com/nptcinfo

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# Meet Your Speakers



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





# Audience Poll: How often do you log in to the SMS to review your scores and other data? Weekly • Monthly · Quarterly or on occasion • Help! I have never logged in Compliance Safety Accountability • Not a regulation or group of regulations • Enforcement tool used to select carriers for intervention • On-road performance generates the scores in CSA's Safety Measurement Roadside inspections (compliance with the FMCSA Safety Regulations) • Crashes • Past enforcement action violations also considered Current Methodology – The BASICs • Safety-related events are divided into BASICs Unsafe Driving (Part 392) • Crash (DOT-recordable crashes) Hours-of-Service Compliance (Part 395) Vehicle Maintenance (Parts 393 and 396) Controlled Substance (Drug) and Alcohol (Parts 382 and 395) Hazardous Materials Compliance (HMRs) • Driver Fitness (Parts 383 and 391)

# Current Methodology – Time and Severity • Each safety related violation on a roadside inspection reports is assigned to a BASIC and then: • Severity weighted (1 to 10 - plus 2 if violation resulted in OOS order) • Time weighted (1 to 3) · Violation total value is severity weight multiplied by time weight • Crash BASIC works the same way; each DOT-recordable crash is: • Severity weighted (1 to 3) • Time weighted (1 to 3) Crash total value is severity weight multiplied by time weight 10 Current Methodology - Monthly Calculations • Once a month a BASIC Measure is calculated in each BASIC • Time and severity violations are totaled • This total is then divided by a "normalizing factor" to create the BASIC Measure · Normalizing factors Unsafe and Crash: Average number of power units multiplied by a utilization factor Other BASICs: Total of time weighted relevant inspections (driver, vehicle, or HM) Time weighting 1 to 3 11

# Current Methodology – Monthly Calculations

- BASIC Measures are then compared to other carriers with similar on-road exposures (Safety Event Groups)
  - Unsafe: Number of inspections with a violation and vehicle type (straight or combo)
  - Crash: Number of crashes and vehicle type (straight or combo)
  - HOS, Vehicle, Drug and Alcohol, HM, and Driver Fitness: Number of relevant inspections







# Current Methodology – Final Score

- Unsafe and Crash BASICs Safety Event Groups segmented by vehicle type (straight versus combo straight = 30% straight vehicles)
- Carrier in the Safety Event Group with best BASIC Measure (lowest) given score (percentile rank) of "0"
- Carrier in the Safety Event Group with worst BASIC Measure (highest) given score (percentile rank) of "100"
- All others ranked between these two extremes based on their BASIC Measure
- If you are above 50, you are below average for your group







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# Intervention Thresholds

- Scores are then compared to Intervention Thresholds
- To "pass," must be below the threshold in all BASICs

BASIC	Intervention Thresholds			
BASIC	Passenger Carrier	нм	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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# Consequences

- $\bullet$  BASIC over the threshold, something is going to happen
- The more BASICs over the threshold and the higher the scores in those BASICs, the more severe the intervention
  - Targeted roadside inspections (ISS of Optional or Inspect)
  - Warning letter
  - Focused investigation when resources are available
  - Compliance review or focused investigation as soon as possible
  - Compliance review within 90 days







# Proposed New Methodology • BASIC reorganization • BASICs become Compliance Categories • Vehicle Maintenance BASIC split into: Vehicle Maintenance – Maintenance-related defects Vehicle Maintenance: Driver Observed – Defects a driver could see during a walkaround-type pretrip Drug and Alcohol BASIC eliminated and violations moved to Unsafe Driving

· All operating while OOS moved to Unsafe Driving Category







# Proposed New Methodology

- Violation scoring changes
- Violations to be scored based on "groups," not each individual violation
  - 2,000 current violations put into roughly 100 groups
  - Example:
  - Driver over 11-, 14-, and 60/70-hours limits during an inspection
     All in the same Violation Group, so scored as one violation
- Violation severity weights either 1 or 2
  - 1 Not an OOS or disqualifying violation (Unsafe Driving)
  - 2 One of the violations in the group resulted in an OOS order or was a disqualifying





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# Proposed New Methodology

- Calculating Measures and Scores
  - Updated Utilization Factors in Unsafe and Crash
  - Not scored if no violation in the last 12 months in HOS, Vehicle Maintenance, Vehicle Maintenance: Driver Observed, HM, and Driver Fitness
  - Expanded segmentation
    - HM segmented into cargo tank versus non-cargo tank (50% cutoff)
    - Driver Finess segmented into straight versus combo (same as Unsafe and Crash)
  - Final score in each Compliance Category based on average of score in current Safety Event Group and next nearest







# Proposed New Methodology • Intervention threshold changes $\ ^{-}$ New intervention thresholds in Driver Fitness and HM Driver Fitness Compliance Category 80% to 90% for general carriers 75% to 85% for hazardous material (HM) carriers 65% to 75% for passenger carriers Hazardous Materials Compliance Category 80% to 90% for all carriers Proposed New Methodology • Did not choose Item Response Theory (IRT) Model • Using same structure • Date for implementation not know • For now, carriers can see scores in current SMS and preview of scores in new SMS methodology 20 Premise is NOT Changing • Crashes and roadside inspections violations are still being measured and scored monthly • Crash and roadside issues will still lead to intervention • If you have more or more severe crashes and violations than similar carriers, you will likely end up the subject of an intervention • "Passing" still means being below the threshold in all Compliance Categories

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roadside inspection violations

• Bottom line: Still need to take proactive actions to prevent crashes and



# Best Practices in Fleet Compliance

**Tom Moore, CTP** National Private Truck Council







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# Let's Begin With the Premise....

- CSA is not perfect
- It's the best thing we have to:
  - Measure performance
  - Improve performance
- Provides a valuable dashboard
- Gets bad actors off the road
- Proposed changes should make it more effective







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# **CSA Scores**

	Unsafe Driving	Fatigued Driving	Driver Fitness	Vehicle Maintenance	Crash Indicator	Controlled Substances & Alcohol	Hazardous Materials
2024	12	14	9	26	23	1	3
2025	10	9	10	24	16	1	2



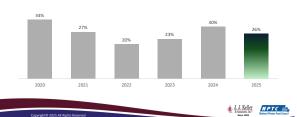




# DOT Recordable Accidents 0.57 0.51 0.44 0.42 0.49 0.59 0.55 0.61 0.49 0.51 0.54 0.45 0.45 0.45 0.47 0.52 0.49 0.20 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025

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# Percent of The Accidents In Which The Fleet Was at Fault



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# CSA: A Valuable Dashboard

- 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







# Improving CSA Scores – Short Term Actions

- 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
- Know and correct your problems immediately





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# Improving CSA Scores – Long Term Strategies

- Know your data
- Measure, monitor, manage and improve
- · Improve driver hiring processes
- Communicate, educate and train
- Use the data to target and improve training
- Driver safety bonuses
  - Crashes preventable v. non-preventable
  - Violations (HOS and Moving Violations)
  - Roadside Inspections (Examples: HM Compliance, Driver Fitness, Unsafe Driving)





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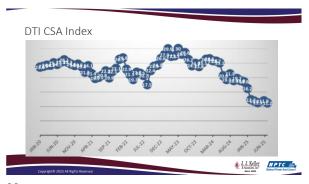


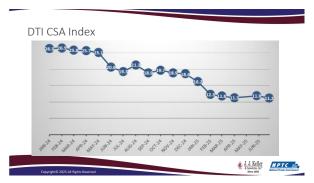
Tim Eckhardt, CTP Sr. Director of Safety Dot Transportation Inc.













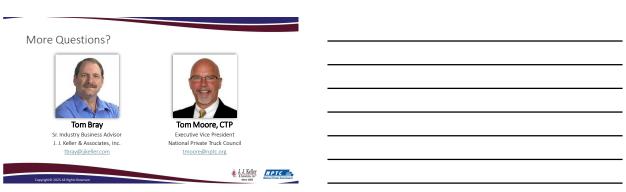




# CSA Incentive Plans • Do you pay for clean inspections? • Developed a quarterly Safety/CSA bonus plan Driver can earn over \$4500 annually by qualifying • Review program annually (Increase \$'s and Qualifiers) • Continue to add incentive programs as needed (Safety/MPG) Keep it simple and easy to understand for everyone Driver Safety/CSA Quarterly Bonus • Qualifiers: CSA score of 10 or below No Preventable accidents in quarter Minimum Income requirement 38 DataQs • Have an owner • Be proactive on entering Data Q's • Track results









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