

# Are you and your drivers getting ready for CSA 2010?

## Comprehensive Safety Analysis (CSA)

Are you and your drivers familiar with the new CSA 2010 enforcement program the Federal Motor Carrier Safety Administration (FMCSA) is in the process of initiating? If not, it's time to get with the program. CSA is a high priority Federal Motor Carrier Safety Administration initiative that will increase the efficiency and effectiveness of the FMCSA's motor carrier compliance and enforcement program. The ultimate goal of CSA 2010 is to achieve a greater reduction in large truck and bus crashes, injuries and fatalities.

### Carrier

Much like the present SafeStat system, carriers' on-road performance and compliance history will be tracked. All DOT recordable crashes, roadside inspection reports, and data from safety audits will be collected by the FMCSA, just like they are now. However, when looking at roadside inspection reports, the CSA 2010 system will use ALL violations noted to calculate a carrier's score, not just the out-of-service violations. One other change is that the CSA 2010 system will use seven narrow Behavioral Analysis Safety Improvement Categories (BASICs) rather than four broad Safety Evaluation Areas (SEAs). By "slicing the data narrower" (seven BASICs rather than four SEAs) and using more data (using all violations rather than just out-of-service violations), the FMCSA believes they will have a better view of problems a carrier may be having.

The seven BASICs are:

- Unsafe driving (violations of traffic laws and Part 392)
- Fatigued driving (violations of Parts 392 and 395)
- Driver fitness (violations of Parts 383 and 391)
- Controlled substances and alcohol (violations of Parts 382 and 392)
- Vehicle maintenance (violations of Parts 393 and 396)
- Cargo (violations of Subpart I of Part 393 and hazardous materials regulations)
- Crash history

If any of the BASIC scores exceed a "threshold," the carrier will be subject to interventions. The interventions include:

- Warning letter
- Additional roadside enforcement
- Focused off-site investigation
- Focused on-site investigation
- Comprehensive review (the equivalent of the present Compliance Review)
- Cooperative safety plan
- Notice of Violation
- Notice of Claim

The final intervention, determining the carrier "Unfit" and ordering them to suspend operations, has to wait for the accompanying regulations (the rest of CSA 2010 does not need to wait for the regulations).

## **Drivers**

Drivers will be subject to the same BASIC process. Any crashes or roadside inspection violations reported to the FMCSA will be entered into the system, and BASIC scores generated. If any of the BASIC scores are above the threshold, the driver can be subject to interventions.

### **What can you do?**

First, start tracking your roadside inspection violations (whether you are a carrier or driver). The scoring inside each BASIC will be based on the severity of the violations and crashes, and when the violations and crashes occurred (called "severity and time weighted").

Second, start being more active in challenging violations that you feel are not legitimate (here again, whether you are a driver or carrier). State motor carrier safety offices, the Commercial Motor Vehicle Safety Alliance (CVSA), and the FMCSA DataQs system all provide challenge mechanisms.

Finally, you need to start making sure that you only have good data going into the FMCSA data collection system. Once the change is made to CSA 2010, all carrier data in the system for the last 24 months, and all driver data in the system from the last 36 months will be used. Getting good data in is accomplished by reducing the frequency and severity of DOT recordable crashes, and getting more "No Violations Discovered" roadside inspection reports.

As a carrier, how do you accomplish this? By actively training your drivers on roadside inspections, safe driving, staying qualified and in good condition when driving (correctly licensed and medically qualified, not ill or fatigued, not in violation of the hours of service regulations, and not under the influence), vehicle inspection, cargo securement, and defensive driving (preventing crashes — all crashes count so it is critical that drivers avoid accidents, not just "not cause them").