
CSA 2010

A Broker's Eye View

Inside:

What is CSA 2010?

How will CSA 2010 affect the trucking industry?

How will CSA 2010 affect Brokers and 3PLs?

What is a safe carrier?

Safety review of all current carriers

Preparing for CSA 2010?

- Prior to July
- After CSA 2010 roll out

CSA 2010 Primer

CSA 2010 Safety Measurement System

- Behavioral Analysis Safety Improvement Categories (BASICS)

CSA 2010 Interventions

At-a-glance comparison

What is CSA 2010?

CSA2010 is a new safety measurement system being implemented by the Federal Motor Carrier Safety Administration (FMCSA). Its purpose is to reduce commercial motor vehicle (CMV) crashes, fatalities, and injuries. CSA 2010 does not change the current process of inspections to determine on-the-road performance but it does differ from the current SafeStat model in three distinct ways:

- CSA2010 is a more comprehensive measurement system that will reach a greater portion of commercial carriers
- CSA 2010 decouples Safety Ratings from the Compliance Review process. Under this new program, a carrier's Safety Fitness determination (SFD) will be determined mainly by its on-the-road performance (requires rulemaking)
- Instead of relying on compliance reviews, CSA 2010 contains a broader array of specific interventions aimed at improving carrier safety in target areas

The FMCSA began field testing CSA 2010 in February 2008 starting with selected motor carriers in Georgia, Missouri, New Jersey, and Colorado. They have since expanded the program to include carriers in Montana, Minnesota, Kansas, Maryland and Delaware.

Full roll-out of the program is expected to start in July 2010 with the replacement of the current SafeStat system. Between July and December, the FMCSA will train enforcement agencies and begin sending out warning letters to carriers nationwide.

In order to implement the new Safety Fitness Determination process, the FMCSA must go through a notice and comment rulemaking. The Agency anticipates publishing a final rule by May 2010. However, if the rulemaking is delayed, CSA 2010 will be deployed using the current compliance review process.

How will CSA 2010 affect the trucking industry?

The consensus among those most familiar with the new measurement system is that it will cause a lot of confusion in the near term and will ultimately reduce the amount of available truck capacity on the road.

According to an article published in Transport Topics on March 1, 2010, FMCSA Administrator Anne Ferro told the American Trucking Associations that "there are going to be some snafus along the way" to full implementation of CSA 2010.

CSA*2010

A BETTER WAY TO
MEASURE MOTOR CARRIER
SAFETY AND TO HELP ALL
CARRIERS AND DRIVERS
IMPROVE THEIR SAFETY
PERFORMANCE



In the first few months, carriers that are unprepared for the change may struggle to comply with new intervention processes and to correct bad scores or bad data. Many carriers that have had good scores in the past will be caught off guard. The FMCSA weighs recent violations more heavily than ones that occurred up to two years ago, it will therefore take six months or more for carriers to improve their scores.

Under the CSA 2010 SMS, a carrier's safety fitness determination will be closely tied to driver performance on the road, forcing many to scrutinize and focus on individual driver behaviors. In March the FMCSA introduced their Pre-Employment Screening Program (PSP) which will enable carriers to assess individual operators' crash and safety violation history as a pre-condition for employment. It is assumed that, over time, these changes will have the effect of weeding out bad drivers from the market. While this is obviously a good thing for the safety of all road users, it could significantly reduce the pool of available drivers and limit available truck capacity.

A further blow to truck capacity comes in the form of the FMCSA's new, stricter carrier entrant audit that automatically fails new carriers if they have committed any of 15 violations. In the past very few companies failed the audit. The FMCSA estimates that 47.9% of carriers that passed during the last five years would have failed under the new rules. At the current rate of 40,000 audits each year, that's 19,000 fewer motor carriers entering the market each year.

How will CSA 2010 affect Brokers and 3PLs?

The most obvious change that brokers will need to make in the wake of CSA 2010 will be to adapt their carrier qualification process. Unlike today's system, in which a carrier's safety rating can remain unchanged for years, the new process will re-calculate SFDs for an estimated 175,000 carriers every month. This is a significantly larger number than the approximately 12,000 carrier compliance reviews completed annually under the current system. Brokers will therefore need to place greater emphasis on checking carrier safety prior to dispatch.

The ideal qualification process will prevent any member of your organization from dispatching a carrier that falls below a predetermined threshold. To do this you will either need to check the carrier's SFD every time you offer them a load, or use an automated method for monitoring changes to safety data.

Before changing your qualification process, we recommend that you acquire a firm understanding of the new safety measurement system. A primer on the new measurement system is included in this document. You can also visit the FMCSA's CSA2010 web site (csa2010.fmcsa.dot.gov) for more detailed information.



IN TEST TODAY

Beginning with Minnesota and Montana in May 2009, a few new states are joining the test prior to full implementation. All carriers in the new states are evaluated using the CSA 2010 Safety Measurement System and are addressed using the new intervention process.

The CSA 2010 Operational Model Test completion date is June 2010, and the program is expected to be implemented in 2010.

You will then need to set the bar for acceptable safety performance. In a similar manner to the SafeStat scoring system, carrier BASICS are ranked into percentiles that compare the safety performance of each carrier with that of its peers. Within each peer group, percentiles are computed on a scale of 0 –100, with 100 indicating the worst performance.

Until all carriers have been evaluated under this new system, it is difficult to know where to draw the line between acceptable and unacceptable safety performance. Due to the differences in measurement technique, carriers that may previously have fallen into inspection category E (not a high priority to receive a Compliance Review) may now find themselves with one or more BASIC scores that are a cause for concern. Carriers that have maintained a satisfactory safety rating for years may now be subject to an intervention.

What is a safe carrier?

Under CSA 2010 rules the Safety Fitness Determination (SFD), determines what, if any, interventions the FMCSA will take against the carrier or driver. Once a carrier’s BASICS are calculated, interventions are determined using two thresholds: the Intervention threshold and the Unfit (failed) threshold. The threshold is not the same for each basic. In a recent listening session the FMCSA told attendees that scores above the intervention threshold would be marked in yellow and those above the 97% mark would appear in red.

The rules for awarding the Safety Fitness Determination are:

SFD	Threshold
Continue to Operate	All BASICS must be below intervention thresholds
Marginal	Awarded if any of the BASIC scores are above the intervention level
Unfit	Awarded if the Unsafe Driving or Fatigued Driving BASICS or any two of the other BASICS are above the Unfit Threshold

Obviously, brokers should avoid using any carrier that qualifies for an “Unfit” SFD, but it is probably unrealistic to limit your business to carriers that are below the intervention threshold for all BASICS. Each brokerage will need to decide where to set their level for acceptable performance based on business criteria. A high standard will reduce the total number of carriers you will be able to use. A lower standard will increase risk. Until more data is available, it is probably best to err on the side of caution and be prepared to change your carrier qualification policy as needed

MEASUREMENT

On-Road Safety Performance
(BASICS)

- Unsafe Driving
- Fatigued Driving (Hours-of-Service)
- Driver Fitness
- Controlled Substances/Alcohol
- Vehicle Maintenance
- Cargo-Related
- Crash Indicator

Intervention Findings

- Essential Safety Management Violations
- Fundamental Violations

Safety Review of all Current Carriers

Since carrier safety evaluations may literally change over night, we recommend that brokers perform a safety evaluation on all of the carriers as soon as the CSA2010 safety data becomes available. Carriers that fail the new standards should be temporarily suspended in your carrier database until their scores improve.

Preparing for CSA 2010

Prior to July:

1. Learn all you can about the new safety measurement system
2. Revise your safety standards for dispatch
3. Update your carrier qualification process (in writing)

After CSA 2010 roll-out:

4. Train employees on new carrier qualification process
5. Conduct a review of all current carriers and temporarily suspend those that are below par
6. Monitor the new process and make adjustments as needed

CSA 2010 Primer

CSA 2010 Safety Measurement System

BASICS

The new safety measurement system groups safety related behaviors into seven Behavioral Analysis Safety Improvement Categories (BASICS). It is important to note that all violations noted during an inspection will be used, not just those resulting in an Out of Service condition. These are not tied to citations or convictions.

Unsafe Driving BASIC includes violations for following too close, speeding, lane changing, passing and turning, careless/reckless driving and improper rail road crossing

Fatigued Driving BASIC (Hours of Service) includes violations for operating a CMV when ill, fatigued, or being out of compliance with HOS regulations regarding log books



Driver Fitness BASIC includes violations for driving without a license, multiple licenses, driving while under age or operating a CMV while unfit due to lack of training, experience or medical qualifications

Controlled Substances/Alcohol BASIC includes violations for driving while impaired due to illegal drugs or alcohol, possession of drugs and alcohol in the vehicle, consumption of alcohol within 4 hours of duty and misuse of prescription or over-the-counter medications

Vehicle Maintenance BASIC includes violations for failure to properly maintain a CMV such as improper lighting, inadequate marking, problems with brakes, tires, suspension or steering, and failure to make required repairs

Improper Loading/Cargo Securement BASIC includes violations for failing to properly prevent shifting loads, spilled or dropped cargo, overloading, unsafe handling of hazardous materials, cargo size and weight, and hazardous material handling

Crash Indicator BASIC includes all DOT recordable crashes regardless of whether they were preventable or whether the driver was found to be at fault. Crashes involving injuries or fatalities are weighted more heavily. This score is based on a comparison to other carriers and not number of accidents.

INTERVENTION

Early Contact

- Warning Letter
- Carrier Access to Safety Data and Measurement
- Targeted Roadside Inspection

Investigation

- Offsite Investigation
- Onsite Investigation – Focused
- Onsite Investigation – Comprehensive

Follow-on

- Cooperative Safety Plan
- Notice of Violation
- Notice of Claim
- Operations Out-of-Service Order

There are four basic steps in the process of calculating a carrier's performance in each BASIC:



When calculating each BASIC, the system takes into account the severity of the violation and how long ago it occurred and then normalizes the result by the number of inspections or power units.

Severity weights range from 1 (less severe) to 10 (most severe) based on the likelihood of its causing a crash. Driver or vehicle OOS violations incur additional weight.

Time weights range from 1 (for violations between 12 and 24 months old) to 3 (for violations less than 6 months). This places more emphasis on recent violations.

Normalization differs depending on the type of BASIC. Fatigued Driving and Driver Fitness measures are divided by the number of driver inspections. Vehicle Maintenance and Improper Loading measures are divided by the number of vehicle inspections. Unsafe Driving, Controlled Substances/Alcohol, and the Crash Indicator measures are normalized based on the number of Power Units. Note: the number of miles driven is not part of the equation.

Percentile rankings are assigned by comparing each carrier's scores to those of its peers, and a percentile rank is assigned. Unlike SafeStat, the new SMS groups carriers into peer groups that are based on the size of their fleet. It does not separate carriers by their type. Percentiles range from 0 –100 with 100 indicating the worst performance.

CSA 2010 Interventions

The CSA 2010 intervention system is designed to alert carriers to safety problems earlier so they can be corrected before crashes occur. The CSA2010 intervention process can be triggered by:

- One or more deficient BASICs
- A high crash indicator
- A complaint or fatal crash

The type of intervention is influenced by the level of safety performance, the presence of hazardous materials and any prior intervention history. Based on the risk posed by the carrier, the interventions increase in severity and degree of interaction. Carrier interventions (listed in increasing severity) are:

1. Warning letter
2. Targeted roadside inspection
3. Off-site investigation
4. Focused on-site investigation
5. Cooperative safety plan
6. Notice of violation
7. Comprehensive on-site investigation
8. Notice of claim/settlement agreement
9. Unfit-suspension

At-a-glance Comparison

Current SafeStat and Safety Rating System	CSA 2010 Safety Measurement System
<p>Organized into four general Safety Evaluation Areas (SEAs).</p> <ul style="list-style-type: none"> • Accident • Driver • Vehicle • Safety Management 	<p>Divided into seven “Behavioral Analysis Safety Improvement Categories” (BASICs)</p> <ul style="list-style-type: none"> • Unsafe driving • Fatigued driving, based on Hours of Service (HOS) compliance • Driver fitness • Controlled substance or alcohol • Vehicle maintenance • Improper loading of cargo • Crash indicators (not be available to the public.)
Uses only out-of-service violations and selected moving violations	Uses all safety-based inspection violations
Violations are not weighted based on relationship to crash risk	Violations are weighted based on relationship to crash risk
Has no impact on the safety rating other than to signal the need for a compliance review	Will directly impact the safety fitness determination of the carrier (after rulemaking process is complete)
Does not assess individual drivers	Contains two distinct safety measurement systems, one for carriers and one for commercial drivers
Compliance Review is an on-site, one-size fits all review of safety management resulting in a safety rating	Interventions are tailored to specific deficiencies and may include warning letters, off site investigations, on-site investigations, cooperative safety plans, violation notices, and if necessary, Operation Out-of-Service orders
All carriers are considered equal in the calculation of percentiles	Percentiles are organized by peer group, so carriers are compared with others experiencing similar exposure to inspection
<p>Safety Ratings are a direct result of a compliance review and can remain in effect for years. They have no relation to on-the-road performance by the carrier. Safety ratings awarded as part of this process are:</p> <ul style="list-style-type: none"> • Satisfactory • Conditional • Unsatisfactory 	<p>The new Safety Fitness Determinations incorporate on-road safety performance in addition to major safety violations found as part of the investigation process. They are re-calculated every month. New SFDs are:</p> <ul style="list-style-type: none"> • Continue to Operate (no interventions) • Marginal (subject to interventions) • Unfit (correct immediately or cease operations)