

Danger on the Highway

Could CSA 2010 be the Answer?

by Pete Hanley

In August 2008, an unlicensed charter bus crashed in Texas after blowing a retread tire mounted on a steering axle, killing 17 people. The use of retread tires on steering wheels violates federal regulations. The owner of the bus had been denied a federal license earlier that month due to an unsatisfactory regulatory review.

An Arkansas motor carrier was cited in May 2007 for nine safety violations, including lack of proper licensing and failure to maintain driver qualification files. The following month, a new carrier bearing the same business address, phone number and owner information began service—and by March 2009 was ordered to cease operations due to a large number of safety violations.

Drivers for a California bus company refused to take mandatory drug tests, leading to the company's citation for 18 safety violations in May 2007. The carrier was fined and, subsequently, made an attempt to correct some of the problems but did not pay the fine. Instead, they formed a new company with the same name, address, etc. in October 2007. Eventually, the old company was put out of business by the Federal Motor Carrier Safety Administration (FMCSA).¹

These are but a few examples of dangerous operating situations that can be found throughout the transportation industry. In an effort to avoid needless accidents and death, the FMCSA instituted a new Comprehensive Safety Analysis known as CSA 2010.

The CSA 2010 initiative is designed to make it easier for the FMCSA, state agencies and the carrier industry to achieve the following three objectives:

1. Communicate with carriers and drivers
2. Increase the amount and quality of performance measurement data to better identify high-risk behaviors
3. Supply recommendations to correct high-risk behaviors before they become bad habits²

Additionally, this initiative provides the opportunity for the FMCSA to institute new processes to deal with the safety and performance of motor carriers and drivers.³

The CSA 2010 website offers these answers for the questions asked most frequently by motor carriers and drivers:

What is CSA 2010?

CSA 2010 is a major FMCSA initiative to improve the effectiveness of FMCSA's compliance and enforcement programs. Its ultimate goal is to achieve a greater reduction in large truck and bus crashes, injuries and fatalities, while making efficient use of the resources of FMCSA and its state partners.

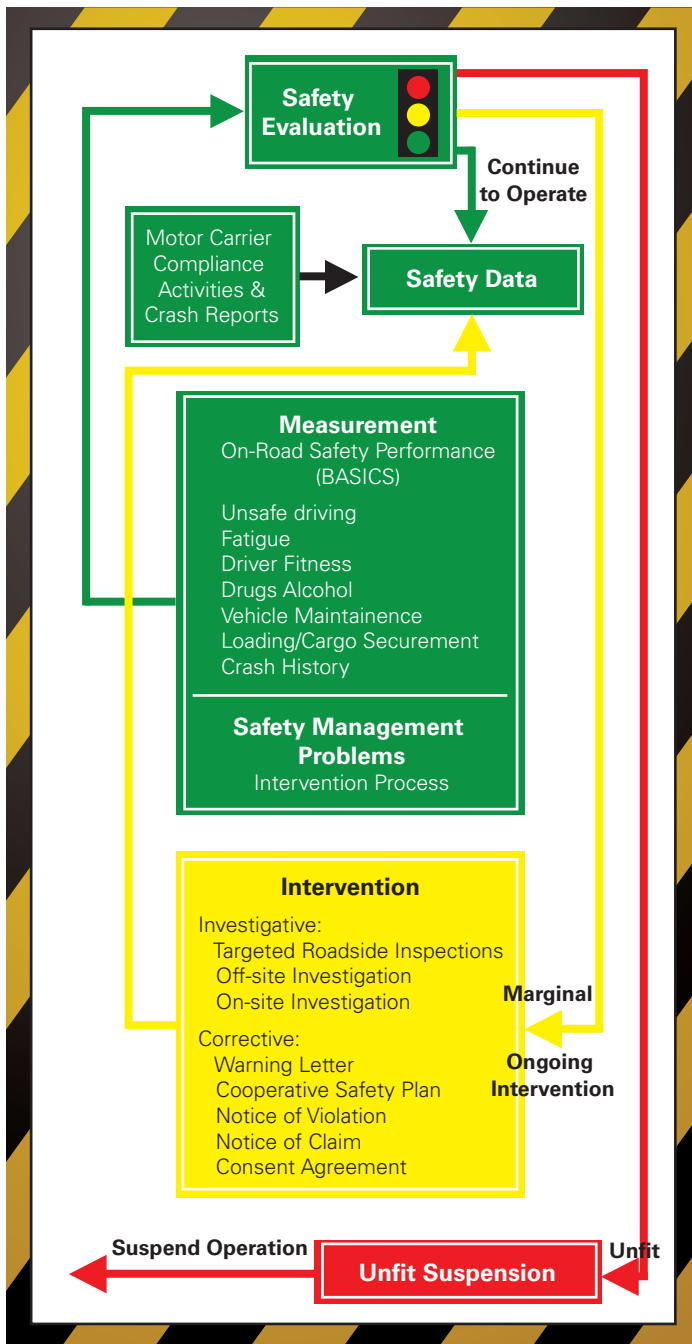
Why is CSA 2010 being implemented?

CSA 2010 seeks to better use FMCSA resources to identify drivers and motor carriers who pose safety problems and to intervene to address those problems as soon as they become apparent. FMCSA believes that CSA 2010 will help the Agency assess the safety performance of a greater segment of the industry and intervene with more carriers to change unsafe behavior early.

What is the Operational Model?

The operational model is the new way FMCSA and its state partners will carry out their compliance and enforcement programs. In contrast to the Agency's previous operational model, CSA 2010 is characterized

by 1) a more comprehensive measurement system; 2) a safety fitness determination methodology that is based on performance data and not necessarily tied to an on-site compliance review; and 3) a broader array of progressive interventions. The illustration below demonstrates how the major components of CSA 2010 will work together.



What are the BASICS and how are they used in CSA 2010?

The Behavioral Analysis and Safety Improvement Categories (BASICS) are seven categories of data available through the Motor Carrier Management Information System (MCMIS). They represent areas of behavior that can lead to crashes: unsafe driving, fatigued driving, diminished driver fitness, use of controlled substances and alcohol, inadequate vehicle maintenance, improper loading/cargo securement and crash history. These data are weighted differently based on crash causation but are all part of the CSA 2010 Operational Model’s Safety Measurement System (SMS) and are collected from on-road safety performance activities, including roadside inspections, traffic enforcement, the intervention process and crashes.

Will CSA 2010 take into account both carrier and driver safety performance?

Yes, both driver and carrier safety performance will be monitored. FMCSA has designed two Safety Measurement Systems—one for carriers, the Carrier Safety Measurement System (CSMS) and one for drivers, the Driver Safety Measurement System (DSMS).

What’s the difference between the new Safety Measurement System and SafeStat?

There are six important differences between the new Safety Measurement System (SMS) and the Agency’s current measurement system, SafeStat:

1. SMS is organized by seven specific behaviors (BASICS), while SafeStat is organized into four general Safety Evaluation Areas (SEAs)
2. SMS identifies safety problems in the same structure in which CSA 2010 addresses those problems, while SafeStat prioritizes carriers for a compliance review
3. SMS reviews all safety-based inspection violations, while SafeStat uses only out-of-service violations and selected moving violations
4. SMS uses risk-based violation weightings, while SafeStat does not
5. SMS impacts the safety fitness determination of an entity, while SafeStat has no impact on an entity’s safety fitness rating
6. SMS assesses individual drivers and carriers, while SafeStat assesses only carriers

What are the carrier interventions?

Carrier interventions (listed in increasing severity) are as follows:

1. Warning letter
2. Targeted roadside inspection
3. Off-site investigation
4. On-site investigation (focused)
5. Cooperative safety plan
6. Notice of violation
7. On-site investigation (comprehensive)
8. Notice of claim/settlement agreement
9. Suspension

When does a carrier intervention take place?

Carrier interventions are designed to be progressive, increasing in severity and interaction with motor carriers and their drivers. The goal is to use the interventions to reach a larger segment of the motor carrier industry. The intervention process is triggered by:

1. One or more deficient BASICs
2. A high crash indicator
3. A complaint or fatal crash. Intervention selection is influenced by:
 - a. safety performance
 - b. hazardous material or passenger carrier status
 - c. intervention history

What is the difference between a Compliance Review and CSA 2010 Interventions?

There are five important differences between CSA 2010 interventions and FMCSA's current compliance review (CR):

1. CRs are generally deployed at a carrier's place of business as a one-size-fits-all tool to address what may not be a comprehensive safety problem, while interventions under CSA 2010 may not be at a carrier's place of business and can be focused on a specific deficiency
2. The outcome of a CR can be the citing of acute and critical violations, while the outcome of an

intervention determines the root cause of the safety problem and provides guidance on corrective actions

3. A CR determines a carrier's safety rating, while CSA 2010 interventions will ultimately combine violations with on-road safety performance for safety fitness determination
4. The focus of a CR is compliance, while interventions are focused on compliance, improving behaviors that are linked to crashes and identifying causal factors
5. CRs are time consuming and reach fewer carriers, while interventions efficiently address safety problems and help reach more carriers earlier in the process

How is COMPASS related to CSA 2010?

In today's rapidly changing environment, new challenges have arisen for safety programs. The sheer volume of information and the rapid change within the industry have led to the need for a more efficient way to track safety activities. Information Technology (IT) is a major component of CSA 2010, and COMPASS is FMCSA's major IT modernization initiative. With respect to CSA 2010, COMPASS will track and update the safety performance data from regulated entities as they are received, link relevant data to the correct entity, validate the data and provide the mechanisms for correcting data. COMPASS will also support the intervention process as FMCSA and its state partners gather safety performance data on motor carriers and drivers.⁴

The CSA website warns carriers and drivers that failure to meet the new CSA 2010 standards could result in fines, corrective action plans or mandatory shutdown of operations. It's critically important that all carriers implement a measureable, results-oriented safety program as soon as possible, to be in compliance by the mid-2010 deadline.

Additional information on the CSA 2010 process can be found at the websites listed below. SilverStone Group's Transportation Risk Management team is also available to answer questions and offer direction regarding CSA 2010.

¹ Yen, Hope, "GAO: Unsafe truck, bus operators still on highways," The Associated Press website, accessed July 30, 2009 at www.google.com/hostednews/ap/article/ALeqM5g87CiWY4zRCVzhr_oYkSrTINnJqwD99ORDVGO

² "Overview of CSA 2010 Initiative, from the website of the Federal Motor Carrier Safety Administration, accessed July 30, 2009 at www.fmcsa.dot.gov/safety-security/csa2010/home.htm

³ Ibid.

⁴ "The CSA 2010 Dispatch—Frequently Asked Questions," accessed on August 5, 2009 at the U.S. Department of Transportation/Federal Motor Carrier Safety Administration website at www.csa2010.com/articles/FAQs_CSA_2010.htm

For further information, you may access the website of 2009 CSA2010.com and Vertical Alliance Group, Inc., at www.csa2010.com/