



**CSA (COMPLIANCE, SAFETY, ACCOUNTABILITY)  
DEFINED**



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FleetLynx is Vecima Networks' premier Telematics and Fleet Management Solution.

This white paper is focusing on best practices when looking at deploying a Telematics solution for a Transportation, Service or Government Fleet business. Data and research materials referenced refer to the 2012-2013 calendar year.

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## **1 Foreword**

Information is rapidly becoming a commodity. Knowledge is becoming the new competitive advantage. Consumers, wherever they live, will increasingly have information about, and access to the same products and brands. Messages involving your brand, especially involving accidents make it to millions of devices in an instant.

It is not just when accidents happen that your reputation comes under scrutiny. With the CSA Website implemented in 2010 drivers, carriers, shippers and the general public have instant access to safety and compliance records, before deciding with whom to do business.

Drivers can look up prospective employers' records and make a decision whether to come on-board as an employee. Vice-versa, Carriers can look up drivers' records and evaluate them based on fit and suitability. Shippers can look at a carrier's record to decide if this is the company to tow their trailers with their brand down the highway.

Vehicle maintenance, pre/post-trip inspection, and Hours of Service requirements feature prominently throughout many companies. Organizations of all sizes are looking at utilizing modern technology to help them stay on track and not get buried in paper and/or bad scores.

Vecima FleetLynx provides comprehensive, modular software and hardware solutions, from Driver Services on Smartphones and Tablets to on-board hardware and a Fleet Management system with real-time reporting and vehicle diagnostics.

Let us help you – contact [\*\*Sales@FleetLynx.net\*\*](mailto:Sales@FleetLynx.net)

## **2 Overview**

### **So, what is CSA?**

**CSA (Compliance, Safety, Accountability)** is a major safety measurement and reporting initiative of the Federal Motor Carrier Safety Administration (FMCSA). Designed to replace the SafeStat program, earlier CSA was known as "Comprehensive Safety Analysis," or more commonly "CSA 2010."

CSA includes no new laws; however, almost every aspect of the U.S. commercial motor freight industry is subject to new, expanded safety reporting and enforcement measures. New measures affect not only motor [carriers](#) (trucking companies), but also [drivers](#) who operate the equipment, [shippers](#) who hire carriers to move freight, and those who operate their own [private fleets](#).

In the past, carriers with a history of safety violations received "compliance reviews," but responses were not always prompt. **The result:** safety ratings were quickly outdated.

Under CSA, both drivers and carriers are responsible for adhering to measurable safety behaviors (BASICS). Driver violations are reported to carriers so they can address safety concerns, and carriers receive monthly safety scores. Both carriers and drivers are subject to penalties for failing to correct safety issues over time.

The transportation industry predicts that the monthly carrier evaluation will create a real-time, publicly available snapshot of the safety environment. CSA, along with other regulations affecting drivers, will

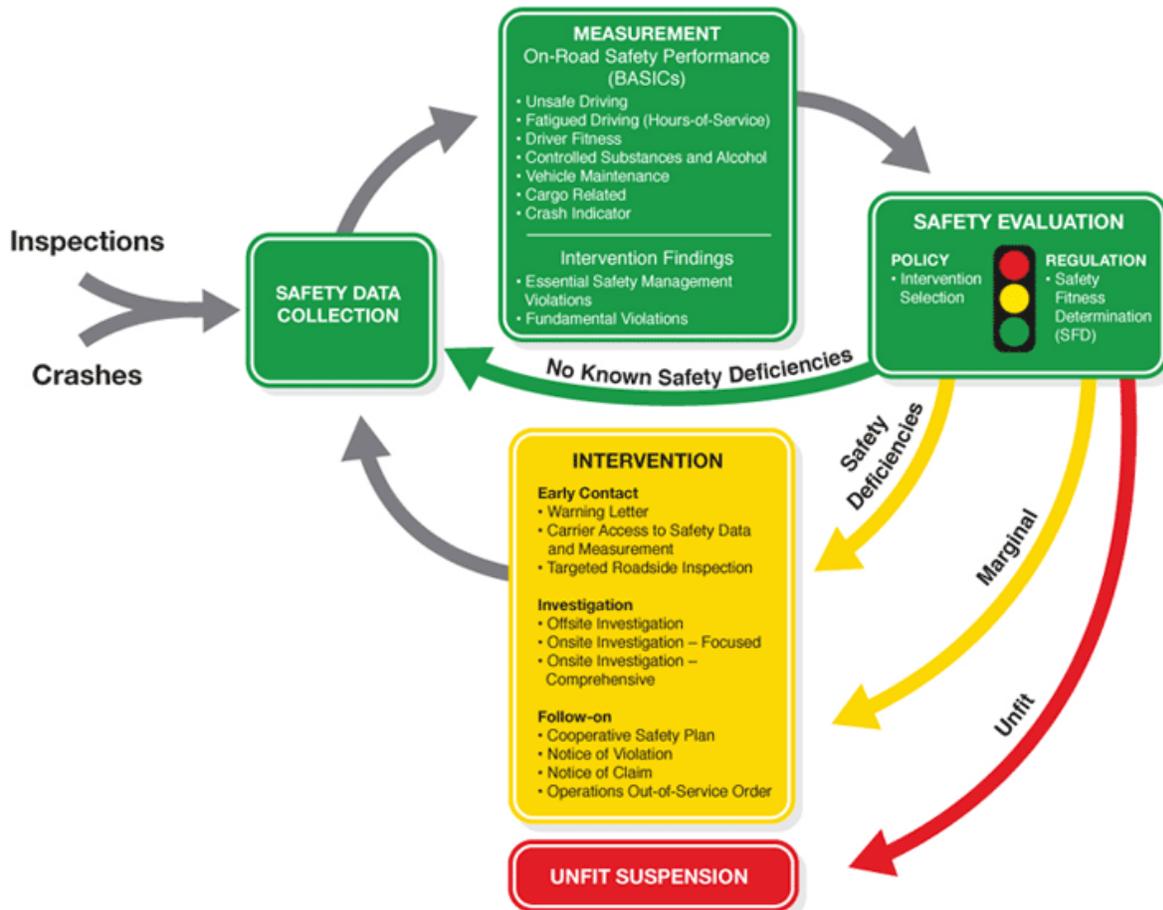
help to end the practice of drivers escaping consequences for poor safety performance by moving from carrier to carrier. The overall goal of collecting this safety performance and equipment maintenance data is to reduce accidents by pinpointing and addressing areas of concern. **The desired result:** safer highways for everyone.

### 3 New Compliance Enforcement model

CSA's new model affects every carrier with one or more vehicles over 10,000 lbs. that travels interstate and/or vehicles that carry hazardous materials inside the state. The model establishes a new, three-part focus for compliance and enforcement, which includes:

- **Measurement:** CSA uses inspections and crash results to measure safety performance. The goal is to identify and address behaviors that could result in crashes.
- **Evaluation:** CSA helps to address these behaviors using the Safety Measurement System (SMS), which helps pinpoint safety performance issues and to monitor compliance issues over time.
- **Intervention:** CSA specifies how data is collected, analyzed and shared. It also specifies how officials can best intervene to improve safety.

Below is a chart showing in detail the interaction between all areas:



#### 4 CSA Scores – BASICS:

CSA scores not only affect organizations, they also affect the driver. Truck drivers can check a carrier's CSA score prior to accepting a position to ensure they will be working with a carrier that promotes a safe workplace. Trucking companies with BASIC scores above the threshold are subject to more roadside inspections.

**BASICS** (Behavioral Analysis and Safety Improvement Categories) are the categories the Federal Motor Carrier Safety Administration (**FMCSA**) uses as part of the Safety Measurement System (**SMS**) to measure safety performance and create monthly CSA scores.

There are seven categories of potential violations. Currently, only five of the seven categories are viewable to the public. The FMCSA has delayed posting the scores for the Cargo-Related BASIC while they reconsider how the score is calculated. Also, carriers can see their own individual Crash Indicator score, but there is no plan to make this BASIC available to the public.

The seven BASICS with their corresponding references to parts of Federal Regulations, definitions, and example violations are:

BASIC	Part	This category refers to:	Example Violations
Unsafe Driving	<a href="#">392</a> <a href="#">397</a>	Driving carelessly or dangerously.	Reckless driving, speeding, improper lane change
Hours of Service (HOS)	<a href="#">392</a> <a href="#">395</a>	Driving while sick, fatigued, or failing to comply with HOS (Hours-of-Service).	Incomplete or inaccurate logbook, driving while ill, driving while fatigued, exceeding HOS
Driver Fitness	<a href="#">383</a> <a href="#">391</a>	Driving while unqualified due to medical issues, lack of training or inexperience.	Medically unqualified to operate a commercial motor vehicle (CMV), lack of a valid commercial driver's license (CDL)
Controlled Substance / Alcohol	<a href="#">392</a>	Driving while impaired by alcohol, by illegal drugs, or by misuse of prescription or over-the-counter drugs.	Driving under the influence of alcohol or drugs, possession of illegal drugs
Vehicle Maintenance	<a href="#">393</a> <a href="#">396</a>	Failure to properly maintain a commercial motor vehicle (CMV).	Mechanical defects, brakes, lights, failure to repair mechanical defects
Hazardous Materials	<a href="#">392</a> <a href="#">393</a> <a href="#">397</a> <a href="#">Hazmat</a>	Safety problems related to the handling of cargo or to improper handling of hazardous materials.	Improperly secured load, dropped or spilled cargo, improper hazardous material handling
Crash Indicator	Crash History	Information from state sources about crash histories.	Crashes, accidents

### 4.1 Your CSA Score – what does it mean?

The CSA scores for privates fleet, for carriers, and for owner-operators are updated monthly. The [FMCSA](#) calculates scores based on results of inspections, violations and crash data from drivers, as well as how recently the issues took place. FMCSA calculates scores for each of the seven [BASICS](#): [Unsafe Driving](#), [Hours of Service \(HOS\)](#), [Driver Fitness](#), [Controlled Substances/Alcohol](#), [Vehicle Maintenance](#), [Hazardous Materials](#) and [Crash Indicator](#).

Scores are then compared with other, similar carriers and ranked according to percentiles from 0 to 100, with lower numbers indicating a better safety record, and records worsening the closer they approach 100. A score of 30 on a single [BASIC](#) indicates that your fleet is performing in the top 30% of carriers in that category.

### 4.2 What triggers interventions: 7 Basics with Thresholds

Carriers often want to know what triggers an intervention. The [FMCSA](#) points to several factors that they consider when deciding whether or not to intervene - serious violations, violations involving passengers or hazardous freight, historical interventions, or the timing since the last one.

Also, the [FMCSA](#) looks at the number of [BASICS](#) percentiles above the "threshold". (Higher rating numbers mean poorer compliance. See "Measurement" to better understand percentiles.) The thresholds for specific [BASICS](#) can change anytime. As of April, 2011, current thresholds are:

Intervention Thresholds			
BASICS	General	Hazardous Materials Carrier	Passenger Carrier
Unsafe Driving, Fatigued Driving (HOS), Crash Indicator	65	60	50
Driver Fitness, Controlled Substances/Alcohol, Vehicle Maintenance, Cargo-Related	80	75	65

### 4.3 Understand Interventions and How They Work

It's important to understand how interventions work. Interventions help to identify safety problems early so a carrier can take quick, decisive steps to fix them.

Types of interventions range from [warning letters](#), to [onsite comprehensive investigations](#), to in the

worst-case scenario - [Operations Out-of-Service Orders \(OOS\)](#). The desired result is always the same: **to improve highway safety.**

It's also important to understand how and when to respond to interventions. For some interventions, such as warning letters, it may be as simple as reviewing the information, taking action to correct the problem, and contacting the FMCSA with questions. In other cases, such as a [Notice of Violation \(NOV\)](#), the carrier is required to respond. [Read the full description of the types of interventions](#) as well as more information about [investigations](#) in [Resources](#).

## **5 Tips (by BASIC) for Drivers, Carriers and Private Fleets**

Here are some tips, organized by BASIC, for avoiding violations:

### Unsafe Driving:

- Follow traffic, construction zone, and speed limit signs
- Wear your seatbelt
- When inspected, get a copy and ensure everything is correct
- If inspection mentions speeding, make sure mph over limit is noted

### Fatigued Driving:

- Take advantage of 10 hour breaks and rest
- Don't drive when ill or not properly rested
- Keep logs up to date and complete (date, lines and signature)
- Keep previous 7 days of logs with you. At beginning of new month, keep previous month's log also.

### Driver Fitness:

- Take care of personal business that might affect your CDL
- Personal paperwork: Ensure CDL and Medical Certificate are up to date and easily available
- Equipment paperwork: Be sure registration, insurance and bills of lading are easily available
- Make sure endorsements (Hazmat) are correct for the load you're hauling
- Use corrective lenses and/or hearing aids when Medical Certificate requires them

### Controlled Substances and Alcohol:

- Don't drink and drive, ever
- Know medications and the possible side effects (drowsiness), including prescriptions and over-the-counter medications
- Only take medication prescribed to you
- When ill or sick, see a doctor

### Vehicle Maintenance:

- Do a quality pre-trip inspection every work day, including lights, tires and brakes
- Using a quality tire and tread depth gauge, make sure all tires meet PSI and tread depth guidelines
- Fix obvious problems
- Document post-trip inspections in Driver Vehicle Inspection Report (DVIR)

### Cargo Related:

- Do proper blocking and bracing before leaving customer
- Continue to verify securement during trip

- Know the weight of load and load limits on roads traveling
- Use bungee cords for tarp control only

## **6 Six Levels of a Roadside Inspection:**

Drivers of a CMV may encounter several different levels of roadside inspection. The most common and most comprehensive inspection is the Level I inspection, which is a detailed inspection of both vehicle and driver. The other levels of inspection are components of the Level I inspection or have a very specific focus or purpose. The six levels of inspection are:

### **LEVEL I**

#### **North American Standard Inspection**

An inspection that includes examination of driver's license, medical examiner's certificate and waiver, if applicable, alcohol and drugs, driver's record of duty status as required, hours of service, seat belt, vehicle inspection report, brake system, coupling devices, exhaust system, frame, fuel system, turn signals, brake lamps, tail lamps, head lamps, lamps on projecting loads, safe loading, steering mechanism, suspension, tires, van and open-top trailer bodies, wheels and rims, windshield wipers, emergency exits on buses and HM requirements, as applicable.

### **LEVEL II**

#### **Walk-Around Driver/Vehicle Inspection**

An examination that includes each of the items specified under the North American Standard Inspection. As a minimum, Level II inspections must include examination of: driver's license, medical examinees certificate and waiver, if applicable, alcohol and drugs, driver's record of duty status as required, hours of service, seat belt, vehicle inspection report, brake system, coupling devices, exhaust system, frame, fuel system, turn signals, brake lamps, tail lamps, head lamps, lamps on projecting loads, safe loading, steering mechanism, suspension, tires, van and open-top trailer bodies, wheels and rims, windshield wipers, emergency exits on buses, and HM requirements, as applicable. It is contemplated that the walk-around driver/vehicle inspection will include only those items which can be inspected without physically getting under the vehicle.

### **LEVEL III**

#### **Driver-Only Inspection**

A roadside examination of the driver's license, medical certification and waiver, if applicable, driver's record of duty status as required, hours of service, seat belt, vehicle inspection report, and HM requirements, as applicable.

### **LEVEL IV**

#### **Special Inspections**

Inspections under this heading typically include a one-time examination of a particular item. These examinations are normally made in support of a study or to verify or refute a suspected trend.

### **LEVEL V**

#### **Vehicle-Only Inspection**

An inspection that includes each of the vehicle inspection items specified under the North American Standard Inspection (Level I), without a driver present, conducted at any location.

### **LEVEL VI**

#### **Enhanced NAS Inspection for Radioactive Shipments**

An inspection for select radiological shipments, which include inspection procedures, enhancements to the Level I inspection, radiological requirements, and the enhanced out-of-service criteria. Select radiological shipments include only highway route controlled quantities as defined by title 49 section 173.403 and all transuranic.

## **7 CSA Impact on you as Carrier**

For carriers that have demonstrated their commitment to safe operation, ongoing fleet maintenance, and driver training/evaluation, changes brought on by CSA will be minimal. For others, the burden to catch up and keep up may prove much more difficult.

Carrier safety scores are now available to the public. This means that these scores are available to shippers looking to hire a safe and reliable carrier, and they're available to drivers looking to compare potential employers.

### **7.1 Responsibilities for and to drivers**

As in the past, the [FMCSA](#) will continue to hold carriers responsible for their drivers' performance. As such, carriers have a responsibility to hire safe drivers.

Now, carriers have the opportunity and the available tools to review prospective drivers' safety records through the [PSP](#) process. This pre-employment screening resource allows carriers to review a driver's safety and inspection record and to understand how the driver's future performance could impact the carrier's overall standing. Similarly, drivers have the opportunity to look at a carrier's CSA scores to evaluate a potential employer's commitment to safety. This process of mutual selectiveness for both driver and employer means that the best driving jobs will be available to the drivers who are best suited for them.

Continuing to develop drivers with excellent safety skills will remain important. Carrier-sponsored driver training programs will be useful, because the driver evaluation process - including the BASICs prescribed by CSA - places a premium on highly qualified drivers who have training in safety and other procedures.

### **7.2 Opportunities for Carriers under CSA**

The biggest opportunity CSA presents to carriers is that trucking firms with proven safety practices will be in higher demand. The best carriers are likely to focus on:

- Developing and maintaining a well-trained driver force
- Performing proper maintenance
- Keeping accurate records
- Complying with the specifics of CSA regulations
- Embracing the spirit of CSA's intent to improve highway safety

A continual focus on these few key areas can help carriers reap regular benefits of safe operations. Every carrier would obviously enjoy less frequent equipment breakdowns, fewer accidents, more satisfied employees, and better profits. The bonus with CSA is that now these practices can do an even better job of helping safe carriers promote themselves in marketplace.

### 7.3 As a Carrier #1 item - you should know your score:

Carrier and driver performance requirements have not changed under CSA. Carriers and drivers are still required to comply with regulations, just as they were before. One difference: **all** violations are recorded, even warnings.

As a carrier, your CSA scores indicate how well your safety performance stands up next to your peers. That is important, because shippers who value the safe shipment of their freight are more likely to choose carriers with good ratings.

Check your carrier performance regularly to know your record score compared to your competitors. Identify any areas of concern that need attention, and create a plan to resolve problems. Take a close look. Is everything correct? If not, challenge the information through the DataQS system (<https://datags.fmcsa.dot.gov/>)

### 7.4 As a Carrier #2 item – 7 CSA facts you should know:

There are lots of myths surrounding CSA, and it can be difficult to navigate all the information. Here are 7 specifics that all carriers should know:

1. An employer does not inherit any of a newly hired driver's past violations. A carrier / private fleet is responsible only for inspections and accidents that occur while a driver is employed with that carrier. Earlier violations, accidents and inspections do not affect their safety rating, with one caveat. If the new employer is investigated and a driver's previous record includes any of the so-called "[Red Flag Violations](#)", the FMCSA will always investigate to ensure these violations have been corrected.
2. A driver's violations can't be erased from the employer's record by terminating the driver. Any points acquired for violations by a driver remain as part of the employer's [SMS](#) data for two years, no matter what happens with the status of the driver's employment.
3. Tickets or violations acquired in personal vehicles do not count for [SMS](#) data. Therefore, they do not affect the employer's safety rating.
4. CSA does not authorize the [FMCSA](#) to remove any drivers from their jobs. Only the state authorities that issue the licenses have the authority to revoke them.
5. The driver enforcement process can result in direct action against a driver and/or the employer in some cases as part of CSA. If drivers have poor safety histories over a 3-year period and the current employer is investigated, the [FMCSA](#) can issue enforcement actions, such as an [NOV \(Notice of Violation\)](#) or [NOC \(Notice of Claim\)](#). Also, [FMCSA](#) can take action against drivers for serious rule violations such as driving while disqualified, driving without a CDL, making a false entry on a medical certificate, etc. If the employer is found to be at fault for any of these, they can receive enforcement actions also.
6. Employers can review driver profiles as a pre-employment tool through [Pre-Employment Screening Program \(PSP\)](#) if the driver has authorized access to their record (not for existing drivers, though). Note that CSA doesn't offer safety "ratings" for individual drivers. Also, the FMCSA has cautioned that while some third-party vendors are developing and marketing CSA scorecards, they do not and will not provide driver's historical safety information and will not validate any such data or scorecards for vendors.

7. CSA will replace the old [SafeStat](#) system, which focused primarily on rating only carriers. CSA focuses efforts on both carriers and drivers.

## **8 Impact on you as driver\***

Even though there are no new rules for drivers under CSA, there is new accountability. Does the government publish a rating of your personal safety performance? No. However, you could receive fines or corrections if your employer is investigated. Poor performance on the road could seriously impact your career.

However, more responsibility also means more opportunity. As a driver with a proven safety record, you are now more valuable to your employer than ever. And that, along with improved safety on our highways, is perhaps the most exciting part of CSA.

Under CSA, your safe driving record is your most valuable professional asset. Treat it accordingly and protect it by knowing what is on your [PSP \(Pre-Employment Screening Program\)](#) record and what it means.

[PSP](#) is not technically part of CSA, but because both were implemented at the same time, they are often tied together.

### **8.1 What is PSP?**

PSP is a new FMCSA program mandated by Congress. Its goal is to help prospective employers view drivers' crash and serious safety violation history before they are hired. Remember that PSP is a voluntary program. You do not have to participate, and PSP is not technically part of CSA, but because both were implemented at the same time, they are often inclusive.

With CSA and PSP, drivers are more responsible for their professional driving record because all violations follow the driver from job to job.

### **8.2 What is in my report?**

It is important to know what is on your PSP record. It includes 5 years of crash history and 3 years of inspections. Co-driver safety, post-crash violations, as well as the date your safety records were updated will also be included.

Think of PSP as your "credit score" as a professional driver. Little things can add up, so it is important to check out your report from time to time to ensure accuracy.

You should also check the SMS ratings of any company you apply to for a driving job. Since a portion of a driver's score comes from the rating for equipment maintenance, driving for a carrier with a proven commitment to well-maintained vehicles can actually improve your PSP standing.

Also, review your MVR (Motor Vehicle Record) on a regular basis along with your PSP record and the SMS ratings for your company or potential employer. Make sure everything is correct. If there are inaccuracies, take care of them immediately.

\*Note if you are a driver with your own DOT number, operating authority and insurance (example Owner Operator or independent Contractor), while you are responsible as a driver, you are also evaluated as a carrier!!

### **8.3 How do I get a report?**

To request a copy of your personal driving history from the FMCSA for \$10, go to <http://www.psp.fmcsa.dot.gov> or call **1-877-684-6832**. The report is for you and will never be sent to your current employer or potential employer except upon request.

For information on the Pre-Employment Screening Program using the federal Freedom of Information Act (free), visit [www.fmcsa.dot.gov/foia/index.htm](http://www.fmcsa.dot.gov/foia/index.htm).

### **8.4 How do I know how a prospective employer uses my report?**

Even though PSP is a voluntary program, it is a valuable program to employers seeking safe drivers. Frankly, it is most likely the first thing an employer will look to and consider when hiring drivers. (It is worth noting that a driver's history before being hired by a carrier will not affect the carrier's overall safety rating.)

By federal law, carriers can only view a driver's report as a pre-employment tool and cannot use it otherwise without the driver's written permission.

### **8.5 How do I read a PSP report?**

**The first section of the PSP Report** shows the four types of data needed to access the report: driver's first name, last name, driver's license number and state. If there are no results, the report appears with a red stamp in the upper right corner that reads: "No crash or inspection results found."

**The second section, the crash summary**, details information about any crashes in the past five years. The bottom of this section includes the date and time the PSP request was made and a "snapshot date" that shows how recently the data was updated.

**The next section, inspection information**, shows three years of information about inspections, including designations if the inspections were Hazmat-related. It also indicates any co-driver violations or violations that result from post-crash inspections.

**Next, the violation summary** displays only violation information for the specific driver requested. Violations that might result from a post-crash inspection do not appear in the violation summary section. Finally, a footnote explains how the violations are summarized.

### **How do I fix my report if it's wrong?**

If you find an error on your report, an [RDR \(Request for Data Review\)](#) can help you get it corrected. The [FMCSA's](#) DataQs process allows you to review and challenge any incorrect information in [FMCSA's](#) records.

Go to <https://dataqs.fmcsa.dot.gov/> and register as a user to request a data review.

## **9 Impact on private Fleets**

For the owner of a private fleet, CSA means new responsibilities and new concerns for your fleet. Any private fleet or carrier, large or small, - that operates vehicles over 10,000 pounds and runs interstate routes (or hazardous materials intrastate) is subject to CSA scrutiny.

Many of the items from the carrier section in this document apply – please have a look at the 7 CSA facts you should know section under carrier. Furthermore look at the Tips by BASIC – list which applies to drivers, carriers and private Fleets – also earlier in this document.

In addition to those – probably the biggest impact is on hiring, especially if you have part-time drivers who are also driving for another carrier(s) or are Owner Operators when not driving your fleet vehicles.

### **9.1 Hiring Concerns:**

Changes under CSA means private fleets and [carriers](#) alike will have concerns when hiring new drivers. Greater accountability means that drivers are not just responsible for their own performance, because now drivers' individual records affect their employers' CSA score. New reporting measures mean that if your driver has violations or a crash while in your employ, your fleet's CSA score will reflect it.

Will a driver's history of violations or crashes affect your CSA score? Not immediately, because private fleets and carriers do not inherit any of a driver's past violations as part of their CSA score. However, it is important to know that if you are otherwise investigated as part of a CSA intervention, the driver's history makes a difference.

If the driver has committed any of the "[Red Flag](#)" violations in the past, the FMCSA will always investigate later to ensure the issues have been corrected. If not corrected, drivers can receive further interventions, and their employers can be penalized as well if at fault. Also, remember that a driver's history of violations and/or crashes while under your employ affects your private fleet's CSA score for two years afterward, even if the driver leaves or is terminated.

So, how can you protect your private fleet with good hiring practices?

**Check drivers' violation/crash histories.** [PSP reports](#) show driver histories of inspections, violations, crashes and even warnings. While the program is voluntary for drivers (they must give permission for potential employers to view their report), many employers require it before hiring. Even though a driver's history does not immediately affect your CSA score, it can help you decide whether the driver's record indicates a safety issue that is likely to happen again, and how it would affect your CSA score if it did.

Also, a driver's PSP report will show any violations or accidents that occurred in the past month, giving you as a prospective employer the latest information on your driver candidate. This can help you avoid unknowingly hiring a driver trying to "escape" accountability for a recent bad situation that may not yet show up in other records.

**Review your CSA score regularly.** Knowing your CSA score can help you identify areas of concern within your fleet. It can also help you understand how to pinpoint areas of concern in a driver's history. Doing so might help you recognize how those concerns could affect your future CSA scores if a certain driver is hired.

Understand [interventions](#) and [investigations](#) under CSA. Learn how the [FMCSA](#) conducts interventions and investigates safety problems. Understanding these processes can help you make informed decisions when hiring new drivers.

**Commit to safety.** Practice regular equipment maintenance, accurate recordkeeping, and appropriate safety training for employees. Each of these practices can not only help to ensure your own safety practices, but can also help retain the best drivers who want to work for a company with a commitment to safety.

**Think about potential liability.** Nothing says that hiring a driver with a history of certain violations will absolutely increase your potential liability as an employer in the event of an accident. However, this may be hard to predict. At the least, thorough assessments of drivers you wish to hire can help mitigate any potential liability.

## 9.2 Outsourcing

Almost every shipper, carrier, and private fleet is affected by CSA. Those over 10,000 lbs who carry freight interstate - or those who carry hazardous material within the state - are subject to CSA's standards regardless of the size of their fleet.

For this reason, some private fleets may choose to focus their efforts on their company's core competency, the business of moving freight. In these cases, private fleet owners may choose to outsource elements of their business - particularly safety and compliance - to third parties to help ensure that the company can appropriately respond to CSA requirements.

What sorts of things related to CSA can be outsourced?

**Management of [Controlled Substances and Alcohol](#).** Controlled substances/alcohol is one of the seven [BASICS](#). Regulations require private fleets and carriers to have an appropriate drug- and alcohol-testing program, including random-pull testing. Keeping track of requirements, compliance, and managing the random pulls can be difficult. Some companies will choose third-party providers to manage this process. Outsourced providers can do random pulls, notify drivers, set up tests, as well as compile, track, and communicate test results, even for those cases when post-accident testing was required after a crash.

**Driver File Management.** The [BASIC](#) for [Driver Fitness](#) includes requirements that drivers are qualified to drive in terms of skills, experience, possession of a CDL, and violations in this category can include lack of training, experience, or the appropriate medical authorizations. A third-party provider can audit and maintain driver files, tracking the necessary requirements and compliance.

**Vehicle Maintenance.** Violations of this [BASIC](#) refer to a lack of maintenance for a Commercial Motor Vehicle (CMV). Third-party providers can do anything from providing the vehicle's preventative maintenance in its entirety to specific maintenance issues such as inspection reports, permits, titles, fuel tax reports, etc.

**Log Auditing.** Violations in the [BASIC](#) category for [Hours of Service \(HOS\)](#) include driving while fatigued, exceeding Hours of Service (HOS), as well as incomplete or inaccurate logbooks. Additionally, falsified logbooks can trigger FMCSA interventions. Outsourced providers can audit driver logs and report findings to you, allowing you to step in and train drivers and other employees before the [FMCSA](#) intervenes.

**Outsourcing to a Dedicated Contract Carriage Provider (DCC).** Some private fleets find it better for them to completely outsource to a dedicated contract carriage provider. A strong provider can help your fleet adapt to the changing business climate and can help insulate you from the liabilities and risk that accompany private fleet ownership.

## **10 Impact on you as Shipper**

At first glance, you may not think new regulations involving interstate trucking would affect companies that hire others to carry their freight. That is not the case with CSA.

As a shipper, do you get safety ratings as part of CSA just like carriers? No. But you still play a key role in the safe transport of your freight on the nation's roadways. Does CSA affect you as a shipper? Yes. And CSA's impact on your business can take several forms.

### **10.1 Fewer unsafe Operators:**

CSA means more responsibility for safety. Carriers and shippers who operate illegally in favor speed or cost savings will no longer be able to do so under CSA. The reason: even though there are no changes to laws, CSA's measurement and enforcement means greater accountability for carriers.

Now, carriers are accountable for every recorded citation, violation or warning. Repeated or flagrant violations could result in lost business, higher insurance exposure, and possible law enforcement intervention, which will likely end long-term partnerships between unsafe carriers and shippers.

For example, in the past, some shippers who loaded their own product may have been careless with accuracy or safety standards, sometimes with the carrier's knowing participation. Costs of non-compliance (tickets, failed inspections, or other violations) were occasionally absorbed by the carrier, or even by the shipper paying the carrier for them. In these cases, costs were viewed simply as the price of doing business. With CSA, more accountability means carriers will be less willing to accept the consequences for these arrangements. In turn, this means fewer unsafe carriers in operation.

### **10.2 Increased Liability**

Shippers may risk an increased level of potential liability under CSA. If a case can be made that their business practices contributed to creating an unsafe environment, the shipper could share exposure in the event of an accident.

Among the unsafe practices or problems that might increase your litigation risk:

- Improperly secured cargo
- Inaccurate shipping weight on paperwork
- Long detention periods
- Improper Hazmat procedures
- Inadequate loading or transit times
- Other unsafe policies or practices

Negligence in the carrier selection process could also expose shippers to potential liability. With safety ratings updated monthly, there is no reason to select a carrier with a substandard safety status. When

searching for the best carrier, proceed with caution, choose carefully, and look closely at your process for carrier selection.

### **10.3 Carrier Management**

Shippers now have access to current carrier safety ratings through CSA's SMS (Safety Measurement System), where you can access records for current or potential shipping partners. Performance records update monthly, with percentile ratings for each of the BASICs ranging from 0 at best to 100 at the very worst.

Some shippers may find that the process of checking multiple carriers each month is too cumbersome to manage and will reduce the number of carriers they engage. If so, many third-party providers and consultants specializing in CSA reporting and carrier evaluations can help with the management process.

### **10.4 Check carrier ratings**

#### Tips for Shippers

- Be selective in choosing carriers. Use the new CSA ratings to choose partners that have proven records as safe performers.
- Check the CSA carrier ratings frequently, as these ratings update monthly.
- Realize that carriers that are committed to safe operations with full CSA compliance will be the carriers you will be able to depend upon in the future.
- Recognize that shipping rates may rise as some carriers work to comply with the rigors of CSA reporting and maintenance requirements. They may feel the need to pass those costs along to shippers, especially if they were not previously committed to a similar standard.
- Understand that as a shipper, you play an important role in the safe transport of loads, and your responsibility extends far beyond your own loading docks.
- Shipper compliance requires accuracy in all Bills of Lading for shipments from their points of origin.
- Try to reduce or eliminate time that drivers are engaged in any non-driving activities at docks.
- Maintain load integrity and security. As the shipper, no one knows the shipment and how it should be safely loaded and secured for transport better than you. Brief drivers on the load and provide any special instructions at the time of pickup.

**11 Practice Examples**

How to confirm scores relative to your Driving Company

**Step 1** – to begin got to <http://ai.fmcsa.dot.gov/sms/>



**Step 2** – Above used DOT number for example only – this should therefore go to the company’s “home page” within the system – see below – click on the blue View button:



**Step 3** – The view now shows all the BASICs scores:



**Step 4** - The unsafe driving category can weigh heavy against your overall CSA scores – click on “Unsafe Driving” to get a detailed explanation of on-road performance. A view with this gage will appear showing how the company is ranked within the Unsafe Driving BASIC. In this case at 28.7% the company is doing well within the peer-group – essentially within the top 1/3 of fleet’s with a similar size (see grouping and Segment).

**On-road Performance Overview**



The Unsafe Driving measure/percentile is based on Roadside Inspection reports. Some Unsafe Driving violations are reported when a Roadside Inspection was performed following a traffic stop for the Unsafe Driving violation. These reported violations do not always result in the issuance of a citation to the driver.

Step 5 - Scores shows clearly that the company does not exceed the intervention threshold:

**Unsafe Driving**  
Operation of CMVs by drivers in a dangerous or careless manner. (FMCSR Parts 392 and 397)

**BASIC Overall Status**  
Does not exceed intervention threshold based upon On-road Performance and Investigation Results.  
(Based on a 24-month record ending June 22, 2012)

**No need for intervention!**

Check out the other BASICs the same way – enter the DOT number for the company and click on the items listed in the BASICs overview to get the details on each line:

Select a BASIC below to view details

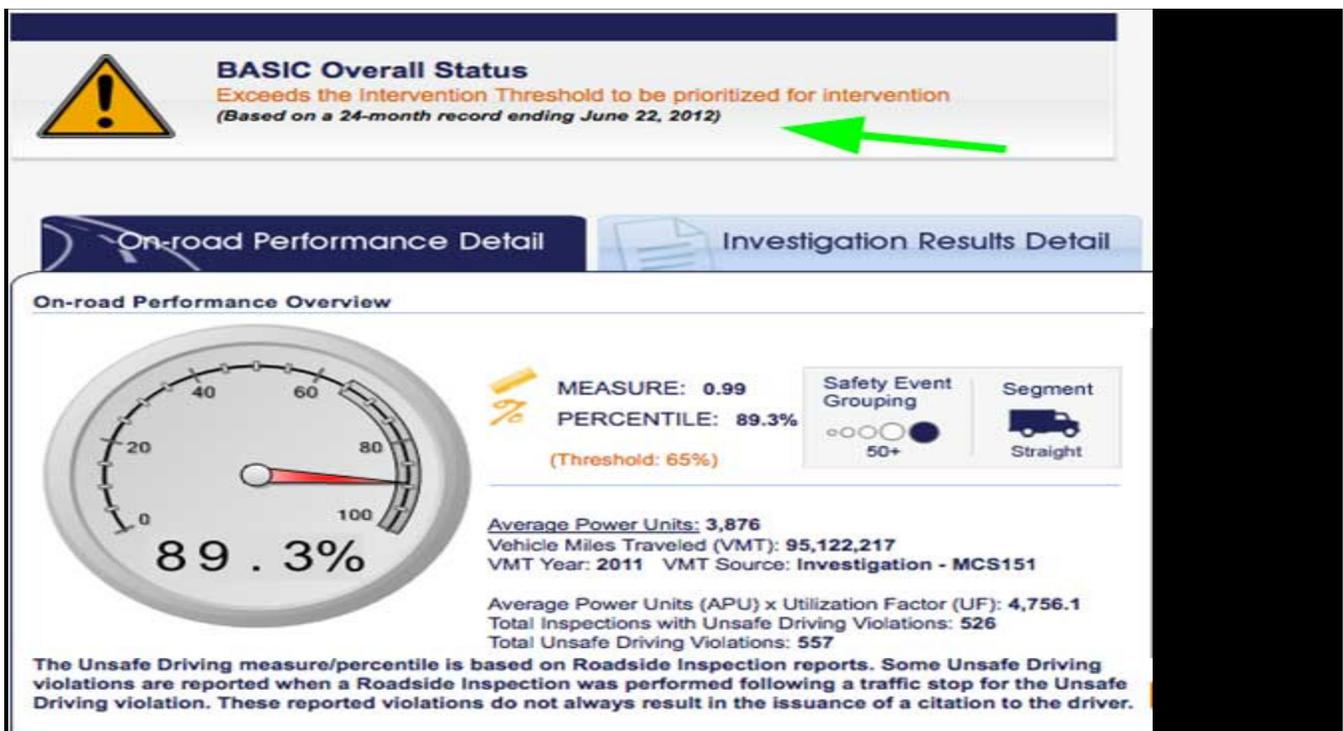
BASICs Overview (Based on a 24-month record ending June 22, 2012)	PERFORMANCE		BASICs Status
	On-Road	Investigation	
<b>Unsafe Driving</b>	1.9%		
<b>Fatigued Driving (Hours-of-Service)</b>	35.4%		
<b>Driver Fitness</b>	Inconclusive		
<b>Controlled Substances and Alcohol</b>	No Violations		
<b>Vehicle Maintenance</b>	45.4%		
<b>Cargo-Related</b>	Not Public	Not Public	Not Public
<b>Crash Indicator</b>	Not Public	Not Applicable	Not Public

\*USE OF SMS DATA/INFORMATION

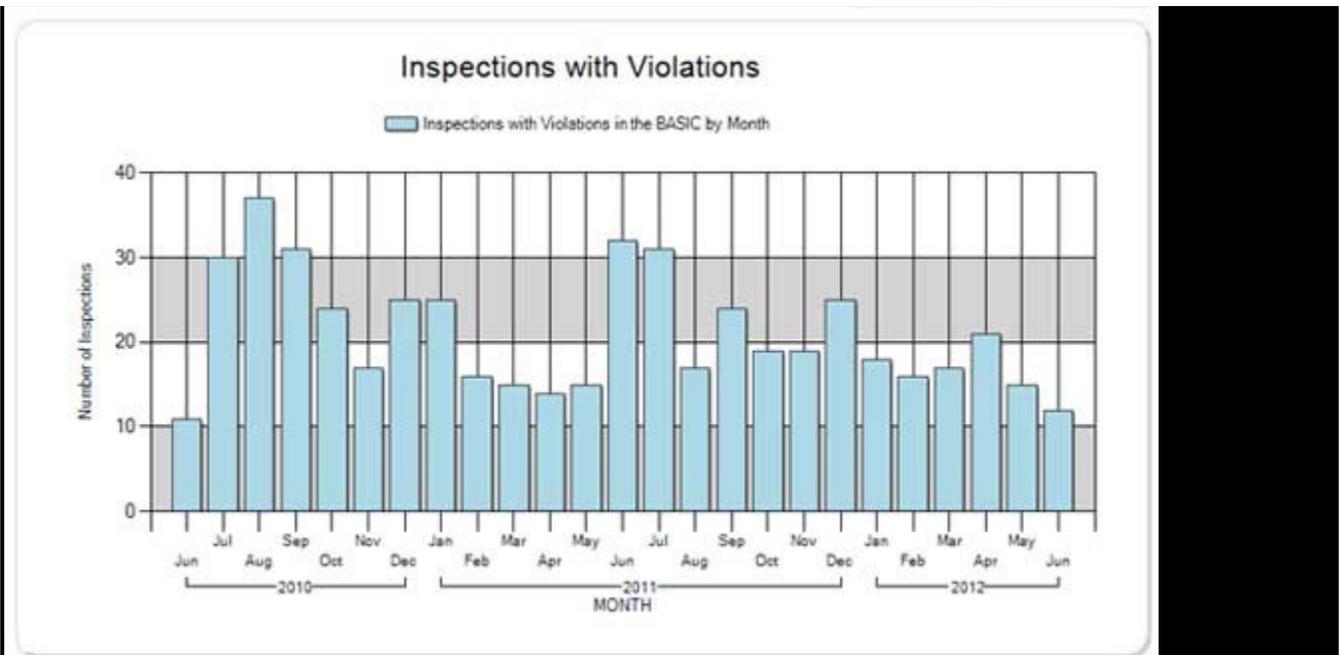
Another company's record is fairing less favorably and in fact shows that intervention triggers were exceeded in not only one but two categories:



By clicking on “Unsafe Driving” in this instance – one gets the detailed screen with the gage as earlier:



By using the 3 tab to the right called "Performance tools, one can get the entire inspection history that led to this scoring historically (all the way to the present).



While at first glance, the BASICS site may seem daunting; when you simply investigate the site (by clicking various hyperlinks), you will be amazed at the wealth of information that is at your fingertips! Each BASIC is hyperlinked to its own specific grade, intervention status, individualized reports, status graphs and charts, etc.

So, whether you are an individual looking into entering the truck driving profession, or you are a current road veteran, the CSA scores site is a worthy use of your time. You can gather information on a trucking company you may be interested in driving for; or you can investigate how your current carrier is performing. Either way, in any field, knowledge is power the more you have . . . the wiser decisions you allow yourself to make in the future.

## **12 Glossary of commonly used terms and abbreviations**

### **BASICs (Behavioral Analysis and Safety Improvement Categories):**

These are the set of criteria under CSA used to create the safety scores for carriers and drivers. There are seven categories of potential violations: [Unsafe Driving](#), [Hours of Service \(HOS\)](#), [Driver Fitness](#), [Controlled Substances/Alcohol](#), [Vehicle Maintenance](#), [Hazardous Materials](#) and [Crash Indicator](#).

### **Hazardous Materials:**

One of the seven [BASICs](#). Violations in this category include safety problems related to the unsafe handling of Hazardous Materials (HM) on a CMV. Example violations: leaking containers, improper placarding, improperly packaged HM.

### **Controlled Substances/Alcohol:**

One of the seven [BASICs](#). Violations in this category refer to a driver operating a commercial motor vehicle (CMV) while being impaired by alcohol, by illegal drugs, or by misuse of prescription or over-the-counter drugs. Example violations: driving under the influence of alcohol or drugs, possession of illegal drugs.

### **Crash Indicator:**

One of the seven [BASICs](#). Violations in this category are based on information from state sources. They indicate a history or pattern of crash involvement that is frequent and/or severe.

### **CSA (Compliance, Safety, Accountability):**

This refers to the set of regulations by the [FMCSA \(Federal Motor Carrier Safety Administration\)](#) for measuring, reporting and enforcing carrier safety. CSA was previously known as "Comprehensive Safety Analysis" or "CSA 2010".

### **CSP (Cooperative Safety Plan):**

This voluntary plan is a type of [follow-on intervention](#) that a carrier may initiate. In these cases, the carrier partners with the FMCSA to develop a safety improvement plan.

### **DOT (U.S. Department of Transportation):**

The U.S. federal agency charged with oversight of transportation functions. The [FMCSA \(Federal Motor Carrier Safety Administration\)](#), which administers CSA, is part of the DOT.

### **Driver Fitness:**

One of the seven [BASICs](#). This category of violations refers to drivers, who are unqualified due to medical issues, lack of training, or inexperience. Example violations: being medically unqualified to operate a commercial motor vehicle, lack of a valid commercial driver's license (CDL).

### **Driver SMS:**

This part of the [SMS](#) allows safety investigators to look at driver safety performance over a 36-month period to identify problems with safety. If violations are discovered, the [FMCSA](#) can take enforcement action against the driver, such as issuing a [NOV \(Notice of Violation\)](#) or [NOC \(Notice of Claim\)](#).

### **Early Contact Intervention:**

This is the first category in a series of progressive [interventions](#). These [interventions](#) are meant to identify specific safety issues so carriers can take quick steps to change them. [Warning letters](#) are a type of early contact intervention.

### **Hours of Service (HOS):**

One of the seven [BASICs](#). Violations in this category result from driving while sick or fatigued, or from failing to comply with [HOS \(Hours-of-Service\)](#) regulations. Example violations: incomplete or inaccurate logbook, driving while ill, driving while fatigued, exceeding [HOS \(Hours-of-Service\)](#).

### **FMCSA (Federal Motor Carrier Safety Administration):**

The Federal Motor Carrier Safety Administration of the U.S. Department of Transportation (DOT), which is the federal authority responsible for monitoring and administering CSA rules.

**Follow-On Intervention:**

These are the final category in a series of progressive interventions. There are four types of follow-on interventions: [CSP \(Cooperative Safety Plan\)](#), [NOV \(Notice of Violation\)](#), [NOC \(Notice of Claim\)](#) and [OOS \(Operations Out-of-Service Order\)](#).

**HOS (Hours of Service):**

These regulations from the [FMCSA](#) set limits for when and how long drivers may operate commercial vehicles.

**Interventions:**

CSA uses three categories of interventions to address safety issues: [Early Contact](#), [Investigation](#) and [Follow-on](#).

**Investigations:**

The second category of progressive interventions, there are three types of investigations: Offsite, Onsite Focused, and Onsite Comprehensive. Investigations range from offsite investigations that require the submission of documents to be examined by a state or the FMCSA to detailed onsite investigations that examine all aspects of the carrier's operation. The Investigation category of interventions is the next progressive category after Early Contact Interventions and precedes the final category, Follow-on Interventions.

**MVR (Motor Vehicle Report):**

This report details a potential employee's driving record. It verifies that an applicant has the driver's license claimed. It may provide information regarding irresponsible behavior, including whether there is a history of substance abuse, repeated traffic violations, failures to appear or unpaid fines.

**NOC (Notice of Claim)**

A type of [Follow-on Intervention](#), this notice is issued in severe safety cases that may involve civil penalties. It is the final progressive step taken before issuing an order to cease motor vehicle operations entirely.

**NOV (Notice of Violation)**

A type of [Follow-on Intervention](#), this formal notice may be issued when violations are severe but do not require civil penalties, or when the problems can be quickly fixed by a cooperative carrier. The carrier must show evidence that the issue has been fixed (or effectively challenge the violation) to avoid further interventions or fines.

**Offsite Investigation**

This type of [investigation](#) requires carriers to submit documents for examination offsite. The purpose of these investigations is to identify and evaluate the cause of safety issues.

**Onsite Comprehensive Investigation**

This type of [investigation](#) takes place at the carrier's place of business. May result when extensive, repeated, or worsening safety issues exist, or due to a fatal crash or complaint. These investigations examine all areas of the carrier's business.

**Onsite Focused Investigation**

This type of [investigation](#) takes place at the carrier's place of business and is an attempt to evaluate and identify the cause of safety issues. The scope of these investigations is specific, targeted only to the problem areas identified.

**OOS (Operations Out-of-Service Order)**

The last and most serious in the series of progressive follow-on [interventions](#), this order requires the carrier to stop motor vehicle operations entirely.

**PSP (Pre-employment Screening Program)**

These roadside inspection and crash records for drivers show a rolling three-year safety history for that driver. (Accident data is available for five years). This data is available to a carrier when a driver files an employment application. Congress mandated the PSP in 2005. Although it is not technically part of CSA, they are often grouped together because both were implemented at the same time.

**RDR (Request for Data Review)**

This part of the DataQS system helps carriers and drivers get errors on their FMCSA records corrected.

**SafeStat (Safety Status Measurement System)**

An earlier set of safety regulations that governed carriers, SafeStat was replaced by the [SMS \(Safety Measurement System\)](#).

**SFD (Safety Fitness Determination)**

The SFD refers to the roadside inspection and performance results for a carrier and details a two-year safety history. This information is available for all carriers and is part of CSA's safety evaluation process for identifying carriers that are unfit to operate.

**SMS (Safety Measurement System)**

The SMS refers to the method used to evaluate safety performance and report safety data to the public. The SMS includes information collected from roadside inspections and crash data, as well as the [intervention](#) methods prescribed to address any identified safety issues.

**Unsafe Driving**

One of the seven [BASICS](#). This violation refers to driving carelessly or dangerously. Example violations: reckless driving, speeding, improper lane change.

**Vehicle Maintenance**

One of the seven [BASICS](#). This violation refers to a failure to properly maintain a commercial motor vehicle (CMV). Example violations: mechanical defects, brakes, lights, or failure to repair mechanical defects.

**Warning letter**

A type of [early-contact intervention](#), this letter mailed to carriers specifies problems with [BASICS](#), giving the carrier an early opportunity to correct safety issues.