



Safety Audits

A Move Toward Effectiveness and Efficiency

As motor carrier companies know, noncompliance undermines safety and usually results in costly repairs and penalties.

Safety on our highways is and must continue to be a priority for the transportation industry as a whole. The Comprehensive Safety Analysis (CSA) 2010 is a new system that will ensure safety is at the forefront of our work. This program will redefine audits as we currently

recognize them through focused and comprehensive investigations. It is believed that this transformation will ultimately reduce truck related crashes by implementing a new protocol for enforcement as well as improving safety monitoring, evaluation and intervention processes.

We know that CSA 2010 will affect every carrier in the nation. This stringent process charts immediate and continuous observations of carrier and driver performance. As the Federal Motor Carrier Safety Administration (FMCSA) shifts from one regulation model

towards a more efficient and effective model, it is pertinent that companies are prepared to adhere to this new compliance program and understand the regulations to which they are subject.

CSA 2010 focuses on three main elements: measurements, safety evaluation and intervention.

- **Measurement** - quantifying seven behavioral categories
- **Safety Evaluation** - determining the condition of the seven behavioral categories
- **Intervention** - ranges from warning letters, onsite comprehensive investigations, notices and out-of-service orders

CSA 2010 uses a motor carrier's data from roadside inspections, including all safety-based violations, warning violations, overweight citations, state reported crashes and the federal motor carrier census to quantify performance in the following Behavior Analysis Safety Improvement Categories (BASIC's):

- **Unsafe Driving:** Example violations- speeding, reckless driving, improper lane change and inattention.
- **Fatigued Driving:** Example violations- hours of service, logbook and operating a commercial motor vehicle (CMV) while ill or fatigued.
- **Driver Fitness:** Example violations- failure to have a valid and appropriate commercial driver's license and being medically unqualified to operate a CMV.
- **Controlled Substances and Alcohol:** Example violations- use or possession of controlled substances or alcohol.

- **Vehicle Maintenance:** Example violations- brakes, lights and other mechanical defects as well as failure to make required repairs.
- **Improper Loading/Cargo Securement:** Example violations - improper load securement, cargo retention, size and weight and hazardous material handling.
- **Crash:** Histories or patterns of high crash involvement including frequency and severity. This is based on information from state-reported crashes.

(Information from CSA 2010 SMS Fact Sheet - <http://csa2010.fmcsa.dot.gov>)



FMCSA representatives recently spoke to Texas Motor Transportation Association's Safety Maintenance Council regarding additional changes motor carriers would face with CSA 2010. Representatives commented that data is currently being collected on carriers and that data will be applicable in safety evaluations when CSA 2010 goes into effect this summer. Twenty-four months of captured information will be used to evaluate the carrier.

A carrier's score for each BASIC category depends on the number of adverse safety events and the severity of violations. All accident data goes into the CSA system, but carriers may have the opportunity to appeal accidents that aren't considered recordable. It is important to note that most recent events are weighed more heavily in the evaluation. If carriers currently have a high driver safety evaluation area (SEA) value then there is a strong probability that the company will be selected for an audit in the new system.

Texas carriers may be able to assess their information as soon as January and warning letters will begin being issued at this date as well. It was also mentioned that carriers rated as satisfactory under the current system may find themselves subject to an audit with the new performance based measurement system. Captured information can be viewed by carriers through the online resource, Compass Portal, at <https://portal.fmcsa.dot.gov>.

It is evident that conversion to this new system from current audit regulations will be a learning process for everyone involved. We want to make sure that industry representatives do not find themselves unprepared for these changes. By and large, CSA 2010 will promote accountability in safety compliance. We ask carriers to be proactive in preparation for this new analysis. The movement towards greater effectiveness and efficiency will ultimately benefit the entire industry.

For more information about CSA 2010, please visit the Federal Motor Carrier Safety Administration (FMCSA) website at <http://csa2010.fmcsa.dot.gov> or call 1-800-832-5660.

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

- CSA 2010 provides a set of tools to address carrier's safety problems; the CR is a one size fits all tool.
 - CSA 2010 interventions provide the ability to focus on specific safety problems while the CR requires a broad examination of the carrier.
 - CSA 2010 interventions focus on improving behaviors that are linked to crash risk, whereas CR is focused on broad compliance based on a set of critical violations.
 - CSA 2010 focuses on on-site investigations and off-site investigations are less resource intensive and less time consuming for the carrier; CR's are resource intensive.
 - CSA 2010 investigations may take place at a carrier's place of business or off-site; CR's are generally conducted on-site.
- (Information from FMCSA CSA 2010 Web site: <http://csa2010.fmcsa.dot.gov>)

To fully prepare for CSA 2010, we must also be well versed with the current system of evaluation.

- Currently, audits address compliance and safety in six comprehensive categories; that of general, driver, operational, vehicle, hazardous material and accidents.
- **General:** inspection of training records, liability coverage and utilization of an accident register
 - **Driver:** inspection of CDL's, qualification, MVR's, training and drug and alcohol testing
 - **Operational:** inspection of driver logs and hours of service compliance
 - **Vehicle:** review of inspection, repair and maintenance files
 - **Hazardous Materials:** inspection of compliance and training
 - **Accidents:** inspection of frequency rate

TMTA is a trade organization dedicated to advocating sound public policies, providing excellence in education and training and promoting a safe, dependable and cost-effective motor transportation system to better serve the people of Texas. Eighty-two percent of Texas communities receive their goods exclusively by truck.

To help carriers abide by current safety audit standards in preparation for CSA 2010, TMTA's Training Institute hosts a seminar that addresses the Federal Motor Carrier Safety Regulations. This hands-on class, with former U.S. DOT official Leon Feazell, helps attendees recognize if they are ready for an audit and know how to effectively maintain driver files. Required alcohol and drug supervisor training is included and attendees also learn how to respond to a penalty claim letter. This instruction is pertinent to getting your company in shape for the implementation of CSA 2010.

A "How to Prepare for a Safety Audit" seminar will take place in Austin Texas on December 9. For additional information please visit TMTA at www.tmta.com.

