



Training notes from the woods & the classroom

May 2011

CSA: Comprehensive Safety Analysis

In March of last year we discussed the Federal Motor Carrier Safety Administration (FMCSA) initiative to reduce CMV crashes, fatalities and injuries which is Comprehensive Safety Analysis (CSA). The enforcement mechanism of CSA has three distinct steps: intervention, investigation and follow-on action. The intervention step is basically “a tap on the shoulder” and consists of a warning letter. The investigation step is an on-site and focused review of a carrier’s performance in the Behavioral Analysis and Safety Improvement Categories (BASIC’s) that are deficient.

The seven BASIC’s are: Unsafe Driving, Fatigued Driving (Hours-of-Service), Driver Fitness, Controlled Substances/Alcohol, Vehicle Maintenance, Cargo-Related and Crash Indicator. A carrier’s measurement for each BASIC depends on the number of adverse safety events, the severity of violations, crashes and when the events occurred (more recent events are weighted more heavily). After a measurement is determined, the carrier is then placed in a peer group. Percentiles from 0 to 100 are then determined by comparing the BASIC measurements of the carrier to the measurements of other carriers in the peer group. A percentile 100 indicates the worst performance.

All CSA data, including scores are available to the public at <http://ai.fmcsa.dot.gov/sms> then click on Advanced Search. It’s important to know your score and to review it at least quarterly.

The investigation and follow-on action step is after FMCSA or a state agency completes its review. There are four possible follow-on actions: cooperative safety plan, notice of violation, notice of claim and out of service order.

The cooperative safety plan is voluntarily developed by the carrier based on a template provide by FMCSA. The notice of violation is similar to a warning at roadside, where a police officer pulls you over for speeding but doesn’t ticket you. You are required to respond to a notice of violation by detailing how you intend to address the violation.

The next step up is notice of claim. Here CSA enters the penalty phase. The notice of claim is the most severe level, short of issuing an out of service order. The major change under CSA is that this is the last resort rather than the only resort. The final and ultimate step is the out of service order. When the agency starts enforcement of a claim, the carrier has the right of appeal if it feels it is being treated unjustly said William Quade, FMCSA associate deputy administrator of enforcement and compliance. “The carrier has the ability to come in and present information to us regarding the claim...and even seek arbitration if they think our penalties are unreasonable,” he said. For example, if the agency assesses a safety score based in part on the carrier’s crash rate, the carrier may present information that these crashes were not preventable.

With the new set of tools and the accelerated pace of updating CSA scoring, it is more important than ever for carriers to follow the federal regulations.

“They’re being watched: their performance is being tracked,” CVSA’s Stephen Keppler said.

“They can decide to take proactive steps and correct themselves on their own, or they can roll the dice and risk being targeted for one of the interventions,” he said.

It’s important to educate yourself and your drivers about CSA and to train your drivers to reduce the number of unsafe events. A good place to start is <http://csa.fmcsa.dot.gov/>

A couple of myths of CSA are that violations will count as points on the driver’s personal motor vehicle record. That’s not so. Another myth is that driver’s will get safety ratings. Not so, however, driver profiles from FMCSA’s Driver Information Resource become available online to carriers later this year. We’ll discuss that next month.

Drive Safe!

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