

Seven tips for improving CSA scores



What is CSA?

The Compliance, Safety, Accountability program (CSA 2010, or just CSA) is a Federal Motor Carrier Safety Administration (FMCSA) initiative to improve safety and reduce commercial motor vehicle (CMV)-related crashes, injuries and fatalities. CSA was rolled out in December 2010 and introduces a new enforcement and compliance model using information gathered during roadside inspections. It was also introduced to improve the efficiency of Department of Transportation (DOT) auditors by allowing them to focus on approximately 40% more at-risk carriers. To calculate a carrier's CSA score, auditors review data from the previous 24 months of service. Data such as crash reports, roadside inspections and DOT interventions are all factors in determining a score. Scores are shown as a percentage relative to other, similar carriers, with 0% being the best and 100% the worst. For instance, if a carrier has a score around 80%, that carrier has a CSA that's 80% worse than other, similar carriers. For scores around 80% or higher, the DOT will normally put an intervention program in place.

For more information on how scores are calculated, see the CSA website: csa.fmcsa.dot.gov

Why are CSA scores important?

Improving your CSA score benefits you, your drivers and other stakeholders. CSA scores are public, which means carriers with higher scores are often preferred by customers and subject to fewer DOT audits or roadside inspections. Better CSA scores also lead to lower insurance premiums, which can save you thousands every year.

Aside from keeping a fleet compliant, the greatest reason for taking your CSA score seriously is that it's a great way to provide a good working environment for your team so they get home to their families safely at the end of the day. Companies that strive to improve their working environments often have better reputations, which leads to better success recruiting

"Motor carriers are paying more attention than ever to their safety performance."

– Anne Ferro, FMCSA administrator, at the introduction of CSA 2010



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What's your current CSA score? Is it improving or getting worse? The good news is that a bad score is not permanent. The bad news is that a good score can just as easily take a turn for the worse.

What makes up my CSA score?

A CSA score is a rating made up of any violations counted against a carrier over the last 24 months. There are over 700 different violations, but they all fit into one of the following seven categories, which are referred to as behavioral analysis safety improvement categories, or BASICS.

- **Unsafe driving.** Speeding, reckless driving, improper lane change and inattention.
- **Fatigued driving.** Hours of service (HOS) logbook, and operating a commercial vehicle while ill or fatigued.
- **Driver fitness.** Failure to have a valid and appropriate commercial driver's license and being medically unqualified to operate a commercial vehicle.
- **Controlled substance or alcohol.** Use or possession of controlled substances or alcohol.
- **Vehicle maintenance or cargo securement** Brakes, lights and other mechanical defects and failure to make required repairs.
- **Hazardous materials.** Improper load securement, cargo retention and hazardous material handling.
- **Improper crash indicators.** Histories or patterns of high crash involvement, including frequency and severity.

Companies that strive to improve their working environments often have better reputations, which leads to better success recruiting great drivers.

Seven tips to improve your CSA score

These guidelines should become an integral part of your fleet's culture, and shouldn't be considered a quick fix. Following these will help you to achieve and maintain a good CSA score.

Remember, carrier information, current score and calculation data is publicly available. If you don't know your current CSA score, search by your carrier name or DOT number at ai.fmcsa.dot.gov/sms/

1. Verify your data.

Since even small infractions affect your CSA score, it's important to verify inspection data. Make sure that the only bad inspections on your record are valid, accurate and warranted.

Challenge incorrect inspection data.

Review your inspection data online at <https://dataqs.fmcsa.dot.gov> and make sure all the information is correct, including basic information such as the driver and vehicle belonging to your fleet.

If you wish to challenge inspection data (referred to as a request for data review, or RDR), keep in mind the following points:

- Have clear factual evidence for why you feel the data is incorrect.
- Clearly list issues such as Commercial Vehicle Safety Alliance (CVSA) out of service, missing records, incorrect information or duplications.
- Remember that the review officer is likely a peer of the officer who made the original notation.
- Provide supporting documentation, including electronic logging device (ELD) records, photos and eyewitness accounts.
- Make sure chassis violations are assigned to the chassis carrier.

Note: You have up to two years to challenge inspection data.

Keep carrier registration data up to date.

Carriers under CSA are required to complete an MCS-150 form at least once every two years, as well as when they first start trading. This form must be completed even if you have stopped trading, you no longer travel interstate or your information hasn't changed. Not doing so can result in fines of up to \$10,000 and deactivation of your DOT number. Update your truck and driver numbers, but particularly your mileage. Keep it as high as possible, but do not falsify the data.



You should have clear policies established and commitment from all managers to both preach and practice the company safety standards.

2. Establish management controls.

The purpose of the DOT's safety management cycle is to verify whether managers have adequate safety management controls. That means you need to establish roles and responsibilities, including defining standards for hiring drivers.

If drivers or other employees are off track and not performing well, managers need to take appropriate action. Some fleets have a three-strike process, but whatever your policy is, it should be consistent and firm but fair.

Make sure your management controls are in order before looking at safety issues with your drivers. You should have clear policies established and commitment from all managers to both preach and practice the company safety standards.

To learn more about the safety management cycle, review the resources available on the DOT website.

Solution spotlight: Set driving thresholds.

Verizon Connect Fleet allows you to specify thresholds for driver behaviors you want to monitor and manage. You can set thresholds for events such as speeding, swerving or harsh braking that will trigger a management alert. You can also limit alerts to specific teams or drivers. For example, you may want to apply stricter controls on drivers transporting hazardous materials than general cargo carriers.

3. Hire good drivers.

With 87% of large truck accidents attributed to driver error, hiring the right driver is one of the most important things you need to get right.¹

An overview of the driver selection process typically looks like this:

- 1. Recruit to your standards.**
- 2. Screen candidates.**
- 3. Review and verify references.**
- 5. Interview.**
- 6. Interview for operations fit.**
- 7. Make tentative offer.**
- 8. Orientation.**
- 9. Mentor.**

Remember this rule of thumb when hiring: Past behavior is a strong predictor of future behavior. Set high standards and screen for the candidate that will help, not hurt, your CSA score.

4. Dispatch within limits.

Staying safe and CSA compliant isn't just the sole responsibility of drivers. Dispatch workers and the driver's manager need to do their part too. One key area involves knowing and complying with HOS regulations as defined in regulation 395.3 (this regulation varies depending on the type of commercial driving you're doing, e.g., bus driving).

It's possible to hire your own accident. Normally this happens when you hire the wrong skill set: You hired a driver who wasn't qualified to handle these large pieces of equipment. That wrong hire will lead to an accident – an accident you could have prevented by tightening up your screening process.

To be successful, it's wise to make it clear to everyone at your company that these rules are nonnegotiable. If they aren't willing to comply, then they probably aren't a good fit for your business. Dispatchers need to make sure they're not overloading drivers beyond their legal limits, and drivers need to make sure they're taking their required breaks and maintaining their logs.

HOS limits (regulation 395.3)

- Eleven hours of driving after 10 hours' rest
- No driving after the 14th consecutive hour after coming on duty
- Except for short-haul drivers, no driving permitted after the eighth consecutive hour after the end of a 30-minute off-duty or sleeper-berth period
- No driving after being on duty 60 to 70 hours in seven to eight days
- Reset to zero after 34 hours off if:
 - At least 168 hours after the beginning of the last qualified 34-hour period.
 - Two periods from 1 AM to 5 AM must be within break.

In fact, one of the most common HOS violations is not keeping the logbook current, or not having one at all. If this is a problem for your drivers, then consider switching to electronic logging devices (ELDs) as soon as possible.



Tied to a unique ID, ELDs can quickly show a driver (or roadside inspector) remaining driving hours and an up-to-date log of activity.

Solution spotlight: automated, electronic HOS

Maintaining paperwork or manually calculating driving hours remaining is not fun for anyone, but there's an easy way to remove that chore from your drivers' working day while staying compliant. ELDs are electronic black boxes hardwired into the truck to automatically record driving events. Tied to a unique ID, they can quickly show a driver (or roadside inspector) remaining driving hours and an up-to-date log of activity. Verizon Connect WorkPlan can automatically sync with the back office to make sure drivers aren't dispatched on routes that would exceed their limit.

WorkPlan is compliant with regulation 395.15, so it replaces paper copies, makes roadside inspections quicker and is simple and easy to use. It also works on iPhone®, iPad® and Android® devices.

Because cargo is highly visible, drivers are likely to get pulled over if it isn't securely tied down, which will in turn damage your CSA score.

5. Maintain your vehicles: PM, pretrip and DVIR.

It's vital that you have a preventive maintenance (PM) program and do systematic maintenance on all of your vehicles, trucks, trailers and dollies. Your drivers should be well trained to do pretrip inspections and driver vehicle inspection reports (DVIRs). The best way to train them is to crawl into the truck with them and show them exactly how to do it. How long they spend on an

inspection is a matter of company policy, but it's wise to set high standards and hold employees accountable.

Inspections: What's required by law?

Federal regulation 396.13 states that before driving a motor vehicle, the driver shall:

- (a) Be satisfied that the motor vehicle is in safe operating condition;
- (b) Review the last driver vehicle inspection report; and
- (c) Sign the report, only if defects or deficiencies were noted by the driver who prepared the report, to acknowledge that the driver has reviewed it and that there is a certification that the required repairs have been performed. The signature requirement does not apply to listed defects on a towed unit which is no longer part of the vehicle combination.

Secure your cargo properly.

Road debris played a role in an average of 50,000 police-reported vehicle crashes between 2011 and 2014, so your drivers should take cargo securement seriously. Plus, because cargo is highly visible, drivers are likely to get pulled over if it isn't securely tied down, which will in turn damage your CSA score. When you put anything on any vehicle—even a box truck or a reefer—it can't move. Drivers should be sure all cargo is blocked, braced and tied down.²

Schedule A or B: What's the difference?

Schedule A is essentially a pretrip inspection performed by a mechanic and will generally be done once a month. However, the more often you can get a mechanic on a vehicle, the less likely the officer on the road is going to find something wrong.

Schedule B is sometimes referred to as a wet service and generally relates to keeping the oil healthy. Some built-in telematics platforms, such as Ford Telematics Powered by Telogis, offer oil life as a diagnostic data point that can help automate oil-change schedules.

Annual inspections on all of your equipment—every truck, trailer, dolly or other vehicle—should be a standard operating procedure for your fleet. After an annual inspection, update the decal on the vehicle and keep the inspection on file for 14 months. Make it a

policy to never allow any vehicle on the road with an inspection date older than 12 months.



Are your employees pencil whipping? If you're not auditing inspections, then they'll quickly realize they can just shortcut the process, ticking boxes without actually doing the work.

Solution spotlight: Automate maintenance scheduling.

Use fleet-maintenance software to monitor, manage and record scheduled maintenance for your vehicles. Verizon Connect WorkPlan offers accurate mileage tracking, mobile inspection forms and automated alerts to organize inspections and repairs efficiently, minimizing downtime and speeding up investigations.

6. Train your team to comply with hazmat regulations.

If your fleet transports hazardous materials, then you and your drivers should be thoroughly familiar with the hazardous materials regulations (HMR). Questions about HMR are likely to come up during compliance reviews or roadside inspections.

Since fleets qualified to carry hazmat are required to have a better CSA score than regular cargo carriers, it's even more important to pay attention to the following protocol for transporting dangerous goods.

Common issues that your team needs to be trained on include:

- Are hazmat goods classified and packaged correctly?
- Do goods have shipping papers?
- Do goods need markings, labels or placards?
- Is an emergency-response guide kept in the vehicle?

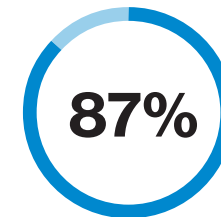
If you're not already familiar with the DOT's hazmat regulations, you can learn more online at www.fmcsa.dot.gov/regulations/hazardousmaterials

Solution spotlight: route compliance

Hazmat drivers caught transporting on restricted routes can hurt your CSA score and incur costly infringements. Verizon Connect Navigation offers commercial-grade navigation that can comply with truck-legal routes, providing turn-by-turn directions specific to the truck's size and load type.

7. Have an effective safety committee.

Not all carriers have a safety committee, but it's an excellent way to keep your fleet safety conscious and make sure that everyone learns from mistakes. The safety committee's job is to figure out whether an accident could have been prevented. They should dig deep to learn the root cause. This isn't just about your CSA score, it's about keeping your drivers safe. Don't pay lip service to the idea of safety, but instead, put in place an active committee. For a safety committee to be effective, it needs to have the authority to make companywide changes and hold everyone accountable.



“Eighty-seven percent of all accidents were caused by drivers, 10% were caused by equipment and only 3% by the environment.”

– *The Large Truck Crash Causation Study*, FMCSA. The study is based on a three-year data-collection project conducted by the FMCSA and the National Highway Traffic Safety Administration (NHTSA) of the DOT.

In some cases, this may require you to let go of drivers who are just not cut out for the job. A recent accident causation study showed that 87% of all accidents were

caused by drivers, 10% were caused by equipment and only 3% by the environment. If any of your drivers are repeatedly having accidents, then they should move on, as much for their own safety as everyone else's.

Solution spotlight: instant driver feedback

To speed up the feedback loop, why not use an automated coaching system? Verizon Connect Coach is an objective, neutral software solution that works with in-cab alerts to offer drivers immediate feedback on driving habits. Part of what makes Coach so effective in improving driver behavior is the leaderboard approach, or the gamification of driver safety. Drivers can compete against each other to improve their rating. Built-in safety videos are presented to drivers based on their actual performance to offer customized training.

Make a commitment to start today.

The hard part is putting all these tips into action, but with the potential consequences for not doing so, it's well worth the effort. The best place to start is with an assessment. You can't fix anything until you know what to fix. Identify the areas that are weak, and write procedures to strengthen them. With strong procedures in place, you can establish systems to help everyone follow the correct procedures. Put the emphasis on training rather than discipline. At least once a year, conduct a full internal audit and make your team accountable.

Remember, if you just don't have time to do all of this yourself, there are companies, such as DOT Safety Plus, that can help you. Change might be slow to begin with, but over time, and with consistent management support, change will happen—and you can look forward to a better CSA score.³

Sometimes it's what you don't see.

When you do your own assessment of current safety procedures, it's easy to overlook the unseen. A classic tale of statistics highlights what's known as selection bias. During WWII, statistician Abraham Wald was asked to help the British decide where to add armor to their bombers. After analyzing the records, he recommended adding more armor to the places where there was no damage! This seems backward at first, but Wald realized his data came from bombers that survived. That is, the British were only able to analyze the bombers that returned to England; those that were shot down over enemy territory were not part of their sample. The damage to these surviving planes showed where they could afford to be hit.



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For managers choosing where to focus their efforts in order to improve their CSA score, the lesson is clear: Don't be fooled by what you see. You need to dig deep to really understand your fleet's weak points. Audit regularly!

About Verizon Connect

Verizon Connect develops and markets a cloud-based mobile research management (MRM) software platform for companies that require dynamic routing, commercial navigation, advanced telematics and mobile apps to keep drivers safer, manage compliance and more. We invite you to engage with us to learn more about how we can connect the vehicles, people and work that's being done outside the four walls of your business.



The Verizon Connect MRM platform optimizes and automates your business to drive safety, productivity and efficiency.

Once connected, the Verizon Connect MRM platform optimizes and automates your business to drive safety, productivity and efficiency. Verizon Connect also builds its technologies into vehicles and equipment from leading manufacturers, including Ford, GM, Hino, Isuzu, Mack, Volvo and Manitowoc Cranes, eliminating the need for hardware installations. Verizon Connect also has strategic partnerships with Apple and Element to deliver opportunities to improve every aspect of your technology deployment and implementation.

Expert advisor: Jeff Simon, MBA, CTP

Jeff Simon has more than 37 years of experience in transportation management and safety. His expert understanding of motor carrier safety (state and federal) and hazardous materials regulations has led to his status as a nationally recognized speaker and author. Jeff regularly presents seminars and onsite training, drawing from the strong practical operations management background he gained when he worked as an operations and equipment manager. He also owned and operated his own company, and his more than 500,000 miles behind the wheel as a commercial driver gives him a hands-on perspective. He has served on national enforcement and industry committees, assisting in setting the direction for future legislation.

Learn more.

For more information, contact your Verizon Wireless business specialist or visit verizonconnect.com

¹ <https://www.fmcsa.dot.gov/safety/research-and-analysis/large-truck-crash-causation-study-analysis-brief>

² http://newsroom.aaa.com/wp-content/uploads/2016/08/RoadDebris_REPORT_2015.pdf

³ <https://people.ucsc.edu/~msmangel/Wald.pdf>

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