



Seven Tips

FOR IMPROVING CSA SCORES

By Jeff Simon, MBA CTP



What is CSA?

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 (hence why it is sometimes referred to as CSA 2010) and introduces a new enforcement and compliance model utilizing information obtained from 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.

Data collected over the last 24 months (from crash reports, roadside inspections and DOT interventions) is used to calculate a carrier's score.

Scores are shown as a percentage (relative to other, similar carriers) with 0% being the best and 100% the worst. The DOT normally instigates an intervention program around 80% (which means the carrier has a CSA score worse than 80% of other carriers).

The CSA website (<https://csa.fmcsa.dot.gov>) provides information on the methodology for calculating scores.



Expert Advisor: **Jeff Simon MBA CTP**

Jeff 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 (HM) regulations has led to his status as a nationally recognized speaker and author.

Jeff regularly presents seminars and on-site training, drawing from his strong practical operations management background 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.



Why is this 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. It also means lower insurance premiums, which can save you thousands every year.

Recruiting good drivers is often easier since most drivers want to work for a firm that has a good reputation.

Aside from keeping a fleet compliant, the overriding reason for taking your CSA score seriously should be a continual striving as a company to provide a good working environment for your team so they get home to their families safely at the end of the day.

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.



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

FMCSA ADMINISTRATOR, ANNE FERRO AT THE INTRODUCTION OF CSA 2010

The fact is, no matter where you are currently ranked among the more than 700,000 commercial active motor carriers in the U.S., you need to be paying constant attention to your CSA score.



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 (referred to as BASICs - Behavioral Analysis Safety Improvement Categories).

→ **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.

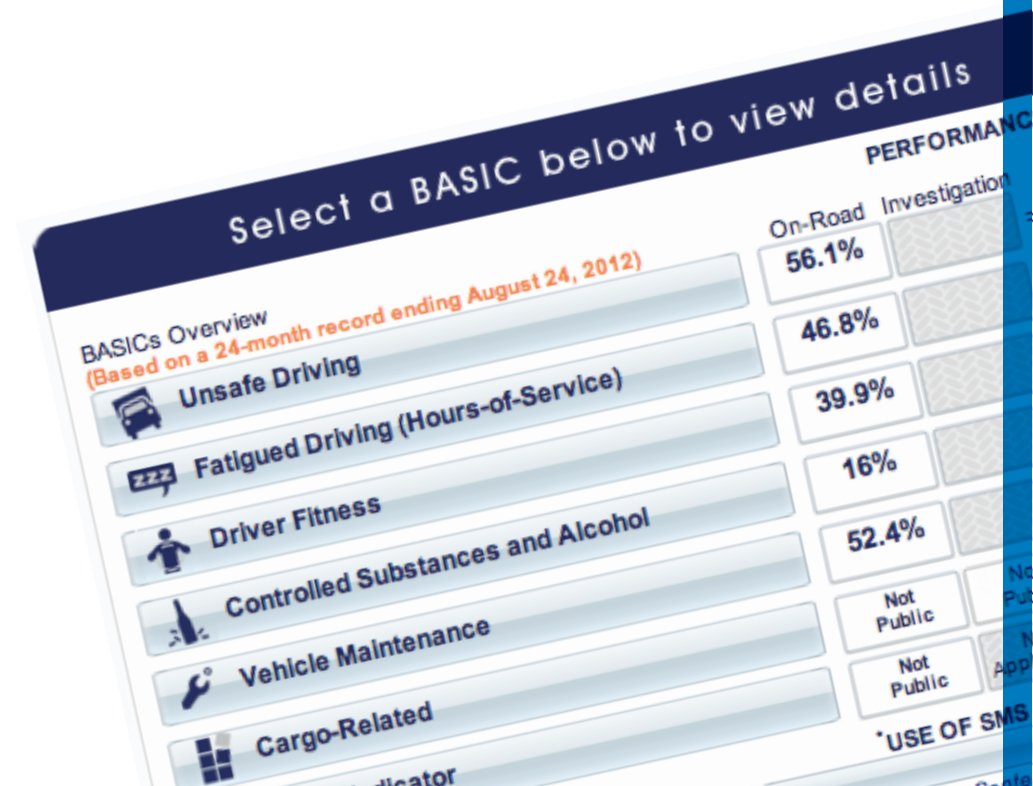
→ **DRIVER FITNESS** - Failure to have a valid and appropriate commercial driver's license and being medically unqualified to operate a commercial vehicle.

→ **CONTROLLED SUBSTANCE/ALCOHOL** - Use or possession of controlled substances/alcohol.

→ **VEHICLE MAINTENANCE/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.



Here are **SEVEN TIPS** to improve your CSA score

These guidelines are designed to be practices that become an integral part of your fleet's culture, and should not be considered a quick fix. This will help you to achieve and maintain a good CSA score.



If you don't know your current CSA score visit the official website (<https://ai.fmcsa.dot.gov/sms/>) and search by carrier name or USDOT number. Carrier information, current score and calculation data is publicly available.



→ Tip #1 Verify your data

The importance of verifying your inspection data is reinforced when you realize that it generally takes 20 good inspections to offset one bad inspection. So 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 it 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 an RDR - Request for Data Review), keep in mind the following points:

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

YOU HAVE UP TO TWO YEARS TO CHALLENGE INSPECTION DATA.



Keep carrier registration data up-to-date

Carriers under CSA are required to complete a 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, 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 USDOT number.

Update your truck and driver numbers, but particularly your mileage. Keep it as high as possible, obviously without falsifying the data.

→ Tip #2 Establish management controls

The purpose of 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.

VIEW SAFETY MANAGEMENT CYCLE

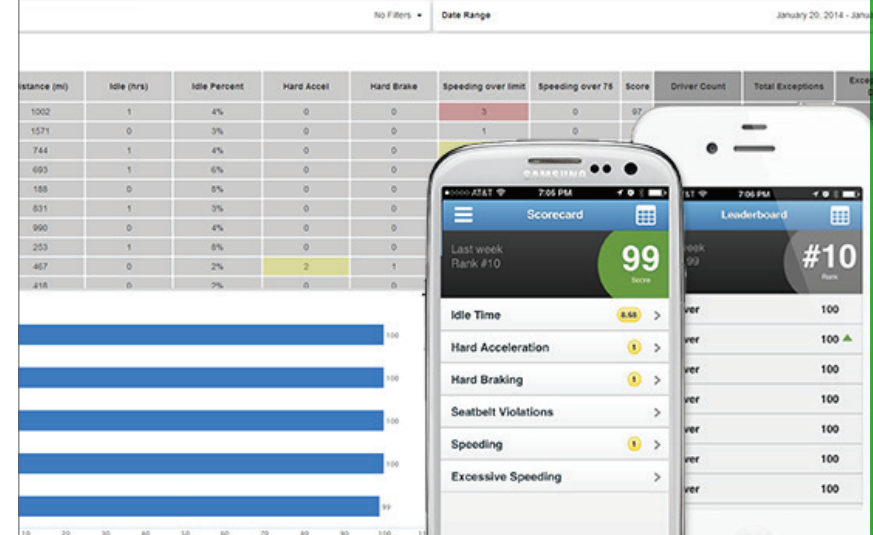
If somebody is off track and not performing like they should, then you as a manager need to do something about it. Some fleets have a three-strike process. Whatever your policy be consistent, firm but fair.

Make sure your management controls are in order before looking at safety issues with your drivers.

Before looking at your drivers make sure you 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 online resources from the DOT.

"It's a pity to shoot the pianist when the piano is out of tune."

RENE COTY, FRENCH STATESMAN.



Solution spotlight - Set driving thresholds

Telogis Fleet allows you to specify thresholds for driver behaviors you want to monitor and manage. Decide thresholds for events such as speeding, swerving or harsh braking that will trigger a management alert. Alerts can be limited to specific teams or drivers. For example you may want to apply stricter controls on drivers transporting HazMat than general cargo carriers.

→ Tip #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.

[DOWNLOAD FREE DRIVER SCREENING TEMPLATE \(PDF\)](#)

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

- Recruit to your standards
- Screen candidates
- Review and verify references
- Check driving record
- Interview
- Operations fit interview
- Tentative offer pending
- Orientation
- Mentoring

Remember the 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.



“It’s possible to hire your own accident. Normally this happens when you hire the wrong skill-set: you hired a driver that 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.”

JEFF SIMON

→ Tip #4 Dispatch within limits

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

It has to be clear that these rules are non-negotiable for everyone who works for you - if they don't get it or aren't willing to comply then they're not 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.

HOURS OF SERVICE LIMITS (395.3)

- 11 hours of driving after 10 hours' rest
- No driving after the 14th hour after coming on-duty (consecutive)
- Except for short haul drivers, a no driving permitted after 8th consecutive hour after the end of a 30-minute off-duty or sleeper-berth period
- No driving after being on-duty 60/70 hours in 7/8 days
- Reset to zero after 34 hours off if : *
 - At least 168 hours after beginning of last qualified 34-hour period
 - Two periods from 1am to 5am 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.

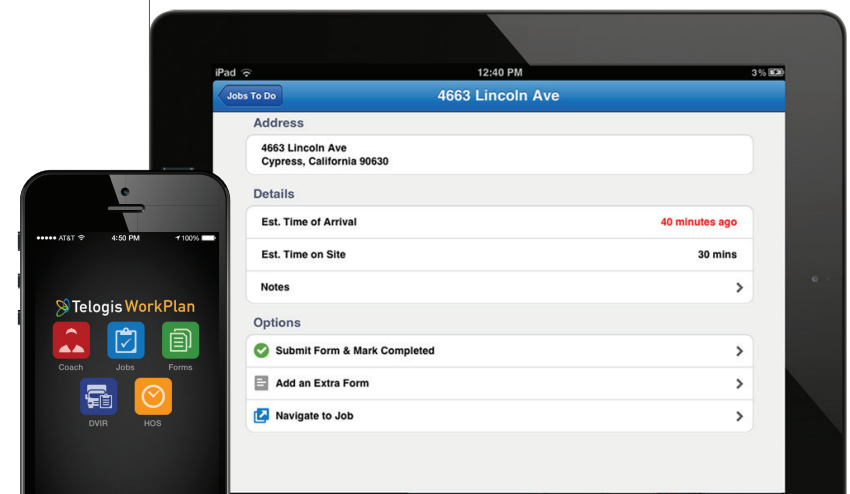
**This has been temporarily suspended until the FMCSA can complete a new fatigue study*

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 driver's 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. Telogis WorkPlan can automatically sync with the back office to make sure drivers aren't dispatched on routes that would exceed their limit.

Telogis WorkPlan is fully compliant with 395.15 so it replaces paper hardcopies, makes roadside inspections quicker and is simple and easy to use. It also works on iPhones, iPads or Android devices.



→ Tip #5 Maintain your vehicles: PM, pre-trip & DVIR

It's vital that you have a PM (Preventive Maintenance) program and do systematic maintenance on all of your vehicles, trucks, trailers and dollies.

Your drivers should be well-trained to do pre-trip inspections. 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 set high standards and then hold employees accountable.

INSPECTIONS: WHAT'S REQUIRED BY LAW?

Federal regulations 396.13 state 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.

We don't recommend it but a simple test for how well your drivers are performing their pre-trip inspections is to check for recent violations - how many of them should have been picked up during the pre-trip inspection?



Secure your cargo properly!

Stuff falling off trucks kills approximately 1,000 people every year so cargo securement should be taken seriously by your drivers. It's also highly visible so if cargo isn't securely tied down the chances of getting pulled over are high, and a sure way to damage your CSA score.

When you put anything on any vehicle, even a box truck or a reefer, it cannot move. It's got to be blocked and braced, and tied down.

**SEE DOT REGULATION 393.100
FOR MORE INFORMATION.**

→ Tip #5 Continued

SCHEDULE A OR B - WHAT'S THE DIFFERENCE?

Schedule A is essentially a pre-trip 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.

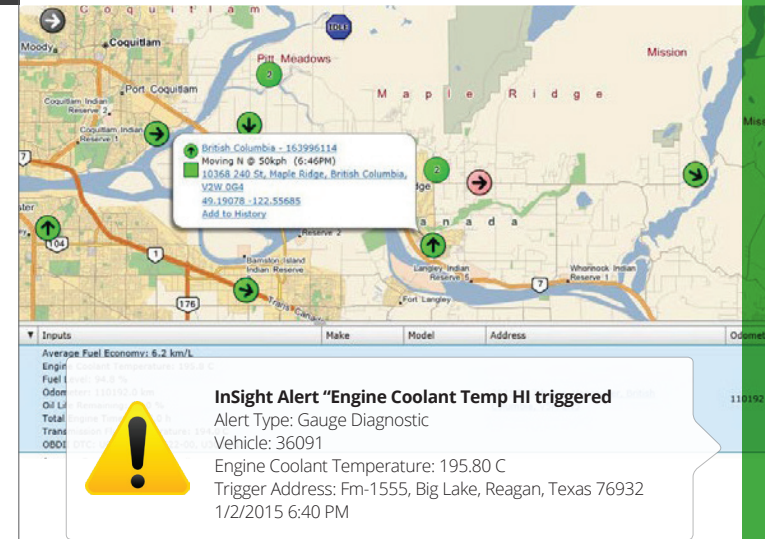
Schedule B is sometimes referred to as a wet service and generally relates to keeping the oil healthy. For most trucks this will be between 15,000 and 20,000 miles. Some built-in telematics platforms, such as Ford Telematics, offer oil life as a diagnostic data point that can help automate scheduling of oil changes.

Annual inspections, on all your equipment should be a standard operating procedure for your fleet - every vehicle, every truck, every trailer, every dolly has to be inspected at least once a year.

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.”

JEFF SIMON



The image shows a screenshot of a telematics dashboard. At the top, there is a map of British Columbia, Canada, with several green location pins. A pop-up window is visible over the map, displaying the following information: "British Columbia - 163996114", "Moving N @ 50kph (6:46PM)", "10366 240 St, Maple Ridge, British Columbia, V2X 3S4", and "49-19078-122-55685". Below the map, there is a table with columns for "Inputs", "Make", "Model", "Address", and "Odometer". The "Inputs" column is expanded, showing various vehicle metrics: "Average Fuel Economy: 6.2 km/L", "Engine Coolant Temperature: 195.80 C", "Fuel", "Oil Life", "Total", "Trans", and "OBD". A large yellow warning triangle with a black exclamation mark is positioned to the left of an alert box. The alert box contains the following text: "InSight Alert 'Engine Coolant Temp HI triggered'", "Alert Type: Gauge Diagnostic", "Vehicle: 36091", "Engine Coolant Temperature: 195.80 C", "Trigger Address: Fm-1555, Big Lake, Reagan, Texas 76932", and "1/2/2015 6:40 PM".



Solution spotlight - Automate maintenance scheduling

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

→ Tip #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) - it's likely to come up during a compliance review or roadside inspection.

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

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

- Are HazMat goods classified and packaged correctly?
- Does it have shipping papers?
- Does it 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/hazardous-materials.



Solution spotlight - Route compliance

HazMat drivers caught transporting on restricted routes can hurt your CSA score and incur costly infringements.

Telogis 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.

Visit www.telogis.com/navigation to learn more.

→ Tip #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 learning from mistakes.

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

The Large Truck Crash Causation Study (LTCCS) is based on a three-year data collection project conducted by the Federal Motor Carrier Safety Administration (FMCSA) and the National Highway Traffic Safety Administration (NHTSA) of the U.S. Department of Transportation (DOT).

[FIND OUT MORE](#)

The job of the safety committee is to figure out if an accident could have been prevented. Dig deep to learn the root cause. It's not just because you're worried about your CSA score - it's about keeping your drivers safe. Don't pay lip service - for a safety committee to be effective it needs to have the authority to make company-wide changes and hold everyone accountable.

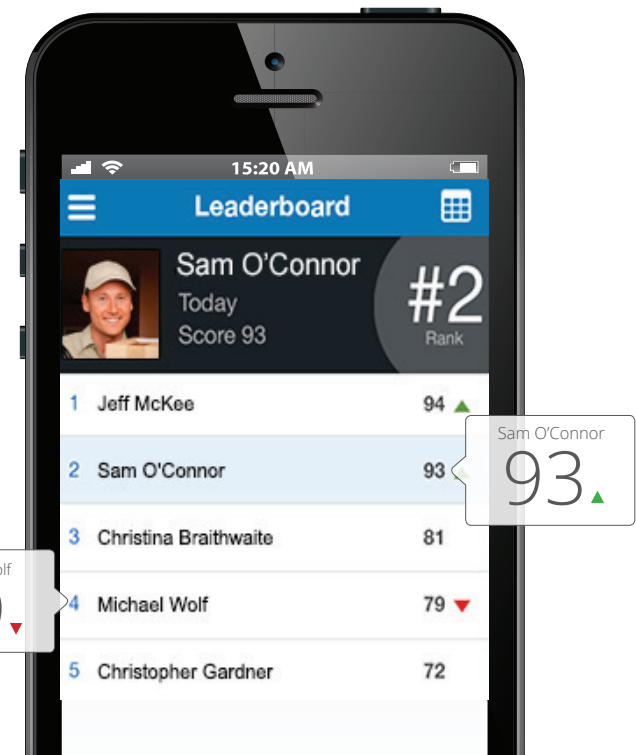
Sometimes it means letting drivers go who are just not cut out for the job. A recent accident causation study showed that 87% of all accidents were caused by drivers, 10% are caused by equipment and only 3% by the environment. If any of your drivers are repeatedly having accidents then they need to be moved on, as much for their own safety as anyone else's.

Solution spotlight - Instant driver feedback

To speed up the feedback loop why not use an automated coaching system? Telogis 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 **Telogis Coach** so effective in improving driver behavior is the leaderboard approach, or 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 this into action but if you don't the consequences will make you wish you had.

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 it's time to establish systems to make sure everyone, from the top down, is following procedure. Put the emphasis on training rather than discipline. At least once a year conduct a full internal audit - make your team accountable. Remember, if you just don't have time to do all this yourself there are companies, like **DOT Safety Plus**, that you can outsource to.

To begin with change might be slow but over time, and with consistent management support, change will happen and you can look forward to a better CSA score.





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. These bombers' wounds showed where they could afford to be hit.

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!





Telogis provides a cloud-based connected intelligence platform for companies that require route optimization, real-time work order management, commercial navigation, telematics and mobile integration services for their mobile workforces.

Telogis is dedicated to enhancing the value of its customers' businesses through intelligent integration of location technology, information and services. Telogis was established in 2001 and is headquartered in Aliso Viejo, Calif., with offices in Europe and Latin America as well as development centers in Austin, Texas; Toronto; and Christchurch, New Zealand. Telogis' products and services are used and distributed in more than 100 countries worldwide.

To learn more about Telogis, visit www.telogis.com
or call toll free: **866-TELOGIS (866-835-6447)**.

