

THE CSA 2010 DISPATCH

Frequently Asked Questions

FACT SHEET

1. What is CSA 2010?

Comprehensive Safety Analysis 2010, or CSA 2010, is a major Federal Motor Carrier Safety Administration (FMCSA) initiative to improve the effectiveness of FMCSA's compliance and enforcement programs. Its ultimate goal is to achieve a greater reduction in large truck and bus crashes, injuries, and fatalities, while making efficient use of the resources of FMCSA and its state partners.

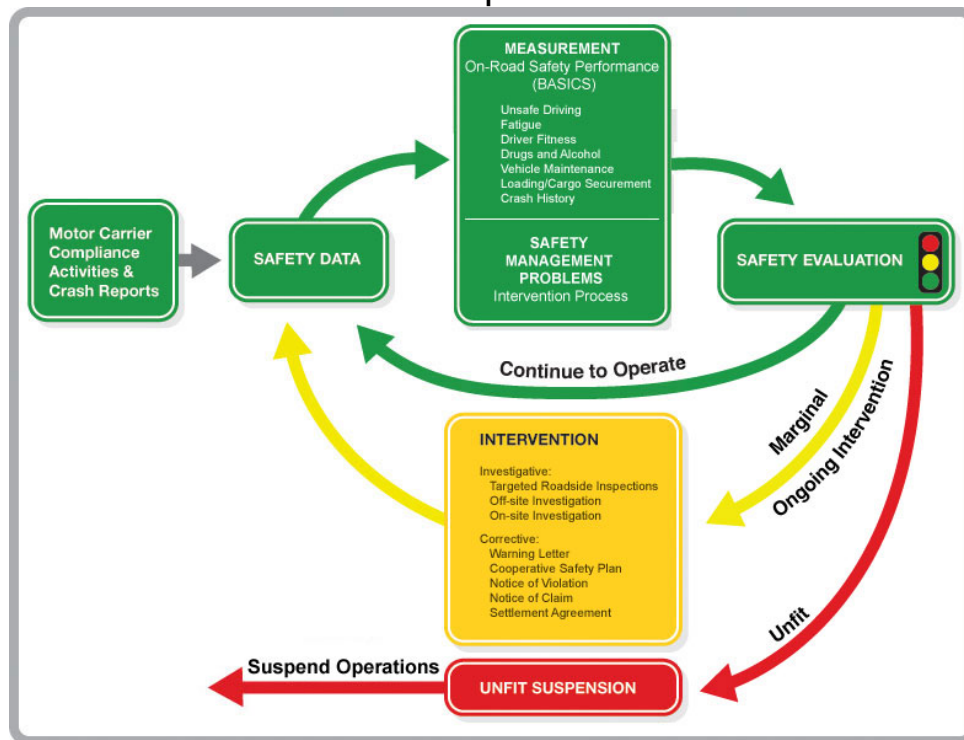
2. Why is CSA 2010 being implemented?

CSA 2010 is being implemented to better use FMCSA resources to identify drivers and motor carriers that pose safety problems and to intervene to address those problems as soon as they become apparent. FMCSA believes that CSA 2010 will help the Agency assess the safety performance of a greater segment of the industry and intervene with more carriers to change unsafe behavior early.

3. What is the Operational Model?

The operational model is the new way FMCSA and its state partners will carry out the compliance and enforcement programs. In contrast to the Agency's previous operational model, CSA 2010 is characterized by (1) a more comprehensive measurement system, (2) a safety fitness determination methodology that is based on performance data and not necessarily tied to an on-site compliance review, and (3) a broader array of progressive interventions. The illustration below demonstrates how the major components of CSA 2010 will work together.

The CSA 2010 Operational Model



4. What are the BASICs and how are they used in CSA 2010?

The Behavioral Analysis and Safety Improvement Categories, or BASICs, are seven categories of data available through the Motor Carrier Management Information System (MCMIS). These represent behavior categories that can lead to crashes: unsafe driving, fatigued driving, driver fitness, controlled substances and alcohol, vehicle maintenance, improper loading/cargo securement, and crash history. These data are weighted differently based on crash causation, but are all part of the CSA 2010 Operational Model's Safety Measurement System (SMS), and are collected from on-road safety performance activities including roadside inspections, traffic enforcement, the intervention process, and crashes.

5. Will CSA 2010 take into account both carrier and driver safety performance?

Yes, both driver and carrier safety performance will be monitored. FMCSA has designed two Safety Measurement Systems – one for carriers, the Carrier Safety Measurement System (CSMS) and one for drivers, the Driver Safety Measurement System (DSMS). Both systems are in the prototype stage and are being used to support the Operational Model Test (see FAQ #10).

6. What's the difference between SafeStat and the new Safety Measurement System?

There are six important differences between the new Safety Measurement System (SMS) and the Agency's current measurement system, SafeStat:

- 1) SMS is organized by seven specific behaviors (BASICs) while SafeStat is organized into four general Safety Evaluation Areas (SEAs).
- 2) SMS identifies safety problems in the same structure in which CSA 2010 addresses those problems, while SafeStat prioritizes carriers for a compliance review.
- 3) SMS uses all safety-based inspection violations while SafeStat uses only out-of-service violations and selected moving violations.
- 4) SMS uses risk-based violation weightings while SafeStat does not.
- 5) SMS impacts the safety fitness determination of an entity while SafeStat has no impact on an entity's safety fitness rating.
- 6) SMS assesses individual drivers and carriers, while SafeStat assesses only carriers.

7. When does a carrier intervention take place?

Carrier interventions are designed to be progressive, increasing in severity and interaction with motor carriers and their drivers. The goal is to use the interventions to reach a larger segment of the motor carrier industry. The intervention process is triggered by: (1) one or more deficient BASICs, (2) a high crash indicator, or (3) a complaint or fatal crash. Intervention selection is influenced by (1) safety performance, (2) hazardous material or passenger carrier status, and (3) intervention history.

8. What are the carrier interventions?

Carrier interventions (listed in increasing severity) are as follows: (1) warning letter, (2) targeted roadside inspection, (3) off-site investigation, (4) on-site investigation-focused, (5) cooperative safety plan, (6) notice of violation, (7) on-site investigation-comprehensive, (8) notice of claim/settlement agreement, and (9) unfit-suspension.

9. What is different between a Compliance Review and CSA 2010 Interventions?

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

- 1) CRs are generally deployed at a carrier's place of business as a one-size-fits-all tool to address what may not be a comprehensive safety problem, while interventions under CSA 2010 may not be at a carrier's place of business and can be focused on a specific deficiency.
- 2) The outcome of a CR can be the citing of acute and critical violations, while the outcome of an intervention determines the root cause of the safety problem and provides guidance on corrective actions.
- 3) A CR determines a carrier's safety rating, while CSA 2010 interventions will ultimately combine violations with on-road safety performance for safety fitness determination.
- 4) The focus on a CR is compliance while interventions are focused on compliance, improving behaviors that are linked to crashes, and identifying causal factors.
- 5) CRs are time consuming and result in reaching fewer carriers, while interventions efficiently address safety problems and help reach more carriers, earlier in the process.

10. What is the Operational Model Test?

FMCSA began to field test the new CSA 2010 Operational Model in February 2008. During this test, a representative sample of interstate motor carriers within the states of Georgia, Missouri, New Jersey, and Colorado are subject to the new safety measurement system and progressive interventions. These are designed to pinpoint a motor carrier's poor safety performance with significant emphasis placed on data that is gathered at roadside.

The Operational Model Test will not provide any regulatory relief. Motor carriers will not be rated during the test because the new safety fitness methodology (SFD) must be implemented through rulemaking, which will begin during 2008. In advance of this rulemaking, a motor carrier in the test that is found to have poor safety performance, and to be unresponsive to the new CSA 2010 interventions, will undergo a compliance review and be rated in accordance with FMCSA's current compliance and enforcement process.

During the test, FMCSA will determine the effectiveness of the new operational model; both in safety impact and its effect on state and federal resources. The test will continue for 30 months into mid-2010.

11. How are carriers selected for the Operational Model Test?

Only carriers domiciled in the four test states are involved in the test. After exclusions were made (e.g., recent compliance review), carriers were assigned **randomly** to test and control groups, in order to ensure a valid comparison. The test group will receive CSA 2010 interventions if a BASIC (see FAQ #4) fails while the control group carriers will be subject to the current process.

12. Who is not included in the Operational Model Test?

Carriers with a compliance review within the past 18 months are excluded from the Operational Model Test. Also, SafeStat category A/B carriers are excluded during Phase 1 of the test. However, category A/B carriers may be included in Phase 2 of the test in order to evaluate how A/B carriers respond to the new interventions.

13. How will a carrier know if it is in the test or control group?

Most carriers which are in the test group and performing without a failed BASIC will not know it because their BASIC performance will be better than the intervention threshold. However, those carriers whose BASICs are deficient in some manner will know they are in the test when they receive a warning letter and/or other new CSA 2010 intervention. Those carriers in the control group will continue under the FMCSA current operating model.

14. What is the proposed approach for Safety Fitness Determination (SFD) and why is it not part of the Operational Model Test?

The proposed CSA 2010 SFD is not part of the Operational Model Test as it will require a major rulemaking effort.

There are four important differences between FMCSA's current SFD and the planned CSA 2010 SFD:

- 1) The current SFD can only be issued or changed with an on-site compliance review (CR) while the CSA 2010 SFD would not exclusively be tied to on-site CRs.
- 2) The current SFD is a snapshot of compliance on the date of the CR while the CSA 2010 SFD would be updated regularly.
- 3) The current SFD is based solely on critical and acute violations while the CSA 2010 SFD would be based on violations of all regulations.
- 4) The current SFD safety rating "labels" are Unsatisfactory, Conditional, and Satisfactory, while the CSA 2010 labels under consideration are Unfit, Marginal and Continue Operation to designate safety fitness.

15. If there is no Safety Fitness Determination (SFD) in the Operational Model Test, how are bad carriers removed from service?

Current regulations base the SFD on a compliance review. If the performance of a carrier in the test group is poor enough to warrant removal from service, that carrier will be removed from the test, and be subjected to a compliance review and appropriate enforcement action.

16. How is COMPASS related to CSA 2010?

Information technology (IT) is a major component of CSA 2010, and COMPASS is FMCSA's major IT modernization initiative. With respect to CSA 2010, COMPASS will track and update the safety performance data from regulated entities as they are received, link relevant data to the correct entity, validate the data, and provide the mechanisms for correcting data. COMPASS will also support the intervention process as FMCSA and its state partners gather safety performance data on motor carriers and drivers.

17. What happens after this first phase of the Operational Model Test?

During the first phase of the Operational Model Test, only three BASICs will be measured: Unsafe Driving, Fatigued Driving, and Vehicle Maintenance. In summer 2008, the second phase will add the remaining BASICs and the test will become fully operational in the four test states. The Operational Model Test is scheduled to run into mid-2010 at which time FMCSA is planning CSA 2010 implementation and rollout.

