The rollout of the Federal Motor Carrier Safety Administration’s (FMCSA) improved safety enforcement program, CSA – Compliance, Safety Accountability, began on December 12, 2010 with the launch of the new CSA Safety Measurement System (SMS). In response to the start-up of the new system, Deep South introduced its CSA BASICS material. To provide further assistance to clients, we are providing this helpful Q&A. It is an excellent tool for internal and external stakeholders to utilize since it addresses many of the issues and concerns currently related to the CSA program. Deep South’s loss control team will continue to monitor and update information as CSA implementation moves forward.

**Q. What does CSA stand for?**

A. During its development and testing, CSA 2010 stood for Comprehensive Safety Analysis 2010. Upon its deployment in December 2010, FMCSA renamed its new safety enforcement program to be, simply, CSA – Compliance, Safety, Accountability.

**Q. How do I know if CSA affects me?**

A. FMCSA’s regulations remained the same after CSA implementation in December 2010, though CSA does change how FMCSA prioritizes carriers for enforcement and how it enforces compliance. Generally CSA affects carriers subject to the Federal Motor Carrier Safety Regulations (FMCSR), carriers transporting passengers or cargo in interstate commerce, and carriers of hazardous materials in intrastate commerce, but may also include carriers whose State requires that they obtain a U.S. DOT number.

FMCSA has provided detailed answers to questions about the general applicability of the FMCSR at www.fmcsc.dot.gov/about/other/faq/faqs.aspx.

**Q. What is the CSA timeline?**

A. The CSA rollout began in December 2010 with the following activities:

- SafeStat was replaced by the SMS as the tool used by FMCSA/States to prioritize enforcement. SafeStat is no longer available.
- Roadside inspectors are using the SMS results to identify carriers for inspection.
- The SMS is available to the public, including shippers and insurance companies.

Beginning in early 2011, warning letters will be issued to carriers with Behavior Analysis and Safety Improvement Categories (BASICs) that exceed the FMCSA Intervention Threshold.

**Q. Where is the SMS available to the public and what can the public see?**

A. The SMS was made public December 12, 2010. A link to the public SMS is on the Analysis and Information (A&I) website at www.ai.fmcsc.dot.gov/sms. The public can view five of the SMS’s seven BASICs. The SMS’s Crash Indicator, like SafeStat’s Accident Safety Evaluation Area (SEA), is only visible to the carriers and to enforcement staff while the agency develops a long-term approach to determining crash accountability (see the FAQ below).

Deep South is committed to promoting safety and active risk management to protect our clients.
In addition, as a result of a transparent and systematic process of input, testing, feedback, and refinement, FMCSA has determined that the Cargo-Related BASIC, while a solid indicator of safety performance, needs further analysis and refinement prior to public release. Therefore, at present, the Cargo-Related BASIC is used by enforcement and is only visible to motor carriers.

**Q. How is crash accountability handled in SMS?**

A. The structure of the new SMS is such that crash accountability is not automatically determined or considered. In fact, recordable crash reports that States submit to FMCSA do not include an accountability determination. Consequently, motor carriers are identified for possible intervention based on recordable crashes without consideration of accountability.

• Why does FMCSA take this approach?
  This approach is taken because data analysis has historically shown that motor carriers that are involved in crashes, regardless of accountability, are likely to be involved in more future crashes than the carriers that are not. Put simply, past crashes are a good predictor of future crashes.

• Will this approach remain the same moving forward?
  FMCSA recognizes this approach as a concern and is considering several short- and long-term ways to address it

  o The short-term: The plan is to exclude the Crash Indicator BASIC percentile ranking from public websites because FMCSA understands that some crashes are unpreventable on the part of the motor carrier. This is consistent with the agency’s decision not to display the Accident SEA of SafeStat on public websites in recent years.

  o The long-term: FMCSA is assessing the feasibility of evaluating crashes for accountability/preventability before they are used by the SMS in the Crash Indicator BASIC. This would allow FMCSA to better concentrate intervention efforts on motor carriers that have high preventable/accountable crash rates.

In the meantime, FMCSA will continue to consider crash preventability prior to issuing adverse formal safety ratings.

**Q. When does the SMS update?**

A. The SMS updates monthly. A snapshot of the data is taken on the 4th Friday of each month and then it takes approximately 10 business days to process and validate the data before it is updated on the website. These dates are estimates; if there are problems with the validation, the process can take longer than expected. The release schedule is listed here: http://ai.fmcsa.dot.gov/SMS/InfoCenter/#question5

**Q. How are safety ratings handled under CSA?**

A. FMCSA intends to propose replacing the current safety rating process, which determines safety via a compliance
review with a new Safety Fitness Determination (SFD) that will use the SMS to determine safety ratings. The SFD Notice of Proposed Rulemaking will be released in 2011. The SFD will need to go through the entire rulemaking process before it becomes law. Until the SFD becomes law, FMCSA will continue to use the current safety rating process. Current safety ratings can be found here: http://www.safer.fmcsa.dot.gov/CompanySnapshot.aspx

**Q: How do I assess my BASIC percentile rank?**

A: If one or more of your BASIC percentiles exceed the intervention threshold or prior serious violations have been found, then FMCSA will be closely monitoring your organization. Motor carrier interventions are selected by weighing the following factors: the SMS percentile rankings including number of BASICs that exceed the threshold, intervention history, and time since last intervention. The intervention thresholds for carriers are organized by BASIC and are as follows:

<table>
<thead>
<tr>
<th>Basic</th>
<th>Intervention Thresholds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unsafe Driving, Fatigued Driving (Hours-of-Service), Crash Indicator</td>
<td>Passenger: 50%</td>
</tr>
<tr>
<td></td>
<td>HM: 60%</td>
</tr>
<tr>
<td></td>
<td>Other: 65%</td>
</tr>
<tr>
<td>Driver Fitness, Controlled Substances/Alcohol, Vehicle Maintenance,</td>
<td>Passenger: 65%</td>
</tr>
<tr>
<td>Cargo-Related</td>
<td>HM: 75%</td>
</tr>
<tr>
<td></td>
<td>Other: 80%</td>
</tr>
</tbody>
</table>

**Q: How do I find my non-public data?**

A: In order to view your company’s data, please go to the following site: http://ai.fmcsa.dot.gov/sms/. From this page, a carrier representative can log in with its US DOT Number and PIN number in order to access the carrier’s non public data. The non public data includes percentile ranks for the Cargo-Related and Crash Indicator BASICs and identifies which drivers were responsible for each inspection. The carrier sign-in is at the bottom center of the screen. Once signed in, you will be guided back to the SMS Home Page. After that, in the search box in the middle right section of the screen, you should type in the USDOT# or MC # and hit search. A carrier representative can also sign in via the Portal located here: https://portal.fmcsa.dot.gov/.

**Q: How do I find my Inspection Selection System (ISS) value?**

A: ISS is no longer available to the public. A carrier can access its own ISS value on the Compass Portal (https://portal.fmcsa.dot.gov) and can register on the website using its DOT Number and USDOT PIN Number. For answers to questions about the Portal, contact compass@dot.gov or call 1-800-832-5660.

**Q: How can I make a suggestion to improve the new SMS website?**

A: The SMS website will be adding new functionality over time. Stakeholders can submit suggestions on how they would like to see the SMS website improved by submitting their feedback here: http://csa.fmcsa.dot.gov/csa_feedback.aspx?defaulttag=SMS.
Q: **How do I improve my percentile ranks in the SMS BASICs?**

A: Receiving new inspections that are free of violations will improve a carrier’s percentile rank for Fatigued (Hours-Of-Service) Driving, Driver Fitness, Controlled Substance and Alcohol, Vehicle Maintenance, and Cargo-Related BASICs. Carriers should also review the “What a Motor Carrier can do to Improve” section of the information center located here: http://ai.fmcsa.dot.gov/SMS/InfoCenter/Default.aspx. This section provides tips that may help carriers who want to improve their safety performance.

Q: **How can one of my BASICs move into alert status?**

A: There are two ways a motor carrier can receive an alert in a BASIC. First, the SMS analyzes a carrier’s on-road safety performance based on the new SMS methodology and that analysis results in a percentile for each BASIC. If the percentile is over the established intervention threshold, the BASIC is at alert and the percentile is presented within an orange outline and displayed in the On-Road column of the SMS.

Second, if a serious violation was cited as the result of a carrier investigation within the past 12 months, the BASIC is at alert and the Investigation column displays the “Serious Violation Found” icon. The alert icon will remain present for 12 months regardless of whether corrective actions have occurred.

Disclaimer: It is the sole purpose of this Deep South document to be used as a tool to convey educational information. The document does not suggest that it will ensure compliance with local, state, or federal regulations.