



# Top 5 tips for succeeding under CSA from the person who led its startup

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The government's new program for measuring the safety performance of truck and bus companies -- the Compliance, Safety, Accountability (CSA) initiative -- is the most significant change in decades in the way the DOT and states oversee transportation safety.

A little later in this article, I will provide key tips for companies to succeed under this new approach from my perspective of having overseen the design and implementation of CSA while I was Chief Safety Officer of the Federal Motor Carrier Safety Administration. But first, some background about CSA.

Simply put, CSA allows the government to see a much broader safety picture of a motor carrier and its drivers. By analyzing a company's inspection and crash information more thoroughly, government overseers can probe deeper into the safety performance of companies and measure them on a broader set of risk factors.

Companies that don't bother to understand CSA or adopt a mind set of "catch me if you can" risk enforcement actions and/or losing business to their more safety compliant competitors.

## The purpose of CSA

The intent of CSA is simple:

- Establish a robust governmental monitoring system that encourages safe practices by motor carriers
- Intervene against the ones that perform poorly and monitor corrective actions
- Allow members of the public to examine a carrier's safety posture so they can make an informed transportation choice
- Encourage the industry to recognize that safety is, in fact, a wise business investment



Being vigilant about the CSA program and a company's safety practices will allow businesses to attract and retain customers, reassure insurers and protect the safety of the traveling public.

Hopefully by now, motor carriers have gotten serious about CSA and reviewed their performance information. Thirteen months ago, when carriers were first able to see the new measurement system and their own scores (a full eight months before public access), fewer than 5% checked their record. No doubt many simply believed CSA would never be implemented. Now, for many late to the game, they are seeing that being complacent or uninformed is a problem and now it's "catch up" time.

## **Guideposts for success**

Here are five tips for organizations that want to succeed with CSA:

- 1. Make safety a core, non-negotiable value of your company.**

This doesn't mean merely posting a sign in the workplace that "safety is important in our company." It is communicated by the way the company is managed, the behavior and attitude of company officials and the actions management takes when a safety violation occurs. Research confirms that companies that make safety a corporate commitment have lower operating costs, since crash and injury rates are fewer.

- 2. Get educated on CSA and explain it clearly to your employees.**

Ensure that drivers, maintenance shop staff, trainers, executives, etc. understand CSA and its impact on the company's bottom line and how each of them contribute to the scores earned by the company.

For example, drivers who diligently perform the required pre- and post-trip inspections can identify safety deficiencies that, if left uncorrected, could result in violations during a roadside inspection. Because now ALL maintenance items are measured in the CSA program, and not just out-of-service ones, all vehicle maintenance deficiencies will count toward CSA scores. In the past, it may have been tempting for the maintenance shop to defer a vehicle maintenance matter because the problem was considered "not serious" enough.



Another best practice: people making hiring decisions should be sure to review a driver's background by using the government's new Pre-employment Screening Program to ensure they hire safety conscious drivers. CSA Awareness training would be useful in ensuring that all motor carrier staff understand their role in how the company's safety is measured

**3. Examine the data maintained by the government that underpin your CSA scores and ensure the data is accurate.**

Aggressively pursue data correction through the DOT DataQ's process and get your record correct. Ensure your registration data (MCS-150) information is updated.

Again, inspection and crash reports are the key data sources that produce a company's CSA numbers. It is vital, then, to ensure that the data ascribed to you is accurate. Set up a procedure for company officials to review these reports, involve the drivers and stress to them the importance of reviewing the inspection report or other issuing documents to ensure the DOT number and CDL numbers are correctly recorded (long numbers can be incorrectly filled in).

Become familiar with the process for challenging inaccurate information and promptly appeal for correction. Having an up-to-date MCS-150 filing will ensure your company is placed in the correct peer group – another critical part of the measurement process the government uses to measure your company's safety performance against other carriers with similar operating characteristics.

**4. Implement specific, competent countermeasures to address your safety deficiencies.**

If any of your measures exceed the "alert" threshold, put into place known effective measures that correct the reasons your company is receiving violations.

Until your on-the-road performance improves, your score in any one measure may continue to degrade. The good news is that you can influence your scores by getting "clean," no-violation inspections and by addressing the causes behind crashes. There are many sources of best practices available on the Internet.



Better yet, have a safety audit or review conducted of the root causes for your safety performance.

Rear-end collisions, for example, are a leading cause of truck- and bus-involved accidents. In these cases, the driver may not have recognized the situation either because of not paying attention to the traffic conditions down the road, driving too fast for conditions, or making false assumptions about how the vehicles in front would act.

By analyzing the nature of crashes, identifying crash patterns by driver or by condition, a company can deal with these outcomes by fitting the remedy to the problem.

#### **5. Recruit, train and vigorously monitor drivers.**

Driver performance is a backbone of the CSA system since violations in the three driver categories (Unsafe Driving, Fatigued Driving and Crash History) are given added emphasis in the measurement calculations.

This focus is consistently borne out by research that concludes that driver errors and poor driving decisions are the major cause of crashes.

I have often heard company officials complain that if they raise driver standards, they will lose seasoned drivers and have difficulty filling their vacancies. In truth, poor performing drivers are far more likely to jeopardize a company's business since their driving records may degrade the company's CSA scores. That could potentially affect its insurance premiums (or even cause its insurance carrier to drop coverage altogether), and risk the loss of customers since their own liability is increased if they choose to hire a carrier whose CSA record is poor.

Of all the decisions a carrier makes, none are as important as insisting on finding and retaining safe drivers. This means that doing competent pre-employment checks and drug and alcohol testing and adequately preparing a driver for his/her assignments. Insurers say that the first six months of a driver's employment with a carrier is the highest risk period, regardless of whether the driver is a rookie or has 25 years of driving experience. Good companies recognize and plan for this through training and monitoring. Even better companies have an ongoing



program for analyzing all their drivers' activities and taking action to minimize risk.

After seven years of planning and implementing the first major piece of the CSA system -- measurement, evaluation and intervention -- the government is expecting the motor carrier industry to operate safely and be accountable for results. With close attention to their scores and best practices, companies can succeed.

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