

CSA 101

Compliance, Safety, Accountability (CSA) is a Federal Motor Carrier Safety Administration (FMCSA) program designed to improve large truck and bus safety and ultimately reduce crashes, injuries, and fatalities.¹ It is an enforcement and compliance tool that FMCSA and its State Partners utilize to help address safety problems before a crash. Since the original roll out of CSA in December 2010, FMCSA has initiated several changes to program in attempt to improve its effectiveness. However, the core components of CSA continue to be the Carrier Safety Measurement System, the intervention process, and the Safety Fitness determination system.

1. *Safety Measurement System.* SMS uses data obtained from federal or state roadside inspections and from crash investigations to identify the highest risk carriers. SMS was designed to improve on SafeStat by incorporating all of the safety-related violations recorded during roadside inspections. Carriers potentially receive an SMS score in seven categories based on this information.
2. *Intervention.* A set of enforcement tools, such as warning letters, additional investigations, or fines are used to encourage the highest risk carriers to correct safety deficiencies, or place carriers out-of- service.
3. *Safety Fitness Determination Rule.* Currently there is no such rule. Nonetheless, this future rulemaking is thought to amend regulations to allow a determination—based in part on some of the same information used to calculate SMS—as to whether a motor carrier is fit to operate on the nation’s roads.²

FMCSA evaluates the safety performance of motor carriers by applying data from roadside inspections and crash investigations across seven Behavior Analysis and Safety Improvement Categories (BASICs). Each of the over 800 violations associated with CSA have been attributed a severity rating based on their supposed link to crash risk. Carriers are ultimately ranked alongside their “peers” or “event groups” and are measured by their total number of inspections in a given period. Those carriers that exceed certain percentile thresholds in their event group are subject to intervention, which can include warning letters and follow-up inspections. In addition, violations of sufficient severity can result in a truck or driver being placed out-of-service until the carrier corrects the violation.

FMCSA has arranged the following seven BASICs in order of their correlation to crash risk, from highest to lowest.

¹ <http://csa.fmcsa.dot.gov/about/>

² *Federal Motor Carrier Safety: Modifying the Compliance, Safety, Accountability Program Would Improve the Ability to Identify High Risk Carriers*, U.S. Government Accountability Office (2014) pg. 6.

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CSA BASICS³

Category	Description
Unsafe Driving	Speeding, reckless driving, improper lane change, inattention, no seatbelts
Crash Indicator	Histories of crash involvement (Not Public)
Hours-of-Service Compliance	Noncompliance with HOS regulations, including logbooks
Vehicle Maintenance	Brakes, lights, defects, failure to make required repairs
Controlled Substances/Alcohol	Use/possession of controlled substances/alcohol
Hazardous Materials Compliance	Leaking containers, improper packaging and/or placarding (Not Public)
Driver Fitness	Invalid license, medically unfit to operate a CMV

Concerns with CSA

A number of associations and organizations including the American Trucking Association, Wells Fargo Securities, the Government Accountability Office (GAO), and the Owner-Operator Independent Drivers Association Foundation, have raised numerous concerns with the methodology and practicality of the CSA program.

- In 2014, GAO released a report in which they found that out of 750 examined violations, only 13 had some association with crash risk in at least half the tests that they performed. Furthermore, just two violations had sufficient data to consistently establish a substantial and statistically reliable relationship with crash risk across all tests.⁴
- Dr. James Gimpel from the University of Maryland highlighted a number of concerns including an underrepresentation of small carriers, which represent a vast majority of the trucking industry (93% of the industry operates 6 trucks or less, while less than 2% of carriers operate 25 or more trucks). In 2012, only 18.5% of all motor carriers that had a SMS CSA score in at least one BASIC or crash information were one-truck carriers, which represent 56% of the industry. In other words, because small carriers do not receive adequate number of inspections, there is not enough data to generate reliable safety performance scores.
- GAO also demonstrated that carriers with one or two trucks were subject to fewer inspections. Therefore, many of the SMS scores for these carriers are likely to be imprecise, stating, "Carriers with few inspections or vehicles will potentially have estimated violation rates that are artificially high or low and thus not sufficiently precise for comparison across carriers."
- However, SMS scores are calculated by ranking carriers in relation to one another. Thus, imprecise rate estimates for some carriers creates the likelihood that many SMS scores do not represent an accurate or precise safety assessment for a carrier.
- A fundamental flaw in the CSA methodology is that in order to receive a SMS CSA score, a motor carrier must first incur violations. Clean inspections, meaning those that are without violations, are not entered into the SMS database until a carrier first receives a violation.

³ https://csa.fmcsa.dot.gov/Documents/What_is_CSA_Factsheet_GRS_P_Final_508.pdf

⁴ *Federal Motor Carrier Safety*, pg. 15.

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