



CSA Overhaul Under Way



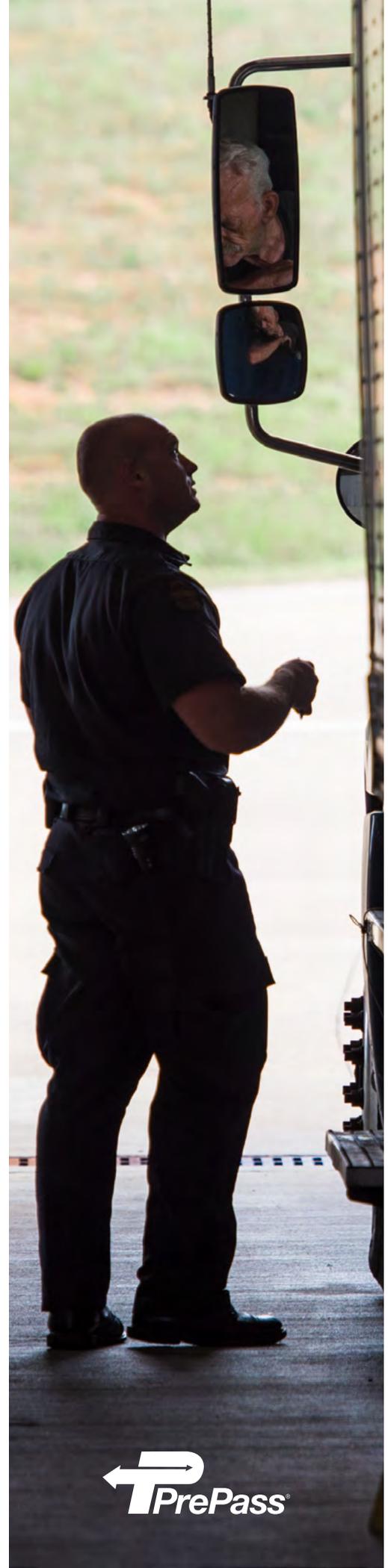
PrePass Safety Alliance's first [PrePass "Eyes on the Road" podcast](#) reviewed the Federal Motor Carrier Safety Administration (FMCSA) programs that aim to prevent crashes by identifying those motor carriers and drivers which may need attention from enforcement. There, listeners learned about government acronyms CSA (Compliance, Safety and Accountability), SMS (Safety Measurement System), ISS (Inspection Selection System), and BASICs (Behavioral Analysis and Safety Improvement Categories), and the steps operators could take to improve their safety scores.

In that podcast we also touched on what was coming down the road following a study of the CSA program by the National Academy of Sciences (NAS) -- including a new acronym, IRT, shorthand for Item Response Theory. Well, the future is here. FMCSA recently announced its roadmap in response to the NAS study. The CSA overhaul has begun. Let's review why this happened, what FMCSA will do next, how it affects drivers and operators and how you can, and should, participate.

Why this happened.

While most industry and enforcement experts agreed with the goals and intentions of CSA, its weaknesses also caused great concern:

- *Not enough carriers had data in the CSA system, which only served to highlight those who did.*
- *Data on fleet mileages and crashes themselves were incomplete.*
- *Non-preventable accidents were included in calculating a fleet's safety risk.*
- *Not every BASIC proved to be a good predictor of future crash risk.*
- *Differences in state enforcement priorities, as well as where carriers operated, could skew scores.*
- *Motor carrier safety scores and much of the CSA data were made public. Peer and societal pressure can perhaps incentivize safety, but CSA system weaknesses also led to inaccurate conclusions and misuse by shippers, trial lawyers and others.*



To be fair, FMCSA and its state partners faced a herculean task given the immense breadth and diversity of the trucking industry. CSA is an improvement over past FMCSA efforts to identify unsafe carriers and includes “intervention” steps, such as warnings and letters, more targeted than the complete carrier audit or compliance review upon which the agency had previously relied. CSA allowed FMCSA to touch more fleets, a goal directed by Congress which led to CSA’s creation.

In December 2015 Congress passed the Fixing America’s Surface Transportation Act (FAST Act). In response to the CSA weaknesses, the FAST Act mandated a full review of the program by the Inspector General of the U.S. Department of Transportation and by the National Academy of Sciences, and required an FMCSA response.



What FMCSA will do next.

FMCSA has posted its response to the NAS study, labeled a **“Correlation Study Corrective Action Plan.”** The agency has also withdrawn CSA changes in the works since 2015 (prior to the NAS findings) and shifted its focus to the six NAS recommendations. In summary, FMCSA will:

1. Develop and test an IRT model to replace the SMS. The agency hopes to begin “small scale” testing of an IRT model this September, with April 2019 targeted for full scale testing.

Item Response Theory requires greater data input – FMCSA will investigate obtaining data on driver turnover rate, type of cargo, method and level of driver compensation, and determine whether those factors influence the IRT calculation of safety risk.

2. Item Response Theory, already used in healthcare and educational testing, was deemed by the NAS as more capable of dealing with the variables in safety scoring than SMS. IRT, however, requires greater data input. FMCSA will investigate obtaining data on driver turnover rate, type of cargo, method and level of driver compensation, and determine whether those factors influence the IRT calculation of safety risk.

3. FMCSA will specifically target better data on fleet mileage (exposure) and improvements in the completeness and timeliness of crash reporting. For example, FMCSA currently only collects carrier mileage data every two years. The agency will discuss the sharing of mileage data with the International Registration Plan (IRP) and the International Fuel Tax Agreement (IFTA) organizations, and may consider incentives

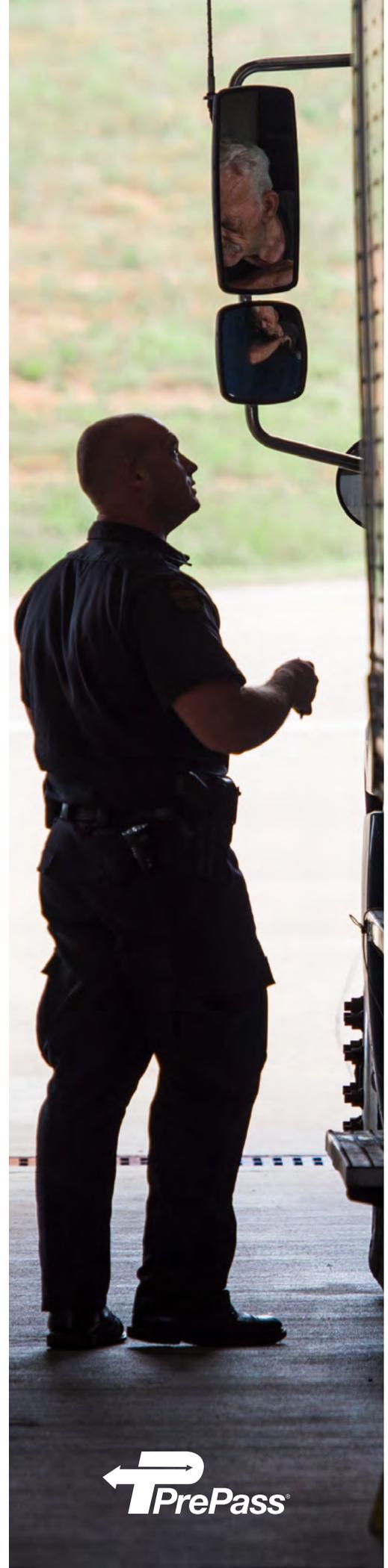
for voluntary updates by fleets. On the crash reporting side, FMCSA will partner with NHTSA (National Highway Traffic Safety Administration) to urge more state participation in uniform crash reporting standards.

The agency will develop a webpage where the public can obtain data snapshots without any personally identifiable information.

4. FMCSA will take down the public SMS website during this process. In its place, the agency will develop a user-friendly webpage where researchers, carriers, safety consultants, and the public can obtain simplified MCMIS (Motor Carrier Management Information System) data snapshots without any personally identifiable information.

5. In addition to revising what data the public can see, FMCSA will study whether the percentile rankings of carriers and public access to carrier scores contribute to improved safety.

6. FMCSA will examine whether absolute measures of safety – as compared to the current use of percentile comparisons of similar fleets in each BASIC– should trigger alerts and enforcement interventions.



How you can participate.

Much of the IRT development work is dauntingly technical, so FMCSA will rely on an NAS standing committee that includes subject matter experts on organization safety, statistics, research and evaluation methods, motor carrier operations, enforcement, and IRT modeling. Their recommendations, in turn, will be shared with the Motor Carrier Safety Advisory Committee (MCSAC), a broad-based group that already advises FMCSA, to provide guidance for next steps.



Here is where you can directly participate:

- *Key decision points will be published in public dockets, such as the **Federal Register**, with the opportunity for you to comment. In particular, FMCSA will look for feedback on how difficult or costly it may be for fleets and drivers to provide the enhanced data required by IRT, and whether some data should be withheld as proprietary.*
- *Meanwhile, FMCSA still operates the **Crash Preventability Demonstration Program**, where fleets and drivers can submit evidence that crashes were non-preventable and help FMCSA determine whether non-preventable crashes should be considered at all in safety risk calculations.*
- *Finally, each of the steps on improving your safety score outlined in the **first PrePass podcast** remain relevant; only the scoring process is changing. The best response to CSA, IRT or any government acronym now or in the future is simple. Be safe.*

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