**MCSAC Task 12-03: Evaluation of and Recommendations on the Compliance, Safety, Accountability (CSA) Program**

**CSA Subcommittee Meeting, June 18, 2013**

**Topics for Recommendations Not Considered**

1. **Address BASICs that are not well correlated to future crash risk**
	1. Driver Fitness BASIC (Behavior Analysis & Safety Improvement Category) – consider weighting?
	2. Look at BASICs that are inverted (i.e., inversely correlated to crashes) and determine their applicability or relevance.
	3. Rebecca M. Brewster, President and Chief Operating Officer, American Transportation Research Institute (ATRI): ATRI concluded that the Safety Measurement System (SMS) methodology for determining percentile scores is not calibrated correctly for the Controlled Substances and Alcohol or Driver Fitness BASICs.
		1. ATRI concluded that it is likely that FMCSA’s severity weighting methodology places too much weight on safety-irrelevant violations and too little weight on safety-critical violations in these two BASICs.
	4. David Madsen, Volpe Center: Driver Fitness BASIC is negatively correlated with crash risk.
		1. This may occur due to the lack of specificity in certain violations within the Driver Fitness BASIC. For example:
			1. Missing medical card (most common violation in this BASIC)
				1. Could be misplaced – not safety related.
				2. Could be expired – may be safety related.
				3. Driver could be medically unqualified to drive – is safety related.
				4. Note: The National Registry rule and medical certification rule will reduce these types of violations.

FMCSA will be able to assess the impact of these violation reductions on suspended license weighting.

* + - 1. Operating while suspended (no reason specified for this violation)
				1. Sometimes commercial driver’s license (CDL) suspension occurs because of non-safety-related reasons such as unpaid child support.
		1. SMS should be able to emphasize violations for safety-related reasons but because those reasons are not specified the SMS model assigns a lower weight to that violation within the BASIC.
	1. For BASICs that are least correlated to future crash risk (e.g., Driver Fitness, Drug and Alcohol), the subcommittee should look at SMS violation weightings within the BASIC and their correlations to safety.
		1. This could include a discussion of the weight, how they actually work, impacts, and possible scenarios.
		2. Are the weightings appropriate to emphasize safety violations as oppose to compliance?
1. **Update on FMCSA SMS Crash Weighting Study**
2. **Data Outliers**
	1. Data outliers should be addressed (i.e., carriers with relatively high non-crash BASIC scores, but very low Crash Indicator BASIC scores).
	2. Outliers (i.e., carriers with a low crash rate, but that are deficient in one BASIC): How many of those outliers are out there?
		1. Madsen (Volpe Center) was unable to answer this question, but did explain that SMS tries to screen out carriers reporting a very large fleet, but no violations (assume those fleets are not operating very much).
		2. SMS also screens out leasing companies (e.g., Penske).
	3. Daniel Blower, University of Michigan Transportation Research Institute: It is worthwhile to look at outliers, but outliers should not drive the CSA program.
		1. Outliers problem also go both ways – some carriers are involved in unsafe driving and yet do not have crashes. This results from the variability and random component of crashes.
	4. Some members expressed concern that the BASIC scores of carriers that have relatively high non-crash BASIC scores, but very low Crash Indicator BASIC scores (i.e., “data outliers”) can negatively impact the public’s perception of a carrier.
		1. Could these types of carriers “unlock” their Crash Indicator BASIC score for viewing on SMS online?
	5. Do “data outlier” carriers exist for reasons beyond statistical variation?
		1. For example, an outlier carrier that has high violations but no crashes might be very good at hiring good drivers, or they may be getting rid of those drivers that have violations before they have crashes.
		2. Are there practices or qualities that these “data outlier” carriers (with low Crash Indicator score) have in common that result in a lower Crash Indicator BASIC score?
3. **What are the best practices of carriers that have low rates of DOT-reportable crashes?**
	1. See previous MCSAC Task 07-02 Report on Commercial Motor Vehicle Non-Regulatory Best Practices: <http://mcsac.fmcsa.dot.gov/documents/FinalReportTask07-02.pdf>
4. **Recommendation to change the name of Vehicle Maintenance BASIC to “Vehicle Maintenance and Cargo Securement”**
	1. Some subcommittee members expressed concern that cargo securement is not a BASIC anymore. The concern is that those violations were moved to make another BASIC “look better,” but the effect is dilution of emphasis on the importance of cargo securement.
	2. In which BASIC should cargo securement violations appear? (Currently, cargo securement violations are in the Vehicle Maintenance BASIC.)
5. **There should be a Fatigue BASIC (in addition to and separate from the Hours of Service BASIC)**
	1. Rationale: The public should be made aware of carriers that send fatigued drivers on the road.
	2. How could this be identified at the roadside inspection?
	3. Beyond hours of service violations, what would be included in a Fatigue BASIC?
	4. Briefing on North American Fatigue Management Project.
6. **Distinguish between motorcoaches and property carriers**
	1. No one has examined passenger carrier violation/crash data alone.
	2. There is not as much data on passenger carriers (not as many inspections).
		1. Any data that exists on a motorcoach inspection is more likely to include Driver Fitness, Driver Qualification, and Unsafe Driving violations because roadside inspections are more likely to be Level III (rather than Level I) inspections.
	3. There are also fewer passenger carrier companies, so the data that exists may not be sufficient to provide a relevant rank.
	4. Supina (DATTCO Inc.): Many States do not require inspections (only 6 States perform Level V inspections for motorcoaches). SMS studies should look at motorcoaches.
	5. FMCSA should mandate a State-level motorcoach inspection program as part of a condition on receiving MCSAP funds.
	6. The characteristic of the Crash Indicator BASIC that a crash which involves an injury or a fatality is weighed more than a crash without an injury or fatality (i.e., it counts as two crashes). Some subcommittee members expressed concern that this is inequitable for motorcoach carriers.
7. **Study the correlation between driver wages and methodology, as well as working conditions and safety**
8. **How insurance companies (Defense) and litigators (Plaintiffs or Prosecutors) evaluate risk**
9. **Update on the adjudicated data process**
10. **Driver Accountability in SMS**