

# Top Ten Reasons to Train for Trucking Under CSA

by Sean D. Shields

In December, the Federal Motor Carrier Safety Administration (FMCSA) put into effect its Compliance, Safety and Accountability (CSA) program (formerly referred to as Comprehensive Safety Analysis or CSA 2010). This new standard governing commercial motor vehicles (CMVs) significantly changes the way carriers and their drivers are held accountable for operational and equipment-related safety infractions. During roadside inspections and on incident reports, a driver's and company's performance will be evaluated based on seven categories: unsafe driving, fatigued driving, driver fitness, controlled substances/alcohol, vehicle maintenance, cargo, and crash indicators. We first reported on CSA in the March 2010 issue of **SBC** (see "Truck Drivers Targeted" at [sbcmag.info/1003\\_truck.pdf](http://sbcmag.info/1003_truck.pdf)).

Now that both carriers and their drivers are penalized for infractions under CSA, component manufacturers should consider implementing a formal driver training program. Here we summarize the top 10 reasons why having a training program for your drivers is a good idea under this new enforcement approach, given the impact it will have on shipping components. All of the information below, along with considerable more detail, is available on FMCSA's CSA website: [csa.fmcsa.dot.gov/FAQs.aspx](http://csa.fmcsa.dot.gov/FAQs.aspx).

1. Insurance companies are now beginning to look at the stipulations of CSA, and some have begun requiring their policy holders to offer formal driver training and management programs. If all the other reasons listed below are not enough to convince you to have a formal driver training program in place at your company, the money you could save on monthly premiums will more than cover the cost of implementing a training program.
2. According to FMCSA, all violations will be attributed to a carrier, and many can also be attributed to the driver. It may no longer be wise to incorporate ticket fines for minor infractions into the "cost of doing business." Each and every safety-related infraction carries a point value. Accumulating too many points will result in FMCSA intervention.
3. As part of its Safety Management System (SMS), cargo-related infractions, such as improper or inadequate load securement or load placement, carry some of the highest fines and point totals for carriers. As a carrier, you want to ensure your drivers fully inspect the location and orientation of their cargo, as well as the quantity and condition of the tie-downs used to secure the cargo, before they leave the production facility.
4. Equipment defects may cause a CMV to be placed "out-of-service," which carries the highest point violation against a carrier. Conducting a thorough pre-trip and post-trip inspection of their vehicle may be one of the most important duties a driver has.
5. At the conclusion of its Operational Model Test in June 2010, FMCSA temporarily suspended the overweight/oversize infractions portion of its SMS, so they will not carry point totals at this time. However, insufficient or inadequate wide-load or overweight permit infractions will still be cited and fined at the time of inspection.

6. Moving violations, such as speeding, improper lane changes or tailgating can be assessed against both the driver and the carrier. FMCSA has indicated it is developing a weighted system based on the severity of such violations (speeding more than 10 mph will carry more points than going 5-10 mph over the posted speed limit, for example). Carriers now have a more vested interest in ensuring their drivers obey all traffic laws.

7. FMCSA has indicated its SMS will track infractions charged to all of the CMVs owned by a particular company (since everything is attributed to a company's unique USDOT number) over the previous 24 months. As mentioned above, all safety infractions are attributed points based on their severity. All of those points are added together for a cumulative company score.

8. Even if a driver no longer works for the carrier, FMCSA has indicated that the point-weighted infractions earned by that driver will remain on the carrier's record during the 24-month period following each infraction. Addressing poor driver performance early will be of benefit to the carrier in the long run.

9. Currently, FMCSA will continue to judge carriers based on the safety rating methodology found in 49 CFR Part 385. However, FMCSA has indicated on its website it plans on initiating a rulemaking process to change the way in which carriers will be evaluated, and the way in which it will intercede if a carrier accumulates too many points. You can track this process at [csa.fmcsa.dot.gov](http://csa.fmcsa.dot.gov).

10. In past press releases and online webinars on its website, FMCSA suggested that once a carrier has accrued too many points, they face the danger of having their U.S. DOT number suspended or revoked. Currently, FMCSA is stressing intervention and collaboration with carriers deemed to be in noncompliance with CSA.

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Each infraction a carrier and a driver incur can cost money, it can lead to driver downtime, and/or it can lead to a CMV being placed out of service at an inopportune time. Under CSA, every component manufacturer who operates their own delivery fleet needs to formulate a plan to reduce their risk of earning infractions. Evaluate your situation and implement a formal training program, or you may soon find you are on a first-name basis with your local FMCSA compliance officer! **SBC**

For more information on how the SBCA TRUCK program's Basic Driver Training online course can help train drivers under these new regulations, contact Sean at 608/310-6728 or [sshields@qualtim.com](mailto:sshields@qualtim.com).



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