Keeping Score

Using your CSA score as a tool for management, compliance and accountability

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In an effort to hold motor carriers and drivers accountable for keeping our nation's roads safe, the Federal Motor Carrier Safety Administration (FMCSA) launched the Compliance Safety Accountability (CSA) program in 2010. It is essentially an enforcement prioritization tool; by identifying unsafe carriers, the FMCSA can prioritize them for enforcement intervention.

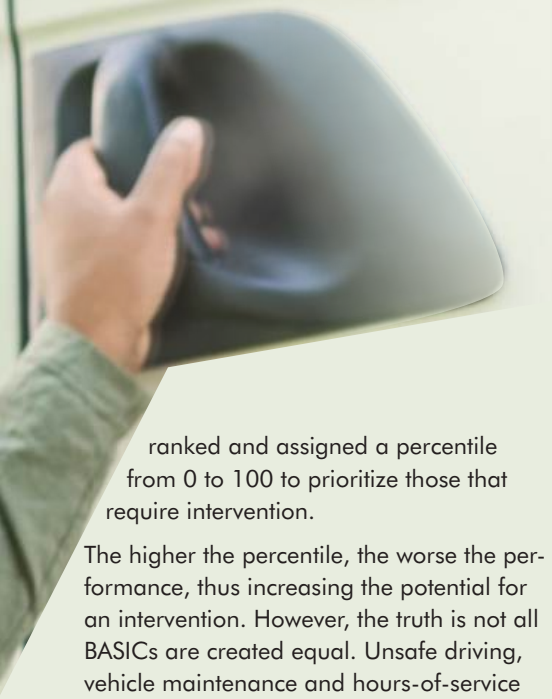
The centerpiece of the CSA program is the Safety Measurement System (SMS), which FMCSA updates once a month with data from roadside inspections, including driver and vehicle violations, crash reports from the last two years and investigation results. FMCSA organizes the SMS data into seven Behavior Analysis and Safety Improvement Categories (BASICs).

THE 7 BASICS ARE:

- UNSAFE DRIVING
- CRASH INDICATOR
- HOURS OF SERVICE COMPLIANCE
- VEHICLE MAINTENANCE
- CONTROLLED SUBSTANCES/ALCOHOL
- HAZARDOUS MATERIALS COMPLIANCE
- DRIVER FITNESS

In each BASIC, the SMS calculates a quantifiable measure of a motor carrier's performance.

Motor carriers are grouped in SMS by BASIC with other carriers that have a similar number of safety-related events and then



ranked and assigned a percentile from 0 to 100 to prioritize those that require intervention.

The higher the percentile, the worse the performance, thus increasing the potential for an intervention. However, the truth is not all BASICs are created equal. Unsafe driving, vehicle maintenance and hours-of-service compliance are weighted more heavily than the others.

"Those are the ones the FMCSA is currently keen on. Those are the ones that can get you into hot water," said P. Sean Garney, co-director of Scopelitis Transportation Consulting, while speaking on the topic of motor carrier compliance at the 2025 NSRMCA Las Vegas conference in January.

Keeping score

There are a lot of factors that can impact a carrier's CSA score. Violation severity ranks up there, but so does violation recency as well as violation category, with the aforementioned select three raising more red flags than others.

A carrier's BASIC measure — and thus, its CSA score — is calculated by dividing the total of time- and severity-weighted applicable violations by total time-weight of relevant inspections. The two exceptions to that formula are the unsafe driving and crash indicator categories, which are divided by average power units multiplied by a utilization factor.

In the case of violation severity, SMS assessments in each BASIC consider both percentiles and acute and critical violations related to that BASIC. If a carrier is found with one or more acute and/or critical violations within the past 12 months, the carrier gets an alert status in the corresponding BASIC, which means the carrier may be prioritized for interventions or further monitoring.

For violation recency, if the time frame is zero to six months ago, the assigned violation severity score is multiplied by three. The good news is that multiplier decreases as time passes, so at the six-to-twelve-month mark the severity score is now only multiplied by two. At the 12-to-24-month mark, it's noted at face value and after 24 months, the information disappears from a carrier's CSA score altogether.

Changing variables

The CSA program is expected to undergo some changes in 2025, according to Garney. The seven BASICs will soon drop their unwieldy acronym and simply be referred to as safety categories. The bigger shift, however, will be the reorganization of these categories.

The unsafe driving category will soon encompass the controlled substance/alcohol violations category, and the vehicle maintenance category is set to be divided into two: vehicle maintenance and vehicle maintenance driver observed. The latter refers to the types of violations likely to be found in a level two walk-around driver/vehicle inspection.

"The FMCSA believes the driver using a good driver vehicle inspection report (DVIR) process should be able to identify these," Garney said of the coming category, where the possibility of violations runs high. "Carriers that have strong DVIR processes are going to be at a competitive advantage, so I'd advise all carriers to examine and work on strengthening their own."

Talaria Transportation knows a thing or two about committing to compliant transportation. The privately held company, which specializes in secure, compliant logistics for legal cannabis and other highly regulated industries, recently unveiled significant upgrades to the technology it uses to power its vehicle fleet.

Talaria uses predictive maintenance technologies that highlight potential vehicle problems, allowing its team to provide maintenance before any interruptions to operations occur. "A CSA score isn't just a number. It's a reflection of your fleet's commitment to safety compliance and operational excellence," says Ari Raptis, Talaria CEO and founder. "A low score keeps regulators off your back, lowers insurance premiums and builds trust with the customer."

These are all points on which Garney concurred. "Your CSA score is pretty much public information so while the FMCSA uses it as [an] enforcement prioritization tool, your business partners and insurers are also using it, as are your shippers, to determine the level of safety and compliance you have. CSA scores make a big impact."

The list goes on

Another thing that's set to change in the coming year is the weighting of violation severity. The FMCSA originally assigned all 959 existing roadside violations a number designated as their severity weight. Now the administration has determined it's not the type of violation a carrier gets that matters the most. It's the number of violations a carrier amasses. Going forward, all violations will be assigned a severity weight of one, with the exception of driver disqualification requirements and out-of-service (OOS) violations, which will both be assigned a weight of two.

"Fundamentally, what the FMCSA is saying is they care less about the type of violation and instead who they're going after now are the people who have the most violations in their category," said Garney. Carriers who once strategized to improve their CSA score by relying on the DataQs system to focus on violations weighted as high as seven or ten will find it harder when every violation carries a severity weight of either one or two.

The FMCSA will also be consolidating some violations into groups. There's an advantage to be gained here in the sense that when a CSA score is being calculated, if a carrier has amassed multiple violations in the same category, the carrier will only be penalized once. This is a big win for carriers who have experienced "stacking" at the hands of overzealous roadside inspectors.

Proportionate percentiles will soon be calculated differently as well. This should please carriers vexed by wildly fluctuating CSA scores due to the safety event peer group they inhabit. The FMCSA's solution is to take the CSA score for the two nearest peer groups and divide them to arrive at a carrier's score. "The goal is to make sure your measure — the number that underlines your percentile score — rises and falls with your percentile. As your measure goes up, so should your percentile," said Garney.

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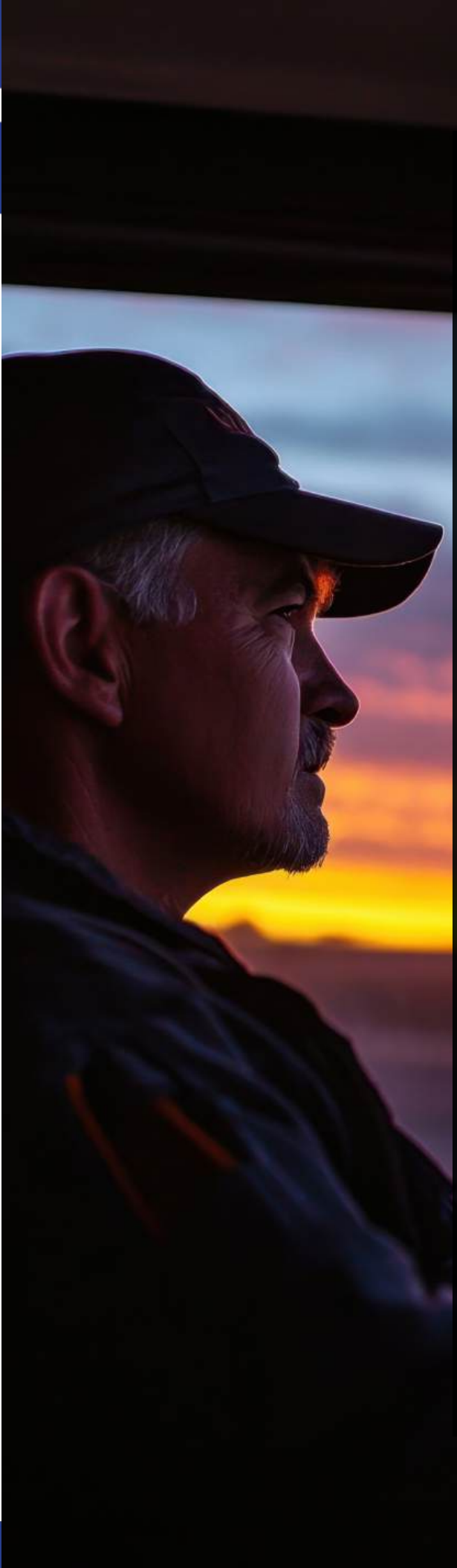

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Finally, look for time weighting to change, thus providing carriers with a quicker way to improve their CSA profiles. Whereas violations up to 24 months once held a one-time weight, now if all violations occurred Common Compliance Pitfalls

It's advantageous for a carrier to be aware of common compliance pitfalls in order to avoid a similar fate. Several factors need close scrutiny. The driver factor is at the top of the list with commercial driver's license violations and medical certification issues causing the most difficulties. Paying attention to those is critical since they're red flag violations.

The driver factor also encompasses clearinghouse and drug testing violations as well as failure to investigate driver backgrounds. What the FMCSA cares most about are motor vehicle records, which detail a driver's driving history, cautions Garney. "Pull those annually."

Operational factors such as unsafe driving and hours-of-service (HOS) are other potential pitfalls. False logs, wrong logging methods, unsafe or distracted driving are all violations that can be derived from a carrier's CSA score and go directly onto an investigative report.

Meanwhile, vehicle maintenance is rife with its own set of common compliance pitfalls. Those include failure to keep minimum records, failure to retain periodic inspection reports as well as drivers neglecting to complete DVIRs on any given day. The latter amounts to a critical violation. "Good DVIRs save lives," Garney concluded.

CSA management strategies

Traditionally, CSA score management has revolved around two things — the passage of time and clean inspections — and for the most part this remains true. However, other steps carriers can take include updating required motor carrier identification reports every two years, or more often if the carrier's fleet happens to be growing.

Garney also recommended leaning into the FMCSA's crash preventability determination program, which allows carriers to request a crash be reviewed as preventable. If a crash is labeled not preventable, it's removed from crash indicator score calculations. "If you're not using this program, your competitors are. As a result, their crash indicator BASIC is improving and because it's a relative system, your score is getting worse," he said.

DataQs is another good way to improve CSA scores. "If you think you shouldn't have been written up for a certain violation, you should be using the free DataQs system to contest that particular violation," said Garney. However, there are a few tips to bear in mind.

Carriers need to be timely and selective about the violations they try to contest on DataQs. File too many and you run the risk of having them thrown out. Carriers' appeals also need to be succinct, respectful and conciliatory in nature if they expect serious consideration. Garney recommended carriers consult the Commercial Vehicle Safety Alliance website, where they'll find plenty of helpful material to strike just the right note on DataQs.

Safety's bedrock

The bottom line is compliance is king and monitoring programs are without a doubt the best way to stay on top of CSA scores. Talaria Transportation serves as a good example. The company utilizes a unique approach to risk management through the use of advanced telematics, an interdisciplinary field encompassing telecommunications and vehicular technologies. "You can't manage what you don't measure," says Raptis.

The technology allows their dispatch team to generate reports and review daily actions from each vehicle. Additionally, Talaria requires two people in the vehicle at all times to manage driver habits and ensure equal accountability.

"By using real time data and telematics, we ensure that every mile driven is a safe one," Raptis said. ✯