

CSA 2010 May Be a Trigger to Outsource

Fleet Data Organization and Compliance are Keys to CSA 2010 Preparedness

Managing safety and regulatory compliance for a fleet has always been a chore. But with CSA 2010, the chance of interaction with DOT is greater than ever before.

Very soon, the way that safety and compliance violations are recorded and graded may have a significant impact on your fleet operation. Once the CSA 2010 Safety Measure System is activated, many companies will need to determine how to fix their deficiencies in order to keep interaction with FMCSA to a minimum. More companies than ever will face an FMCSA intervention.

There's a significant amount of education about CSA 2010 on the FMCSA website (<http://csa2010.fmcsa.dot.gov>). As more fleets are educated, more questions about CSA 2010 'readiness' are raised. The biggest concerns: "What will my scores be and what will they mean?" Since safety scoring processes defined by CSA 2010 can only be measured when taken in context of peer companies of the same fleet size and/or number of relevant inspections, it may be a matter of time before the affects of potential safety issues are felt.

Many fleets are developing a greater self-awareness that their core business isn't compliance or safety – even though these are fundamentally required to run a successful fleet. Both private and for-hire companies are looking to outsource jobs that can impact their CSA 2010 safety measurement system scores. Apart from driver performance that can have a profound impact on fleet visibility – and a job where liability can't be outsourced - there are a number of core functions fleets must perform well, or determine to outsource. Of course the decision to outsource isn't easy, but the idea of handing over tough, complex compliance work can be a load off a Fleet Manager's shoulders.

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Under CSA 2010, it's a company's recent 24-month violation safety record that is under FMCSA scrutiny. Violations (whether "out-of-service" or not) occurring now will be a part of the company safety score for the next two years. This alone may be a compelling reason to turn to outsourcing as the turnkey solution for quicker improvements in processes and compliance.

Commonly outsourced tasks tightly related to CSA 2010 measurement:

▶ Log Auditing

Relationship to CSA 2010 – Driver Fatigue is a measurement area of the CSA 2010 Behavioral Assessment Safety Improvement Categories (BASICS).

Falsified logs or logs with violations can create an FMCSA intervention. An Outsource Provider can audit driver logs and provide reporting that helps companies identify and train to driver failings or weaknesses. As a company, you counsel your drivers, and let the service provider audit the logs, doing what they do best.

▶ Driver File Management

Relationship to CSA 2010 – The Driver Fitness BASIC measures the operation of CMVs by drivers who are unfit to operate due to lack of training, experience, or medical qualifications.

By outsourcing driver file management, the outsource provider can audit contents of a driver qualification file for both content and accuracy. The mere presence of a document in the driver's file doesn't equate to compliance. The provider helps establish and maintain regulatory compliance, and can provide reminders to the carrier of requirements needed. The carrier maintains responsibility for driver performance, but can off-load the tracking of credentials and compliance.

▶ **Drug & Alcohol Management**

Relationship to CSA 2010 – Drug & alcohol use and driver impairment are monitored primarily through roadside inspections. This is a CSA 2010 BASIC measurement. It's important, and required, for fleets to have an adequate random pull and testing program established.

Keeping track of compliance and managing pulls can be a strain. Outsource providers can notify drivers when they're being tested, set up testing clinics, and compile and communicate test results. A well run testing program can also have an impact on the "Crash History" BASIC if it's proven that the driver(s) had post-accident testing if they were required to do so, as spelled out by the regulations.

▶ **Vehicle Maintenance**

Relationship to CSA 2010 – This is also a BASIC safety measurement. Many fleets already outsource preventive maintenance. But there are also fundamental processes that fleets should employ to support an effective maintenance program....such as Driver Vehicle Inspection Report (DVIR) completion and general asset legalization, including titling, permitting and fuel tax reporting. These activities can be managed by an outsource provider, and you can access web-based reports and diagnostics to effectively monitor fleet credentials.

Outsourcing Continues to Be Shared Responsibility

There's no question that outsourcing can save time and contain costs by not having to manage a staff to monitor CSA 2010. But the burden of compliance and safety still falls solely on the company with the fleet. A strong Outsource Provider works with you to ensure that you are satisfied with the quality of the program, and the quality of communication between stakeholders.

CSA 2010 is a magnifying glass on the safety and compliance of all fleets. The overriding goal of FMCSA is to produce a safer environment. More companies in the year 2010 are already looking for outsourcing options that give them assurance that regulations are being complied with, allowing fleet managers to focus on the performance of their driver population.



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About J. J. Keller Outsource Services

J. J. Keller provides all of the services discussed in this paper. The company is renowned for providing superior client service, along with tools and communication to keep fleets abreast of their compliance levels. Their solutions and services are considered second to none in the transportation industry, which is why J. J. Keller's products are purchased by 100% of the top 100 for-hire and private carriers in the United States.

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