



# Six Most Common CSA Violations

## **THE TRUCK**

### **Violation: Lighting**

- 28% of all roadside vehicle violations last year, out of 2.4 million inspections, dealt with lights or reflective materials.
- Light violations are a severity point assessment of 6 CSA points and a conspicuity of reflective tape violations are 3 CSA points.

**Prevention:** Pre and Post trip inspections and reporting of lighting defects on the daily vehicle inspection report.

### **Violation: Brakes**

- 25% of vehicle violations are for brakes, with over 1 million brake violations last year, each with four CSA points.



**Prevention:** Training is key. Make sure drivers know what to look for and when to get assistance with their brakes. The only way to find a brake adjustment problem is to carefully measure the stroke, and adjusting a brake that has an automatic adjuster won't fix the problem (and may make it worse).

### **Violation: Tires**

- 11% of vehicle violations are for tires (half for tread depth), with a CSA severity of eight points.
- Steer tires must have 4/32 inch of tread depth; other tires must have 2/32 inch.

**Prevention:** Pre and Post Trip inspections that identify tires that are getting close to regulation requirements being reported on the daily vehicle inspection report. Drivers need to know how and when to check inflation (with a gauge!) and when it's time for a replacement.

## **THE DRIVER**

### **Violation: Logs**

- “Form & Manner” and “Log Not Current” violations make up 25% of all driver violations at the roadside, far and above any other violation. A form/manner violation carries just one CSA point, but a log that isn’t current is worth five.

**Prevention:** Review hours of service regulations with all drivers upon orientation and throughout the year during driver meetings. Monitor hours of service documentation for violations. Implement a progressive disciplinary policy for violators with termination as the ultimate action taken. Consider implementing electronic logging devices.

### **Violation: Medical issues**

- 12% of driver violations are related to medical issues, often a failure to have a valid medical certificate. These carry a low CSA point value of one or two, although driving while physically ill is a 10-point violation.

**Prevention:** Track the expiration of your drivers’ medical cards and make sure they get updated, placed in drivers’ files, carried in the vehicle and turned in to the state licensing agency. Make sure drivers know exactly what’s required of them, and have consequences in place for those who fail to comply.

Some of these violations may go away once we have the National Registry of Medical Examiners, and once interstate CDL drivers no longer have to carry their medical cards (in Feb. 2015).

### **Violation: English ability**

- This violation has been surging in recent years, currently at 9% of all driver violations and carrying four CSA points.
- Compliance is complicated because there is no yes/no standard. Key for a roadside inspection is being able to fill out paperwork, speak with officers and answer their questions, all in English.

**Prevention:** Your hiring practices should filter out drivers who simply cannot meet the standard. Use training and practice to help drivers know how to respond to typical questions about their logs, their trips and cargo, their insurance, registration, license and their vehicle.

## **"RED FLAG" DRIVER VIOLATIONS**

When investigating a motor carrier, a Safety Investigator (SI) looks at driver history for egregious violations of the Federal Motor Carrier Safety Regulations (FMCSRs). These violations are sometimes referred to as Red Flag Violations and are always investigated as part of a carrier investigation. The SI conducting the investigation looks to see if the violation has been corrected. At present, there are 12 such violations, though this list may be updated periodically. These violations are outlined in the table below, along with the Behavior Analysis and Safety Improvement Categories (BASICS) to which they correspond.

<b>BASIC</b>	<b>FMCSR PART</b>	<b>VIOLATION DESCRIPTION</b>
Driver Fitness	383.21	Operating a commercial motor vehicle (CMV) with more than one driver's license
Driver Fitness	383.23(a)(2)	Operating a CMV without a valid commercial driver's license (CDL)
Driver Fitness	383.51(a)	Driving a CMV (CDL) while disqualified
Driver Fitness	383.91(a)	Operating a CMV with improper CDL group
Driver Fitness	391.11	Unqualified Driver
Driver Fitness	391.11(b)(5)	Driver lacking valid license for type of vehicle being operated
Driver Fitness	391.11(b)(7)	Driver disqualified from operating a CMV
Driver Fitness	391.15(a)	Driving a CMV while disqualified
Controlled Substances/Alcohol	392.4(a)	Driver uses or is in possession of drugs
Controlled Substances/Alcohol	392.5(a)	Possession/use/under influence of alcohol less than 4 hours prior to duty
Fatigued Driving (HOS)	395.13(d)	Driving after being declared out-of-service (OOS)
Vehicle Maintenance	396.9(c)(2)	Operating an OOS vehicle

Any driver violations identified and addressed during carrier investigations that are not corrected may result in a driver Notice of Violation or Notice of Claim.