FMCSA Safety Program Effectiveness Measurement: Carrier Intervention Effectiveness Model (CIEM), Version 1.1 Report for Fiscal Year 2015 Interventions

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FOREWORD

The Federal Motor Carrier Safety Administration (FMCSA), in cooperation with the John A. Volpe National Transportation Systems Center (Volpe), uses a quantitative model to measure the effectiveness of motor carrier interventions in terms of estimated crashes prevented, injuries prevented, and lives saved. The model, documented in this report, is known as the Carrier Intervention Effectiveness Model (CIEM). This model provides FMCSA management with information needed to address the requirements of the Government Performance and Results Act of 1993 (GPRA), which requires Federal agencies to measure the effectiveness of their programs as part of the budget cycle process. It also provides FMCSA and State safety program managers with a quantitative basis for improving enforcement processes and optimizing the allocation of safety resources in the field.

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16. Abstract

The Federal Motor Carrier Safety Administration (FMCSA), in cooperation with the John A. Volpe National Transportation Systems Center (Volpe), uses a quantitative model to measure the effectiveness of motor carrier interventions in terms of estimated crashes prevented, injuries prevented, and lives saved. The model, documented in this report, is known as the Carrier Intervention Effectiveness Model (CIEM). This model provides FMCSA management with information needed to address the requirements of the Government Performance and Results Act of 1993 (GPRA), which requires Federal agencies to measure the effectiveness of their programs as part of the budget cycle process. It also provides FMCSA and State safety program managers with a quantitative basis for improving enforcement processes and optimizing the allocation of safety resources in the field. This report presents CIEM results for fiscal year (FY) 2015.

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SI* (MODERN METRIC) CONVERSION FACTORS

Approximate Conversions to SI Units

Symbol	When You Know	Multiply By	To Find	Symbol
		Length		
in	inches	25.4	millimeters	mm
ft	feet	0.305	meters	m
yd	yards	0.914	meters	m
mi	miles	1.61	kilometers	km
		Area		
in^2	square inches	645.2	square millimeters	mm^2
ft^2	square feet	0.093	square meters	m^2
yd^2	square yards	0.836	square meters	m^2
ac	Acres	0.405	hectares	ha
mi^2	square miles	2.59	square kilometers	km^2
		Volume (volumes greater than 1,000L shall be shown in m^3)		
fl oz	fluid ounces	29.57	milliliters	mL
gal	gallons	3.785	liters	L
ft^3	cubic feet	0.028	cubic meters	m^3
yd^3	cubic yards	0.765	cubic meters	m^3
		Mass		
oz	ounces	28.35	grams	g
lb	pounds	0.454	kilograms	kg
T	short tons (2,000 lb)	0.907	megagrams (or “metric ton”)	Mg (or “t”)
		Temperature (exact degrees)		
°F	Fahrenheit	5(F-32)/9 or (F-32)/1.8	Celsius	°C
		Illumination		
fc	foot-candles	10.76	lux	lx
fl	foot-Lamberts	3.426	candela/m^2	cd/m^2
		Force and Pressure or Stress		
lbf	poundforce	4.45	newtons	N
lbf/in^2	poundforce per square inch	6.89	kilopascals	kPa

Approximate Conversions from SI Units

Symbol	When You Know	Multiply By	To Find	Symbol
		Length		
mm	millimeters	0.039	inches	in
m	meters	3.28	feet	ft
m	meters	1.09	yards	yd
km	kilometers	0.621	miles	mi
		Area		
mm^2	square millimeters	0.0016	square inches	in^2
m^2	square meters	10.764	square feet	ft^2
m^2	square meters	1.195	square yards	yd^2
Ha	hectares	2.47	acres	ac
km^2	square kilometers	0.386	square miles	mi^2
		Volume		
mL	milliliters	0.034	fluid ounces	fl oz
L	liters	0.264	gallons	gal
m^3	cubic meters	35.314	cubic feet	ft^3
m^3	cubic meters	1.307	cubic yards	yd^3
		Mass		
g	grams	0.035	ounces	oz
kg	kilograms	2.202	pounds	lb
Mg (or “t”)	megagrams (or “metric ton”)	1.103	short tons (2,000 lb)	T
		Temperature (exact degrees)		
°C	Celsius	1.8c+32	Fahrenheit	°F
		Illumination		
lx	lux	0.0929	foot-candles	fc
cd/m^2	candela/m^2	0.2919	foot-Lamberts	fl
		Force and Pressure or Stress		
N	newtons	0.225	poundforce	lbf
kPa	kilopascals	0.145	poundforce per square inch	lbf/in^2

* SI is the symbol for the International System of Units. Appropriate rounding should be made to comply with Section 4 of ASTM E380. (Revised March 2003, Section 508-accessible version September 2009.)

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ACRONYMS

Acronym	Definition
ATET	average treatment effect on the treated
CIEM	Carrier Intervention Effectiveness Model
CMV	commercial motor vehicle
CR	compliance review
CREM	Compliance Review Effectiveness Model
CSA	Compliance, Safety, Accountability
FMCSA	Federal Motor Carrier Safety Administration
FY	fiscal year
GPRA	Government Performance and Results Act of 1993
HM	hazardous materials
MCMIS	Motor Carrier Management Information System
MCSAP	Motor Carrier Safety Assistance Program
PRISM	Performance and Registration Information Systems Management
PU	power unit (commercial motor vehicle)
USDOT	U.S. Department of Transportation
Volpe	John A. Volpe National Transportation Systems Center

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EXECUTIVE SUMMARY

In 2010, following an operational model test in select States, the Federal Motor Carrier Safety Administration (FMCSA) began a phased implementation of its Compliance, Safety, Accountability (CSA) program, representing a redesign of the Agency's existing enforcement model. The CSA enforcement model includes an array of carrier intervention types that replaced the one-size-fits-all compliance review (CR) that was implemented as part of the old enforcement model. The new enforcement model was designed to improve safety in the operation of commercial motor vehicles (CMVs).

The introduction of CSA necessitated a revised approach for measuring the benefits and effectiveness of interventions at a national level and on an ongoing basis. The Carrier Intervention Effectiveness Model (CIEM) provides FMCSA with a tool for measuring the safety benefits of carrier interventions. During the phased implementation of CSA, the model incorporates both CRs (where safety impacts were previously measured by the Compliance Review Effectiveness Model, or CREM) and new intervention types (i.e., warning letters, offsite investigations, onsite focused investigations, and onsite comprehensive investigations) when assessing safety benefits.

This approach yields national-level measurements of the effectiveness of FMCSA's carrier interventions. The model is designed to be implemented on an annual basis, focusing on carriers receiving interventions in a given fiscal year (FY). Comparing results over a period of years will provide an indication of the safety impact of FMCSA's compliance and enforcement program.

MODEL APPROACH

The model computes crash rates—defined as crashes per power unit (PU)—for carriers receiving interventions, distinguishing between their crash rates in defined periods prior to and following the interventions. The difference between a carrier's pre- and post-intervention crash rates measures the extent to which its safety performance improves during this timeframe. To control for systemic differences between small and large carrier operations, separate before-after comparisons are made for various carrier size groups, defined in terms of PU count.

In addition, to remove the effect of confounding factors from the calculation of the change in safety performance, the difference between pre- and post-intervention crash rates is adjusted by the change in crash rates of the general carrier population during a corresponding timeframe. A set of carefully designed filters is used to identify and remove missing and outlier carrier data.

The model incorporates statistical significance testing and, as a result, only considers changes in size-group crash rates that are statistically significant when calculating crashes prevented, injuries prevented, and lives saved. The statistically significant results are extrapolated to incorporate carriers that, while receiving interventions, were not included in the initial model calculations because of missing or inaccurate data.

MODEL FINDINGS

All Carriers Receiving Interventions

The model was implemented for carriers receiving interventions in FY 2015. Total interventions decreased slightly from 34,932 in FY 2014 to 34,695 in FY 2015.

Statistically significant crash rate reductions occurred for carriers in three of the four size groups considered by the model. These reductions are estimated to have resulted in the safety benefits shown in Table 1.

Table 1. Safety benefits: all interventions.

Fiscal Year	Crashes Prevented	Injuries Prevented	Lives Saved
2014	5,811	3,316	168
2015	7,136	3,965	212

Additional Analysis

Additional insight can be gained by excluding warning letters from the model, and by implementing the model only for carriers whose first intervention in FY 2015 was a warning letter. These separate model results reveal to what extent the changes in safety benefits observed from year to year are associated with warning letters versus the other intervention types. In this further analysis, both sets of carriers – those whose first intervention was a warning letter and those whose first intervention was not a warning letter – exhibited statistically significant crash rate reductions in three of the four carrier size groups.

1. INTRODUCTION

1.1 BACKGROUND

During the 1980s, Congress passed a series of legislative acts intended to strengthen motor carrier safety regulations. These measures led to the implementation of safety-oriented programs at both the Federal and State levels. The Surface Transportation Assistance Act of 1982 established the Motor Carrier Safety Assistance Program (MCSAP), a grants-in-aid program to States for conducting roadside inspection and traffic enforcement programs aimed at commercial motor vehicles (CMVs). The Motor Carrier Safety Act of 1984 directed the U.S. Department of Transportation (USDOT) to establish safety fitness standards for carriers. The USDOT, in conjunction with the States, implemented MCSAP to fund roadside inspection and traffic enforcement programs, the safety fitness determination process, and a commercial motor carrier rating system based on onsite safety audits called compliance reviews (CRs).

The Safety Program Effectiveness Measurement Project was established to identify major functions and operations (programs) associated with the Federal Motor Carrier Safety Administration's (FMCSA's) mission and develop results-oriented performance measures for the Agency's functions and operations, as called for in the Government Performance and Results Act of 1993 (GPRA). From 2002 through 2009, the benefits of CR activities were assessed using the Compliance Review Effectiveness Model (CREM).[1] In 2010, following an operational model test in select States, FMCSA began a phased implementation of its Compliance, Safety, Accountability (CSA) program, a redesign of the Agency's existing enforcement model. The CSA enforcement model includes an array of carrier intervention types, which replaced the one-size-fits-all CR intervention type implemented as part of the old enforcement model. The new enforcement model was designed to improve safety in the operation of CMVs. The introduction of the new enforcement model in 2010 necessitated a revised approach for measuring the benefits and effectiveness of interventions at a national level and on an ongoing basis.

1.2 PROJECT SCOPE

The Carrier Intervention Effectiveness Model (CIEM) measures the safety benefits of carrier interventions. During the phased implementation of CSA, the model incorporates both CRs, previously measured by the CREM, and additional interventions, including warning letters, offsite investigations, onsite focused investigations and onsite comprehensive investigations. This approach yields national-level measurements of the effectiveness of FMCSA's carrier interventions.

While the new model succeeds the CREM, results from the two models are not directly comparable because the models require different methodologies to assess the different safety programs. However, both models measure the benefits of the programs in terms of crashes prevented, lives saved, and injuries prevented.

[1] Reports documenting these results are available at http://ai.fmcsa.dot.gov/pe/home.aspx.

An objective of this project is to continue to improve the new model, and to update the results on an annual basis. This report presents the results of the CIEM's implementation for carrier interventions in fiscal year (FY) 2015 and describes the functionality of the model and how it is applied. Technical details of the model are presented in the "FMCSA Safety Program Effectiveness Measurement: Carrier Intervention Effectiveness Model, Version 1.1, Technical Report" available at: https://doi.org/10.21949/1502628.

2. FMCSA CARRIER INTERVENTION EFFECTIVENESS MODEL

FMCSA employs a data-driven approach to oversee and enforce commercial motor carrier safety. This approach utilizes a variety of data sources to assign safety risks to motor carriers; the assigned safety risks are then used to prioritize carriers for interventions. The CSA model introduced a new and broader set of carrier interventions, giving FMCSA the flexibility to address safety problems more efficiently. The new set of interventions includes less labor-intensive alternatives to a CR that focus on each motor carrier's specific safety problems. As a result, the CSA program enables FMCSA to reach a larger number of carriers. The CIEM measures the safety benefits of carrier interventions currently used by the agency (including intervention types developed prior to the CSA program that the Agency continues to use) in terms of crashes prevented, injuries prevented, and lives saved.

2.1 MODEL STRUCTURE

The CIEM is a statistical impact evaluation model that uses historical data to compare the safety performance of carriers receiving FMCSA interventions to their safety performance prior to receiving interventions.[2] This comparison is used to establish the extent of safety improvement that can be attributed to interventions. The model is designed to be implemented on an annual basis, focusing on carriers receiving interventions in a given fiscal year.

The model computes crash rates—defined as crashes per power unit (PU)—for carriers receiving interventions, distinguishing between their crash rates in defined periods prior to and following the interventions.[3] The difference between these carriers' pre- and post-intervention crash rates, once adjusted for exogenous factors based on the comparison group, represents the change in their safety performance during this timeframe. To control for systemic differences in how small versus large carriers improve their safety performance when faced with interventions, these calculations are first performed for various carrier size groupings (based on their PU count) and then aggregated.[4]

To remove the effect of confounding factors impacting the calculated change in safety performance, the difference between pre- and post-intervention crash rates is adjusted by the change in crash rates experienced by a comparison group (representing carriers that did not receive interventions) during a similar timeframe. This adjustment removes the effect of historical trends and events (e.g., a national recession).

The CIEM replaced the CREM and shares some of its methodology. However, it employs new approaches to address FMCSA's overall enforcement program interventions, including both CSA and non-CSA interventions completed before, during, and after the transition from the CR program.

[2] The comparison groups referenced throughout this report are only used to adjust final results.

[3] PU values are used as a proxy for carrier exposure to crashes. While vehicle miles travelled (VMT) have the potential to serve as a useful proxy for exposure in the model at a future point in time, FMCSA believes that PU information in MCMIS is currently more reliable.

[4] While additional factors may be used to classify carriers into different comparison groups (e.g., short- versus long-haul operations; for hire versus private fleets), stratification by size was found to be the most effective classification method given data availability.

The CIEM also introduced a component estimating the impact of interventions applied to carriers with missing or suspect census data; such carriers would otherwise be left out of the computation of safety benefits attributable to FMCSA interventions. The model introduced a component determining the statistical significance of its own results, and non-statistically significant findings are excluded from the total estimation of safety benefits calculated in the model.

2.2 CARRIERS WITH INTERVENTIONS: CARRIER TREATMENT GROUP

The model's treatment group consists of carriers that received at least one FMCSA carrier intervention during the fiscal year and passed a set of missing and outlier data filters.

The following set of interventions, recorded in FMCSA's Motor Carrier Management Information System (MCMIS), are used to select treatment group carriers:

- CSA interventions.[5]
  - Warning letter.
  - Offsite investigation.
  - Onsite focused investigation.
  - Onsite comprehensive investigation.
- CRs, including:
  - CR.
  - CR with cargo tank facility review.
  - CR with security contact review.
- Non-ratable CRs on interstate carriers, including focused CRs (which do not receive a rating) and hazardous materials (HM) reviews.
- Performance and Registration Information Systems Management (PRISM) warning letters.[6]

The treatment group filters require that a carrier:

- Is active and reports positive PU counts.
- Is not a new entrant at any point in its pre- and post-intervention periods.
- Meets outlier tests to identify suspect crash and PU data.[7]

[5] This version of the model does not include follow-up verifications, direct notices of violation (DNOVs), direct notices of claims (DNOCs), or Cooperative Safety Plans (CSPs) because the data currently in MCMIS were shown to be inconsistent in terms of completeness and accuracy. Safety audits are not considered a CSA intervention type. Nor are they assessed separately by this model, because safety audits are performed only on new entrant carriers, which have often not been in full operation during the entire 1-year pre-intervention period.

[6] Further information on PRISM is provided by FMCSA at http://www.fmcsa.dot.gov/safety-security/prism/prism.aspx.

[7] Outlier tests are: (a) driver-to-PU and PU-to-driver ratios cannot exceed 7.5, with the exception of exclusively driveaway/towaway carriers; (b) pre- to post-intervention and post- to pre-intervention change in PU count cannot exceed a factor of 3 for carrier size groups 1 and 2 or a factor of 1.75 for size groups 3 and 4. The following are exceptions: size group 1 and 2 carriers can exhibit a factor up to 5 if there is a corresponding change in the pre- to post-intervention or post- to pre-intervention driver count (between a factor of 1.5 and 10), and size group 3 carriers can exhibit a factor up to 2.5 if the corresponding change in driver count is by a factor between 1 and 5 (see Table 4 for size group definitions). This filter allows more variability for smaller carriers because smaller PU changes result in larger proportional changes for these carriers compared to larger carriers; (c) to filter for suspiciously low and suspiciously high crash rates, pre- and post-intervention crash rates must be within five standard

These filters were initially based on those used in the CREM but were strengthened and refined to better identify suspicious data.

2.3 CARRIERS WITHOUT INTERVENTIONS: COMPARISON GROUP

To isolate the effects of interventions from other factors that may have influenced carriers' crash rates more broadly, the treatment group's change in crash rate is adjusted for changes in the general carrier population's crash rates through the use of a comparison group. The comparison group consists of carriers that did not receive an intervention during the comparison period and passed a set of data filters similar to those applied to treatment group carriers.[8]

Comparison group carriers are assigned to size-groups with criteria identical to the treatment group's. The resulting separate comparison size-groups eliminate differences associated with carrier size from the model's calculation of adjusted crash rates.

2.4 MODEL DATA AND TIMEFRAMES

The model uses crash data reported by the States and carrier PU data obtained during interventions or from information submitted by carriers on the Motor Carrier Identification Report (Form MCS-150). These data, stored in MCMIS, are used to calculate pre- and post-intervention crash rates for treatment group carriers and corresponding crash rates for comparison group carriers. Crash data originating from State reporting systems are continuously fed into MCMIS via an automated interface. Consequently, statistics for previous time periods may change depending on the timeliness and completeness of the original reporting. For this study, MCMIS snapshots – which include the most current updates for prior months – are used to provide the most complete and accurate crash data available.[9]

For the treatment group, a carrier's pre-intervention PU value is based on the MCMIS monthly data snapshot from the time period immediately following the first intervention it receives during the fiscal year. This particular snapshot contains the most recent PU information for the carrier at the time of its intervention. The date of the carrier's first intervention is used in order to delineate the pre- and post-intervention periods during the fiscal year.[10] Because some carriers receive multiple interventions within the modeled year, the model does not report the precise impacts of each individual intervention type; rather, it estimates the combined impact of all interventions performed during the modeled year.

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deviations of the carrier size group's mean crash rate, once all other filters have been implemented. Based on analysis of carrier crash incidence, this condition is overridden by any of the following conditions: if (i) the carrier is in size group 1 and has 5 or fewer crashes, or (ii) the carrier is in size groups 2, 3, or 4 and has 6 or fewer crashes; alternatively, carriers with 500 or more PUs must exhibit non-zero crashes regardless of how many standard deviations their crash rate is from the size group mean.

8 The comparison group filters are identical to the treatment group filters. However, since the comparison group carriers do not have intervention dates, their power unit data for these calculations are always based on the modeled year's MCMIS April data snapshot for the pre-intervention period and on the subsequent year's September snapshot for the post-intervention period.

9 Crash data for this report were taken from the December 2017 MCMIS data snapshot.

10 Despite the use of the first intervention as a demarcation point, the impacts of subsequent interventions in the same year are implicitly included in the model. Those subsequent interventions that occur before the end of the carrier's post-intervention period may have sizable impacts during this same period, which will be reflected in the post-intervention crash rates calculated by the model. Conversely, the impacts of subsequent interventions that take place after the post-intervention period are not accounted for in the current model but rather in the next annual implementation of the model, where the first follow-up intervention would serve to delineate new before and after periods.

The 12-month period preceding a carrier's first intervention is defined as its pre-intervention period, while the 12-month period following this intervention is defined as its post-intervention period. The final monthly snapshot for a carrier's post-intervention period is used to define its post-intervention PU value. Pre- and post-intervention crash rates are calculated for all carriers in each size grouping as the number of crashes occurring during these two periods, divided by each period's PU value. Figure 1 illustrates the timeframes delineated by these data points for a hypothetical treatment group carrier with a first intervention in August 2015.[11]

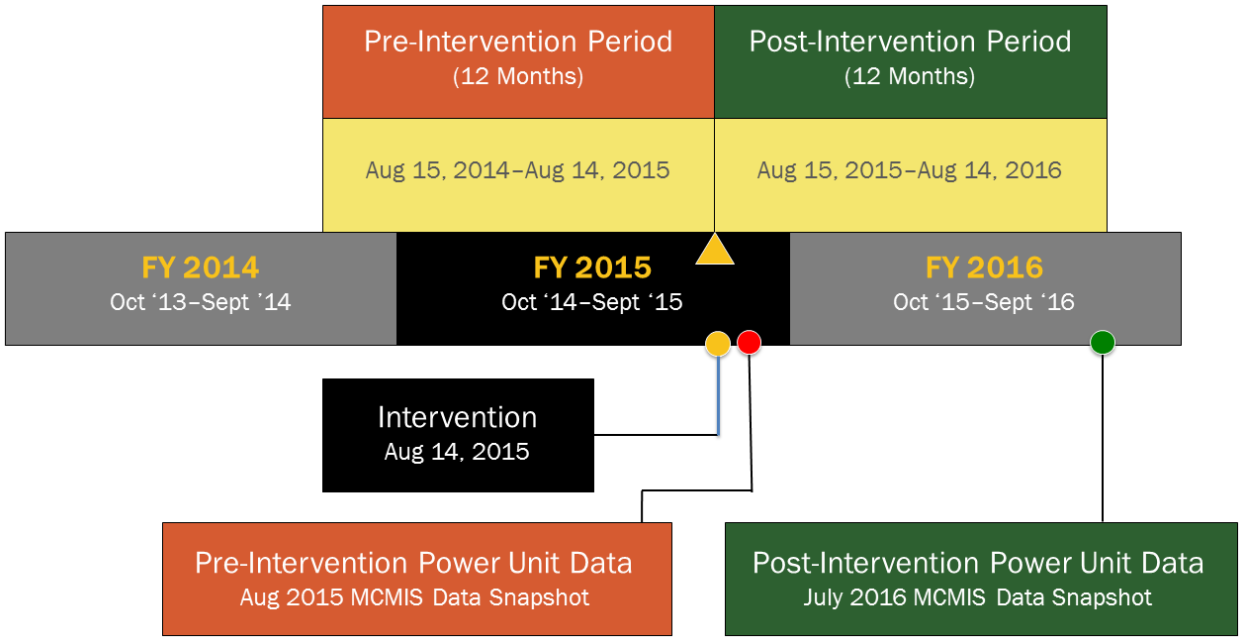

Figure 1. Diagram. Timeline for a carrier with a first intervention on August 14, 2015.

For comparison group carriers, which do not have an intervention throughout the comparison period, periods corresponding to the treatment group's pre- and post-intervention periods are defined as the 18 months preceding and following the midpoint of the fiscal year (March 31st), respectively. Hence, the comparison group pre-intervention period covers the entire fiscal year prior to the modeled year, while the post-intervention period covers the entire fiscal year following the modeled year. These longer periods for the comparison group, compared to the treatment group's 12-month periods, ensure that the comparison group pre- and post-intervention periods cover the entire range of potential pre- and post-intervention periods for all treatment carriers.

The MCMIS data snapshot following March 31 is used to obtain the pre-intervention period PU values for each carrier in the comparison group, and the final snapshot of the post-intervention period is used for post-intervention period PU values. As with the treatment group, for each size group, each comparison group carrier's crash rates are calculated as their number of crashes

[11] In this study, crash rates are attributed to size groups, which are aggregations of carriers based on the number of PUs they operate. Thus, crash rate statistics for pre-intervention and post-intervention periods for each size group are based on summations of crash and PU data for all carriers (measured in accordance with the individual carrier's date of intervention) in the size group.

occurring during each period divided by the corresponding PU value.[12] Figure 2 illustrates the timeframes delineated by these data points for the FY 2015 comparison group.

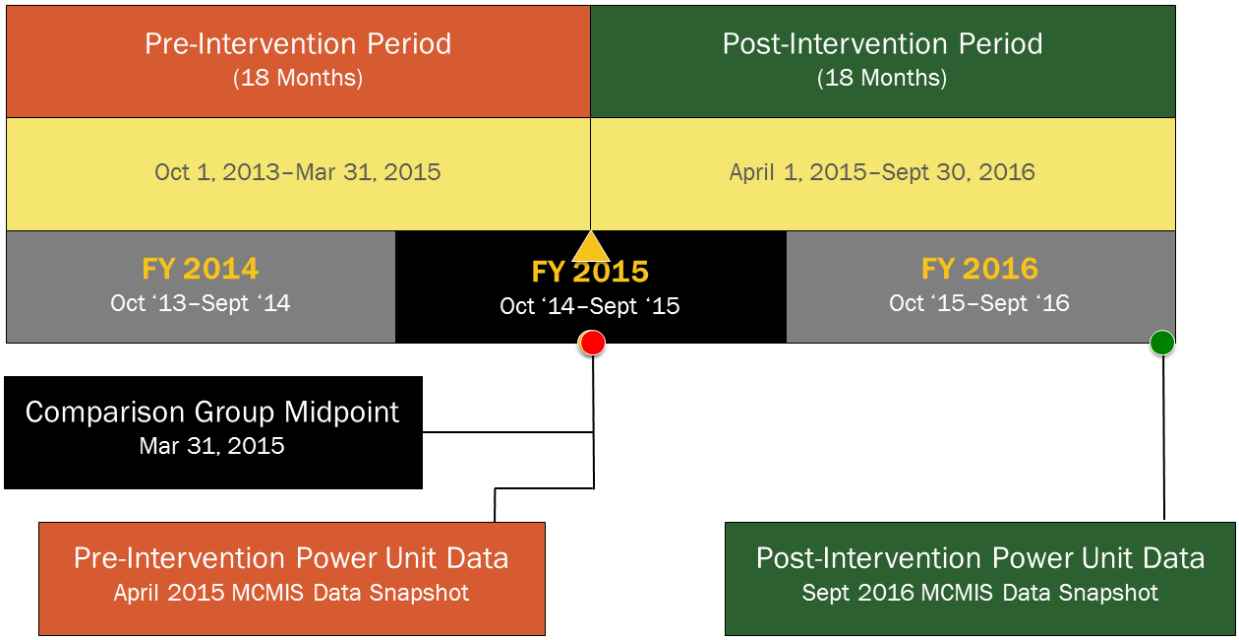

Figure 2. Diagram. Timeline for an FY 2015 comparison group carrier.

2.5 CALCULATION OF CRASHES PREVENTED

Pre- and post-intervention crash rates are used by the model to determine the change in crash rates, by carrier size group, for the treatment and comparison groups. This change is converted to a percent measure by dividing the change by the original (pre-intervention) crash rate. The difference between the treatment and comparison groups' crash rate changes, known as the average treatment effect on the treated (ATET), is the crash rate reduction attributed to interventions.[13] Figure 3 illustrates the steps used to determine this reduction in each size group.

$$\textit{Crash Rate Reduction Due to Interventions} = \left[\text{Treatment Group Crash Rate Reduction, pre- to post-intervention } \frac{[CR_{PRE} - CR_{POST}]}{CR_{PRE}}\right] - \left[\text{Comparison Group Crash Rate Reduction, pre- to post-FY midpoint } \frac{[CR_{PRE} - CR_{POST}]}{CR_{PRE}}\right]$$

Figure 3. Formula. Crash rate reduction due to interventions.

[12] To account for the comparison group's pre- and post-intervention periods being longer than those for the treatment group (eighteen versus twelve months), comparison group crash rates are divided by 1.5 to yield equivalent annual crash rates.

[13] See Abadie, Alberto (2005). *Semiparametric Difference-in-Differences Estimators*, Review of Economic Studies (72, 1-19) for further information on Average Treatment Effect on the Treated.

Figure 4 shows how the crash rate reduction due to interventions is converted to a measure of crashes prevented, which also depends on the treatment group's pre-intervention crashes and pre- and post-intervention PU counts. This reduction is calculated separately for each carrier size group and added across the four size groups, yielding an initial estimate of total crashes prevented during the modeled fiscal year among treatment group carriers.

$$\text{Crashes Prevented} = \left[\frac{\text{Crash Rate Treatment}_{PRE} - \text{Crash Rate Treatment}_{POST}}{\text{Crash Rate Treatment}_{PRE}} - \frac{\text{Crash Rate Comparison}_{PRE} - \text{Crash Rate Comparison}_{POST}}{\text{Crash Rate Comparison}_{PRE}} \right] \times \frac{\text{Crashes Treatment}_{PRE}}{\text{Treatment PU}_{PRE}} \times \text{Treatment PU}_{POST}$$

Figure 4. Formula. Initial estimate of crashes prevented as a result of interventions.

Two additional steps are required to estimate crashes prevented across the entire population of interstate and intrastate carriers. The first step is a test to identify which of the initial crash rate reduction estimates are statistically significant at a particular target level (in this analysis, the 95 percent level). This test determines whether the treatment size-group estimated crash rate changes, adjusted for the comparison group crash rate changes by carrier size group, are different from zero at the 0.05 statistical significance level (i.e., the 95 percent confidence interval around the estimated effect on crash rates does not include zero).[14] Crash rate changes that do not pass this test are not attributed to the interventions and are not used to estimate crashes prevented.

The final step for determining crashes prevented across the motor carrier population is to account for the crashes prevented among carriers that received interventions but were excluded from the treatment group due to missing or outlier data. Such carriers, on average, can be assumed to exhibit a response to interventions similar to that of the observed treatment group. Therefore, the results from the observed treatment group crash rate reductions are extrapolated to account for potential crashes prevented among these additional carriers. The sum of crashes prevented among the treatment group carriers included in the model and those filtered out of the model represents the total crashes prevented as a result of the interventions performed in a given fiscal year.

2.6 CALCULATION OF DIRECT SAFETY BENEFITS

Once the model estimates the total crashes prevented from interventions performed during the fiscal year, injuries prevented and lives saved as a result of the crashes prevented can be estimated using historical crash severity data. This model uses 2-year average probabilities of a crash resulting in an injury or fatality, along with 2-year average values of the number of injuries and fatalities in such crashes. Two-year averages are used, rather than just 1 year of crash statistics, to obtain more stable and representative estimates. Hence, for each model year, the 2-year averages are calculated using historical data on crashes that occurred during the modeled fiscal year and the prior fiscal year, and the frequency of fatalities and injuries occurring in such

[14] For further information, see Cochran, William G. (1977). *Sampling Techniques* (third edition).

crashes.[15] Note: All averages are for the 2-year period encompassing the modeled fiscal year and the prior year.

Figure 5 presents the formulas for these calculations.

$$\textit{Number of } \textbf{\textit{fatal crashes}} \textit{ prevented} =$$

$$\textit{probability of a fatal crash given a crash occurred } \boldsymbol{x} \textit{ number of crashes prevented}$$

$$\textit{Number of } \textbf{\textit{injury crashes}} \textit{ prevented} =$$

$$\textit{probability of an injury crash given a crash occurred } \boldsymbol{x} \textit{ number of crashes prevented}$$

$$\textbf{\textit{Lives saved}} =$$

$$\textit{number of fatal crashes prevented } \boldsymbol{x} \textit{ average number of fatalities per fatal crash}$$

$$\textbf{\textit{Injuries prevented}} =$$

$$(\textit{average number of injuries per fatal crash } \boldsymbol{x} \textit{ number of fatal crashes prevented}) + (\textit{average number of injuries per injury crash } \boldsymbol{x} \textit{ number of injury crashes prevented})$$

Note: All averages are for the 2-year period encompassing the modeled fiscal year and the prior year.

Figure 5. Multiple formulas. Calculating numbers of fatal crashes prevented, injury crashes prevented, lives saved, and injuries prevented.

[15] The distribution of crashes by severity is determined at the national level, assuming the same distribution holds across the carrier size groups.

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3. RESULTS OF IMPLEMENTING THE MODEL

3.1 RESULTS INCLUDING ALL INTERVENTION TYPES

The model was implemented for carriers receiving the specified intervention types in FY 2015. Table 2 presents two sets of data for FY 2015 and for the two preceding fiscal years. The first three columns show the number of interventions conducted by FMCSA and its State partners and are considered as input into the model, by type, for each of the three fiscal years. The next three columns report the number of carriers receiving these intervention types as their first intervention in each fiscal year. As explained in the previous section, the model uses the number of carriers that had one or more interventions in a given year, based on the date of the first intervention, regardless of subsequent interventions. Since the model uses the date of the first intervention to determine which carriers had interventions during the modeled year, the totals in the last three columns represent the total number of carriers considered by the model for each modeled year.

Table 2. Carrier interventions by type, and number of carriers by first intervention.

Intervention Type	Number of Interventions FY 2013	Number of Interventions FY 2014	Number of Interventions FY2015	Number of Carriers Receiving Interventions (by first intervention) FY 2013	Number of Carriers Receiving Interventions (by first intervention) FY 2014	Number of Carriers Receiving Interventions (by first intervention) FY 2015
CSA Warning Letter	20,225	20,535	20,443	20,206	20,529	20,437
Offsite Investigation	619	381	169	591	334	146
Onsite Focused Investigation	9,388	7,376	7,911	8,913	6,995	7,471
Onsite Comprehensive Investigation*	5,796	5,891	5,395	5,451	5,587	5,140
Non-ratable Review	2,112	749	777	2,028	687	740
Total	**38,140**	**34,932**	**34,695**	**37,189**	**34,132**	**33,934**

*CRs are now included as Onsite Comprehensive Investigations

Total interventions declined slightly from FY 2014 to FY 2015 by less than 1 percent. This follows a 8.5 percent decline in total interventions in FY 2014.

Table 3 displays the number of carriers failing each data quality filter (filters discussed in Section 2.2) and the resulting number of treatment group carriers for the three modeled years.

Table 3. Carriers excluded from treatment group by data quality filters and resulting treatment group totals.

Filter Criteria	FY 2013	FY 2014	FY 2015
Inactive during the pre or post periods	2,239	1,954	2,004
Zero power units during the pre or post periods	2,432	2,001	2,066
New entrant during the pre or post periods	8,719	8,144	8,514
Fails driver-to-PU ratios	167	153	126
Fails change in pre-PU to post-PU or pre-driver to post-driver ratios	680	594	575
Carriers with 500+ PUs and zero crashes	11	5	6
Fails crash rate thresholds	16	17	20
Having an out-of-service order during the pre or post period	52	46	57
Total excluded carriers*	**10,771**	**9,793**	**10,071**
Total carriers receiving interventions	**37,189**	**34,680**	**33,934**
Percent excluded	**29.0%**	**28.2%**	**29.7%**
Total carriers in treatment group	**26,418**	**24,339**	**23,863**

*A carrier may be excluded by multiple criteria; therefore, the total excluded carriers does not equal the sum of the carriers meeting each filter criteria.

The first three filters in Table 3 account for the majority of the carriers excluded across the three years by these data quality checks. The remaining filters impact a much smaller number of carriers, and the proportion of total carriers screened out by them during each fiscal year is relatively stable.

Table 4 presents the number of treatment and comparison group carriers for FY 2015 and the two preceding fiscal years by size group. Most of the decrease in the number of treatment group carriers stems from the decrease in size group 1. The number of comparison group carriers also decreased in FY 2015 (by approximately 15 percent), primarily due to an increase in carriers identified in MCMIS as "inactive."[16] This decrease in comparison group carriers also stems from a decrease occurring in size group 1.

Table 4. Number of treatment and comparison group carriers for FY 2013–15, by size group.

Carrier Size Group	FY 2013 Treatment Group	FY 2014 Treatment Group	FY 2015 Treatment Group	FY 2013 Comparison Group	FY 2014 Comparison Group	FY 2015 Comparison Group
1 (1–5 PUs)	14,580	13,652	13,185	873,160	888,154	756,119
2 (6–20 PUs)	7,898	7,199	7,207	74,793	77,184	68,190
3 (21–100 PUs)	3,194	2,879	2,855	14,606	15,613	13,975
4 (100+ PUs)	746	609	616	1,986	2,235	2,253
Total	**26,418**	**24,339**	**23,863**	**964,545**	**983,186**	**840,537**

[16] Since November, 2013, FMCSA has had a policy of listing carriers as inactive in MCMIS if they do not update their registration information with the agency in a timely manner. This policy may have contributed to the reduction in the number of comparsion group carriers in FY 2015.

3.1.1 Crash Rate Reduction

Table 5 presents the initial treatment and comparison group crash rate reductions by year and carrier size group.

Table 5. Initial treatment and comparison group crash rate reductions for FY 2013–15, by size group.

Carrier Size Group	FY 2013 Treatment Group	FY 2014 Treatment Group	FY 2015 Treatment Group	FY 2013 Comparison Group	FY 2014 Comparison Group	FY 2015 Comparison Group
1 (1–5 PUs)	40.1%	44.3%	51.8%	-3.5%	-2.6%	-1.6%
2 (6–20 PUs)	28.0%	28.2%	35.9%	-12.6%	-7.3%	-1.3%
3 (21–100 PUs)	12.7%	17.4%	22.8%	-10.3%	-3.4%	0.4%
4 (100+ PUs)	3.0%	2.7%	4.3%	-6.0%	2.6%	3.1%

Note: A negative crash rate reduction indicates an increase in crash rate.

Note that the crash rate reductions for the FY 2015 comparison group's size groups 1 and 2 in Table 5 are negative (indicating increases in crash rates); this will amplify the crash rate reductions of the treatment group carriers for these two size groups in the subsequent step of the model, when net crash rate reductions due to interventions are calculated. The nonnegative reductions in crash rate for size groups 3 and 4 of the comparison group will reduce the net crash rate reduction for those particular size groups.

Table 6 presents the net percent reductions in crash rates, from the pre- to the post-intervention periods, for the treatment group, by year and carrier size group..

Table 6. Net percent reductions in crash rates.

By Carrier Size Group	FY 2013	FY 2014	FY 2015
1 (1–5 PUs)	43.6%	47.0%	53.4%
2 (6–20 PUs)	40.6%	35.5%	37.2%
3 (21–100 PUs)	23.1%	20.9%	22.4%
4 (100+ PUs)	9.0%	0.2%*	1.2%*

Note: A negative crash rate reduction indicates an increase in crash rate. Due to rounding, values in this table may not equal the treatment group crash rates minus comparison group crash rates from Table 5.

*Non-statistically significant adjusted reduction.

The table suggests that, as in previous years, smaller carriers generally exhibit greater net crash rate reductions from interventions than their larger counterparts. This is also consistent with results obtained from the previous enforcement model, CREM, used to calculate safety benefits for years 2002-09.

As with FY 2014, which showed statistically significant net crash rate reductions occurring in all size groups except size group 4, the FY 2015 reductions were not statistically significant for size group 4.

3.1.2 Safety Benefits

Table 7 presents estimated safety benefits associated with FMCSA carrier interventions for FY 2015 and the preceding two fiscal years, in terms of crashes prevented, injuries prevented, and lives saved.[17] The left side of the table presents estimated crashes prevented, injuries prevented, and lives saved among treatment group carriers that passed the model's data filters. The right side of the table extrapolates these benefits to all carriers receiving interventions in FY 2015, including those screened out of the initial model calculations by the data filters. These estimated benefits increased in FY 2015, compared to FY 2014, due to increased crash rate reductions across the size groups. After extrapolating to all carriers receiving interventions in FY 2015, it is estimated that 7,136 crashes were prevented, resulting in 3,965 injuries prevented and 212 lives saved.

Table 7. Estimated crashes prevented, injuries prevented, and lives saved.

Fiscal Year	Treatment Group: Number of Carriers	Treatment Group: Crashes Prevented	Treatment Group: Injuries Prevented	Treatment Group: Lives Saved	Extrapolated to All Carriers Receiving Interventions: Number of Carriers	Extrapolated to All Carriers Receiving Interventions: Crashes Prevented	Extrapolated to All Carriers Receiving Interventions: Injuries Prevented	Extrapolated to All Carriers Receiving Interventions: Lives Saved
2013	26,418	5,616	3,370	177	37,189	7,256	4,354	229
2014	24,339	4,339	2,476	126	34,132	5,811	3,316	168
2015	23,863	5,232	2,907	155	33,934	7,136	3,965	212

The safety benefits reported in Table 7 reflect only those associated with statistically significant net crash rate reductions within the size groups, as reported in Table 6. Carrier size groups not yielding statistically significant crash rate improvements during the post-intervention period, after adjusting for crash rate changes in the comparison group, are assumed to have had no safety benefits.

3.2 RESULTS EXCLUDING WARNING LETTER AS A FIRST INTERVENTION

Additional insight can be gained by examining the impact of excluding warning letters from the analysis and by implementing the model only for carriers whose first intervention was a warning letter. Specifically, these separate model results can reveal to what extent the changes in safety benefits observed from year to year are associated with the large observed changes in the number of warning letters issued versus the other intervention types in the corresponding years.[18] This

[17] Lives saved and injuries prevented are calculated using two-year average crash severity statistics, as follows:

Fiscal Year	Fatal Crashes (% of Total)	Injury Crashes (% of total)	Fatalities per Fatal Crash	Injuries per Fatal Crash	Injuries per Injury Crash
FY 2013	2.8%	38.2%	1.13	1.00	1.50
FY 2014	2.6%	36.7%	1.12	1.02	1.48
FY 2015	2.6%	36.3%	1.13	0.91	1.47

[18] Because some carriers receive a warning letter followed by a subsequent intervention, this analysis does not identify the safety benefits associated exclusively with warning letters; rather, it identifies the safety benefits associated with warning letters as a first intervention in the fiscal year. However, since the vast majority of warning letters are not followed by an intervention in the same fiscal year, the results of implementing

section reports the results of implementing the model for carriers who received intervention types other than warning letters as their first intervention. Section 3.3 reports the results of implementing the model only for carriers whose first intervention was a warning letter.

Table 8 presents the number of treatment group carriers, by size group, excluding carriers that received a warning letter as a first intervention. The number of treatment group carriers not receiving a warning letter as a first intervention declined very slightly from FY 2014 to FY 2015.

Table 8. Number of treatment group carriers, by size group, excluding carriers that received a warning letter as their first intervention.

Carrier Size Group	FY 2013	FY 2014	FY 2015
1 (1–5 PUs)	6,659	5,255	5,116
2 (6–20 PUs)	3,914	3,203	3,250
3 (21–100 PUs)	1,660	1,415	1,466
4 (100+ PUs)	412	348	341
Total	**12,645**	**10,221**	**10,173**

3.2.1 Crash Rate Reduction

Table 9 presents the percent reductions in crash rate, by carrier size group, for both treatment group carriers whose first intervention was not a warning letter and for comparison group carriers. The comparison group utilized here comprises the same carriers used for the comparison group in the overall model, as shown in Table 4.

Table 9. Treatment and comparison group percent reductions in crash rate, excluding carriers that received a warning letter as their first intervention.

Carrier Size Group	FY 2013 Treatment Group	FY 2014 Treatment Group	FY 2015 Treatment Group	FY 2013 Comparison Group	FY 2014 Comparison Group	FY 2015 Comparison Group
1 (1–5 PUs)	34.4%	36.2%	46.7%	-3.5%	-2.6%	-1.6%
2 (6–20 PUs)	19.9%	17.4%	30.7%	-12.6%	-7.3%	-1.3%
3 (21–100 PUs)	11.2%	12.2%	16.8%	-10.3%	-3.4%	0.4%
4 (100+ PUs)	0.9%	2.5%	5.1%	-6.0%	2.6%	3.1%

Note: A negative crash rate reduction indicates an increase in crash rate.

Table 10 presents the crash rate percent reductions, by carrier size group, for these same treatment carriers, adjusted for the crash rate reductions in the comparison group.

the model for carriers with warning letters as the first intervention may be similar to what would be obtained by only considering carriers that received warning letters and no other interventions during the fiscal year.

Table 10. Net percent reductions in crash rates, excluding carriers that received a warning letter as their first intervention.

Carrier Size Group	FY 2013	FY 2014	FY 2015
1 (1–5 PUs)	37.9%	38.9%	48.3%
2 (6–20 PUs)	32.5%	24.7%	32.0%
3 (21–100 PUs)	21.6%	15.5%	16.4%
4 (100+ PUs)	7.0%	-0.1%*	2.0%*

Note: A negative crash rate reduction indicates an increase in crash rate. Due to rounding, values in this table may not equal the treatment group crash rates minus the comparison group crash rates from Table 9.

* Non-statistically significant net reductions.

Carriers that received a first-intervention other than a warning letter in FY 2015 exhibited significant crash rate reductions in all size groups except size group 4 (100+ PUs). However, compared to the results for all intervention types combined, these net crash rate reductions are about 10-15 percent lower, as was the case in previous years.

3.2.2 Safety Benefits

Table 11 presents estimated safety benefits, by year, as a result of FMCSA interventions, excluding carriers whose first intervention in the fiscal year was a warning letter. The left side of the table presents the estimated crashes prevented, injuries prevented, and lives saved among treatment group carriers. The right side of the table extrapolates these benefits to all carriers receiving these interventions, including those screened out of the initial model calculations by the data filters.

Table 11. Estimated crashes prevented, injuries prevented, and lives saved, excluding carriers that received a warning letter as their first intervention.

Fiscal Year	Treatment Group: Number of Carriers	Treatment Group: Crashes Prevented	Treatment Group: Injuries Prevented	Treatment Group: Lives Saved	Extrapolated to All Carriers Receiving Interventions: Number of Carriers	Extrapolated to All Carriers Receiving Interventions: Crashes Prevented	Extrapolated to All Carriers Receiving Interventions: Injuries Prevented	Extrapolated to All Carriers Receiving Interventions: Lives Saved
2013	12,645	2,348	1,409	74	16,983	2,933	1,760	92
2014	10,221	1,384	790	40	13,603	1,775	1,013	51
2015	10,173	1,990	1,106	59	13,497	2,565	1,425	76

The safety benefits reported in Table 11 reflect only those associated with statistically significant net crash rate reductions, as reported in Table 10. Carrier size groups not yielding statistically significant crash rate improvements during the post-intervention period, after adjusting for crash rate changes in the comparison group, are assumed to have yielded no safety benefits.

Safety benefits extrapolated to all carriers whose first intervention was not a warning letter in FY 2015 are estimated to be 2,565 crashes prevented, 1,425 injuries prevented, and 76 lives saved.

3.3 RESULTS FOR WARNING LETTER AS A FIRST INTERVENTION

This section reports the results of implementing the model only for carriers whose first intervention was a warning letter. Table 12 presents the number of treatment group carriers, by year and size group, receiving a warning letter as a first intervention. The number of carriers receiving warning letters as a first intervention has remained relatively constant from FY 2013 to FY 2015.

Table 12. Number of treatment group carriers receiving a warning letter as their first intervention, by size group.

Carrier Size Group	FY 2013	FY 2014	FY 2015
1 (1–5 PUs)	7,921	8,397	8,069
2 (6–20 PUs)	3,984	3,996	3,957
3 (21–100 PUs)	1,534	1,464	1,389
4 (100+ PUs)	334	261	275
Total	**13,773**	**14,118**	**13,690**

3.3.1 Crash Rate Reduction

Table 13 presents the treatment group initial percent reductions in crash rate from the pre- to the post-intervention period, by year and carrier size group, for carriers whose first intervention was a warning letter and for the comparison group. The comparison group utilized here comprises the same comparison group carriers used for the overall model, as reported in Table 4. When comparing this table to Table 5, one notes that for size groups 1-3, the initial percent reductions in crash rate for this subset of treatment group carriers tend to be slightly higher than the percent reductions achieved for all treatment carriers receiving interventions.

Table 13. Treatment and comparison group crash rate reductions for carriers receiving a warning letter as their first intervention.

Carrier Size Group	FY 2013 Treatment Group	FY 2014 Treatment Group	FY 2015 Treatment Group	FY 2013 Comparison Group	FY 2014 Comparison Group	FY 2015 Comparison Group
1 (1–5 PUs)	44.0%	48.6%	54.8%	-3.5%	-2.6%	-1.6%
2 (6–20 PUs)	35.9%	36.9%	40.8%	-12.6%	-7.3%	-1.3%
3 (21–100 PUs)	14.7%	23.2%	30.4%	-10.3%	-3.4%	0.4%
4 (100+ PUs)	5.5%	3.1%	2.4%	-6.0%	2.6%	3.1%

Note: A negative crash rate reduction indicates an increase in crash rate.

Table 14 presents the crash rate percent reductions, by carrier size group, for these same treatment carriers, adjusted for the crash rate reductions in the comparison group. Similar to the net crash rate reductions observed for FY 2014, the net reductions for FY 2015 are statistically significant for size groups 1, 2, and 3, but not for size group 4.

Table 14. Net crash rate reductions (treatment minus comparison group) for carriers receiving warning letter as first intervention.

Carrier Size Group	FY 2013	FY 2014	FY 2015
1 (1–5 PUs)	47.5%	51.2%	56.4%
2 (6–20 PUs)	48.5%	44.2%	42.0%
3 (21–100 PUs)	25.1%	26.6%	30.0%
4 (≥100 PUs)	11.5%	0.5%*	-0.7%*

Note: A negative crash rate reduction indicates an increase in crash rate. Due to rounding, values in this table may not equal the treatment group crash rates minus comparison group crash rates from Table 13.

*Non-statistically significant net reduction.

3.3.2 Safety Benefits

Table 15 presents the estimated safety benefits, by year, experienced by carriers receiving a warning letter as their first intervention. The left side of the table presents crashes prevented, injuries prevented, and lives saved among treatment group carriers. The right side of the table extrapolates these benefits to all carriers receiving warning letters as a first intervention, including those screened out of the initial calculations by the model's data filters.

Table 15. Estimated crashes prevented, injuries prevented, and lives saved: carriers receiving a warning letter as their first intervention.

Fiscal Year	Treatment Group: Number of Carriers	Treatment Group: Crashes Prevented	Treatment Group: Injuries Prevented	Treatment Group: Lives Saved	Extrapolated to All Carriers Receiving Interventions: Number of Carriers	Extrapolated to All Carriers Receiving Interventions: Crashes Prevented	Extrapolated to All Carriers Receiving Interventions: Injuries Prevented	Extrapolated to All Carriers Receiving Interventions: Lives Saved
2013	13,773	3,280	1,969	104	20,206	4,373	2,625	138
2014	14,118	2,964	1,692	86	20,529	4,088	2,333	118
2015	13,690	3,244	1,803	96	20,437	4,610	2,562	137

As is the case with carriers receiving any intervention and those receiving interventions other than warning letters, these benefits increased in FY 2015, when compared to FY 2014. Overall, it is estimated that 4,610 crashes were prevented, resulting in 2,562 injuries prevented and 137 lives saved, attributable to carriers receiving warning letters as a first intervention in FY15.

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4. CONCLUSIONS

CIEM provides FMCSA with a tool for measuring the safety benefits of carrier interventions. The model incorporates intervention types currently used by the agency, including those measured by the previous CREM, as well as additional new intervention types (i.e., warning letters, offsite investigations, onsite focused investigations, and onsite comprehensive investigations) when assessing safety benefits.

Overall, the set of FMCSA intervention types specified in the model are shown to have reduced motor carrier crash rates in FY 2015 (as in prior years). Consistent with prior years' results, crash rate reductions are generally more pronounced for the smaller carrier size groups. Total carrier interventions declined slightly in FY 2015. However, overall estimated safety benefits in terms of crashes and injuries prevented and lives saved increased.

Further analysis evaluated two subsets of the full treatment group: carriers whose first intervention each year was not a warning letter, and carriers whose first intervention was a warning letter. This further analysis provides a measure of the effectiveness of interventions using CSA warning letters as a first intervention. The findings suggest that warning letters, which are less expensive than more labor-intensive interventions, can be an efficient tool in reducing crashes for many carriers.

In summary, the FY 2015 data on pre- and post-intervention safety performance provide strong evidence for the effectiveness of FMCSA's carrier interventions, as in previous years. Future implementation of the model will enable FMCSA to continue to measure the impacts of carrier interventions.