

ISSUE NUMBER

25-040-AIC

ISSUE NAME

Operational Policy 4 - Maintenance of Certification for Safety Investigations

STATUS

Open

Audits and Investigations Committee

NAME

Denise

AGENCY

MN Dept. of Transportation

ADDRESS

180 County Rd 26
Windom, Minnesota 56150
United States

PHONE

6122367961

EMAILdenise.nichols@state.mn.us**SUMMARY OF ISSUE**

Requesting clarification for CVSA Operational Policy 4 regarding the number of safety investigations to be completed for maintenance of certification during the remainder of the performance period following a Safety Investigator's initial certification.

JUSTIFICATION OR NEED

CVSA Operational Policy 4 provides a chart indicating the number of safety investigations to be completed for maintenance of certification during the remainder of the performance period following a Safety Investigator's initial certification (Page 19 Op. Policy 4). This chart indicates the number of investigations to be completed by a Safety Investigator based on the quarter of the performance year in which initial certification was completed. This chart's 2nd column (Number of Safety Investigations Required for Maintenance) fails to provide details as to what "type of investigation" would satisfy this "Number of Safety Investigation Required for Maintenance". Does the "Number" in column 2 refer to full Comprehensive Investigations? Will Focused Investigations qualify? Do a certain number of Regulatory Factors and/or Parts need to be investigated as is detailed in the General Maintenance of Safety Investigators (Table 2 of CVSA Ops. Policy 4, page 18)?

FMCSA's Internal Agency Enforcement Policy (MC-SE-2022-002) issued July 18, 2022 includes a similar chart detailing the "Number Required for Maintenance" (page 5) which indicates the number of investigations required to be completed based on the quarter in which the Safety Investigators completed their Initial Certification. There is a footnote to this column which indicates "During this transition to maintenance of certification the number of investigations for each factor (i.e., Regulatory Part)".

REQUEST FOR ACTION

An explanation and/or footnote [similar to what appears in the FMCSA Internal Agency Enforcement Policy (MC-SE-2022-002)] should be added to CVSA Operational Policy 4's chart which indicates the number and details for the types of safety investigation(s) to be completed for maintenance of certification during the remainder of the performance period following a Safety Investigator's initial certification.

SUPPORTING DOCUMENTS/PHOTOS

- [Certification-Policy_MC_SE-2022_002_Revised_July-15-2022_Signed_0.pdf](#)