

Organizational Partnering to Enable EHS Advancement



**AMERICAN SOCIETY OF
SAFETY PROFESSIONALS**

November 2020

New England Area

Professional Development Conference

YOUR SPEAKERS FOR TODAY

Dave Crowley, CSP, CHMM, STS
HP Hood LLC
Sr. EHS Director

ASSP Past President
Greater Boston Chapter
2004-2005

ASSP Region VIII
Past ARVP of Communications

ASSP Foundation
Past Chair/Trustee 2013-2019

ASSP Foundation 2019-2020
Chair of Nom & Gov Committee

Remi Fleurette
HP Hood LLC
EHS Director

ASSP Past President
Greater Boston Chapter
2006-2007 + 2007-2008

ASSP Mining Practice Specialty
Past Administrator

ASSP Transportation Practice Specialty
Past Administrator

ASSP Professional Conduct Committee
Member 2020-present



AMERICAN SOCIETY OF
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Organizational Partnering to Enable EHS Advancement

Ok, so what's this mean?

- Highlight the connection of EHS serving as a business partner with other functions in the employment world.
- Call it partnering or collaborating - - it is inevitable that EHS professionals will encounter “asks” to do non-trad EHS tasks.



Dave's first non-trad EHS task:

“...don't let my car ever get dirty or run outta gas...”



Remi's first non-trad EHS task:

“...don't let the kiln furnace run out of wood chips...”

HP Hood LLC

Family owned business

Annual sales approx. \$2.5 billion.

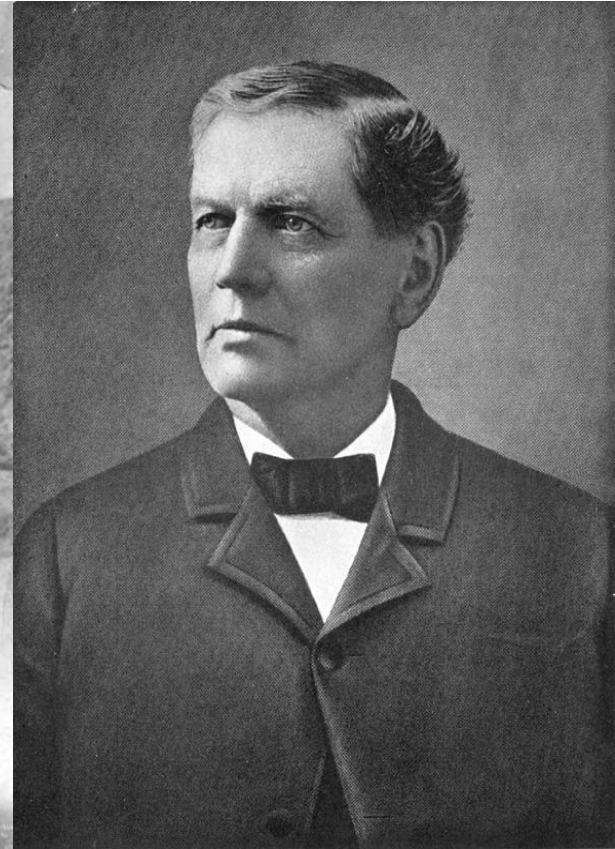
13 plants w/coast-to-coast presence.

3,200 employees; 250 CDL drivers.

A Brief History about HP Hood

1846

Harvey Perley (HP) Hood



175 YEARS YOUNG!

Delicious Dairy Products!



Objectives:

- Gain an understanding of the importance of collaborating with others outside of EHS
- Attendees will learn examples of where EHS partners with others outside of EHS circles
- Attendees will benefit from open discussion & interaction with other employees during the presentation



?Supplemental Duties for EHS Pros?

- Drug & Alcohol Testing
- Workers' Compensation
- DOT Fleet Safety Issues
- Facility/Maintenance Duties
- Environmental Duties
 - Environmental Sustainability
 - Corp Social Responsibility



**COLLABORATING
PARTNERING
INSPIRING
LEADING
LEARNING**



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Example – Sustainability & CSR

- Sustainability = People, Planet, Profit
- CSR = Corporate Social Responsibility
- A big issue in the “Food & Beverage Industry”
- Customer-Supplier relationships are meaningful
- Sustainability/CSR/“Ethical Sourcing Audits” have become the norm for the F&B sector
- Interface with Sales, Customers, Execs + HR



Sustainability/CSR Auditing

**YES, IT IS TIME
CONSUMING**

- **It's serious business!**
- **HR team owners/Ops partnership**
- **Audit proceedings involve:**
 - **Administrative recordkeeping**
 - **Site walk (facility inspection)**
 - **Interviews**



**JUST LIKE AN
EHS AUDIT!**

Sedex Advance: Self Assessment Questionnaire

The SEDEX SAQ incorporate up to 250 questions (depending on site activity) across the following five pillars.

1	2	3	4	5
Profile	Labour	Health and safety	Business Ethics	Environment
Audit history	Management Systems	Health & Safety Management	Management Systems	Management systems
Seasonal Variance	Employment is freely chosen	Health and Safety Training	Anti-corruption	Waste
Worker types	Freedom of association...	Emergency & Fire safety		Raw Materials
Site information	Living Accommodation	Machinery & Site Vehicles		Water
Certification and best practice	Children / young workers	Hazardous Materials		Pollution
Applicable laws	Wages	Worker Health		Emissions, including GHGs
Supplier management	Working hours	Housekeeping & Hygiene		Energy
	Non-discrimination			Renewable energy
	Regular Employment			Biodiversity
	Discipline and grievance			Supplier Environmental Impact
	Smallholders			
	Homeworkers			
	Sourcing			

65% HR; 15% Safety; 10% Env; 10% Energy

HR Related Discussion Items

- Turnover rate over past year
- Turnover rate by quarter
- Annual absenteeism rate
- Quarterly absenteeism rate
- % of workers that work more than 48 hrs/week
- % of workers that work more than 60 hrs/week
- The SMETA auditor will select a list of names from approximately 10% of your employees
- HR will need to display the I-9 Forms for each of the employees selected (don't allow copies)

**COLLABORATING
PARTNERING
INSPIRING
LEADING
LEARNING**

I-9's

- Must either have A or B+C. Never A+B+C.
- Best if an internal team does a self-audit.

Employment Eligibility Verification
Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-9
OMB No. 1615-0047
Expires 08/31/2019

Section 2. Employer or Authorized Representative Review and Verification
(Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee's first day of employment. You must physically examine one document from List A OR a combination of one document from List B and one document from List C as listed on the "Lists of Acceptable Documents.")

Employee Info from Section 1: Last Name (Family Name), First Name (Given Name), M.I., Citizenship/Immigration Status

List A (Identity and Employment Authorization) **OR** **List B** (Identity) **AND** **List C** (Employment Authorization)

Document Title, Issuing Authority, Document Number, Expiration Date (if any) (mm/dd/yyyy)

Additional Information

OR Code - Sections 2 & 3
Do Not Write in This Space

Certification: I attest, under penalty of perjury, that (I) have examined the document(s) presented by the above-named employee.

Past Sustainability/CSR Audits

Safety-wise, be ready!

- They'll test eyewash stations
- They'll test emergency lighting
- They'll check for fire extinguisher inspections
- They'll check for fire extinguisher signs
- They'll check for a sign above or on each eyewash



It's a mock OSHA inspection of sorts. Dazzle the auditor, live the credo "always be inspection ready!"

How about first aid kits – check your expiration dates!

Environmental Analysis

(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)

A: Responsible for Environmental issues
(Name and Position):

B: Has the site conducted a risk assessment
on the environmental impact of the site,
including implementation of controls to
reduce identified risks

☐ Yes ☐ No
Details:

C: Does the site have a recognised
environmental system certification such as
ISO 14000 or equivalent?
Please detail.

☐ Yes ☐ No
Details:

D: Does the site have an Environmental
policy?
(For guidance, please see Measurement criteria)

☐ Yes ☐ No
If yes, is it publicly available?

E: If yes, does it address the key impacts from
their operations and their commitment to
improvement?

☐ Yes ☐ No
Details:

F: Does the site have a Biodiversity policy?
(For guidance, please see Measurement criteria)

☐ Yes ☐ No

<p>G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?</p> <p>Please detail.</p> <p><i>(For guidance, please see Measurement criteria)</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details:</p>
<p>H: Have all legally required permits been shown?</p> <p>Please detail.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details:</p>
<p>I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Details:</p>
<p>J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details:</p>

<p>K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Details:</p>
<p>L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Details:</p>
<p>M: Facility has a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows <u>recognised</u> protocols or standards</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Details:</p>
<p>N: Facility has checked that any Sub-Contracting agencies or business partners operating on the premises have appropriate permits and <u>licences</u> and are conducting business in line with environmental expectations of the facility</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Details:</p>

ENVIRONMENTAL ANALYSIS CONTINUED

Usage/Discharge analysis		
Criteria	Previous year: Please state period: _____	Current Year: Please state period: _____
Electricity Usage: <i>Kw/hrs</i>		
Renewable Energy Usage: <i>Kw/hrs</i>		
Gas Usage: <i>Kw/hrs</i>		
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
If Yes , please state result		
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> • • • 	<ul style="list-style-type: none"> • • •

Water Volume Used: (m ³)		
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> • • • 	<ul style="list-style-type: none"> • • •
Water Volume Discharged: (m ³)		
Water Volume Recycled: (m ³)		
Total waste Produced (please state units)		
Total hazardous waste Produced: (please state units)		
Waste to Recycling: (please state units)		
Waste to Landfill: (please state units)		
Waste to other: (please give details and state units)		
Total Product Produced (please state units)		

Environmental Permit Inventory

HP Hood Sacramento Facility Permits										
Permit Type	Permit #	Effective	Expiration	Required Reporting		Permit Type	Permit #	Effective	Expiration	Required
Water						Air Emissions GHG Reporting - 6/1 RMP Reporting- 3/1				
Wastewater Discharge	DAR-001	1/1/2018	12/31/2021	10th of every month		SMAQMD - Boiler 1 Model: CBL 200-300 Serial #: L-93986	20436	12/3/2008		Annual Source Testing
Storm Water (SWRCB)	55341020361			July 1st		SMAQMD - Boiler 2 Model: 7-2-4000 Serial #: 15582	22956	12/13/2011		Annual Source Testing
Pressure Vessels						SMAQMD - Boiler 3 Model: 6-5-4000 Serial #: 13437	20843	6/4/2016		Annual Source Testing
DOSH Operate Steam Boiler (#1-BLRM)	State SER #: B022756-96 N.B.#/SER#: 4239	1/26/2018	1/26/2019			SMAQMD - Air Pollution Control SCR System Model: SCR-69	23007	12/13/2011		Annual Source Testing
DOSH Operate Steam Boiler (#2-BLRM)	State SER #: B026140-15 N.B.#/SER#: 8972	2/22/2018	2/22/2019			SMAQMD - Ink Permit	21343	6/30/2010		ROC Matrix
DOSH Operate Steam Boiler (#3-BLRM)	State SER #: B024227-967 N.B.#/SER#: 13437	5/26/2018	5/26/2019			SMAQMD - Fire Pump Model: NH220-IF Serial #: 31882	20361	7/23/2007		Hour Log
DOSH Operate Air Pressure Tank (COMP/Engine Room)	State SER #: A002703-10 N.B.#/SER#: 617003	10/14/2015	10/14/2020			Chemical Handling, Storage, & Disposal Form R - 6/1				
DOSH Operate Air Pressure Tank (2ND FLR COMP ROOM)	State SER #: A022758-96 N.B.#/SER#: 140799	12/10/2015	10/14/2020			Hazardous Materials 10-15 MATLS	PR0013369 520	7/17/2018	7/18/2019	August 1st
DOSH Operate Air Pressure Tank (QUAD)	State SER #: A025566-12 N.B.#/SER#: 546621	5/15/2012	3/22/2022			Hazardous Waste 2500-7500 GAL	PR0013370 530	7/18/2018	7/19/2019	
Operate Air Pressure Tank (AIR COMP #3)	State SER #: A025564-12 N.B.#/SER#: 469040	3/20/2017	3/20/2022			Above Ground Storage Tank 10,000 and <100,000 GAL	PR0084668 544	7/18/2018	7/18/2019	
Operate Air Pressure Tank (@BOILER #4)	State SER #: A025565-12	5/15/2012	N/A			CalARP Program LVL 3 Annual Pro Activity Fee	PR0026742 531	7/18/2018	7/19/2019	
EHS Chemicals						Haz Waste Small Qty. Generator	GEN ID: CAR0000108 43			August 1st
RMP - Anhydrous Ammonia	EPA Facility ID: 100000100605			FSM- 5/2020 PHA 5/2019 RMP 7/2019		Fire				
						Fire Prevention Permit	2013-8693	5/27/2018	5/27/2019	

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Example – Injury Reduction

- Collaboration at it's best!
- Partnering with employees, supervisors, department managers and senior leaders
- Provide a case history example of one case



DEFENDING THE REDZONE

Engaging the DSD Driver to Reduce Workplace Injuries



Home of Quality Milk
I D E A L D A I R Y



PRESENTATION ELEMENTS:

- Share insight on HP Hood DSD environment
- Discuss the approach to establishing the REDZONE effort
- Share different activities/approaches to REDZONE



**OUR PERSONAL BELIEF:
SAFETY IS NOT PROPRIETARY
(WE ARE WILLING TO SHARE)**



Quick Comment about Structure

- Historically DSD was separate from our plant/warehouse operations
- Now, each plant manager is responsible for the DSD operations at their sites
- The “wall” between the plant and DSD was the size of the wall of Jericho- new structure was the “trumpet” to knock the wall down
- Unfortunately, DSD injuries accounted for approximately 50-60% of the lost time incidents at the sites.

OUR SAFETY CHALLENGES AS A COMPANY:

Business is engaged in local delivery of products and services face unique safety and risk management issues:

1 - At one moment the delivery reps are driving a refrigerated truck on the highway or through congested city traffic, facing all the hazards of the roadway. ✓

2 - The next moment they are handling bulky materials out of the truck, and facing S/S and STF's. ✓

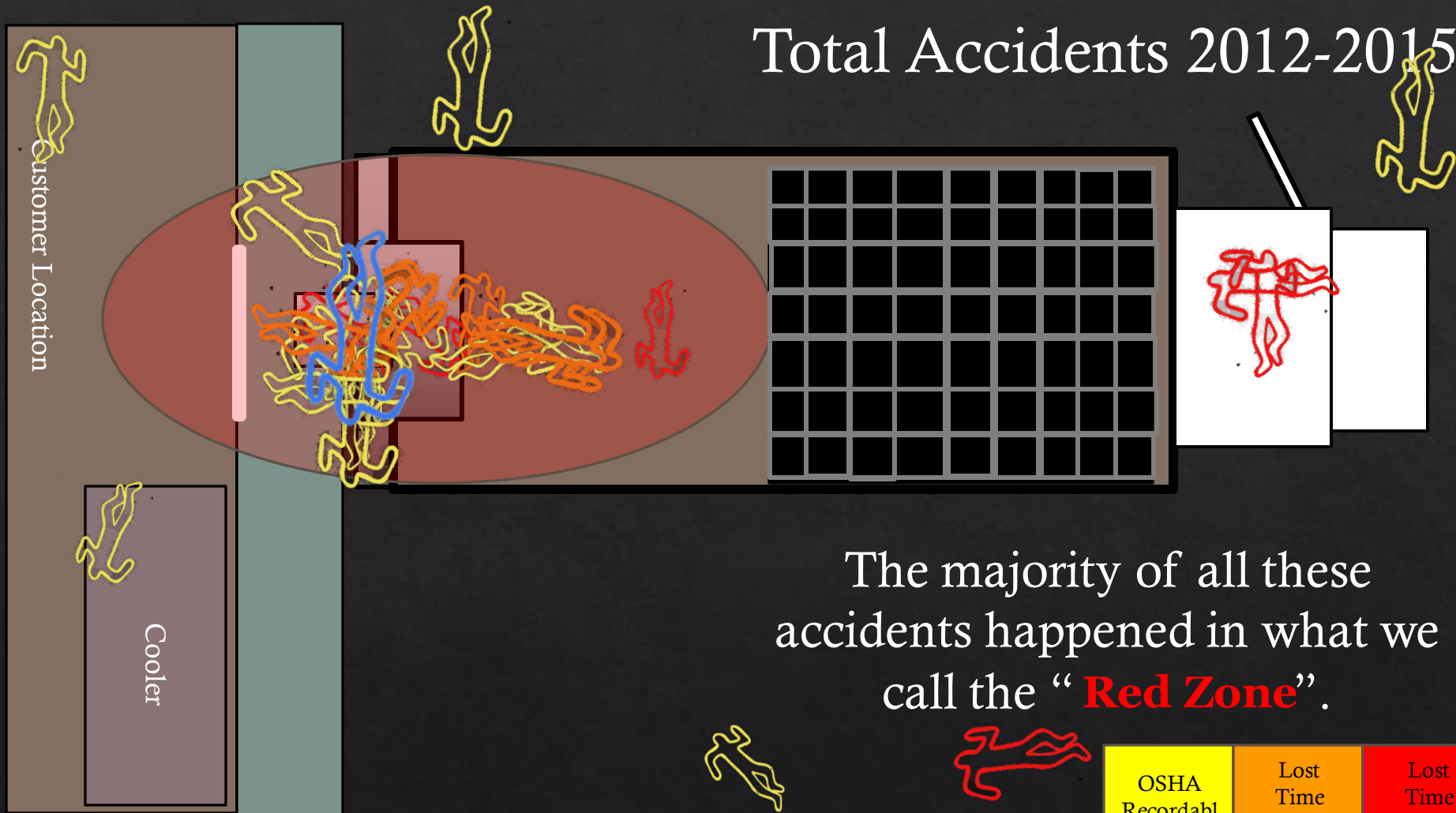
3 - And they are providing services that may involve backing up in a school yard, bringing product up stairs, dealing with congested stock rooms, and many other activities that pose risk of injury. ✓



SOME OF OUR CHALLENGES

- **Supervisor contacts with drivers were inconsistent- more desk, not enough yard/ride along**
- **Had to overcome a long standing mentality of “I just have to deal with it”**
- **EHS professionals were more focused on the plant operations and not putting enough focus/emphasis into the DSD operations**
- **Concern from our sales department that they could possibly lose customers if we were to make changes to make things safer for our drivers**
- **We were going to be asking for a considerable change in the way we approach our safety in the DSD group**

Total Accidents 2012-2015

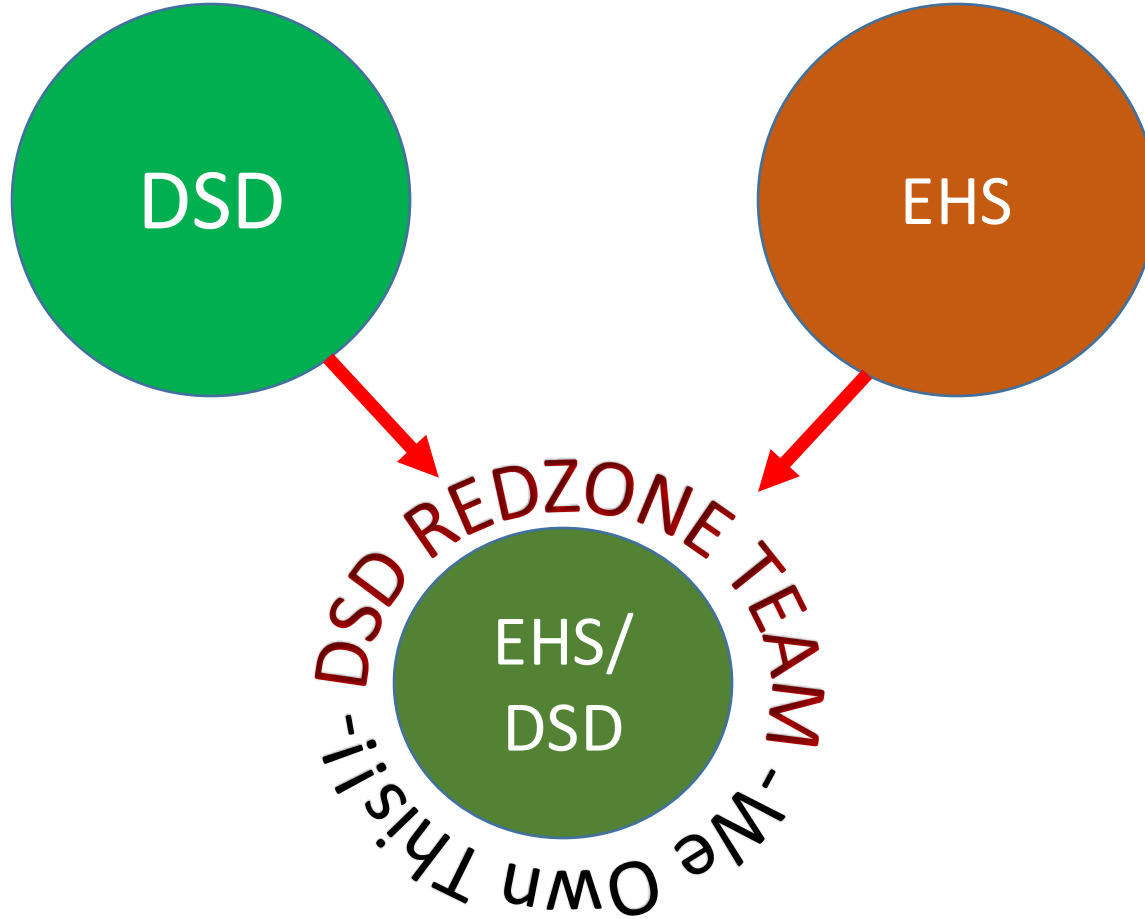


The majority of all these accidents happened in what we call the “**Red Zone**”.

OSHA
Recordable

Lost
Time
< 10 days

Lost
Time
> 10 days



OPERATIONS WOULD BE THE KEY TO SUCCESS!



DSD Supervisor Scott “Lee” Brown
DSD Manager Dave Bertolami

They Asked, We Listened

- **Get Back to Basics**
 - Pointed discussions
 - Engagement
 - Interactive
- **Requests for standard materials for “DSD mini-meetings”**
- **Narrowed focus on key risk areas**
- **The safety TEAM for the DSD group**

DSD REDZONE TEAM - We Own This!



Research showed us four primary areas for injuries

Working the Load

Loading Dock Safety

Transferring the Load

Pinch Points





FOUR PRIMARY REDZONE FOCUS AREAS

- 1. WORKING THE LOAD-** Moving product in the trailer
- 2. LOADING DOCK SAFETY-** Focusing on the challenges when moving the product from the trailer onto the loading dock/ground
- 3. TRANSFERRING THE LOAD-** Moving product on dollies and hand trucks
- 4. PINCH POINTS-** Education and prevention of caught in/between injuries at pinch points.

DSD “REDZONE TEAM”

2016 DSD RED ZONE TEAM

NAME

Dave Cleary

Justin Deflumeri

Don Boutin

Scott “Lee” Brown

Craig Clear

Chuck Donahue

Jason Hyde

Chris Dodd

Remi Fleuette

Scott Brown

HOMETOWN

Portland DSD

Concord EHS

Barre DSD

Concord DSD

Agawam DSD

Albany DSD

Portland EHS

Agawam EHS

FM/IC EHS

FM/IC DSD

DSD “REDZONE TEAM”

2016 DSD REDZONE SCHEDULE

<u>MONTH</u>	<u>OPPONENT</u>
March	Product Transfer
April	Coupling/Uncoupling
May	Pinch Points
June	Dock Safety
July	Pre/Post Trip Inspection
August	Pinch Points
September	Product Transfer
October	Working Load
November	Dock Safety
December	Coupling/Uncoupling

“REDZONE TEAM” Expectations

- Participate on monthly redzone team calls
- Collaborate on ideas for standardized monthly mini meeting emphasis
- Develop monthly interactive activities to help emphasize redzone challenges
- Provide coaching to drivers/supervisors to increase awareness on redzone challenges
- Incorporate emphasis activities into regular ride along programs
- Forge working relationship between DSD and EHS
- Include location report out on monthly emphasis activities during monthly DSD calls



REDZONE TEAM LOCATION ACTIVITIES



Below are activities locations may consider to emphasize the REDZONE safety effort:

FOCUSES ON WORKER SAFETY

- Ride Along- standardized sheet
- Bi-weekly meetings REDZONE Team meetings at locations
- Haunted Trailers- hazards associated with REDZONE- use of injury photos depicting injury events
- Pinch Point Challenges
- Transferring the Load Obstacle Course
- Load Bar Blitz
- Hand Truck blitz
- Cross training between warehouse and DSD- each set up half of a trailer with the challenges that they see in their operation- all drivers and warehouse people walk through to see each other's challenges.
- Boot check with \$1 lotto- if pass, get the ticket, fail-get new boots and then get ticket
- Boot "eviction notice"- coordinate with boot truck visit
- REDZONE shirts- Friday focus effort- all wear the shirts to raise awareness
- Depot involvement in REDZONE activities
- Report only banners showing where injuries/near misses are occurring
- Progressive weight over time visuals

REDZONE BRANDING



We Own This!



DSD REDZONE TEAM

We Own This!



COMMUNICATIONS



REDZONE SAFETY PROCEDURES

Loading Dock Safety



Ensure dock plates are secured



Clear debris before unloading



Watch the gap between the truck and loading dock



Utilize three points of contact when climbing into/out of trailer

Pinch Points



Utilize door handles and straps when closing trailer doors



Use caution when placing and removing load bars



Stacks of products can crush fingers



Keep your body clear when operating tailgates

Working the Load



Lift one case at a time and use two hands to lift cases

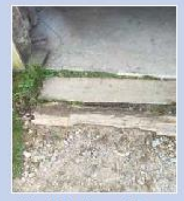


Utilize proper body mechanics

Transferring the Load



Let a falling stack fall



Watch for damaged floors, potholes and uneven surfaces



Stretch to keep muscles warm and loose



Move stacks with a hand truck instead of dragging them across the trailer floor



Red tag damaged equipment



One dolly at a time

Promotion

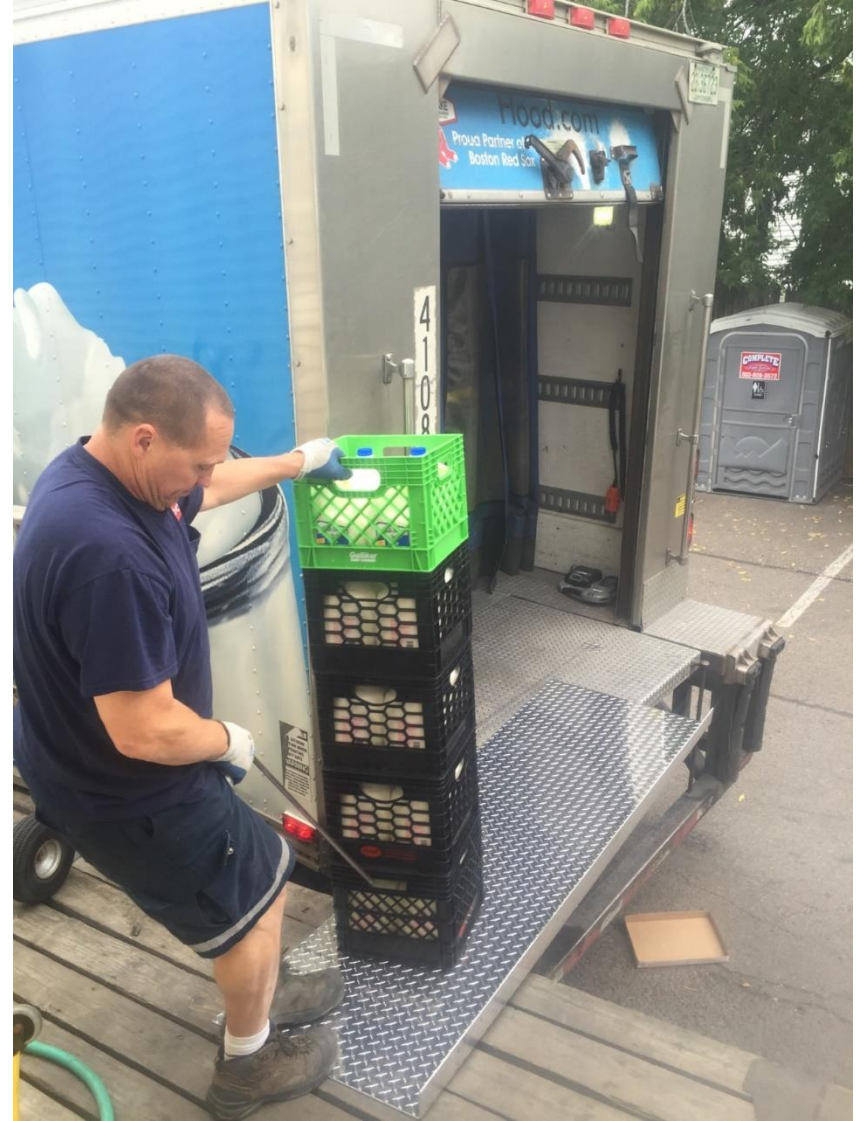


Transferring the load - Activity



- ❧ Conduct during mini-meeting session, at the fuel island, or at the end of the day.
- ❧ Ask each driver to provide the following:
 - ❧ My most difficult stop to deliver is: _____
 - ❧ The load transfer hazards include: _____
 - ❧ _____
 - ❧ My suggestions to improve this stop: _____
 - ❧ _____
 - ❧ _____

Safety Improvements at Customer Locations



Work Stop Authority



IF YOU SEE SOMETHING - SAY SOMETHING



APRIL REDZONE SAFETY TEAM INTERACTIVE EXERCISE

LET'S GET STRAIGHT TO THE PINCH POINT

The interactive activity will be a fuel island/yard inspection activity with pinch points.

Have a discussion with drivers about pinch points and ask them to identify pinch points they experience each day. You can have them point to specific pinch points on the back of the trailer and also ask them if there are any other pinch points they face keeping in mind bossy carts, cases of product, load bars and other potential pinch points inside the trailer. Help identify pinch points the driver may have missed.

Feel free to make a challenge out of it! Track the total number of pinch points each driver identifies and post the scores on your communications boards! A little competition makes for some fun.

Haunted Trailers



Delivery Obstacle Course





RED ZONE SAFETY TRAINING

LOADING DOCK SAFETY



SAFETY
IN ACTION

Stretching “Blitz”

SAFETY
IN ACTION

SAFETY
IN ACTION



***“PROPOSED”* MONTHLY SAFETY EMPHASIS CAMPAIGN for ALL DSD LOCATIONS**

**Monthly theme based approach used to raise awareness with DSD drivers.
Monitor/team on pre-trip inspection with the driver and discuss the theme.**

- **October: Fire Extinguisher blitz + DOT card check**
- **November: Flex-N-Stretch + license/registration card check**
- **December: Snowbrush handout/window + dashboard cleaning**
- **January: License plate/light bulb/lamp wiping/boot check**
- **February: Flex-N-Stretch/window + dashboard cleaning**
- **March: Spring break check/License + DOT card check**
- **April: Strap, door pin and load bar checks**
- **May: Flex-N-Stretch/window + dashboard cleaning**
- **June: Handout cold water/heat stress discussion/boot check**
- **July: License plate/light bulb check/lamp wiping month**
- **Aug: School bus safety notice/”surprise” window + dashboard cleaning**

NOTE: Window + dashboard cleaning is done 4X/year; Flex-N-Stretch is done 3X/year; and the boot check AND license plate/light bulb/lamp cleaning is done 2X/year intentionally!



HP Hood LLC Distribution Team Ride Along Training



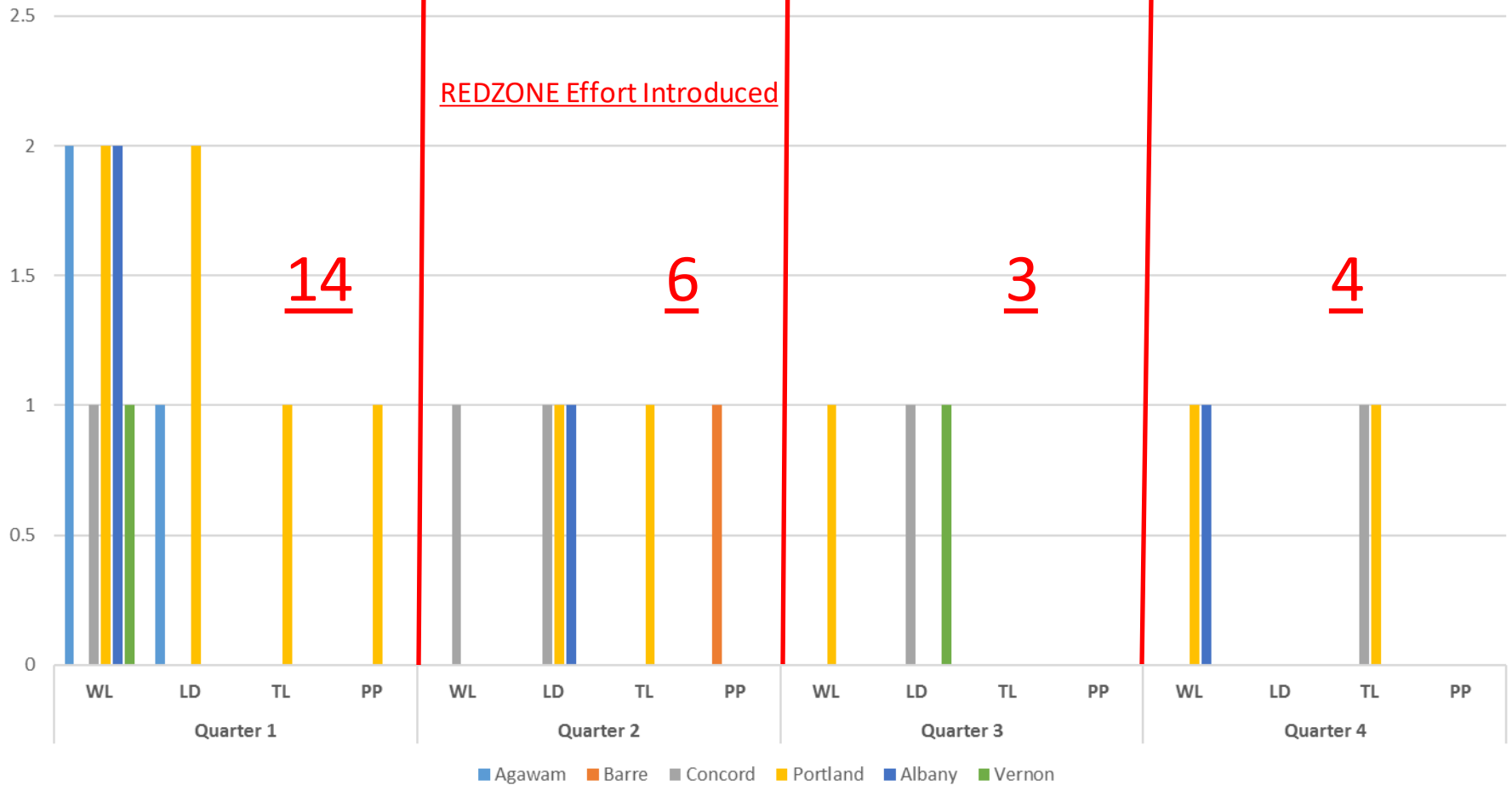
Supervisor Role During a Ride Along

~ How to talk about safety ~

Questions to ask during a ride along

- Do you know why we're doing this ride along?
- Why do you think we're doing this ride along?
- Are there any safety issues with this stop?
- Are there any stairs or dock issues?
- What's the most unsafe customer site you go to?
- What's the most dangerous intersection between here and the next customer stop?

REDZONE Injuries by Location/Type



REDZONE BOX SCORE



2016					
Opponent	Q1	Q2	Q3	Q4	Total
Pinch Points	1	1	0	1	3
Dock Safety	3	3	1	0	7
Transferring Load	1	1	0	1	3
Working the Load	8	1	2	2	13
Dropped trailers	3	0	0	0	3

26

2017					
Opponent	Q1	Q2	Q3	Q4	Total
Pinch Points	0	1	0	1	2
Dock Safety	3	0	1	0	4
Transferring Load	0	1	4	1	6
Working the Load	2	2	1	2	7
Dropped Trailers	1	0	0	0	1

19

“We own this!”

Updated through 12/30/17

26% REDUCTION IN RECORDABLE INJURIES

REDZONE BOX SCORE

2016					
Opponent	Q1	Q2	Q3	Q4	Total
Pinch Points	1	1	0	1	3
Dock Safety	3	3	1	0	7
Transferring Load	1	1	0	1	3
Working the Load	8	1	2	2	13
Dropped trailers	3	0	0	0	3

2019					
Opponent	Q1	Q2	Q3	Q4	Total
Pinch Points	0	0	0	0	0
Dock Safety	2	2	1	1	6
Transferring Load	2	1	0	1	4
Working the Load	2	0	0	2	4
Dropped Trailers	2	1	0	0	3

47% REDUCTION

“We own this!”

OVERALL BENEFITS OF REDZONE EFFORT

- Regular communication with the drivers
- Drivers have been more willing to share difficulties at customer locations
- Developed a more open culture
- Reduction in REDZONE related injuries
- Operations drives the effort with safety support!

Example – MVR Reviews

- Ah ha! Another unique “ask” you may get!
- Partnering with hiring managers and HR professionals to review Motor Vehicle Records (MVRs) for prospective drivers.
- Define the process, outline the steps for the MVR review and what passes/fails



Motor Vehicle Record (MVR) Evaluation Form

Division/State: Agawam, MA
 Date of MVR: 2/17/2020

Applicant Name: xxxxxxxxx
 License #/State: xxxxxxxxx

Is the Candidate's Driver License current and valid?

➡ Yes ☐ No

Is License Clear of citations & suspensions?

➡ Yes ☐ No

ANY CANDIDATE WITH A DRIVING RECORD DEFINED AS A "CONCERNS EXIST" WILL BE REVIEWED BY THE EHS DIRECTOR, HUMAN RESOURCES AND THE LEGAL DEPT



TYPE OF OFFENSE	NUMBER OF CONVICTIONS	POINTS in the last 12	POINTS in the last 36	TOTAL POINTS
Single Offense OUI/DWI in the past 5 years	0			
Double Offense OUI/DWI in the last 10 years	0			
Moving violation 20 MPH or more over posted speed limit	0			
Serious CMV violation or 15-19 MPH over posted speed limit	0			
Moving violation 15-19 MPH in a non-CMV	0			
Moving violation 10-14 MPH in any vehicle	0			
Preventable motor vehicle collision	0			
Moving violation including 9 MPH or less in any vehicle	0			
DESCRIPTION OF OFFENSE/VIOLATION/CITATION	0-12 Months	13-24 Months	25-36 Months	Comments or Notes
Violation(s) [convictions] involving drugs, alcohol, felonies, OUI/DWI, leaving the scene of an accident, failed DOT drug or alcohol test or refusal of any substance abuse test, revocation, suspension, withdrawal or denial of license, transportation, possession, or unlawful use of Schedule I drugs or substances.	Hood will generally disqualify a driver applicant who has been convicted of operating a motor vehicle under the influence of alcohol or drugs within the last 5 years, or twice in the last 10 years.			RECORD CLEAR
Moving violation(s) involving excessive speeding 20 MPH or more over the posted speed limit.	3	3	3	
Violation(s) involving serious traffic violations <u>in a commercial motor vehicle</u> involving excessive speeding (15-19 MPH over the posted speed limit) reckless driving, improper or erratic lane changes, following too closely, driving too endanger, hit and run, leaving the scene of an accident, vehicular assault or homicide, negligent vehicular death and violations of traffic laws which arise in connection with a fatal accident as stated in §263.51.	5	4	3	
Violation(s) in non-commercial vehicle involving excessive speeding (15-19 MPH over the posted speed limit)	4	3	2	
Violation(s), in any vehicle, including exceeding the speed limit by 10-14 MPH	3	2	1	
Preventable motor vehicle collision, in any vehicle.	3	2	1	
Moving violation(s), in any vehicle, including exceeding the speed limit 9 MPH or less	2	1	0	

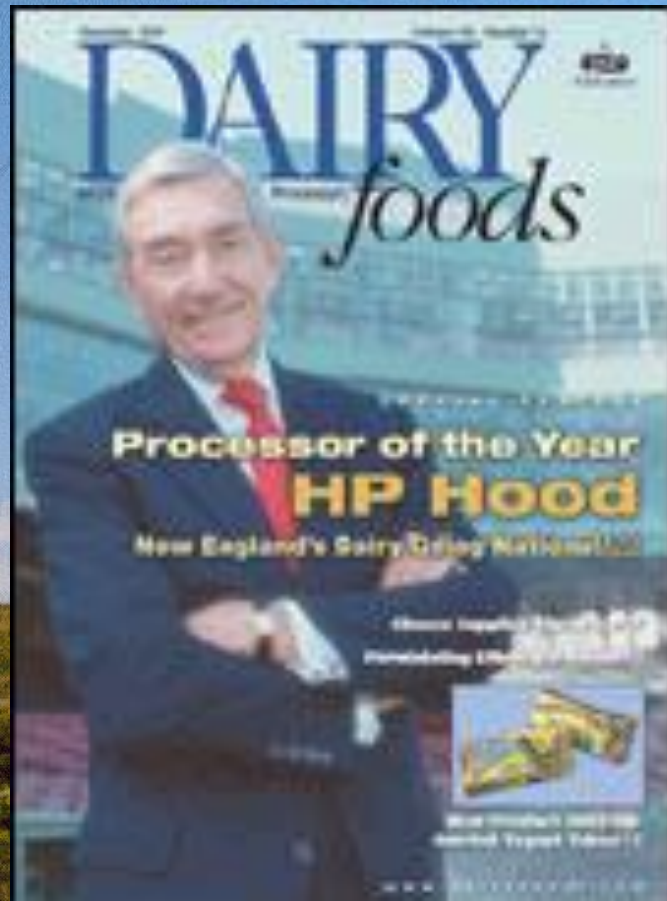
If the candidate has at least (5) points in the past twelve (12) months, or at least seven (7) points in the last thirty-six (36) months, Hood will generally disqualify the applicant for employment. The applicant will be provided an opportunity to demonstrate why the incidents should not be considered disqualifying. The applicant may be employed only with the agreement of Human Resources and the Hood EHS Director.

If the candidate has four (4) points in the last twelve (12) months or six (6) points in the last thirty-six (36) months – then the applicant may be offered employment on a probationary basis. After such a driver has been employed for six (6) months, local management must conduct a supplemental MVR check (ensuring that any forms that must be completed for each new check are properly completed, e.g., the New Hampshire and Pennsylvania Driver-Consent Form). If the supplemental MVR check reveals that the individual has incurred additional points, he or she may be subject to appropriate disciplinary action up to and including termination, and the employee should not be allowed to continue driving until his or her manager has consulted the EHS Director or Human Resources. The local manager, EHS Director, and Human Resources are responsible for following the adverse action steps included in this document any time an MVR report reveals that CONCERNS EXIST.

Example – DOT Clearinghouse

- Ah ha! The newest wrinkle for trucking!
- Partnering with hiring managers and Human Resource professionals to review Motor Vehicle Records (MVRs) for prospective drivers.
- Evaluate new regulatory requirements; define the process, outline the steps and educate!





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