

**Section: Fleet Administration**  
**Subject: Motor Vehicle Record Check**

### **Policy**

In an effort to monitor the safe driving habits of our employees who drive for company business, a Motor Vehicle Record Check policy has been established. Driving is a significant safety exposure for our employees and a serious liability exposure for our company. Minimum standards for acceptable Motor Vehicle Records (MVR) have been established for use in evaluating driving records for current and prospective driving employees. MVRs are checked for the most recent three-year period.

### **Driver Obligation**

Employees driving for company business (“company drivers”) are required to maintain a valid driver’s license for the vehicle they operate and to report to their supervisor all violations occurring while driving on company business or in a company-provided vehicle. Company drivers must immediately notify their supervisors of convictions for DUI/DWI (driving under the influence/driving while intoxicated or equivalent) or other major traffic violations. Also, company drivers must immediately report to their supervisors any changes that may affect their ability to meet the standards of this policy.

### **Current Company Drivers**

#### **Procedure**

- Corporate Risk Management will obtain Motor Vehicle Records (MVR) at least annually for all fleet drivers and employees driving 6,000 reimbursable business miles per year. As appropriate, spouses or domestic partners of fleet car drivers may be included in the MVR check process.
- Corporate Safety and Fleet Administration will review MVRs to identify unacceptable driving records per the Corrective Action Guideline.
- Corporate Safety will notify the manager and Human Resources of the driver(s) who’s MVRs fail to meet the minimum standards and the guidelines for appropriate corrective action.
- The manager and Human Resources will have 30 days to deliver the appropriate corrective action and report back to Corporate Safety as to the outcome of each situation.

### **Fair Credit Reporting Act (“FCRA”) Compliance**

**Current company drivers** must sign the FCRA MVR/Criminal Record Authorization/Disclosure form, which gives The St. Paul authorization to use a consumer-reporting agency to conduct appropriate background/MVR verification.

## **New Hires and Transferring Employees, Reinstatements, and Rehires**

All applicants, whether new hires or transferring employees, for positions that:

- Include a company provided vehicle; or,
- Require driving 6,000 reimbursable business miles for company business in personal vehicles

will be required to provide authorization for a background verification/MVR check post-employment offer.

### **Minimum Driver Selection Standards**

Please refer to the **Corrective Action Guideline** under Motor Vehicle Grading Criteria. No new driver will be hired with a “poor” or “unsatisfactory” MVR.

### **Fair Credit Reporting Act (“FCRA”) Compliance**

For **new hires**, the company application includes a FCRA MVR/Criminal Record Authorization/Disclosure form, which includes an authorization statement that allows utilization of a consumer-reporting agency for MVR checks.

For **transferring employees**, the hiring manager is required to provide the candidate with the “FCRA” form.

## **CORRECTIVE ACTION**

### **Motor Vehicle Record**

Motor Vehicle Records (MVRs) will be examined prior to the start of employment and at least annually thereafter. Any job offer made to a candidate for a position with driving duties shall be contingent upon an MVR meeting the required standards; continued employment in a position with driving duties also requires an MVR meeting the standards within this policy.

The standards to drive a fleet vehicle or for company business are as follows:

1. All operators must have had a valid driver’s license for at least the past three consecutive years.
2. No new driver will be hired with a “poor” or “unsatisfactory” MVR. MVRs will be graded based on the table below, which sets forth the minimum requirements.
3. Driving Records graded other than “clear” will result in disciplinary action depending upon the number of violations and the circumstances.

### Motor Vehicle Grading Criteria (last three years)

Minor Violations	Major Violations
<ul style="list-style-type: none"> <li>• Stop sign and traffic signal offenses</li> <li>• Speeding (varies by zone and state)</li> <li>• Improper turns, failure to signal, failure to yield, improper backing</li> <li>• Seat belt violation</li> <li>• Unsafe lane change</li> <li>• Careless driving</li> <li>• Illegal passing</li> </ul> <p>This is not an all inclusive list/state laws may vary</p>	<ul style="list-style-type: none"> <li>• Driving under influence of alcohol/drugs</li> <li>• Leaving the scene of an accident</li> <li>• Reckless driving / Reckless speeding</li> <li>• Falsifying an accident/ police report</li> <li>• Homicide, manslaughter or assault arising out of the use of a vehicle</li> <li>• Driving while license is suspended/revoked</li> <li>• Attempting to elude a police officer</li> <li>• Criminal vehicular operation</li> </ul> <p>This is not an all inclusive list/state laws may vary</p>

MOTOR VEHICLE GRADING CRITERIA (last three years)	
Number of Minor Violations	Grading Criteria
0-1 Minor Violations	Clear
2 Minor Violations	Borderline
3 Minor Violations	Poor
4 Minor Violations	Unsatisfactory
Any major violation	Unsatisfactory

The St. Paul reserves the right to eliminate any or all of the steps contained in the policy and does not create an entitlement to progressive discipline or a promise that you will be terminated only for cause. Nothing contained herein shall be interpreted as changing the fact that the employment relationship is at will, which means that either you or The St. Paul may terminate the relationship at any time for any reason.