# ANSI Z-15:  The Practical Implications of This Standard

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## Introduction

The ANSI/ASSE Z15.1-2006, *Safe Practices for Motor Vehicle Operations* (henceforth referenced in this document as the standard) is a standard that developed out of a need for guidance from across a wide range of industries.  The standard has been in place for four years and some companies have tried to grapple with how to address it as part of their overall safety efforts.  Some safety professionals are struggling with how to implement the standard at their organizations; however there are some straightforward actions that can be taken to bring to the organization the benefits associated with exercising controls over their fleet operations.

## The History of the Standard

The effort to develop the current by standard was launched in late 1999 and early 2000 by a committee of ASSE.  Previous to that, another organization had proposed to ANSI the concept and undertaken the formation of a working group to develop a standard.  Many years of inaction lead to ANSI moving the standard development to ASSE.

During the first few years, the committee moved slowly to gather both members and resources and gained significant momentum by the March 2005 meeting with a large group in attendance.  The consensus standard was approved on February 15, 2006 and became effective April 28, 2006.  The difficult task of bringing together all the viewpoints so that the standard could be brought to fruition was accomplished by Carmen Daecher who was the Committee Chair.  The final committee had 35 organizations represented that included associations, private sector firms, consulting entities, insurance companies and governmental agencies.

When the standard was published, ASSE engaged in an educational effort to inform the public about the standard and promote its use.  In the subsequent four years, a wide range of organizations have utilized the standard to improve their fleet safety programs.

## Structure of the Standard

The standard was designed to be broad enough to encompass a wide range of fleet types.  Many organizations equate a "fleet" to being comprised of trucks, however this is a misperception and in fact many organizations with only personal passenger vehicles have a higher exposure to loss than trucking companies just given the large number of vehicles that they put on the highways.  The language and complete structure of the standard were intentionally left broad so that any organization could utilize its components in a meaningful manner.

The 31 pages that comprise the standard are broken down into eight different components.  They are as follows:

Component 1:  Scope, Purpose, Applications, Exceptions and Interpretations
This section defines that the standard was put in place to provide guidance on reducing the risk of loss for fleets.

Component 2:  Definitions
Basic definitions to provide a level set for all organizations.

Component 3:  Management, Leadership and Administration
This section outlines the responsibility of management to set forth the policies and procedures to control the operation of their vehicle fleet.  Included are specific areas that should be addressed.

Component 4:  Operational Environment
This section outlines the policies and procedures that should be in place for safe vehicle operations such as distracted driving, road rage and vehicle use.

Component 5:  Driver
This section provides an outline as to what components should be included in the hiring, monitoring and training programs for all drivers.

Component 6:  Vehicle
This section covers specifying vehicles for use, inspecting and maintaining them, and additional equipment.

Component 7:  Incident Reporting and Analysis
This section highlights the important aspects of how collisions and other incidents are reported, investigated and summarized.

Component 8:  Appendices
Samples of various policies and procedures are included as a reference point for organizations that need to develop them for their use.

In addition to providing the actual language of the standard, explanatory information is provided alongside the text to clarify and provide examples. This explanatory material is meant to provide some additional guidance but is not actually part of the standard itself.

Each section of the standard provides for wide latitude in how an organization might comply and leaves it up the organization itself as to what criteria might be engaged. One example is in the area of completing background checks. Section 5.1.3 highlights that there should be a process in place to perform background checks including the motor vehicle record of the driver. The explanatory material highlights several areas of consideration including number of moving violations or previous incidents. However, neither the standard nor the explanatory comments outline how many or of what type of previous incidents should disqualify a driver. In this way the standard provides an overall guideline without restricting its use in any particular manner. The obvious tradeoff is that the organization needs to provide the definition of each of the content areas in a way that controls the exposure and provides protections.

## Misconceptions That Have Developed

Several general misconceptions have developed after the adoption of the standard. As companies have worked to try and define the requirements in their own terms and implement the elements, some common points have repeatedly been brought up as impediments to adoption.

The first and most common misconception is that this standard is now a law that must be followed and adhered to or the organization will be subject to fines, penalties or sanctions. When envisioned and developed, the standard was designed to serve as a guideline for organizations with a fleet. The forward of the standard, in fact, even states that it is not intended for the use of governmental agencies.

Another misconception that has been promoted, is that a fleet safety program can be "certified" by ANZI Z15 and through it that the program has met the necessary requirements. Additionally, some consultants are stating that their work product is "certified" by ANZI Z15 or that they are themselves "certified" to be auditing the program elements. In actuality, the standard explicitly states that they do not in any manner certify anyone, device or activity. This type of promotion dilutes the effectiveness of the standard to provide a framework for organizations to work within.

Lastly, some organizations feel that if they adopt the use of the standard they will be put into a compromised position should an incident occur and incur liability. There are several broad legal fault doctrines that are associated with fleet operations; negligent hiring and retention, negligent training, negligent entrustment, negligent supervision and owner liability. The responsibility under these doctrines are with an organization regardless of whether they have a fleet safety effort in place as would be found under the standard. By addressing the exposure and putting controls into place the impact of liability losses on an organization can be reduced. The effort and discipline toward compliance with the standard will generally be viewed in a positive light, even if all the elements are not perfectly in place, verses taking no action at all.

While there are other misconceptions about the intent or content of the standard, the preceding discussion addressed some major areas.  Organizational representatives are encouraged to obtain a copy of the standard and read it thoroughly to ascertain the applicability to their own situation and not to rely on second party representations.

## How the Standard Could be Used in the Future

The future use of the standard is currently the topic of a great deal of debate in some circles.  What is emerging is that there are three major areas of potential concern as the standard is used.

The first area is that of litigation.  Several law firms and individual lawyers are promoting the use of the standard as a minimum set of requirements.  This is obviously to provide for potential litigation against companies that do not provide for controls over their fleet operations.  The standard will likely be used more extensively by the legal system as both plaintiffs and defendants look for resources to bolster their arguments.

While the standard is not currently being used by OSHA many individuals feel that the potential exists.  Motor vehicle safety was recognized by OSHA in the 1990's as a top concern due to it being the number one cause of workplace fatalities.  This concern for highway fatalities continues today, however, the actual rulemaking process has become stalled.  As the ANSI Z15 standard is a consensus standard, the potential exists for it to be used as a basis for a new OSHA standard even though the ANSI Z15 standard clearly states it is not for that use.

The basic requirements that this standard lays out will assist organizations to reduce the potential for losses due to motor vehicle incidents in addition to reducing the potential for liability exposure and potential future regulatory actions.  These are all powerful arguments for safety professionals to adopt the standard into their organizations operations.

## How to Implement the Program's Elements

As an organization looks to implement a program based on the standard, there are several key steps to follow:

1. **Obtain a copy of standard**:  Copies of the standard are available from ASSE or ANSI as either a hardcopy or as an electronic download.  It is important to have the actual language of the standard and not to rely on interpretations that can be found in abundance on the web.

2. **Review the standard with management**: The organization's management group, including legal council, should be aware of the elements of the standard and the potential impact that compliance will have on the organization.

3. **Audit your current fleet program**: A thorough audit should be conducted of the organization's current programming elements against those identified in the standard.  Because the standard provides a framework and is written in very broad language, an individual with specific knowledge in the area of fleet safety would be an important resource whether they are an internal resource or external consultant.

4.  **Address program deficiencies:** Any areas identified in the audit phase that present opportunities for improvement should be addressed.  Some elements will take time to implement, like initiating a training program.  All elements, whether they can be addressed immediately or will be implemented over time, should be tracked and monitored.

5. **Periodically review program**: Any safety and health program needs to be periodically reviewed and audited to ensure that it remains relevant and effective.  A yearly review will help ensure that the external exposures facing the organization (i.e. regulatory, legal environment, technology, etc.) are taken into account and potential alterations to the program are examined.  An audit should also be undertaken to determine if the program is operating as intended and that the intended results are being obtained.

Implementing a program of compliance to the standard is similar to any other safety and health program element.  The key to implementing the ANSI Z15 standard is having a clear understanding of what content would normally be targeted for each element.

## Auditing Against the Program Elements

The key element to successfully utilizing the standard to minimize risk and losses at an organization is the auditing of the program.  If the audit is conducted in a manner that is not thorough or lacks the necessary depth of review, the entire compliance effort will be compromised.

A number of organizations have tried to perform a cursory audit of their program and fleet safety efforts and have experienced difficulties after the fact.  As the standard is written as a framework, it is not always straightforward to access whether a component is being adequately addressed.  An example would be fond under section 6.1, Vehicle Acquisition.  The standard simply states that it should be based on the activities to be performed.  This one area can require an auditor to review the wide range of activities that the employees perform, are there deviations or normal exceptions, how often, to what degree, etc.  The research and thought process that takes place to determine what is a reasonable vehicle choice in this instance should all be recorded for documentation.

An audit process that is successful will allow all parties to review each aspect and the thought process involved and follows the logic trail.  One of the most effective ways to accomplish this is through a compliance matrix.  The matrix lists:

1.  Each component of the standard
2.  What the current program elements are
3.  The amount of compliance that is currently in place
4.  What the expected range of compliance options are
5.  Reasoning to reach a recommendation
6.  Recommendations

A simple and efficient tool to create a matrix is an excel spreadsheet.  Some organizations already use or will create a large linked database to pull all the knowledge elements together.  If this approach is already being used, the compliance effort for this standard can fit easily into an overall compliance effort.  However, the creation of a complex tool could potentially distract from the effort of compliance.  Creating a process that is disciplined and is documented so that all the stakeholders are able to determine where the organization's compliance efforts currently are, what the proposed changes are and why the change is being recommended will give the organization an effective means of positive change.

## Conclusion

The ANSI/ASSE Z15.1-2006 Safe Practices for Motor Vehicle Operations standard offers the safety professional a means to provide structure and a defined framework around which to build an effective fleet safety program; a program that can not only reduce losses to life and property, but also reduce an organizations external liability and potential regulatory exposures.  Effective implementation is best accomplished with a disciplined approach that includes a comprehensive audit and integrally includes the management group.