**CSEP Performance and Project Award Scoring**

**Performance Standards and Project Award Levels**

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1. **CSEP Participation and Award Levels Overview**

Minimum CSEP performance requirements and ethical standards have been established by the CSEP Advisory Board and must be adhered to by the participants and other stakeholders. CSEP Participants must first meet the minimum or Basic CSEP performance level and then may challenge themselves to achieve CSEP Project Award compliance status on one, or all, of their projects. Project owners may, and are encouraged to, participate in the CSEP when represented by a CSEP participant. CSEP awards and recognition are based on individual project performance. After a Participant meets the basic CSEP requirements, individual CSEP projects are eligible for silver, gold or platinum annual awards based on the performance standards established by the Board. Project Owners may “opt-in” to receive dual recognition for their part in supporting stormwater permit compliance on their project(s).

The CSEP Advisory Board has approved the following performance and award levels for companies and projects participating in the program.

1. **Monthly Project Performance Levels**
	1. **Basic CSEP (Minimum Participation Performance)**

**Status is achieved when:**

1. Participant Executive has signed the annual CSEP Corporate Commitment letter, adopts the USMS compliance methodology, and renews the CSEP commitment letter at least annually, and
2. Participant Executive utilizes CSEP standard (or more stringent) automatic email compliance performance notifications based on the Intermediate CSEP performance expectations, and
3. Participant Executive reviews project CSEP performance summary scores in the CWT online database at least once per month, and
4. At all times at least one AGC/C USMS Certified SWMP/SWPPP Administrator will be assigned to, and be responsible for, Construction General Permit (CGP) compliance on every permitted project, and
5. Participant assures that all projects permitted under the CGP are registered in the CSEP and submit to monthly CSEP audits by a Board approved Construction Reviewer (CR), and
6. Participant has not been found by the Board to have violated any CSEP ethical policies during the program calendar year

**New Participant Companies**

New participant companies entering the CSEP for the first time will have a sixty-day (60) grace period to provide USMS training for their project SWMP Administrators and to implement the USMS process on their projects. During the grace period, projects must participate in the CSEP monthly audits but project months during the grace period are not eligible for, and do not contribute to, project awards. The grace period is optional and may be declined by the participant for any entire program month of results. When the grace period is declined, all results for all projects audited during the program month will be entered into the official performance and award calculations.

* 1. **Intermediate CSEP**

**Status is achieved for each active project when, for any program calendar month:**

1. Participant Company maintains the “Basic CSEP” participation requirements, and
2. CR documented Project E-Impact score calculated with all “open” or “in progress” findings remains at or below ten (10), and
3. Average time to close or address all CR documented New Severe Findings (E-Impact > 2) doesn’t exceed 36 hours, (1.5) days, (“Severe” findings reflect that an offsite discharge has been observed), and
4. Average time to close or address all CR documented New Findings does not exceed 72 hours, (3) days, and
5. Maximum time to close or address any New findings does not exceed 240 hours, (10) days, and
6. Maximum time to close or address any New Severe findings does not exceed 60 hours, (2.5) days, and
7. USMS Implementation Score is at or above 75.0%
	1. **Advanced CSEP**

**Status is achieved for each active project when, for any program calendar month:**

1. Participant company maintains the “Basic CSEP” participation requirements, and
2. CR documented Project E-Impact score calculated with all “open” or “in progress” findings remains at or below six (6), and
3. Average time to close or address all CR documented New Severe Findings (E-Impact > 2) doesn’t exceed 24 hours, (1) day, (“Severe” findings reflect that an offsite discharge has been observed), and
4. Average project correction time for all CR documented New findings on the project does not exceed 48 hours (2) days, and
5. Maximum time to address any New findings does not exceed 144 hours (6) days, and
6. Maximum time to address any New Severe findings does not exceed 24 hours (1 day), and
7. USMS implementation Score is at or above 87.5%
8. **CSEP Active Project - Annual Award Levels**

When participant companies maintain the minimum or Basic CSEP participation standards on all projects, individual active projects and project owners can be recognized for their superior performance at the following Annual Award levels:

**Note:** Basic CSEP performance levels and compliance with the CGP must always be maintained regardless of construction activity level.

* 1. **Platinum CSEP Project**

**Status is achieved when a participant’s active project maintains Advanced performance for all eligible months of the program calendar year (See note below on partial year participants).**

* 1. **Gold CSEP Project**

**Status is achieved when a participant’s active project maintains twice as many months at the Advanced performance level than at the Intermediate level for all eligible months recorded in the program calendar year.**

* 1. **Silver CSEP Project**

**Status is achieved when a participant’s active project maintains more months at the Advanced performance level than the Intermediate level for all eligible months recorded in the program calendar year. (Note: One “Grace” month is allowed where only the Basic compliance level is achieved. Example; 6 mos Advanced, 5 mos Intermediate, 1 mos Basic)**

**Eligible Months:** Projects that are inactive, as defined by the Construction General Permit, may not be eligible for annual awards even though the CGP is still open. CSEP Project Awards can only be achieved on active projects that participate for at least three (3) months in the program calendar year and maintain at least Advanced or Intermediate performance during the program calendar year. Any months of active project performance data that are not used for award levels in the current program calendar year will be added to the performance data for the next program calendar year.

*Example: if the program calendar year is January 1 to December 31, and a two-year-long project starts active construction in the middle of October, the project will have fourteen (14) months of performance data taken into account for project award levels in the first program calendar year, and will have ten (10) months of performance data in the second program calendar year.*

1. **CSEP Performance Scoring Methodologies**
	1. **Definitions and Terminology**
		1. **Finding Correction Status**

**Open** - No action has been taken. Finding still indicates permit non-compliance. **Finding still affects scoring**

**In-Progress** - Some action has been taken to bring the finding into permit compliance, but management practice implementation or maintenance does not yet meet permit requirements. **Finding still affects scoring.**

*Examples:*

*A silt fence is in the process of being installed.*

*Material has been ordered to repair a BMP. The order and expected delivery date have been documented.*

**Addressed** - Temporary measures have been physically implemented and/or documented; management practice requires additional attention before finding can be closed. Finding is temporarily satisfied and **no longer has an effect on scoring**

*Examples:*

*Seed and mulch were lacking in an area of soil disturbance as called for in the SWMP/SWPPP. Seasonal conditions would not likely result in successful seed application or germination. The disturbance area that cannot receive seed application has been fully documented on the SWMP/SWPPP site map along with a written explanation of why the seeding is being delayed and what Temporary BMPs have been implemented to prevent sediment discharge from the site. Temporary sediment control BMPs have been implemented to prevent sediment discharges and have been documented on the site map and the SWMP/SWPPP narrative. The Finding remains active and appears on future audit reports until fully resolved but does not affect the performance scores*

*An engineered sediment pond failed to operate as originally intended and discharged sediment after a storm event. Due to contract obligations, the sediment pond must be redesigned by the civil engineer of record which may take a few weeks or longer. The SWMP/SWPPP Administrator documented the failure of the BMP in the inspection report and the resulting discharge. The discharge of sediment was cleaned up to the best of the contractor’s ability and such efforts were documented in a separate written attachment to the weekly inspection report. A copy of RFI notifying the Owner and Engineer of the failing pond was also attached to the inspection records including a notice that temporary BMPs must be implemented until a final pond redesign solution has been determined. Temporary upstream BMPs to control sediment were implemented and documented immediately in the SWMP/SWPPP narrative and on the site map to meet permit requirements until the final engineered pond corrections are completed and implemented.*

**Closed** - Management practices have been properly implemented or maintained per the permit requirements. **Finding no longer has an impact on scoring**

* + 1. **CSEP Measurement Criteria**

**New Findings** = The number of findings that were discovered on the most recent CR inspection.

**New Severe Findings** = The number of findings with a severity rating greater than 2 that were discovered on the most recent CR inspection.

**Carry Over Findings** = The number of “Open” or “In Progress” findings that were carried over from previous inspections and were still unresolved at the time of the most recent CR inspection.

**Carry Over Severe Findings** = The number of “Open” or “in Progress” findings with a severity rating greater than 2 that were carried over from previous inspections and were still unresolved at the time of the most recent CR inspection.

**Findings** = Sum of **New Findings** and **Carry Over Findings**

**Severe Findings** = Sum of **New Severe Findings** and **Carry Over Severe Findings**

**Open Findings** = Number of **Findings** that are currently unresolved.

**Open Severe Findings** = Number of **Severe Findings** that are currently unresolved.

**Average Time to Address New Findings** = Average time it has taken for a **New Finding** to be **Addressed** or **Closed**.

**Average Time to Address New Severe Findings** = Average time it has taken for a **New Severe Finding** to be **Addressed** or **Closed**.

**Maximum Time to Address New Findings** = Maximum time it has taken for a New Finding to be Addressed or Closed.

**Maximum Time to Address New Severe Findings** = Maximum time it has taken for a New Severe Finding to be Addressed or Closed.

**E-Impact** = Sum of all the weighted severity ratings for **Findings**.

**USMS Percent Implementation** = Uniform Stormwater Management System (USMS) utilization on the project. Measures 12 USMS components for general implementation status “Full” = 0; “Partial” = 1; “None” = 2. Best score is 0 or 100% “Full” implementation. Worst score is 24 or 0%, no implementation

* + 1. **E-Impact Scoring**

Construction Reviewers (CR) will utilize the CSEP inspection software and database to evaluate all aspects of CGP compliance during monthly project audits. CRs will compile a report consisting of Findings and/or Recommendations based on documentation and field observations at the “point-in-time” of the monthly audit. Findings will each be evaluated and scored as to their potential environmental impact (E-Impact) based on the table shown in Attachment B (below).

The E-Impact score for the active project will be the sum of all the new finding E-Impact scores during the monthly audit period and carryover open or in progress.

* + 1. **Average Correction Time**

The CR will document the date and time each finding was discovered which will be entered into the CSEP database along with a photo (in most cases) of the finding. Participants will have the opportunity to correct findings immediately during the inspection or at a later time after the CR has left the project. All findings, even when corrected immediately by the participant, must still be documented by the CR in the monthly report. The CR may document the status of any immediately corrected findings before leaving the jobsite and may enter such information at the time the CR audit report is entered in the CSEP database.

Participants will also be able to enter corrective responses into the database immediately after the audit report is completed and made available to them. Response time is calculated as the difference between the recorded time that each finding is discovered by the CR and the time and date when the participant documents an approved corrective action. A correction response is considered approved when it satisfies the permit requirements and when the CR enters an E-Impact score of zero into the database for the finding.

Time and date information is typically embedded in the digital photo file information automatically by most digital cameras. In the cases where no photo exists for the finding, or where the system detects a discrepancy in the camera time-date information in the photo file, the finding date and time can be established by the CR and entered manually into the system. Otherwise, the software will default to the time and date that the participant response documentation was entered into the database.

Participant response time is temporarily recorded pending CR approval of the response documentation for each finding. Should a finding response be rejected or be deemed to not satisfy the permit requirements by the CR, the time-clock will re-calculate response time back to time of the initial inspection as if no correction had yet been entered. **The participant must enter a satisfactory photo for CR off-site evaluation that clearly conveys to the CR that the finding is indeed corrected. Photos that do not provide complete information to the CR may cause a rejection and an increase in corrective action time.** The CR will notify the participant of the rejected corrective actions as soon as possible, immediately in most cases. The participant will again have the opportunity to enter another response into the CSEP database for re-assessment by the CR.

To calculate the Average Correction Time, the accumulated time for each CR approved finding response is added together for all findings for the project during the monthly audit cycle and is divided by the number of findings recorded during that period. The maximum corrective action time allowed for any single finding is 28 days. Therefore, the worst possible Average Correction Time for a project would be 28 days if no findings were corrected. Uncorrected findings will be automatically transferred to the next CR monthly audit report for CR re-evaluation and the correction response time-clock will re-start to the time and date of the start of the next initial inspection.

* + 1. **USMS Implementation Percentage**

The CSEP is an Environmental Management System based (EMS-based) program intended to continuously improve a Participant’s federal, state and local environmental permit compliance proficiency. The Uniform Stormwater Management System (USMS) is the standardized compliance methodology and training adopted by the CSEP Board to provide Participants with all systems and tools needed to achieve consistent Construction General Permit (CGP) compliance and continuous performance improvements. It is generally agreed by all CSEP stakeholders that the higher the percentage of USMS implementation achieved on the jobsite, the higher the level compliance will be with the CGP requirements.

USMS implementation percentages are determined by the CR during each CR monthly audit by evaluating the Participant’s USMS implementation using the 12 item checklist (see below). Each checklist item reflects a major component of the overall USMS. Each item is given a score of zero, one, or two, by the CR based on its level of implementation. A zero (0) reflects full USMS implementation of the item; a one (1) reflects partial implementation; a two (2) reflects no implementation. The total points possible for a project during each monthly audit are 24, which would reflect no implementation of the USMS and a USMS Percentage Score of 0%.

See Tables below for USMS scores and associated implementation percentages.

**Attachment A**

**USMS Implementation Audit**

***USMS Monthly Scores & Implementation Percentages***

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 0 | 100.00% |  | 9 | 62.50% |  | 18 | 25.00% |
| 1 | 95.83% |  | 10 | 58.33% |  | 19 | 20.83% |
| 2 | 91.67% |  | 11 | 54.16% |  | 20 | 16.67% |
| 3 | 87.50% |  | 12 | 50.0% |  | 21 | 12.50% |
| 4 | 83.33% |  | 13 | 45.83% |  | 22 | 8.33% |
| 5 | 79.16% |  | 14 | 41.67% |  | 23 | 4.16% |
| 6 | 75.00% |  | 15 | 37.50% |  | 24 | 0.00% |
| 7 | 71.83% |  | 16 | 33.33% |  |  |  |
| 8 | 66.67% |  | 17 | 29.16% |  |  |  |

**USMS Audit Implementation Questions**

|  |  |
| --- | --- |
| **1** | **Does the SWMP/SWPPP Manager hold current certification in the USMS Advanced Stormwater Manager course?** |
|  |
| **2** | **Is the SWMP/SWPPP documentation organized per the USMS guidelines? (See USMS Binder Table of Contents)** |
|  |   |  |   |   |   |   |   |   |
| **3** | **Has the USMS Documentation Checklist been utilized by the current SWMP/SWPPP Manager per the USMS guidelines?** |
|  |   |   |   |   |   |   |   |
| **4** | **Is there a narrative/detail and USMS log sheet fully completed for every BMP?** |
|  |
| **5** | **Is there a narrative and USMS log sheet fully completed for each pollution source?** |
|  |   |   |   |   |   |   |   |
| **6** | **Are unique identifiers being used to identify and locate BMP's and PS's and any other required items on the Master Site Map per USMS guidelines?** |
|  |  |  |  |  |  |  |  |  |
| **7** | **Have the USMS inspection frequency requirements been met by the SWMP/SWPPP Manager since the last CR Inspection?** |
|  |  |  |  |  |  |  |  |  |
| **8** | **Has the USMS pre-planning tool been utilized properly since the last CR Inspection?** |
|  |  |  |  |  |  |  |  |  |
| **9** | **Are BMP's and PS's, and any other required items, on the USMS 'working copy' site map being checked off during inspections by SWMP/SWPPP Manager?** |
|  |
| **10** | **Based on CAL documentation, are Participant Corrective Action items being addressed in a timely manner?** |
|  |  |  |  |  |  |  |  |  |
| **11** | **Is the Master Site Map being updated per USMS guidelines?** |
|  |
| **12** | **Have the USMS Daily Logs been filled out properly?** |

**Attachment B**

**E-Impact** **INSPECTION SCORING**

|  |  |  |
| --- | --- | --- |
| **E-Impact Number** | **E-Impact Weighted Score** | **Inspection – E-Impact Scoring Criteria** |
| **1** | **0.25** | Item is not compliant with permit requirements; minor (but required) BMP maintenance items; **little or no risk for discharge to the environment.** Examples: Documentation item is missing such as a minor SWMP update; Silt fence is torn at the top but functional.  |
| **2** | **2** | Item is not compliant with permit requirements; lacking maintenance on, or implementation of a BMP indicated in the SWMP that **will likely result in a preventable discharge from the project during the next runoff event.** Example: A BMP noted in SWMP is not implemented and is needed to prevent discharges, or, poor maintenance/installation of BMP that will likely result in a discharge.  |
| **3** | **5** | **A preventable discharge HAS occurred outside of the permitted boundary of the site but CAN be remedied if immediate action is taken.**Example: Mud tracking onto streets, but, caught before the next wet weather event and cleaned up. |
| **4** | **15** | **A preventable discharge HAS occurred outside of the permitted boundary of the site and can NOT be easily remedied. Pollutants have been discharged into an enclosed MS4 or State Water.** Examples: Mud tracking onto the street and subsequently washed into the MS4 or State Water. Concrete wash water entering a storm inlet. Soil amendment leachate allowed into the surface water stream and has discharged from the site. |
| **5** | **30** | **A preventable discharge HAS occurred outside of the permitted boundary of the site and CANNOT be easily remedied. Pollutants (including sediment) have been discharged into an enclosed MS4 leading directly to a protected water of the US or have been discharged directly into protected State Waters.** Examples: Same as a 4 point observation above, but impacts any waterway designated as “at risk” or “wetlands” or containing endangered species.  |