

# OSHA's VPP

## *The value of participating*

*By Brian Bennett and Norman Deitch*

CREATED IN 1982, OSHA's Voluntary Protection Programs (VPP) recognize and partner with worksites that demonstrate excellence in safety and health. VPP sites are committed to effective employee protection beyond the minimum requirements of OSHA standards. VPP employers that qualify "generally view OSHA standards as a minimum level of safety and health performance and set their own more stringent standards where necessary for effective employee protection" (OSHA, 2000). VPP participants develop and implement systems to effectively identify, evaluate, prevent and control occupational hazards to prevent employee injury and illness. All types of workplaces, including federal agencies, are eligible to join the VPP.

Participation in the VPP does not eliminate the rights or responsibilities of employers or employees under the OSH Act. OSHA enforcement inspections will result from formal complaints, workplace accidents or fatalities, chemical leaks and spills, and other significant events. However, to demonstrate the cooperative nature of the VPP, OSHA removes VPP participants from programmed inspection lists, and does not issue citations for standards violations observed during the scheduled on-site evaluations that are promptly corrected.

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VPP participants must meet the following three general requirements:

1) **An effective, ongoing safety and health process.** This process must involve all levels of employees. VPP worksites are expected to have a safety and health process that addresses workplace hazards, and in some cases exceeds the minimum requirements of OSHA standards.

2) **Cooperation.** VPP emphasizes cooperation and trust between the three key players in worksite safety and health—management, labor and OSHA. The high level of cooperation found at VPP worksites complements OSHA's regulatory efforts.

3) **Good performance.** The safety and health management system is evaluated to ensure that all applicable standards are addressed. Performance, in terms of occupational injury and illness rates, is also evaluated. VPP worksites must maintain injury rates below a certain level in accordance with their level of recognition. Good performance does not stop once the VPP on-site evaluation team has completed its review—continuous improvement is expected.

### **Levels of Recognition**

VPP has three levels of recognition: Merit, Star Demonstration and Star (OSHA, 2003).

Merit recognizes a good worksite safety and health process, but one that does not meet the level required for the highest level of participation for some safety and health elements. Merit worksites' safety and health management systems need some improvement to be judged as excellent. These sites may have some newly implemented processes or procedures, and require time (at least 1 year) to demonstrate their effectiveness. Merit worksites demonstrate the potential and commitment to meet specific safety and health goals necessary to achieve Star quality within 3 years.

This designation also can be assigned to worksites that may have an excellent system in place but whose incident rates are slightly higher than the specific industry rates. Those worksites are given 2 years to achieve sufficient rate reductions to meet the requirements.

Therefore, the Merit level serves as an effective stepping stone to Star. Typically, a Merit site will be assigned one or more goals to be completed within 3 years in order to be elevated to the Star level. Merit sites are typically limited to one 3-year term, unless a second term is approved by the assistant secretary of labor for OSH. These sites receive an on-site reevaluation every 18 to 24 months, and must be able to reduce their injury and illness rates below the national average for their particular industry classification within 3 years.

Star Demonstration is designed for worksites with Star-quality safety and health protection to test alternatives to current Star eligibility and performance requirements. Participants are reevaluated every 12 to 18 months. Examples of worksites that participate in this program include construction and mobile workforces.

The Star level is reserved for the best of the best: exemplary worksites that have a fully functional and effective safety and health management system which has been in place for at least 1 year. Star worksites must also have achieved injury and illness rates below the national average of their industry classification. Star worksites require the highest level of management commitment and employee involvement. Star worksites receive an on-site reevaluation every 3 to 5 years.

### The Four Cornerstones of VPP

The four cornerstones (elements) of the VPP safety and health management system are:

- management commitment and employee involvement;
- workplace analysis;
- hazard prevention and control;
- training.

### Management Commitment & Employee Involvement

The first cornerstone of VPP is management commitment and employee involvement—believed by many to be the most important element of the VPP.

Management must:

- be committed not only to the safety and health process, but to the VPP principles;
- make sure that the appropriate resources in terms of manpower, money and equipment are provided to ensure the highest level of safety and health performance;
- delegate responsibilities for safety and health to the appropriate personnel, and hold them accountable for their performance;
- demonstrate its commitment by actively participating in the process by attending safety meetings, presenting safety and health training, and conducting inspections.

The second part of this cornerstone involves the workforce. All levels of employees in every department within the facility must have the option to actively participate in the safety and health process. This can be accomplished in many ways, including conducting inspections, providing safety and health training, participating on the emergency response team, being a member of a safety and health committee, preparing



Members of the VPP team at Clow Valve Co. in Oskaloosa, IA, celebrate approval as a Merit site in OSHA's Voluntary Protection Programs. The Merit program is an effective stepping stone to Star recognition. Merit sites demonstrate the potential and the commitment to meet goals tailored to each site and to achieve Star quality within 3 years.

or reviewing job hazard analyses and performing incident investigations. Almost any technique used to involve employees in the day-to-day operation of the safety and health process is acceptable, as long as their participation is active and meaningful. Such participation helps to ensure that employees take ownership of the safety and health process.

### Workplace Analysis

Workplace analysis involves the various techniques used to identify hazards present at the worksite. Techniques include job or process hazard analyses, industrial hygiene sampling, management of change procedures, hazard reporting and tracking system, incident investigation, routine inspections, occupational healthcare and reviews of the OSHA logs and other trend analyses of leading indicators.

### Hazard Prevention & Control

Hazard prevention and control is a logical extension of the workplace analysis cornerstone. Once hazards have been identified, a system must be in place to prevent those hazards from occurring, or to control any adverse effects should they occur. Hazard prevention and control typically includes programs such as lockout/tagout, confined space entry, emergency response, bloodborne pathogens, hazard communication and process safety management. The hierarchy of controls used to prevent and control hazards includes engineering controls, administrative procedures and PPE.

### Training

The final VPP cornerstone is training. This element includes all regulatory and job-specific training

**Abstract:** In the Voluntary Protection Programs (VPP), management, labor and OSHA establish cooperative relationships at workplaces that have implemented a comprehensive safety and health management system. Approval into VPP is OSHA's official recognition of the efforts of employers and employees who have achieved exemplary occupational safety and health. This article discusses VPP program basics and benefits, and details steps in the application process.



*All levels of employees must have the option to actively participate in the safety and health process.*

programs which have been implemented to ensure that employees are fully trained and competent to conduct their tasks safely and efficiently. The training program should include all levels of employees in all departments. A comprehensive training program for contractors is also included in this cornerstone. VPP worksites often exceed the minimum regulatory training required by the various standards by including other on- and off-the-job training topics for employees and their families.

#### **Why Participate in the VPP?**

Many employers reason that barring a catastrophe (e.g., the hospitalization of three or more employees), a workplace fatality or an employee complaint, the chance of OSHA conducting a programmed inspection at their facility is slim. So why would an employer voluntarily invite OSHA into its workplace? Is it worth the risk?

#### **Benefits of the VPP**

There are many benefits of participating in the VPP:

- Third-party validation of a site's safety and health processes.** During the evaluation process, the OSHA VPP team will evaluate each element of a safety and health process to ensure that it meets the minimum requirements of both the applicable OSHA standards and VPP. The evaluation team can serve as an impartial, independent auditor, validating the effectiveness of a safety and health process. Unlike some other third-party program verifications, there are no application or certification fees associated with a VPP evaluation.

- No penalty inspection.** One benefit of VPP participation is that if the evaluation team discovers violations of OSHA standards during the evaluation, no citations will be issued. However, the expectation is that corrective actions will be implemented promptly.

- Recognition.** There are only about 1,600 VPP worksites out of the approximately 7 million worksites eligible for participation. This recognition can raise employee morale and help foster acceptance by a facility's community.

- Competitive advantage.** VPP worksites have an edge against competitors. Customers will benefit from lower costs that result from lower injury and accident rates. Quality will be higher, as the same worker will be making the product every day since s/he is less likely to suffer an injury and be away from work. When a customer is evaluating potential suppliers, the VPP may be the only criterion that differentiates one company from another. VPP status can make a company more marketable. Facilities that have been approved as a VPP worksite can use the VPP logo and VPP designation on their products or marketing materials. (However, caution must be used to avoid marketing a company or product as "OSHA approved.")

- Higher employee morale.** Employees who are fully engaged and participate in the safety and health process are more comfortable coming to work, knowing that the chance of being injured or involved in an accident is extremely low. In short, safe workers are happy workers.

- Removal from OSHA's programmed inspection list.** VPP sites are removed from OSHA's programmed and targeted inspection lists. However, as noted, VPP worksites can be inspected in response to an employee complaint or in the event of a catastrophic event. Violations observed during these inspections can result in the issuance of citations and fines, as appropriate.

- Cooperative environment between labor, management and OSHA.** Having a good preexisting labor/management relationship facilitates entry into the VPP. However, achieving VPP status further enhances these relationships because of the openness, inclusiveness, ownership and accountability that exist in VPP worksites. These worksites also enjoy a cooperative and nonconfrontational relationship with OSHA.

#### **The Downside of the VPP**

VPP participation has some recognized actual, potential and perceived downsides. They may include the following:

- Many companies focus on the positive aspects of achieving zero lost workday injury rates (LWDI), whereas the VPP measure days away from work, restricted and transferred incidents (DART). This results in rates that are usually higher than the site's LWDI. The realization that the rate is no longer zero has been hard for some sites to accept.

- Worksites approved for Merit may realize a loss of commitment because of the perceived failure to achieve Star status.

- Union worksites have encountered complications when the labor unions and/or management have placed the VPP on the negotiation table. This can have significant impact, as union support is a basic requirement for VPP participation.

- The VPP add no significant costs to managing safety and health. However, most VPP companies support the Voluntary Protection Programs Participants' Association (VPPPA) and attend its conferences. They also support the principles of the VPP through the special government employee (SGE) and mentoring programs. Although those programs are voluntary, they are expected by OSHA and carry some additional costs.

- Companies may incur additional expenses to meet the requirements of participation and to exceed OSHA standards. One example is purchasing and installing automated electronic defibrillators, although there is no OSHA standard that requires them.

#### **The Business Case for VPP**

Although participation in the VPP has many benefits, most of them are intangible. This makes it difficult to sell the idea to upper management. In one success story, a study was conducted to correlate VPP to the bottom line. In 1996, the author conducted a survey by soliciting interested VPP facilities. Fifteen VPP worksites across various industries in the New York/New Jersey metro area agreed to participate. The purpose of the study was to determine whether the VPP principles were extended to the



business practices of the worksites and, if so, whether this led to increased profitability. The results were extraordinary. Every measurable business indicator was significantly improved once the VPP principles had become ingrained in all aspects of the business.

Each worksite was asked to answer the questions based on its data for a period of 3 years before VPP participation against data from 3 years after VPP participation. The results:

- Workers' compensation insurance costs: reduced approximately 55%.
- Injury/illness rates: decreased by about 70%.
- Absenteeism: decreased from about 6% to 1.5%.
- Quality: Customer complaints due to poor product/package quality decreased approximately 85%.
- Employee participation in all aspects of the business: Approximately 90% of all hourly employees were actively involved in some business-related committee, as compared to less than 10% before the VPP process began.
- Union grievances: decreased an average of 75%.
- Budget performance: 100% of the worksites reported improvements in the actual costs compared to the budgeted costs.
- Profits: 100% of the sites realized increased profits after VPP recognition.
- Accidents/incidents: Worksites saw a 50% decrease in accidents/incidents.
- Employee perception: All worksites reported an improvement in employee perception of the company in terms of whether the facility was a good place to work.

These results can be attributed to the fact that the worksites extended the VPP principles of openness, active and meaningful employee involvement, empowerment and accountability to all employees across all facets of the operation. Each indicator translates directly to increased profitability, which can easily be measured in financial terms.

### Getting Ready to Participate in the VPP

A worksite should not submit a VPP application until a comprehensive, well-established safety and health process is in place that not only complies with OSHA standards, but exceeds them in many areas. However, worksites that are just beginning to develop their safety and health management systems can use the VPP application as a type of gap analysis which can serve as a template for developing an effective system. These sites can then submit an application when they meet at least the Merit requirements. Achieving Merit status would provide the additional motivation to complete worksite goals and ultimately achieve Star status.

Once a site has decided to proceed with the VPP process, a multidisciplinary gap analysis team should be assembled. The team can include employees from all levels, as well as outside resources such as corporate staff, mentors or consultants. The team's primary task is to audit the site's existing policies, programs and processes against the required VPP elements and subelements. The team should then

## VPP Statistics

- In 1982, 11 companies were VPP participants. That number has grown to 1,341.
- VPP sites vary in terms of size, although most sites have fewer than 1,000 workers. There are 489 sites with fewer than 1,000 employees; 162 with 3,000 to 5,000 employees; and 20 sites with more than 40,000 employees.
- 30% of VPP sites are union sites; 70% are nonunion.
- The top three industries in the VPP are chemical (229 sites); electric (150 sites); and trucking and warehousing (142 sites).

*Note. From "Current VPP Statistics," by OSHA, Office of Partnership & Recognition, Sept. 2007.*

create a corrective action plan that lists all shortcomings and assign action items to specific personnel. The team should meet regularly to track the status of corrective actions and lend support when necessary. The gap analysis should be started as soon as possible, since all required elements and subelements must be in place and functional for a minimum of 1 year before Star status can be awarded.

### Application Preparation & Submittal

Once all corrective actions identified in the gap analysis are completed, the site is ready for the next step—writing and submitting the application. Although the application is fairly straightforward, many different approaches can be taken to actually write it. This section will discuss the application and suggest several ways that companies have found success.

The best approach to preparing a VPP application is to create a dialogue with the local OSHA regional VPP manager. S/he can advise what is expected in an application and can provide preferred tools and templates.

Simply described, the VPP application is a comprehensive narrative summary of how the site manages each of the four major elements and each subelement of its safety and health management system. The number of subelements varies depending on a company's specific operations, processes, organization, chemicals used and size. All of the elements and subelements are defined in the VPP application.

Most OSHA regional VPP managers have developed an application template based on the OSHA publication "Are You Ready for VPP" (OSHA, 2007). The application starts with some general information about the worksite including name, address and points of contact; description of the workplace, scope of the work performed and the workforce; and applicable union information. The next section is a report of the company's most recent injury and illness rates and applicable contractors that are entered into a prescribed table. The rest of the application is developed by answering questions about the safety and health management system elements and subelements.

Each OSHA regional VPP manager has his/her own position on what attachments should be included with the application. Those positions range from comprehensive attachments, such as copies of all hazard control programs, to a minimalist approach with limited attachments. The rationale for the minimalist approach is that since most hazard control programs are regularly reviewed and revised, what is submitted with the application may not be what is in place during the on-site evaluation. This would



## *Having a good preexisting labor/management relationship facilitates entry into the VPP.*

result in a duplication of effort in reviewing both programs instead of only the current one. Another attachment that should be considered is a copy of a site plan. VPP requires that this be included with the application. However, since an application becomes public record once the site is approved for VPP, security considerations must be addressed and the VPP manager may agree to accept a description of the site rather than the site plan.

Documents that must be submitted with the application include: site safety and health policy, union letter of support (if applicable), statement of commitment or assurances signed by the facility manager, most recent annual evaluation report (discussed later in this section), table of recordable injuries and illnesses, samples or templates of specific documents such as permits, and employee performance evaluations.

The application is a tool to demonstrate to OSHA that all safety and health management system elements are being effectively addressed. The responses to each application format question should be a balance of conciseness and detail. Detail should be reserved for those elements that are considered areas of excellence. Don't overwhelm the VPP manager with too much detail.

Another document that must be submitted is the most recent annual evaluation of the site's safety and health management system. Another reason to have a dialogue with the local VPP manager is that some require evaluations from the past 2 years while some only require the most recent one. Appendix D of the OSHA VPP Policies and Procedures Manual (OSHA, 2003) contains a recommended format for the annual evaluation, but that format is not required until the site has been approved to participate in the VPP. Until then, most formats would likely be acceptable as long as all elements are addressed and corrective actions are identified for any areas recognized as needing improvement.

Several resources are available to assist in the process of writing the application. VPPPA sponsors a mentoring program to allow those interested in applying to gain the insight of a company that has successfully completed the process. Mentors are not experts and they will not write a firm's application. In addition, because of potential liability issues, mentor input is usually limited to the trials and tribulations of writing an application, as well as preparing for and undergoing the evaluation. Some mentors may assist in the development or revision of specific safety and health programs, but this is not always the case, since doing so may carry liability for errors and omissions.

VPPPA and a few independent consultants offer application workshops that provide detailed instructions for preparing an acceptable application. Some independent consultants will complete the application and prepare a site for all aspects of the VPP evaluation.

Firms that write their application in house can take advantage of a great opportunity to involve employees in the safety and health management system. The responsibility could be assigned to the safety and health committee, a group of employee

volunteers or an individual such as the safety manager, although this is the least preferred method. While the safety manager would probably be the most knowledgeable person, s/he may not have sufficient time to devote to the application.

Application authors need not be experts in the safety and health management system, but they should be familiar with some of its elements. Group members should represent each level and each workgroup at the site, including managers, office staff, production, labs, shipping, maintenance and others. Once the element champions are identified, they must be provided the time to complete the application, and access to the information and subject experts.

Using an employee group instead of the safety manager provides an additional benefit. By encouraging more participation, a company spreads the sense of ownership of the safety and health management system and the VPP application that is critical to a successful on-site evaluation. This process also exposes each element to a more critical review by others, which may result in more improvements. Many companies have identified strong safety advocates through this involvement, creating hourly workforce leaders who have enhanced their effectiveness.

Regardless of how a site writes the application, the team should develop specific time frames that take into account identifying those to be involved, providing training, making assignments, reporting status, reviewing the application, taking advantage of opportunities for improvements, and completing the application. The group should also hold regular meetings to discuss issues, status, recommendations, and requests for more information and resources.

### **Submission of the Application**

Once the application has been completed and reviewed, it should be submitted electronically to OSHA. If the document is not too large it may be sent via e-mail or saved on a CD and mailed to the OSHA regional VPP manager. A hard copy may also be mailed to the regional VPP manager.

The regional VPP manager will acknowledge receipt of the application within 15 days and will usually review it within 30 days. Once the application is reviewed, the regional VPP manager will contact the site either to confirm that the application is acceptable or to request additional information. The site has 90 days to submit additional information or the application may be administratively rejected and returned. Shortly after the application is accepted, the site will be contacted to schedule the on-site evaluation. The evaluation is scheduled at a time convenient to all principals, but usually must be started within 6 months of application acceptance.

### **Preparation for the On-Site Evaluation**

After the on-site evaluation is scheduled, the site must begin to prepare for the evaluation team's visit. This team, which will be on site for 3 to 4 days, will consist of a team leader from OSHA, and two or three additional members representing both the safety and health disciplines. The size and makeup of the

team and the length of the evaluation will vary based on the facility's size and complexity. For example, a large chemical plant with several hundred employees would probably require a team of four or five members who would be on site for 4 to 5 days. Such a team would include a specialist in OSHA's process safety management requirements. At the other end of the spectrum, a small, low-hazard facility would probably have a team of three for 2 to 3 days.

Mentors and other VPP sites and consultants are excellent sources of assistance in preparing for the on-site evaluation, especially if they are from the same region. They have undergone the evaluation process and are familiar with the expectations, requirements and approach of the regional VPP manager.

The team leader will send a letter to the site VPP contact about 1 month before the on-site evaluation is scheduled to begin. That letter will contain evaluation details, including information such as dates and times, team members and their disciplines, documents to be reviewed, as well as administrative requirements such as interview rooms and computer support.

The VPP on-site evaluation has been metaphorically compared to a three-legged stool. Three basic phases function concurrently: the site tour or walkaround; document reviews; and interviews. Without all three phases, like a three-legged stool with one leg missing, the evaluation will fail. The evaluation begins with an opening conference. Once the team members have received their safety briefing, they will tour all areas of the worksite. Unlike an OSHA inspection, they will not conduct a wall-to-wall tour. Rather, they will visit each major area of the facility, but may skip around and not look at all areas with the same detail. For example, they may only look at some of the production lines if all are the same, or look at some, rather than all, of the offices.

The document reviews focus on all OSHA-required and other hazard control programs, as well as supporting documents for the safety and health management system elements.

To facilitate the document review, some companies have developed a file cabinet approach, while others have sectionalized the documents. Two types of documents are usually reviewed: hazard control programs (e.g., lockout/tagout, hazard communication, confined space, emergency response) and activity documents (e.g., inspection reports, incident investigations, safety and health committee meeting minutes, completed permits, OSHA 300 logs).

Once the hazard control programs are reviewed, team members will verify their application. Almost all evaluations include a mock lockout process to demonstrate the process to the team. Examples of the supporting documents are inspection reports, safety suggestions, job hazard analyses, management of change documents and training records.

The hazard control programs should be consolidated and made readily available to the team. They can be sectionalized by the major safety and health management system elements. The authors do not suggest the consolidation of the activity documents for several reasons: It is usually inconvenient to move

## Case Study of VPP Success

Many companies have realized various measures of success as a direct result of their commitment to VPP. A few of those successes are described here.

- After focusing safety and health activities on the VPP, the Department of the Navy realized a 4.8% increase in employee participation measured by the number of safety passports completed over an 18-month period. During the same period, the rolling total case incident rate dropped about 33%.

- International Paper studied a mix of 174 similar VPP (50) and non-VPP (124) sites. The firm found that the VPP sites were significantly more successful in controlling hazards and reducing injuries and illnesses. VPP sites avoided about 18% of recordable events and 45% of lost-time cases annually. If all of the sites were VPP participants, the firm estimated that it could have realized a savings of \$16.52 million in workers' compensation costs.

- General Electric studied the effects of VPP participation on its global safety and health management systems effectiveness. The company uses the following reasons to support the use of the VPP for safety improvement:

- 1) Structured process for improving safety performance:
  - verifies that management systems meet government expectations;
  - improved ability to find and fix hazards and compliance issues.
- 2) Requires buy-in from both management and labor:
  - team approach essential to improvement;
  - builds credibility with employees.
- 3) Proven results—real benefits:
  - decrease in injuries and lost-time cases;
  - increases in productivity, quality and employee morale.
- 4) Global standard—Mexico, Canada and GE "Global Star":
  - consistent process from Shanghai to Schenectady.
- 5) Builds positive relationships and credibility with governments:
  - partnership with OSHA.

the records; moving the records may result in damage or loss; and the reviewer may have to expand the review to additional documents that were not moved.

Formal interviewees are selected by the team leader from a list of all employees prepared by the site. They may be selected using standard random number tables or selected by title, function and location. For facilities that operate more than one standard shift, the team leader will decide how to ensure that the nonstandard shift workers are also represented in the interviews. This may require visiting the site during the nonstandard shift or interviewing a nonstandard shift employee during the day. Unless the nonstandard shift operations are different from the standard shift, the team will probably only visit the site during the day.

The on-site evaluation can create a high level of anxiety for all site employees. Management is concerned about the site's readiness, employees are concerned about the interviews, and the safety manager is concerned about everything. The interviews are usually the source of the most anxiety.

### Interviews

Two types of interviews are conducted: informal and formal. All interviews are confidential. During their site tour, team members will occasionally stop to speak with employees, selected either at random or because of an observed task. These interviews are considered informal and are addressed mostly at the work process and how it is performed safely. Topics may include PPE, hazard communication, control of hazardous energy and emergency response.





*The high level of cooperation found at VPP worksites complements OSHA's regulatory efforts.*

In addition, the team leader will randomly select several employees to be interviewed formally. The goal is to select a cross-section of the workplace, including the senior facility manager. No employee is required to agree to be interviewed; the team recognizes that some employees just do not feel comfortable in an interview. The formal interview is conducted in a private location and usually lasts 15 to 20 minutes. Team members typically use the suggested interview questions that can be found in Appendix G of the OSHA VPP Policies and Procedures Manual (OSHA, 2003).

Many VPP sites have prepared their employees for the formal interviews by providing them a copy of Appendix G and performing mock interviews. This can help significantly reduce any anxiety that employees may have.

#### **Site Tour**

It is natural to want to clean up in advance of the team's visit and the team will appreciate the improvement. However, the evaluation is more focused on the facility's general condition, the work process, employee behaviors, and the condition of the equipment rather than on new coats of paint. So, while housekeeping is encouraged, a site need not go overboard unless the work had already been planned. The team really wants to see the facility as it usually is.

During the tour, the team will make general and specific observations. In addition to looking for emergency egress, lighting, housekeeping and employee behaviors, the team will look to ensure that all OSHA standards are being met. To address this, site management should support the team with a facility hazard correction team, which would probably include the maintenance department. The facility hazard correction team should have a digital camera to take pictures of those items pointed out by the team. The observed correction items should also be entered into some form of spreadsheet or work order system, with work assignments and correction time frames.

Several meetings will be held during the on-site evaluation. The first meeting is usually referred to as the opening conference, and it should be attended by the site's core VPP team and as many other site employees as possible. The hourly workforce must be represented as well. Although the opening conference follows no specific format, it usually starts with a welcome from the site VPP contact, the site safety manager or the senior site official, followed by a brief explanation of emergency response procedures. The team is then provided a brief description of the site including the type of work, the workforce, the safety and health resources and the safety and health management system. The OSHA team leader is then given an opportunity to describe the scope of the evaluation.

At the end of each day of the evaluation, the team and the site's core team will meet for an "out-brief" to discuss the day's findings, as well as any recommendations for improvement and required corrections to eliminate hazards. The following morning begins with an "in-brief" during which site representatives can describe any completed corrections and the status

of the remaining items. These status reports are based on the spreadsheet or work order system.

It is also helpful for the team to participate in working lunches with select site employees and committees. This should include an opportunity for the team to meet with various committee members for additional interviews and to listen to the site's teams such as fire brigades and medical emergency response groups. This gives those teams, committees and groups an opportunity to provide details about their activities and training.

#### **Respond to All OSHA Recommendations**

During the evaluation, the team will be looking critically at all elements of the site's safety and health management system. The team expects a minimum quality level of compliance with OSHA regulations for all elements, and higher than minimum for many elements. Keep in mind that any observations and suggestions are based on OSHA standards as well as general business practice. VPP sites are expected to surpass OSHA standards and to address hazards that may not be specifically covered by an OSHA standard. Given that, listen to the team's suggestions with an open mind and reserve the right to disagree. In keeping with the cooperative nature of VPP, graciously accept the suggestions or respectfully disagree. OSHA VPP teams are accustomed to receiving some resistance to their suggestions and they are willing to listen to the site's position. However, it is important to recognize that the team expects their findings and recommendations to be received with an open mind. The team's primary intent is to ensure that employees receive the very best protection available.

#### **Post-Evaluation Activities**

At the conclusion of the evaluation, team members will meet privately to review their findings, reach a consensus on their recommendation for VPP participation and write the evaluation report. When the report is completed, the site will hold a formal closing conference during which the team leader will report the team's findings and inform attendees of the recommendation.

The team leader will provide the site with an electronic copy of the report and recommendations. The site will have about 30 days to review and comment on the report and recommendations. Minor issues such as housekeeping deficiencies are not typically included in the final report, but rather are provided to the site on a daily basis as a laundry list of items to be completed. Compliance deficiencies are identified as 90-day items and must be completed before the final report is sent to Washington, DC. Any 90-day items will be listed in the draft report, but will be removed from the final report once they are completed. Recommendations that address noncompliance issues are nonbinding suggestions for enhancements, are not mandatory and typically do not require any follow-up between the site and the evaluation team. In addition to any editorial comments on the report, the site must either formally accept the report or identify specific

concerns about it. To demonstrate completion of the 90-day items, the site must provide some form of verification, such as a description of work or photos.

When the evaluation team leader receives and verifies correction of all 90-day items, s/he will submit the report to the regional administrator for review and concurrence with the recommendation. The report will then be forwarded to OSHA's national office with the regional administrator's concurrence of the recommendation. The OSHA national office also reviews the report and recommendation before it is sent to the assistant secretary of labor for the final decision.

After the report is approved by the assistant secretary of labor, an official letter of congratulations will be sent to the senior site official and the regional VPP manager will be notified. The regional VPP manager will notify the site VPP contact and the local OSHA area director of the acceptance and will order a VPP flag and plaque.

### Celebrate

Now comes the fun part: preparing for the formal VPP flag and plaque presentation. Many worksites make the most of this opportunity to celebrate their achievement. Celebrations can range from simple to elaborate; the type of celebration is not as important as the intent. In one memorable celebration, a large chemical company had allocated about \$25,000 for the presentation ceremony. A group of employees suggested that management allocate \$11,000 and authorize the group to manage the affair. The employees planned a simple meeting with light refreshments and invited the press, local community organizations and political representatives. The refreshments cost about \$1,000. The balance of \$10,000 was donated equally to two service organizations (Make a Wish Foundation and a group assisting children with AIDS). The benefits of this approach were many. The company saved \$14,000 on the occasion, employees gained a greater sense of ownership and recognition, management demonstrated its leadership and belief in the employees' abilities, the two organizations received substantial contributions and the company received great public relations. That was followed 5 years later with a similar celebration and equivalent contributions to local emergency response organizations.

### The Party's Over—Now What?

The VPP requires regular verification visits to all VPP sites. Star sites are visited every 3 to 5 years and Merit sites about every 18 months. OSHA also receives copies of each year's annual evaluation reports, including the table of injuries and illnesses from the OSHA 300 logs.

The challenge is not only to maintain the very high level of quality safety and health management systems expected of VPP sites, but also to continually look for ways to improve that quality. One of the basic principles of OSHA's VPP is the focus on continuous improvement. The VPP does not expect perfection in safety and health, but a commitment to be

## OSHA Challenge

OSHA's Challenge Pilot caters specifically to organizations which are interested in VPP, but that need some help in meeting the requirements. OSHA Challenge recognizes that there are many employers at different stages in the process of working toward implementing a successful safety and health management system.

The program provides opportunities for employers not currently served by existing OSHA cooperative programs to work with the agency and receive recognition for their efforts. Challenge participants link into either a general industry or a construction track. Within each track, participants follow a detailed three-stage roadmap that guides them to improve their safety and health management systems and work toward VPP status.

As employers make incremental improvements in their safety and health management systems, OSHA will recognize their progress. The online roadmap establishes clear actions, documentation and outcomes required to progress from one stage to the next. A participant that successfully completes all three stages and graduates from the pilot may be considered for expedited approval to the VPP Star or Merit program.

In Sept. 2006, C.R. Meyer, a Wisconsin general contractor, was the first company to achieve VPP Star status from participating in the OSHA Challenge Pilot.

For more information on OSHA Challenge, including the application process, contact the OSHA Office of Partnerships and Recognition at (202) 693-2213.

the best. As former Chrysler chair Lee Iacocca used to say, "Lead, follow or get out of the way."

### Conclusion

Since initiation of the VPP, 1,341 federal VPP sites have been recognized (as of September 2007). Of those, 1,290 are either Star or Star Demonstration sites. The 51 Merit sites account for less than 4% of all federal VPP worksites. The apparent success in achieving Star from the initial application evaluation is attributed to the readiness of the applicants. Most successful Star applicants have been mentored by other VPP Star sites and have had ongoing contact with their local OSHA VPP representative. Many submissions were delayed to enable recognized weaknesses to be improved with enough time to demonstrate their effectiveness. This also explains why more than 99% of all VPP applications result in approval for participations, regardless of the level.

The VPP is an excellent way for a company to elevate its safety and health process to the next level. The VPP provides many tangible and intangible benefits to all stakeholders—management, labor, OSHA and the community. Companies that have participated in the VPP have seen enhanced performance not only in safety and health, but other business metrics as well. ■

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