

The Value of OSHA's Voluntary Protection Program (VPP)

**Brian Bennett, CSP
Norman Deitch, OHST**

Introduction

The Occupational Safety and Health Administration (OSHA) administers the nation's premier safety and health recognition program. Created in 1982, OSHA's Voluntary Protection Programs (VPP) recognize and partner with worksites that show excellence in safety and health. VPP Sites are committed to effective employee protection beyond the minimum requirements of OSHA standards. 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 Occupational Safety and Health 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.

There are three general requirements for participation in the VPP:

1. An effective, ongoing safety and health process

A comprehensive and effective safety and health process, involving all levels of employees, is the best way to prevent occupational injuries and illnesses. VPP worksites are expected to develop and implement a safety and health process that address the hazards present in the workplace, and in some cases exceed the minimum requirements spelled out in the 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 all applicable standards are addressed. Performance, in terms of occupational injury and illness rates, are also evaluated. VPP Star worksites must have injury rates that are below the national average for their particular industry classification. Merit worksites must be able to reduce their injury and illness rates within 3 years.

Good performance does not stop once the VPP on-site evaluation team has completed their review – continuous improvement is expected.

Levels of Recognition

There are three levels of recognition within the VPP: Merit, Star, and Star Demonstration.

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 of the elements. Merit worksite's safety and health management systems need some improvement to be judged excellent. Merit worksites demonstrate the potential and commitment to meet specific safety and health goals necessary to achieve Star quality within three years. Merit is a designation that can also be assigned to those 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 two years to achieve sufficient rate reductions to meet the requirements. Therefore, the Merit level serves as an effective stepping stone to Star. Typically, a site that is recognized as a Merit worksite will be assigned one or more goals to be completed within a maximum of three years in order to be elevated to the Star worksite level. Merit workplaces are typically limited to one three year term, unless a second term is approved by the Assistant Secretary of Labor for Occupational Safety and Health. Merit worksites receive an on-site re-evaluation every 18-24 months.

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

The Star level is reserved for the best of the best; those exemplary worksites that have a fully functional and effective safety and health management system that has been in place for at least one year. Star worksites must also have achieved injury and illness rates below the national average of their respective industry. Star worksites receive an on-site re-evaluation every 3-5 years.

The Four Cornerstones of VPP

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

1. Management Commitment and Employee Involvement

This cornerstone is believed by many to be the most important. First, management must be committed not only to the safety and health process, but to the principles of the VPP. Management must ensure that the appropriate resources in terms of manpower, money, and equipment are provided to ensure the highest level of safety and health performance. Management must delegate responsibilities for safety and health to the appropriate personnel, and hold them accountable for their performance. Management must also demonstrate their commitment by "walking the talk"; that is, actively participate in the safety and health process by attending safety meetings, presenting safety and health training, conducting inspections, etc.

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. There are a myriad of ways this can be accomplished, including: conducting inspections, providing safety and health training, participation on the emergency response team, membership on the safety and health committee, preparing or reviewing job hazard analyses, performing incident investigations, etc. Almost any technique used to involve employees in the day to day operation of the safety and health

process is acceptable, so long as their participation is active and meaningful. The intent of employee participation is to ensure that employees take ownership of the safety and health process.

2. Workplace Analysis

This cornerstone involves the various techniques that are used at the site to ascertain the hazards that might be present at the worksite, including: job or process hazard analyses, industrial hygiene sampling, management of change procedures, hazard reporting and tracking system, incident investigation, and routine inspections, occupational healthcare and reviews of the OSHA Logs and other trend analyses of leading indicators.

3. Hazard Prevention and Control

Hazard Prevention and Control is a logical extension of the Workplace Analysis cornerstone. Once hazards have been identified, there needs to be a system to prevent them from occurring, or controlling the extent of the adverse effect if they were to occur. Hazard Prevention and Control includes the typical Hierarchy of Control programs such as: lockout/tagout, confined space entry, emergency response, bloodborne pathogens, hazard communication, and process safety management. They also include work procedures, engineering controls and personal protective equipment.

4. Training

The final VPP cornerstone is training. This element includes all regulatory and job specific training programs that have been implemented to ensure 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 go beyond the minimum regulatory training required by the various standards and include other workplace and off the job training topics for employees as well as their families.

Why Participate in the VPP?

Many employers reason that barring a “catastrophe” (the hospitalization of 3 or more employees), a workplace fatality, or an employee complaint, the chance of OSHA conducting a programmed inspection is pretty slim, with the likelihood of an inspection occurring within the next 20 or 30 years unlikely. So why would an employer voluntarily invite OSHA into their workplace? Is it worth the risk?

A worksite should not submit a VPP application until they are sure that they have a comprehensive, well established safety and health process that not only complies with the OSHA standards, but exceeds them in many areas. A worksite should apply to the VPP when they feel they have a mature safety and health process that involves all levels of employees, and are worthy of the recognition that VPP brings.

Benefits of the VPP

There are many benefits that accrue due to participation in the VPP, including:

- Validation of your safety and health processes
A common concern among employees that have safety and health responsibilities at a worksite is whether they are doing the right thing or doing enough to ensure not only that their employees are protected, but that compliance has been achieved. By going through the VPP on-site evaluation process, the OSHA VPP team will evaluate each

element of your safety and health process to ensure that it meets the minimum requirements.

- **No penalty inspection**
One of the benefits of participation in the VPP is that if the OSHA VPP on-site evaluation team discovers any violations of OSHA standards during the evaluation, no citations will be issued. However, corrective actions must be implemented promptly.
- **Recognition**
Achieving VPP Star status is the highest recognition that can be achieved. Star worksites have exemplary safety and health processes, and are the best of the best. As an example, there are only approximately 1,600 VPP worksites out of the approximately 7,000,000 worksites eligible for participation. This recognition can not only raise employee morale, but help foster acceptance in the community in which you operate as you have demonstrated your commitment to safety and health.
- **Competitive Advantage**
VPP worksites soon realize they have an edge against their competitors. Customers will benefit from lower costs due to the lower injury and accident rates. Quality will be higher as the same worker will be making the product every day since they are less likely to suffer an injury and be off from work. When measuring potential suppliers, the VPP may be the only criterion that differentiates your company from another. VPP status can make a company more marketable.
- **Higher Employee Morale**
Employees that are fully engaged and participate in the safety and health process are more comfortable coming to work, knowing the chance of them being injured or involved in an accident are extremely low compared to other worksites. In short, safe workers are happy workers!
- **Third Party Verification**
The OSHA VPP on-site evaluation team can serve as impartial, independent auditors, validating the effectiveness of your safety and health process. Unlike other third party program verifications, there are no application or certification fees associated with a VPP evaluation.
- **Removal from OSHA's Programmed Inspection List**
VPP sites are removed from OSHA's programmed and targeted inspection lists. However, as mentioned previously, VPP worksites can be inspected upon OSHA's receipt of an employee complaint or the suffering of a catastrophic event.
- **Cooperative Environment between Labor, Management, and OSHA**
Everyone wins in this scenario. Labor-Management relationships are better in VPP sites because of the openness, inclusiveness, ownership, and accountability that exist in VPP worksites. VPP worksites also enjoy a cooperative and non-confrontational relationship with OSHA.

The Business Case for VPP

Although there are many benefits for participation in the VPP, most of them are intangible. It is very difficult to sell ideas to upper management when they cannot reach out and touch the benefits. In one anecdotal VPP success story, to help convince upper management of the true value to the business of participation in the VPP, a study was conducted to relate VPP to the bottom line. In 1996, the author conducted a survey of 15 VPP worksites across a variety of industries in the New York/New Jersey metro area. The purpose of the study was to determine if the VPP principles were extended to the business practices of the worksites, and if so did it lead to increased profitability. The results were not surprisingly, extraordinary.

Every measurable business indicator was significantly improved once the VPP principles had become ingrained in all aspects of the business.

Each of the worksites was asked to answer the following questions based on the data for a period of three years before VPP participation against the data from three years after VPP participation:

1. Workers compensation insurance costs
 - a. Costs were reduced approximately 55%.
2. Injury/Illness Rates
 - a. Rates decreased by approximately 70%.
3. Absenteeism
 - a. Employee absenteeism from work decreased from approximately 6% to 1.5%.
4. Quality
 - a. Customer complaints due to poor product/package quality decreased approximately 85%.
5. Hourly participation in all aspects of the business
 - a. Approximately 90% of all hourly employees were actively involved in some business related committee as opposed to less than 10% before the VPP process began.
6. Union Grievances
 - a. Union grievances decreased an average of 75%.
7. Budget Performance
 - a. 100% of the worksites reported improvements in the actual costs compared to the budgeted costs.
8. Profits
 - a. 100% of the sites realized increased profits at their facility after VPP recognition.
9. Accidents/Incidents
 - a. Worksites saw a decrease in accidents/incidents of 50%.
10. Employee Perception
 - a. All worksites reported that the employee's perception of the company in terms of whether the facility was a good place to work had improved.

These results are attributable 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 one of these indicators translates directly to increased profitability which can easily be measured in terms of dollars and cents.

Getting Ready to Participate in the VPP

Once a site has made the decision to move forward with the VPP process, a multi-disciplinary Gap Analysis Team should be assembled. The team can be comprised of employees from all levels, as well as outside resources such as corporate staff, mentors, or consultants. The primary task of this team is the completion of the gap analysis. The gap analysis is an audit of the site's existing policies, programs, and processes measured against the required VPP elements and sub-elements. Upon completion of the gap analysis, a corrective action plan that lists all of the shortcomings should be created. The corrective action plan should assign specific action items to specific personnel for completion. The Gap Analysis Team should meet on a regular basis to track the status of the corrective actions, and lend their support

when necessary. The gap analysis should be started as soon as possible, as a requirement in the VPP is that all required elements and sub-elements be in place and functional for a minimum period of one year before Star status can be awarded.

Application Preparation and Submittal

Once you have decided that the VPP is a good match for your company and employees and you have completely addressed all of the corrective actions identified in the gap analysis, you are ready for the next step in the VPP process: the application has to be written and submitted. Although the application is fairly straight forward, there are many different approaches that can be taken to actually write it. This section will discuss the application and suggest some of those ways that other companies have found successful.

The most important advice that can be offered relative to the preparation of a VPP application is to create a dialog with the local OSHA Regional VPP Manager. They are in the best position to advise what they expect in an application and can provide preferred tools and templates.

The VPP application can be very simply described as a comprehensive narrative summary of how you manage each of the four major elements of your safety and health management system and each of its sub-elements. Using the OSHA Guidelines for Safety and Health Management Systems, the four elements are: Management Leadership and Employee Involvement, Worksite Analysis, Hazard Prevention and Control, and Safety and Health Training. The number of sub-elements is variable based on each company's specific operations, processes, organization, chemicals used, and size. Although you may have heard about the "19 VPP Elements" there are actually about 32 sub-elements. All of the elements and sub-elements are defined on the OSHA application.

Most OSHA Regional VPP Managers have developed an application template that can be used to complete the application. Those templates have been based on the OSHA publication "Are You Ready for VPP", which is available on OSHA's VPP website¹. The application starts with some general information about the worksite. That includes the name and address, the site points of contact, a description of the workplace and the scope of the work performed, and the workforce and applicable union information. The next section is a report of the most recent injury and illness rates for the company and applicable contractors that are entered into a prescribed table. The rest of the application is developed by answering questions about each of the safety and health management system elements and sub-elements.

Each OSHA Regional VPP Manager has their 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 onsite evaluation. That would result in a duplication of effort in reviewing both programs instead of only the current one. Another attachment that should be discussed is a copy of a site plan. The VPP requires that a copy of the site plan be included with the application. However, since an application becomes part of the files made public record when the site is approved for VPP, security considerations must be addressed and the VPP Manager may agree with just a description of the site instead of the site plan.

Those 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 (this is 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 your tool to ensure to OSHA that all safety and health management system elements are being addressed effectively. The responses to each of the application format questions should be a balance of conciseness and detail. Although you can include some bragging about your safety and health management system, try to refrain from delving too deeply into your activities for most of the elements. Reserve the bragging to those select elements that you consider areas of excellence that OSHA may identify as best practices. The appropriate place for your bragging rights is in the required annual evaluation. Follow this guidance: “Don’t burden the VPP Manager with bulk; bedazzle him/her with brilliance”.

The most recent annual evaluation of your safety and health management system is one of the few documents that must be submitted with the application. Another reason to have a dialog with your local VPP Manager is that some of them require the last two years’ evaluations and some only require the most recent one. Appendix D of the OSHA VPP Policies and Procedures Manual² contains a recommended format for the annual evaluation, but using that format is not required until the site has been approved to participate in the VPP. Until then, whatever format your company uses would most likely be acceptable as long as all elements are addressed and there are corrective actions identified for any recognized areas that need improvement.

There are several resources that are available to assist in the process of writing the application. The Voluntary Protection Programs Participants Association (VPPPA) sponsors a Mentoring Program. Those interested in applying can take advantage of the insight that can be provided by a company that recently successfully underwent the same process. Mentors are not experts and they will not write your application. But they can provide the trials and tribulations that come with writing an application, as well as preparing for and undergoing the evaluation.

The VPPPA and a few independent consultants provide Application Workshops that provide detailed instructions for the application, for each element. These workshops usually coincide with the VPPPA’s national and regional conferences. There are also independent consultants that will complete the application and prepare you for all aspects of the VPP.

Should you decide to write the application in house, you can take advantage of a great opportunity to involve some of your employees in your 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. The latter would be the least preferred method. Although the Safety Manager would probably be the most knowledgeable person, he/she may not have the time to devote to the application. The authors do not have to be experts in the safety and health management system. They do have to be familiar with some of the individual elements. Group members should represent each level and each workgroup at the site. That would include: managers, office staff, production, labs, shipping, maintenance, etc. Once you identify those element champions they must be provided the time 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 you will be spreading the sense of ownership of the safety

and health management system and the VPP application that is critical to a successful on-site evaluation. Also, you will be exposing each element to a more critical review by others and that may result in more improvements. Many VPP companies have identified very strong safety advocates through this involvement. They have created hourly workforce leaders that have enhanced their effectiveness.

Regardless of how you decide to proceed with the writing of the application, you should develop specific timeframes. Those timeframes should include identifying those to be involved, providing training, making assignments, status reports, application reviews, recognized opportunities for improvements, and application completion. The group should also have 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 to OSHA electronically. It may be e-mailed if it is not too large a document, or saved on a CD and mailed to the OSHA Regional VPP Manager for the region in which the worksite is located. 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 to either confirm that the application is acceptable or to request additional clarification for those specific sections of the application that were found to be incomplete. The site has 90 days to submit additional information or they face the possibility that the application will be administratively rejected and returned. Shortly after the application is accepted, the site will be contacted to schedule the VPP onsite evaluation. That evaluation is scheduled to be convenient to all principles but usually must be started within six months after the application was accepted.

Prepare for the OSHA On-site Evaluation Team

After the VPP onsite evaluation is scheduled, the site must begin to prepare for the visit by the evaluation team. The Team will consist of a Team Leader from OSHA and either two or three additional members. They will represent at least both the safety and health disciplines and will be onsite for about 3-4 days. The size and makeup of the Team and the length of the evaluation are dependent on the size and complexity of the facility. For example, a large chemical plant with several hundred employees would probably require a Team of 4-5 members that would be onsite for 4-5 days. Such a Team would include a specialist for 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 2-3 days.

Mentors and other VPP sites and consultants are excellent sources of assistance in preparing for the onsite evaluation, especially if they are from the same Region. They have undergone the evaluation process and are very familiar with the expectations, requirements and evaluation process of the Regional VPP Manager. The Team Leader will send a letter to the Site VPP contact about one month before the onsite evaluation is scheduled to begin. That letter will contain the details of the evaluation, including information such as: dates and time for the evaluation, team members and their disciplines, documents to be reviewed, and other administrative requirements such as interview rooms and computer support.

The VPP onsite evaluation has been described as a three legged stool. There are three basic phases that function concurrently. They are the site tour or walk around, paper work 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, discussed later in this section. Once the Team has received their safety briefing they will tour all areas of the worksite. Unlike an OSHA inspection, they will not do a wall-to-wall tour. Rather, they will visit each major area of the facility but may skip around some and not look at all areas with the same detail. For example, they may only look at some of the production lines if they are all the same. Also, they will only look at some offices instead of all of them.

The paper work reviews focus on all of the OSHA required and other hazard control programs as well as supporting documents for the safety and health management system elements. 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, training records, etc.

The 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 by choosing by title, function and location. For those facilities that operate more than one standard shift, the Team Leader will decide how to ensure that the non-standard shift workers are also represented in the interviews. That may be by visiting the site during the non-standard shift or by interviewing a non-standard shift employee during the day. Unless the non-standard shift operations are not the same as the standard shift, the Team will probably not visit the site other than during the day.

The onsite evaluation brings with it a high level of anxiety for all employees at the site. The management is concerned about the site's readiness, the employees are concerned about the interviews, and the Safety Manager is concerned about everything. The interviews will be discussed first since they usually result in the most anxiety. There are two types of interviews. All interviews are confidential between the interviewee and the Team. The Team members, during their tour of the site, will occasionally stop to speak with some 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.

In addition, the Team Leader will randomly select from a list of all employees those that will be interviewed formally. The idea is to randomly select a cross section of the workplace, including the senior facility manager. It must be emphasized that no employee is required to agree to be interviewed; the Team understands that some employees just do not feel comfortable in an interview. The formal interview is done in a private location and usually lasts about 15-20 minutes. Although it is identified as formal, it is actually informal in its nature. Team members usually refer to the suggested interview questions in Appendix G of the OSHA VPP Policies and Procedures Manual³.

Many VPP sites have prepared their employees for the formal interviews by providing them with Appendix G and performing mock interviews. That has helped to significantly reduce any anxiety that the employees may have.

To facilitate the document review some companies have developed a file cabinet approach and others have sectionalized the documents. There are two types of documents that are usually reviewed. They are the hazard control programs (e.g., Lockout/Tagout, hazard

communication, confined space, emergency response) and the activity documents (e.g., inspection reports, incident investigations, safety and health committee meeting minutes, completed permits, OSHA 300 Logs).

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 a few reasons. It is usually very inconvenient to move the records, moving the records may result in damage or loss; the reviewer may have to expand the review to additional documents that were not moved.

It is natural to clean up when company is coming to visit and the Team will appreciate the improvement. However, they are more focused on the facility's general condition, the work process, the behaviors of the employees, and the condition of the equipment rather than the new coats of paint. By all means, clean up, especially housekeeping, but do 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 be making general and specific observations of the workplace. In addition to looking for emergency egress, lighting, housekeeping, and employee behaviors, the Team will also look to ensure that all OSHA standards are being complied with. To address this, you should support the OSHA Team with a facility hazard correction team. That would probably include the maintenance department. The facility hazard correction team should be equipped with a digital camera and take pictures of those items pointed out by the Team. The observed correction items should also be entered into some form of spread sheet or work order system, with work assignments and correction time frames.

During the onsite evaluation there will be several meetings. The first meeting is usually referred to as the opening conference. This meeting should be attended by the site's core VPP team as well as many other site employees as possible. It is imperative that the hourly workforce be represented. Although there is no specific format for the opening conference, it usually starts with a welcome from the site VPP contact, the site safety manager or the senior site official. That is followed with a brief explanation of emergency response procedures. The Team is then provided a brief description of the site including: type of work, the workforce, the safety and health resources and the safety and health management system. The OSHA team leader then is 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 get together for an out-brief to discuss the days findings and any recommendations for improvement and required corrections to eliminate hazards. The following morning begins with an in-brief so the site representatives can describe any completed corrections and the status of the remaining items. These status reports are based on the previously mentioned spreadsheet or work order system.

OSHA's experience has also found it very helpful for the Team to participate in working lunches with select site employees and committees. As the adage states "there is no such thing as a free lunch." The working lunch 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. That gives those teams, committees, and groups an opportunity to brag about their activities and training.

Respond to All OSHA Recommendations

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

Post-Evaluation Activities

At the conclusion of the evaluation, the Team will get together in a private room to review their findings, reach a consensus on their recommendation for VPP participation, and write the VPP onsite evaluation report. When the report is completed the Team Leader will ask for the site to schedule a formal closing conference at which the Team Leader will report the Team's findings and inform the attendees of the recommendation. The Team Leader will provide the site with an electronic copy of the report and recommendation. The site will have about 30 days to review and comment on the report and the recommendations. In addition to any editorial comments you may have on the report, the site must either formally accept the report or identify specific concerns about it. The site must also address all hazard correction items (usually referred to as ninety day items), recommendations and suggestions. To demonstrate completion of the hazard correction items, the team leader must be provided with some form of verification, such as a description of work or photos. All hazard correction items must be completed. Suggestions and recommendations are just that: they are not required to be implemented.

When the site's comments are received and it has been verified that all hazard correction items have been corrected, the team leader 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 by e-mail. 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 really fun part; preparing for the formal VPP flag and plaque presentation. Many worksites make the most of this opportunity to celebrate their achievement. Celebrations have ranged from very sedate presentations accompanied with light refreshments

to more elaborate ones such as dinner dances or cruises. The type of celebration is not as important as the intent. One author remembers one very memorable celebration. A large chemical company had allocated about \$25,000 for the presentation ceremony. A group of employees suggested to management that if they were allocated \$11,000 and the authorization to manage the affair they would be able to save the company \$14,000. The employees planned a very simple meeting with light refreshments and invited the press, local community organizations, and political representatives. The refreshments cost about \$1000. 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 employees got 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 five years later with a similar celebration and equivalent contributions to the local emergency response organizations.

The Party’s Over—Now What?

At the closing conference and at the presentation ceremony the Team Leader will congratulate you on your achievement and suggest that you can then breathe a sigh of relief and relax. Your goal had been accomplished. It is then back to work. The VPP requires regular verification visits to all VPP sites. Star sites are visited about every 4-5 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 to not only maintain the very high level of quality safety and health management systems expected of VPP sites, but 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 the best. As former Chrysler Chairman Lee Iacocca used to say in his Chrysler ads, “Lead, follow or get out of the way.”

Conclusion

The VPP is an excellent way to elevate your safety and healthy 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. For more information, visit www.osha.gov and www.vpppa.org.

Footnotes

1. OSHA VPP application package
http://www.osha.gov/dcsp/vpp/vpp_kit.html
2. OSHA VPP Policies and Procedures Manual
http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=2976
3. OSHA suggested VPP interview questions

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=2976#appendixG