

## **OSHA's Voluntary Protection Programs (VPP) Continue to Bring Value**

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### **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) recognizes and partners 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 addresses 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 and that the system is working effectively. 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 three years.

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

## **The History of the VPP**

The VPP was established by OSHA to implement at a national level a program that had its origins in California in the late 1970s during the construction of the San Onofre Power Plant. The construction of the power plant was under the direction of Bechtel, a company that already had a strong safety and health program that included management leadership and commitment and encouraged employee involvement. Bechtel, the California Building Trades Council, and the National Constructors Association worked together to initiate a joint labor–management safety and health committee to oversee the safety and health activities at the construction project. The committee was responsible for performing routine work-site inspections and the investigation of worker complaints. California OSHA (Cal/OSHA) agreed to empower this committee to perform routine workplace inspections and to not perform any programmed compliance inspections. This program was approved by the California OSHA State Plan and submitted to Federal OSHA for its concurrence, and OSHA agreed to allow Cal/OSHA to proceed with the experiment. At the conclusion of the project, the experiment was deemed a success based on the sense of ownership of the safety and health program expressed by the trades’ workers, as well as being one of the safest such construction projects at the time.

After becoming president, former California Governor Ronald Reagan appointed Thorne Auchter as the Assistant Secretary of Labor for OSHA. Being aware of the dramatic success of the San Onofre program, Auchter directed the agency to develop a similar program for OSHA. The primary difference between the OSHA program and that offered by Cal/OSHA to the San Onofre project was that OSHA retained the right to perform inspections related to formal employee complaints and workplace fatalities and catastrophes. VPP work sites were to become exempt from routine programmed OSHA inspections.

Thanks to the efforts of several OSHA staff and those that responded to the public notice published in the Federal Register about the new program named the Voluntary Protection Programs, OSHA announced the VPP in the Federal Register on July 2, 1982, to establish the credibility of cooperative action among government, industry, and labor to address worker safety issues and expand worker protection. The success of the VPP is in large part due to those that created and nurtured the program in its early years. Foremost among those OSHA staff was Margaret “Peggy” R. Richardson, who has been dubbed the “Mother of the VPP.”

When the VPP was first announced, there were three programs: Star, Try, and Praise. Star was the program designation that was, and still is, assigned to those workplaces that exemplified what OSHA had envisioned as a demonstration of a strong management commitment for worker safety and health and a high level of involvement of employees in safety and health activities. Try was the precursor of the current Merit Program. The purpose of the Try Program was to provide recognition to those workplaces that did not meet the high level of safety and health quality of the Star Program but that were nonetheless committed to improving their management systems for safety and health to the Star Program level. Praise was intended as a program for low-hazard industries.

The very first VPP sites were three Johnson and Johnson Ortho-Clinical Diagnostics sites in New York, Massachusetts, and New Jersey. These were the only such worksites to be approved for the Praise Program. On October 26, 1982, OSHA approved the first workplace into the Star Program, which was General Electric Combustion Engineering in Wellsville, New York. Although ownership has changed several times over the years, that work site, now Alstom Air Preheater Company is still a VPP Star work site.

## **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 Star Demonstration programs that have become a formal part of the VPP 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 Current Status of the VPP**

In May 2009 the Government Accounting Office (GAO) submitted a report on their findings of a review of OSHA's administration of the VPP. The report contained several areas that were deemed deficient and included recommendations to address these deficiencies. These recommendations resulted in several administrative revisions to the way OSHA administers the VPP. Primary among these revisions was a tightening of the controls to ensure consistency in each of the ten OSHA regions. Another revision was the emphasis on the importance of the OSHA Regional Administrator's involvement in the final review and recommendation process. These revisions have resulted in several improvements to the administration of the VPP.

In the Obama Administration, Assistant Secretary of Labor for OSHA Dr. David Michaels has been directed to devote more resources to compliance and enforcement issues, and fewer resources to cooperative programs. What has this meant for the VPP? The waiting time for VPP applications to be reviewed and accepted has increased. Compliance Officers are being redirected towards enforcement activity. Consequently, the waiting time to receive an onsite VPP evaluation has also been extended, due to fewer resources being allocated to the VPP. However, the bottom line is the VPP is still a viable program, and is still an important component of OSHA's overall workplace safety and health strategy.

## **Does the VPP Still Bring Value?**

Even though the VPP is going through some rough times, it still makes sense to pursue recognition. The true value in the VPP is not the flag and plaque, but rather the culture it brings to your safety and health process. True success in safety and health can only come with full participation of all employees, along with their buy-in and ownership of the process. Therefore, it is the path to VPP that brings the true value, not the end result of VPP status.

The value of VPP can be maximized if the concepts of the VPP are extended to other areas of the business. One cornerstone of the VPP – management leadership and employee involvement - and the new culture of engagement, ownership, and responsibility that comes with it can be a valuable tool in making your business more efficient and profitable. For example, imagine if you can achieve similar success in your quality, budgeting, and manufacturing programs as you do in safety. Imagine if your employees take ownership and responsibility in these areas. Imagine if your employees channel their creative efforts to find new ways to solve old problems. Imagine if your employees drive the overall improvement process, and get involved in a cooperative venture with management to make the business more efficient and profitable.

These types of results are possible. Worksites that have extended the VPP principles of openness, active and meaningful employee involvement, empowerment, and accountability to all employees across all facets of the operation are much more efficient, competitive, and profitable than ever before.

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 over 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.

Many of these benefits were also demonstrated and reported by several very large corporate VPP participants, including the military and United States Postal Service.

## **Benefits of the VPP**

There are many benefits that accrue when the VPP model is embraced, including:

- Fewer injuries and incidents  
The reality is VPP sites have approximately 53% fewer injuries than non-VPP sites. There is a corresponding reduction in near miss incidents, environmental incidents, and property damage accidents.
- Lower costs  
It should be obvious that if there are fewer injuries and incidents, there will be lower costs.
- 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.
- 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. Their families are also more supportive of their employment knowing that all that can be done is being done to ensure their safety and health. 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.
- **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.

## **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 within realistic time frames. 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.

## **The Four Cornerstones of VPP**

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

1. **Management Leadership and Employee Involvement**  
This cornerstone is believed by many to be the most important. First, management must demonstrate their commitment 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 leadership 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 voluntary, 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 resulting in accidents, or controlling the extent of the adverse effect if accidents 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.

## **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.

The official OSHA application template for a typical worksite, "VPP APPLICATION INSTRUCTIONS for the SITE-BASED WAY TO PARTICIPATE", is available on the OSHA website<sup>1</sup>. 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 another 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 C of the OSHA VPP Policies and Procedures Manual<sup>2</sup> 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: management, 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. 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 must be started within six months after the application was accepted.

## **Post-Evaluation Activities**

At the conclusion of the evaluation, the Team will get together in a private room to review their findings and reach a consensus on their recommendation for VPP participation, and they may also write the VPP draft onsite evaluation report. When the team's meeting 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. The recommendation will not be presented to the worksite until it submits evidence to OSHA that all observed hazards have been corrected and the Regional Administrator has concurred with the recommendation. The Team Leader will provide the site with a list of observed hazards that must be eliminated.

The Team Leader will also present the findings and recommendation of the evaluation team to the Regional Administrator and discuss the observed hazards. Upon receipt of verification that all hazards have been corrected in a timely manner, the evaluation report and recommendation will be presented to the Regional Administrator for concurrence. Upon the concurrence of the Regional Administrator, the VPP Manager will send the report to the worksite for their 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. Suggestions and recommendations are just that: they are not required to be implemented.

When the site's comments are received the report will 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.

## You Are a VPP Worksite - Now What?

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](http://www.osha.gov) and [www.vpppa.org](http://www.vpppa.org).

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