

# Oregon's VPP

## Voluntary Protection Programs



*Recognizing Excellence  
in Safety and Health*

**GUIDELINES & APPLICATION PACKET**

# Are you ready for VPP?

Do you have what it takes to be one of the best?

Are you prepared to adopt a comprehensive, rigorous safety and health management system that you tailor to your worksite's specific needs?

Are you willing to try a cooperative, action-oriented approach where managers, employees, and Oregon OSHA work together to combat workplace hazards and reduce injuries and illnesses?

Do you want to be recognized for your commitment to worker safety and health?

*If the answer is yes, then maybe you are ready for Oregon OSHA's Voluntary Protection Programs.*

In Oregon, VPP is open to businesses and government where Oregon OSHA has jurisdiction. Nationally, VPP is open to private sector and federal agency worksites in most industries where federal OSHA has jurisdiction.



## STAR

Designed for exemplary worksites that have:

- implemented comprehensive, successful safety and health management systems; and
- achieved injury/illness rates below their industry's national average.

## MERIT

Designed for worksites with the potential and commitment to achieve Star quality within 3 years.

## DEMONSTRATION

Designed for worksites with Star quality safety and health protection that want to test alternatives to current Star eligibility and performance requirements.

### **This Guidelines and Application (G&A) Packet contains:**

An overview of VPP

Pages G-4 through G-5

Benefits of VPP

Pages G-6 through G-7

VPP self-assessment checklist

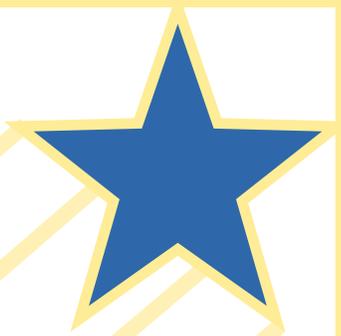
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What happens when Oregon OSHA comes onsite for a review?

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# The Voluntary Protection Programs Concept

Oregon OSHA is not just a regulatory enforcement agency. Oregon OSHA also encourages private and public sector efforts to improve occupational safety and health. Through the Voluntary Protection Programs (VPP), Oregon OSHA recognizes workplaces with excellent safety and health management systems and promotes them as model workplaces. The Voluntary Protection Programs place significant reliance on the cooperation and trust inherent in partnership.

To qualify for VPP, applicants must have in place an effective safety and health management system that meets rigorous performance-based criteria. In addition, all relevant OSHA standards must be met. Oregon OSHA verifies qualifications through a comprehensive onsite review process. Oregon OSHA approves successful applicants as Star, Merit, or Demonstration participants, with an exemption from programmed or scheduled inspections.

Participation in VPP does not diminish the rights or responsibilities of employers or employees under the Oregon Safe Employment Act (OSE Act). Complaints, accidents, chemical spills, and other significant events will result in an Oregon OSHA enforcement inspection according to agency policies.

Achieving VPP shows your employees, industry, and the community you are a leader in safety and health. As a model workplace, you demonstrate that a voluntary, cooperative, proactive safety and health partnership of management, labor, and a federal regulatory agency benefits all parties.

Oregon OSHA invites you to go for VPP. By accepting the challenge, you can save lives, increase productivity, and improve the working environment of your organization. Become a leader! Gain the recognition you deserve for being among the nation's best in worker safety and health.

# An Overview of VPP

## What is VPP?

Working with industry and labor, OSHA created the Voluntary Protection Programs (VPP) in 1982 to recognize and partner with worksites that implement exemplary systems to manage worker safety and health. The managers, employees, and any authorized representatives at these sites voluntarily implement comprehensive safety and health programs — hereinafter referred to as safety and health management systems — that go beyond basic compliance with OSHA standards.

Oregon OSHA adopted VPP in 1996. This program mirrors the federal VPP, and is open to Oregon employers. Federal worksites in the State of Oregon are encouraged to apply for federal OSHA VPP.

Using one set of flexible, performance-based criteria, the VPP process emphasizes holding managers accountable for worker safety and health, the continual identification and elimination of hazards, and the active involvement of employees in their own protection. These criteria work for the full range of industries, union and non-union, and for employers large and small, private and public.

The VPP places significant reliance on the cooperation and trust inherent in partnership. Sites choosing to apply for VPP recognition show their commitment to effective worker protection by inviting a government regulator into their workplace. In return, Oregon OSHA removes them from programmed inspection lists and does not issue them citations for standards violations that are promptly corrected.

Sites qualifying for VPP can attain Star, Merit, or Demonstration status. Star participants meet all VPP requirements. Merit participants have demonstrated the potential and willingness to achieve Star status, but some aspects of their programs need improvement. Demonstration participants test alternative ways to achieve safety and health excellence that may lead to changes in VPP criteria.

Statistical evidence for VPP's success is impressive. Consistently over its 20-year history, the average VPP worksite has had an incidence rate for days away from work, restricted work activity, and/or job transfer that is at least 50 percent below the average for its industry!

## In the VPP:

- Management commits to operating an effective occupational safety and health management system characterized by four basic elements: management leadership and employee involvement, worksite analysis, hazard prevention and control, and safety and health training.
- Employees agree to participate in the program and work with management to ensure a safe and healthful workplace.
- The site submits an application to Oregon OSHA that describes its system of worker protection.
- Oregon OSHA evaluates the application. Upon acceptance, the agency conducts an onsite review to verify that the safety and health management system meets VPP requirements. With approval comes Oregon OSHA's public recognition of the applicant's exemplary safety and health management system.
- Oregon OSHA also periodically reevaluates the participant to confirm its continuing qualification for VPP. Onsite evaluations are every 2 1/2 to 5 years for Star, 12 to 18 months for Demonstration, and 18 to 36 months for Merit.
- Oregon OSHA removes VPP participants from its programmed inspection lists.
- Oregon OSHA enforcement personnel will investigate workplace complaints, any fatality or catastrophe, and other significant events. After such events, VPP personnel may also review a participant's continuing eligibility for VPP.

## **Will my program qualify?**

We have included a **Self-Assessment Checklist** in this G&A packet. Use this checklist to see if your safety and health management system meets the VPP criteria and to identify and correct any deficiencies or weaknesses that need your attention. Discussing your qualifications with the Oregon OSHA VPP/SHARP Program Manager is also recommended.

## **Won't VPP just mean a lot of extra paperwork that doesn't make my program any better?**

There is some paperwork required in the application process, but we encourage you to use as much existing material as possible. Most worksites have found that, in the process of applying, they gain a greater understanding of worker protection and discover ways to improve their safety and health management system. VPP reviewers don't look for a single correct way to meet VPP requirements. They want to see a system that works for you. Some successful safety and health management systems involve substantial written documentation, and others do not. Small businesses, in particular, often are able to implement excellent safety and health processes with relatively little documentation.

## **How do I apply?**

We have included **Application Instructions** in this G&A packet. We encourage you to involve employees and managers as you complete your application. Submit two copies of your application to :

**VPP/SHARP Program Manager**  
1840 Barnett Rd. Suite D  
Medford OR 97504-8250

After Oregon OSHA reviews and accepts your written submission, an onsite review will be scheduled. The enclosed section on "*What Happens During a VPP Onsite Review?*" describes this process. If you are in a state other than Oregon, check with your state agency to learn specifics regarding its VPP application process.

## **Where can I get more information?**

In Oregon, contact the Oregon OSHA VPP/SHARP Program Manager in our Medford Field Office at 541-776-6016, or visit our VPP page on our website at [www.orosha.org](http://www.orosha.org). The Oregon OSHA VPP/SHARP Program Manager or the VPP Participants' Association (VPPPA) (703-761-1146) can refer you to VPP worksites in your area. We encourage you to contact participating sites. They are happy to share their experience. Outside of Oregon, contact your nearest OSHA VPP Manager through federal OSHA's regional and area offices, or if your worksite is under state jurisdiction, contact the office of your state program. For regional and area office locations, state contacts, and more about VPP, log onto OSHA's website, [www.osha.gov](http://www.osha.gov).

# Benefits of VPP

## Who benefits from VPP?

The foremost beneficiaries of Oregon OSHA's VPP are the workers who, at day's end, arrive home safe and healthy to families who needn't fear the tragedy of worker death, injury, and/or illness.

- **Employers Benefit** – Fewer injuries and illnesses mean greater profits as workers' compensation premiums and other costs plummet.
- **Unions Benefit** – Labor-management cooperation on safety and health sets the tone for improved cooperation in other areas.
- **Industries Benefit** – VPP sites are models of excellence that can influence best practices industry-wide.

*“Organized labor in the Oregon Pulp & Paper industry was a motivating factor behind the VPP Pilot project in Oregon. Labor saw the need for improvement in occupational safety and health, but past history with the manufacturers did not give us confidence in opening lines of communications. We needed a third party to help us develop new safety programs, improve safety training, secure management commitment and hold labor and management accountable. The Oregon-OSHA VPP gave us the tools we needed to help us become successful.”*

*The Voluntary Protection Program is not a generic safety program. VPP calls for a site-specific management system to identify and correct hazards and improve the safety process at a workplace. It's a roadmap for a successful safety program.*

*VPP is a partnership. Labor, management and government committed to working together and recognizing that safety and health are basic worker rights. All workers should be expected to go home, after a day on the job, as healthy and whole as when they went to work. VPP helps us codify these rights.*

*VPP is a journey and a challenge that takes the politics out of safety, strengthens the commitment to safety, and furthers awareness among all employees. VPP challenges us all to be safer today than we were yesterday, and to be safer tomorrow than we were today.”*

**Gary A. McDonough**

Executive Board of AWPPW Local 13

(Association of Western Pulp and Paper Workers)

Georgia-Pacific Pulp & Paper Operations

Toledo, Oregon

## Why partner with Oregon OSHA?

VPP demonstrates that management, labor, and government can work together successfully as partners in excellence. Very few worksites opt out of VPP, despite continuing high performance requirements that Oregon OSHA verifies in comprehensive, periodic onsite reviews at every VPP site. Clearly, participants are pleased with the VPP experience and with the outstanding worker protection they voluntarily achieve year after year.

*“At Marvin Wood Products, our goal is “0” accidents. We felt the SHARP and VPP programs were the best way to achieve that goal. Since starting the journey in 1998, we have achieved a significant reduction in our incident rates. The expertise and support offered by Oregon OSHA enabled us to establish a solid safety foundation. Our safety culture continues to mature through employee involvement and through the strong partnership which evolved with Oregon OSHA during the journey.”*

**Dennis Elder**

Human Resource Manager

Marvin Wood Products

Baker City, Oregon

## Why pursue VPP?

The VPP process of managing safety and health systematically — using one set of flexible, performance-based criteria — is working in workplaces large and small. Nationally, VPP has been effective in various industries — from construction to poultry processing to petrochemical plants, from tree nurseries to nursing homes, and from mom-and-pop operations to federal laboratories. It works in union and non-union shops. More than 180 distinct industrial classifications are represented, and the number is growing. VPP has proven more successful in reducing work-related injuries and illnesses than mere compliance with specific regulations.

*“I have seen the ugly side of workplace fatalities when a company continues to neglect its responsibility to provide a positive employer/employee environment and hazard-free workplace. I have also been very fortunate to be a member of a VPP STAR site from its inception. Companies who realize the benefits of striving for VPP recognition fully appreciate and understand their work force. And, what they achieve in return is the trust and commitment of their employees. VPP represents that conduit to trust and commitment between the employer and employees, the employer and Oregon OSHA, and all parties that do business at workplaces large and small.”*

Joe Gonzales  
Plant Manager  
PWEagle  
Eugene, Oregon

## Does VPP really work?

The evidence of VPP’s success is impressive. Recent data show VPP worksite injuries and illnesses that keep employees away from work or necessitate their restricted work activity or job transfer are dramatically below industry experience. As a result, VPP worksites have saved more than a **BILLION** dollars since the program began in 1982. In addition, many VPP participants report workplace improvements such as lower turnover rates, reduced absenteeism, and improved employee morale.

*“GE Security Tualatin facility employees worked very hard and diligently to earn the VPP’s STAR status. We continue to empower our employees to maintain the high safety standards that drove us toward VPP STAR recognition because GE Security is committed to the health and safety of its employees. Achieving VPP standards has proven to be effective in driving superior health and safety performance, ensuring 100 percent compliance and minimizing injuries. We know VPP works, as evidenced in our ability to work a half million hours without a lost work day or restricted work days injury which resulted in a 93 percent reduction in worker compensation costs.”*

Katherin Moody  
EH&S Manager  
GE Security, Inc.  
Tualatin, Oregon

# VPP Self-Assessment Checklist

The items listed below will help you gauge your eligibility for the VPP. Check each item you currently have or are willing to implement. This self assessment should give you a good idea of what you may need to do to improve your safety and health program — hereinafter referred to as a safety and health management system — and qualify for VPP.

Call the Oregon OSHA VPP/SHARP Program Manager if you have questions about VPP requirements or the application process. Even if you don't have questions, it's a good idea to let the VPP Manager know you are considering applying. A listing of Oregon OSHA offices, including the Central Office, is available online at [www.orosha.org](http://www.orosha.org).

## Rates

- For the most recent 3 full calendar years, calculate:

(1) your Total Case Incidence Rate (TCIR) for recordable nonfatal injuries and illnesses, and

(2) your incidence rate for recordable injury and illness cases involving Days Away from Work, Restricted Work Activity, and Job Transfer (DART rate).\*

\* "DART rate" is the successor term OSHA has adopted to replace Lost Workday Injury (LWDI) rate and Lost Workday Injury and Illness (LWDII) rate. It will also replace DARCIR, which was briefly used within VPP and had the same meaning as LWDII.

- General Industry and State Agencies:** Compare the injury/illness rates with the most current industry average for your NAICS.\*\* The industry average is available through publications and the website of the Bureau of Labor Statistics (BLS). The website address is [www.bls.gov](http://www.bls.gov).

\*\* The North American Industry Classification System (NAICS) replaced the Standard Industrial Classification (SIC). VPP applicant/participant site rates will be compared with the rates generated under NAICS.

If your 3-year TCIR, DART rate, or both are at or above your industry average, you must have a plan to reduce rates to below the industry average. It must be feasible to reduce rates to below the industry average within 2 years.

**If you are a small business**, you may be eligible for the alternative rate calculation. Contact the Oregon OSHA VPP/SHARP Program Manager or review the Oregon VPP **Policies and Procedures** for more details.

- Construction only:** The two calculated rates must include all workers at the site, whether or not they are your own employees. From site inception until time of application, but no less than 12 months, rates must be below the BLS national average for the type of construction at your site.
- If site rates are at or above the industry average, a construction applicant may qualify by demonstrating that the company's 3-year nationwide rates for work in the applicant site's NAICS, or rates for a geographic area approved by Oregon OSHA, are below the industry average.

## Management Leadership and Employee Involvement

- A managerial commitment to worker safety and health protection.
- Top site management's personal involvement.
- A system in place to address safety and health issues/concerns during overall management planning, purchasing and contracting.
- Safety and health management integrated with your general day-to-day management system.
- A written safety and health management system — often referred to as a safety and health manual with policy and procedures specific to your site — appropriate for your site's size and your Industry that addresses all the elements in this checklist.
- A safety and health policy communicated to and understood by employees.
- Safety and health management system goals and results-oriented objectives for meeting those goals.
- Clearly assigned safety and health responsibilities with documentation of authority and accountability from top management to line supervisors to site employees.
- Necessary resources to meet responsibilities, including access to certified safety and health professionals, other licensed health care professionals, and other experts, as needed.
- Selection and oversight of contractors to ensure effective safety and health protection for all workers at the site.

- At least three ways (including safety committees) employees are meaningfully involved in activities and decision-making that impact their safety and health.
- Annual safety and health management system evaluations on VPP elements in a narrative format, recommendations for improvements, and documented follow-up.
- Formal signed statements from all collective bargaining agents indicating support of your application to VPP.
- Where no collective bargaining agent is authorized, written assurance by management that employees understand and support VPP participation.

## Worksite Analysis

- A baseline hazard analysis identifies and documents common hazards associated with your site, such as those found in Oregon OSHA regulations, building codes, and other recognized industry standards and for which existing controls are well-known.
- Documentation within the baseline hazard analysis of your sampling strategy to identify health hazards and accurately assess employees' exposure, including duration, route, frequency of exposure, and number of exposed employees.
- Hazard analysis of routine jobs, tasks, and processes that identifies uncontrolled hazards and leads to hazard elimination or control.
- Hazard analysis of significant changes, including non-routine tasks, new processes, materials, equipment, and facilities, that identifies uncontrolled hazards prior to the activity or use and leads to hazard elimination or control.

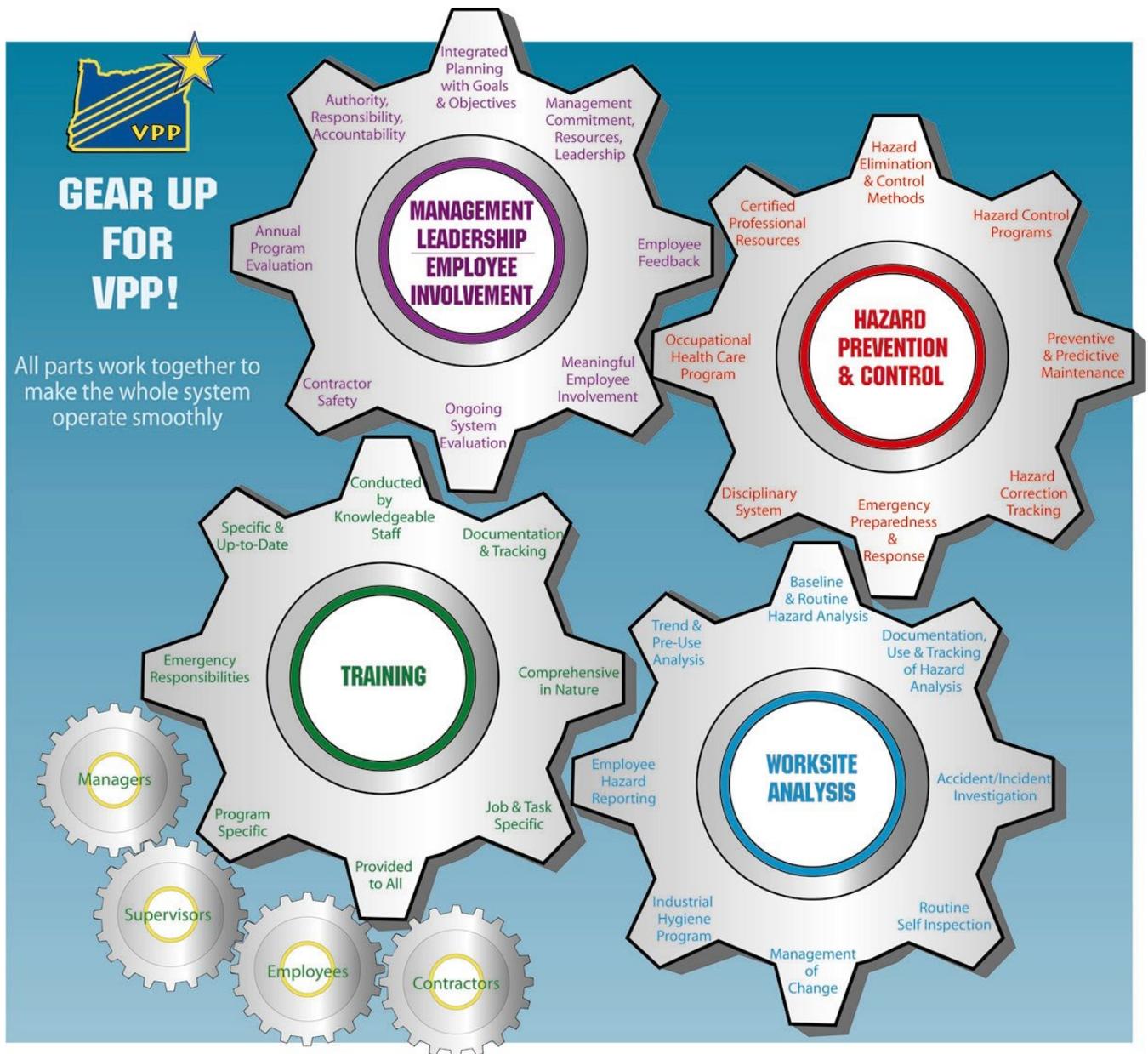
- ❑ Samples, tests, and analyses that follow nationally-recognized procedures.
- ❑ Self-inspections, conducted by trained staff with written documentation and hazard correction tracking, that cover the entire site at least quarterly (weekly for construction).
- ❑ A written hazard reporting system that enables employees to report their observations or concerns to management without fear of reprisal and to receive timely responses.
- ❑ A written industrial hygiene (IH) program to facilitate the identification, analysis, and control of health related hazards. The program should include IH surveys, an ongoing IH sampling strategy, and the use of IH sampling results to control IH related hazards.”
- ❑ Accident/incident investigations conducted by trained staff. Written findings that aim to identify all contributing factors.
- ❑ A system that analyzes injury, illness, and related data — including inspection results, observations, near-miss and incident reporting, first aid, and injury and illness records — to identify common causes and needed corrections in procedures, equipment, or programs.

## Hazard Prevention and Control

- ❑ An effective system for eliminating or controlling hazards. This system emphasizes engineering solutions that provide the most reliable and effective protection. It may also utilize, in preferred order, administrative controls that limit daily exposure, such as job rotation; work practice controls, such as rules and work practices that govern how a job is done safely and healthfully; and personal protective equipment. All affected employees must understand and follow the system.
- ❑ A system for tracking hazard correction. It includes documentation of how and when hazards are identified, controlled or eliminated, and communicated to employees.
- ❑ A written preventive/predictive maintenance system that reduces safety-critical equipment failures and schedules routine maintenance and monitoring.
- ❑ An occupational health care program appropriate for your workplace. It includes, at a minimum, nearby medical services, staff trained in first aid and CPR, and hazard analysis by licensed health care professionals as needed.
- ❑ A consistent disciplinary system that operates for all employees — including supervisors and managers — who disregard the rules.
- ❑ Written plans to cover emergency situations, including emergency and evacuation drills for all shifts.
- ❑ Participants who are covered by the PSM standard must additionally have a Process Safety Management Programs in place for all PSM-covered operations.

## Safety and Health Training

- ❑ Training for managers and supervisors that emphasizes safety and health leadership responsibilities.
- ❑ Training for all employees on the site's safety and health management system, hazards, hazard controls in place, and the VPP.
- ❑ Training that enables employees to recognize hazardous conditions and understand safe work procedures.
- ❑ A method for assessing employee comprehension and training effectiveness.
- ❑ Documentation of all training that individual employees receive.



# What Happens When Oregon OSHA Comes Onsite for a VPP Review?

## Why does Oregon OSHA need to come to my site?

Oregon OSHA must verify that the safety and health management system described in your VPP application is fully operational and effectively addresses the hazards at your site.

## Who comes on a VPP onsite review?

The Oregon OSHA review team usually consists of a team leader, a safety specialist, an industrial hygienist, and often a backup team leader. At larger sites or sites with more complex processes, the team may include additional personnel. Most team members are Oregon OSHA employees. Many teams also include a qualified employee from a VPP participating site. All of these team members are acting in a non-enforcement mode and understand that your site, as an applicant to the VPP, is committed to implementing an outstanding safety and health management system.

## When will Oregon OSHA come?

An Oregon OSHA VPP representative will call you to arrange a mutually convenient time.

## Must I wait until the review ends to learn if the team will recommend approval?

Yes. At the end of each day, however, the team members will discuss the day's findings with your site representatives. The team also will answer questions and detail next steps in the approval process. The Oregon OSHA team will base its final recommendation regarding approval on its comprehensive assessment of your operations in relation to the VPP requirements. To do this,

the team must gather all needed information and complete its review. The Administrator for Oregon OSHA makes the final approval.

## How long will Oregon OSHA stay?

Usually about 4 days, depending on the size of your facility and complexity of your operations.

## What will the team do onsite?

The Oregon OSHA team will perform a review that includes several steps:

- Initial meeting
- Walkthrough to observe working conditions
- Document review
- Formal and informal interviews
- Daily close-out meetings (debriefing)
- Closing meeting

The team may ask you for administrative support and will require private workspace to review documentation, conduct formal employee interviews, and draft a report.

## What happens at the initial meeting?

The team will hold a brief introductory meeting with you, your management staff, and other employees who play key roles in your safety and health efforts. Anyone who may be expected to explain aspects of your safety and health management system should attend. You may want to introduce key staff and provide a brief overview of your site and its safety and health management system. A site tour for the Oregon OSHA review team may follow the initial meeting.

## What is a walkthrough?

The Oregon OSHA review team will walk through pertinent areas of your facility to verify you have controlled hazards appropriately and implemented a comprehensive safety and health management system successfully. There will be an initial primary tour and usually follow-up tours by individual team members.

The team must see enough to understand the hazards that exist and to determine that these hazards are being addressed systematically by your safety and health management system. Any work performed by contract employees is also included in the walk-through. The team will have brief, informal interviews with site and contractor employees as they tour the facility. The informal talks are held close to where employees work to minimize any work interruption. Questions will typically address work procedures, emergency procedures, and personal protective equipment.

## What is the document review?

The Oregon OSHA team will examine records to verify implementation of your safety and health management system. Collecting and organizing these materials beforehand will greatly facilitate the review. The team will need a private area such as a conference room to review the documents. Prior to the onsite visit, the team leader will confer with you about the materials the team will want to see. Documents and programs typically requested during a VPP review include:

- OSHA injury/illness logs for the past 3 full calendar years and year-to-date, with supporting documents such as workers' compensation first reports of injuries, first aid logs, and accident investigation reports. Before the onsite visit, the team leader will provide you a medical access order to post in an obvious place at your site. The team will review site logs for contractors whose employees have worked at the site at least 1,000 hours during any calendar quarter.

- Industrial hygiene sampling records and sampling rationale.
- Evidence of line accountability, such as actual performance evaluations and bonus recognition systems.
- Hazard analyses, such as change analyses, process hazard reviews, job hazard analyses, pre-job safety reviews, and baseline surveys.
- Employee reports of safety and health hazards and suggestions, including documented responses.
- Reports of site inspections and accident/incident investigations, including documented follow-up actions.
- System for preventive and predictive maintenance of workplace equipment and ongoing documentation.
- Emergency procedures, including critiques of drills and responses to any identified deficiencies.
- Safety committee minutes and records of other methods of employee involvement.
- Training records, including types of training given, how you assess employee understanding of the training, and how you track individual training.
- All specialized programs required for compliance with Oregon OSHA rules and regulations, such as lockout/tagout, confined spaces, and respiratory protection.

## **What happens if the team sees apparent violations of Oregon OSHA standards?**

The walkthrough is not an enforcement process. The Oregon OSHA review team will work with you to determine how and when to correct any hazards they see. If you cannot complete corrections while the team is onsite, you will have up to 90 days to correct the hazards and provide documentation of your corrections to the Oregon OSHA team leader. The team will not issue citations. Should all attempts at cooperative resolution fail, however, the team has a responsibility to recommend enforcement action to the Oregon OSHA Administrator.

## **Why does Oregon OSHA need to talk to employees?**

Interviews with management will provide Oregon OSHA team members with information about your safety and health management system and the management oversight system. Employee interviews will help gauge the extent of employee awareness, their involvement in the safety and health management system, and their knowledge about any exposures to hazards. The team leader will randomly select employees from an employee roster, with the goal of interviewing a cross-section of hourly workers, supervisors, managers, and contractors in both operations and maintenance. Each formal interview takes place in a private setting and usually does not exceed 1/2-hour. All questions asked will relate to the safety and health management system.

## **How does the team prepare its findings?**

Prior to the closing meeting, usually on the last full day of the onsite review, the Oregon OSHA team will meet to discuss its recommendation and to draft a report detailing its findings. In determining its recommendation, the team will consider the following:

- Safety and health conditions, including hazards found, plans to correct those hazards, and needed system improvements, if any.
- Information gathered from informal and formal interviews.
- Successful implementation of VPP's elements of an effective safety and health management system.

The team will pay particular attention to consistency — how close the match is — between the safety and health management system described in your application, the documentation provided onsite, workplace conditions, and your employees' experience with the safety and health management system.

The team may determine that you have met all the requirements for one of the following VPP designations: Star, Merit, or Demonstration.

The team may identify site deficiencies related to compliance with Oregon OSHA requirements. You must correct these deficiencies within 90 days or, if you need more than 90 days for certain corrections, have in place interim protection and an agreed upon longer term plan. You must meet this requirement before the Oregon OSHA team will send its report and recommendation to the Oregon OSHA Administrator.

If your site is not eligible for the VPP at this time, the team will suggest that you withdraw your application. The team also will indicate significant areas needing development should you desire to reapply in the future.

## What happens during the closing meeting?

Before leaving, the Oregon OSHA review team and site representatives will meet to discuss team findings and recommendations. In most cases, the team will also provide its draft report. During this meeting, and before the report is sent to the Administrator, the team members will be receptive to any information from you that they may have overlooked or that will help make their findings or report more accurate.

## If the team recommends my worksite to the program, what happens next?

The report goes to the Administrator of Oregon OSHA for approval. The Administrator sends a copy of the final report and a decision letter to your manager, or other appropriate company official, announcing Oregon OSHA's approval of your site for participation in the VPP. After approval, the VPP/SHARP Program Manager will order a certificate and flag and will communicate with you about the best time to present them.

## What if I still have questions?

You can contact the Oregon OSHA VPP/ SHARP Program Manager at Oregon OSHA's Medford Field Office at 541-776-6016. If your worksite is out of Oregon jurisdiction, contact the office that administers your state program. For agency regional and area office locations, state contacts, and more about VPP, go online at [www.osha.gov](http://www.osha.gov).



# VPP Application Instructions

**This Oregon Form is based on the Federal Form Approved OMB# 1218-0239**

Public reporting burden for this collection of information is voluntary and is estimated to average 200 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate, or any other aspect of this collection of information, including suggestions for reducing this burden to the Division of Voluntary Programs, Department of Labor, Room N-3700, 200 Constitution Avenue NW, Washington, DC 20210.

## A. General Information

### 1. Applicant

Site Name  
Site Address  
Site Manager  
Title  
Site VPP Contact for OSHA correspondence  
Title  
Phone Number  
E-mail Address

### 2. Company/Corporate Name

Name (if different from above)  
Address  
VPP Contact (if applicable)  
Title  
Phone Number  
E-mail Address

### 3. Collective Bargaining Agent(s) (list information on each separately)

Union Name and Local #  
Agent's Name  
Address  
Phone Number  
E-mail Address

### 4. Number of Employees and Contractor Employees

Number of Employees working at Applicant's site  
Number of Temporary Employees supervised by Applicant  
Number of Applicable Contractor\* Employees

*\*An Applicable Contractor has employees working 1,000 or more hours in at least one calendar quarter at the Applicant's site.*

### 5. Type of Work Performed and Products Produced

Provide a comprehensive description of the work performed at your site, the type of products produced, and the type of hazards typically associated with your industry.

### 6. Applicant's North American Industrial Classification System (NAICS) Code (3-6 digit number)

Provide your site's NAICS code.

### 7. Recordable Nonfatal Injury and Illness Case Incidence Rates

Complete and submit the tables at the end of this application (Section G), then

- Record your combined 3-year TCIR\*\* here.
- Record your combined 3-year DART\*\* rate here.

*\*\* TCIR is the total case incidence rate for recordable nonfatal injuries and illnesses. The DART rate is the incidence rate for recordable injury and illness cases involving days away from work, restricted work activity, and/or job transfer.*

If, after completing **Table 1**, you determine that your 3-year TCIR, DART rate, or both are at or above your industry average, specify your short- and long-term goals for reducing these rates to a level below the industry average. Include specific methods you will use to address this problem. It must be feasible to reduce rates within 2 years.

- If you are a **small business**, you may be eligible for the alternative rate calculation. Contact the Oregon OSHA VPP/SHARP Program Manager or review the Oregon VPP **Policies and Procedures** for more details.
- Complete **Table 2** for rates of **Applicable Contractors**, listing each contractor individually. This information must be maintained at your worksite and made available to the Oregon OSHA review team during the VPP onsite review. You do not need to submit it with your application.

## B. Management Leadership and Employee Involvement

### Management Leadership

#### 1. Commitment

Attach a copy of your top level safety policy specific to your facility. Note: Management must clearly demonstrate commitment to meeting and maintaining the requirements of the VPP.

#### 2. Organization

Describe how your company's safety and health function fits into your overall management organization. Attach a copy of your organization chart.

#### 3. Responsibility

Describe how your line and staff are assigned safety and health responsibilities. Include examples of specific responsibilities.

#### 4. Accountability

Describe your accountability system used to hold managers, line supervisors, and employees responsible for safety and health. Examples are job performance evaluations, warning notices, and contract language. Describe system documentation.

#### 5. Resources

Identify the available safety and health resources. Describe the safety and health professional staff available, including appropriate use of certified safety professionals (CSP), certified industrial hygienists (CIH), other licensed health care professionals, and other experts as needed, based on the risks at your site. Identify any external resources (including corporate office and private consultants) used to help with your safety and health management system.

#### 6. Goals and Planning

Identify your annual plans that set specific safety and health goals and objectives. Describe how planning for safety and health fits into your overall management planning process.

#### 7. Self-Evaluation

Provide a copy of the most recent annual self-evaluation of your safety and health management system. Include assessments of the effectiveness of the VPP elements listed in these application guidelines, recommendations for improvement, assignment of responsibility, and documentation of action items completed. Describe how you prepare and use the self-evaluation.

## **Employee Involvement**

### **8. Three Ways**

List at least three meaningful ways employees are involved in your safety and health management system, including the safety committee. Provide specific information about decision processes that employees impact, such as hazard assessment, inspections, safety and health training, and/or evaluation of the safety and health management system.

### **9. Employee Notification**

Describe how you notify employees about site participation in the VPP, their right to register a complaint with Oregon OSHA, and their right to obtain reports of inspections and accident investigations upon request. (Various methods may include new employee orientation; Intranet or e-mail, if all employees have access; bulletin boards; tool box talks; or group meetings.)

### **10. Contract Workers' Safety**

Describe the process used for selecting contractors to perform jobs at your site. Describe your system for ensuring that all contract workers who do work at your site are provided the same healthful working conditions and the same quality protection as your regular employees.

### **11. Site Map**

Attach a site map or general layout.

## **C. Worksite Analysis**

### **1. Baseline Hazard Analysis**

Describe the methods used for baseline hazard analysis to identify hazards associated with your specific work environment, for example, air contaminants, noise, or lead. Identify the safety and health professionals involved in the baseline assessment and subsequent needed surveys. Explain any sampling rationale and strategies for industrial hygiene surveys if required.

### **2. Hazard Analysis of Routine Jobs, Tasks, and Processes**

Describe the system used for examination and analysis of safety and health hazards associated with routine tasks, jobs, processes, and/or phases. Provide some sample analyses and any forms used. You should base priorities for hazard analysis on historical evidence, perceived risks, complexity, and the frequency of jobs/tasks completed at your worksite. In construction, the emphasis must be on special safety and health hazards of each craft and phase of work.

### **3. Hazard Analysis of Significant Changes**

Explain how, prior to activity or use, you analyze significant changes to identify uncontrolled hazards and the actions needed to eliminate or control these hazards. Significant changes may include non-routine tasks and new processes, materials, equipment, and facilities.

### **4. Self-Inspections**

Describe your worksite safety and health routine general inspection procedures. Indicate who performs inspections, their training, and how you track any hazards through to elimination or control. For routine health inspections, summarize the testing and analysis procedures used and qualifications of personnel who conduct them. Include forms used for self-inspections.

### **5. Employee Reports of Hazards**

Describe how employees notify management of uncontrolled safety or health hazards. Explain procedures for follow-up and tracking corrections. An opportunity to use a written form to notify management about safety and health hazards must be part of your reporting system.

### **6. Industrial Hygiene (IH) Program**

Describe your written IH program and how it helps facilitate the identification, analysis, and control of health related hazards in your workplace. Include information regarding IH surveys, your IH sampling strategy, the use of sampling results, and the IH expertise available to your site.

## 7. Accident and Incident Investigations

Describe your written procedures for investigation of accidents, near-misses, first aid cases, and other incidents. What training do investigators receive? How do you determine which accidents or incidents warrant investigation? Incidents should include first aid and near-miss cases. Describe how results are used.

## 8. Pattern Analysis

Describe the system you use for safety and health data analysis. Indicate how you collect and analyze data from all sources, including injuries, illnesses, near-misses, first aid cases, work order forms, incident investigations, inspections, and self-audits. Describe how results are used.

# D. Hazard Prevention and Control

## 1. Engineering Controls

Describe and provide examples of engineering controls you have implemented that either eliminated or limited hazards by reducing their severity, their likelihood of occurrence, or both. Engineering controls include, for example, reduction in pressure or amount of hazardous material, substitution of less hazardous material, reduction of noise produced, fail-safe design, leak before burst, fault tolerance/ redundancy, and ergonomic design changes. Although not as reliable as true engineering controls, this category also includes protective safety devices such as guards, barriers, interlocks, grounding and bonding systems, and pressure relief valves to keep pressure within a safe limit.

## 2. Administrative Controls

Describe ways you limit daily exposure to hazards by adjusting work schedules or work tasks, for example, job rotation.

## 3. Work Practice Controls

Describe and provide examples of your work practice controls. These include, for example, workplace rules, safe and healthful work

practices, specific programs to address Oregon OSHA standards, and procedures for specific operations. Identify major technical programs and regulations that pertain to your site, such as lockout/tagout, process safety management, hazard communication, machine guarding, and fall protection.

## 4. Personal Protective Equipment

Describe and provide examples of required personal protective equipment your employees use.

## 5. Safety and Health Rules

Describe your general safety and health rules. Demonstrate that there is a disciplinary system for equitably enforcing these rules for managers, supervisors, and employees.

## 6. Preventive/Predictive Maintenance

Describe your written system for monitoring and maintaining workplace equipment to predict and prevent equipment breakdowns that may cause hazards. Provide a brief summary of the type of equipment covered.

## 7. Occupational Health Care Program

Describe your on-site and off-site medical service and physician availability. Explain how you utilize the services of licensed occupational health care professionals.

Indicate the coverage provided by employees trained in first aid, CPR, and other paramedical skills, their training, and available equipment.

## 8. Emergency Preparedness

Describe your emergency planning and preparedness system. Provide information on emergency drills and training, including evacuations.

## 9. Process Safety Management

If applicable, complete and include the VPP Application Supplement for sites subject to the Process Safety Management (PSM) standard. The supplement can be found on the federal or Oregon OSHA VPP web page.

## E. Safety and Health Training

Describe the formal and informal safety and health training provided for managers, supervisors, and employees. Identify training protocols, schedules, and information provided to supervisors and employees on programs such as hazard communication, personal protective equipment, and handling of emergency situations. Describe how you verify the effectiveness of the training given.

## F. Assurances

VPP applications must include a signed statement affirming that:

### 1. Compliance

You will comply with the **Occupational Safety and Health Act (OSH Act)** and correct in a timely manner all hazards discovered through self-inspections, employee notification, accident investigations, Oregon OSHA onsite reviews, process hazard reviews, annual evaluations, or any other means. You will provide effective interim protection, as necessary.

### 2. Correction of Deficiencies

Within 90 days, you will correct safety and health deficiencies related to compliance with Oregon OSHA requirements and identified during any Oregon OSHA onsite review.

### 3. Employee Support

Your employees support the VPP application. At sites with employees organized into one or more collective bargaining units, the authorized representative for each collective bargaining unit must either sign the application or submit a signed statement indicating that the collective bargaining agent(s) support VPP participation. Oregon OSHA must receive concurrence from all such authorized agents to accept the application. At non-union sites, management's assurance of employee support will be verified by the Oregon OSHA onsite review team during employee interviews.

### 4. VPP Elements

VPP elements are in place, and management commits to meeting and maintaining the requirements of the elements and the overall VPP.

### 5. Orientation

Employees, including newly hired employees and contract employees, will receive orientation on the VPP, including employee rights under VPP and under Chapter 654 or the **OSE Act** or **29 CFR 1960**.

### 6. Non-Discrimination

You will protect employees given safety and health duties as part of your safety and health management system from discriminatory actions resulting from their carrying out such duties, just as 654.062 of the **OSE Act**, Section 11(c) of the **OSH Act**, and **29 CFR 1960.46(a)** protect employees who exercise their rights.

### 7. Employee Access

Employees will have access to the results of self-inspections, accident investigations, and other safety and health data upon request. At unionized construction sites, this requirement may be met through employee representative access to these results.

### 8. Documentation

You will maintain your safety and health management system information and make it available for Oregon OSHA review to determine initial and continued approval to the VPP. This information will include:

- Any agreements between management and the collective bargaining agent(s) concerning safety and health.
- All documentation enumerated under Section III.J.4. of the July 24, 2000 **Federal Register** Notice.\*

\* Reprinted on Page I-24 of this document.

- Any data necessary to evaluate the achievement of individual Merit or 1-Year Conditional Star goals.

## 9. Annual Submission

Each year by February 15, you will submit the following information to the Oregon OSHA VPP/SHARP Program Manager:

### ❑ Participant Rates

- a. For the previous calendar year, the TCIR for injuries and illnesses, and the DART rate (see tables at end of this application).
- b. The total number of cases for each of the above two rates.
- c. Hours worked and estimated average employment for the past full calendar year.

### ❑ Contractor Rates

If you are a general industry or state agency site, you will submit data on each applicable contractor. Applicable contractors are those employers who have contracted with you to perform certain jobs and whose employees worked a total of 1,000 or more hours in at least one calendar quarter at your worksite. The data will consist of:

- a. The site's TCIR and DART rate for each applicable contractor's employees.
- b. The total number of cases from which these two rates were derived.
- c. Hours worked and estimated average employment for the past full calendar year.
- d. The appropriate NAICS code for each applicable contractor's work at the site.

### ❑ Annual Evaluation

A copy of the most recent safety and health annual evaluation. Include a description of any success stories, such as reductions in workers' compensation rates, increases in employee involvement, and improvements in employee morale.

## 10. Organizational Changes

Whenever significant organizational or ownership changes occur, you will provide Oregon OSHA (within 60 days) a new Statement of Commitment signed by both management and any authorized collective bargaining agents.

## 11. Collective Bargaining Changes

Whenever a change occurs in the authorized collective bargaining agent, you will provide Oregon OSHA (within 60 days) a new signed statement indicating that the new representative supports VPP participation.

## G. Rate Calculations and Tables

Follow these steps to complete the two tables below. Submit with your application. You must fill out and submit a Table 2 for each applicable contractor (see step 9).

1. Estimate total hours worked annually by all of your employees for each of the last 3 years. Include temporary and contract employees supervised by your site. Include all overtime and management staff's total hours. Enter in the appropriate places in Column A. Enter the 3-year total at the bottom of Column A.
2. Enter the total number of recordable nonfatal injuries for each of the last 3 years in Column B. Enter the 3-year total.
3. Enter the total number of recordable nonfatal illnesses for each of the last 3 years in Column C. Enter the 3-year total.
4. For each of the past 3 years, combine the injuries and illnesses and enter in Column D. Combine the injury and illness 3-year totals and enter.

5. Calculate your Total Case Incidence Rate (TCIR) for each of the past 3 years and for the 3 years combined. Enter in Column E.

To calculate your TCIR, use the formula  $(N/EH) \times 200,000$  where:

N = Sum of the number of recordable nonfatal injuries plus illnesses in a given time frame (either 1-year for an annual rate or 3 years for a 3-year combined rate).

EH = Total number of hours worked by all employees in a given time frame (either 1-year for an annual rate or 3 years for a 3-year combined rate).

200,000 = Equivalent of 100 full-time workers working 40-hour weeks 50 weeks per year.

For example, to calculate your 3-year combined TCIR:

$$3\text{-Year TCIR} = \frac{[(\#inj + \#ill) + (\#inj + \#ill) + (\#inj + \#ill)]}{[Hours + Hours + Hours]} \times 200,000$$

6. Repeat steps 2 to 4, except substitute injuries and illnesses that resulted in days away from work, restricted work activity, and/or job transfer. Enter in Columns F, G, and H.

7. Calculate your incidence rate for days away from work, restricted work activity, and/or job transfer (the DART rate) for each of the past 3 years and for the 3 years combined. Enter in Column I.

To calculate your DART rate, use the same formula as in 5. above, except:

N = Sum of the number of all recordable injuries plus illnesses resulting in days away from work, restricted work activity, and/or job transfer in a given time frame.

8. To compare your rates with your industry's average rates, enter the industry averages for your SIC code (or your NAICS code after the changeover). The industry average rates are published each year by the Bureau of Labor Statistics in its *Occupational Injuries and Illnesses Bulletin*. This information is also available at the BLS website, [www.bls.gov](http://www.bls.gov).

9. Fill out and submit Table 2 for each **Applicable Contractor** at your site. An applicable contractor is an employer whose employees worked 1,000 or more hours in any quarter at your site during the past full calendar year. For **construction**, all contractors are considered site employees for the purpose of rate calculations, and construction applicants must include them in the tables for site employee rates.

**Table 1. Site Employee Recordable Nonfatal Injury and Illness Case Incidence Rates**

	A	B	C	D	E	F	G	H	I
Year	Total Work Hours	Total # Injuries	Total # Illnesses	Total # Injuries & Illnesses	Total Case Incidence Rate (TCIR) for Injuries & Illnesses	Total # Injuries Involving Days Away from Work, Restricted Activity, and/or Job Transfer	Total # Illnesses Involving Days Away from Work, Restricted Activity, and/or Job Transfer	Sum of Injury & Illness Cases Involving Days Away from Work, Restricted Activity, and/or Job Transfer	Days Away from Work, Restricted Activity, and/or Job Transfer Case Incidence Rate (DART rate)
3 yrs ago (annual)									
2 yrs ago (annual)									
Last year (annual)									
3-Year Totals & Rates									
Current BLS Rates for SIC/NAICS									

**Table 2. Site Applicable Contractors Recordable Nonfatal Injury and Illness Case Incidence Rates**

	A	B	C	D	E	F	G	H	I
Year	Total Work Hours	Total # Injuries	Total # Illnesses	Total # Injuries & Illnesses	Total Case Incidence Rate (TCIR) for Injuries & Illnesses	Total # Injuries Involving Days Away from Work, Restricted Activity, and/or Job Transfer	Total # Illnesses Involving Days Away from Work, Restricted Activity, and/or Job Transfer	Sum of Injury & Illness Cases Involving Days Away from Work, Restricted Activity, and/or Job Transfer	Days Away from Work, Restricted Activity, and/or Job Transfer Case Incidence Rate (DART rate)
Last year Totals & Rates									
Current BLS Rates for SIC/NAICS									

**Note:** Applicable contractor rates do not have to be submitted with your application, but must be maintained at the site for review by the Oregon OSHA VPP Team.

## Section III.J.4. of July 24, 2000 Federal Register Notice:

All pre-approval onsite reviews follow a three-pronged strategy that assesses a site's safety and health program by means of document review, site walkthrough, and employee interviews.

The onsite review will include a review of injury, illness, and fatality records; recalculation and verification of the total recordable injury and illness case incidence rate and the incidence rate for cases involving days away from work and restricted work activity (the two rates submitted with the application); a general assessment of safety and health conditions to determine if the safety and health program adequately protects workers from the hazards at the site; verification of compliance with OSHA and VPP requirements; and verification that the safety and health program described in the application has been implemented effectively.

The review will include random formal and informal interviews with relevant individuals such as members of any safety and health committees, management personnel, randomly selected non-supervisory employees, union representatives, and contract workers.

Onsite document review will entail examination of the following records (or samples) if they exist and are relevant to the application or to the safety and health program (trade secret concerns will be accommodated to the extent feasible):

- a. Written safety and health program;
- b. Management statement of commitment to safety and health;
- c. The OSHA Form 300 log for the site and for all site contractor employees who are required to report;
- d. Safety and health manual(s);
- e. Safety rules, emergency procedures, and examples of safe work procedures;
- f. The system for enforcing safety rules;
- g. Reports from employees of safety and health problems and documentation of management's response;
- h. Self-inspection procedures, reports, and correction tracking;
- i. Accident investigation reports and analyses;
- j. Safety and health committee minutes;
- k. Employee orientation and safety training programs and attendance records;
- l. Baseline safety and industrial hygiene exposure assessments and updates;
- m. Industrial hygiene monitoring records, results, exposure calculations, analyses and summary reports;
- n. Annual safety and health program evaluations, site audits, and, when needed to demonstrate that VPP criteria are being met, corporate audits that a site voluntarily chooses to provide in support of its application. The review of evaluative documents needed to establish that the site is meeting VPP requirements will cover at least the last 3 years and will include records of follow-up activities stemming from program evaluation recommendations;
- o. Preventive maintenance program and records;
- p. Accountability and responsibility documentation, e.g., performance standards and appraisals;
- q. Contractor safety and health program(s);
- r. Occupational health care programs and records;
- s. Available resources devoted to safety and health;
- t. Hazard and process analyses;
- u. Process Safety Management (PSM) documentation, if applicable;
- v. Employee involvement activities; and
- w. Other records that provide relevant documentation of VPP qualifications.