
VPP Corporate Pilot Corporate VPP Application Template

**Voluntary Protection Programs
Directorate of Cooperative and State Programs
Occupational Safety & Health Administration
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VPP Corporate Pilot Corporate VPP Application Template

I. Introduction

The Voluntary Protection Programs (VPP) Corporate Pilot seeks to establish a more efficient process for Corporations to participate in VPP. This pilot is designed to eliminate duplicative VPP application requirements for Corporations with effective safety and health management systems uniformly implemented at its corporate facilities. The VPP Corporate Pilot requires Corporate Applicants to submit a Corporate VPP Application and receive a comprehensive Corporate Program Evaluation at the Corporate-level and eligible corporate facilities (worksites) to submit a streamlined application and receive a streamlined onsite evaluation.

The Corporate VPP Application is intended to capture information that describes how corporate safety and health policies, procedures and systems, consistent with VPP criteria, are uniformly implemented at all of the Corporation's facilities. In addition to traditional VPP elements, a critical component of the VPP Corporate Pilot is for Corporations to have a suitable internal pre-screening process to evaluate their facilities' level of preparedness for participation in the VPP. Pre-screening processes are required for evaluating the implementation of the safety and health management system at the candidate facility and the completeness of the VPP application. These pre-screening processes must be clearly explained in the Corporate VPP Application. A sample pre-screening process is provided in Appendix C.

Following the review of the Corporate VPP Application, an OSHA VPP Team will conduct a Corporate Program Evaluation at the Corporate Office/Headquarters to verify the information provided in the application. Once the Corporation is accepted into the VPP Corporate Pilot, individual facilities of the Corporation that have been successfully pre-screened may begin submitting streamlined applications for VPP membership. This streamlined application requires only facility-specific information and eliminates the need to repeat information contained in the Corporate VPP Application. To ensure that information provided in the Corporate VPP Application is not duplicated by the facility, a checklist is provided in Appendix D for the Corporation to use to identify all standardized information included in the application. The facility should be provided a copy of the completed checklist when preparing their application. The corporate facility will also receive an onsite evaluation from an OSHA VPP Team, which focuses on the facility implementation of the corporate safety and health policies and procedures, and any applicable facility-specific programs.

The following sections of this application contain the required information that Corporate Applicants must submit including general information regarding the Corporation, explanation of how the Corporation meets the eligibility criteria, and a description of all standardized corporate policies and programs. Also, Corporate Applicants must provide a written assurance that as participants in the VPP Corporate Pilot certain obligations will be upheld.

II. Application Form

A. General Information

1. Name of Corporation/Company:		
• Address:		
• Corporate Safety and Health Manager:	• Phone Number:	• E-mail Address:
• VPP Contact Name/Title:	• Phone Number:	• E-mail Address:

2. Total Number of Corporate Facilities In the United States:		
• Number of Facilities in Federal OSHA Jurisdiction:	• Number of Facilities in State Plan Jurisdiction:	
• Number of Employees Employed by the Corporation in the United States (include regular and temporary employees):	• Average Number of Temporary Employees:	• Average Number of Applicable Contractors:

3. Type of Work Performed and Products Produced. List below all major subsidiary companies or business units that follow the corporate safety and health policies.	Standard Industrial Classification (SIC) Code:	North American Industry Classification System (NAICS) Code:

B. Corporate Eligibility

The eligibility for the VPP Corporate Pilot requires the Corporation to make a pledge to strengthen corporate-wide involvement in VPP by bringing a significant number of facilities into the program. Other eligibility requirements include commitment to mentoring and outreach activities, a commitment to participate in the Special Government Employee (SGE) Program, and the ability to effectively pre-screen potential candidate facilities. Each of these requirements must be clearly described, as specified below:

1. Commitment

- Describe your corporate commitment to VPP and plans to implement VPP corporate-wide. Confirm that management commits to meeting and maintaining the requirements of VPP.
- Provide a list of individual facilities and a schedule (if available) for obtaining VPP approval for each facility. If unknown at the time of submitting the application, indicate as such or provide any tentative plans.

2. Pre-Screening

- Provide a description of the established internal process for pre-screening potential VPP facilities, including
 - Process description for conducting a pre-screening audit of the candidate facility. (See Appendix C, for Sample Process)
 - Process description for reviewing applications prior to submission to OSHA.

3. Safety and Health Outreach/Mentoring and SGE Participation

Corporations that are new to VPP describe only planned activities for each of the areas required to be addressed below.

- Describe current and planned outreach activities including providing assistance and information to prospective VPP applicants or involvement in safety and health activities in the community and involvement with organizations such as the National Safety Council, Federal Safety and Health Councils, or Voluntary Protection Programs Participants' Association (VPPPA). (See Appendix A)
- Describe current and planned mentoring activities to assist other prospective VPP participants, internally or to other companies, or a Federal agency such as assisting to improve their safety and health management system. (See Appendix A)

- Describe current and planned participation in the VPP Special Government Employees (SGE) Program and the Corporation commitment to support employee requests for certification as Special Government Employees (SGE) and participation as members of a VPP onsite evaluation team. (See Appendix A)

C. Corporate Commitment and Assurances

1. Demonstration of Corporate Commitment

- *Philosophy:* Provide a written corporate philosophy and vision that integrates requirements for the worker safety and health management systems.
- *Communication:* Provide policy statements, memorandums, and other forms of communication recognizing the importance of safety and health and specify a corporate commitment to occupational safety and health signed by corporate executives or senior managers.
- *Knowledge of Safety and Health Performance:*
 - Describe your system for tracking injury and illness performance at individual facilities, and how this information is used for decision making.
 - Describe how corporate executives and senior managers are informed of safety and health performance (e.g., Annual Performance Report).
- *Responsibility/Organization:*
 - Provide documents that describe (e.g., an organizational chart, a functional chart) how safety and health fits into your organizations' structure. Describe how safety and health is integrated into your business.
 - Describe how responsibility for safety and health is assigned at the corporate level, including the highest safety and health officers, positions to whom they report, and the corporate management position that is/will be responsible for implementing VPP across corporate facilities.
 - Describe how the person(s) responsible for implementing VPP across corporate facilities has knowledge of VPP (for example, OSHA training courses, VPP conferences, workshops).
 - Describe any uniform, corporate-wide policies or guidance that applies across all corporate facilities that prescribe how safety and health line and staff responsibilities are assigned.

- *Accountability:*
 - Describe your performance management system that holds senior leadership and management staff and employees accountable for achieving corporate safety and health goals (e.g., performance plans for executives and senior managers that include safety and health elements). If applicable, describe any uniform, corporate-wide policies for the managing the performance appraisal system.
- *Resource Management:*
 - If applicable, describe your process for planning and budget allocation for safety and health management systems Corporation-wide. For example, describe how resources are assigned for programs, equipment, dedicated safety and health staff, certified safety professionals, certified industrial hygienists, other licensed health care professionals, or other experts needed based on the hazards of the facility.
 - If applicable, describe corporate office resources, consultants, or other resources used to help with your safety and health management system, and how they are used by the corporate facilities.
- *Corporate Goals and Performance Report*
 - Describe your system for establishing annual performance goals, tracking system to evaluate the status of these goals, and any type(s) of corporate report(s) (e.g., annual) issued that describes accomplishments.
 - Describe any uniform, corporate-wide policies that are implemented across all corporate facilities that prescribe how safety and health planning or goal setting is performed at facility-level.
 - Describe any uniform, corporate-wide policies that are implemented across all corporate facilities that prescribe how VPP self-evaluations are conducted and how the results are evaluated and implemented.
- *Corporate Environmental, Safety and Health Certifications*
 - Describe, if applicable, any other types of certifications the Corporation maintains that demonstrate excellence in environmental, safety and health such as accreditation with the International Organization for Standardization (ISO).

2. Written Assurances

- VPP applicants must assure, that they understand and agree to fulfill program requirements as participants in the VPP Corporate Pilot related to: OSHA Act compliance, employee support for VPP application, meeting and maintaining VPP elements, employee rights, non-discrimination, employee access to records, OSHA access to documentation, providing annual data, and informing OSHA of organizational and collective bargaining changes by signing and submitting the form included in Appendix B. The assurances must be signed by a Senior Corporate Official. Signature by the Senior Corporate Safety and Health Officer is acceptable.

D. Employee Involvement and Contractors

1. Employee Involvement

- *Involvement:* Describe any uniform, corporate-wide policies that apply across all facilities that prescribe how employees should be meaningfully involved in safety and health management systems at those locations.
- *Notification:* Describe any uniform, corporate-wide policies that apply across all facilities that prescribe how employee notification takes place at those locations or for Corporation new to VPP describe how notification will be conducted.
 - *Orientation:* Describe how employees at participating facilities, including newly hired employees and contract employees, receive or will receive orientation on the VPP, including employee rights under VPP and under the Occupational Safety and Health (OSH) Act or 29 CFR 1960.
 - *Non-Discrimination:* Describe how employees are notified or will be notified of their rights and the protections afforded to employees given safety and health duties as part of your safety and health management systems from discriminatory actions resulting from their carrying out such duties, as described in Section 11(c) of the OSH Act and 29 CFR 1960.46(a).
 - *Records Access:* Describe how employees are notified or will be notified of their right to access 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.

2. Contractors

- Describe the corporate process for selecting contractors to perform jobs throughout the Corporation (all facilities.)
- Describe any uniform, corporate-level policies for contractor management and oversight at all corporate facilities.

E. Corporate Safety and Health Management System

Describe safety and health policy, procedures and systems that are consistently and uniformly implemented throughout the Corporation (all facilities.) Program descriptions must contain pertinent information that clearly explains the management and administration of the program such as responsibilities and types of documentation maintained. In some cases, a table of contents that lists program components may be suitable supporting documentation to attach with the written description of the program.

1. Worksite Analysis

For each element listed in this section, describe any corporate policies or procedures which pertain to or prescribe the way each element should be conducted across your Corporation's facilities. If you do not have a corporate-level policy regarding an element, indicate that there is no corporate-wide policy for the element.

- *Hazard Analysis of Routine Jobs, Tasks, and Processes*
- *Hazard Analysis of Significant Changes*
- *Self-Inspection*
- *Employee Reports of Hazards*
- *Accident and Incident Investigations*
- *Trend/Pattern Analysis*

2. Hazard Prevention and Control

For each element listed in this section, describe any corporate policies or procedures which pertain to or prescribe the way each element listed below should be conducted across your Corporation (all facilities). If you do not have a corporate-level policy regarding an element, indicate that there is no corporate-wide policy for the element.

- *Engineering Controls*
- *Administrative Controls*
- *Work Practice Controls*
- *Personal Protective Equipment*
- *Safety and Health Rules*
- *Preventive/Predictive Maintenance*
- *Occupational Health and Care Program*
- *Emergency Preparedness*
- *Written Safety and Health Programs (e.g. Hazard Communication, Lockout/Tag out. See Appendix D, Corporate VPP Application Checklist)*

3. Safety and Health Training

- Describe any safety and health training programs administered from the corporate-level, and any conferences, seminars, workshops implement regarding safety and health. Describe which courses, if any, are mandatory for managers, supervisors, or employees.
- Describe any uniform, corporate-wide policies that apply across all corporate facilities pertaining to the formal and informal safety and health training provided for managers, supervisors, and employees.

F. Renewal

- OSHA will develop a process for renewal of VPP Corporate recognition and will renew the Corporation's participation in VPP Corporate Pilot every 3 -5 years. This renewal is required for remaining active in for VPP Corporate Pilot.
- Annually submit, by February 15, a copy of the most recent Annual Corporate Safety and Health Report. This report should include a description of any success stories, such as reductions in workers' compensation rates, increases in employee involvement, and improvements in employee morale.

1. Outreach:

- VPP-Related Outreach – Assistance and information provided to prospective VPP applicants, including, but not limited to: conducting VPP workshops at conferences, providing training in support of the VPP, holding community safety days, and serving as an advocate in the business community for the VPP.
- Outreach (Other) – Assistance and information provided to either other internal corporate entities or external corporations to promote general safety and health principles and practices, including, but not limited to: participation in OSHA Strategic Partnerships and Alliances, making presentations on safety and health issues at conferences, or conducting training workshops.

2. Mentoring:

- Informal Mentoring – One-on-one assistance from a VPP participant to a prospective VPP participant (from their own company or someone from another company) to help them improve their safety and health management system and/or prepare an application for VPP.
- VPPPA Formal Mentoring – One-on-one assistance from a VPP participant to a prospective participant from another company to help them improve their safety and health management system and/or prepare an application for VPP. This program is administered by the VPPPA. (Adapted from VPP Technical and Educational Directive, page 1-4)

3. Special Government Employee (SGE) Program:

- An applicant to the VPP Corporate Pilot must demonstrate a commitment to supporting employees from their organization to receive training and being certified to become Special Government Employees (SGE) and to provide these individuals' services as members of a VPP onsite evaluation team.

4. Pre-Screening Processes:

- Applicants to the VPP Corporate Pilot must have a system to evaluate potential candidate facilities against the VPP requirements. The pre-screening evaluation must include a worksite auditing system to identify program deficiencies that do not to satisfy VPP criteria for the Merit or Star Level. A pre-screening process must also be established to review and determine the completeness of the candidate facilities' VPP application prior to submission to OSHA.

5. **Temporary Employees.** Employees hired on a non-permanent basis by the applicant/participant site.
6. **Applicable Contractors:** Those employers hired to provide services and whose employees worked a total of 1,000 or more hours in at least 1 calendar quarter at your worksite.
7. **Contract Employees.** Workers who are employed by a company that provides services under contract to the VPP applicant or participant, usually at the VPP applicant's or participant's worksite.

(Additional Definitions to be Added)

Appendix B

Written Statement of Assurances

In signing this document, the management of [insert company name], hereby assures that:

- We will comply with the Occupational Safety and Health Act (OSH Act) and correct at all our facilities, in a timely manner all hazards discovered through self-inspections, employee notifications, accident investigations, OSHA onsite reviews, process hazard reviews, annual evaluations, or other means. (Federal applicants must also agree to comply with Title 29 of the Code of Federal Regulations (CFR), Part 1960 – Basic Program Elements for Federal Employees).
- We are committed to doing our best to provide outstanding safety and health protection to our employees through effective safety and health management systems and employee involvement.
- Any employee with safety or health related duties will be protected from discriminatory actions resulting from these duties, just as Section 11(c) of the Act and 29 CFR 1960.46(a) protect employees who exercise their rights.
- We agree to provide the necessary safety and health and VPP information to the OSHA Onsite Evaluation Team. We agree to retain these records until OSHA communicates its decision regarding initial VPP participation. (OSHA Federal Register Notice 65:45649-45663)
- We understand that any materials we feel are confidential or revealing of trade secrets, OSHA will view in accordance with trade secret laws and ensure information does not become subject to Freedom of Information Act requests.
- We will follow renewal process required by OSHA to remain in the VPP Corporate Program.
- We will annually submit by February 15th a copy of the most recent Annual Corporate Safety and Health Report that includes new information and any major achievements and successes in our safety and health management systems.
- Withdrawal – We understand that we may withdraw our participation at any time for any reason should we deem that desirable.

We, the undersigned, respectfully submit this statement of assurances and request consideration for participation in the Voluntary Protection Programs.

Signature: _____

Title: _____

Date: _____

Signature: _____

Title: _____

Date: _____

Signature: _____

Title: _____

Date: _____

Appendix C

Sample VPP Pre-Screening Process

The next section provides the process used by Georgia Pacific (GP) Corporation to prepare GP facilities for application for VPP membership. Also, comprehensive checklists are used by GP to evaluate the implementation of the safety and health management system. Several of these checklists are provided as examples.

1.0 PURPOSE

To provide a step-by-step procedure for Georgia-Pacific Corporation locations to certify and maintain their VPP certifications.

2.0 PROCESS

2.1 INITIAL DECISION

2.1.1 The VPP process begins with the decision by the facility management and employees/union to pursue VPP certification. This pursuit includes a thorough review of the programs, physical facility, and management systems, and may entail substantial upgrading of any one or all of these. It will ultimately result in the preparation and submission of a VPP Application. The Corporate VPP Managers in the Corporate Safety Office or the nearest OSHA Regional (or State) Office can assist the GP facility with questions about the application guidelines.

The facility should contact the appropriate VPP manager and their divisional HR Director/VP to obtain the proper authorization to pursue VPP and ensure the proper resources are allocated.

2.1.2 The VPP coordinator for the facility will help coordinate a structured plan of action. A review of the facility's safety performance will include a comparison of the facility total case (TCIIR) and days away and restricted (DART) incidence rates for the most recent 3 years against the most recently published BLS rates for the facility SIC.

2.2 PREPARATIONS AND APPLICATION SUBMITTAL

2.2.1 An initial on-site comprehensive review will be conducted by a VPP Manager or Corporate Safety representative to assess and establish a baseline for the facility. The review will include a detailed examination of the written safety programs to ensure they are site-specific and reflect the current processes of the facility. The VPP manager and/or Corporate Safety representative will advise the facility on the proper presentation of the written programs and documentation. This is most commonly referred to as the Binder System (see appendix A). Interviews will be conducted of

facility management and employees to assess the level of knowledge and interest in safety and VPP. In addition, a detailed inspection will be conducted of the physical facility. Areas of concern will be identified and the VPP manager and/or Corporate Safety representative will assist the facility in determining the best course of action to address any issues.

- 2.2.2 The Binder System is a foundation to the VPP application and certification maintenance process. Simply put, this system is a well-organized, systematic method of presenting and maintaining all documentation of necessary written programs, inspections and corrective actions, and training. It is composed of a set of 3-ring binders, each devoted to a safety-related subject area. A detailed guideline has been included at the end of this APM to assist the facility in this process. (It should be noted that this is a guideline. If a binder is listed and does not apply to your facility then it is not required that it be included. The facility may also choose to expand and include a binder not listed in the guideline.) The main purpose of the Binder system is to provide the facility with a method to quickly and efficiently access documentation needed to create the VPP application. It will also serve the facility during the OSHA on-site review as well as during future Corporate Safety evaluations.
- 2.2.3 The VPP Application is constructed by the facility with guidance from the VPP manager. It is vital that the facility follows the appropriate application format for their OSHA Region or State Plan. While similar, each State Plan or Region follows its own format. The VPP manager or OSHA contact can advise the facility as to the proper format.

Once the VPP Application is completed, and prior to submission to the nearest OSHA Region (or State Plan) Office, it must be reviewed by the appropriate Corporate VPP Manager to ensure that it is ready for OSHA's review. This is to ensure, as well, that all appropriate documents, exhibits, and/or attachments are properly included.

Upon final review by the appropriate VPP Manager, two (2) copies of the VPP Application should be prepared and submitted to the nearest OSHA Region (or State Plan) Office. This review process could take up to forty-five (45) days.

2.3 ONSITE REVIEW

- 2.3.1 Upon final review and acceptance by OSHA, an OSHA VPP representative will contact the facility to set up a mutually agreeable on-site evaluation date. OSHA must visit the facility to verify that the safety and health programs described in the VPP Application are fully operational and address all potential hazards at the facility. This evaluation will include a thorough review of the OSHA Logs and back-up medical documentation; an appraisal of written site-specific programs, an assessment of the facility's physical conditions, interviews of management and employees, both formally and informally, and the preparation of a draft report.
- 2.3.2 The on-site portion of the review typically takes about four (4) days. The OSHA on-site Team consists, at a minimum, of a Team Leader, Safety Specialist, and an Industrial Hygienist, and if a PSM-covered process, a PSM Specialist. The Team will hold a brief introductory meeting with the facility's key management and employee representatives. Employees who are accountable for meeting or maintaining VPP requirements should also attend. During the opening conference, the facility should give a brief overview of the site layout and processes, the safety system, and highlight any particular achievements.
- 2.3.3 Normally one to two days of the on-site week will consist of program reviews, while one to two days are devoted to the physical inspection. Employee interviews are conducted off and on all week. The onsite team normally has lunch with representatives of the facility, featuring a "best practice" safety presentation conducted by non-management personnel.
- 2.3.4 Before leaving, the Team will have a closing meeting to discuss its findings and recommendations. If Team members think that additional work needs to be done before approval into VPP, they may make 90-day recommendations for the work to be completed.

If Team members determine that a major component of one or more of the required elements is missing, the Team will recommend Merit rather than Star level certification, and recommend Merit Goals that the site must complete.

General recommendations may be made regarding enhancements/improvements in the safety and health programs.

2.4 CONDUCT

- 2.4.1 Conduct during the VPP on-site should be maintained at a professional level at all times. It is important to remember that the OSHA team is at the facility because they were invited to be there. OSHA is not there on a compliance or complaint review. As part of the VPP commitment, we agree to work with OSHA to resolve any issues or concerns that may arise during the on-site review. If a disagreement occurs, instead of engaging the OSHA team, refer to the VPP manager or Corporate Safety representative assisting with your on-site for guidance in resolving the issue.
- 2.4.2 OSHA uses the employee roster to select employees for the formal interviews. The facility needs to provide OSHA with an accurate list of employees including identifying specific employees such as committee members, union officials, etc. This will help the on-site team ensure they have a chance to interview the VPP leadership of the facility. If a selected employee has concerns about talking with OSHA let the team leader know and he or she may choose to make another selection.

2.5 FOLLOW-UP

- 2.5.1 The facility must follow up to ensure that all 90-Day items are completed on time and OSHA is notified of the completed items. This will ensure the final report is not delayed. If a facility is recommended for Merit then the OSHA on-site team will establish specific Merits Goals that must be completed within an 18-24 month period. Completion and status of these goals must be communicated to the appropriate VPP Manager and OSHA. Once the Merit Goals are completed OSHA will then coordinate an on-site visit to verify completion of the Merit Goals and to ensure all other VPP criteria has been maintained before upgrading the facility to VPP Star level.

2.6 CERTIFICATION

- 2.6.1 The OSHA VPP team's on-site report is reviewed at Region and National level before the facility is notified of its official certification at Star or Merit level in a letter from the Assistant Secretary of Labor, USDOL. State Plans have a similar state-level review and notification process.
- 2.6.2 When notified of the official certification, the facility should contact its VPP Manager and Corporate Communicator to arrange for a celebration event during which OSHA will present the Star or Merit certificate and flag to the facility.

2.7 RECERTIFICATION

- 2.7.1 Recertification of a VPP Merit site is normally conducted on an 18-24 month schedule.
- 2.7.2 Recertification of a VPP Star site is normally conducted on a 3 to 5 year schedule, depending on the strength of the Star program at the facility and the policy of the Region or State Plan. First time certifications can expect a third year review.
- 2.7.3 Recertifications normally follow the same process as the original on-site. This includes a complete review of the written, site-specific safety programs, tracking systems, management systems, physical inspection of the facility, and employee interviews. The recertification on-site is 3-4 days with a team of at least 3 members.

At the time of this revision, Region IV OSHA has a pilot program for recertifications for sites that meet specific requirements. The program is referred to as the “OSHA Day.” Facilities that have maintained excellent safety programs, have experienced a low number of injuries, and have not experienced any major changes or events may qualify for this program. Those facilities meeting the requirements will undergo recertification during a one-day visit. OSHA will focus on a small number of safety programs, conduct interviews with a limited number of employees, and will conduct a streamlined physical inspection. The facility will not know which programs are to be reviewed until the actual on-site.

2.8 ANNUAL REPORT

- 2.8.1 Each Merit and Star site must file an annual VPP Report to OSHA by February 15th of each year. Each Region or State Plan has a format specific to their program. The VPP Manager, Corporate Safety Team member, or OSHA representative will advise you as to which format to utilize. A copy of the Annual Report should be forwarded to the appropriate VPP Manager for review. The Annual Report informs OSHA of the facility’s updated TCIIR and DART rates, changes in key personnel or processes, safety activities, accomplishments, and goals. It also demonstrates the facility’s continued commitment to VPP and safety.

1. REVIEW OF MANAGEMENT SYSTEMS

1.1. OSHA RECORDKEEPING (APM-131)

- ___ Location is following current federal guidelines for OSHA Recordkeeping.
- ___ OSHA 300 is posted from February 1 – April 30.
- ___ OSHA 300/200 entries are consistent with medical, first aid, accident investigations, & medical reports.
- ___ OSHA Form 301/101 or equivalent form is on file for each entry on the log.
- ___ OSHA poster is displayed in a readily accessible area of the facility.

1.2. ACCIDENT INVESTIGATIONS (APM-121)

- ___ Location has written Accident Investigation Procedure with assigned responsibilities.
- ___ Recordable, first aid, property damage and near miss injuries/events are all investigated.
- ___ Root causes are identified in each accident investigation report.
- ___ Corrective actions to eliminate root causes are identified in each accident investigation report.
- ___ Accountability is assigned for implementing each corrective action, with timetables.
- ___ Tracking system exists to ensure that corrective actions are made in timely manner.
- ___ Individuals involved in accident investigation are trained.
- ___ Investigation report indicates when corrective measures were taken and by whom.

1.3. SAFETY & HEALTH PROGRAM PLANNING (APM 341)

- ___ Location has a current Safety Action Plan (SAP).
- ___ Management has set goals and activities to improve safety & health performance.
- ___ Above goals and activities are reviewed quarterly and updated annually.

- ___ Trends of injuries & illnesses by dept., job title, nature of injury, etc., have been analyzed.
- ___ A site-specific action plan is being followed to reduce injuries & illnesses where trends are high.
- ___ Facility has written procedures for doing JHAs and SOPs with assigned responsibilities.
- ___ Job hazard analyses (JHAs) have been conducted for the most hazardous jobs.
- ___ Written safe operating procedures (SOPs) based on JHAs are in place.
- ___ JHAs and SOPs are reviewed when accidents occur and revisions made if determined to be necessary.
- ___ Individuals involved in writing/reviewing JHAs/SOPs have been trained.
- ___ Facility has written procedures for inspections with assigned responsibilities.
- ___ Individuals involved in inspections have been trained in inspection techniques.
- ___ Supervisors are personally involved in periodic self-inspections.
- ___ Routine self-inspections with written reports are conducted at least monthly.
- ___ Tracking system exists to ensure findings from JHAs and inspections are adequately addressed to conclusion.
- ___ Facility has written procedures for pre-use analysis of new equipment and chemicals.
- ___ Evaluation of equipment and processes (new) prior to use is documented.

1.4. MANAGEMENT COMMITMENT (APM 341)

- ___ Top management periodically participates in safety meetings and inspections.
- ___ Top management reviews accident reports and safety committee minutes.
- ___ Production meetings are opened with discussion of safety performance and activities.
- ___ Crew safety meetings are held regularly for all departments, with written minutes kept.
- ___ Safety and health rules specific to the location are written, posted and communicated to all employees.

- ___ Specific safety & health responsibilities have been assigned for all levels of management.
- ___ Annual evaluations (all management levels) are based upon performance of these specific responsibilities.
- ___ Disciplinary action is taken for safety and health infractions and this is documented.

1.5. EMPLOYEE INVOLVEMENT (APM 341)

- ___ Location has joint management-employee safety committee that meets regularly.
- ___ Written minutes of safety committee meetings are kept and action items tracked for follow-up until completed.
- ___ Safety committee members are trained in all safety and health functions they are expected to perform.
- ___ Safety committee members participate in walk-around inspections, JHA/SOP completion/review and accident investigations.
- ___ Location has system for employees to notify management of hazards with adequate, timely and documented response.
- ___ Tracking system exists to ensure adequate and timely responses to employee safety concerns.

1.6. SAFETY & HEALTH TRAINING (APM-383)

- ___ Location has an annual schedule for training that ensures all OSHA-required topics are covered.
- ___ Training pertinent to the location as identified in APM #383 is provided.
- ___ New employee orientation is conducted and documented.
- ___ Tracking system exists to ensure all supervisors and employees get pertinent training.
- ___ Documented training is provided on all specific topics, substances, etc. upon transfer to a new position.
- ___ Make-up sessions are held for employees who miss scheduled OSHA-required training.
- ___ Documentation exists for class content (lesson plans or minutes) & understanding (tests, observation).

- ___ Record of employee attendance at training is maintained with signatures (sign-off forms, rosters). Tracking system exists to ensure all supervisors and employees get pertinent training.
- ___ Employee feedback about the training is obtained using evaluations or other methods.
- ___ The training program is evaluated and updated at least annually based on employee
- ___ Feedback, observation of training effectiveness and new or revised regulations.

2. SAFETY PROGRAMS:

2.1. PERSONAL PROTECTIVE EQUIPMENT (APM-351)

- ___ Location has a written certified hazard assessment that identifies the PPE required for each job, task, or area.
- ___ The hazard assessment identifies the location, date, and signature of the certifying person.
- ___ Each employee (new, transferred, when PPE requirements change, or at least annually) who is required to wear PPE is trained in the limitations, use, care and disposal of the PPE.
- ___ Written certification is maintained that the employee understood the training, which identifies the subject of the training, the date conducted, trainer's signature, and the names of the employees trained.
- ___ Location has an inspection system that ensures that all defective PPE is removed from service.

Appendix D

Corporate VPP Application Checklist

The checklist below serves a dual purpose. It provides guidance for applicants on the type of information to provide in the Corporate VPP Application for each VPP element and sub-element. The checklist should also be used by the Corporate Office/Headquarters to inform candidate facilities applying for VPP, the information provided in the Corporate VPP Application. This coordination will eliminate duplication of effort and ensure only necessary information is provided at the Corporate-level and at the facility-level.

For elements below, describe in detail specific information that clearly explains how the requirement is being satisfied. Include information such as responsibilities, tracking, reporting, and recordkeeping. Submit with the application sample documents such as memorandums, charts, brief reports, or any other forms of written communication that demonstrate corporate fulfillment of requirements for these elements. In most cases, listing of key elements and a brief description of each or including a table of contents is adequate. Do not submit lengthy written programs or procedures. The complete written policy/ plan/program/procedure may be reviewed during the OSHA Corporate Program Evaluation.

ELEMENT	SUGGESTED FORMAT	YES	NO
Corporate Eligibility			
Commitment to VPP	Describe policy Attach a list of facilities and a schedule (time-table) for obtaining VPP approval		
Prescreening Processes (Facility and Application)	Attach process description and table of contents or outline main sections		
Outreach/Mentoring	Attach a list of current and/or planned outreach and mentoring activities.		
Special Government Employee (SGE) Participation	Attach a list of current and/or planned SGE participation.		
Corporate Commitment			
Philosophy	Provide written philosophy		
Communication	Provide examples of written communication that describes corporate commitment to worker safety and health.		
Knowledge of Safety and Health Performance	Summarize policy for reporting safety and health performance to senior managers. Attach table of contents of reports and other types of information		
Responsibility/Organization:	Provide organization chart/list policy that establishes responsibilities for safety and health		

ELEMENT	SUGGESTED FORMAT	YES	NO
Accountability	Define responsibilities of managers and employees and provide examples of performance standards		
Resource Management	Describe policy and process for planning allocation of budget		
Corporate Goals and Performance Report	Attach table of contents from report such as strategic plan, annual report, etc.		
Corporate Environmental, Safety and Health Certifications and Awards	List all applicable certifications and awards		
Employee Involvement and Contractors			
Employee Involvement	Summarize policy and provide examples		
Notification: <ul style="list-style-type: none"> ▸ Orientation ▸ Non-Discrimination ▸ Records Access 	Summarize policy Attach any examples of notification documents		
Contractors	Summarize policy, responsibilities List of specific rules/regulations		
Worksite Analysis			
Hazard Analysis of Routine Jobs, Tasks, and Processes	Describe responsibilities, frequency, documentation, corrective actions, inspection forms, tracking		
Hazard Analysis of Significant Changes,	Describe responsibilities, frequency, documentation, corrective actions, inspection forms, tracking		
Routine Self-Inspections	Describe responsibilities, frequency, documentation, corrective actions, inspection forms, tracking		
Hazard Reporting System for Employees	Summarize process, attach sample forms (if applicable)		
Investigation of Accidents and Near-Misses	Describe responsibilities, procedure and investigation guidelines, investigation forms, follow-up Attach sample forms (if applicable)		
Trend/ Pattern Analysis	Summarize process Attach sample analysis report or outline of key sections		
Hazard Prevention and Control			
Engineering Controls	Describe policy List/describe key elements		

ELEMENT	SUGGESTED FORMAT	YES	NO
Administrative Controls	Describe policy List/describe key elements		
Work Practice Controls and Hazard Control Programs	Describe program responsibilities List/describe key elements		
Personal Protective Equipment (PPE)	Describe program - responsibilities List/describe key elements		
Safety and Health Rules	Describe awareness, enforcement, disciplinary procedures		
Preventive/Predictive Maintenance	Describe program - responsibilities Attach table of contents List/describe key elements		
Occupational Health Care Program	Describe program – responsibilities Attach table of contents List/describe key elements		
Emergency Preparedness	Describe program – responsibilities List/describe elements of Emergency Action Plans List/describe elements of Emergency Evacuation Procedures		
Safety and Health Written Programs			
▸ Recordkeeping and Posting	Describe responsibilities List records maintained and posting requirements		
▸ Hazard Communication	Describe policy Attach table of contents List/describe key elements		
▸ Blood borne Pathogens	Describe policy Attach table of contents List/describe key elements		
▸ Employee Exposure Assessment/Industrial Hygiene	Describe policy Attach table of contents List/describe key elements		
▸ Confined Space Entry	Describe policy Attach table of contents List/describe key elements		
▸ Trenching and Excavation	Describe policy Attach table of contents List/describe key elements		
▸ Elevated Work and Fall Protection	Describe policy Attach table of contents List/describe key elements		
▸ Mobile Equipment and Material Handling	Describe policy Attach table of contents List/describe key elements		

ELEMENT	SUGGESTED FORMAT	YES	NO
▸ Respiratory Protection	Describe policy Attach table of contents List/describe key elements		
▸ Hearing Conservation	Describe policy Attach table of contents List/describe key elements		
▸ Personal Protective Equipment	Describe policy Attach table of contents List/describe key elements		
▸ Asbestos and Lead Management	Describe policy Attach table of contents List/describe key elements		
▸ Fire Prevention and Protection	Describe policy Attach table of contents List/describe key elements		
▸ Hot Work Permitting	Describe policy Attach table of contents List/describe key elements		
▸ Electrical Safe Work Practices	Describe policy Attach table of contents List/describe key elements		
▸ Spill Release and Prevention	Describe policy Attach table of contents List/describe key elements		
▸ Emergency Evacuation Plan	Describe policy Attach table of contents List/describe key elements		
▸ Ergonomic Awareness Program	Describe policy Attach table of contents List/describe key elements		
▸ Process Safety Management	Describe policy Attach table of contents List/describe key elements		
▸ Lockout/Tagout	Describe policy Attach table of contents List/describe key elements		
▸ Fleet Safety	Describe policy Attach table of contents List/describe key elements		
List any others below:			

ELEMENT	SUGGESTED FORMAT	YES	NO
Safety and Health Training			
▸ Managers	Describe policy Attach list of all required training		
▸ Supervisors	Describe policy Attach list of all required training		
▸ Employees	Describe policy Attach list of all required training		

Appendix E
Annual Corporate Safety and Health Report

(To be added)