

VPP: Recognizing Excellence in Safety and Health

Voluntary Protection Programs An OSHA Cooperative Program

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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 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 OSHA's Voluntary Protection Programs.

VPP is open to private sector and federal agency worksites in most industries where OSHA has jurisdiction.

THE PROGRAMS

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 VPP-quality safety and health protection that want to test alternatives to current eligibility and performance requirements.

THE VOLUNTARY PROTECTION PROGRAMS CONCEPT

VPP is one of several OSHA cooperative programs that encourage private and public sector efforts to improve occupational safety and health. Through VPP, OSHA recognizes workplaces with excellent safety and health management systems and promotes them as model workplaces. The Programs place significant reliance on the cooperation and trust inherent in partnership and complement the agency's regulatory and enforcement efforts.

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

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

For employers, achieving VPP shows your employees, industry, and community that 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 OSHA benefits all parties.

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 employee 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.

Using one set of flexible, performance-based criteria, the VPP process emphasizes management accountability for worker safety and health, continual identification and elimination of hazards, and 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. Companies and individual sites choosing to apply for VPP recognition show their commitment to effective worker protection by inviting a government regulator into their workplace. In return, OSHA removes them from programmed inspection lists and does not issue them citations for standards violations that are promptly corrected.

Sites qualifying for VPP 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 since the Programs began, the average VPP worksite has had a recordable incidence rate for days away from work, restricted work activity, and/or job transfer (DART rate) about 50 percent below the average for its industry!

In 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 OSHA that describes its system of worker protection.
- OSHA evaluates the application. If OSHA accepts it, the agency then conducts an onsite review to verify that the safety and health management system meets VPP requirements. With approval comes OSHA's public recognition of the applicant's safety and health management system.

- OSHA periodically reevaluates the participant to confirm its continuing qualification for VPP. Onsite evaluations are every 2 1/2 to 5 years for Star, 18 to 24 months for Merit, and 12 to 18 months for Demonstration.
- OSHA removes VPP participants from its programmed inspection lists.
- 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.

Won't VPP just mean a lot of extra paperwork?

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.

Will my program qualify?

Use the **Self-Assessment Checklist** to see if your safety and health management system meets the VPP criteria. This checklist is a useful tool to help you identify and correct any deficiencies or weaknesses that need your attention. We also recommend that you discuss your qualifications with your Regional VPP Manager or Coordinator.

How do I apply?

We have included **Application Instructions**. We encourage you to involve employees and managers in completing your application. After OSHA reviews and accepts your written submission, we will schedule an onsite review. This process is described in "What Happens During a VPP Onsite Review?" If you are in a state that operates its own OSHA-approved program, check with your state agency to learn specifics regarding its VPP application process.

Where can I get more information?

You can contact your nearest OSHA VPP Manager or Coordinator through OSHA's regional and area offices. If your worksite is under state jurisdiction, contact the office that administers your state program. You can find OSHA regional and area office locations, state contacts, and more about VPP at OSHA's website, www.osha.gov.

Your Regional VPP Manager or Coordinator can refer you to VPP worksites in your area. We encourage you to contact participating sites. They are happy to share their experience.

VPP BENEFITS

Who benefits from VPP?

- The foremost beneficiaries of OSHA’s VPP are the workers who, at day’s end, arrive home safe and healthy to families who need not fear the tragedy of worker death, injury, and 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.

“My site first began researching the VPP in 1994. In 1995, we started pursuing our goal to become an OSHA STAR site seriously, and in 1996 we were awarded MERIT status. That year we broke all of our safety, quality, and production records. We have repeated that every year since then, and I am proud to say we attained STAR status in 1998.”

**Stephen Brown
Union Safety Representative
PACE Local #712
Potlach, Consumer Products Division
Lewiston, ID**

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. VPP has been effective in numerous 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 270 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.

“For those of you who have not yet joined the ranks of VPP, I’d like to take this opportunity to encourage you to do so. Not often do you get a chance like this to forge a new relationship with a regulatory agency based on trust and cooperation. This is a powerful partnership with

all long-lasting results. It's also a tremendous responsibility, yet a smart one, that will pay your business back."

Rich Guimond
Vice-President and Corporate Director
EHS, Risk, and Quality
Motorola
Schaumburg, IL

Why partner with 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 OSHA verifies in comprehensive, periodic onsite reviews of participants. Clearly, participants are pleased with the VPP experience and with the outstanding worker protection they voluntarily achieve year after year.

"I've been involved with this program since making our application in 1996. You can spend all the money you want on the variety of programs available designed to improve EHS performance, and I've looked at them all. For my money, and it isn't that much when compared to the other programs, I believe you get your best bang for the buck with VPP."

Hans Hoefgen, MS, CSHM
EHS Group Coordinator
Moore North America, Inc.
Albany, NY

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.

"Voluntary Protection Programs work for everyone. We at Samaritan Regional Health System are proof of that. All of us at Samaritan are extremely proud of this outstanding achievement. We strive to be leaders in health and safety in the health care community. It is our goal to lead other health care facilities into this worthwhile program through outreach and mentoring programs we have implemented."

VPP works, as evidenced by our lost-workday injury rate in 1999, which was 0.2. As a result, our workers' compensation costs decreased dramatically, adding directly back to the bottom line."

**Connee Cantrill
Director, Environmental Service and Safety
Samaritan Regional Health System
Ashland, OH**

VPP SELF-ASSESSMENT CHECKLIST

The items listed below will help you gauge your eligibility for 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 management system and qualify for VPP.

Call the VPP Manager or Coordinator in your OSHA Regional or Area Office 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 OSHA know you are considering applying. You will find a listing of OSHA offices online at www.osha.gov.

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/or Job Transfer (DART rate).
- **General Industry, Maritime, and Federal Agencies:** Compare your 3-year injury/illness rates with the 3 most recent years of specific industry national averages for nonfatal injuries and illnesses, at the most precise level published for your NAICS code by the Bureau of Labor Statistics (BLS). The website address is www.bls.gov.

OSHA will compare all submitted rates against the most recent single year that would qualify you out of the last 3 published years. 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 your Regional VPP Manager or Coordinator, or review the VPP *Federal Register* Notice of December 24, 2003 (68 FR 68475) for more details.

- **Construction only:** For long-term construction projects applying to the traditional VPP, 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. ***Applicants to the VPP Mobile Workforce Demonstration for Construction should consult the application instructions for the Demonstration.***

- If site rates are at or above the industry average, a construction applicant may qualify for traditional VPP by demonstrating that the company's 3-year nationwide rates for work in the applicant site's NAICS code, or rates for a geographic area approved by 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/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 that ensure effective safety and health protection for all workers at the site.
- At least three ways employees are meaningfully involved in activities and decision-making that impact their safety and health. These must be in addition to your system of hazard reporting.
- 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 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 that cover the entire site at least quarterly (weekly for construction). Conducted by trained staff, with written documentation and hazard correction tracking.
- A written hazard reporting system that enables employees to
 - report their observations or concerns to management without fear of reprisal, and
 - receive timely responses.
- 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 workers do a job 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.

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 THE VPP TEAM COMES ONSITE?

Why does OSHA need to come to my site?

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 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 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 OSHA come?

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

How long will OSHA stay?

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

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 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 Assistant Secretary for OSHA makes the final approval.

What will the team do onsite?

The 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
- 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 OSHA review team may follow the initial meeting.

What is a walkthrough?

The 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 walkthrough. 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 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, if applicable, 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 OSHA rules and regulations, such as lockout/tagout, confined spaces, and respiratory protection.

What happens if the team observes hazards that are apparent violations of OSHA standards?

The walkthrough is not an enforcement process. The 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 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 OSHA Assistant Secretary.

VPP Demonstrations may have different time requirements for hazard correction. Please refer to the appropriate VPP Demonstration guidelines.

Why does OSHA need to talk to employees?

Interviews with management will provide 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 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 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 OSHA team will send its report and recommendation to the Regional Administrator and ultimately to the OSHA Assistant Secretary.

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 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 Assistant Secretary, 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 for approval, what happens next?

The report goes to the Assistant Secretary for Occupational Safety and Health for a final decision. The Assistant Secretary sends a copy of the final report and a decision letter to your manager, or other appropriate company official, announcing OSHA's approval of your site for participation in the VPP. After approval, the Regional VPP Manager or Coordinator will arrange for appropriate recognition for your worksite (for example, a plaque and flag) and will communicate with you about the best time for presentation.

What if I still have questions?

You can contact your nearest OSHA VPP Manager or Coordinator through OSHA's regional and area offices. If your worksite is under state jurisdiction, contact the office that administers your

state program. Find OSHA regional and area office locations, state contacts, and more about VPP at www.osha.gov.

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Expires

Public reporting burden for this collection of information is voluntary and is estimated to average 220 hours per response, including the time for reviewing instruction, 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, N.W., Washington, DC 20210.

VPP APPLICATION INSTRUCTIONS

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 Applicable Contractor¹ Employees

¹ An **Applicable Contractor** has employees working 1,000 or more hours in at least 1 calendar quarter at the applicant's site and is not directly supervised in day-to-day activities by applicant's management. Construction applicants do not break out this category of site employee. If you are a construction applicant, include all contractor employees in the category of Temporary Employees and include them in your TCIR and DART rate.

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

5. Type of Work Performed and Products Produced

Provide a description of the work you perform and the type of products/services you produce. Briefly describe the significant and unique hazards typically associated with your worksite.

6. Applicant's Industrial Classification Codes

Provide what you believe to be your site's 6-digit North American Industry Classification System (NAICS) code and your 4-digit Standard Industrial Classification (SIC) code. Please contact your Regional VPP Manager or Coordinator if you are having difficulty identifying an appropriate code. You can also find NAICS and SIC information on the Bureau of Labor Statistics' website, www.bls.gov. OSHA ultimately will assign you a NAICS code for purposes of VPP.

7. Recordable Nonfatal Injury and Illness Case Incidence Rates

Using information from your OSHA injury and illness logs (OSHA-300), **complete and submit Table 1** in Section G at the end of this application. Then:

- Record your combined **3-year TCIR²** here.
- Record your combined **3-year DART³ rate** here.
- Both your 3-year TCIR and your 3-year DART rate must be below at least 1 of the 3 most recent years of specific industry national averages for nonfatal injuries and illnesses at the most precise level published by the U.S. Department of Labor's Bureau of Labor Statistics (BLS). OSHA will compare all submitted rates against the most recent single year that would qualify the applicant out of the last 3 published years. If, after completing Table 1, you determine that either your 3-year TCIR, DART rate, or both are at or above your industry's average in all 3 comparison years, 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.

² **TCIR** is the **Total Case Incidence Rate** for recordable nonfatal injuries and illnesses.

³ 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 you are a **small business**, you may be eligible for the alternative rate calculation. Contact your Regional VPP Manager or Coordinator, or review the VPP *Federal Register* Notice of December 24, 2003 for more details.
- **Complete Table 2** for rates of Applicable Contractors, listing each contractor individually. You must maintain this information at your worksite and make it available to the OSHA review team during the VPP onsite review. **You do not need to submit Table 2 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 its commitment to meeting and maintaining the requirements of the VPP and taking ultimate responsibility for worker safety and health.

2. Organization

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

3. Authority and Responsibility

Describe what authority you give managers, supervisors, and regular employees regarding safety and health and hazard mitigation.

4. Accountability

Briefly 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, documentation of action items completed, and recommendations for improvement. 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. These must be in addition to employee reporting of hazards. Provide specific information about decision processes in which employees participate, 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 OSHA, and their right to obtain reports of inspections and accident investigations upon request. (Methods may include new employee orientation; intranet or email if all employees have access; bulletin boards; toolbox talks; or group meetings.)

10. Contract Workers' Safety

Describe the process used for selecting contractors to perform jobs at your site. Describe your documented oversight and management system for ensuring that all contract workers who do work at your site enjoy 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 you use 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 you use (when, how, who) 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. 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.

7. 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

Briefly describe the 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 OSHA standards, and procedures for specific operations that require permits, labeling, and documentation. 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 and what PPE the OSHA team members will need to bring to your worksite.

5. Enforcement of Safety and Health Rules

Describe the procedures you use for disciplinary action or reorientation of managers, supervisors, and other employees who break or disregard safety and health rules.

6. Preventive/Predictive Maintenance

Summarize 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.

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, OSHA onsite reviews, process hazard reviews, annual evaluations, or any other means. You will provide effective interim protection, as necessary. Federal applicants also agree to comply with *Title 29 of the Code of Federal Regulations (CFR)*, Part 1960—Basic Program Elements for Federal Employees.

2. Correction of Deficiencies

Within 90 days, you will correct safety and health deficiencies related to compliance with OSHA requirements and identified during any 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. 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 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 the *OSH 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 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 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.
- 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 your designated OSHA Regional VPP 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, maritime, or federal 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 1 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 Self-Evaluation** Submit a copy of the most recent annual safety and health self-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 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 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 Table 1 with your application. You must fill out and maintain a Table 2 for each applicable contractor (see step 9), but you need not submit these tables.**

1. Estimate total hours worked annually by all of your employees for each of the last 3 years. Include temporaries and contract employees directly supervised by your supervisors. 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 non-fatal injuries plus illnesses in a given time frame (either 1 year for an annual rate or 3 years for 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-hours per week, 50 weeks per year.

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

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

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. Compare your 3-year rates with your industry's average rates for the 3 calendar years published most recently by the Bureau of Labor Statistics (BLS). (The BLS publishes rates by NAICS code each year in its Occupational Injuries and Illnesses Bulletin and at its website, www.bls.gov.) To qualify for VPP Star, both of your 3-year rates must be below the **same 1 year** (or more) of the 3 most recent years of specific industry national averages for nonfatal injuries and illnesses, at the most precise level available.

If, after completing Table 1, you determine that your 3-year TCIR, DART rate, or both are at or above your industry's average for the 3 years published most recently, specify your short- and long-term goals for reducing your rates. Within 2 years, both of your rates must be below the industry average for the **same 1 year** (or more) of the 3 years published most recently. Include specific strategies and actions you intend to take to reduce your rates.

9. Fill out and maintain Table 2 for each **Applicable Contractor** at your site. You do not need to submit Table 2 with your application, but you must maintain it at your site so that the OSHA VPP team can review it during your onsite evaluation. 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 number of Injuries Total # of Injuries	Total number of Illnesses	Sum of Injuries and Illnesses	Total Case Incidence Rate for Injuries and Illnesses (TCIR)	Total # of Injuries Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer	Total # of Illnesses Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer	Sum of Injury & Illness Cases Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer	Days Away from Work, Restricted Work Activity, and/or Job Transfer Rate (DART Rate)
3 Years Ago (annual)									
2 Years Ago (annual)									
Last Year (annual)									
3-Year Totals & Rates									
BLS Rates for NAICS code _____						X	X	X	
Year 1 (3 years ago)									
Year 2 (2 years ago)									
Year 3 (last year)									
Percent above or below BLS National Average ⁴						X	X	X	

⁴To compare your rates with the BLS national average rates, select the **most recent single year** for which either
 -- both your 3-year rates are below the BLS rate, or
 -- one of your rates, but not the other, is below the BLS rate, or
 -- both your rates come closest to being below the BLS rate.

**Table 2. Site Applicable Contractor Recordable Nonfatal Injury and Illness Case Incidence Rates⁵
(for work at your site only)**

Name of Contractor									
NAICS Code for work at site									
	A	B	C	D	E	F	G	H	I
Year	Total work hours	Total number of injuries	Total number of illnesses	Sum of injuries and illnesses	Total Case Incidence Rate for Injuries and Illnesses (TCIR)	Total # of Injuries Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer	Total # of Illnesses Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer	Sum of Injury & Illness Cases Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer	Days Away from Work, Restricted Work Activity, and/or Job Transfer Rate (DART Rate)
3 Years Ago (annual)									
2 Years Ago (annual)									
Last Year (annual)									

⁵**You do not have to submit applicable contractor rates with your application**, but you must maintain them at the site for review by the OSHA VPP Team. **Approved participants do submit applicable contractor rate data** each year as part of their annual submission to OSHA.

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