

## Chapter 4

### Visit-Related Requirements

- II. **The Safety and Health Program Assessment Worksheet (Form 33).** OSHA developed the Safety and Health Program Assessment Worksheet Form 33 (the Worksheet) as a tool to be used by all consultants nationwide.
- A. **Definition.** The Safety and Health Program Assessment Worksheet is an evaluation tool to assess the employer's safety and health management system. Further, it can be used to provide information to an employer on the safety and health management system at one establishment and how it compares to other establishments in the same industry. The Worksheet is based on the 1989 Safety and Health Management Guidelines and consists of those elements or attributes used to evaluate a company's safety and health management system. A copy of the Worksheet along with assessment tips is located at Appendix J.
- B. **Worksheet Usage.** The Worksheet must be used by all 21(d) programs. States operating private sector consultation under 23(g) State Plan, may use the Worksheet, once the consultant has taken the training offered by the OSHA Training Institute. The Worksheet is not required for construction sites, but must be utilized when visiting a Construction company.
- C. **Worksheet Training.** Consultants should not attempt to complete the Worksheet and incorporate their findings in the official OSHA data system until they have received formal training on its use and the philosophy behind the attributes. Completion of the Worksheet requires specialized knowledge on how to evaluate the attributes (the safety and health management system elements) and in scoring those attributes. The accumulated data on all Worksheets is collected to establish industry norms, which are used to provide advice to employers and in developing OSHA policies. As a consequence, it is imperative that the data collected on each individual Worksheet is an accurate reflection of the employer's safety and health profile.
- D. **Procedures for Completing the Worksheet.** The Worksheet must be completed using the following criteria:
1. If a SHARP site is being evaluated, or a site is being considered for pre-SHARP status, the Worksheet should be filled out completely.
  2. If a site has requested program assistance, then those portions of the Worksheet which relate to the types of program assistance requested should be completed (i.e., if comprehensive, is requested, the entire Worksheet is completed; if only a specific type of assistance is requested, then only relevant portions of the Worksheet are completed). If no program assistance is requested, BUT the Consultant obtains information which would enable them to fill out a portion of the Worksheet, that portion should be completed. If no program assistance is requested and a Consultant does NOT obtain information necessary to complete a portion of the Worksheet, then that portion of the Worksheet should not be completed.

3. If a construction company is being evaluated the Worksheet should be utilized following the same criteria. If a Construction site is being evaluated, the Worksheet is not required, but can be used as an evaluative tool, following the rules above.

- E. **Worksheet Completion.** Consultants are responsible for completing the Worksheet whenever one is required. This can be done by using the web-based system, or, if the web application is not available, fill out a blank Worksheet until so that the information can be entered into the data system at a later date.

When consultants of different disciplines conduct an initial visit to the same establishment within 90 days of each other, a single Worksheet, representing the mutually agreed upon scores of both consultants, must be sent to the employer. The consultant who completes the first visit will initiate the Worksheet process, but leave the Worksheet in “draft” in the system. The first consultant will indicate in his/her report to the Employer that a Worksheet is pending, but will be submitted by the second consultant. The consultant of the other discipline (“second consultant”) will complete the Worksheet and include it in his/her Written Report.

In the event that there are different scores proposed by each consultant for the same attribute, a mutually agreed upon score will be entered onto the Worksheet, and submitted to the employer.

- F. **Worksheet Comments.** Although completion of the comment section of the Worksheet is optional, it is highly recommended that this section be used. First, to provide a rationale for the score. Second, to provide employers with meaningful recommendations on how to meet or improve on a specific attribute. Third, an employer may be disappointed because he/she has no guidance on which area to prioritize for action first to improve the overall safety and health profile of the establishment.

- G. **Scoring Method.** This scoring method is based on the data collected by the consultant. Only those attributes for which data has been collected during the visits may be scored. A quick summary of the scoring method for the attributes follows:

**Zero** means that no safety or health procedures/policies are even partially present to correct this hazard. (No Activity).

**One** means that some safety or health procedures/policies are present although major improvements are needed. (Little Activity).

**Two** means that considerable safety or health procedures/policies are present with only minor improvements needed. (Most Activity Completed).

**Three** means that no additional safety or health procedures/policies are needed at this time. (No Additional Activity Needed).

In some instances no information is collected or observed on a particular attribute. When this is the case no score is required on the Worksheet and the score remains at the default value of “Not Evaluated” (N/E). Consultants and Consultation Project Managers should be aware that the collection of data impacts national norms for industries and national policy decisions. Therefore, only factually based scores should be recorded entered on the Worksheet and in the IMIS. Consultants are discouraged from “guessing” at the score; it is critical to have primary source documents, interview notes, or observations for all scores. No attribute may be modified or deleted and all attributes must be scored using the method outlined above.

- H. **Attributes to Score.** Although there is no nationwide policy concerning the minimum number of attributes to score on any single visit, States may set more stringent policies. The Consultation Project Manager may direct consultants to complete a specified number of attributes, or identify specific attributes, which must always be scored. Even though we must rely on your professional judgment, as you are our eyes and ears on-site, a high performing Consultation Project will score an average of 8-12 attributes per visit. It is critical that we collect data nationally on all aspects of an employer's safety and health management system; consultants are urged to score the Worksheet using a broad distribution of attributes and they should avoid the repetitive scoring of the same attribute during every visit, unless it is required by the state. Consultants are not limited to one section of the Worksheet; they can score any attribute for which they can find appropriate support (policy, procedure, observation or interview). Finally, we need to view this from the employer's perspective; receiving a Worksheet with 3-6 scored attributes out of 58 attributes can be discouraging and disappointing for the employer and may stifle creativity in the safety and health area.
- I. **Safety and Health Program Assessment.** The Worksheet does not replace the Safety and Health Program Assessment section of the Written Report. This section of the report is used to discuss the employer's overall safety and health system. However, this section of the Written Report should be consistent with the Worksheet using the same seven subdivisions contained in the Worksheet.