This publication does not itself alter or determine compliance responsibilities, which are set forth in OSHA standards themselves and the Occupational Safety and Health Act. Moreover, because interpretations and enforcement policy may change over time, for additional guidance on OSHA compliance requirements, the reader should consult current administrative interpretations and decisions by the Occupational Safety and Health Review Commission and the courts.

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This information will be made available to sensory impaired individuals upon request.

Voice phone: (202) 219-7266; Telecommunications Device for the Deaf (TDD) message referral phone: 1-800-326-2577.
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**Abstract**

We are delighted you are considering applying to the New OSHAs Voluntary Protection Programs (VPP). This booklet and its companion piece, What to Expect During OSHAs Onsite Visit, have been written to assist you. The U.S. Department of Labor, OSHA, created the VPP to recognize and encourage excellence in occupational safety and health protection. Requirements for participation are based on comprehensive management systems with employees actively involved in anticipating, recognizing, evaluating, and controlling the potential safety and health hazards at the site.

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So You Want to Apply to VPP?
Here’s How to Do It!

U.S. Department of Labor
Occupational Safety and Health Administration

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Introduction

We are delighted you are considering applying to the “New OSHA’s” Voluntary Protection Programs (VPP). This booklet and its companion piece, What to Expect During OSHA’s Onsite Visit, have been written to assist you.1

The U.S. Department of Labor, OSHA, created the VPP to recognize and encourage excellence in occupational safety and health protection. Requirements for participation are based on comprehensive management systems with employees actively involved in anticipating, recognizing, evaluating, and controlling the potential safety and health hazards at the site.

You may be considering recognition for OSHA’s premier program—Star—open to companies with comprehensive, successful safety and health programs, who are in the forefront of employee protection. Or you may qualify for Merit, designed for firms with a strong commitment to safety and health that need a stepping stone to achieve Star performance. Or perhaps you have an alternate approach to safety and health that does not meet all the requirements for the VPP, but still protects your employees at the Star level of excellence. Then you would apply to the Demonstration VPP.

In any case, applying for VPP is a major undertaking. Preparation of your application will involve a thorough and detailed review of your worksite safety and health program, first by you and then by OSHA. As you conduct your own review, you may find there are gaps that need to be filled before you file a formal application with OSHA.

During the formal application process, OSHA expects each company to describe its program in detail, addressing the required elements for a strong safety and health management system. This booklet outlines the elements OSHA looks for when identifying model companies that fit the VPP profile. In your application, the more clearly you describe how you have implemented these elements at your worksite, the more quickly and appropriately OSHA can respond to your application.

We are glad you are seriously considering VPP, and we look forward to receiving your application. OSHA’s VPP is a strong component of the “New OSHA’s” commitment to partnership with companies that want to do the right thing—improve worker safety and health.

---

1 OSHA has other materials on VPP, such as an introductory brochure containing application instructions, which you may obtain from your nearest OSHA regional office listed at the end of this booklet or by calling the national office in Washington, DC (202-219-7266).
Companies that wish to apply to OSHA’s VPP must submit a formal application. This guide is for you to use as a workbook in evaluating your current worksite safety and health program. On each page, after a description of the application requirement, there is space for your notes. From these notes, you can develop a comprehensive description of your program that covers all major elements and sub-elements. Most users find that using a team approach to prepare the application works best. If you are taking this approach, you can divide the pages among the team members according to the part of the application each is to complete.

The key elements of an effective safety and health management system—management leadership and employee involvement, worksite analysis, hazard prevention and control, and training—are the focus of this workbook. As you provide the information asked for in the workbook, you will be providing an overview of your company’s safety and health activities. This overview will give you a better understanding of your safety and health system’s existing strengths and weaknesses and will help you in preparing your application for VPP.
General Information

Site/Company Name

Site Address

Site Manager (Name and Title):

Site VPP Contact (Name and Title):

Phone Numbers:

Company/Corporate Name (if different from above)

Corporate VPP Contact (if applicable—name and title):

Address:

Phone Number:

Collective Bargaining Representative(s)

Union Name and number of Local Chapter:

Name of Union Contact:

Union Address:

Union Phone Number:

Number of Employees

Site employees:

Temporary Employees (routinely on the site):

Contract Employees (routinely on the site):

Type of Work Performed and/or Products Produced

Site’s Standard Industrial Code (SIC) - three or four digit number
Injury Rates

- For regular site employees, including temporary employees you supervise, provide the data requested in the following charts for each of the last 3 complete calendar years, plus the average for the 3 years combined.

- For contractors whose employees worked 500 or more hours on your site in any calendar quarter, provide one combined set of data on the charts below reflecting the contractor employee hours worked at your site. (Do not include the hours the contractors employees worked at other sites.)

### Injury Incidence Rates

<table>
<thead>
<tr>
<th>Year</th>
<th>Site Employees</th>
<th>Contract Employees</th>
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<tbody>
<tr>
<td></td>
<td>Hours Worked</td>
<td>Recorded Injuries</td>
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<td></td>
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<tr>
<td>Site 3-year Average²</td>
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<tr>
<td>BLS Industry Average</td>
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### Lost-Workday Case Rates³

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<th>Site Employees</th>
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<tr>
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<td>Recorded Lost &amp; Restricted Workday Injuries</td>
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<td>Site 3-year Average</td>
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<tr>
<td>BLS Industry Average</td>
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¹Injury Incidence Rates (IIR) are calculated (N/EH) x 200,000 where:
N = Number of Recordable Injuries in 1 year.
EH = Total Number of Hours Worked by all employees in 1 year.
200,000 = Equivalent to 100 full-time workers working 40 hour weeks 50 weeks per year.
²Three-year averages are calculated by totalling the hours worked (EH) and the number of injuries (N) and using these total numbers in the formula.
³Includes restricted and lost workday injuries.
⁴Calculations are the same as for the IIR except that N = the number of lost and restricted cases.
Commitment

- Describe your approach to managing the development of your site’s safety and health policy.

- Describe your system for communicating this policy to all your employees.

- Describe your system for setting safety and health goals and objectives.

- Describe how these goals and objectives are communicated to all employees.

- Describe how top management is visibly involved in the safety and health program.

- Attach a copy of the site’s safety and health policy.

- Attach the current year’s safety and health goals and objectives.
Organization
• Describe how the site safety and health functions fit into your overall management organization.

• Attach an overall organizational chart explaining the relationship of your site’s safety and health personnel to your overall organization.

• For large sites, include a separate organizational chart for the safety and health functions.

Responsibility
• Describe the assignment of line and staff safety and health responsibility.

• Attach previously established written material, such as sample job descriptions for managers that include safety and health elements.

Accountability
• Describe the system used for holding line managers and supervisors accountable for safety and health and how that system is documented.

• Attach blank performance appraisal forms for managers and supervisors. (Managers must be evaluated on safety and health performance.)

• Indicate how employees are held accountable for safe and healthful actions.
Resources

- Provide a narrative summary of personnel, equipment, budget, capital investments (if any), and other resources devoted to your worksite’s safety and health management system.

Planning

- Describe how safety and health are a part of your overall management planning, such as setting production goals, increasing or decreasing the workforce, or introducing a new line.

Program Evaluation

All applicants must perform an annual evaluation of the elements required for VPP participation. This evaluation is not the same as a safety audit. It is a review and assessment of the effectiveness of all the program elements: management leadership, employee involvement, worksite analyses, hazard prevention and control, and training

- Describe how you perform the evaluation. For example, who evaluates the program, at what time of year, how is the evaluation report distributed, and how people are held accountable to ensure the recommendations from the evaluation are accomplished?
• Describe how the recommendations from the annual program evaluation are integrated into the safety and health objectives for the next year.

• Attach a copy of the most recent annual evaluation of your entire safety and health program.

• If either the site’s or applicable contractor’s injury incidence rates and/or the lost-workday case rates are above the national average for the appropriate most recently published SIC, include both long-term and short-term strategies for reducing these rates.

‘Applicable contractors are those who have worked on the site 500 or more hours in any one quarter of the calendar year.'
**Contract Workers**

- Describe how contractors’ past performance in safety and health is taken into account in the bidding process.

- Describe oversight, coordination, and enforcement methods used to ensure that the contractor safety and health program is adequate and is implemented properly. Specify site entry and exit procedures for contractors.

- Describe the means used to ensure prompt correction and/or control of hazards, however detected, under a contractor’s control.

- Describe the methods used to ensure that all injuries and illnesses occurring during work performed under a contract are recorded and submitted to you.

- Describe methods, such as monetary penalties and dismissal from the site, used to discourage willful or repeated noncompliance by contractors or their employees.
• List the number of resident contractor companies and the approximate number of contract employees on the site at the time of the application or during the most recent calendar year, whichever most accurately reflects the usual situation at the site.

Employee Notification
• Describe the methods used to ensure that all employees, including newly hired employees, are aware of the following:
  - The site’s participation in VPP,
  - An employee’s right to file a complaint with OSHA, and
  - An employee’s right to receive the results of self-inspections and accident investigations, upon request.
Degree and Manner of Involvement

- Describe how you involve your employees in your safety and health program.

- Provide specific information about employee involvement in decisionmaking, such as problem resolution, hazard analyses, accident investigations, safety and health training, or evaluation of the safety and health program.

Safety and Health Committees

Commitees are not required, but if there is a committee, please provide the following information:

- Give the date the committee was formed. ________________________________

- Describe method of selecting employee members and length of service requirements.

- Describe committee meeting requirements, such as frequency, quorum rules, and whether or not minutes are kept.
• Describe the committee’s role in the site’s safety and health program, such as:
  - Frequency and scope of committee inspections,
  - Role in accident investigations, and
  - Role in hazard notification.

• Describe hazard recognition training or other specific training for committee members.
Pre-Use/Pre-Startup Analyses

- Explain how new or significantly modified equipment, materials, processes, and facilities are analyzed for potential hazards prior to purchase and use.

- Attach documentation such as project design evaluations, preliminary hazard analyses, process hazard analyses, fault tree analyses, or management of change forms.

Comprehensive Surveys

- Describe the methods used for initial determination of safety and health hazards. Methods may include baseline industrial hygiene surveys, comprehensive safety surveys, radiological surveys/exposure mapping, and/or project safety reviews at the time of design.

- Provide evidence that the surveyors were qualified to perform the work.

Self Inspections

As a VPP applicant in general industry, you must complete monthly inspections in some areas of the site; the entire site must be inspected quarterly.

For the construction industry, management must inspect the entire site weekly, and the joint safety and health committee, or its equivalent must inspect the entire site at least monthly.

- Describe the system used to conduct routine, general worksite safety and health inspections. Include schedules and types of inspections, the qualifications of those conducting the inspections, and how corrections are tracked to completion.
• Describe the system for inspecting the entire site quarterly. (For construction, describe the system for inspecting the entire site weekly.)

Routine Hazard Analyses
• State how you review jobs, processes, and/or the interaction among activities to determine safe work procedures at your worksite. Routine procedures, such as job hazard analysis, job safety analysis, and process hazard analysis that result in improved work practices may be used. Describe the frequency of these analyses and provide supporting documentation.

• Describe phase hazard analyses (construction applicants only).

• Describe how results from analyses, such as job hazard analyses, are used in training employees to do their jobs safely and in planning and implementing the hazards correction and control program.

• If process hazards analyses are being conducted, describe how you decide which processes to analyze first.
Employee Reports of Hazards

- Describe how employees notify management when they observe conditions or practices that may pose safety and health hazards. The reporting system must include protection from reprisal, timely and adequate response, and correction of identified hazards.

- Describe how “imminent danger” situations are reported by employees and handled by management.

- Describe how corrections are tracked to completion.

Accident Investigations

- Describe the system used to conduct accident and incident investigations.
• Describe training and/or guidance given to investigators; provide criteria used for deciding which accidents/incidents will be investigated; and describe how near-miss incidents are handled.

• Describe the “lessons learned” process being used at the site and demonstrate root cause analyses.

• Describe the method of tracking recommendations and corrections to completion.

Trend Analyses
• Describe the system(s) used to conduct trend analyses of all data generated by the safety and health program, including employee reports of hazards, hazard assessment data, and injury and illness experience data.

• Describe how the results of the trend analyses are disseminated and used by the line organizations.
Professional Expertise

• Provide details concerning the use of certified professionals, such as occupational medicine personnel, industrial hygienists, and safety professionals in identifying, preventing, and controlling recognized hazards.

• Describe what services are available near or at the site; how these professionals integrate their services with each other; and how communication is maintained.

Safety and Health Rules

• Attach a copy of your site’s safety and health rules and describe the disciplinary system used to enforce those rules. Demonstrate that the rules apply to and are communicated to all employees.

• Describe any positive reinforcement system you may use.

Personal Protective Equipment

• Describe the requirements for selecting, using, maintaining, and distributing personal protective equipment.
• If respirators are used, attach or list the components or elements of your respiratory protection program—e.g., table of contents of written program. The entire program will be reviewed during the onsite visit.

Preventive Maintenance
• Summarize and briefly describe the procedures you use for preventive maintenance of equipment. Include information on scheduling, and describe how the maintenance timetable is followed.

Emergency Preparedness
• Describe the company’s emergency planning and preparedness program. Include information on emergency and annual evacuation drills.

• Describe how credible scenarios are chosen for emergency drills and their relationship to site specific hazards.
**Medical Programs**

- Describe how you integrate the medical program with the safety and health program.

- Describe the availability of both onsite and offsite medical services or physicians. Indicate the coverage provided by employees trained in first aid, CPR, and other paramedical skills, and indicate what type of training these employees have received. Address coverage for all work shifts.

- Describe how occupational health professionals are involved in routine hazard analyses, in recognizing and treating injuries and illnesses early on, in limiting severity of harm, and in managing injury and illness cases.

**Specific Occupational Safety and Health Programs**

- List the written occupational safety and health programs implemented at your site, such as a respiratory protection program, where applicable, bloodborne pathogen program, hazard communication program, process safety management program, and lockout/tagout program. (Do not include these programs in your application. They will be reviewed during the onsite visit.)
Employees

- Describe formal and informal safety and health training programs for employees. Specifically address how employees are taught to recognize hazards related to their jobs.

- Describe how often and in what way courses are evaluated and updated.

- Describe testing you use to ensure that employees understand and retain course information.

- Describe how and where training records are kept.

- Describe how frequently training is performed and what prompts repeat training.
Supervisors
• Describe formal and informal safety and health training for supervisors.

Managers
• Describe how top-level managers are trained in their safety and health responsibilities.
OSHA Regional Offices

Region I
(CT,* MA, ME, NH, RI, VT*)
JFK Federal Building
Room E-430
Boston, MA 02203
Telephone: (617) 565-9860

Region II
(NJ, NY,* PR,* VI*)
201 Varick Street
Room 670
New York, NY 10014
Telephone: (212) 337-2378

Region III
(DC, DE, MD,* PA, VA,* WV)
Gateway Building, Suite 2100
3535 Market Street
Philadelphia, PA 19104
Telephone: (215) 596-1201

Region IV
(AL, FL, GA, KY,* MS, NC, SC,* TN*)
Atlanta Federal Center
61 Forsyth Street, SW,
Room 6T50
Atlanta, GA 30303
Telephone: (404) 562-2300

Region V
(IL, IN,* MI,* MN,* OH, WI)
230 South Dearborn Street
Room 3244
Chicago, IL 60604
Telephone: (312) 353-2220

Region VI
(AR, LA, NM,* OK, TX)
525 Griffin Street
Room 602
Dallas, TX 75202
Telephone: (214) 767-4731

Region VII
(IA,* KS, MO, NE)
City Center Square
1100 Main Street, Suite 800
Kansas City, MO 64105
Telephone: (816) 426-5861

Region VIII
(CO, MT, ND, SD, UT,* WY*)
1999 Broadway, Suite 1690
Denver, CO 80202-5716
Telephone: (303) 844-1600

Region IX
(American Samoa, AZ,* CA,* Guam, HI,* NV,* Trust
Territories of the Pacific)
71 Stevenson Street
Room 420
San Francisco, CA 94105
Telephone: (415) 975-4310

Region X
(AK,* ID, OR,* WA*)
1111 Third Avenue
Suite 715
Seattle, WA 98101-3212
Telephone: (206) 553-5930

*These states and territories operate their own OSHA-approved job safety and health programs (Connecticut and New York plans cover public employees only). States with approved programs must have a standard that is identical to, or at least as effective as, the federal standard.