A Readiness Assessment of Company XYZ to Implement OSHA's Voluntary Protection Program

by

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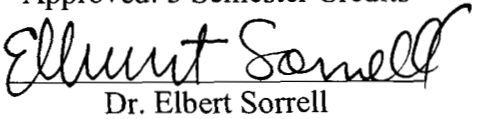

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ABSTRACT

The primary objective of this study was to assess the readiness of the XYZ company to qualify for Voluntary Protection Program (VPP) status. The review of literature included overview of Management systems, general information of a Health and Safety Management Systems and a discussion of various safety management systems including International Safety Rating System (ISRS), Proctor and Gamble, OHSAS 18001, ANSI Z10.200, the National Safety Council and the overview of OSHA's VPP. An interview guide and the self-assessment form were used as instruments to collect data. The findings resulting from the interview questions and the self-assessment form suggest that the company is not prepared to be a VPP worksite. Deficiencies of the company were addressed. Finally, the study provides some conclusions and recommendations regarding the weaknesses of the company and how the organization can correct and improve those identified deficiencies and achieve VPP status.

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Chapter I: Introduction

In business and industry today, many specific management systems and tools exist. Management system refers to the organization's structure for managing its processes or activities that transform input of resources into a product or service which meet the organization's objectives, such as satisfying the customer's quality requirements, complying with regulations, or meeting environmental objectives (International Organization for Standardization [ISO], 2005). Management systems are used to ensure the company's commitment to the customer, environment and safety.

ISO has various types of management systems. ISO 9000 is an international standard establishes the qualifications of global quality assurance and quality control for a company. The benefits of this management system are to increase customer confidence, assure that the products will meet customer expectations, and to reduce costs from scrapping and reworking products. ISO 14001 has been created and issued by ISO. It is another model of specific management system relating to environmental management system. The benefits of implementing ISO 14001 system are to assure customers of the company's commitment to demonstrate environmental management, to obtain insurance at a reasonable cost, to maintain good public and community relations, and to reduce incidents that may result in liability (The Pan American Center for Sanitary Engineering and Environmental Sciences [CEPIS], 1998). Whereas the ISO management systems concern quality and environment, Occupational Health and Safety Assessment Series (OHSAS) concerns safety and heath. The OHSAS 18000 is a specific management systems relating to occupational health and safety (OH&S). The main benefits of this program are to eliminate or minimize an organization's OH&S risks and continuously

improve an existing safety and health management system and its performances (OHSAS, 2004).

Once the subject of worksite safety is mentioned, questions arise concerning whether there are any specific management systems that the company can voluntarily commit to, in order to assure that every employee has a safe and healthy working environment. One viable management system is Voluntary Protection Program (VPP), a safety management system that was developed by the Occupational Safety and Health Administration (OSHA). It is a premier recognition program which is in the process of being implemented across the country by companies striving to go above and beyond the regulatory requirements. VPP was designed as a cooperative compliance program intended to unite private industry and OSHA under a shared vision of employee protection. The program emphasizes recognizing and promoting an effective safety and health management system and providing a company with mechanisms for achieving desired performance. The significant benefits from this program are minimizing injuries and illnesses, reducing workers' compensation premiums and costs associated with employee replacement (OSHA, 2000). Worksites qualifying for VPP attain Star, Merit and Demonstration status. Star worksites meet all VPP requirements. Merit participants have demonstrated the potential and willingness to achieve Star status, but some aspects of their programs need improvement. Lastly, Demonstration participants test alternative ways to reach safety and health excellence that may lead to changes in VPP criteria (OSHA, 2000)

Statement of the Problem

Company XYZ expressed interest in achieving VPP status, but their readiness is questionable. This study will assess the readiness for the company to determine their ability to qualify for VPP status.

Purpose of the Study

The purpose of this study was to assess the readiness of Company XYZ company to qualify for VPP status.

Objectives of the Study

The objectives of this study are:

1) To identify and define VPP status

2) To determine eligibility status by comparison of injury statistics against the Bureau of Labor Statistics

3) To compare VPP requirements with the company profile

4) To identify the deficiencies or weaknesses and suggest solutions

Significance of Study

This paper addresses the readiness of Company XYZ to meet OSHA's Voluntary Protection Program. The result of this study could provide improvement opportunities to Company XYZ's current risk management plans, and demonstrate the readiness for becoming VPP certified.

Definitions

The following definitions and terms are included for clarification and understanding:

Occupational Safety and Health Administration (OSHA). "OSHA is located in the U.S. Department of Labor and is responsible for developing and enforcing

workplace safety and health regulations" (National Institute for Occupational Safety and Health [NIOSH], 2003, para. 2)

International Organization for Standardization (ISO). "ISO is a network of the national standards institutes of 148 countries, on the basis of one member per country, with a Central Secretariat in Geneva, Switzerland, that coordinates the system" (ISO, 2005, para. 1).

ISO 9000. ISO 9000 is an international standard published by ISO. Its family is primarily concerned with quality management. The organization establishes and adopts standards to fulfill the customer's quality requirements and applicable regulatory requirements. The standard also aims to enhance customer satisfaction and achieve continual improvement of its performance in pursuit of these objectives (ISO, 2004).

ISO 14000. The ISO 14000 family is primarily concerned with environmental management. The organization establishes and adopts standards to minimize harmful effects on the environment caused by its activities, and to achieve continual improvement of its environmental performance (ISO, 2004).

OHSAS 18000. OHSAS 18000 is an international occupational health and safety management system specification. It comprises two parts, 18001 and 18002. It was created via a concerted effort from a number of the world's leading national standards bodies, certification bodies, and specialist consultancies (OHSAS, 2004).

Voluntary Protection Program (VPP). VPP is an OSHA premier program created in 1982 to recognize and partner with worksites that implement exemplary systems to manage worker safety and health. Sites qualifying for VPP attain Star, Merit or Demonstration status (OSHA, 2000).

Limitations of the Study

The study pertains solely to Company XYZ. The results can not be generalized.

Chapter II: Literature Review

The purpose of this study was to assess the readiness of Company XYZ to qualify for VPP status. This chapter is devoted to the review of literature which includes an overview of management systems, general information about health and safety management systems, and a discussion of various safety management systems including the International Safety Rating System, Proctor and Gamble, OHSAS 18001, American National Standards Institute (ANSI) Z10.200 (draft standard), the National Safety Council, and an overview of OSHA's VPP.

Management Systems

In the 21st Century, operating organizations face many challenges including profitability, technology, competitiveness, growth, globalization, adaptability and speed of change. All of these challenges are significant. Progressive organizations will implement management system to deal with these challenges (British Standard Institution [BSI], 1999).

A management system is an organized set of components that enable an organization to accomplish set goals. A specific goal set for the system may be to facilitate the flow of information, to improve quality, to minimize losses from accidents and injuries, or to reduce environmental impacts (Pascal, 1997).

In the general management perspective, the classical functions of management are as following:

- Planning- is determining and setting goals and objectives of an organization and also establishing a method to achieve them

- Controlling- is the monitoring progress toward goal accomplishment as well as finding and taking corrective actions when the progress is not being performed.
- Organizing- is determining where the decision will be made, identifying who will do what jobs and assigning who will work for whom in the organization.
- Leading- is inspiring and motivating employees to perform their work to achieve organizational goals (Williams, 2005).

There is also the cycle of Plan-Do-Check-Act, a four-step process for quality improvement (ASQ, n. d.) that is known and used widely in the management systems. The Plan-Do-Check-Act model has been adopted across many domains and provides a background structure upon the management systems can be integrated (Dewit, 2004). This cycle is used for the focus of continuous improvement efforts.

- Plan – Identify the problem to be analyzed, clearly define the problem, establish a problem statement, and come up with the problem solving ideas.
- Do - Select the solution, and implement the chosen solution
- Check – Evaluate the results after implementing the solution by gathering and analyzing the data from the solution.
- Act – Standardize the solution, adopt solution, plan on monitoring the solution, and continue to seek for the improvement to refine the solution (Six Sigma, 2002).

The benefits associated with implementation of management system include assisting organizations to achieve continuous improvement in the areas of business performance and risk management, and facilitating organizations to continually renew its mission, strategies, operation and service levels (BSI, n. d.). In addition, implementing

management system can assist an organization in improving internal efficiency, improving quality and increasing customer and employee satisfaction (QPR, 2005).

Health and Safety Management System

Health and Safety Management System is an integrated set of plans, actions and procedures implemented in an organization by an employer in order to minimize the incidence of injury and illness to workers involved in the operations (Government of Alberta, 2002). It is used to systematically manage health and safety issues within an organization. It can be thought of as a specific form of management system that focuses on health and safety issues (Roig & Ruble, 2003). The main purpose of the health and safety management system is to reduce the possibility of accident, illness, injury or fatality as well as to ensure that all the potential hazards in workplace are eliminated or controlled in a systematic manner (Northern Territory Government, n. d.). Organizations implement health and safety management system by identifying, assessing and controlling risks to workers in workplace. The scope of a health and safety management system will vary depending upon the type of workplace and the job characters held in an organization (Government of Alberta, 2005).

Safety management system is defined by a Canadian Aviation Maintenance Council (CAMC) as an integrated set of work practice, beliefs, and procedures for monitoring, supporting, and improving the quality of safety performance in an organization (CAMC, 2004).

Safety management system components are considered to be important and form the basis of the system to be effective. An organization should manage its health and safety issues in the following manners: (Roig & Ruble, 2003, p. 1-2)

- Setting health and safety policy - Define health and safety policy, clearly stating what the organization desires to accomplish and set the health and safety commitment.
- Planning to ensure success of the management system – Provide the framework for establishing health and safety goals and objectives of the organization.
- Implementing practices, programs and procedures related to health and safety issues – Provide the structure such as practices, processes and procedures and delineate the roles, responsibilities, authority and accountability for achieving the work.
- Monitoring and measuring to evaluate health and safety performance – Provide a mechanism to track performance and evaluate progress to meet the established objectives.
- Checking for and correcting identified problems – This action keeps an organization on track relative to its goals and objectives.
- Reviewing the entire system at a top management level periodically – This action assists an organization to ensure that the system continues to reflect and accomplish company goals over the long term.

In order to be effective the health and safety management system should be well planned managed and documented. The system is planned and managed based on the four functions of general management addressed above: planning, controlling, organizing and leading.

Primary benefits of implementing a health and safety management system are the following (Northern Territory Government, n. d.):

- Enable an employer to meet the moral and legal responsibilities
- Assist the organization in prevention of injury and disease resulting from occupational work
- Reduce loss of working days due to injury and accidents
- Decrease incidence of employees' compensation claims
- Minimize work strikes due to safety dispute
- Improve work system and worker morale thus leading to improving productivity

Discussion of Various Safety Management Systems

International Safety Rating System (ISRS). ISRS is a modern safety program evaluation system. It provides the ways of analysis for each element of the safety program. This system is used for auditing the measure of loss control effectiveness of an organization safety activity by independently auditing the level of safety applied to the following 20 elements (International Loss Control Institution, 1988):

- Leadership and administration – effective leadership and program administration are essential components in order to the success of safety and health program in an organization. All management levels must be involved in the program.
- Management training –provides the essential knowledge and skills for managing the safety and health/ loss control program and ways to motivate employees to use it. Each manager should be provided by management training for the safety knowledge in order to each manager to be effective at his level.
- Planned inspections – are basic elements in the safety and health/ loss control program. They involve the systematic assessments of the facilities' equipments, tools, material and the usage of them by employees. They are a source of

feedback information for management on the effectiveness of purchasing, engineering, methods and procedures, communications and other aspects of the safety program.

- Task analysis and procedures - is the methodical examination of a task to identify all potential exposure that may occur while the task is being performed. Task analysis could be conducted and performed through observations and discussions in the work environment.
- Accident/incident investigation – involves the systematic examination of an undesired event that did occur and result in injury to people or damage to property (ISRS, 1988). An accident/incident investigation also assists in preventing the repeats of the same type of accident or incident to happen (Keller, 2005)
- Task observation – is a technique to enable a manager to ensure that tasks are performed efficiently and comply with standards. By conducting this practice, it can verify or identify deficiencies in employee training, task procedures, equipment adequacy and use of appropriate materials.
- Emergency preparedness – evaluates a program in an organization to standards recognized in effective.
- Organizational rules – serves as a guidelines to employee behavior on an activity that is frequently a very critical risk. It helps in minimizing the critical activities that could result in accidental loss.
- Accident/incident analysis – involves the systematic analysis of the root causes and actual consequences of an accident/incident.

- Employee training – evaluate training programs conducted and performed in an organization to provide knowledge and skill to employees to complete the job properly and meet safety and quality standards.
- Personal protective equipment – evaluates the personal protective equipment programs in the company to ensure that the selection, fitting, use and maintenance of PPE are managed appropriately.
- Health control – evaluates efforts that the company puts in order to protect employees from injuries and illnesses that could result from exposure to hazardous condition in workplace.
- Program evaluation system – this element measures the safety management programs, workplace compliance with appropriate standards, codes and regulations.
- Engineering controls- These controls can identify and eliminate hazards before they create situations for loss. They are important for an effective pre-contact method of accident and incident control.
- Personal communications – this element evaluates the communication program which encourage individual in the company to exchange information to people within the company to share knowledge in particular subjects or skill.
- Group meeting – this element measures the program to ensure that the group meeting is used as a means to boost or update the knowledge of employees regarding to safety.
- General promotion - This element focuses on programs intended for changing employee attitudes. The programs may include those activities performed to

reinforce safety and health knowledge through employee incentives, displays, special events and publications.

- Hiring and placement – this element measures the hiring and placement program to ensure that the program effectively assists the company hire the capable people to work safely in specific job.
- Purchasing controls – this element is designed to ensure that loss related to purchasing are controlled prior to products and services being delivered on site by evaluating the formal programs and procedures which are in place and working in an organization.
- Off-the-job safety – this element is designed to focus on identifying the types of off-the-job accidents employees, and sometimes their family members, may have and may impact their job performance.

The ISRS system is devised for the main purpose as an audit tool (International Loss Control Institution, 1988). It is widely used as a tool not only for auditing by qualified corporate-level personnel or qualified personnel unit level, but it is also used by qualified external auditors. Three following methods below are the major methods of performing an audit and checking the actual existence and effectiveness of the program activities:

- Record checks.
- Onsite-interviews with all levels of employees.
- Physical condition sampling.

According to the article written by Top in 1991 the ISRS standard can be used within smaller companies as well as large companies. It can also be used within organizations with a new safety program as well as in those with a more evolved

program. This management system encourages management commitment and employee involvement in safety to reduce accidents and risks according to the methods of the auditing addressed previously. This standard is an important tool in safety improvement and it also promotes risk and safety awareness in an organization.

Proctor and Gamble Key Elements. This health and safety management system was developed and implemented by Proctor and Gamble Company. Overall, the system was designed to emphasize continuous improvement in accomplishing preferred health and safety results. This approach is based on the following key elements (Fulwiler, 1993):

- Organizational Planning and Support
  A. Clear Expectations – refers to establishing a comprehensible expectations
  B. Management and employee involvement – refers to the set expectations are shared to everyone in an organization and all employees are involved in the safety process.
  C. Goal setting and action planning – refers to having system planned for a continuous improvement.
- Standards and Practices
  A. Standard implementation- is an effective implementation of a safety and health standards based on company experience and regulatory and voluntary consensus standards.
  B. Safe practices - are the written site and general departmental safe behavior expectations.

C. Planning for safe conditions – covers system to engineer, design, purchase, inspect, and maintain the physical work environment.

- Training
  - A. Site training systems – is a system that ensures that all employees are empowered to perform and achieve their safety and health expectations.
  - B. Qualification of health and safety resources -
- Accountability and Performance Feedback
  - A. Behavior observation sampling/safety sampling – is a system that measures behaviors within the system before they result in injury or illness.
  - B. Behavior feedback – refers to the system to provide individual feedback and to maintain accountability for performance.
  - C. Performance tracking – refers to the visible measures of system capabilities and performance.

Key elements are rated in a numerical rating from 0 to 10 by either internal (self) or external (staff) reviews. The numerical rating describes the quality of the programs that are already implemented in the worksite. Each key element obtains rates from 0 to 10; 10 represents the most effective quality of the site whereas 0 represents the least effective of the site. This system is based on the Plan-Do-Check-Act cycle (Fulwiler, 1993). All level employees make recommendations with the goal of a continuous improved system.

OHSAS 18001. OHSAS 18001 is the specific management system for managing health and safety responsibilities of an organization. The steps of OHSAS 18001 are as follows (BSI, 1999):

- OH&S policy – OH&S policy authorized by top management should be written up. The policy should clearly states overall health and safety objectives and a commitment to improving health and safety performance in an organization.
- Planning –essential components of planning process are the ongoing identification of hazard, the assessment of risks, the implementation of control measures, planning for legal and other requirements, objectives and OH&S management programs.
- Implementation and operation – this process is comprised of managing the structure of the OH&S management system and authorizing the roles and responsibilities. It is also included training awareness and competence, consultation and communication, documentation, document and data control, as well as emergency preparedness and response.
- Checking and corrective action – this process covers performance measurement and monitoring, accident incidents and corrective and preventive action, records and records management, as well as audit.
- Management review - OH&S management system should be reviewed by top management of an organization in order to ensure its continuing suitability, sufficiency and effectiveness.

OHSAS 18001 specifically focus on the requirements for the occupational health and safety system to enable organizations to control risks and to improve their performance (BSI, n. d.).

Similar to others, the OHSAS 18001 standard focuses on prevention and reduction of the occurrence of injuries and disease in the workplace (BSI, n. d.). It is also

based on the commitment of an organization to the continual improvement of its business performance. The design of OHSAS 18001 is also based on the Plan-Do-Check-Act cycle. According to the British Standards (BSI, n. d), this standard is designed to be compatible with other management systems standards and specifications such as Quality Management Systems and Environmental Management Systems. This facilitates the integration of quality, environmental, and Occupational Health and Safety Management Systems.

ANSI Z10.200 (Draft). The standard is a draft created by the American National Standards Institute. It is being developed to help organizations improve safety and health performance, and it also can help in minimizing workplace risks and reduce the cost of occupational fatalities, injuries and illnesses. The standard provides an effective tool for continuous improvement to the organization and systematically eliminates root causes of deficiencies.

This standard consists of these following activities in order to achieve the continual improvement:

- Management Leadership and Employee Participation – It defines the requirements for management leadership and employee involvement. It is very necessary for top management and effective employees to participate in Occupational Health and Safety Management System (OHSMS) in order for it to be successful.
- Planning – this process is designed for the purpose of identifying and prioritizing OH&S related issues in an organization. This allows an organization to implement plans to achieve the set objectives.

- Implementation of OHSMS – this defines the elements that are required for implementing OHSMS. These elements will support an organization to have an effective OHSMS to pursue the objectives from planning process.
- Evaluation and Corrective Action – defined the requirements to perform the measurement and monitoring activity which the results of those activities can be used to determine whether the system is functioning as designed. The result can also be used to require that deficiencies are corrected and new opportunities for improvement are identified.
- Management Review – this process is considered a critical part of the continual improvement of the OHSMS. The purpose of this process is for the top management to review and recommend improvements to OHSMS.

The ANSI Z10 standard was created by a committee that was formed of broadly representative members from industry, labor, government, professional organizations and general interest participants (American Industrial Hygiene Association [AIHA], 2004). The committee examined and adapted the principles relating to occupational, environmental and quality standards, guidelines and practices to make this standard similar with the international standards, and other management system approaches that currently are used. Consistent with other health and safety management systems, this standard was developed and expected to encourage the organizations to use the principles to manage their occupational health and safety issues. The ANSI Z10 draft standard also focuses on the continual improvement of safety in an organization. It was developed based on many recognized management systems such as ISO 9000 and ISO 14000 which promotes integration with other systems.

National Safety Council. A safety management system created by National Safety Council provides both large and small organizations the structure to implement a comprehensive safety management program (National Safety Council, 2002). This system is uniquely designed to provide equal consideration of elements of administration, operation and culture to achieve and maintain safety performance. This system applies a continuous improvement process that commences with management leadership and commitment which results in safety and becomes an essential principal of the management in an organization. The system also assists an organization to ensure that it is capable to achieve and maintain high standards of safety performance by support safety actions along with business objectives. Key elements of this system are as follows:

- Management Leadership and Commitment. Executive management must make the commitment to safety.
- Organizational Communications and System Documentation. A high level of communication assists an organization of an effective safety management system.
- Assessments, Audits, and Continuous Improvement. In order for the safety management to be effective, all assessments, audits and continuous improvements should be reported, documented and action taken by management in an importantly and timely manner.
- Hazard Recognition, Evaluation, and Control. They are very vital to an effective safety management system.
- Workplace Design and Engineering. Safety, health and environmental hazards are most effectively dealt with the workplace planning and design stage. By involvement of safety professionals in companion with management and others in

facility planning, work process design, material and equipment hazard recognition.

- Operational Safety Programs. An effective safety management program must focus on managing risk to worker's safety along with regulatory compliance matters.
- Employee Involvement. It benefits both employees and management regarding to performance improvements and increased recognition and support of policies.
- Motivation, Behavior, and Attitudes. In order to support organizational goals and objectives, motivation is used to give employee the awareness, interest, and willingness to increase company safety effort.
- Training and Orientation. In order to assure that a methodical and approved process including needs analysis, course design and development of an evaluation strategy is practiced in a consistent manner; safety training should be planned and implemented.

Voluntary Protection Program (VPP)

VPP is a program created by OSHA in 1982 to recognize and partner with worksites that implement exemplary systems to manage the health and safety of employees (Keller, 2005). VPP is also defined by J. J. Keller as a comprehensive safety and health program adopted by OSHA in 1982. It is a program that companies implement to create a safe and healthy workplace environment for employees (Keller, 2005). Roig and Ruble describe VPP as a program originally developed by OSHA to identify worksites that have exemplary systems to manage employee safety and health,

meaning that these worksites have comprehensive programs that go beyond compliance with the specific regulatory requirements listed by OSHA (2000).

Purpose of VPP. The purpose of VPP is to emphasize the importance of, encourage the improvement of, and recognize excellence of employer-provided, employee-participative, and generally site-specific occupational safety and health programs (OSHA, 2000). Furthermore, the purpose of VPP is to form a partnership between employees, OSHA and company management to provide and ensure the safe work environment for employees.

Elements of VPP. VPP sites must show safety excellence, improvement and exceed OSHA standards. Moreover, for the VPP applicants to qualify for VPP, they must operate comprehensive safety and health management systems that incorporate the four following key elements:

- Management Leadership and Employee Involvement

  The top management of an organization must take the leadership and commit to the effective protection of occupational hazards in the workplace (OSHA, 1989). The highest level management must establish and review the health and safety policy. Also, management must ensure that all employees know, understand, and support the policy. Management must provide the motivation and resources for organizing and controlling activities within an organization meaning that for the employee involvement, it provides the method through which employees can develop and express their own commitment to safety and health (OSHA, 1989). Management needs to ensure that there are several ways for employees to be involved in making decisions and solving problems regarding safety and health.

- Worksite Analysis

  Worksite analysis involves a variety of worksite examinations to identify the existing hazards, conditions and operations that may create hazards in the workplace. Worksite analysis methods will assist an organization to actively analyze work and the workplace to anticipate and prevent harmful occurrences. (OSHA, n. d.)

- Hazard Prevention and Control

  Hazard prevention and control is the process used after workplace hazards and potential hazards have been identified. After hazards are detected, all current and potential hazards must be prevented, corrected or controlled. (OSHA, n. d.)

- Safety and Health Training

  Establishing training programs can assist an organization to ensure that senior management, line management and employees know and understand established policies, rules and procedures in order to prevent exposure to workplace hazards (OSHA, n. d.).

Critique VPP with other management systems. VPP and OHSAS 18001 are both voluntary standards. Like OHSAS 18001, VPP is a program where specifics are identified and measured by an individual organization. However, there are some slight differences between these two programs. VPP is more performance-based, and more systematic. In VPP, there are minimal performance stages that need to be met. In order to be certified as VPP worksite, the applicant site must comply with OSHA regulations and meet the certain historical injury/illness rates. Moreover, in VPP, management, labor and OSHA work together to establish cooperative relationships in workplaces. OHSAS 18001

does not establish absolute requirements for performance. It is designed for organizations that wish to have a standard against which to evaluate their heath and safety management system. Even though there are some differences on how both standards were developed and applied, both focus on similar activities (Environmental and Occupational Risk Management [EORM], 2005)

VPP Status. OSHA approves successful applicants as one of three statuses: Star, Merit or Demonstration participants.

- Star status is designed for excellent worksites that have implemented comprehensive, effective safety and heath management systems and accomplished injury/illness rates below their industry's national average (OSHA, n. d.). It is the most selective program in VPP (Keller, 2005).
- Merit status is designed for worksites with the potential and commitment to achieve Star quality within 3 years (OSHA, n. d.). It recognizes employers who provide effective safety and health protection.
- Demonstration status is designed for worksites that would like to demonstrate that they can provide a star quality safety and health protection by following specific program criteria (Keller, 2005). These worksites want to test alternatives to current Star eligibility and performance requirements (OSHA, n. d.)

Requirements associated with the various VPP statuses. VPP applicants will be recognized in three different statuses: Star, Merit and Demonstration. Each status has to meet VPP criteria as required by OSHA.

Star status is considered as the highest level of VPP participation. A Star status worksite is recognized as an excellent workplace which implements and performs

effective and outstanding health and safety management system. A Star site must have all VPP requirements in place and be working effectively for one year prior to approval. In addition, a star worksite must have an injury and illness rate 10% below the Bureau of Labor Statistics average for their industry classification (Roig & Ruble, 2003). Star status typical characteristics are as follows:

- Management is committed to providing a safe workplace and shows that commitment through their involvement and provision of appropriate resources.
- Employees are involved in the health and safety management system in a significant way.
- Contract workers are covered in a manner similar to that of employees.
- Annual program reviews are conducted that evaluates the strengths and weaknesses of the health and safety programs in the worksite.
- A workplace hazard identification and analysis system is in place and working to identify and control risks
- Hazard control programs are in place
- A written industrial hygiene program is in place and is fully implemented
- The worksite has an effective accident and incident investigation program, including investigation of near misses.
- Emergency response programs are in place and are practiced at least annually.
- Training programs are in place so that managers, supervisors, non-supervisors and contractors are knowledgeable about hazards in the workplace, hazardous conditions, signs and symptoms of workplace-related illnesses, and safe work procedures.

A Merit worksite is recognized as a site that has good health and safety management systems, but still has to take additional steps to reach Star quality. For Merit status, the site illness and injury rates must either be below industry average or be reduced to below the industry average within two years. All the VPP requirements must be operational, or at the minimum must be ready for implementation at the date of approval. Once a worksite is recognized as Merit status, the site must identify and complete a set of goals before achieving start status (Roig & Ruble, 2003).

Applicant evaluation process. Onsite evaluation is the process conducted by the OSHA evaluation team to the applicant site or participant site to evaluate whether the site qualifies to participate, to continue participation, or to advance within the VPP. An OSHA evaluation team normally consists of a team leader, a backup team leader, safety and health specialists, and other specialists as appropriate (Roig, R & Ruble, B, 2003).

The onsite evaluation process consists of three primary methods: document review, walkthrough, and interviews. The documents listed below are part of the written safety and health management system that must be reviewed by OSHA team: (Roig, R & Ruble, B, 2003).

- Injury/Illness Data. In order to verify that the site is properly and accurately recording the data, all documents related to injury and illness data must be reviewed by OSHA evaluation team. Documents include a summary of occupational injuries and illnesses, incentive programs, first report of injury, accident and near-miss investigation reports, and first-aid reports. In addition, reports about medical surveillance such as audiometric testing records and respirator fit-test records must be reviewed.

- Management Leadership. Management leadership documents that must be reviewed include the statement of commitment to safety and health of management, the written goals and objectives for safety and health, an annual safety and health evaluation, job descriptions, performance standards and resource documents including budget projections.
- Employee Involvement. Files regarding employee involvement that must be reviewed include self-inspection forms and records, accident investigations, hazard analyses, and employee reports of hazards. Additionally, if it is applicable to the site, documents attesting to union support and safety and health committee records must be reviewed.
- Worksite Analysis. Documents regarding to worksite analysis that must be reviewed include baseline safety and industrial hygiene surveys, self-inspection forms and records, health hazard assessment and monitoring records, hazard analysis forms and reports, accident/incident investigation reports, hazard reporting system for employees, annual safety and health management system evaluations, site audits, documents about managing contractor safety and health, and trends analysis reports of injury/illness, accidents, employee hazard report.
- Hazard Prevention and Control. Documents relating to hazard control programs that required by OSHA standards (such as lockout/tagout, hazard communication, respiratory protection, process safety management, bloodborne pathogens, confined space entry, and emergency response, etc.), preventive maintenance schedule documents, hazard correction/work order and tracking reports, safety

rules, safe work procedure and practices, disciplinary system document including a review of policy, and engineering studies.

- Training. Files that must be reviewed include OSHA standards requiring training curriculums, new employee and contractor orientation curriculums, and Training attendance records and tracking method.
- Other related documents that support and verify that all VPP requirements are met.

Summary

As discussed earlier in this chapter, the readiness of company XYZ to qualify for VPP and an analysis into management systems was conducted. It was stated that a management system is an organized set of components that enable an organization to accomplish set goals (Pascal, 1997), whereas a safety management system is an integrated set of work practice, beliefs and procedures for monitoring, supporting and improving the quality of safety performance in an organization (CAMC, 2005).

A discussion of various safety management systems, to compare with a VPP, included International Safety Rating System (ISRS), a modern safety program that provides the ways of analysis for each element of the safety program; Proctor and Gamble Key elements, designed to emphasize continuous improvement in accomplishing the preferred health and safety results; OHSAS 18001, the specific management system for managing health and safety responsibilities of an organization; ANSI Z10.200, developed to assist organizations improve safety and health performance, minimize workplace risks and reduce the cost of occupational fatalities, injuries and illnesses; National Safety Council, designed to provide equal consideration of elements of

administration, operation and culture to achieve and maintain safety performance; and the VPP, created by OSHA to recognize and partner with worksites that implement exemplary systems to manage the health and safety of employees.

As stated by OSHA, 2000 the purpose of VPP is to emphasize the importance of, encourage the improvement of and recognize excellence of employer-provided, employee-participative, and generally site-specific occupational safety and health programs. The VPP elements are composed of management leadership and employee involvement, worksite analysis, hazard prevention and control, and safety and health training. An applicant evaluation process is the process conducted by the OSHA evaluation team to the applicant site to evaluate whether the site qualifies to participate, to continue participation, or to advance within the VPP.

Chapter III: Methodology

Introduction

The purpose of this study was to assess the readiness of Company XYZ to qualify for VPP status and provide feedback to the company for the future improvement opportunities to become ready and qualify for VPP.

The objective of this study are to identify and define VPP status, to examine company XYZ profile, to compare VPP requirements with the company profile and to identify the deficiencies or weaknesses and suggest the solutions.

This chapter is devoted to describing the methods and procedures used to achieve the objectives of the study. The methods and procedures included a review of literature related to health and safety management systems that are utilized and known nationally and internationally which include International Safety Rating System (ISRS), Proctor and Gamble Key Elements, OHSAS 18001, ANSI Z10.200 (Draft), National Safety Council safety management system and OSHA VPP. In addition, literature associated with the readiness assessment of the company to qualify for VPP status was reviewed. Moreover, the methodology included a review of the company profile and all written programs regarding to safety and health that associated with VPP requirements. An interview regarding VPP was conducted with the safety manager or an individual who could be involved in VPP application process of Company XYZ to gather the information about level of readiness to achieving VPP status of the company.

Subject Selection and Description

In order to gather information for assessing readiness of the company, a safety manager or individual involved in preparing the company to attain OSHA VPP was

selected for an interview. The company is not identified by company name; it will be identified as Company XYZ. The safety manager of the company was interviewed based on the information regarding VPP.

Instrumentation

The assessment consisted of an on-site personal interview with a semi-structured format. The interview questions were developed from the literature review to ensure that all the study objectives are addressed and covered and included VPP elements and safety management systems that the company currently has in place. The instruments used in this study are the interview guide and the self-assessment form by J. J. Keller. The interview guide and the self-assessment form will be provided to respondent one week prior to the scheduled interview.

Data Collection

The safety professional of company XYZ was contacted and informed by phone and email one week before the scheduled interview. The participant was asked to complete the consent form provided by the researcher and mail it back. The researcher performed an on-site personal interview which was taped. Neither the name of the company or the individual was used in this study; the company was described as XYZ Company. The self-assessment form was sent to the safety professional to complete and send it back via email.

Data Analysis

The primary purpose of this study was to evaluate the readiness of the company to qualify for VPP status. The data from the literature review, company profile review and the interview conducted was analyzed in the following manners:

1. OSHA's VPP requirements for each status of VPP.
2. VPP elements which worksite applicant must meet the criteria to qualify for VPP.
3. Safety management systems that the site applicant must have in place in order to become VPP worksite.

Limitations

There are a few limitations in the methodology used in this study. One of those limitations is that there could have been a larger quantity of questions, compared to the 20 questions that were asked to the subject to provide possibly more detailed information. In addition, in the process of recording the information from the interviewee, not all exact answers may have been transposed in there entirety. In regards to the responses by the interviewee, the researcher may have misinterpreted some parts of information received from the interview process.

Another limitation of this study may have been that only one individual was interviewed in the interview process. Increasing the number of individuals interviewed at Company XYZ would increase the amount, as well as possibly the quality and accuracy, of the answers. Also, the company might not have been willing to provide all necessary information for reasons of confidentiality.

Chapter IV: Results

Introduction

The purpose of this study was to assess the readiness of Company XYZ to qualify for VPP status and provide feedback to the company for future improvement opportunities to become ready to qualify for VPP.

This chapter includes the results of the study, resulting demographics, finding of each objectives of the study, interview analysis and a final discussion. This chapter concludes with a summary regarding the finding of this study on VPP. Objectives of the study were as follows:

1. To identify and define VPP status
2. Determine eligibly status by comparison of injury statistics against the Bureau of Labor Statistics
3. To compare VPP requirements with the company profile
4. To identify the deficiencies or weaknesses and suggest solutions

Demographic Information

The subject selected for this study was the safety director from the XYZ Company who has an interest in becoming the VPP certified worksite. A personal interview was recorded and lasted approximately 40 minutes.

Results

The results of this study will be presented regarding objectives of the study.

To identify and define VPP status. VPP applicants will be recognized in three different statuses: Star, Merit and Demonstration. Each status has to meet VPP criteria as required by OSHA.

Star status is considered as the highest level of VPP participation. A Star status worksite is recognized as an excellent workplace which implements and performs effective and outstanding health and safety management system. A Star site must have all VPP requirements in place and be working effectively for one year prior to approval. In addition, a star worksite must have an injury and illness rate 10% below the Bureau of Labor Statistics average for their industry classification (Roig & Ruble, 2003). Star status typical characteristics are as follows:

- Management is committed to providing a safe workplace and show that commitment through their involvement and provision of appropriate resources.
- Employees are involved in the health and safety management system in a significant way.
- Contract workers are covered in a manner similar to that of employees.
- Annual program reviews are conducted that evaluates the strengths and weaknesses of the health and safety programs in the worksite.
- A workplace hazard identification and analysis system is in place and working to identify and control risks
- Hazard control programs are in place
- A written industrial hygiene program is in place and is fully implemented
- The worksite has an effective accident and incident investigation program, including investigation of near misses.
- Emergency response programs are in place and are practiced at least annually.

- Training programs are in place so that managers, supervisors, non-supervisors and contractors are knowledgeable about hazards in the workplace, hazardous conditions, signs and symptoms of workplace-related illnesses, and safe work procedures.

A Merit worksite is recognized as a site that has good health and safety management systems, but still has to take additional steps to reach Star quality. For Merit status, the site illness and injury rates must either be below industry average or be reduced to below the industry average within two years. All the VPP requirements must be operational, or at the minimum must be ready for implementation at the date of approval (Roig & Ruble, 2003).

Demonstration status is designed for worksites that would like to demonstrate that they can provide a star quality safety and health protection by following specific program criteria (Keller, 2005). These worksites want to test alternatives to current Star eligibility and performance requirements (OSHA, n. d.)

Determine eligibility status by comparison of against injury statistics against the BLS. Table 1 and table 2 represent the incident rates and the lost and restricted workday case rate of the company XYZ. According to the Bureau of Labor Statistics' workplace injuries and illness rate in 2002, the rates presented below show that in the past three years, both of the company's rates are below the BLS average for the same industry classification (BLS, 2003).

Table 1

Injury and illness incident rates for years 2002-2004

Year	Rate
2002	3.42
2003	2.39
2004	2.81
Site three year average	2.87
BLS industry average	9.30

Table 2

Lost and restricted workday case rates for years 2002-2004

Year	Rate
2002	1.71
2003	0.53
2004	1.12
Site three year average	1.12
BLS industry average	2.2

To compare VPP requirements with the company profile. The results of this section will be based on the interview analysis. The interview questions were created based on a VPP self-assessment written by J. J. Keller. The completed self-assessment form is presented in Appendix D. The interview results will be analyzed in following manner:

- Management leadership and employee involvement

Q: Please describe how the safety and risk control function fits into the overall management structure?

In the XYZ company, safety is one of the main parts of production. It is treated as a support function of the production. There are safety goals to include production to employees. One of the goals is to decrease incident rate, if the goal is met then $500 will go to through 401K. This is also an example of how company XYZ uses safety as an incentive and reward system for employees to help include it into the overall management structure.

Q: Describe the safety and risk control process for assigning accountability in your organization.

For the safety and risk control process for assigning accountability in company XYZ, employees at all level are accountable for their own safety. A document entitled "Department Manager-Supervisor roles and responsibilities" was presented during the interview. The document was reviewed and is used to indicate who is accountable for what within the different departments. All staff have identified and measurable safety and health goals. Tacit authority is given to carry out assigned responsibilities. Additional authority could be provided, directing more responsibility to the managers and supervisors.

Q: How does your organization's mission/vision statement incorporate safety?

Safety is set as a priority within the XYZ Company. The company has established the concepts of safety process, safety vision and safety mission. The company objective regarding safety is to bridge technical knowledge with employee effort and ingenuity to build a safe working environment which will

lead to improved production, quality and operation efficiency. The company is committed to the concept of safety process and key concepts of safety process which includes working safely in all aspects of performing one's job tasks. The focus of these combined efforts is driven by the department, with direct manager, supervisor and employee involvement.

Q: Describe your program for ensuring that all contract workers who do work at your site are provided the same safe and healthful working conditions and the same quality protection as your regular employees.

The company has utilized contractor orientation programs and safe practices to ensure that all contract workers who perform work at the site are provided the same safe and healthful working conditions and quality protection as regular employees. It is a company requirement that the contractors must meet all the criteria set by the company before they can perform the job in the facility.

Q: Describe the ways that employees are involved in your safety and health program.

Employees are encouraged to take and active role in the safety and health programs. They lead and are involved in many different teams such as ergonomics, emergency response. Also, there are numerous types of different training that employees are required to be involved in.

Q: What tools do you use to assess employee perceptions of the organization's safety/risk control program(s)?

A behavior audit is being utilized as one of the tools for assessing employee perceptions of the organization's safety programs.

- Worksite Analysis

Q: How new facilities, equipment, materials, and processes are analyzed for potential hazards prior to use.

The XYZ company uses a program called "PERSIS" (Personnel Safety Inspection System) to analyze potential hazards for new facilities, equipment, materials, and processes prior to use. The company also performs a pre start – up inspection using a daily inspection sheet. In addition, a hazard awareness program is conducted to help increase safe worksite practices.

Q: Indicate how you search the site for potential safety and health hazards. Examples are industrial hygiene surveys, comprehensive safety reviews.

Industrial hygiene monitoring of toxic substances and noise are performed regularly. Also, a safety professional, an ergonomist and an industrial hygienist come and examine the site on a scheduled basis.

Q: Describe how you routinely perform a worksite safety and health general hazard?

For worksite safety general inspections, an audit based on OSHA criteria, walkthrough inspections and a weekly site search are routinely performed in order to search for potential safety and health hazards at the worksite. Also hazard identification program is an active process for the company, and training is provided to employees.

Q: Does your site routinely examine and analyze hazards associated with individual jobs, processes, or phases?

Job Hazard Analysis and Job Safety Analysis are utilized to communicate and reinforce safe practices which results in improving work practices.

Q: Describe how employees notify management of potential safety or health hazards. What is management's procedure for follow-up and tracking corrections?

Employees are encouraged to report safety issues and are informed of items open or completed. The company uses a new system called MP2. This system allows employees to be able to notify safety personnel and the management of potential hazards in workplace. As an added benefit, this system can be tracked and followed up.

Q: Explain your site's accident investigation procedures. Are near-miss incidents investigated? Is a training guidance given to investigators?

For accident investigations, currently, the company utilizes the Tap Root system as part of incident analyses. This program provides the company to come up with the corrective actions such as trainings, audits, implementing new systems and/or performing Job Safety Analysis. Incident trends are tracked and reported monthly, to identify and address trends. The training guidance is given for the accident investigating teams.

- Hazard Prevention and Control:

Q: Does your facility have access to certified safety and health professionals, and how often?

There is a safety professional onsite as well as a Corporate Safety Director. Also, the company has access to certified safety and health professionals and

utilizes their services on a scheduled basis. The plant contracts with consultants to perform specialized tasks such as industrial hygiene.

Q: What is the consistent disciplinary system that operates for all employees including supervisors and managers who disregard the rules?

Employees receive written safety rules and classroom training annually to review plant and department safe practices. For a consistent disciplinary system applied to all employees including supervisors and managers who disregard the rules, the company utilizes a progressive discipline program. It consists of four steps: verbal warning, written warning, suspension and termination.

Q: Describe your site's personal protective equipment requirements

For the site's personal protective equipment (PPE) requirements, all employees in production areas are required to wear safety glasses and ear protection if machines are being operated. Written safe practices address the need to comply with PPE requirements.

Q: Describe your site's emergency planning and preparedness program

For the site's emergency planning and preparedness program, the company has first aid and cardiopulmonary resuscitation (CPR) trained personnel available onsite during all shifts. In addition, the facility has onsite medical and emergency services as well as local ones. Company XYZ has written plans developed to cover emergency situations.

Q: Describe procedures for the preventive maintenance of the equipment

Monitoring and on-going maintenance of workplace equipment is conducted. The plant has maintenance personnel perform the inspections. The company also

has safety audit personnel to look at machine guarding, ventilation, electric cords etc.

- Safety and Health Training

Q: Describe the formal and informal safety and health training programs provided for managers, supervisors, and employees.

New employees are given a 3 day safety related orientation on beginning their employment with the company. There are also weekly and monthly training sessions to build upon what has been taught during the orientation. All staff participates in monthly safety and health training.

Q: Do you provide supervisors' training on hazard communication, personal protective equipment, and handling of emergency situations?

The company provides supervisor training on hazard communication (HAZCOM), personal protective equipment (PPE), and the handling of emergency situations. Training is conducted annually for employees on the use and care of PPE. Emergency preparedness drills and training are conducted semi-annually.

Q: Describe how you verify the effectiveness of the training given. (Sample attendance lists and tracking methods)

To verify the effectiveness of the training given to employees, a performance base, a knowledge check and quizzes are used to evaluate employee understanding. Documentation of all training is provided for all employees who participate in training.

2. To identify the deficiencies or weaknesses and suggest solutions

According to previous literature reviewed of each VPP status requirements, the comparison between the company incident rates and lost and restricted workday case rate to the BLS average for the same industry classification, the results from interview analysis and the results from the VPP self-assessment form, there are deficiencies and weaknesses which occur within an organization. Deficiencies identified from this study are listed below:

- Outdated rate data of the company. The rates of the incident and lost and restricted workday case presented in table 1 and 2 are not updated to the year of 2005.
- Inadequate of management involvement. The management does not get involved much unless the accidents or deficiencies occur.
- Lack of necessary resource. There is only one safety resource dedicated and responsibilities for various activities are assigned to staffs and employees.
- Lack of assistance for becoming a VPP worksite. There is no VPP team to assist the company in achieving VPP status.

Discussion

The objective of this study is to assess the readiness of the company XYZ and provide improvement suggestions for the company to achieve VPP status in the future. The review of literature included an overview of management systems, general information of a Health and Safety Management System, a discussion of various safety management systems and an overview of VPP.

According to the review of literature, the key elements of VPP are similar to other safety management systems. They focus on continual improvement and the elements for each system are similar. Criteria and requirements for each status of VPP were revealed previously. After the interview and the VPP self- assessment were analyzed, it can be stated that company XYZ has implemented and performed most of comprehensive and effective safety and health management systems that are required to be implemented according to the VPP requirements. The results received and interpreted from the interview, the company appears to be having some deficiencies that should be improved in order to become ready for applying for VPP certified worksite. Although, the company has decided not to apply for VPP status, the results and recommendations of this study can provide improvement opportunities to company XYZ for becoming a VPP certified worksite in the future. The summary, conclusions, and recommendations will be provided in the next chapter.

Chapter V: Summary, Conclusion and Recommendations

Introduction

This chapter provides a summary, conclusions, and recommendations of this study.

Summary

The primary purpose of this study was to assess XYZ Company's readiness to qualify for Voluntary Protection Program (VPP) status. The objectives of this study were:

1) To identify and define VPP status
2) To determine eligibility status by comparison of injury statistics against the Bureau of Labor Statistics (BLS)
3) To compare VPP requirements with the company profile
4) To identify the deficiencies or weaknesses and suggest solutions

Methods

Methods and procedures of this study included a review of literature relevant to VPP and other safety and health management systems. A personal interview was conducted with the safety director of company XYZ. The interview data was collected using an interview guide as an instrument. This instrument was in the form of 20 questions developed based on J.J.Keller VPP document. Also, the VPP self-assessment form was used as another instrument to assist the researcher in assessing the company's qualification status.

Findings

The findings answer the four objectives of the study by utilizing the data gathered from the review of related literature, the personal interview and the self-assessment form.

1. The XYZ company's three year average incident and lost and restricted work day case rates for the year of 2002 – 2004 were 2.87 and 1.12 respectively which are below the BLS average for the same industry classification according to the BLS data of 2002 (BLS, 2003).
2. The XYZ Company implemented and performed most of required comprehensive safety and health management systems regarding the essential four VPP elements management leadership and employee involvement, worksite analysis, hazard prevention and control, and safety and health training.
3. The safety director of company XYZ was very knowledgeable in regards to the information and requirements for VPP status. They strongly believed that the company will be able to achieve VPP status in the future, if all the safety deficiencies are addressed, corrected and improved.
4. The deficiencies identified from the results are listed below:
   - 4.1 The management commitment of the company regarding safety and health management systems was not adequate, according to the personal interview.
   - 4.2 The XYZ company's incident and lost and restricted work day case rates for the year of 2002 – 2004 were below the BLS average for the same

industry classification according to the BLS data of 2002 (BLS, 2003). However, the rates of the company were not updated to the year of 2005.

4.3 There is a lack of necessary resources. There is only one dedicated safety resource (the current safety director) responsible for the overall safety program at the XYZ company. Other various activities related to safety are assigned to staffs and employees.

4.4 There is a lack of assistance to the process for becoming a VPP worksite. There is no VPP team to assist the company in achieving VPP status.

5. The XYZ Company did not appear to be completely ready for becoming a Star Status VPP worksite yet, according to the results from the interview and assessment form.

Conclusions

The assessment of XYZ Company concluded that it was not completely ready to become a Star Status VPP worksite. However, the self assessment score indicated that if the company could complete all items listed on the self-assessment form (Appendix B), within a few months, the company may qualify for recognition as an OSHA-approved Merit program participant. The company three year average incident and lost and restricted work day cases were below the average for the same industry classification according to the BLS data of 2002; the company meets one of the VPP requirements. However, the rates are not updated to the year of 2005. The weaknesses of the company for becoming a VPP worksite were addressed above. As discussed, if the company plans to achieve VPP status, all deficiencies must be corrected.

Recommendations

1. Consider updating the injury and illness rates, and lost and restricted workday case rates should be brought up to date. As well as reviewed on a monthly rate to help identify potential trends in order to improve the overall safety practices and processes in the XYZ Company.
2. Consider assigning adequate authority to those persons who are responsible for safety and health, in order to them to be able to carry out their responsibilities.
3. Consider providing and directing adequate resources including time, funding, training and personnel to those who responsible for safety and health, so they are able to carry out their responsibilities.
4. Develop a VPP team within the XYZ Company if time, resources, and budgets allow the company to do so.
5. Consider updating the safety committee on VPP and its requirements. This consideration also depends on the available resources, time, and personnel.
6. Consider assigning a timeline of goals in relation to the requirements necessary to reach VPP Star status to the safety committee.
7. Develop and coordinate a method of compensation for any additional duties that would be assigned to employees in the VPP process.
8. Management must be involved with this newly assigned VPP team and be up-to-date, support and enforce the goals pre-defined by the safety director and the safety committee/VPP team.

9. Consider maintaining a written safety and health management system that documents the elements, procedure for implementing the elements, and other safety and health programs including those required by OSHA standards.
10. Consider conducting an annual evaluation of the safety and health management system on scheduled basis, in order to maintain knowledge of the current and potential hazards of the site. In addition, this evaluation would help to keep the effectiveness of the system elements by ensuring that the previous year's recommendations are completed to modify goals, policies and procedures.
11. Consider notifying all employees, including new hires and contractors about the site's participation in VPP program. They should be informed about the fundamentals of VPP, the goal of the company to become VPP star status, and the benefits of achieving a VPP worksite.
12. Consider adding the VPP subject into the new employee orientation/training, to ensure that they understand the VPP goal of the company.
13. Consider applying for demonstration status in order to prepare and test alternatives to current star eligibility and performance requirements

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Appendix A: Interview Guide

Management Leadership and Employee Involvement

1. Describe how the safety & risk control function fits into the overall management structure?
2. Describe the safety/risk control process for assigning accountability in your organization.
3. How does your organization's mission/vision statement incorporate safety?
4. Describe your program for ensuring that all contract workers who do work at your site are provided the same safe and healthful working conditions and the same quality protection as your regular employees.
5. Describe the ways that employees are involved in your safety and health program.
6. What tools do you use to assess employee perceptions of the organization's safety/risk control program(s)?

Worksite Analysis

1. How new facilities, equipment, materials, and processes are analyzed for potential hazards prior to use.
2. Indicate how you search the site for potential safety and health hazards. Examples are industrial hygiene surveys, comprehensive safety reviews.
3. Do you routinely perform a worksite safety and health general inspection?
4. Does your site routinely examine and analyze hazards associated with individual jobs, processes, or phases?
5. Describe how employees notify management of potential safety or health hazards. What is management's procedure for follow-up and tracking corrections?
6. Explain your site's accident investigation procedures. Are near-miss incidents investigated? Is a training guidance given to investigators?

Hazard Prevention & Control

1. Does your facility access to certified safety and health professionals and how often?

2. What is the consistent disciplinary system that operates for all employees including supervisors and managers who disregard the rules?
3. Describe your site's personal protective equipment requirements.
4. Describe your site's emergency planning and preparedness program
   - Do first aid and CPR- trained personnel available onsite during all shifts?
   - Does the facility have an onsite or nearby medical and emergency services?
   - Do you have written plans to cover emergency situation?
5. Describe procedures for the preventive maintenance of the equipment.

Health & Safety Training

1. Describe the formal and informal safety and health training programs provided for managers, supervisors, and employees.
2. Do you provide supervisors' training on hazard communication, personal protective equipment, and handling of emergency situations.
3. Describe how you verify the effectiveness of the training given. (Sample attendance lists and tracking methods)

Appendix B: VPP Self-Assessment of Company XYZ

Management Leadership and Employee Involvement

- ☒ A managerial commitment to worker safety and health protection.
- ☒ Top management's personal involvement.
- ☒ Safety and health concerns integrated into your overall planning cycle.
- ☒ Safety and health protection managed in the same way as your productivity and quality are managed.
- ☐ A written safety and health program appropriate for the size of your site and your industry that addresses all the elements in this checklist.
- ☒ A results-oriented safety and health policy.
- ☒ Clearly assigned safety and health responsibilities with documentation of accountability from top management to line supervisors.
- ☒ Adequate authority given to carry out assigned responsibilities.
- ☒ Necessary resources to meet responsibilities.
- ☒ Quality protection for all contract employees equal to that provided for your own employees.
- ☒ Employee involvement in activities that have a major effect on your safety and health program.
- ☒ Annual safety and health program evaluations with written narrative reports, recommendations for program changes, action plans, and verification procedures.

Workplace Analysis

- ☒ A method, such as comprehensive safety and industrial hygiene surveys, to identify existing or potential hazards in your workplace.
- ☒ A pre-use analysis procedure for new processes, materials, or equipment to determine potential hazards.
- ☒ Routine industrial hygiene monitoring of toxic substances and noise.
- ☒ Monthly self-inspections (weekly for construction) with written documentation and hazard correction tracking.
- ☒ Routine hazard analysis procedures such as JHAs and JSAs that result in improved work practices and/or training for employees.
- ☒ A written hazard reporting system enabling employees to pass on their observations or concerns to management without fear of reprisal.
- ☒ Accident investigations with written documentation.
- ☒ Method of documenting all identified hazards until they are controlled or eliminated.
- ☒ Analysis of trends in injury/illness experience and in hazards found to identify patterns of problems and to implement program adjustments.

Hazard Prevention and Control

- ☒ Access to certified safety and health professionals.
- ☒ Engineering and administrative controls adequate for the hazards at the worksite.

- ☒ Written safety rules and practices that are understood and followed by all employees.
- ☒ A consistent disciplinary system applied to all employees (including supervisors and managers) who disregard the rules.
- ☒ Written rules for use and maintenance of personal protective equipment.
- ☒ Written plans to cover emergency situations.
- ☒ Hazard correction tracking procedure.
- ☒ Onsite or nearby medical and emergency services.
- ☒ First aid and CPR-trained personnel available onsite during all shifts.
- ☒ Use of occupational health professionals in hazard analysis as appropriate.
- ☒ Documented ongoing monitoring and maintenance of workplace equipment.

Safety and Health Training

- ☒ Manager, supervisor, and employee training with emphasis on safety and health responsibilities.
- ☒ Training in the use and maintenance of all necessary personal protective equipment.
- ☒ Emergency preparedness drills, including annual evacuations.
- ☒ Documentation of all training received, including assessment procedures