Development, Validation, Implementation and Enhancement of a Voluntary Protection Program Center of Excellence (VPP CX) Capability for Department of Defense (DoD)

Voluntary Protection Program (VPP) 101
Objectives

After this training you will be able to:

• State the background information on the VPP
• Outline Star and Merit Programs
• Discuss VPP benefits and current statistics
• List current participants in VPP
• Define the 4 parts of the VPP Process
• Recognize the steps of the Onsite Evaluation Assessment
• Interpret the Gap Analysis Report and Action Plan.
Could you find this in your Organization?
In 1982, the Occupational Safety and Health Administration (OSHA) developed VPP to recognize and promote effective worksite-based safety and health management systems.
VPP Background

- Preventable injuries and illnesses cost the DoD an estimated 10 to 21 billion dollars annually, according to the National Safety Council.
- “World Class Organizations don’t accept preventable accidents.”

Image courtesy of www.defenselink.mil

Donald Rumsfeld
Star and Merit Recognition Programs

- **Star Site**
  - Highest level of recognition
  - All VPP requirements met
  - Key program requirements in effect at least one year
  - Rates are below the national average.

- **Merit Site**
  - Elements and Sub-elements in place
  - Systems may not all be at star quality
  - Rates may be above the national average
  - Limited to one three-year term.
Keys to Success in VPP Program

• Culture is the key.
• Promote safety as a core value in everyday work as compared to a priority.
• Create a supportive atmosphere to foster safety as a core value.
• Establish a framework rather than a “to do list”.
• Determine organizational values which empowers the culture and the core values.
VPP Benefits

• The average VPP worksite has a Days Away, Restricted or Transferred (DART) case rate 52% below the average for its industry.

• Fewer injuries and illnesses mean greater profits as workers’ compensation premiums and other costs plummet.

  – Lower worker’s compensation costs (20+%/yr)
  – Positive Return on Investment (150+%)
Growth of VPP
Federal and State As of 1.31.06

Source: OSHA, Office of Partnership & Recognition
Current Federal VPP Star Participants

- Tobyhanna Army Depot
- National Aeronautics & Space Administration (NASA)
- Three United States Naval shipyards
- United States Postal Service
- Defense Logistics Agency
- Self-Managed “e-VPP” Department of Energy
VPP Process

• VPP is a process, a culture, not an inspection.
• There are 4 main parts to this process:
  – Management Leadership and Employee Involvement
  – Work Site Analysis
  – Hazard Prevention and Control
  – Safety and Health Training.
Management Leadership and Employee Involvement
Management Leadership

• Clearly established policies that have been communicated to & understood by all employees

• Established goals and objectives for meeting the goals.
Management Leadership

- Managers must provide visible leadership by:
  - Establishing clear lines of communication
  - Creating an environment that allows for reasonable employee access to top site management
  - Setting example of safe and healthful behavior
  - Ensuring all workers, including contractors are provided equally high quality safety and health protection
  - Clearly defining responsibilities in writing.
Employee Involvement

• The site culture **must** enable and encourage effective employee involvement in at least four meaningful ways:
  – Participation in committees, audits, investigations, etc.
  – Receive feedback from suggestions, hazard reports, etc.
  – Must be notified of VPP site participation and rights to report hazards
  – Demonstrate understanding of basic principles of VPP.
Contract Workers

• VPP Site contractor programs must include a documented oversight and management system that ensures the contractor’s site employees are provided effective protection.

• VPP sites are expected to encourage contractors to develop effective safety and health program management systems.
Contract Workers

• Provisions to monitor contractor adherence to site safety and health rules follow:
  – Worksite safety
  – Health rules
  – Procedures.

• Must include provisions for removing contractor employees from site for violations.
Work Site Analysis
Work Site Analysis

• Worksite analysis includes the following systems and methods:
  – Baseline Safety/Health Hazard Analyses
  – Hazard Analysis
  – Pre-use Analysis
  – Documenting and Use of Hazard Analyses
  – Routine Inspections
  – Employee Hazard Reporting System
  – Industrial Hygiene
  – Accident/Incident Investigations
  – Trend Analysis.
Baseline Safety/Health Hazard Analysis

- The baseline analysis should:
  - Establish initial levels of exposure for comparison to future levels
  - Document existing safety/health hazards and how they are currently controlled
  - Identify hazards for further study
  - Cover entire work site.
Hazard Analysis

• The site must perform analysis of safety and health hazards associated with routine jobs and processes. Acceptable techniques include:

  – Job Safety Analysis (JSA)
  – Job Hazard Analysis (JHA)
  – Process Hazard Analysis (PrHA)
  – Or other equally effective method.
Hazard Analysis

- The results must be included in training and hazard control programs
- The analysis must be conducted for significant changes such as:
  - Non-routine tasks
  - New process, materials, equipment, facilities.
Pre-Use Analysis

• In the design/procurement phase of any new development, the safety and health impact to employees should be analyzed before use. Potential hazards should be identified so they can be prevented. Keep this in mind when developing new:
  – Facilities
  – Processes
  – Chemical
  – Equipment
  – Operations.
• Analysis Documentation Should:
  – Consider both health and safety issues
  – Include analysis dates
  – Be used in job training and future modifications/planning
  – Be updated as changes are made that invalidate initial analysis.

• Analysis Documentation Must Identify:
  – Process step(s) being analyzed
  – Hazard controls in place
  – Recommendations for additional controls
  – Responsible parties.
Routine Self-Inspections

• The site must have a system for conducting routine self inspections. The system must:
  – Include written procedures/guidance
  – Use qualified personnel to conduct inspections
  – Results in documentations of findings and track the hazard elimination or control to completion.
Employee Hazard Reporting System

• The site must have a system that employees can use to notify management of conditions that appear hazardous. Notification system:
  – Must be in writing
  – Must not result in employee reprisal & may be anonymous
  – Must provide timely and appropriate responses
  – Must track the hazard elimination or control to completion.
The Industrial Hygiene (IH) Program must be a written program that documents procedures and methods for:

- Identification
- Analysis
- Control of health hazards.
Industrial Hygiene Program

• The program must address:
  – When IH surveys beyond the baseline analysis are required
  – Sampling protocols and methods
  – Comparison of results to OSHA Permissible Exposure Limit (PEL), Threshold Value Limit (TLV), or self-imposed standards
  – Methods to communicate results to employees and management
  – Use of results to determine selection of controls and to determine if controls are adequate.
• Industrial Hygiene Sampling must:
  – Be performed by Industrial Hygienist (initial sampling can be conducted by trained safety staff) or qualified contractor
  – Use nationally recognized sampling and analysis procedures
  – Provide a report that is communicated to management.
Industrial Hygiene Program

- Industrial Hygiene reports must describe:
  - Work process
  - Existing controls
  - Sampling time
  - Exposure calculations
  - Duration
  - Route and frequency of exposure
  - Number of exposed employees.
Accident/Incident Investigations

• The site must investigate all accidents & near misses.

• The investigation must:
  – Be conducted by trained personnel
  – Identify all contributing factors
  – Identify failures of the safety and health management system and recommend improvements.
Accident/Incident Investigations

- The accident/incident investigation must result in:
  - Assigned priorities for hazard elimination or control
  - A written report of findings that is available to employees
  - No undo assignment of employee blame or reprisal.
• Used to determine trends to:
  – Direct resources
  – Prioritize hazard controls
  – Modify goals, objectives and training.

• Must include information from:
  – Injury/illness history
  – Hazards identified during inspections
  – Employee reports of hazards
  – Accident investigations
  – And/or other means, etc.

• Must share results with management and employees.
Hazard Prevention and Control
Hazard Controls

• The site must have adequate access to certified safety professionals (CSP), certified industrial hygienists (CIH), etc.

• Site hazards identified during the hazard analysis process must be eliminated or controlled by developing and implementing the systems discussed in this section.

• The hazard controls must be understood and followed by affected parties, and appropriate to the hazard and size of the worksite.
The following hierarchy should be used in selecting actions to eliminate or control hazards:
Hierarchy of Controls

1. Engineering Controls –
   Most reliable and effective.

2. Administrative Controls –
   Significantly limit daily exposure to hazards by controlling or manipulating the work schedule or manner in which work is performed, e.g., job rotation.
3. Work Practice Controls – Includes workplace rules, safe and healthful work practices, and procedures for specific operations.

4. Personal Protective Equipment (PPE) – the use of PPE reduces employee exposure to hazards when engineering and administrative controls are not feasible or effective in reducing these exposures to acceptable levels.
Hierarchy of Controls

5. Hazard Control Programs – Includes, but is not limited to:

- Control of hazardous energy
- Confined space entry
- Hazard communication
- Respiratory protection
- Hearing conservation
- Fall protection, etc.
For sites meeting the threshold requirements for coverage outlined in 29 CFR 1910.119, appendix A.
Preventive Maintenance System

• The system must be in written form, and document the monitoring and maintenance of workplace equipment such as:
  – Preventive and predictive maintenance, to prevent equipment from becoming hazardous.
Hazard Correction Tracking

• The site must have a system for initiating and tracking hazard elimination or controls, identified through the various safety and health programs, in a timely manner.
Occupational Health Care Program

• Program must include:

  – Use of licensed health care professionals to assess employee health status for prevention of and early recognition and treatment of injury and illness

  – Pre-employment physicals, routine periodic monitoring, i.e., audiograms, lung function tests

  – Access to certified first aid and CPR providers, physician care, and emergency medical care for all shifts within a reasonable time and distance.
Disciplinary System

- Must be in written form
- Clearly communicated and equitably enforced
- Include procedures for disciplinary action or reorientation of managers, supervisors, and non-supervisory employees who:
  - Break or disregard safety and health rules, safety work practices, proper material handling, or emergency procedures.
Emergency Procedures

• Emergency procedures must be developed for all shifts
• Must be written and communicated to all
• List requirements for PPE, first aid, medical care, emergency egress
• Include provisions for emergency telephone numbers, exit routes
• Include training drills such as annual evacuation drills, at a minimum
• Must be critiqued and include recommendations for improvement.
Safety and Health Training
• Managers and supervisors:
  – Must understand their safety and health responsibilities as discussed in Management Leadership and Employee Involvement
  – Must effectively fulfill the safety and health responsibilities.
Safety and Health Training

• Managers, supervisors, and non-supervisors employees including contractors:
  – Must be made aware of hazards
  – Must receive training on:
    ▪ Recognizing hazardous conditions
    ▪ Signs and symptoms of workplace-related illnesses.
Safety and Health Training

- Managers, supervisors, and non-supervisory employees including contractors must:
  - Learn safe work procedures to follow in order to protect themselves from hazards
  - Must receive safety training in conjunction with job training
  - Must receive reinforcement/refresher training.
Safety and Health Training

- Managers, supervisors, non-supervisory employees including contractors, and visitors must understand what to do in emergency situations.
Employees must understand:

- Where and when PPE is required
- Why PPE is required, its limitations, how to use it, and how to maintain it
- PPE is not optional.
Safety and Health Training

• Job specific training is required for employees who conduct:
  – Hazard analyses
  – Self-inspections
  – Accident/incident investigations
  – Job hazard analyses, etc.
Safety and Health Training

• Minimum Requirements for new employee training:
  – Hazards at the site
  – Protective measures
  – Emergency evacuation
  – Employee rights under OSHA
  – VPP.
• General Training Program Requirements:

- Attendance must be documented
- Frequency must meet OSHA standards
- Additional training required for changes in processes, new equipment, new procedures, etc.
- Curricula must be up-to-date and specific to worksite
- Curricula must be modified for changes in worksite, hazards, controls, etc.
Questions