

Short-Term Construction

*Occupational Safety & Health Administration
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Background

The Voluntary Protection Programs (VPP) are generally geared to recognize excellent safety and health programs at fixed worksites with a stable and unchanging workforce. Currently, VPP participation by construction sites has been limited to major construction projects lasting more than two years or work performed by contractors at VPP sites. To address this issue, a Demonstration Program for Short-Term Construction Projects was developed during a recent OSHA/Voluntary Protection Program Participants' Association (VPPPA) workshop and approved on April 10th, 1998.

The Demonstration for Short-Term Construction Projects affords companies with excellent safety and health programs an opportunity to gain VPP recognition for providing a safe and healthful workplace for employees and subcontractors working at selected short-term worksites (12-18 months in length). Through the demonstration, OSHA desires to gain experience in how companies ensure a safe work environment at multiple, short-term construction sites.

Initially, four companies will be selected to take part in the Demonstration. If time and resources allow, more companies may be approved to the 5-year program. At the end of 5-years the OSHA Star requirements will be modified to incorporate the

demonstration criteria if the program proves successful. OSHA anticipates an increase in VPP participation by construction companies as the result of the Demonstration.

Demonstration Summary

The criteria for the Demonstration for Short-Term Construction Projects are as close to the traditional VPP criteria as is feasible. The Demonstration will require that all elements of the traditional program (Management Leadership, Employee Involvement, Worksite Analyses, Hazard Prevention & Control, and Training) are maintained at a level of excellence equal to Star for the company and applicant sites.

The Demonstration utilizes a 2 phase process. In Phase I, general contractors (GC) or construction managers (CM) who meet the VPP requirements submit a VPP application to OSHA describing their corporate safety and health program. After the application review and company headquarters onsite evaluation, a determination will be made as to the eligibility of the company to submit work sites for VPP approval.

Phase 2 requires the approved GC/CM to submit a streamlined, less burdensome implementation plan for each site that is qualified to participate in the program. The implementation plan must detail the specifics of the project, and how the company's safety and health program

is being implemented at the site. Information found in the company application need not be repeated. Similar to Phase 1, a plan review and an onsite visit will be conducted. Recognition will be awarded to those individual sites that meet the VPP demonstration criteria for excellence. Demonstration recognition will continue until the construction project ends, the recognition is forfeited based on noncompliance with program criteria, or the company/project withdraws.

Does My Company Qualify?

Companies applying to the Demonstration must have:

- ★ a safety and health management system that meets all applicable VPP Star requirements;
- ★ a combined 3-year Total Recordable Case Incidence Rate (TCIR) for Injuries plus Illnesses and Days Away Restricted or Transferred (DART) Case Incidence Rate for all employees and subcontractors (with more than 1000 hours in any calendar quarter) below the industry average of the GC's or CM's Bureau of Labor Statistics (BLS) standard industrial classification (SIC) code;
- ★ At least four sites that could potentially qualify for VPP (see below) during the company's participation in the Demonstration.

How Do We Apply?

Phase I: The GC/CM must prepare a company application that details the corporate safety and health program (as defined in the traditional VPP application process) that includes:

Total Recordable Case Incidence Rate (TCIR) for Injuries plus Illnesses and Days Away Restricted or Transferred (DART) Case Incidence Rate for:

- 1) all company employees;
- 2) all company supervised temporary employees;
- 3) each subcontractor with more than 1000 hours (total) per any calendar quarter (sorted by SIC code); and
- 4) a combined 3 year rate for employees listed in 1-3 above (including total hours worked).

Furthermore, the company application must describe the subcontractor safety program. The discussion shall include, but not be limited to: selection of subcontractors, pass-down of safety requirements to the lowest levels of subcontractors, subcontractor safety and health commitment, employee involvement, and safety and health assurances for subcontractors.

Phase II: After a successful review and approval of a company's application, the company is eligible to submit an implementation plan (IP) for each site qualified to participate in the Demonstration. Each site IP should be submitted 2 months prior to ground breaking.

Note: Consideration may be given to an IP submitted after ground breaking if time and resources permit.

Each IP should describe how the company safety and health program is being implemented at the site; it need not unnecessarily repeat any information found in the company application.

Each implementation plan should include:

- 1) Site name and address.
- 2) Site Manager (name & title).
- 3) Site VPP Contact (name & title).
- 4) Phone numbers.
- 5) The major phases of the construction project, including projected time lines.
- 6) Insurance Workers' Compensation Experience Modification Rates (EMRs) for the GC/CM, and subcontractors at the site. Note: EMRs should be 1.0 or less, where an EMR of 1.0 indicates an average for that industry classification.
- 7) Written documentation that the Owner, Unions, and Subcontractors at the site formally agree to follow the VPP principles.
- 8) Written summary that indicates how Management Leadership, Employee Involvement, Worksite Analyses, Hazard Prevention & Control, and Training will be implemented at the site.
- 9) Written description of how external hazards that impact the site have been or will be addressed.
- 10) Written description of how the subcontractor safety program will be implemented at the site.

Where Do I Apply?

If you are interested and you believe you can qualify, submit 2 copies of your company application to Cathy Oliver, Chief of Voluntary Programs at the address listed at the end of this article. Application guidelines are available from any OSHA Regional Office. After OSHA has reviewed your written application, you will be contacted.

Where Can I Get More Information?

The VPP Manager in your OSHA Regional Office can provide you with a VPP information kit and can help answer your questions.

Additionally, there is a wealth of useful information from OSHA's Internet site at <http://www.osha.gov>. VPP information begins at:

<http://www.osha.gov/dcsp/vpp/index.html>

You may also direct your questions or comments to Cathy Oliver, VPP Chief, or Christopher Warren, Safety Specialist at the number listed below.

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