

**Occupational Safety and Health Administration**  
**DRAFT**  
**Revised Corporate VPP Concept Paper**  
**September 2, 2003**

**BACKGROUND**

The Assistant Secretary of Labor for Occupational Safety and Health has challenged the Occupational Safety and Health Administration (OSHA) to significantly expand participation in OSHA's Voluntary Protection Program (VPP). To meet this challenge, the agency is considering new ways to increase VPP membership, including a streamlined process for multiple sites within a corporation to apply for and gain VPP recognition. OSHA's Directorate of Cooperative and State Programs (DCSP) has had informal discussions on the concept with Regional VPP managers and well-known corporations. Several corporations – including Johnson and Johnson, Dupont, Dow, and GE – have communicated to OSHA their desire to further explore streamlined processes.

This paper describes the proposed Corporate VPP participation, based on ideas from OSHA field staff and representatives of large corporations.

**OBJECTIVE**

OSHA's objective is to establish an elite category of VPP participation for world-class corporations that make a top-level commitment to reducing injuries and illnesses through meaningful corporate-wide safety and health programs. This new category of participation will be challenging but, at the same time, will provide maximum support to corporations through streamlined application and onsite evaluation processes for their sites.

**BENEFITS**

Corporate VPP will result in benefits to corporations, their employees, and OSHA:

CORPORATIONS	EMPLOYEES	OSHA
<ul style="list-style-type: none"> <li>• Conserves corporate resources by eliminating redundancy in preparing applications for multiple sites in the same corporation</li> <li>• Conserves corporate resources through a simplified onsite review process for multiple sites</li> <li>• Provides world class, elite status</li> </ul>	<ul style="list-style-type: none"> <li>• Increases the number of corporate employees benefited by the adoption of best practices throughout the corporation's operations</li> </ul>	<ul style="list-style-type: none"> <li>• Conserves OSHA resources through streamlined application review processes, especially for multiple sites</li> <li>• Conserves OSHA resources through a streamlined onsite review processes, especially for multiple sites</li> <li>• Helps OSHA meet the Assistant Secretary's challenge of significantly expanding VPP participation by bringing in more corporate sites into the program</li> </ul>

## ELIGIBILITY CRITERIA

Participation in Corporate VPP will be limited to corporations that make a top-level commitment to reducing injuries and illnesses through the implementation across the corporation of a comprehensive safety and health management system that achieves exemplary occupational safety and health.

Corporations will be eligible if they demonstrate the following:

- **Corporate commitment.** The corporation has made a written top-level commitment to reducing injuries and illnesses and achieving exemplary occupational safety and health throughout its organization by actively seeking VPP recognition for the corporation as well as its multiple facilities. The corporation may develop its own commitment statement or adopt the commitment statement to be developed by OSHA.
- **Corporate philosophy and vision.** The corporation has a written corporate philosophy and vision for safety and health.
- **Corporate goals and progress report.** The corporation establishes annual performance goals, develops a system to track its progress on these goals, and prepares an annual corporate report that describes its progress in meeting these goals.
- **Significant corporate participation in VPP.** [This section will be developed after review of data regarding current VPP participants and the regional pilots and, based on the data, to recommend the percentage of VPP participation to be required of corporate participants and how corporations can demonstrate progress in VPP participation. Such factors as the number of sites and the number of employees in a corporation will

be taken into account. Update: group agreed on 9/30/03 to consider a graduated approach. Update: group agreed on 10/2/03 to provide general guidelines, but keep this flexible.

- **Senior leadership commitment.** The corporation's senior leadership and management demonstrate commitment to VPP through their actions and are available for interview during OSHA's corporate onsite review. Examples of ways to demonstrate this commitment include the following:
  - Policy statements, memos, and other forms of communication that specify a corporate commitment to occupational safety and health signed by a corporate executive or senior manager
  - Oral and written statements recognizing the importance of safety and health
  - Documents describing a performance management system that holds senior leadership and management staff accountable for achieving corporate safety and health goals (e.g., performance plans for executives and senior managers that include safety and health elements)
  - Documents describing a system, supported by senior leadership and management, to recognize and reward safety and health achievements in the organization
  - Documents to show adequate budget allocations for safety and health programs throughout the corporation
  - Documents or oral statements (e.g., an organizational chart, a functional chart, statements in an interview during the onsite review process) that demonstrate how significantly safety and health fit in the organization
  - Documentation or oral statements that demonstrate awareness of hazards by executives and senior managers of the corporation
- **Established pre-screening process.** The corporation has an established internal process for pre-screening its potential VPP sites, including a process for reviewing site applications prior to submission and for conducting a corporate VPP audit.
- **Corporate safety and health programs.** The corporation has written safety and health programs that are consistently and uniformly implemented throughout the corporation, including at each of its facilities. Some examples we may look for include programs, processes, or systems around:
  - Goals and objectives
  - Business integration of safety and health
  - Accountability and performance appraisal

- Employee engagement
  - Contractors
  - Quantifiable measures
  - Measurement processes
  - Industrial hygiene
  - Hazards analysis
  - Risk identification and elimination
  - Accident/Incident investigation
  - Safety and health training protocols and tracking
  - Audit/self-evaluation
  - Process for evaluating progress
  - Annual report on corporate progress
  - Comparison of corporate performance with overall national performance
- **Outreach and mentoring.** The corporation actively mentors another corporation, another company's site, or a Federal agency. The corporation may mentor an organization recommended by OSHA or itself identify the organization it would like to mentor.
  - **Active participation in Safety and Health Community.** The corporation participates in the Safety and Health Community, such as by being actively involved in business schools, the National Safety Council, or Federal Safety and Health Councils.
  - **Renewal/recertification.** OSHA will develop a process for renewal and recertification of Corporate VPP recognition every \_\_\_\_ years.

## **CORPORATE APPLICATION AND ONSITE REVIEW PROCESSES**

A corporation that seeks Corporate VPP participation will be required to submit a corporate VPP application and participate in a corporate onsite review.

- **Corporate VPP application.** The Corporate VPP application will be prepared following these guidelines:
  - The corporate applicant will submit a corporate application that includes all VPP elements and describes corporate-wide safety and health policies that are consistently and uniformly implemented at all of the corporation's facilities.
  - To make the process easier for corporate applicants, OSHA will develop a "model application," template which applicants can use as an example to follow.
  - OSHA will conduct priority review of all corporate VPP applications.

- **Corporate onsite review.** OSHA will expedite the scheduling of onsite reviews for Corporate VPP applicants. The corporate onsite review of one to two days will cover the following:
  - Interviews with the CEO and other senior leadership and management staff to verify top-level corporate commitment to safety and health (**Note:** This interview may be waived for corporations with a long history of VPP participation.)
  - Interviews with safety and health staff to establish adequacy of resources, integration of safety and health into the organization, corporate philosophy and approach, and how safety and health staff relate with other staff in the corporation
  - Interviews with employees to verify employee involvement and establish the adequacy of the safety and health culture
  - OSHA to develop protocols for what corporate evaluation will look like.

#### **APPLICATION AND ONSITE REVIEW PROCESSES FOR INDIVIDUAL CORPORATE SITES**

Once accepted for Corporate VPP participation, a corporation may apply for VPP recognition for its various facilities or may allow its facilities to directly apply for VPP recognition, following these guidelines:

- **VPP application for an individual facility of the corporation.** The VPP application for facilities belonging to a Corporate VPP participant will follow these guidelines:
  - To facilitate the preparation of VPP applications from the corporation's various facilities, a Corporate VPP participant will share its corporate VPP application with its facilities. Each facility will develop a streamlined VPP application.
  - The application must cover all VPP elements, without duplicating the documentation of policies, systems, programs, and procedures that are corporate-wide in nature. However, the application must describe how these policies, systems, programs, and procedures are actually executed at the applicant facility's site.
  - OSHA will conduct an expedited review of all VPP applications from the facilities of a Corporate VPP participant. To facilitate this review, OSHA will share all approved Corporate VPP applications with OSHA Regional and Area Offices.
  - OSHA to develop a site application template.

- **Onsite review for a corporate facility.** OSHA will expedite the scheduling of onsite reviews for facilities of Corporate VPP participants. The onsite review of one to two days will be conducted following these guidelines:
  - OSHA will conduct a full-scale onsite sampling for the first few corporate facilities.
  - Once OSHA is able to establish that the corporation's safety and health programs are consistently and uniformly implemented (executed?) at the corporate facilities, the agency will conduct a more abbreviated onsite review, with one or two surprise elements.
  - OSHA to develop protocols for facility onsite evaluations.

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