

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION CHALLENGE PILOT

BACKGROUND

The Occupational Safety and Health Administration (OSHA) is committed to expanding cooperative programs and providing opportunities for all eligible employers interested in working with the Agency to create safer and healthier workplaces for their employees. Current cooperative programs include the OSHA Strategic Partnership Program, the Alliance Program, and the State Consultation Program. Current OSHA programs that recognize safety and health excellence are the Voluntary Protection Programs (VPP) and the Safety and Health Achievement and Recognition Program (SHARP).

OSHA has designed all these programs to meet the needs and interests of a diverse range of employers. VPP in particular has attracted a wide spectrum of employers, from mom-and-pop operations with limited resources to large industrial sites with fulltime safety and health professional staff. However, a program is not currently available that caters specifically to organizations that are interested in VPP but need a “roadmap” to attain VPP status. OSHA’s Challenge pilot is intended to satisfy this need. This new initiative is sufficiently flexible to recognize that there are many employers working towards attaining VPP, and these employers are at different stages in the development of an effective safety and health management system. The Challenge pilot enables these employers to receive recognition from OSHA for incremental progress. In addition, the Challenge pilot formalizes procedures and methods currently used by many corporations that have multiple VPP sites.

This paper outlines the Challenge pilot and discusses specific concepts that were developed by several workgroups including representatives from the OSHA National and Regional Offices, the Voluntary Protection Programs Participants’ Association (VPPPA), and several companies currently in VPP.

DEFINITIONS

Challenge Stages (I, II, and III): Levels of progression that Challenge pilot participants follow. Each stage has defined requirements to successfully implement components of an effective safety and health management system. These stages serve as a “roadmap” to guide participants towards achieving VPP status.

Challenge Administrators: Organizations such as corporations, non-profit associations, or Federal agencies that have dedicated resources to administer the Challenge pilot for their worksites/members or other organizations’ worksites/members. Administrators are involved in the application and review process.

Challenge Candidate: A Challenge Candidate is an employer who has elected to submit an application to a Challenge Administrator. The employer will remain a candidate until it receives OSHA notification that it has been accepted into the Challenge pilot.

Challenge Participant: A Challenge participant is a worksite that has been accepted into the Challenge pilot for the purpose of developing or improving its safety and health management system.

AUTHORITY

Section 21(c) of the Occupational Safety and Health Act gives OSHA the authority to develop pilots such as Challenge. The Act states, in part:

“The Secretary, in consultation with the Secretary of Health and Human Services, shall (1) provide for the establishment and supervision of programs for the education and training of employers and employees in the recognition, avoidance, and prevention of unsafe or unhealthful working conditions in employments covered by this Act, and (2) consult with and advise employers and employees, and organizations representing employers and employees as to effective means of preventing occupational injuries and illnesses.”

OBJECTIVES

The key objective of Challenge is to support OSHA’s mission to protect lives by reducing fatalities, injuries and illnesses in the workplace. Other important objectives of the Challenge pilot include:

- To support the Department of Labor’s Strategic Plan
- To support the OSHA Strategic Management Plan
- To logically integrate with the existing menu of cooperative pilots
- To uphold required quality and integrity standards of the VPP
- To be responsive to stakeholders’ needs and maintain positive relations

PILOT DESCRIPTION

The Challenge pilot is designed to be flexible to accommodate all major industry groups (e.g., manufacturing, construction, maritime, service industries, small businesses, unionized and non-unionized organizations). The initiative will provide opportunities for employers in these industries, as well as other employers not currently serviced by existing cooperative programs, to work with OSHA. Challenge will cater to employers wanting to improve their safety and health management systems and expedite their efforts to attain VPP status by providing a “roadmap” to guide them through the process. The “roadmap” refers to the defined set of Challenge stages that Challenge participants progress through. A separate roadmap or series of stages will be provided for the construction industry. OSHA will provide recognition to these participants for successful

completion of each stage as they incrementally improve their safety and health management systems.

Administrator Eligibility

An important element of the Challenge Pilot initiative is to work cooperatively with qualified Challenge Administrators. The work performed by Administrators will ease the burden on OSHA's limited resources. Challenge Administrators may be corporations, non-profit associations, and Federal agencies that are approved by OSHA to act as such. Certain criteria are required of Challenge Administrators, including demonstrated knowledge and experience in safety and health management systems, availability of adequate resources, and a commitment to the pilot.

Administrators will act as the primary contact with their Challenge participants. They will guide participants through a structured series of stages to make incremental improvements in their safety and health management systems. Administrators will also have an important role in collecting and reporting information on each candidate and participant, such as injury and illness data.

Candidate Eligibility

The Challenge pilot is open to private or public-sector employers under OSHA's jurisdiction who are interested in and committed to improving their safety and health management systems. These employers, if accepted, will be known as Challenge participants. Prospective candidates will need to have the sponsorship of an approved Challenge Administrator and must confirm their commitment to improve their safety and health management systems. All Challenge participants must be approved by OSHA.

Completion of Stages

OSHA will accept participants at various stages, depending on which safety and health management system elements they have already implemented, if any. Once approved, Challenge participants will begin work with their Administrators to implement and/or improve these systems. All participants will be required to show progression through the stages by demonstrating knowledge, actions, documentation, and specific outcomes at the completion of each stage. At the completion of the final stage (III), the participant should be prepared to apply for VPP.

Pilot Incentives

At the completion of each stage, OSHA will provide recognition to the participant. Recognition will include congratulatory letters from OSHA acknowledging the participant's accomplishment in Challenge. The participant's site will also be featured on the OSHA web page.

Pilot Measures

OSHA will measure the pilot's success at both the participant level and overall pilot level. At the participant level, OSHA will evaluate quantitative and qualitative measures, such as illness and injury data, and leading indicators for management commitment and employee involvement. Pilot success measures will include evaluating the number of participants at each stage, percent of participants progressing to the next stage, and the percent of those achieving VPP.

PILOT IMPLEMENTATION

OSHA will kick off the Challenge pilot in a formal ceremony attended by OSHA Assistant Secretary John Henshaw, as well as Administrators representing a corporation, a Federal agency, and a nonprofit association.

Each Challenge pilot Administrator will endeavor to sponsor ten approved participants. OSHA will provide continuous monitoring and a formal evaluation after one year. Monitoring may include quarterly conference calls, progress reports, and face to face meetings with the Challenge Administrators and participants.

After the one-year evaluation, OSHA will determine, based on its findings, whether to continue, modify, or terminate the pilot. Alternatively, the Assistant Secretary may decide to formalize Challenge through normal procedures, for example, a Federal Register Notice or OSHA directive.